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The meeting of humanitarian and civic space in Sudan

Lessons for localisation

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Disclaimer

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Cover photo: A Sudanese women tends a herd of goats, 2014. © anmede/Flickr

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The meeting of humanitarian and civic space in Sudan: lessons for localisation

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Acronyms

CBO	community-based organisation
CPA	Comprehensive Peace Agreement
CSF	Conflict Sensitivity Facility
CSO	civil society organisation
DDRA	Darfur Development and Reconstruction Agency
ERR	Emergency Response Rooms
HAC	Humanitarian Aid Commission
ICC	International Criminal Court
IDP	internally displaced person
INGO	international NGO
KI	key informant
KII	key informant interview
NGO	non-governmental organisation
NMPACT	Nuba Mountains Programme Advancing Conflict Transformation
NPA	Norwegian People's Aid
OECD	Organisation for Economic Co-operation and Development
OLS	Operational Lifeline Sudan
RSF	Rapid Support Forces
SAF	Sudanese Armed Forces
TEPS	'Towards Enduring Peace in Sudan'
UNDP	United Nations Development Programme

Chapter 1 Introduction

Shrinking 'space' for humanitarian action has long been a concern within the humanitarian community (ALNAP, 2022). In parallel, the space for civil society is also under threat: monitoring of civic rights shows a year-on-year decrease of space to exercise fundamental freedoms (CIVICUS, 2023), and faith networks have long been reporting that 'the work of civil society organisations (CSOs) is becoming increasingly dangerous' (Howard et al., 2014: 7). But how do these trends relate to each other? This paper explores the interconnectedness of humanitarian and broader civic space in Sudan, where possible from the perspective of national humanitarian actors, and identifies the implications for localising the delivery of humanitarian action.

Sudan is one of the most impoverished nations in the world, with a long and turbulent history of civil war. This includes a long period of protracted conflict in Darfur from 2003 and the break-up of the country and secession of South Sudan in 2011. War continues today, with nationwide conflict between the Rapid Support Forces (RSF) and Sudanese Armed Forces (SAF) since April 2023, triggering a massive humanitarian crisis. Sudan also has a diverse and vibrant civil society, parts of which spearheaded the popular revolution in 2019 that overthrew 30 years of authoritarian rule, although it was subsequently reversed by a military coup in October 2021. This paper aims to contribute to current thinking on humanitarian action in Sudan, by providing a historical perspective on civil society in Sudan and the interaction of civic and humanitarian space, and thus to inform strategic decision-making, policy and practice on localisation in the current context.

Although 'localisation' as a term and as a commitment associated with particular goals or actions dates back to the World Humanitarian Summit in 2016,[1] as a way of working it has a longer history in Sudan, as described in Chapter 6. In the last year, the role and significance of locally led humanitarian action in Sudan has been widely recognised, both for its frontline response and also because it has often been the only form of humanitarian assistance available to affected communities. The fact that the international humanitarian aid community has struggled to adequately and appropriately support this locally led response is also widely recognised (see Chapter 6).[2]

1.1 Methods and constraints

The research team for this work comprised the author and an experienced civil society leader in Sudan. They conducted both a review of relevant literature, and 26 interviews with key informants (KIs) drawn from the national and international development, humanitarian, and peacebuilding communities.

Based on this information the research team has carried out a light mapping of the range of civil society actors engaged in humanitarian action in Sudan, taking a historical perspective (see Chapter 2).

1 See https://gblocalisation.ifrc.org/.
2 See, for example, the workshop held at the US Institute of Peace, Washington, DC in January 2024 (www.youtube.com/watch?v=57K41mKnhto).

The extremely challenging operational context in Sudan since April 2023, with high levels of violence, massive unmet humanitarian needs descending into famine conditions, and telecommunication blackouts have severely hampered the research team's access to national humanitarian actors currently working within Sudan. Most of the work has been carried out remotely, reaching out to civil society leaders within Sudan where possible, and relying upon key informant interviews (KIIs) with a number of 'intermediaries'. This includes civil society activists and Sudanese academics who have left the country during the last year, members of the Sudanese diaspora, and international researchers with long and in-depth knowledge of civil society in Sudan, and of humanitarian action.

While the topic of the convergence of humanitarian and civic space is gaining increasing interest in the global humanitarian community, the research team found that it is not part of the discourse at national nor regional levels. This was therefore the first opportunity for many interviewees to engage with the subject, although there is a lively and active current debate on localisation in Sudan. The team therefore adjusted interview questions to allow for this and to promote free-flowing and informative discussions.

Chapter 2 Overview of civil society in Sudan

Sudan has a long history and tradition of social capital networks that have, in many ways, been the backbone of civil society, and are deeply rooted in Sudanese cultural norms. Also called 'informal social safety nets' (Birch et al., 2024), these have been oriented to providing assistance or welfare to those in need, as a way of channelling resources from better-off to less well-off members of the community, and as a way of funding public infrastructure, particularly at times and in places where there has been limited government provision of services and infrastructure. While some of this has been done through informal networks, associations have also been formed, for example during periods of urbanisation to facilitate the flow of remittances from urbanised members of the community to rural relatives remaining in their place of origin and, on occasion, to facilitate the provision of locally harvested grain from rural communities to their urban relatives.

Similarly, associations have been formed to facilitate the flow of remittances from the diaspora who migrated abroad to their communities of origin, for example to fund public and social infrastructure such as the building of schools and mosques. These networks are often organised around ethnic and kinship groups, and may be called upon for assistance during periods of crisis.[3] In the last year, these social capital networks have played a critical role in providing assistance to those affected by conflict, for example through communal kitchens and food-sharing, and by channelling resources from the diaspora to communities in need. As described by Birch et al. (2024: 6), the

> grass-roots structures that facilitate [these informal social safety nets] have shown significant capacity to assist those affected by conflict, helped by the trust they enjoy at local level, their flexibility, and their intimate understanding of conflict dynamics.

Faith-based and religious institutions also have a long and deep history in civil society activity in Sudan, and as a source of charitable humanitarian assistance. This includes the mosque and al-maseed – the Qur'anic school – which host guests to a village, including the displaced, providing food and lodging. The physical place where guests and those in need are accommodated is also known as khalwa. These are present in almost all parts of Sudan. Some khalwa, but not all, are provided by and associated with the al-maseed. During the last year, these religious institutions have provided vital support, