

# No more excuses: Prioritising local leadership in cash assistance in Ukraine

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## WHO WE ARE

**Ground Truth Solutions (GTS)** is an international, non-governmental organisation dedicated to ensuring the priorities of people affected by crises are systematically considered in humanitarian and climate action, from individual responses to system-wide humanitarian reform. Evidence and ideas gathered through rigorous research and inclusive dialogue enable crisis-affected communities to actively shape the decisions that impact their lives. Headquartered in Austria, GTS works globally as an independent advocate, collaborating closely with local partners who share our vision.

**Open Space Works Ukraine (OSWU)** is a women-led social change enterprise dedicated to enhancing the effectiveness of humanitarian and development efforts in Ukraine and Eastern Europe. OSWU conducts in-depth research and analysis to inform humanitarian and development programming, facilitates stakeholder dialogue to support evidence-based decision-making, and provides organisational development services. Based in Ukraine, OSWU collaborates with a diverse range of partners to ensure that local perspectives and expertise drive meaningful, sustainable change.

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## 1. INTRODUCTION

Civil society organisations (CSOs) in Ukraine encompass a diverse spectrum, from long-standing NGOs and faith-based groups to newly formed volunteer-driven organisations, many of which have evolved into

permanent fixtures within their communities. Ukrainian legislation recognises several legal forms for CSOs, each with distinct regulations and operational implications.<sup>1</sup>

Since February 2022, Ukraine has seen a new expansion of local civil society, with 308 newly registered CSOs and an additional 1,700 volunteer-based CSOs emerging in response to the crisis. Pre-existing CSOs often have greater capacity, more extensive vetting, and closer integration with the aid sector, allowing them to access greater shares of funding and support.

The humanitarian landscape in Ukraine is now shaped by local organisations, which have become the principal providers of aid.<sup>2</sup> For example, local organisations represent 71% of all organisations involved in Ukraine’s Humanitarian Response Plan 2025;<sup>3</sup> and UN Agencies surveyed for the latest Annual Ukraine Localisation Survey estimate that on average, local or national NGOs implemented 55% of their programmes’ activities.<sup>4</sup>

Humanitarian cash assistance has emerged as a critical component of Ukraine’s response to the ongoing crisis. The scale of cash assistance since 2022 has been possible not only by the magnitude of need but also by Ukraine’s strong and resilient markets, which provide a conducive environment for large-scale cash assistance: In 2024, over 4 million people benefited from cash assistance, amounting to USD 680 million. This is a reduction from USD 1.08 billion in 2023 and USD 1.49 billion in 2022.<sup>5</sup> Further reductions are anticipated in 2025; the announced cancellation of more than 90% of USAID funding has led to the suspension of numerous aid programmes worldwide, including those in Ukraine.

Despite Ukraine’s well-established civil society, the majority of cash transfer programmes are shaped by international organisations. Local CSOs are often restricted to support functions such as recipient registration. In 2024, only 3.4% of funding for cash assistance was handled by local or national organisations.<sup>6</sup>

As the war enters its fourth year and funding cuts demand more cost-efficient solutions, the need to align more closely with the government-led social protection system is increasingly urgent. Meanwhile, enhancing the role of local actors in leading and sustaining cash assistance efforts is essential for long-term effectiveness. This study aims to examine the current and potential future role of Ukrainian civil society in the provision and leadership of cash assistance programmes, in accordance with their comparative advantage. It will explore local actors’ added value, identify barriers to their full participation, and offer insight into how cash programming can transition to Ukrainian CSOs. The findings will inform stakeholders including response leadership, donors, and cash actors about opportunities to shift toward a more locally-led model of humanitarian cash assistance that aligns with and complements Ukraine’s social protection system.

<sup>1</sup> For more information on the state of the civil society organisations, consider: KIIS. 2023. [“Ukrainian Civil Society Under the War.”](#) The study examined the state of civil society in Ukraine during the war, focusing on public associations, charitable organisations, as well as volunteer and humanitarian initiatives.

<sup>2</sup> ACAPS. June 2023. [“Thematic report.”](#)

<sup>3</sup> OCHA. January 2025. [“Ukraine HNRP 2025.”](#)

<sup>4</sup> Center for Disaster Philanthropy, Refugees International, and EAST SOS. 2024. [“The Annual Localisation survey.”](#)

<sup>5</sup> OCHA. 2025. [“Cash and Voucher assistance – Ukraine 2024.”](#)

<sup>6</sup> According to the Annual Ukraine Localisation Survey. Refugees International. 2024. [“Less Than 1% of Humanitarian Funding for Ukraine Goes Directly to Local Organizations - Refugees International.”](#)

## EXECUTIVE SUMMARY

Localisation is a key policy priority for donors and cash actors in the humanitarian response in Ukraine. However, Ukrainian CSOs remain largely in support roles rather than leading cash assistance efforts.

This report makes clear that there are **no more excuses** for delaying the shift toward locally-led cash assistance in Ukraine. The evidence is available, the models exist, and the capacity is present. With funding constraints intensifying in 2025, transitioning to a locally led model is not just an option – it is an imperative for the future of humanitarian aid in Ukraine. The humanitarian sector must move beyond rhetoric and decisively empower local actors, ensuring that those closest to the crisis receive the leadership roles they are capable of fulfilling.

The report is structured around a conceptual framework that differentiates between localising institutional cash assistance and empowering locally led cash responses in Ukraine. The former focuses on equipping local actors to operate within the international, institutionalised cash system, whereas the latter emphasises empowering local actors to lead cash responses independently.

### **What aid recipient think of cash assistance and social protection**

The lack of locally led decision-making often worsens access barriers to cash assistance and social protection services. Aid recipients name many challenges such as exclusion from aid due to rigid eligibility criteria, inconsistent information channels, and bureaucratic hurdles. These challenges could be alleviated through greater leadership of local actors who are deeply embedded in communities and have firsthand knowledge of their needs. Top-down decision-making risks overlooking gaps that local civil society organisations are better placed to identify and address.

### **Good practices for locally-led cash solutions**

Local CSOs often serve as the primary link between aid recipients and assistance programmes, particularly for vulnerable populations who might otherwise be excluded. Many marginalised groups, including Roma internally displaced persons (IDPs), face barriers such as digital exclusion, limited information, and institutional mistrust. Local CSOs can play a critical role in overcoming these challenges, ensuring that communities hesitant to engage through official channels still receive the support they need.

Unlike international NGOs and UN agencies, which often face security restrictions, local actors are also able to access frontline areas and remote communities, delivering aid to those who might otherwise be left behind.

Beyond delivering aid, Ukrainian CSOs play an essential role in helping people navigate bureaucratic processes and secure state support. Through informal referral networks, local organisations identify individuals eligible for social protection programmes and direct them to the relevant government offices. In turn, local authorities often rely on CSOs to verify and refine beneficiary lists, ensuring that assistance reaches those most in need.

Several promising locally led initiatives demonstrate the potential for a stronger role for Ukrainian CSOs in cash programming.

- The Ukraine Humanitarian Fund (UHF) has significantly increased direct funding to national actors, allowing them to operate more independently. Its localisation strategy prioritises fair and genuine partnership models between lead partner and sub-implementing partner.
- Locally led cash models, such as the Survivor and Community-Led Response approach, have proven highly effective in empowering communities to take ownership of aid distribution.
- A growing number of CSOs also emphasise the importance of flexibility and autonomy in programme design as a key factor in achieving more equitable partnerships. Examples from Stellar NGO, Caritas Odesa, and Tenth of April illustrate how local actors, when given greater decision-making power, can develop cash assistance initiatives that are more responsive, inclusive, and sustainable.

**Good practices in integrating local CSOs into the conventional cash coordination**

Over the past three years, many organisations have significantly scaled their operations, adapting to the complexities of cash and humanitarian assistance. They have developed expertise in programme coordination, targeting, data management, and aid recipient registration. Ukrainian CSOs also take on a vital role in providing guidance to newer or international actors entering their local space.

A key development in the localisation of humanitarian response is the increasing role of national organisations in mentoring smaller local CSOs. This model strengthens the sustainability of aid efforts, fosters local ownership, and equips smaller organisations with the skills and resources needed to operate independently. National organisations such as Right to Protection have pioneered peer-to-peer capacity-building initiatives that enable local organisations to assume greater leadership in cash programming. Similarly, Caritas Odesa has worked to formalise volunteer efforts by transforming active community groups into legally recognised CSOs. Through training in grant-writing and financial management, these newly established organisations have gained the capacity to secure diverse funding sources and operate autonomously, reducing dependency on a single donor. While many of these groups are still volunteer-driven, their formalisation marks an important shift toward a more locally led humanitarian response.

Ukrainian CSOs are also strengthening their collective voice through structured networks such as the cash-specific Collaborative Cash Delivery (CCD) Community of Practice, the Alliance of Ukrainian CSOs, and the National Network of Local Philanthropy Development. These initiatives improve coordination, amplify local perspectives, and advocate for greater inclusion in humanitarian decision-making.

Within formal coordination structures, progress has been made in ensuring greater participation of Ukrainian CSOs. The Cash Working Group (CWG) has embraced a more inclusive approach, incorporating simultaneous translation and expanding spaces for local actors. This has led to increased visibility and leadership roles, with the Ukrainian Red Cross Society now co-chairing the CWG and Right to Protection co-leading the Protection Cluster – milestones in advancing the localisation agenda. However, engagement in coordination structures does not always translate into full decision-making power, as humanitarian clusters often remain exclusive spaces where established connections determine access.

Finally, another major challenge for local actors is the bureaucratic burden of due diligence and capacity assessments, which are often repetitive and resource intensive. The CCD Network has sought to address

this through a harmonised due diligence tool, which streamlines the process and enables the progressive transfer of responsibilities to local organisations. These efforts represent critical steps toward ensuring that Ukrainian CSOs are not just implementers but full partners in the humanitarian cash response.

### **Challenges to locally-led solutions**

One of the most pressing obstacles is the top-down nature of programme design, which is largely dictated by international organisations, and shaped by external political and strategic considerations rather than direct input from affected communities. Ukrainian CSOs frequently find themselves in the role of implementers rather than decision-makers, executing predefined projects with little flexibility to tailor assistance based on local needs. This rigidity prevents them from leveraging their on-the-ground knowledge to improve the efficiency and inclusivity of cash assistance programmes. In many cases, power imbalances in programme design prevent meaningful collaboration, as donor-driven priorities take precedence over locally led solutions.

Another major challenge is the tendency of donors and international agencies to prioritise frontline regions, often at the expense of broader, long-term support. While aid to high-intensity conflict zones is critical, this focus has led to reduced funding for rehabilitation, medical assistance, and integration efforts in central and western Ukraine, where many displaced populations remain. Attempts by CSOs to advocate for a more balanced distribution of funds, ensuring that long-term recovery needs are met, have often been rejected. This lack of flexibility further limits local actors' ability to design responses that adapt to evolving community needs.

Efforts to integrate humanitarian cash assistance with Ukraine's government-led social protection system have also been fragmented. Coordination between humanitarian actors and relevant ministries remains inconsistent, leading to inefficiencies, duplication of efforts, and gaps in coverage.

### **Barriers and hesitations to integrating local CSOs into the conventional cash coordination**

This chapter explores the key barriers preventing the full integration of local civil society organisations (CSOs) into the conventional humanitarian cash coordination. These challenges include legal and taxation complexities, restrictive donor policies, financial compliance requirements, and institutional capacity gaps. Local organisations often have the capability to deliver aid effectively, yet they are discouraged from leading cash assistance programmes due to burdensome financial accountability measures, competitive funding structures that favour international actors, and a lack of direct access to financial resources.

Funding constraints remain one of the most pressing obstacles. Donor policies tend to prioritise large, well-established international organisations, leaving Ukrainian CSOs reliant on subcontracting arrangements rather than receiving direct funding. Complex financial and regulatory requirements further exacerbate these difficulties, making it challenging for local actors to secure and manage funds independently. Even when funding is available, bureaucratic procedures can delay emergency responses, undermining the efficiency of aid delivery.

Language barriers create additional obstacles for local CSOs seeking to engage with the formal humanitarian system. Coordination meetings, operational guidelines, and funding applications are predominantly in English, limiting access to critical information about financial opportunities, technical

guidance, and response planning. As a result, local actors are often excluded from key discussions and decision-making processes, reducing their ability to influence aid strategies.

Despite ongoing efforts to localise humanitarian coordination structures, many local actors remain sidelined from the formal coordination system. This can lead to inefficiencies in efforts to reduce duplication. With multiple actors operating in the same regions, instances arise where aid recipients receive aid from more than one source while others remain underserved. Building Blocks, a blockchain-based system developed by the World Food Programme to prevent duplication, has proven effective, yet challenges remain. The system is primarily used for Multi-Purpose Cash Assistance (MPCA), and local actors often face barriers in accessing and utilising it for deduplication. Instead, they rely on informal networks to verify whether aid recipients have already received assistance.

Additionally, the technical nature of humanitarian coordination discussions can exclude local CSOs from meaningful participation. Many of these discussions assume prior experience with complex aid mechanisms, sector-specific standards, and international donor expectations—areas where international actors have an advantage. While Ukrainian CSOs are adapting and strengthening their capacity, these structural barriers continue to limit their role in leading and shaping humanitarian cash assistance efforts.

The technical nature of coordination discussions can exclude local CSOs from meaningful participation, as these conversations often assume prior experience in complex aid mechanisms and sector-specific standards

### **Call to action: breaking down barriers to local leadership**

This report calls for urgent action to break down the barriers preventing these good practices to multiply and Ukrainian CSOs from taking on leadership roles in cash programming. With international commitments to and evidence for greater cost-efficiency with localisation, there is no justification for maintaining the status quo.

#### **At the global level:**

**Level the playing field:** Donor funding prioritises scale and speed, disadvantaging local actors. Funding criteria should include sustainability, local capacity-building, and long-term impact rather than focusing solely on risk minimisation. International partners must budget for localisation efforts and ensure joint decision-making with Ukrainian CSOs, while local organisations should demonstrate the effectiveness of locally led aid.

**Ensure fair and transparent funding:** Opaque financial flows limit local CSOs' ability to advocate for fair funding. Donors should require independent audits and share financial reports with all stakeholders, while international agencies must publish detailed breakdowns of funding allocations, aligning with Grand Bargain commitments.

**Extend project durations:** Short-term funding cycles create instability. Donors should prioritise multi-year commitments, while international partners must transition from six-month grants to longer-term agreements. Local CSOs should strengthen financial management and develop multi-year strategic plans to enhance sustainability.

### At the national level:

**Shift international actors to advocacy:** Donors, UN agencies, and INGOs should focus on policy reform rather than direct aid delivery, allowing Ukrainian CSOs to lead. Their influence should push for tax reforms, national aid registries, and integration with social protection systems.

**Increase national leadership in coordination:** Humanitarian coordination must further prioritise Ukrainian CSO leadership. Key documents should be translated into Ukrainian, donors should assign national focal points, and local actors should receive training for leadership roles.

**Ensure fair and sustainable funding:** Donors should increase direct funding to local CSOs, expand multi-year commitments, and enhance technical support for financial management to strengthen sustainability.

**Diversify funding sources:** Local CSOs should reduce reliance on humanitarian aid by securing government contracts, private sector funding, and social service provision.

**Support nationally led consortiums:** Donors should prioritise Ukrainian-led consortiums, while INGOs should transition to supporting roles rather than leading projects. Large national CSOs should mentor smaller organisations.

**Foster genuine partnerships:** Local CSOs must be included in programme design, not just implementation. Funding should require co-led projects, and INGOs must support leadership training and peer-to-peer learning.

### At the local level:

**Strengthen local authority involvement:** Improve coordination between local authorities, CSOs, and donors for better aid delivery. Support integrated cash and social service initiatives to ensure structured referrals.

**Improve aid communication:** Use trusted local networks to share clear, accessible aid information. Ensure transparent, widely available updates through local councils and CSOs.

**Adopt flexible eligibility criteria:** Implement an 85/15 model, giving local CSOs discretion over 15% of aid. Ensure eligibility criteria reflect real needs, not rigid categories.

## 2. DESK REVIEW

Extensive research exists on the state of localisation in Ukraine. One key conceptual framework that helps to structure the discussion distinguishes between localising institutional cash assistance and enabling locally-led cash responses in Ukraine.<sup>7</sup> The former focuses on equipping local actors to operate within the international, institutionalised cash system, whereas the latter emphasises empowering local actors to lead cash responses independently. Localised institutional cash assistance is designed to be efficient, standardised, and accountable to donors, and it often imposes predefined transfer values and targeting criteria. However, it risks overlooking local realities and marginalising community-driven solutions. Locally-

<sup>7</sup> Tebbutt et al. 2024.

led cash responses, by contrast, prioritise community-defined approaches, and focus on support for local solutions that sit beyond the conventional aid system.

Our report uses this framework to examine two inter-related dynamics that shape cash assistance in Ukraine: (i) we explore the role of civil society actors in institutional cash assistance coordination, including their participation in cash programmes driven by UN agencies and international NGOs, as well as international coordination structures; and (ii) we assess locally-led cash responses, including how local, context-driven cash initiatives are implemented and where they remain constrained.<sup>8</sup>

## 2.1 Localising cash assistance

The Localisation Baseline Study is a resource for both international and national actors that offers a roadmap to strengthen localisation in Ukraine's humanitarian response. It analyses progress across seven areas: leadership, coordination, complementarity, partnership, funding, participation, and policy influence. According to the study's latest version, civil society organisations continue to face barriers in accessing leadership roles within coordination mechanisms, which limits their influence within strategic decision-making. The report underscores the need for structural reforms to enhance the participation and leadership of local actors in humanitarian responses. It also highlights the importance of equitable partnerships and increased direct funding, which remains “critical, considering its linkages with other areas, because many local actors still lack access to direct and equitable funding streams.”<sup>9</sup>

Localisation remains an under-explored area in the Ukrainian response, as few studies and initiatives fully address the challenges faced by national actors. The *Passing the Buck* study estimates that aid programming could be 32% more cost-efficient without relying on international intermediaries. It highlights the disproportionate overheads and salary costs within UN agencies and international NGOs, which significantly exceed those of national actors.<sup>10</sup> Indeed, most large-scale humanitarian financing mechanisms channel funds through UN agencies and international NGOs, which then subcontract local actors for implementation. This model limits the autonomy of local CSOs, often by tying funding to strict donor compliance requirements and heavy administrative burdens that smaller organisations struggle to meet.

II

*Traditional humanitarian funding mechanisms – with all their checks and balances – do not empower national and local organisations. Instead, they encourage the subcontracting model, which does not promote equal partnerships or localisation.*

**ACAPS. 2023**

Humanitarian donors in Ukraine recognise the unequal partnership dynamics that often arise from conventional funding models. This is reflected in revised donor cash messages, which encourage more

<sup>8</sup> This report does not advocate for one approach over another (localisation vs locally-led) but rather uses this comparison to examine different dimensions of localisation in Ukraine.

<sup>9</sup> Inter-Agency Standing Committee. 2024. “The Localisation Baseline Study.”

<sup>10</sup> Venton and The Share Trust. 2024. “Passing the buck.”

meaningful and equitable partnerships with local and national actors.<sup>11</sup> The Alliance of Ukraine Civil Society Organisations' locally-led response strategy in Ukraine (2024–2029) also identifies “Partnerships” as one key area where a shift is needed in order to enable local leadership. It calls for “equal partnerships between international and local organisations,” and for “international actors [to] transit to support roles.”<sup>12</sup>

One promising mechanism is the Ukraine Humanitarian Fund (UHF), through which direct funding to national actors rose from 21% in 2023 to 45% in 2024. Substantial room for improvement remains. In Somalia, for example, the country-based pooled fund allocates 78% of its funding directly to national actors, setting a benchmark for other localisation efforts.

Due diligence procedures remain a key challenge in enabling direct funding to local actors. Many local organisations struggle to meet complex compliance requirements set by international donors, which often act as a barrier to direct funding access.<sup>13</sup> This issue was explicitly highlighted in the [2022 Open Letter on Localisation](#), which called for more streamlined and accessible due diligence processes. In response, the Collaborative Cash Delivery (CCD) Network has worked on harmonising due diligence and cash capacity assessments through a “passporting” approach, which was specifically piloted in Ukraine.<sup>14</sup>

In Ukraine, reports highlight taxation issues as complicating the work of local humanitarian organisations. A key issue has been the misinterpretation of tax regulations by local tax authorities, which in some cases have led to cash assistance being incorrectly classified as taxable income for recipients. This has resulted in some unintended taxation of aid recipients, and created financial risks for both CSOs and people receiving assistance.<sup>15</sup> Concerns about tax risks have caused some local organisations to be reluctant to shift from in-kind to cash aid. There is a need to “address cash assistance taxation” to reduce the perceived risk of penalties from tax authorities.<sup>16</sup>

The principle of neutrality has also challenged civil society organisations in accessing the conventional collective aid response in the past. A narrative of solidarity has been understood as potentially incompatible with neutrality,<sup>17</sup> and the international aid system has been hesitant to channel aid through local actors due to concerns that aid would be diverted to the military.<sup>18</sup>

## 2.2 On locally-led responses

In the immediate aftermath of Russia’s full-scale invasion of Ukraine, volunteer groups and local organisations became the backbone of the humanitarian response, while international aid actors were

<sup>11</sup> Ukraine Humanitarian Core Donor Working Group. October 2024. “[Common Donor Messaging on Humanitarian Cash Assistance in the Response in Ukraine](#).”

<sup>12</sup> Alliance of Ukraine Civil Society Organizations. 2023. “[Locally-led response strategy in Ukraine](#).”

<sup>13</sup> Humanitarian NGO Platform. December 2023. “[Understanding Ongoing Localisation Initiatives and Improving the Policy and Operational Environment for Local Actors](#).”

<sup>14</sup> For more on good practices, see chapter 6.

<sup>15</sup> Decamps et al. December 2024. “[Alignment and Complementarity Between Humanitarian Cash Transfers and the Social Protection System in Ukraine](#).”

<sup>16</sup> Ground Truth Solutions and Open Space Works. 2024. “Aligning aid: Recipient perspectives on humanitarian cash and social protection in Ukraine.”

<sup>17</sup> Hargrave and Bryant. 2024. “Narratives and the Ukraine response. Implications for humanitarian action and principles.”

<sup>18</sup> Toney and Palacios. 2022. “Linking humanitarian cash and social protection in Ukraine. Emergency Response inside Ukraine Thematic paper.”

slow to mobilise. As highlighted in a Humanitarian Outcomes report on the humanitarian response just three months after the invasion started, "the first response was by Ukrainian civil society," with many local groups leveraging pre-existing networks to provide urgent assistance. However, despite their effectiveness, the formal humanitarian system struggled to incorporate these volunteer-led efforts into structured coordination mechanisms. The report noted that "some experienced Ukrainian NGOs had contingency plans and partnerships with foreign organisations already in place, enabling them to respond quickly," yet many of these actors found themselves excluded from funding streams and decision-making processes dominated by international agencies.<sup>19</sup> The disconnect between spontaneous local responses and the structured international aid system hindered collaboration, and fully integrating locally-led solutions into the formal humanitarian response is persistently challenging.

Several initiatives have sought to empower locally-led action and shift decision-making power to national actors in Ukraine. Such efforts include direct funding mechanisms for local organisations, increased collaboration between international agencies and local responders, and capacity-strengthening programmes to enable greater autonomy in humanitarian response.<sup>20</sup>

One good practice shared by Christian Aid is the "Assess and Assist" approach, a promising model for strengthening locally-led cash responses in Ukraine. Designed as a Cash for Protection (C4P) mechanism, this approach enables national actors to take a more active role in assessing needs and delivering tailored cash assistance. The approach prioritises a "listen and link" strategy, whereby trained local caseworkers conduct rapid assessments and provide targeted cash support, while also connecting individuals to specialised services. The approach offers a more adaptive and needs-based alternative to traditional cash programming, and ensures that people who fall beyond standard eligibility criteria are not excluded.<sup>21</sup>

The *Pathways to Localisation* study examines the experiences of local organisations partnering in different cash programme models in Ukraine, with some programmes delivering MPCA, and others Group Cash Transfers (GCT). Although recommended partnership improvements hold true for both kinds of cash programme, local actors that implement MPCA faced more challenges with beneficiary data management, strict eligibility criteria, and delays in funding from international NGOs, forcing them to adjust timelines and logistics rapidly. The reliance on the Building Blocks (BB) deduplication platform has further complicated operations, reflecting the broader barriers local actors face in navigating institutional cash systems.<sup>22</sup> Conversely, GCT implementers have encountered fewer issues with beneficiary data management, as their approach has allowed for greater adaptability and community-based decision-making. However, they have faced hurdles related to technical capacity gaps in financial management and the lack of formal recognition in humanitarian coordination mechanisms, making it harder to secure sustained funding. These challenges align with broader barriers in scaling locally-led cash assistance models, as community-

<sup>19</sup> Stoddard et al. 2022. "Enabling the local response: Emerging humanitarian priorities in Ukraine March–May 2022."


<sup>20</sup> Christian Aid. 2023. "Letting go of control - Empowering locally led action in Ukraine."

<sup>21</sup> Tebbutt, M. 2023. "Assess and assist - learning from Ukraine."

<sup>22</sup> Building Blocks is a blockchain-based platform for humanitarian assistance for interorganisational coordination. Since May 2022, Building Blocks was deployed to support the Ukraine emergency response. Building Blocks in Ukraine is provided by World Food Programme as a service for interorganisational deduplication. Food security cluster. August 2024. "Food Security and Livelihoods Cluster Guidelines for deduplication."

based approaches struggle to gain credibility and institutional support within the dominant humanitarian system.<sup>23</sup>

In open letters to international partners, local actors have emphasised the need for greater recognition of their contextual knowledge and agility in responding to crises, calling for a shift from being mere implementers to equal partners in decision-making processes.<sup>24</sup> Ukrainian organisations have also stressed the need to promote “accountability for support to local leadership” and the need for “ethical recruitment guidelines” to avoid concerning hiring decisions with detrimental effects for local aid actors and aid recipients.<sup>25</sup> Open letters have also highlighted the domination of financial resources by international actors, despite commitments to localisation.<sup>26</sup> This systemic exclusion has led many local CSOs to seek alternative funding models. Private donations, diaspora funding, and direct grants from philanthropic organisations have provided more flexible support for local and national actors, allowing them to operate beyond the constraints of institutional funding mechanisms.

 *The local aid response has grown organically and mostly revolved around private donations (in-kind or cash), rather than institutional funding. Several CSOs had linkages with diaspora networks that fund them directly.*

**Tonea and Palacios (2022)**

Important research on locally-led efforts concerns the alignment (or the lack thereof) between humanitarian aid and the government-led social protection system.<sup>27</sup> Donors have emphasised the need to strengthen connections between social protection and the humanitarian assistance, including better referrals, improved data-sharing, and leveraging government systems where appropriate.<sup>28</sup>

The PeReHID Initiative, launched in January 2023, is a collaborative effort between the Government of Ukraine and international partners to integrate and align humanitarian aid with the national social protection system. The initiative aims to support a transition from emergency humanitarian assistance to a sustainable, shock-responsive social protection framework that addresses both immediate and long-term needs. It has focused research efforts on harmonising targeting criteria, ensuring complementarity, and leveraging existing systems to enhance efficiency and coverage. However, studies on this topic demonstrate the significance of the remaining gaps: integration of the government and international systems remains largely fragmented, reflecting a lack of synergy between humanitarian and government-led initiatives. For instance, government and humanitarian organisations both target similar vulnerable

<sup>23</sup> Khokhobaia, N. CCD. 2024. [“Pathways to localisation: Local actors’ partnership experiences in CVA programmes in Ukraine and Romania.”](#)

<sup>24</sup> National Network of Local Philanthropy Development. November 2023. “The open letter Solidarity in action.”

<sup>25</sup> CAFOD, Caritas, and Christian Aid.

<sup>26</sup> Refugees International et al. 2023. “Communique from the National Conference on Localisation in Ukraine.”

<sup>27</sup> “Social protection systems are part of the basic package of public services. They consist of social assistance, social insurance, and labour market interventions. Social care and social support are complementary to social protection. Social protection seeks to reduce the impact of shocks on household poverty, build resilience over time, facilitate equity across society and promote opportunity.” Blin and Billings. 2022.

<sup>28</sup> OCHA. October 2024. [“Common Donor Messaging on Humanitarian Cash Assistance in the Response in Ukraine.”](#)

groups, such as households with three or more children, persons with disabilities, and older adults. However, they do so without sufficient coordination to avoid overlaps or address coverage gaps. This disjointed approach not only leads to inefficiencies but creates gaps in coverage for vulnerable groups.<sup>29</sup>

Civil society actors have a comparative advantage in strengthening aid-social protection linkages due to their established relationships with local authorities and government social protection departments. Because the initial 2022 no-regret-approach to cash assistance has transitioned to a more targeted and resource-constrained phase, the role of local actors will become increasingly critical.<sup>30</sup> Their systemic understanding, contextual insight, and discernment of vulnerabilities beyond standardised targeting criteria make them uniquely positioned to ensure a more comprehensive cash assistance response. They are also well placed to close the information barrier, identified as “one of the most prominent barriers to access [to social protection programmes].”<sup>31</sup> Local CSOs can play a crucial role in overcoming information barriers, facilitating referrals, and ensuring that vulnerable populations receive the support they need.

Existing reports and research into localisation in Ukraine rely heavily on desk reviews, secondary data, and consultations with international actors. Researchers’ direct engagement with local and national CSOs involved in the cash response has been limited, leaving key questions about their experiences, challenges, and leadership roles underexplored. There is also notable under-representation of local perspectives in qualitative assessments.<sup>32</sup> These gaps underscore the need for a research approach that prioritises Ukrainian civil society as primary stakeholders in discussions on humanitarian cash assistance and localisation. This study seeks to engage directly with local humanitarian actors to understand their operational realities, identify non-financial barriers to localisation, and explore practical solutions that can be implemented within current funding constraints. By shifting the focus from top-down institutional perspectives to locally driven insight, this research aims to contribute actionable recommendations that support a more effective and locally-led humanitarian cash response in Ukraine.

This report explores ways to strengthen localisation and locally-led action in humanitarian cash assistance in Ukraine by providing evidence-based insights in order to enhance the role of local actors in aid programming and delivery. The following sections examine the challenges and opportunities for greater local leadership in humanitarian cash responses. Chapter 3 explores the perceptions of crisis-affected people, drawing on insights from focus group discussions with local community members, including cash recipients, non-recipients, and internally displaced people. Chapter 4 presents promising practices in locally-led cash approaches; chapter 5 does likewise regarding localisation within the conventional

<sup>29</sup> Decamps et al. CCD. 2024. “How to apply a social protection lens to short-term CVA programming.”

<sup>30</sup> A “no regrets” approach recognises that the humanitarian system must shift away from a solely reactive response to crises towards an increasingly proactive, anticipatory approach – acting on risks instead of only reacting to needs, even if risks may not materialise in the way or with the impacts envisaged.

<sup>31</sup> Perehid. 2024. “Access study.”

<sup>32</sup> For instance: the [Compendium of Cash and Voucher Assistance in Ukraine](#) acknowledged that “more could be done” to integrate local perspectives into its findings; the [Annual Ukraine Localisation Survey](#) conducted 50 key informant interviews, yet only ten involved Ukrainian humanitarian NGOs, mirroring the limited local participation in the ACAPS report on [Perceptions of Localisation](#); and the [Cash and Protection in the Ukraine Response](#) study included 19 KIIs, but only two involved local NGOs; [Enabling the Local Response](#) by Harvey and Stoddard, which sought to capture diverse perspectives, did not clearly specify the extent of local actor involvement. The [localisation baseline study](#) successfully surveyed 279 local participants, yet only six participated in in-depth qualitative interviews, reinforcing the pattern of limited qualitative engagement with Ukrainian CSOs.


humanitarian coordination structure.<sup>33</sup> Chapters 6 and 7 delve into the challenges of localisation, structured around two key aspects: the obstacles faced by local-led solutions that operate beyond this structure; and the barriers to integrating local actors within the conventional humanitarian coordination structure. Chapter 8 concludes with key recommendations, complementing the insights from key informant interviews with findings from workshops conducted with local humanitarian actors. These recommendations provide actionable steps for donors, international partners, and national and local CSOs, to enhance collaboration and strengthen the leadership role of Ukrainian CSOs in Ukraine’s humanitarian cash response.<sup>34</sup>

### 3. WHAT AID RECIPIENTS THINK OF CASH ASSISTANCE AND SOCIAL PROTECTION

This chapter explores the link between community perspectives and localisation, emphasising how the lack of locally-led decision-making often worsens barriers to cash assistance and social protection services. Many challenges – such as exclusion from aid due to rigid eligibility criteria, inconsistent information channels, and bureaucratic hurdles – could be alleviated through greater involvement of local actors who are deeply embedded in communities and have first-hand knowledge of their needs.

#### 3.1 Experience with social programme support

Discussions among aid recipients highlight both the importance and limitations of social protection support in Ukraine. Many recipients rely on state social payments as their sole source of income, particularly low-income families and single mothers, yet the quantities received are often insufficient: “Apart from IDP [allowance payment],<sup>35</sup> we receive nothing, even though we have eight children,” a woman explained in Odesa oblast. A major challenge is the restrictive eligibility criteria for certain benefits. Some recipients noted difficulties in accessing IDP payments specifically, as the eligibility requirements exclude those not registered with employment centres. People perceive pensioners as an extremely vulnerable group who are not covered by state support.

 *[Pensioners] have a small pension, and medicine is very expensive now. Winter arrives, and to order a truckload of firewood, you need to pay UAH 12,000, while a pensioner has a pension of*

<sup>33</sup> Some good practices highlighted in chapter 4 and 5 arguably apply to both locally-led cash solutions and the localisation of institutional cash assistance. While locally-led cash solutions focus on support provided by international actors to strengthen local solutions and approaches outside the conventional aid system, localising cash assistance refers to integrating local actors into the formal humanitarian cash system, often alongside international agencies. Many examples bridge both themes, the distinctions are not absolute.

<sup>34</sup> We talked to 33 key informants and organised eight focus group discussions across different regions in Ukraine. For more information, read the methodological note at the end of the report.

<sup>35</sup> As of March 2024, Ukraine’s internally displaced persons (IDPs) receive monthly allowances of UAH 3,000 for people with disabilities and children, and UAH 2,000 for other IDPs. Recent legislative changes have introduced financial criteria and employment requirements, aiming to encourage self-sufficiency among IDPs. For more information, consult Global Protection Cluster. April 2024. “[Update on changes in payments of IDP allowance \(CMU Resolution #332\)](#).”

*UAH 2,000. So when winter comes, they have to survive for five months without eating because a single cubic metre of firewood won't be enough – they need a full truckload.*

**Aid recipient group discussion participant in Mykolaiv oblast**

Confusion also prevails over the discontinuation of IDP payments without explanations. “I was working, and they didn’t pay me. After six months, they stopped paying. And now that I’m not working, they still don’t pay,” one recipient in Kyiv oblast shared, pointing to confusion over eligibility rules. Others echoed this concern, describing how assistance is often abruptly halted or denied based on unclear or inconsistent criteria: “Often, you don’t understand the reasons for rejection or the criteria used.”

Beyond the eligibility criteria, inconsistencies in the operation of social protection programmes across different locations have created confusion amongst participants. Applicants found that social protection programmes operate under different rules depending on the region.



*In Kharkiv, my acquaintances received the IDP [allowance] payments [by the MoSP] while working, and when they quit, they just submitted a certificate, and their payments continued. But here, I was told no.*

**Aid recipient group discussion participant in Kyiv oblast**

### 3.2 How people learn about cash programmes

Accessing humanitarian aid or social programmes is not just about eligibility – it’s also about knowing where to look. For many people we spoke to, finding reliable information on social protection support or humanitarian cash programmes remains a challenge, as sources vary widely across regions and communities. Some people actively seek out information, while others happen upon it through social connections or community channels.

For those who are digitally connected, the internet is the first stop. Social media platforms, messaging apps like Telegram and Viber, and community groups serve as fast-moving information hubs. “I found out through a Telegram channel from our community space. When an international organisation offers assistance, it gets posted there, and we apply,” explained a displaced person from Zaporizhzhya oblast. Others take a more direct approach, searching online: “I searched for available aid, and it popped up. The registration process took about two weeks.”

However, not everyone we spoke to has access to the internet or knows where to look. In these cases, local administrative offices and community centres play a crucial role. Village councils, social protection offices, and district administrations often post announcements or provide guidance, particularly in rural areas. Some municipalities have adapted by creating official Viber groups to share updates directly with local communities.

The most powerful source of information about cash assistance is word of mouth, according to focus group participants. Friends, neighbours, and other displaced people often act as informal information

networks, passing on details about available assistance. "I found out from friends. They call and tell me to go apply," said a woman from Zaporizhzhya oblast. Others recalled learning about other aid programmes while standing in lines for humanitarian assistance, where conversations naturally turned to where to register and which organisations were providing support.

Despite these multiple sources of information, some groups still struggle to access information. According to focus group participants, those without internet access, without strong community ties, or those living in areas with limited administrative outreach risk missing opportunities to access assistance. The fragmentation of information – whereby one organisation’s criteria and procedures differ from another’s – only adds to the confusion.

### **3.3 Challenges during registration**

With regard to humanitarian cash programmes specifically, one of the most frequently reported issues was exclusion due to strict eligibility criteria. Many individuals, despite being in clear need, were denied assistance because they did not fit into predefined categories for vulnerability. Bureaucratic requirements further complicated access, often requiring documentation that was difficult or impossible for some to obtain at the right moment. A woman in Kyiv oblast explained that despite her financial struggles, she did not qualify for aid: "They showed me their orders in a folder, listing the eligible groups – those with children, people with disabilities."

Rigid regulations also led to unfair exclusions for those whose homes had been damaged but later repaired. "I asked about it, and they told me, 'For assistance to be approved, the damage must still be present at the time of inspection.' I had photos, but they didn't count them," a man from Dnipropetrovsk oblast recalled. Others highlighted the arbitrary exclusion of homes in informal housing areas: "If a building is not a residential property, like in a dacha settlement, the state programme does not cover it."

### **3.4 Recommendations from aid recipients**

One of cash recipients' most common requests was to increase direct cash support, as many believe it is the most efficient form of aid. "Money is the best option because everyone has different needs," one recipient in Zaporizhzhia oblast explained, arguing that direct financial assistance allows families to purchase essential items based on their specific circumstances. Others recommended more predictable, stable payments instead of irregular lump sums, emphasising that "people need to know that they will receive a certain amount every month so they can plan accordingly."

Another recurring theme was the need for better coordination with local authorities. Many participants suggested that aid distribution should be facilitated through village councils, which already maintain lists of people in need. "If assistance is distributed through them, people will trust it," one recipient in Barishivka noted, highlighting the importance of credibility in aid efforts. Participants also emphasised the need for public announcements and official communication channels, including local Viber groups, village notice boards, and direct phone calls to ensure that information reaches those without internet access.

Lastly, eligibility criteria for aid programmes should be expanded to include those who currently are currently excluded. "Not everyone can work, and not everyone can get hired," one participant in Odesa oblast explained, urging the government to revise its assistance policies for the unemployed.

The findings underscore how top-down decision-making risks overlooking gaps that local civil society organisations are better placed to identify and address. The following chapter explores good practices that demonstrate how Ukrainian CSOs already play a pivotal role in cash assistance, highlighting their contributions and the added value of locally driven solutions.

## 4. GOOD PRACTICE FOR LOCALLY-LED CASH<sup>36</sup>

This chapter explores the central role local CSOs play in delivering humanitarian cash assistance. It examines their proximity to communities, their ability to navigate local systems, and their growing leadership in aid coordination. Through case studies and examples, the chapter highlights how CSOs leverage trust, collaborate with local authorities, and develop flexible, community-driven approaches to aid delivery. We draw examples from key informant interviews (KIIs) conducted with humanitarian actors involved in the cash response (see Annex 1: Methodological Note).

Ukrainian CSOs possess several critical strengths that contribute to their unique value in humanitarian cash assistance programmes. Stakeholders have different perspectives on “core value,” which are illustrated by a distribution of coded text segments across the different KII participant groups in the figure 1 below.<sup>37</sup>

All stakeholder groups clearly recognise Ukrainian civil society organisations' proximity to conflict-affected people, ability to respond swiftly and their deep contextual knowledge. International NGOs, donors, and coordination bodies all recognise and value the access Ukrainian CSOs have to communities that may otherwise be hard to reach. While donors and INGOs perceive these organisations as well-versed in the country’s social protection system, the CSOs themselves do not emphasise this as a core strength. Similarly, coordination bodies recognise the leadership potential within Ukrainian CSOs, although this perspective is not commonly self-reported by the organisations themselves.

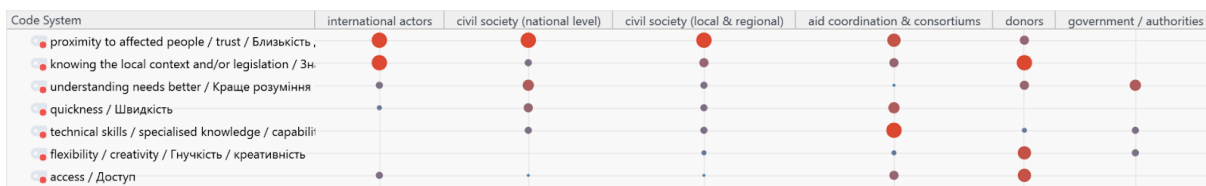


Figure 1


<sup>36</sup> Good practices in locally-led cash solutions encompass both formal and informal approaches: while some initiatives are embedded within structured partnerships, others rely on grassroots networks, community-led initiatives, and informal collaboration.

<sup>37</sup> The visual representation of coded responses highlights how different stakeholders perceive strengths of local CSOs. The visual displays the seven most frequent code categories. The overall frequency of each code category is visible by the ranking of the rows, ranking strengths by their frequency in descending order. The size of the symbols reflects the frequency within each participant group. This means that the symbol size is relative to the code frequencies per participant group, allowing for easy comparison of the most frequently mentioned strengths within each category. The greater a symbol in a column, the more frequently a strength has been mentioned within the respective participant group. Differences in symbol size across groups do not necessarily reflect greater overall frequency, as the size is relative to each specific group.


## 4.1 Proximity to communities: Leveraging trust and local networks

### 4.1.1 Closer to the people: Listening and referring

One of the most frequently cited strengths of Ukrainian CSOs is their close connection to the communities they serve. Participants consistently noted that local organisations possess a profound understanding of the needs, priorities, and vulnerabilities of the population. Unlike international organisations, which often operate at a distance, local CSOs are deeply embedded in the communities they serve. Many have been present for years, building long-standing relationships that foster trust and credibility. This trust enhances community engagement, facilitates coordination, and improves the overall effectiveness of cash assistance programmes.


 *Ukrainian organisations tend to be the ones that actually directly communicate with communities. And I think that's really advantageous. They're able to get that direct information and get us real time information.*

**Donor participant group**

 *The strength of local partners – and at the same time their primary characteristic – is their locality: they are community representatives, often very close to or part of the community.*

**International NGO participant group**

In many cases, local CSOs are both service providers and part of the affected communities. This deep-rooted presence fosters strong relationships and trust, which participants identified as a key advantage. This trust also enhances engagement, as communities are more likely to seek support from and cooperate with peers. As **a Roma-led organisation with deep community ties, the local CSO Blago** has played a crucial role in ensuring that Roma IDPs have not been overlooked in cash assistance efforts. Many Roma families faced barriers to accessing aid, including lack of information, digital exclusion, and mistrust of institutions. Blago’s trusted position within the community meant that people were more likely to engage with the assistance process, even when they were hesitant to register through official channels.

 *Our uniqueness lies in the fact that we, as a Roma organisation, were able to provide assistance, albeit small, to Roma families [...]. For the Roma community, information travels faster through us than through the internet.*

**Local CSO participant group**

By proactively identifying and guiding aid recipients, Blago has ensured that aid providers could effectively reach and support an otherwise marginalised group.

This proximity to affected people allows local CSOs to identify gaps in service provision that larger organisations or governmental programmes may overlook. Many CSOs self-reported that they have frequently witnessed specific groups being excluded due to rigid targeting criteria determined by the international partner/donor, which can lead to critical unmet needs within communities. National actors that are already in touch with affected communities can help present available programmes to those in need and assist in filling out the required forms. One aid recipient explained as follows:

**||** *[The volunteers] who help – they are all good people. Their specialist fills out all the documents. For example, when I come with my family, I already have printed forms, I give them to them, they fill them out themselves and sign*

**Aid recipient group discussion participant in Mykolaiv oblast**

**4.1.2 No one left behind: The power of local networks to access hard-to-reach people**

One strength our participants identified was the ability of local CSOs to operate in areas that are difficult or unsafe for larger organisations to access. Unlike international NGOs or UN agencies, which often face security restrictions, local CSOs can often reach frontline areas and hard-to-access communities and ensure aid is delivered.

**||** *Local organisations have better access. One thing we've seen is that some areas that were previously accessible are no longer accessible. And so these organisations would have a better idea of how to either continue to reach those areas or how to adapt under those situations.*

**Donor participant group**

As such, local CSOs play a critical role in reaching remote and underserved areas, even in more stable regions, where large international actors may not operate due to logistical or financial constraints. This ensures that vulnerable groups, including bedridden individuals, older people, and those living in rural areas, are not excluded from assistance.

**||** *We went to beneficiaries who were sick; we even had bedridden beneficiaries and pensioners. For those who live far from the town of Vyzhnytsia, we organised our visit to register them for assistance. This is inclusive, because it was difficult for many people to come to us.*

**Local CSO participant group**

## 4.2 Working with local authorities for greater impact

Through the deep community connections described above, CSOs help vulnerable individuals navigate complex bureaucratic processes and ensure they access the state support to which they are entitled. Informal referral networks have proven essential, as many local CSOs direct beneficiaries to social protection offices when they identify cases eligible for government aid.

"

*If there is a beneficiary coming for cash registration, and they see that this family is eligible to receive social protection benefits but is not receiving them, they can refer them to the local authority or another service provider.*

**Coordination/consortium participant group**

These referrals function both ways. In some cases, local authorities refer individuals to NGOs for short-term cash assistance when social protection mechanisms fall short. One humanitarian worker explained as follows:

"

*We had an experience where local authorities referred cases to us, and we referred cases to them. MPCA can be a temporary solution, but for sustainability, families need to access social protection.*

**International NGO participant group**

A recent study found that “recipients of humanitarian aid benefit from higher coverage by state programmes on average when compared to the population at large.” The study links this to observations that “humanitarian organisations often supplement aid provision with counselling on state social protection and assistance with application procedures [...], likely the primary reason for the improved coverage observed.”<sup>38</sup>

Local authorities support aid actors by helping with implementation and coordination, and strengthening community trust. Local authorities assist with informational campaigns and aid recipient selection, serving as intermediaries between aid organisations and vulnerable populations. Their involvement “builds trust among beneficiaries,” an international NGO participant explained, and enhances the legitimacy of aid efforts, fostering stronger community acceptance.


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<sup>38</sup> Fastovets et al. December 2024. [“Access Study: Understanding Effective Coverage and Barriers to the Ukrainian State Social Protection System.”](#) See also Ground Truth Solutions. September 2024. [“Strengthening systems so people can take charge.”](#)

*Many people, when providing their data for registration, are concerned about the safety of their information. Local authorities can act as trusted representatives who reside directly in the community where we implement the programme. They can confirm that we are indeed representatives of the organisation and that we are providing cash assistance. This helps reassure aid recipients that everything is legitimate, and that the registration process is safe.*


**International NGO participant group**

Additionally, authorities contribute logistical support to local CSOs including by offering municipal resources, covering utility costs, and providing infrastructure assistance. Some local officials even take proactive measures to ensure aid reaches those in remote areas, going beyond administrative duties to facilitate outreach and registration.

 *The local authorities assigned a person to travel to the villages because we couldn't reach people by phone. This person invited them to the registration. So, we never had any problems.*

**Local CoP group discussion participant**

Many humanitarian organisations depend on government data to target aid effectively: “local authorities provided us with lists of people, we submitted them to the [international partner], and then the [international partner], accordingly, responded to the needs of these people,” a local CSO participant explained. Official lists can sometimes be outdated or incomplete, leading to duplications or gaps. **In Poliska, local authorities and CSOs worked together to verify and refine lists, to ensure aid reached those most in need.**

 *The lists contained many errors, but because of strong collaboration [with the local authorities], they sent us draft versions of these lists, and we checked them for mistakes. It was resource-intensive, but it was a good experience.*

**National CSO participant group**

 *We are always in communication and we have agreements with the local authorities. They tell us ‘this community, this gromada, this settlement’ is in absolute need.*

**International NGO participant group**

**In Mykolaiv, the Department of Labour and Social Protection is leading efforts to systemise integrated solutions by establishing a one-stop centre, consolidating cash aid, state benefits, and psychosocial support under one roof.**



*We are building a centre to provide integrated social services. [...] A person will come to this centre, address their problem, and all specialists from various fields will be involved. For example, if a person comes in, they will be informed about cash assistance here, state programmes here, psychological support here, and document processing here. [...] We are currently planning this reform.*

**Local authority participant group**

### 4.3 The survivor and community-led response: A locally driven model for aid

One promising model that gets closer to locally-led cash is the **Survivor and Community-Led Response (SCLR) programme, implemented in partnership with the Romanian branch of the international NGO HEKS/EPER and the local CSO AREAC**. This enables communities to take an active role in shaping their own recovery efforts. Three key elements make this a good practice in localising humanitarian response. First, a defining feature of the SCLR approach is that so-called *initiative groups* are made up of affected community members. In the Ukrainian context, these groups typically consist of IDPs and local residents working together to address shared challenges, with IDPs typically comprising at least 50% of participants. These groups identify their own priorities and develop projects ranging from community repair work to psychosocial support initiatives. Many are formed in shelters, dormitories, and religious institutions where IDPs naturally gather, allowing them to quickly mobilise and submit proposals. Second, each SCLR incorporates hands-on facilitation and capacity-building. Many initiative group members have no prior experience in project management or grant writing; this requires additional support. Local facilitators – typically individuals with deep community knowledge – provide hands-on guidance throughout the process. They organise online consultations, walking applicants through budgeting, proposal writing, and implementation steps. This ensures that groups have the skills needed to not only secure funding but also successfully deliver and sustain their projects.



*The facilitator remained in contact with them and was aware of all project details since they submitted a monthly report. This report included a table detailing how much money had been spent, what had been purchased for the project, which activities had been implemented, whether the project progress matched the initial proposal, whether there were any deviations, what caused them, and how we would adapt to any challenges. This ongoing monitoring was conducted monthly by the facilitator. [...] On average, a facilitator would visit once a month to attend project-related events, inspect repair works, or speak with local residents benefiting from the grant.*

**Local CSO participant group**

Third, because projects are designed by those directly affected, they are rooted in the realities of daily life and embedded within the social fabric of communities. Many of these groups have continued operating beyond the initial grant cycle, demonstrating the long-term sustainability of this model.

*SCLR is not about distributing food or repairing shelters. It is about investing in people who will stay in these communities, develop them, and have a relatively safe place to live.*

**Local CSO participant group**

By enabling local actors to flexibly allocate resources based on contextual needs, rather than predefined sectoral divisions, this SCLR programme, which was funded by Swiss Solidarity and ACT Alliance, provides a blueprint for a future in which aid is responsive, adaptive, and genuinely led by those it seeks to support. Scaling up this model requires a shift in mindset among donors and international organisations. It means loosening control over aid allocation and trusting communities to determine their own priorities

In 2024, a **Community of Practice for Ukraine Community-led initiatives**, such as the SCLR, was created, associated with the Cash Working Group and co-led by Christian Aid and DanChurchAid. The aim is to facilitate peer learning among actors involved in community led-initiatives, to raise awareness within the cluster system and the donor community, and develop overview tools such as mapping, reporting, and indicators.<sup>39</sup>

#### 4.4 The Ukraine Humanitarian Fund

The **Ukraine Humanitarian Fund (UHF)** has emerged as a key enabler of local humanitarian action, directly supporting national local actors to enhance their role in humanitarian response, as well as their operational capacity. Unlike traditional donor mechanisms that often channel funding through international organisations, the UHF prioritises direct funding for local partners, allowing them to move beyond subcontracting roles and become independent implementers.<sup>40</sup> This shift has significantly increased the number of national organisations applying for and managing their own programme funds, reinforcing their ability to lead response efforts. One participant observed the following:

*UHF is giving strong prioritisation to local partners, and I believe that this is the only funding mechanism at the moment that can directly fund local organisations. I see that many that were implementation partners are now applying separately for the fund. This speaks volumes.*

**Coordination/consortium participant group**

<sup>39</sup> Cash Working Group. July 2024. "Terms of Reference for Ukraine Community Led Initiatives – Community of Practice."

<sup>40</sup> "Direct submissions from eligible national NGOs, including women-led and women rights organizations, and submissions from eligible international NGOs with sub-implementing partnerships with national and local partners, including CSOs and volunteer groups providing last-mile humanitarian assistance in targeted communities, will be prioritized." OCHA. 2024. "Ukraine Humanitarian Fund 2025 First Standard Allocation Strategy."

In 2024 alone, national NGOs received \$72.9 million as primary recipients, 45% of the total \$162 million that donors have channelled through the fund (see Figure 2 below for a detailed funding breakdown). While most funds still flow directly to international NGOs (52%) or United Nations agencies (3%), the trend indicates a significant increase in the proportion allocated to national actors: in 2023, direct funding to Ukrainian actors accounted for 21%, following a similar rate of 23% in 2022.<sup>41</sup>

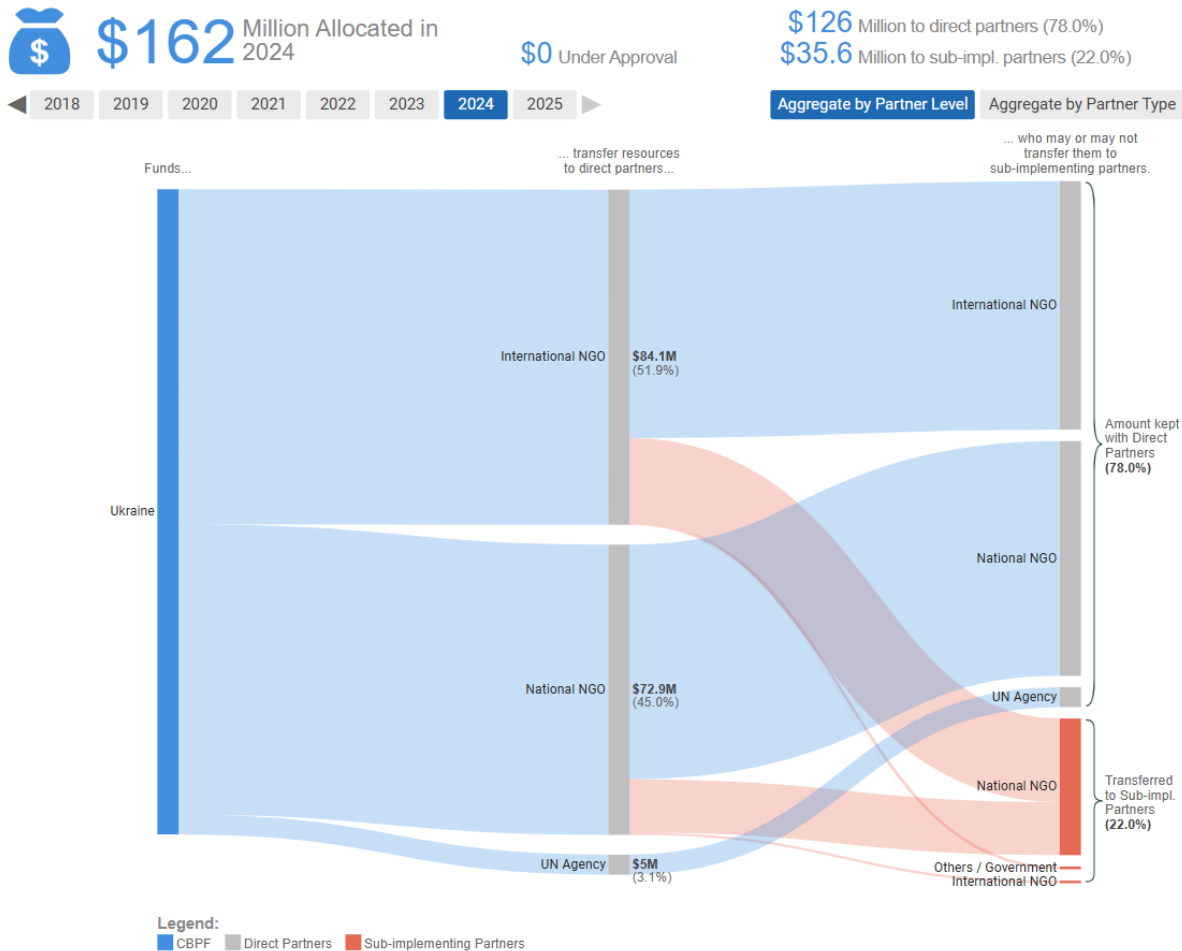


Figure 2. OCHA CBPF data hub.

One notable strength of UHF funding is its role in building the institutional capacity of local organisations. Many Ukrainian CSOs initially struggled to meet the formal requirements of international donors, such as

<sup>41</sup> OCHA. 2024. "Country based pool funds data hub."

HR policies and compliance frameworks, but UHF funding allowed them to invest in internal development. This approach ensures that local actors not only receive funding but also gain the necessary expertise to sustain their humanitarian work in the long term.

**||** *During our initial simplified assessment, there were areas in which we didn't meet the requirements for HR policies, for example. We hadn't needed formal HR files before. [...] But it was required, so we sought consultations, used the available 7% for development, and got everything in order.*

**Regional CSO participant group**

With localisation established as a key secondary objective under the Global CBPF Global Guidelines, the UHF developed a strategy note in January 2024.<sup>42</sup> This note builds largely on the review of a \$20 million funding envelope launched in 2022, which enabled over 300 small local CSOs to provide contextually relevant humanitarian assistance in frontline areas. Acknowledging the challenges reported by Ukrainian CSOs during this review, the localisation strategy prioritises projects that “adopt the principles of fair partnership,” requiring a fair distribution of programme support costs between lead partners and sub-implementing partners. This approach allows local organisations to plan more effectively and facilitate programme continuity, also ensuring that international funding mechanisms genuinely support localisation rather than reinforcing dependency structures.

The review also highlighted that forming partnerships with volunteer organisations is more challenging than with registered CSOs. In response, the UHF aims to provide guidance on contractual arrangements for partnerships with volunteer groups, ensuring that unregistered groups can still contribute to the humanitarian response. Additionally, the fund encourages primary recipients to establish longer-term contracts (six months or more) with CSOs and volunteer organisations.

These efforts foster the development of genuine partnerships – one of the key requests made by participants in our study – and serve as an alternative to direct funding calls, which often face systemic barriers to change.

**||** *If we're not able to really fund local organisations directly at scale, then the role [of us donors] is to push towards more equitable partnerships for the intermediaries and making sure that we require intermediary organisations to pass through overhead funding; to have a good partnership strategy, that the partnerships are of reasonable durations, that partnerships are actually partnerships and programmes are co-designed and developed together.*

**Donor participant group**

<sup>42</sup> OCHA. May 2023, “Country-based Pooled Funds Global Guidelines”.

In addition, national CSOs play a crucial role in shaping the fund’s allocations and decision-making processes. As members of UHF’s advisory board, they help define allocation parameters, and at the operational level, national CSOs are actively involved in project review committees, where they participate in selecting projects for funding.

A key challenge to a locally-led, contextually adapted humanitarian response is the rigid, sector-based framework of the humanitarian system. As a participant explained, the UHF operates within this system, it has attempted to place MPCA at the centre of its cash allocation strategy:

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*[The UHF] said no [to a sectoral cash proposal] because it could be covered by MPCA. [We] adopt a multisectoral approach. (...) [The UHF] don't encourage sectoral cash as much, it prefers multi-purpose cash (...) If a cluster has proposed sectoral cash in the allocation, the UHF always make sure that the cash working group is alright with it.*

Donor participant group

The UHF is now implementing a pilot for area-based allocations where funding decisions on what projects and activities and partners to fund are made at a local level by national and local partners. This area-based coordination support is further strengthened by the UHF’s development of a decentralised field office structure.<sup>43</sup>

Our study identifies three ways the UHF could further deliver on the localisation strategy:

- A greater shift towards direct funding for national CSOs is required, building on the significant progress made in 2024. Compared to other CBPFs, such as Somalia (71% channelled to national NGOs), the UHF has the potential to become more localised.<sup>44</sup>
- The UHF must demonstrate its capacity to react swiftly and appropriately if indicators and means of verification used to track the strategy’s implementation reveal shortcomings – particularly regarding efforts to foster genuine partnerships.<sup>45</sup> Despite national CSOs playing a crucial role in “last mile” delivery, only 25% of UHF funds allocated to INGOs ultimately reach national CSOs (see Figure 2 with UHF funding flow illustration).
- It remains to be seen whether the UHF can significantly scale up its MPCA funding, which lags significantly behind other conventional aid sectors. In 2024, only \$4.8 million – just 3% of total UHF allocations – was directed towards MPCA.<sup>46</sup>

<sup>43</sup> Ukraine Humanitarian Fund (UHF). January 2024. “Localization Strategy Note.”

<sup>44</sup> OCHA. 2024. “Country based pool funds data hub.”

<sup>45</sup> For example, indicators assess whether project prioritisation aligns with the adoption of fair PSC shares, whether partnerships prioritise smaller CSOs and Volunteer Organisations, and whether duty of care packages are received—particularly by partners operating on the front lines.

<sup>46</sup> OCHA. 2024. “Country based pool funds data hub.”

## 4.5 Flexible and locally-led partnerships

Some local CSO participants highlighted flexibility and autonomy in programme design as key factors in achieving equal partnerships. Rather than serving as passive implementers of predefined interventions, these organisations play a central role in co-designing assistance models, allowing them to tailor programmes to the specific needs of their communities. Stellar NGO, Caritas Odesa, and Tenth of April are prime examples of how local actors, when given flexibility, can design cash assistance programmes that better reflect community needs.

### 4.5.1 Collaborative programming with international partners

**Stellar NGO** had long recognised the need to support ex-combatants, specifically those who had been severely injured and were no longer in active service. This group is extremely vulnerable and insufficiently protected, since the state is not yet prepared to provide them with serious support;<sup>47</sup> nor do international or even national organisations fully address their needs. As a result, these individuals often lack even basic informational and financial support.

Stellar NGO had always envisioned a programme that went beyond cash assistance, integrating legal aid, psychological support, and case management to help navigate the bureaucratic and emotional challenges they face. However, this idea was not always actively promoted, as there was an understanding that it might not receive strong backing. The opportunity to develop such a programme emerged during discussions with IRC. In one conversation, it became clear that this approach could be viable. A meeting was scheduled to refine the details and define the targeted group, leading to a shared agreement that the initiative had real potential.

As one team member recalled, "When I heard this with my own ears, I thought – this is incredible. We fully support it in every way possible. Let's start building the project."

Unlike many cash programmes led by UN agencies or international NGOs, where local organisations are primarily implementers, Stellar NGO played an active role in shaping the intervention. Rather than simply executing an existing model, they had the flexibility to propose their own approach. This level of autonomy enabled them to integrate local insights, particularly the need for ex-combatants and civilians with war-related disabilities to access legal assistance for pension and disability status procedures. While donors provided technical guidance on cash distribution, Stellar NGO structured the service model itself, ensuring

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<sup>47</sup> "A key issue for conflict affected people is the delay between the injury of a civilian or combatant, over the collection of necessary documents for registration onto government Social Protection portals, to the actual delivery of Social Protection benefits. This delay hampers affected individuals' ability to adapt to potentially lifelong disabilities, and more complex injuries often require additional time for registration and approval." International Rescue Committee, referring to PeReHID. November 2023. ["PeReHID Initiative Technical Assistance Facility 100 Days Report."](#)

it responded directly to community realities: "I would not say that we felt any restrictions; we felt quite free during the preparation stage of the project itself."

**4.5.2 A locally-adapted rental assistance model**

Unlike other rental support schemes, which often focus on collective centres (CCs), the **rental assistance programme of UNHCR and Caritas in Odesa** was tailored to the local context, where CCs were scarce, and many IDPs needed immediate, independent housing solutions. The rental support was not initially part of the programme design. Instead, it was added as a pilot initiative, reflecting UNHCR’s willingness to adapt based on local realities. The UN agency had previously tested rental assistance in Western Ukraine, but in Odesa, the conditions were different: there were fewer collective centres and a stronger demand for employment. Recognising this, Caritas proposed a locally tailored approach that prioritised newly arrived IDPs who were ready to rebuild their lives:

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*[Looking beyond collective centres] wasn't our proposal initially. We discussed the fact that Odesa does not have as many collective centres as Western Ukraine. We also emphasised that Odesa, being a large city, offers more employment opportunities. In Western Ukraine, there might not be such a significant demand for employment. We took this direction, and the donor liked it because it involved collaboration.*

Regional CSO participant group

Caritas actively partnered with other smaller civil society organisations: by working with specialised groups, Caritas provided targeted referrals, ensuring that aid recipients received appropriate legal aid, childcare services, or business training.

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*I believe the effectiveness of this project lies in the fact that we worked with a large number of civil society organisations, charitable foundations, and volunteers helping IDPs in various directions. One foundation alone cannot address all needs comprehensively; every organisation has its own specialisation, and every family comes with its own unique needs.*

Regional CSO participant group

Aid recipients were not only supported with rental payments but also guided through job searches, benefit applications, and administrative hurdles. The monitoring framework was equally robust, tracking indicators such as employment rates, continued housing stability, and access to legal and social benefits.

Beyond providing immediate housing solutions, the programme also fostered long-term resilience. Caritas case managers acted as mediators when aid recipients needed to relocate, ensuring that transitions between rented apartments were managed smoothly without disrupting financial support. This was particularly important when landlords sold or repurposed their properties, a challenge that many displaced families face. The referral system also played a key role in ensuring continuous support for aid recipients, directing them toward other humanitarian funds and employment programmes as their needs evolved.

#### 4.5.3 Faster aid through local leadership

Another strong model of genuine partnership is the **LIVES initiative**, a partnership led by Mercy Corps in Kherson, Mykolaiv, and the Odesa oblast which is implemented by Ukrainian CSOs and embeds local actors into decision-making, coordination, and implementation of humanitarian cash assistance. Tenth of April, one of the partner organisations, leads needs assessments, data collection, and aid recipient registration, ensuring faster and more contextually relevant aid delivery: cash assistance is activated within 72 hours of a crisis, prioritising areas with accessible banking services. Tenth of April also took over coordination with the CWG – previously facilitated by Mercy Corps – which has led to quicker response times and more accurate targeting. The partnership also involves the establishment of a “structured referral system” that ensures comprehensive support beyond cash assistance: by leveraging Tenth of April’s strong local networks, aid recipients are directed to legal aid, shelter, and psychosocial services, demonstrating a holistic, needs-based approach to humanitarian response.<sup>48</sup>

## 5. GOOD PRACTICES IN INTEGRATING LOCAL CSOS INTO INSTITUTIONAL CASH ASSISTANCE

This chapter examines the evolving role of Ukrainian civil society organisations (CSOs) in conventional humanitarian cash coordination, focusing on their increasing leadership, operational capacity, and engagement in cash assistance programming. It highlights how national-local partnerships have expanded, showcasing good practices in knowledge-sharing, capacity-building, and the formalisation of volunteer networks into structured organisations. Similar to the locally-led good practices presented in chapter 4, the examples presented are drawn from key informant interviews (KIIs) conducted with humanitarian actors involved in the cash response (see Annex 1: Methodological Note)

### 5.1 National-local partnerships

Over the past three years, many organisations have significantly scaled their operations, adapting to the complexities of cash and humanitarian assistance distribution. They have developed expertise in programme coordination, beneficiary targeting, data management, and aid recipient registration. Participants, especially representatives of international NGOs and donors, highlighted that Ukrainian CSOs’ operational capacity in logistics, reporting, and coordination has improved collaboration between international and local actors.

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<sup>48</sup> At the 14 February 2025 workshop, Mercy Corps added that 15 local partners are currently participating in the LIVES initiative, with ten of them rolling out their own community accountability systems, and one delivering the full end-to-end cash response.



*Our chief accountant studied the entire system and figured out that we needed to submit reports for all recipients, enter them into tax reports, include them in registries, and so on. Honestly, we didn't take the risk – we weren't ready to do this in 2023. In 2024, we said, "Let's try." So in 2024, we transitioned to cash assistance.*

**National Ukrainian CSOs participant group**

Ukrainian CSOs take on a vital role in providing guidance to newer or international actors entering their local space. Given their long-standing presence in affected regions, many have accumulated significant experience in programme design, implementation, and troubleshooting. This expertise is often shared through consulting, direct mentorship, and joint strategic planning. “[An international NGO] reached out to us in 2023 when they entered Mykolaiv, asking what they should do and where. We developed a strategy for them, and they were grateful and began implementing it,” one participant recounted. Such collaborations reflect the pivotal role of local organisation beyond implementers, being key knowledge holders shaping broader interventions.

Many Ukrainian CSOs have undergone a fundamental shift in their mission and focus, incorporating humanitarian assistance into their existing areas of work. Organisations that previously focused on women’s empowerment, education, or human rights, have expanded their scope to respond to urgent humanitarian needs since the start of the war.



*The reorientation of local civil society toward the humanitarian response happened very clearly in Ukraine. Many organisations that were originally, let's say, feminist organisations working on women's empowerment, also took up humanitarian work, responding to needs in their areas.*


**Coordination/consortium participant group**

Local CSOs often acknowledge their increasing proficiency in cash assistance, but also reflect on the cost of this growth. Many stressed that they were "pushed" into these roles out of necessity, taking on responsibilities without prior experience but driven by the urgency to support their communities. Some note that, while they have developed significant expertise, cash programming is not necessarily where they would have chosen to focus.

One promising practice is the progressive responsibility taken by strong national organisations in supporting and mentoring smaller local CSOs. This model has proven crucial for increasing the sustainability of aid efforts, strengthening local ownership, and ensuring that smaller organisations gain the skills and resources needed to operate independently, within the aid system.<sup>49</sup>


<sup>49</sup> While these efforts are deeply connected to locally-led humanitarian response, they also play a key role in institutionalising cash assistance by integrating local actors into the formal aid system. By strengthening the capacity of national and local CSOs, these initiatives help bridge the gap between grassroots humanitarian action and conventional sectoral frameworks, equipping local

One example of this is the work of the **organisation Right to Protection (R2P)**, which has evolved from being both a direct implementer and an implementor of full-cycled cash projects to playing a knowledge-sharing and capacity-building role. R2P has leveraged its experience to train and mentor smaller organisations, equipping them with the technical knowledge and tools needed to run cash assistance programmes. R2P’s capacity to provide cash training was enabled by the Cash Training for Trainers model, piloted in Ukraine and Romania by CCD member agencies. It has since been widely rolled out through the cash-specific local Community of Practice in partnership with R2P. It provides a structured learning pathway, equipping national partners with the knowledge and skills to implement high-quality cash assistance programming in line with international standards. The programme focuses on technical training, mentorship, and hands-on implementation support.<sup>50</sup>

 *We are now trusted, and we share our expertise. Last year, we attended CALP [Cash Learning Partnership Network] trainings on cash assistance, and in October of this year, we conducted our first training sessions, covering CVA theory and sharing our own experience. We showcased our dashboards, methodologies, and project planning approaches.*


**National CSO participant group**

This represents a critical turning point in Ukraine’s humanitarian landscape – one where local professionals are not just implementers but also leaders in knowledge-sharing and capacity-building, reducing reliance on external experts. One leader of another national CSO emphasised this shift:

 *For scaling, we no longer need to invite, for example, foreign trainers. We can independently train people using cases, we can clearly explain to them.*

**National CSO participant group**

National organisations also lead on strengthening aid efforts through the formalisation of volunteer efforts into structured CSOs. In communities where no CSOs previously existed, Caritas Odesa worked with active volunteering groups to establish new, legally recognised groups, by providing training on grant-writing and financial independence. Rather than fostering dependency on a single donor (Caritas), the organisation focused on equipping local CSOs with the skills needed to secure diverse funding sources. By building the financial and organisational capacity of small local actors, Caritas Odesa has helped them become more autonomous, ensuring they are sustainable beyond the presence of international funding.



organisations with the technical knowledge, compliance skills, and operational structures required to navigate the formal humanitarian system.

<sup>50</sup> Scott, J. Collaborative Cash Delivery (CCD). 2024. “[Localisation pilot model in Ukraine. Reflections from the Global cash trainer of trainers.](#)”

*In two communities where there weren't any CSOs working in this area but where there were active volunteers, we managed to establish CSOs. It was difficult, but for me, it was very important. If there aren't people in the communities willing to drive change, our visits and programmes will always come to an end. But it's good when there are people who want to continue working in this direction and supporting their communities. [...] The goal isn't for them to always rely on Caritas. It's to help them understand that, even if they're located far away from Odesa, they can write grant applications and realise that there are far more opportunities than just a few large foundations.*

**Regional CSO participant group**

Within the SCLR programme presented earlier, seven NGOs in different communities of Chernivtsi oblast have been founded or have resumed their activities.

**||** *The foundation of civic activity lies in these initiative groups, the activists who work voluntarily, inspire their communities, and are eager to take action. Within our programme, we decided to support the creation of civil society organisations. If an initiative group successfully submitted a proposal, secured a microgrant, and completed a project, we provided legal consultation and support to help them formally establish a CSO. Without this, they wouldn't have been able to continue – without legal registration, they couldn't access further funding.*

**Local CSO participant group**

While these new NGOs still operate largely on a volunteer basis, their creation marks an important shift toward locally-led humanitarian response. The combination of financial assistance, mentorship, and skills development has enabled these new CSOs to build confidence and take ownership of their role in local resilience efforts.

**5.1.1 Stronger local representation, more efficient aid delivery**

The increase in the number of local CSOs has direct, tangible benefits for the effectiveness and speed of cash assistance delivery. As one humanitarian actor observed, “The presence of local partners accelerates the process of individuals receiving cash assistance from the humanitarian sector. As the number of local partners increases, it expedites access to cash support for people overall.” Rather than relying solely on international actors, investing in national-local partnerships leads to a more responsive and adaptable aid system.

Locally-led cash solutions are also evolving through a growing, formalised network of national and community-based organisations. Initiatives like the **cash-specific CCD Community of Practice (CoP), or the Alliance of Ukrainian CSOs, and the National Network of Local Philanthropy Development** are working to improve coordination, amplify local voices, and advocate for greater inclusion in humanitarian assistance. Since its creation in 2024, the **CoP** has expanded from 18 to nearly 60 organisations, strengthening peer learning, capacity-building, and advocacy efforts among local humanitarian cash actors in Ukraine. This initiative, a collaboration between the Collaborative Cash Delivery (CCD) Network

and Right to Protection, backed by the CWG, is a dedicated platform for local CSOs involved in cash programming. It offers a space for discussing cash, promoting local CSO involvement, and fostering collaboration and capacity building.<sup>51</sup> And **the Alliance** has been praised for its role in amplifying the voices of local organisations, fostering stronger coordination, and advocating for increased inclusion in humanitarian response mechanisms. With 16 core members and an extensive network reaching across most oblasts in Ukraine, the Alliance has positioned itself as a key local actor in shaping aid efforts. One participant applauded the network as “great allies” conducting pivotal work by being vocal about the need for local leadership. In collaboration with key national and international stakeholders, the Alliance spearheaded the development of the *Locally Led Response Strategy in Ukraine (2024–2029)*, which provides a roadmap for shifting decision-making, coordination, and funding toward Ukrainian actors.<sup>52</sup>

However, there are still challenges in the inclusion of smaller, local-level organisations in such national coordination efforts. Concerns about representation persist, with some local actors struggling to enter key alliances: “We applied [to the NGO alliance], but we didn’t get a response, so we didn’t make it as a local organisation collaborating with them” (Regional CSO participant group).



*There still isn’t really one cohesive national-level coordination body. The Alliance is starting that process, but it’s still very small and Kyiv-focused. I’m not sure how much buy-in they have from community-based organisations at the oblast level. How can you bring the voice of the partners at a field level to this coordination forum at a Kyiv level?*

**Donor participant group**

## 5.2 Increased visibility and participation in formal aid structures

Participants highlighted concerted efforts which aim to empower Ukrainian CSOs to take a more active role in decision-making rather than serving solely as implementing partners. The Cash Working Group (CWG) has embraced a more inclusive approach, incorporating simultaneous translation and opening spaces for local actors. “The Cash Working Group has progressed significantly in terms of engaging more national and local actors by opening the space and providing simultaneous translation,” one participant observed. This shift has resulted in greater visibility and increased leadership roles for Ukrainian NGOs. **The Ukrainian Red Cross Society is now co-chairing the CWG.** Additionally, **Right to Protection is co-leading the Protection Cluster**, reinforcing the presence of national actors in critical coordination structures. Other participants, however, highlighted that there are still challenges with local voices being heard in these forums. One participant told us, “At the moment, the situation is that, frankly speaking, the cash coordination and all the kind of recommendations and decision-making at the Cash Working Group level is quite dominated by international actors.”

<sup>51</sup> Collaborative Cash Delivery. 2024. “[Local NGO community of practice.](#)”

<sup>52</sup> Alliance of Ukraine Civil Society Organizations. 2023. “[Locally-led response strategy in Ukraine.](#)”

Engagement in these structures does not necessarily translate into full access to humanitarian response processes, though clusters often function as exclusive spaces, where only those with existing connections can meaningfully participate. Some local organisations remain unaware of basic coordination tools, such as mapping dashboards listing which organisations cover which communities. One national CSO member highlighted this gap:

*On the donor side, funds are given directly to organisations with the expectation that they will coordinate with the cluster, such as the Shelter Cluster. On the implementation side, organisations often don't know whom to contact, whom to seek approval from, or how to engage with communities.*

**National CSO participant group**

### 5.3 Reducing the bureaucratic burden

A significant challenge for local humanitarian actors is the repetitive and resource-intensive nature of due diligence and capacity assessment procedures. International aid actors highlighted the **harmonisation of due diligence and cash capacity assessment tool** developed by the Collaborative Cash Delivery (CCD) Network as a good practice for progressively transferring responsibilities to local organisations.<sup>53</sup> This tool reduces duplication, ensuring that once an organisation is vetted, its accreditation is recognised by multiple donors. It also helps identify areas for improvement, allowing for targeted capacity-building efforts to strengthen local NGOs' cash programming capabilities.

*We conducted an assessment with partners that already had experience working with us [on non-cash aid]. [...] With this capacity assessment, we identified areas for capacity enhancement and targeted support. By the second half of the year, they will be able to directly transfer the money to the aid recipients.*

**International NGO participant group**

A structured, step-by-step approach is used to transition local partners from basic roles to full cash transfer management, moving beyond registration to independent programme implementation: (i) assessment of partner readiness, using the CCD tool to identify capacity gaps in SOPs, taxation, monitoring, finance, and data protection; (ii) phased capacity transfer, starting with registrations, then gradually building skills for direct cash distribution; (iii) hands-on mentorship – a "hand-in-hand" approach where international actors provide progressive support, fading into the background as local partners gain confidence. After successfully piloting this model with three organisations, expansion to new partners now

<sup>53</sup> CCD. 2023. "Harmonised Tools | Collaborative Cash D."

includes one in Sumy. This adaptive approach ensures sustainability, reinforcing local capacity for long-term impact.

Participants also highlighted the **Charter for Change due diligence passporting initiative**, which is a global financial tool designed to support locally-led development.<sup>54</sup> This “passporting” system allows local NGOs to complete a single due diligence process, which can then be accepted by multiple donors and organisations, eliminating the need for repeated assessments for each new partnership. By reducing bureaucratic barriers, these harmonisation initiatives increase access to funding, strengthen local ownership, and facilitate faster, more effective humanitarian response efforts. The ongoing advocacy push to ensure wider uptake of these tools by donors, UN agencies, and international NGOs is essential in order to scale this approach globally. If fully embraced, such mechanisms could make funding more accessible and allow local NGOs to focus on what truly matters: delivering aid to those who need it most.

## 5.4 The role of referrals

Informal referrals are crucial to ensure that people in need obtain support, whether by aid actors or the state. In many cases, successful cooperation with local authorities is based on personal trust and established networks rather than bureaucratic mandates. One CSO representative described how their long-term presence in the community helped smooth interactions:

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*Some of the contacts were formed earlier, thanks to our previous work. Those who have remained from that time know us well, and our communication is already based on personal relationships.*

**National CSO participant group**

Referrals between national and local CSOs that provide assistance is a common practice. Many civil society organisations do not implement cash assistance programmes in isolation but operate within a broader social support system. When people require additional services – legal, psychological, or medical – CSOs direct them to the appropriate specialised organisations. "If we encounter a complex situation, we refer people to Right 2 Protection or other organisations that can provide the necessary assistance. We provide contacts, search for useful information, explain where to turn, and how to proceed," noted one CSO staff member. Rokada, as a social partner, facilitates the resolution of issues related to access to healthcare, education, and other basic services. Thanks to such cooperation, CSOs are indispensable in ensuring a holistic approach to assistance.

Formal referral mechanisms within cash assistance are also evolving. **The CWG has launched a task team looking into establishing a pilot referral system that allows organisations to transfer MPCA cases to one another when they are unable to provide assistance.** This initiative is co-chaired by

<sup>54</sup> Humentum. [“Charter for Change due diligence passporting initiative.”](#)

Dobra Fabryka and Save the children and aims to create a structured approach to referrals within the humanitarian response, with plans to expand the system across sectors, including social protection.<sup>55</sup>



*Right now, we're piloting our internal system for multi-purpose cash assistance – transferring from one organisation to another. Potentially, we want to share this mechanism across sectors. The next step would be with the social protection system, so we can interact and transfer specific cases to each other.*

National CSO participant group

## 6. LOCALLY-LED SOLUTIONS: CHALLENGES

This chapter explores key challenges that hinder the effective implementation of locally-led cash solutions in Ukraine. Drawing from KIIIs conducted with humanitarian actors, the findings highlight tensions between international programme design and local implementation, the tendency of donors to prioritise frontline areas, and structural obstacles to aligning humanitarian cash assistance with government-led social protection. The chapter further examines challenges at both national and local levels, including data-sharing issues, and the need for more adaptive approaches to cash programming. While Ukrainian CSOs play a critical role in aid delivery, restrictive funding models and bureaucratic hurdles continue to limit their autonomy and effectiveness.

The visual representation of coded responses in the figure 3 below highlights how different stakeholders perceive barriers to enhancing locally-led cash solutions.<sup>56</sup>

International actors and donors acknowledge that funding constraints impact local actors and they recognise the importance of upholding humanitarian principles. National CSOs express concerns that programmes are often pre-designed by international partners, limiting their ability to tailor interventions to local needs while they also struggle with funding-related challenges. Local CSOs strongly criticise the tendency of donors and international NGOs to prioritise frontline programmes, which they believe overlooks other critical areas of support. Meanwhile, aid coordination bodies and consortiums emphasise the need to uphold humanitarian principles but also highlight the tensions between internationally set priorities and the realities of local implementation.

<sup>55</sup>Dobra Fabryka Ukraina. February 2025. “Referral Tool, System overview.” “Referral Tool Induction.”

<sup>56</sup> The visual representation of coded responses highlights how different stakeholders perceive challenges to locally-led cash solutions in Ukraine. The visual displays the four most frequent code categories. The overall frequency of each code category is visible by the ranking of the rows, ranking challenges by their frequency in descending order. The size of the symbols reflects the frequency within each participant group. This means that the symbol size is relative to the code frequencies per participant group, allowing for easy comparison of the most frequently mentioned challenges within each category. The greater a symbol in a column, the more frequently a challenge has been mentioned within the respective participant group. Differences in symbol size across groups do not necessarily reflect greater overall frequency, as the size is relative to each specific group.



Figure 3

## 6.1 Preconceived programme design by international partners

The disconnect between international aid structures and local actors has generated frustration among Ukrainian CSOs. An open letter to international donors and NGOs by Ukrainian actors put it more bluntly, saying, “Stop trying to build our capacity,” calling it “nonsense” and reiterating this demand:

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*We think it is international NGOs that often need to build their own organisational capacity and knowledge about our context, our networks and what a locally rooted civil society looks like long term. Maybe you can translate some of our resources into English to better understand our knowledge and existing approaches.*

National CSO participant group

One of the most significant challenges for local actors is the top-down nature of programme design led by international partners, which is largely shaped by donor priorities and political considerations rather than direct input from affected communities. International actors define programme frameworks – outlining objectives, target groups, eligibility criteria, and implementation modalities – before engaging local civil society organisations. As a result, local civil society organisations are left to implement these predefined approaches with limited flexibility to adapt to the evolving needs on the ground. This lack of flexibility hinders the ability of local actors to leverage their context-specific knowledge and often leads to programmes that do not fully address the needs of affected populations.

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*In reality, we implement a project that the donor [international NGOs or UN agencies] writes. From the start, we are given the rules of the game – which communities, which region, which district, and how many beneficiaries we must serve. At the beginning, we can sometimes negotiate to add a community or change something, but not the number of beneficiaries. And we always have to work within these rules.*

Local CoP group discussion participant

Local actors frequently witness cases where predefined programmes fail to adequately address the needs of people who fall outside of rigid templates and eligibility criteria. Participants reported instances where international agencies rejected requests to adjust eligibility criteria, resulting in exclusions of vulnerable groups who did not meet predefined indicators. They told us that there is the tendency for assistance to be repeatedly distributed to the same demographic groups, reinforcing perceptions of unfairness and

inequitable aid distribution. Participants recalled that in some communities, residents have expressed frustration at seeing the same categories of people – such as pensioners, large families, and people with disabilities – receiving repeated assistance, while others, like young adults, feel ignored.

**||** *For [communities], it's a 'headache.' [...] They are saying, 'Again, pensioners, again large families, again people with disabilities, and we, the young people, get nothing.' It's a standard situation.*

**International NGO participant group**

These concerns highlight how pre-set targeting criteria can create tensions within communities, potentially undermining social cohesion and trust in humanitarian efforts. The insistence on pre-set criteria also creates frustration among local actors, who see first hand the need for greater flexibility in response approaches.

**||** *A person might have lost their home in a fire but lacks the necessary paperwork to prove disability or property ownership, which disqualifies them from receiving help. In cases like these, flexibility is crucial, and I hope we can advocate for this in the programmes we implement. However, I'm unsure if we can achieve it with donors providing cash assistance, as they often have their own statistics [on which they base decisions] and rigid criteria.*

**Local CSO participant group**

**||** *The programme defined 'vulnerable' based on strict criteria such as disability or displacement status. We had many cases where people clearly needed help, but because they didn't meet the exact criteria, they were left out. This created frustration both among the affected community and our team, who had to deliver difficult news.*

**Local CSO participant group**

**||** *Our team identified an urgent need for winterisation support in a new location, but because our programme budget was locked into predetermined categories, we couldn't allocate funds for this priority.*

**Regional CSO participant group**

This is exacerbated by the observation that many humanitarian and social protection programmes use overlapping targeting criteria, leading to coverage gaps.<sup>57</sup>

**''** *At the moment, unfortunately, we face the reality when the targeting criteria both for social protection and also for multipurpose cash are quite similar, and that causes several categories of vulnerable groups to be left behind.*

**Coordination/consortium participant group**

Participants from local CSOs emphasised that earlier and more meaningful inclusion in the design phase would lead to interventions that are better adapted to local contexts, enhancing both targeting and cash delivery. The lack of consultation prevents them from applying their first-hand knowledge of community needs, ultimately limiting the overall impact of cash assistance programmes.

**''** *We need to be part of the design process, not just the implementation. When local actors are involved from the beginning, we can help identify needs, propose practical solutions, and make sure that resources are used more effectively.*

**Local CSO participant group**

**''** *One of the things we've seen is that some areas that were previously accessible are no longer accessible. And so these organisations would have a better idea of how to either continue to reach those areas or how to adapt under those situations.*

**Donor participant group**

## 6.2 The tendency to prioritise frontline programmes

Local CSOs in Ukraine have highlighted donors' and the United Nations' leadership's tendency to prioritise frontline regions, often at the expense of long-term support in other areas. As one CSO leader put it, "For donors, it's 'trendy' to provide aid to Eastern frontline regions." Many local CSOs reported that funding has overwhelmingly shifted to the east, leaving western and central regions struggling to maintain essential services. About 90% of international organisations / UN agencies, and from 2025 even more – are closing down here. They are leaving the western region, but many vulnerable people who were evacuated here have remained," noted one regional CSO representative.

<sup>57</sup> This has also been discussed in the forthcoming *Value for Money* study: targeting category overlaps create duplication and leave others in need out. See Charlot and Young. forthcoming. "PeReHID Value for Money Assessment."

This focus on frontline areas also limits local actors’ ability to tailor responses to evolving community needs. Some CSOs have attempted to advocate for broader funding distribution, particularly for rehabilitation, medical assistance, and integration programmes, but have seen their proposals rejected.

**||** *[Our project partners] ask us, ‘What do people want to use the money for?’ and we tell them – medical supplies, rehabilitation equipment. But they respond, ‘No, we cannot finance that area. It does not fit our programme conditions.’*

**Local CSO participant group**

This frontline bias also makes it very difficult to properly implement programmes enhancing community-rooted and led initiatives, such as the Survivor and Community-Led Response programmes mentioned in chapter 4.3.

**||** *We have to mention the tendency of donors to fund initiatives and projects close to the war line. [...] We were told that maybe we could implement an SCLR approach close to the war, but it’s not really possible because there are different needs. They are not really able to secure all the materials needed, and we cannot monitor them properly.*

**International NGO participant group**

The emphasis on high-intensity conflict zones means that funding rarely supports community-driven solutions, as local organisations are left without the flexibility or stability required for long-term, locally-led interventions. As a result, efforts to shift power to local responders are hindered, reinforcing dependence on externally-led humanitarian structures.

## **6.3 Aligning with the government-led social protection systems<sup>58</sup>**

### **6.3.1 Gaps at national level**

The Ministry of Social Policy (MoSP) has initiated efforts to establish a comprehensive registry of war-affected individuals, aiming to streamline aid distribution and ensure assistance reaches those in need, and provide assistance through social programmes, compensation, and psychological support.<sup>59</sup> Humanitarian actors and civil society were engaged in the process to develop this registry. Still, many affected individuals are left outside the official state system. Without formal registration, these individuals struggle to access government support, and humanitarian organisations providing them aid risk facing legal and taxation hurdles.

<sup>58</sup> This theme was not coded under the “challenges” category, as it was part of a separate coding framework used in the analysis.

<sup>59</sup> On January 18, 2025, Law No. 4071-IX came into effect, establishing the State Register of Persons Affected by the Armed Aggression of the Russian Federation Against Ukraine (Victims' Register).



*The state has already created a registry of victims, but the Ministry of Social Policy is now taking over that responsibility. The issue is that we need to focus on the people that the state doesn't identify yet and help those people get into the registry, so that they can receive the help they need. This is the most critical issue.*

**National Authorities/Social Protection participant group**

A similar misalignment is evident in the stalled development of the digital “eDopomoga” portal. eDopomoga is a result of collaboration between the humanitarian sector and government bodies, and an attempt to connect state, volunteer and international organisations, with the aim to oversee aid applications by war-affected populations, and verify data through state registers to avoid duplication.<sup>60</sup> The platform aims to facilitate aid requests and match individuals in need with available resources. But one participant explained that the idea of matching individual requests for assistance with individuals/volunteers, as well as with organisations looking to provide help, fails to address all requests, and that the ministry overseeing the platform lacks resources, staff, and funding to properly manage the system.<sup>61</sup>

Participants also questioned the readiness of the social protection system to be sufficiently shock-responsive, in order to independently address large-scale humanitarian needs. This echoes a recent PeReHID-commissioned study: while the government has prioritised continuity of funding to existing social protection programmes and rapidly introduced shock-responsive IDP payments and war-related disability payments, the lack of fiscal space due to the requirements of the war effort have meant that the government has been unable to effectively cover new and increasing needs. This means the humanitarian response has continued to fill in the gaps.<sup>62</sup>



*Not everyone thinks that the state capacity is ready to take over the workload of humanitarian aid. [...] From my perspective, there is currently no stability, not even close.*

**National CSO participant group**



<sup>60</sup> Lomonosova, N. January 2025. [“In search of the progressive paths to rebuild Ukraine. Mapping challenges and priorities in social policy.”](#)

<sup>61</sup> The “eDopomoga” platform lacked detailed vulnerability data essential for humanitarian decision-making and could not be updated to reflect the evolving conflict. Misconceptions arose among applicants, many believing that registration guaranteed aid. Additionally, inconsistencies between government databases, which used individual taxpayer identification numbers, and humanitarian systems, which assessed needs at the household level, created distribution challenges. Concerns over impartiality, especially in contested areas, further complicated implementation. By October 2022, application processing was suspended, and many humanitarian organisations ceased using the platform. Dekamps, C. Woborski, L. et al. August 2024. [“Coordination and complementarity of humanitarian cash assistance programs and the social protection system in Ukraine.”](#)

<sup>62</sup> Charlot and Young. forthcoming. PeReHID Value for Money Assessment.


*I would be cautious about transferring the entire cycle to social protection agencies. Most social workers lack the appropriate background or training in accountability or working with vulnerable populations. Although they ideally should possess these skills, not everyone is prepared to fully follow protection procedures.*

**Coordination/consortium participant group**


The UK FCDO and the MoSP have launched the SPIRIT programme, an initiative designed to strengthen Ukraine’s social protection system to enable it to better respond to the evolving needs of Ukraine’s population. The programme aims to increase inclusivity and the shock responsiveness of the system. The programme aims to bolster the capacity of the Ministry of Social Policy by providing technical assistance to support social protection reform. Under the newly reinvigorated Social Protection Working Group, MOSP, the UK and UNICEF will also explore opportunities to increase the system’s ability to respond to shocks and support ongoing efforts to strengthen linkages between humanitarian cash assistance and government-led support mechanisms.<sup>63</sup>

**6.3.2 At local level**

At the local level, the most frequent challenge observed by participants revolved around data-sharing. They said that many local authorities are hesitant to share information about aid recipients, due to concerns around data privacy, political interference, or a lack of trust between humanitarian actors and municipal administrations.

 *I remember an incident where colleagues mentioned that [some cities] do not always want to provide lists with people’s data because this involves sharing personal information after missile strikes. For example, last summer, after a strike, the district head outright refused information sharing to all organisations, saying that his office would not provide any lists. As a result, all organisations declined to register people there.*

**National CSO participant group**

 *There were instances where we needed beneficiary lists for coordination, but access was either denied or highly limited due to privacy concerns. Without shared information, it’s difficult to verify whether aid recipients have already received support through other channels.*

**National CSO participant group**

<sup>63</sup> The government of the United Kingdom. February 2025. [“The UK launches flagship SPIRIT programme to drive social recovery in Ukraine.”](#)

Some UN agencies have successfully accessed this information through government decrees. For instance, UNICEF secured full access to recipient data – including household composition, phone numbers, and full names – by directly requesting a government decree from the Ukrainian Parliament and Cabinet of Ministers. This decree not only facilitated UNICEF’s initial cash assistance programme but was later amended in February 2024 to expand eligibility to additional recipients in Donetsk.<sup>64</sup> Local actors often lack the political influence and institutional leverage to obtain similar approvals, leaving them reliant on informal networks and inconsistent cooperation from authorities.

In general, however, local CSOs make use of strong, informal ties with local authorities to work together in providing the most relevant aid possible. Problems arose more often when local CSOs felt constrained to interact with a higher administration level, lacking strong institutional back-up to prevail.

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*Perhaps the coordination challenge was not so much with local authorities but with higher-level coordination. For example, when we needed some information – either from the CNAP or from the social security office – there was no way to get the current data at that time. [...] When we needed up-to-date information, we couldn’t provide it because that kind of statistics exists only in state institutions. Then [our international partner] would ask, ‘you said there were so many people in need, but where are they? Looks like you’ve lied to us.’*

**Local CSO participant group**

## 7. INTEGRATING LOCAL CSOS INTO CONVENTIONAL CASH COORDINATION: BARRIERS AND HESITATIONS

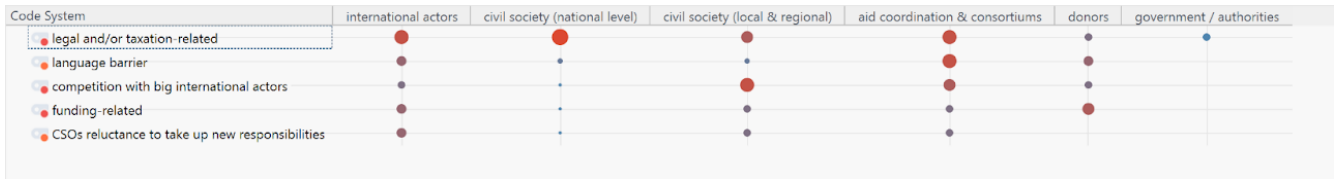
This chapter explores the key barriers preventing the full integration of local civil society organisations (CSOs) into the conventional humanitarian cash coordination. Based on KIIs with humanitarian actors, the findings highlight legal and taxation challenges, funding constraints, language barriers, and coordination difficulties that limit the role of local actors in cash assistance efforts. Local CSOs face structural disadvantages compared to international organisations, including complex financial compliance requirements and competition for funding, while also struggling to navigate bureaucratic procedures that delay emergency responses. The chapter also examines how technical and institutional capacity gaps hinder the ability of local CSOs to meet donor requirements and participate in coordination mechanisms.

In the figure below, the visual representation of coded responses highlights how different stakeholders perceive barriers to localising cash assistance efforts.

International actors and donors highlight legal and taxation-related challenges while also raising concerns about language barriers and funding difficulties. National CSOs placed a particularly strong emphasis on

<sup>64</sup> Charlot and Young. forthcoming. “PeReHID Value for Money Assessment.”

legal barriers, which emerged as a dominant theme in discussions on localisation challenges. Local CSOs, in addition to legal issues, also stressed the competition with international actors, which they see as a significant obstacle to accessing funding sources.<sup>65</sup>



## 7.1 Legal, taxation and regulatory barriers combined with complex procedures

Legal, taxation, and complex financial and regulatory requirements remain some of the most significant barriers to national CSOs taking on leadership roles in cash assistance programmes. While many organisations have the capacity to implement aid, they are discouraged from engaging in full-cycle cash assistance delivery due to unclear tax policies, stringent donor requirements, and the burden of financial accountability.

One of the primary concerns is taxation implications. Ukrainian tax regulations often classify humanitarian cash assistance as taxable income, creating financial risks for both recipients and the organisations distributing aid. While some corrective guidelines have been introduced, inconsistencies in tax interpretations continue to create uncertainty for Ukrainian CSOs. They face a disproportionate burden compared to international actors; the latter often operate as non-resident entities, so are thus exempt from local tax rules. Ukrainian CSOs are legally required to report detailed aid recipient information to tax authorities. In some cases, local CSOs have even had to act as tax agents, paying taxes on behalf of recipients. As such, Ukrainian CSOs express hesitation in leading cash assistance programmes due to legal risks.

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*We cannot provide this assistance directly because if a person has a tax code, the money would be subject to an 18% tax. [...] International donors are unwilling to see one-fifth of their aid, which is already limited, go toward taxes.*

National CSO participant group

<sup>65</sup> The visual representation of coded responses highlights how different stakeholders perceive challenges to localising cash assistance in Ukraine. The visual displays the five most frequent code categories. The overall frequency of each code category is visible by the ranking of the rows, ranking challenges by their frequency in descending order. The size of the symbols reflects the frequency within each participant group. This means that the symbol size is relative to the code frequencies per participant group, allowing for easy comparison of the most frequently mentioned challenges within each category. The greater a symbol in a column, the more frequently a challenge has been mentioned within the respective participant group. Differences in symbol size across groups do not necessarily reflect greater overall frequency, as the size is relative to each specific group.

Efforts are being made to address these obstacles through capacity-strengthening initiatives and advocacy for clearer tax regulations and reporting requirements. Some actors are working to demystify legal processes and encourage local organisations to participate in cash programmes despite these challenges. The cash working group, for example, is preparing explainers on taxation specifically for local CSOs to help them better understand reporting obligations and exemptions. However, without systemic changes to legal and tax policies, these capacity-building efforts can only partially mitigate the barriers faced by local actors.

**||** *There are a number of obstacles, such as taxation, but we regularly hold educational events to help them understand, and we also assist the UHF in showing them how to present things properly, to explain that there is nothing to fear and that they should go ahead and do cash.*

**Coordination/consortium participant group**

Beyond taxation, CSOs cite complex financial compliance requirements as a major deterrent. Many organisations report that navigating donor regulations, financial reporting, and national legislation is overly complex, creating a significant barrier to scaling up cash assistance efforts. The risk of legal or financial missteps is particularly concerning, as non-compliance – whether intentional or not – can result in severe consequences.

**||** *For funds to go through us, we need to have an excellent understanding of our legislation and how it works. [...] The intersection of reporting requirements – how they are demanded here versus there – needs to be clear, including issues around taxation. [...] It's something that needs a lot of clarity. Honestly, I'm not 100% confident about this yet. It's an area that needs further study.*

**National CSO participant group**

The weight of financial accountability is another significant challenge. Handling large-scale cash transfers directly requires extensive administrative capacity, which many local organisations feel unprepared for. The fear of mishandling funds or failing to meet donor compliance standards discourages some civil society organisations from assuming direct responsibility for cash transfers.

**||** *Still, the idea of having funds transferred to my account and being solely responsible for distributing them is what holds me back personally.*

**National CSO participant group**

In some cases, international partners have had to retain control over cash disbursement processes due to legal barriers that prevent local partners from handling transactions independently. This has limited the extent to which national and local actors can lead cash assistance initiatives.

*As [my colleagues] mentioned about our national partner, a great deal of work was done to evaluate their capacity to implement this pilot project. Following this, the decision was made that our national partner could implement it independently. Unfortunately, due to certain legal nuances, our national partner was unable to conduct the bank transfer independently, so the responsibility remained with us.*

**Local CoP group discussion participant**

## 7.2 Funding constraints

Funding remains a central challenge in the localisation of humanitarian cash assistance in Ukraine. CSOs often struggle to access direct funding due to donor policies favouring large, well-established international actors. One participant to our group discussion with the local CoP noted, “I think it is very difficult to compete with giants in the humanitarian field. Large organisations that are well known – if they enter a community, then we have no role there, so to speak.” Many donors continue to favour international organisations that have a proven track record in other crises, making it difficult for local actors to establish themselves as lead implementers. This preference is often rooted in concerns about risk management and trustworthiness: donors perceive international organisations as having more robust financial systems and accountability mechanisms, which aligns with their risk aversion strategies. This perception leads to a cycle where local organisations are overlooked, hindering their capacity development and perpetuating reliance on international entities. One donor representative explained:

*We have our instruction from parliament to work through the big established, well-known organisations and have few but large agreements. That’s the only way we can manage it with a reasonable administration. [...] It is quite clear that we’re supposed to have a small portfolio in the sense that there should be few agreements and that we should work due to risks of different kinds, that we should work primarily through well-known robust international partners.*

**Donor participant group**

This structural preference for established international actors prevents local CSOs from receiving direct funding and developing sustainable financial models. This phenomenon is well-documented, and alternative models, such as those proposed in the SPACE Framework, seek to address this imbalance by “redesigning delivery models, redefining key grant functions to enhance local leadership.”<sup>66</sup> But even when funding is available, inconsistencies and unpredictability create additional barriers. Local organisations

<sup>66</sup> Venton and Pongracz. 2021. “[Framework for shifting bilateral programmes to local actors.](#)”

frequently face funding gaps between projects, making it difficult to maintain trained staff and operational continuity.

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*Financial sustainability was another challenge: paying salaries consistently, maintaining staff, and covering fuel and vehicle repair costs. I know of several small organisations in Odesa that will likely close soon. They had good potential, strong ideas, and their own target audiences, who will now be left without that support.*

**Local CSO participant group**

The competitive nature of the sector, particularly when securing funding and retaining experienced staff, creates additional challenges for CSOs. As international organisations enter the space with more substantial financial backing, local NGOs struggle to match salaries and benefits, leading to frequent staff turnover. As one workshop participant, representative of a national consortium, explained, "The loss of expertise when funding pouring into the east stopped abruptly led to local actors joining bigger NGOs. Retaining expertise is essential – we need to ensure we have qualified staff working on cash assistance."

The recent funding cuts from USAID and others could push donors to seek more cost-efficient, locally-led solutions, as studies have shown that direct funding to national actors can reduce overhead costs and improve aid delivery efficiency. On the other hand, the cuts may reinforce existing donor preferences for well-established international partners, as risk-averse funding policies could lead to a further concentration of resources within international NGOs and UN agencies, side-lining local CSOs from direct financial flows.

### 7.3 Language barriers

In the humanitarian response in Ukraine, coordination meetings, guidance documentation, and funding applications are predominantly in English. As such, local actors often struggle to access critical information about funding opportunities, technical guidance, and operational updates due to language barriers. This is also true for capacity-building initiatives, as training materials and workshops are often conducted in English. As such, meaningful participation, already restricted by a top-down approach used by some international partners, becomes almost impossible, resulting in missed opportunities to voice local perspectives, share insights, and contribute to decision-making processes. There is a need for a greater shift toward Ukrainian as the primary language in coordination spaces, with translation available for non-Ukrainian speakers.

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*Many organisations closed down [in the second year of the response]: when it came to grant writing, they lacked the knowledge, particularly in English, which led many to shut their doors.*

**Local CSO participant group**



*It's already 2025, and some of these people still have no connections within the coordination system, partly because they don't understand key documents that are only provided in English.*

**National CSO participant group**



*Even when we attend training sessions, the trainers speak in English, and sometimes we can't follow. This makes it hard to apply what we've learned.*

**Local CSO participant group**

## 7.4 Coordination bottlenecks: A slow emergency response and exclusion of local actors

Despite ongoing efforts to localise humanitarian coordination structures, many local actors remain sidelined from the formal coordination system. This can lead to inefficiencies in efforts to reduce duplication. With multiple actors operating in the same regions, instances arise where aid recipients receive aid from more than one source while others remain underserved. Building Blocks, a blockchain-based system developed by WFP to prevent duplication, has proven effective, yet challenges remain. The system is primarily used for MPCA, and local actors often face barriers in accessing and utilising it for deduplication. Instead, they rely on informal networks to verify whether aid recipients have already received assistance.



*The coordination challenges in the sectoral cash programmes are among the most complicated. With MPCA, this is more or less resolved, there are occasional cases of duplication, but they are within statistical error, if some building block doesn't identify.*

**International CSO participant group**

Some organisations have sought to address this by manually cross-checking aid recipient lists and strengthening coordination through sectoral clusters. However, not all actors are equally integrated into these systems. A representative from a local CSO, acknowledged this issue for local CSOs: “Since we’re relatively new to the cash assistance sector, we’re not yet fully familiar with other actors who might also be registering beneficiaries.”

This coordination issue also hinders local CSOs to access information and key contacts. Some only learn how to engage with humanitarian coordination through informal channels. “We couldn’t implement a winterisation project in Kharkiv because we didn’t know who to coordinate with,” one local actor shared. “Only after attending training from another national CSO did we finally understand who was responsible

for firewood distribution.” The lack of accessible coordination spaces leaves many local organisations disconnected, limiting their ability to align aid efforts and advocate for their role in the response.

**”** *Some of these people still have no connections within the coordination system. Perhaps there should be more offline events, at least for networking, where implementing organisations can get to know each other and meet coordinating bodies.*

**National CSO participant group**

We also came across cases where successful integration into formal coordination structures have at times hindered rather than facilitated effective and rapid emergency interventions. In Rapid Cash programmes, designed to quickly provide cash following crises such as missile strikes, local organisations often face delays due to procedural barriers. These rigid coordination structures prioritise process over speed, limiting local organisations’ ability to deploy aid when it’s needed most.

**”** *When we worked in the Donetsk region, there was a missile strike, and within an hour, local authorities called us to register people. They already had a ready list, and we were ready the next day. But there is a procedure that, as a local organisation, we cannot initiate this just because we can. We must first inform the donor. The donor then submits the information to the Cash Working Group. But in the Cash Working Group, there is a list of organisations that deploy for Rapid Cash registration, and there is an order in the queue. [...] Two organisations declined. [...] We lost about five or six days before cash assistance actually reached people.*

**Local CoP group discussion participant**

## 7.5 Internationally-defined ‘Capacity gaps’ can hold local actors back

Many local organisations, while highly effective in outreach and direct aid delivery, struggle with meeting donor compliance requirements, financial reporting, and coordination structures. While local actors are adapting (see chapter 5.1), the gap between institutional procedures and grassroots realities remains a challenge.

**”** *They are used to doing things one way – quickly distributing, and then that’s it, they forget about it. We say, ‘No, that approach doesn’t work.’ And then conflicts arise.*

**International NGO participant group**

Some also lack critical institutional frameworks, such as Standard Operating Procedures (SOPs) and financial management policies, making it harder to absorb larger grants. This impacts their ability to comply with donor requirements, limiting their direct access to funding and keeping them dependent on intermediary INGOs.



*During one of our training sessions [with local organisations], we asked who had documented SOPs for their financial processes – out of 18 participants, only three raised their hands. They are managing without formalised procedures, which is a major gap.*

**National NGO participant group**

Additionally, many CSOs lack exposure to international humanitarian standards, as teams are largely composed of national staff without prior experience in the conventional aid coordination system, lacking technical knowledge on areas like large-scale cash programming, or specialised sectors such as shelter, and WASH. This makes it difficult to implement projects in line with humanitarian standards, which may or may not make sense in their contexts.



*They're not able to properly classify [technical projects] or they might do it in a way that's not in line with the guidelines, that's not accountable to Ukrainian building legislation.*

**Coordination/consortium participant group**



*In [our organisation], for example, we don't have any foreigners working with us. Sometimes I think it would be great if someone with that experience worked with us.*

**National CSO participant group**

The technical nature of coordination discussions can exclude local CSOs from meaningful participation, as these conversations often assume prior experience in complex aid mechanisms and sector-specific language and standards. “We ask people to share challenges, and they start to share, but then we start discussing all these technical things, and local organisations are not necessarily the ones having experience in that,” a working group lead explained.

One barrier for local CSOs accessing coordination structures is a lack of sufficient staffing. Many operate with project-based teams, and without dedicated external engagement staff, engaging in coordination structures becomes an added burden for project staff, limiting their ability to actively participate in decision-making spaces.



*You don't have those people that can spend all day going to coordination meetings. [...] participation is a bit more difficult.*

**Donor participant group**

## 8. RECOMMENDATIONS TO IMPROVE ACCESS, INFLUENCE AND PARTICIPATION

The final set of recommendations is the result of an iterative, participatory process, incorporating perspectives from a range of stakeholders.<sup>67</sup> Each recommendation is accompanied by specific actions for different actors, including donors, international partners, local authorities, and Ukrainian CSOs themselves, outlining the practical steps needed to achieve meaningful progress in localising cash assistance. They are structured across global, national, and local levels, addressing the key barriers identified in previous chapters. A detailed explanation of the methodology used to gather these insights can be found in Annex 1.

### Global level

#### 8.1.1 Creating a level playing field: rethink financial systems

**Why this matters:** Current donor proposal assessments are skewed toward international NGOs and UN agencies that can deliver at scale and at speed with minimum risk and as little as possible administrative cost for the donor. The criteria that would enable local actors (government or non-government) to compete on a level playing field are not used (access, sustainability, etc). As one international NGO representative pointed out, “If we want to train partners, we need to pay for that, we need to provide money and time. But value for money means how many beneficiaries you reach most generally.” As such, there is no level playing field: the current aid system prioritises quantity over quality and sustainability, and often disregards the experience and perceptions of aid recipients. In the context of cash assistance in Ukraine – and in humanitarian settings globally – counting numbers often pushes for fast implementation at scale, forcing organisations to prioritise speed and coverage over tailored, context-sensitive assistance. As one national CSO noted, decisions are often made based on what “looks good for donors” rather than what is practical or effective in reality.

#### One stakeholder, one action:

- **Donors:** Require funding proposals to demonstrate how they contribute to meaningful localisation rather than focusing solely on short-term, risk averse criteria. Funding mechanisms should incorporate indicators that reflect long-term investments in local capacity, including training, staff retention, and organisational development. Ensure funding criteria consider not just financial capacity but also a proven commitment to fostering collaboration

<sup>67</sup> Following the initial analysis phase and advisory group discussion, ten core recommendations were identified. However, while these recommendations were well-grounded in participant data, they often lacked specific, actionable steps. To address this, participants in the workshop on 14 February 2025 critically examined the existing good practices and explored how to scale them up. They also reviewed the preliminary recommendations, providing comments and suggesting concrete actions. New recommendations also emerged from the discussions. The updated recommendations were then taken into a second round of discussions during the CCD Local Community of Practice localisation workshop on 20 February 2025. Local Ukrainian CSOs which are engaged in cash assistance programming reviewed the list, suggested additional actions, and refined the wording of several recommendations to ensure clarity and relevance.

- with smaller local actors. Strengthen financial systems to enable more flexible and sustainable funding models, such as improved pooled fund mechanisms that could be scaled up.
- **International partners:** Embed localisation principles into funding applications and programme design by budgeting for the leadership development of local organisations. Take on more responsibility as an intermediary that strengthens local actors. Establish mechanisms for joint decision-making to ensure local actors have a meaningful role beyond token participation.
  - **Ukrainian CSOs:** Highlight and showcase ongoing good practices, providing evidence-based examples demonstrating how local leadership enhance the effectiveness, reach, and sustainability of assistance, strengthening the value-for-money (VfM) case.
  - **Donors and implementing organizations:** Prioritise investing in well-designed, independently led consultation and feedback studies, (e.g. user journey research), to assess the effectiveness of cash assistance from the perspective of the people it aims to support. These studies should be independent, methodologically sound, and incorporate both quantitative and qualitative data to capture the true impact on recipients. The findings should be integrated into the Humanitarian Country Team and Humanitarian Needs Response Plan discussions to ensure that future cash assistance programming is people-centred, responsive, and accountable. This will help amplify recipients' voices and contribute to shifting power dynamics in aid delivery. These insights can serve as an advocacy tool for the Humanitarian Country Team to engage with donors, governments, and other stakeholders to advocate for necessary policy adjustments and systemic changes that better support people-centered humanitarian action.

*Many of the 'expats' involved [in the response] are unfortunately disconnected from the local context. Their knowledge is often theoretical, possibly drawn from other countries or general humanitarian frameworks. The decisions they make frequently require us to push back against them, as they are not relevant to the current situation. It is disappointing when someone who has been working in the field for years makes a decision that looks good for donors, [...] but you cannot justify it in practical terms.*

**National CSO participant group**

**8.1.2 Deliver on promises: Fund fairly and transparently**


*Increasing transparency of funding flow*

**Why this matters:** Greater financial transparency enhances accountability, strengthens trust, and ensures equitable funding distribution. When financial flows are clear and publicly available, local CSOs can advocate more effectively for fair funding allocation and meaningful participation in humanitarian


response. Transparency also aligns with global commitments, such as the Grand Bargain, which emphasises greater visibility of financial flows to local actors.

**One stakeholder, one action:**

- **Donors:** During the independent audits of fund distribution, ensure accountability and equitable resource-sharing and proactively share the results. Require international partners to disclose financial breakdowns in their reporting, ensuring donor-submitted reports are shared with all partners.
- **International partners:** Publish detailed funding allocation reports in a way that is more publicly accessible, specifying amounts received and redistributed to local partners. Ensure regular updates on Grand Bargain commitments, reflecting improvements in transparency.

 *UN agencies do not disclose how much money they allocate to local actors. Transparency should be a non-negotiable requirement.*

**Donor participant group**

 *The Grand Bargain committed to financial transparency 13 years ago. INGOs and UN agencies should fulfil their commitments.*

**Donor participant group**

## 8.2 National level

### 8.2.1 Prioritising advocacy over operational control

**Why this matters:** International actors – especially donor governments and United Nations agencies, but also international NGOs – should shift their focus from direct implementation to strategic advocacy and policy engagement. While their operational role was crucial in the early phases of the war, continued dominance in aid delivery risks side-lining national CSOs, which are fully capable of providing services and delivering cash assistance. At the same time, critical policy-level reforms, such as taxation frameworks, social protection alignment, and national aid registries, remain stalled due to a lack of coordinated advocacy efforts. International actors have the diplomatic leverage and access to decision-makers that local actors often lack. Instead of leading aid operations, they should use their influence to push for systemic improvements that will enable long-term, locally-led solutions. They also should use their influence to open the doors of advocacy spaces to local organisations, support national coordination platforms, ensuring their voices are heard. Examples of where advocacy is needed include: the stalled national registry of war-affected individuals, which still leaves many vulnerable people outside formal aid

systems; the closed E-dopomoga platform, which has failed to meet its objectives due to lack of dynamism, integration and oversight; and taxation and legal barriers, which continue to hinder cash assistance and locally-led aid delivery.

**One stakeholder, one action:**

- **Donors and international (funding) partners:** Use diplomatic influence to advocate for national coordination improvements and policy reforms that enable national CSOs to lead. Whenever possible, promote local representation in donor forums, advisory bodies, and policy discussions.
- **International (operational) partners:** Use institutional influence to advocate for pressing points raised by national partners, whether through conversations with Ukrainian ministries or with donor governments. Ensure consultation with local CSOs ahead of high-level meetings.
- **Ukrainian CSOs:** Strengthen collective advocacy through coalitions and direct engagement with international partners and donors to push for policy shifts and greater decision-making authority. Use case studies and data-driven evidence to demonstrate the impact of local leadership and funding barriers.



*International organisations should be advocacy-oriented, not operationally dominant.*

**Local CSO participant group**

**8.2.2 Continue strengthening national leadership in the coordination system: Promote use of the Ukrainian language**

**Why this matters:** Significant progress has already been made in strengthening national leadership in coordination structures. National actors are increasingly taking on co-chair roles, and measures such as increased real-time translation, the development of glossaries, and technical training have helped bridge gaps in accessibility. However, more changes are still required to ensure national actors can fully participate in decision-making and strategic coordination.

**One stakeholder, one action:**

- **Coordination leadership:** Ensure that key documents, funding calls, reports, and coordination materials are consistently available in Ukrainian. Increase the number of national and local CSOs in leadership positions in clusters, working groups and other coordination bodies.
- **Donors and international (funding) partners:** Within teams, assign national focal points for communication with local CSOs, ensuring consistent engagement in Ukrainian. Advocate for the inclusion of Ukrainian as a working language and push for mandatory Ukrainian

translations in international humanitarian forums. Strengthen collective advocacy for mandatory Ukrainian translations in international humanitarian forums.

- **Local and national CSOs:** Link local actors with coordination-specific training opportunities to enable greater leadership within co-chair arrangements and cluster coordination roles.



*I think that would be an opportunity: trying to get local voices at co-coordinator and coordinator levels. That's something that is being discussed.*

**Donor participant group**



*One of the ideas was to have two local CSOs as co-chairs [of consortiums instead of an international organisation, which would be a strong transition toward a more locally-led approach. But for this to happen, we need to start now, raising and building capacities of local CSOs, ensuring they have dedicated experts and human resources available.*

**Coordination/consortium participant group**

### 8.2.3 Fair and diversified funding

*Continue funding and localising the Ukraine Humanitarian Fund*

**Why this matters:** The Ukraine Humanitarian Fund (UHF) has played a crucial role in supporting local actors, allowing them to access flexible funding and build their capacity. By introducing an additional 7% project support cost, UHF has enabled organisations to invest in infrastructure, training, and audits – critical elements for long-term sustainability.

**One stakeholder, one action:**

- **Donors:** Commit to sustained and increased funding for UHF, ensuring national NGOs have direct access to flexible financial resources.
- **Coordination bodies:** Promote UHF opportunities and provide technical support to local actors to enhance their ability to apply for and manage funding.
- **National and local CSOs:** Strengthen internal financial management systems to meet donor compliance requirements, ensuring long-term sustainability and increased access to funding streams.
- **UHF:** In collaboration with the CWG, strengthen the UHF's First Standard Allocation Strategy to ensure a massive shift towards direct funding for national CSOs. Strengthen capacity to react swiftly and appropriately if indicators and means of verification used to track the

strategy's implementation reveal shortcomings – particularly regarding efforts to foster genuine partnerships.<sup>68</sup>

**||** *[The UHF] works very closely with the cash working group, as seen for the development of its allocation strategy, for example. [...] [The UHF] relies on the cash working group's advice.*

**Donor participant group**

**||** *UHF was one of the first to introduce an additional 7% for development. With those funds, we've done things like renovate spaces so people can come and sit in warmth and comfort instead of standing outside. We've also been able to fund courses and audits with this support. It's been a tremendous help, allowing us to grow, strengthen our capacity, and apply for more significant projects.*

**Local CSO participant group**

*Diversifying funding sources*

**Why this matters:** Reducing reliance on a shrinking traditional humanitarian funding stream will enhance the financial sustainability of local CSOs. Expanding funding channels, such as social service provision, can help secure long-term roles in cash programmes and foster mutually beneficial collaboration with authorities.

**One stakeholder, one action:**

- **Donors:** Support mechanisms that enable local CSOs to provide services to the government, including grant structures that incentivise long-term partnerships between CSOs and state institutions.
- **International (operational) partners:** Support capacity-building initiatives that help local CSOs position themselves as long-term service providers rather than short-term project implementers. This could include training on grant applications, facilitating partnerships with private sector donors, and supporting advocacy for sustained government engagement.
- **Local CSOs:** Explore alternative funding sources through the private sector, charitable foundations, and government service contracts. Engage authorities on providing social services, including harmonising aid recipients databases, training government staff on cash programming, and sharing best practices.

<sup>68</sup> UHF. 2025. "First Standard Allocation Strategy."

**||** *The government should create mechanisms to ‘buy services’ from NGOs that are agile and operationally efficient.*

**Donor participant group**

**||** *We need funding models beyond short-term humanitarian aid.*

**Local CSO participant group**

*Extending project periods for local CSOs*

**Why this matters:** Sustainable funding models enable local CSOs to invest in long-term capacity-building, ensure operational stability, and maintain their credibility within communities. Short-term funding cycles create instability, making it difficult for local CSOs to plan, retain staff, and sustain operations between projects. This uncertainty also affects trust – one of the key strengths of local CSOs – as communities may question their long-term reliability.

**One stakeholder, one action:**

- **Donors and international (funding) partners:** Showcasing trust in local organisations by shifting toward multi-year funding commitments to provide local organisations with greater financial stability, enabling long-term planning, capacity strengthening, and more effective programme implementation.
- **National and local CSOs:** Develop multi-year strategic plans to demonstrate long-term impact and sustainability. Strengthen financial reporting and management capacity to better justify overhead costs and advocate for fair cost-sharing arrangements.

**||** *Core cost support allows local CSOs to become strong designers of cash assistance interventions.*

**Coordination/consortium participant group**

**||** *We are grateful that certain programmes allow donors to provide additional funding after a project, which can be used for organisational development. We want to use these resources effectively to strengthen our capacity, possibly hire a few specialists outside of specific project funding, and create better working conditions for our team – especially for office staff, since most of our team consists of field workers who provide direct assistance to people.*

Local CSO participant group



*A three-to-five-year project would make a huge difference. The current short-term nature of projects forces constant uncertainty and limits our ability to deliver high-quality assistance.*

Local CSO participant group

### 8.2.4 Strengthening nationally-led consortiums

**Why this matters:** Significant efforts are already underway to strengthen the recognition of local actors in the humanitarian response. First, consortiums like the Collaborative Cash Delivery (CCD) network play a crucial role in enhancing locally-led responses and fostering partnerships between international and national cash actors. Second, large national organisations, such as Right to Protection (R2P), Dobra Fabryka, Proliska, the Ukrainian Red Cross, and Caritas Ukraine, have the capacity to manage large-scale funding and implement complex programmes. Capacity-building initiatives have enabled these national organisations to mentor and support smaller CSOs, strengthening the overall national humanitarian ecosystem. This initial situation needs to be capitalised on.

**One stakeholder, one action:**

- **Donors and international (funding) partners:** Promote national NGO-led consortiums that prioritise local leadership. Provide clear guidelines on forming consortiums, emphasising the necessity of locally-led leadership and funding multi-year system-strengthening projects.
- **International partners:** Consider a “gradual fade” approach, in which international organisations shift to support roles in consortiums, focusing on areas of comparative advantage (e.g., advocacy) while reinforcing, not dominating, coordination structures. Support the transition by participating and facilitating matchmaking events, and providing technical support for national CSOs to take on leadership roles.
- **National CSOs:** Take an active role in mentoring and funding smaller CSOs, ensuring that partnerships are equitable and not merely subcontracting relationships. Introduce advisory boards within consortiums to ensure accountability and meaningful participation of local actors.



*If possible, donors should encourage the creation of consortiums led by local NGOs, rather than INGOs. INGOs can still be part of the structure, but leadership should be in the hands of Ukrainian organisations. Humanitarian funds should be dominantly focused on local pooled funds.*


Consortium/coordination participant group

### 8.2.5 Develop genuine and strategic project partnerships

**Why this matters:** Beyond just project-based partnerships, including CSOs in strategic partnerships ensures that their deep understanding of local social, political, and economic dynamics is leveraged at a higher level in shaping overall strategic priorities and long-term goals. Involving local organizations in both the planning and decision-making processes, from the outset, enhances the relevance and ownership of initiatives, fosters long-term collaboration, and ensures that they are active partners in shaping not only the delivery but also the broader strategic direction of programs, rather than being passive implementers.

**One stakeholder, one action:**

- **Donors:** Establish or further support funding mechanisms that prioritise locally-led initiatives and include provisions for knowledge exchange events and capacity-building tools. If initiatives are to remain internationally or nationally-led, require them to be co-led with local actors, ensuring local expertise is embedded in design and implementation.
- **International partners:** Require local CSO participation in funding proposals and project design. Allocate funding for HR dedicated to leadership and policy engagement, facilitate peer-to-peer learning exchanges, and support co-led project proposal initiatives that promote shared ownership. Offer training on partnership and consortium work.
- **National CSOs:** Design ways to enhance representation in decision-making spaces that make sense for the size and scope of the organisation (where applicable). This might mean dedicated staffing or coordinating with other organisations on who is best to represent local interests in which space.

 *International organisations/UN agencies say, ‘We are not donors, we are partners,’ but in reality, they are far away doing their own thing, while we are doing ours. I think what we lack with donors is empathy. It would be amazing if we had a real ‘friendship.’*

**Local CoP group discussion participant**

 *Local CSOs should participate in programme design and apply for donor funding in consortiums.*

**International NGO participant group**

## 8.3 At local level

### 8.3.1 Improve local authorities' involvement in cash programmes

**Why this matters:** Local authorities already play a key role in implementing cash programmes, yet their involvement in programme design and cash programme alignment with social protection systems remains limited. Many Ukrainian CSOs and international NGOs report increasing difficulties in collaborating and exchanging data with regional and national authorities. Strengthening the role of authorities at all levels will enhance coordination, improve needs assessments, and optimise service delivery for vulnerable populations.

**One stakeholder, one action:**

- **Donors and international (funding) partners:** Support integrated cash and social service initiatives that integrate local social workers into cash assistance, ensuring structured referrals. NGOs can provide financial assistance while social services address other vulnerabilities, ensuring a holistic approach.
- **International (operational) partners:** Facilitate knowledge-sharing initiatives and ensure meaningful participation of local authorities in coordination bodies and clusters, when appropriate.
- **National and local CSOs:** Advocate for formal collaboration agreements with local authorities to strengthen social protection alignment. Work alongside authorities to develop and implement community-based social service initiatives.
- **Local authorities:** Establish dedicated focal points for cash assistance coordination. Develop joint initiatives with CSOs to fund and deploy community-based social workers and establish referral pathways for vulnerable populations.

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*With a good social service, there could be much better collaboration. For instance, NGOs have the capacity to provide cash assistance, to support a family so it doesn't fall into a crisis, and on the other hand, the social service, which is better aware of the family's specific vulnerabilities, could support them and provide the appropriate services.*

**Local CSO participant group**

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*I think local authorities can be much more involved in such socially oriented cash projects.*

**National CSO participant group**

### 8.3.2 Rethink communication with communities

**Why this matters:** Access to accurate and timely information is as critical as the aid itself. Yet, as many crisis-affected people have pointed out, inconsistent communication, unreliable sources, and digital barriers often prevent people from learning about available support. To tackle information issues observed by aid recipients, information-sharing must be rooted in trusted, community-based structures.

**One stakeholder, one action:**

- **International partners:** In addition to digital platforms, support communication strategies that prioritise trusted, locally embedded channels. Work with local councils, CSOs, and village groups to ensure information reaches those most in need.
- **Local CSOs:** Act as bridges between communities and aid providers, using existing local networks to share trusted information. Advocate for face-to-face outreach and accessible, clear communication methods.
- **Local authorities:** Ensure aid-related information is transparent and accessible through village councils, administrative offices, and printed materials. Strengthen coordination with humanitarian actors to verify lists and reduce misinformation.



*A key takeaway from our discussions is that verified, trusted communication channels matter. Many recipients struggle to assess whether an information source is legitimate, leading to fear of scams, misinformation, or confusion about eligibility. As one resident explained, 'If working online, it should be through verified media channels, using already existing, trusted platforms.'*

**Aid recipient group discussion participant in Kyiv oblast**



*My recommendation is to work in person through local authorities. There are too many scammers – people click on a link, and that's it, they get hacked. Even our fellow villagers write in the chat, saying they clicked on a link and got scammed.*

**Aid recipient group discussion participant in Kyiv oblast**

### 8.3.3 Beyond rigid categories: Adopting flexible eligibility in localised cash assistance

**Why this matters:** Rigid eligibility criteria can exclude vulnerable people who do not fit standardised categories, limiting the effectiveness of cash assistance programmes. A more flexible approach allows local actors to address context-specific needs, ensuring that assistance reaches those who may otherwise be excluded. During our workshop held in Kyiv to present study findings, humanitarian actors proposed an **85/15 flexibility model**: a recommendation aimed at introducing greater discretion in eligibility decisions.

Under this model, 85% of aid distribution would continue to follow standardised eligibility requirements, while 15% would be left to the discretion of local CSOs, allowing them to support individual cases that would be otherwise unattended.

**One stakeholder, one action:**

- **Donors:** Require international NGOs and UN agencies to incorporate locally informed eligibility criteria into programme design.
- **International (operational) partner:** Implement flexible eligibility models, such as the 85/15 approach, in which local CSOs have discretion over 15% of eligibility decisions to address individual cases and underserved groups. Ensure that flexibility is explicitly embedded in funding agreements and implementation frameworks to support adaptive programming. Conduct regular field visits to assess evolving needs and refine eligibility criteria accordingly.
- **Cash Working Group:** Advocate for localised eligibility adjustments to ensure that decision-making processes reflect community realities. Collect and present evidence, case studies, and impact assessments to support the implementation of more flexible eligibility models.

**||** *It's important to consider the large number of people who don't fit into any eligibility criteria. They have many unmet needs – whether due to a lack of jobs or because their children still need support, even if they are 18 years old. This is something to keep in mind when planning aid programmes: that there is a whole group of people who are alone and have no one to take care of them.*

**Aid recipient group discussion participant in Zaporizhzhia oblast**

**||** *It's frustrating when they tell you that you don't qualify because of one small detail, even though your situation is just as bad as someone who does qualify. We don't need perfect categories – we need real help.*

**Aid recipient group discussion participant in Kyiv oblast**

## 9. ANNEXES

### 9.1 Methodology and advisory group

*Research design*

Based on the preliminary findings on obstacles (built upon data from “Mapping the user journeys of cash recipients in Ukraine”, a collaborative project of Ground Truth Solutions (GTS), Open Space Works Ukraine (OSWU) and the Collaborative Cash Delivery Network (CCD)) and the terms of reference for the

“study on the role of Ukrainian civil society in humanitarian cash assistance”, the following research questions were designed to guide the study:

**Overarching research questions:**

- » What is the current and potential future role of Ukrainian civil society in the provision, coordination, and leadership of humanitarian cash assistance in Ukraine?
- » What are the key structural, operational, and financial challenges faced by Ukrainian civil society organisations (CSOs) in providing, coordinating and delivering cash assistance, and how can these be addressed to improve their effectiveness and leadership in the humanitarian response?
- » How can humanitarian cash assistance programmes in Ukraine be localised and/or locally-led, ensuring greater alignment between Ukrainian civil society, international actors, and social protection (government) systems for sustainable and inclusive support?
- » What are the strengths of Ukrainian CSOs in the humanitarian response, and how can they build on those to play a leading role in areas where they offer unique expertise and local knowledge?

**Clustered guiding questions:**

- » Role and capacity of civil society (under overarching question 1 and question 4)
  - What is the current role of Ukrainian CSOs in designing and delivering cash assistance at different levels of scale?
  - What is the current role of Ukrainian CSOs in designing and delivering cash assistance at different levels of scale?
  - What are the strengths and weaknesses of Ukrainian CSOs compared to international organisations in (1) reaching people in Ukraine that need humanitarian assistance; (2) engaging and supporting marginalised groups; (3) supporting design and delivery of government led social protection systems and supporting alignment between humanitarian cash and social protection systems; (4) delivering more cost-effectively than international organisations? What evidence is there on this?
  - How can Ukrainian CSOs scale up their involvement in humanitarian/nexus cash assistance programmes to lead the full programme cycle from design to implementation, monitoring and learning?
  - How can Ukrainian CSOs engage with the government social protection system? Where and how can they complement and enhance government-led systems and support the transition to the shock-responsive social protection framework, and other ongoing development initiatives?
  - What specific contributions can Ukrainian CSOs make to bring the voices of local communities into the humanitarian and social protection system?
- » Barriers and challenges (under overarching question 2)
  - What structural and procedural barriers, such as taxation, donor priorities and policies, humanitarian structures and hierarchies, limit the capacity of Ukrainian CSOs in cash assistance delivery and how they impact their ability to participate in humanitarian cash programmes or

- complement the social protection response or support transition to governmental shock responses?
- What challenges arise due to the structural and procedural barriers, particularly for marginalised populations?
  - What good practice examples are there of overcoming these challenges and barriers?
  - How can Ukrainian CSOs advocate for policy and legislative changes to address systemic barriers and enhance their ability to deliver effective cash assistance and improve inclusion in government systems? What support do they need from international actors and the government in this advocacy?
  - What role (if so) do Ukrainian CSOs see for INGOs or the UN in the future that they cannot fulfil themselves?
  - What are the challenges and barriers for local authorities to work with CSOs in cash delivery?
  - What are the main challenges for CSOs to have a humanitarian principled approach to cash leadership and delivery?
- » Impact on vulnerable populations (under overarching question 2)
- How can Ukrainian CSOs better ensure principled, inclusive and equitable cash assistance programs/interventions, particularly for women and marginalised groups (e.g. older people, people with disabilities, rural, LGBTQ+, Roma communities)? What evidence is there? In compliance with the leave no one behind approaches.
  - How do local CSOs manage accountability to affected populations, address grievances, collect feedback and go back to communities, and ensure transparency in cash delivery? How can they input their knowledge on how accountability works into the wider humanitarian response and into the government systems (local and central)?
  - How can Ukrainian CSOs improve the timeliness and efficiency of cash assistance delivery during crises? How do they track their speed and cost? What evidence is there?
- » Coordination and leadership (Under Overarching Question 1 and 3)
- How are Ukrainian CSOs integrated into national and local-level coordination mechanisms for cash assistance?
  - What are the enablers and barriers to improving coordination between Ukrainian CSOs, international organisations, and national and local governments?
  - How can Ukrainian CSOs strengthen collaboration with government departments to ensure complementarity between cash programmes and social protection systems?
  - How is area-based coordination functioning in Ukraine at different levels (national and local) and what is the relevance of Ukrainian CSOs in specific areas?
  - How can Ukrainian CSOs collaborate with INGOs, UN, and local governments to leverage referral mechanisms and expertise to better serve vulnerable populations?
  - Localised and/or locally-led humanitarian cash assistance and sustainability (under overarching question 3)

- What opportunities exist to shift toward a more localised and/or locally-led humanitarian cash assistance model in Ukraine?
- What strategies can enhance the role and sustainability of Ukrainian CSOs' involvement in supporting and complementing government led social protection as international actors scale down?
- What evidence and advocacy strategies can Ukrainian CSOs use to influence government legislation and policies to support a localised shock response that supports the most vulnerable and marginalised? What support do they need from donors, UN, INGOs, if at all?

### *Data collection*

We conducted 33 key informant interviews between November 2024 and February 2025. The primary goal of these interviews was to gather in-depth insights from diverse actors involved in humanitarian cash assistance in Ukraine. Interviews included five national NGOs; ten regional and local NGOs; four (sub-) national authorities; five international NGOs; five consortium/coordination entities; five donors. Three separate guides have been created for the different participant groups. Each guide focused on specific areas relevant to the participant's role and expertise:

1. International actors (donors, INGOs and representatives of coordination structures): Key areas of focus included collaboration with local actors, mutual learning opportunities, and identifying barriers and enablers to increase local actor involvement in cash delivery.
2. National, regional, local NGOs, participants in the focus group discussions, and the CCD local Community of Practice in Ukraine: Tailored to Ukrainian civil society organisations, this guide explored the roles these organisations play in cash assistance, their unique strengths, and challenges they face. Topics included collaboration with government and international bodies, inclusion of marginalised populations, and potential avenues for increased local leadership in cash assistance.
3. Local governmental agencies / social protection entities: This guide focused on the interaction between government bodies and civil society in delivering cash assistance. Questions centred around coordination mechanisms, integration of cash assistance within social protection frameworks, and the sustainability of government-CSO partnerships for cash delivery.

We also organised eight focus group discussions across different regions of Ukraine, including both urban and rural areas, with local community members cash recipients and non-recipients, internally displaced people. Discussions were focusing on exploring the experience and impact of cash assistance, assess accessibility barriers, and identify gaps in current aid programmes, as well as suggestions for more inclusive, transparent, and responsive cash assistance frameworks. Non-recipients were invited to reflect on why they may not have accessed cash assistance.

### *Advisory group*

We convened the advisory group as a pivotal consultative body within the study. The advisory group was designed to ensure that the research remained grounded, contextually relevant, and participatory, bridging

insights across civil society, donor entities, and governmental bodies to enrich the study's depth and applicability. The advisory group comprised diverse participants, including representatives from Ukrainian civil society organisations active in cash assistance, international organisations, members from the Cash Working Group in Ukraine and donors representatives. This diversity in background was intended to provide a broad spectrum of perspectives, ensuring that the research approach captured both grassroots realities and strategic insights. Through their collective expertise, the group was tasked with guiding the study's direction, offering feedback on methodology, and supporting stakeholder engagement.

*Analysis and recommendations*

All interviews were recorded, transcribed, and analysed using MAXQDA coding software. Preliminary results were validated through a workshop in Kyiv and online with the advisory group and a broader group of stakeholders on 14 February 2025.

As part of this study, preliminary recommendations were formulated alongside key findings on the strengths, challenges, and opportunities for Ukrainian CSOs in leading cash programmes. During interviews, participants were asked about potential measures to improve locally-led cash assistance delivery and how Ukrainian CSOs could take on a greater leadership role. They were also invited to suggest specific actions that could support this transition. The first round of discussions on the recommendations, alongside the preliminary findings, took place during the advisory group meeting on 4 February 2025. Advisory group members reviewed the initial draft and provided feedback, helping to refine the recommendations further. Following the initial analysis phase and advisory group discussion, around ten core recommendations were identified, covering themes such as increasing the visibility of local actors, adapting rigid eligibility criteria, enhancing coordination mechanisms, strengthening engagement with local communities, and enabling national organisations to lead consortiums. However, while these recommendations were well-grounded in participant data, they often lacked specific, actionable steps. To address this, workshop participants critically examined the existing good practices and explored how to scale them up. They also reviewed the preliminary recommendations, providing comments and suggesting concrete actions to bring them to life. New recommendations also emerged from the discussions. The updated recommendations were then taken into a second round of discussions during the CCD Local Community of Practice localisation workshop on 20 February 2025 in Kyiv and online. Local Ukrainian CSOs engaged in cash assistance programming reviewed the list, suggested additional actions, and refined the wording of several recommendations to ensure clarity and relevance.

**9.2 List of KIs and FGDs**

*Key Informants Interviews*

#	Type of organisation	Location	Target group	Type of aid provided
1	National NGO	Kyiv	Women	N/A
2	National NGO	Kyiv	Families with children	Cash for protection
3	National NGO	Kyiv	N/A	Cash for Shelter

4	National NGO	Kyiv	N/A	MPCA
5	National NGO	Kyiv	N/A	Livelihood support
6	Regional NGO	South / East	Women	N/A
7	Regional NGO	South / West	Roma	Cash for protection
8	Regional NGO	South / East / North	Families with children	Cash for protection
9	Regional NGO	South	IDPs	N/A
10	Regional NGO	South / East	Ex-combatants	MPCA
11	Regional NGO	South / East	N/A	Non-providers
12	National Authorities / Social Protection	National	N/A	N/A
13	Local Authorities / Social Protection	South	N/A	N/A
14	Local Authorities / Social Protection	East	N/A	N/A
15	Local Authorities / Social Protection	North	N/A	N/A
16	Local NGO	Rural community in North	N/A	Small or medium rebuilding
17	Local NGO	Rural community in Centre	IDPs	N/A
18	Local NGO	Small community in West	IDPs	Group cash
19	INGO	N/A	N/A	Cash for protection
20	INGO	N/A	N/A	MPCA
21	INGO	N/A	N/A	Cash for shelter
22	INGO	N/A	N/A	Group Cash
23	INGO	N/A	N/A	Livelihood
24	Perekhid Initiative	National	N/A	Social Protection
25	East Hub Coordinator	East	N/A	N/A
26	Cash working group	National	N/A	N/A
27	Cash working group	National	N/A	N/A
28	CCD	International	N/A	N/A

29	Donor	National	N/A	N/A
30	Donor	International	N/A	N/A
31	Donor	International	N/A	N/A
32	Donor	International	N/A	N/A
33	Donor	International	N/A	N/A

#### Focus Group Discussions

#	Type of participants	Type of location	Type of community	Target group	Location
1	Recipients	South of Ukraine	Rural	Local community members	Mykolaiv oblast, Voznesensk community
2	Recipients	South of Ukraine	Rural	Local community members	Zaporizhzhia city
3	Recipients	North	Rural	Local vulnerable community members (single mothers, unemployed)	Sumy oblast, Chernechchenska hromada
4	Recipients	East of Ukraine	Urban	Local community members	Kamianske, Dnipropetrovsk oblast
5	Recipients	South of Ukraine	Urban	IDPs	Odesa city
6	Recipients	Centre / West of Ukraine	Rural	IDPs	Kyiv oblast, Baryshivska hromada
7	Non-recipients	East of Ukraine	Urban	IDPs, who are not eligible for governmental payments	Kamianske, Dnipropetrovsk oblast
8	Non-recipients	National	N/A	CoP members	

## 9.3 Advisory board Terms of Reference

Terms of reference for the advisory group in the study on the role of Ukrainian civil society in the provision of humanitarian cash assistance

*Introduction and purpose*

Humanitarian cash assistance in Ukraine has predominantly been delivered by international actors, with limited involvement of Ukrainian civil society organisations (CSOs) in leadership roles. Despite their deep understanding of local contexts, Ukrainian actors have been largely relegated to support roles. Given the significant expertise and localised knowledge of these CSOs, this study seeks to assess how their participation can be enhanced, particularly as international humanitarian actors plan to scale back their operations. The objective is to identify pathways for transitioning cash assistance programmes to a more locally-led model. The study will be conducted by a consortium that includes Open Space Works Ukraine (Kyiv, Ukraine) and Ground Truth Solutions (Vienna, Austria). Open Space Works Ukraine will take the lead on facilitating the work of the advisory group.

***The advisory group plays a crucial consultative role in this study by ensuring that the research remains contextually relevant, participatory, and reflective of the diverse stakeholders engaged in cash assistance provision. The group will provide feedback and recommendations on key aspects of the research while fostering collaboration among various civil society actors, donors, and authorities.***

*Objective*

The advisory group will provide consultative guidance and feedback to support the study's implementation. This includes advising on the prioritisation of outputs and helping ensure stakeholder engagement from civil society actors, donors, and government entities, as well as holding the research project accountable by questioning methods, providing feedback on activities and processes.

*Roles and responsibilities*

Guidance and consultation:

- Participate in discussions on study outputs to ensure alignment with the overarching goals, offering feedback on phasing and prioritisation.
- Offer consultative input on the research methodology, data collection strategies, and analysis to enhance the study's design and ensure its feasibility.

Stakeholder engagement:

- Facilitate access to key stakeholders, including Ukrainian civil society actors and international organisations involved in cash assistance, to enable data collection and strengthen collaboration.
- Support the inclusion of marginalised voices by recommending actors for interviews and focus groups, ensuring that underrepresented communities are adequately represented in the research.

Review and feedback:

- Review drafts of findings and reports, providing constructive feedback to the research team to ensure that the conclusions reflect on-the-ground realities and the diverse experiences of stakeholders.
- Participate in validation workshops to ensure that findings align with the expectations and insights of key stakeholders.

Dissemination:

- Support in the planning of dissemination activities by offering advice on how best to communicate findings to operational actors, donors, and Ukrainian civil society.
- Participate in dissemination events to engage with stakeholders and discuss findings and recommendations.

#### *Expected contributions*

The advisory group's consultative role will contribute to the study's success by:

- Ensuring an inclusive and comprehensive mapping of Ukrainian civil society's role in cash assistance.
- Identifying barriers and enablers to locally-led humanitarian cash assistance.
- Offering recommendations for transitioning to a locally-led model of cash assistance delivery.

#### *Format of engagement*

Participation in the advisory group is voluntary. Members are expected to contribute their expertise and insights, without monetary compensation or remuneration.

Upon the completion of the research in March 2025, the advisory group will be disbanded, and there will be no ongoing responsibilities following the publication of the findings.

#### *Membership*

The advisory group will consist of, but not limited to representatives from:

- Ukrainian civil society organisations representatives involved in cash assistance.
- Members of the Cash Working Group (CWG) in Ukraine.
- International partners and donors involved in cash programming.
- National and local government authorities relevant to cash assistance coordination.

#### *Tentative Timeline*

The advisory group will be engaged throughout the study's key phases, as outlined below:

- Inception Phase - 1 meeting (October - November 2024)

**Format of engagement:** 2-hours online meeting in Ukrainian (with potential English translation) on the week from October 28, 2024 to November 1, 2024 to discuss the research questions and sample.

**Activity:** Consult on the development of the study's methodology and review the inception report.

**Expected output:** Inception report with advisory group feedback incorporated.

- Implementation Phase - 1 meeting (December 2024 - February 2025)

**Format of engagement:** one interim online 2-hours online meeting in Ukrainian (with potential English translation) on the week from January 13, 2025 to January 17, 2024 to discuss the data collection progress and individual consultations to the data collection team regarding engagement of potential participants.

**Activity:** Provide ongoing feedback during data collection, including key informant interviews and focus group discussions.

**Expected output:** Interim reports with analysis of findings shared with the advisory group for review and comment.

- Validation Workshop (February 2025)

**Activity:** Participate in an in-person (or hybrid) validation workshop to review preliminary findings and provide final feedback.

**Expected output:** Workshop report documenting stakeholder feedback and recommendations.

**Format of engagement:** one day in-person validation workshop (with potential English translation) to discuss the preliminary findings and provide input on recommendations on the week from February 10, 2024 to February 14, 2024.

- Dissemination Phase (March 2025)

**Activity:** Support dissemination efforts, including presentations to key stakeholders and facilitating discussions on the study's findings.

**Expected output:** Dissemination of final reports and presentations with input from the advisory group.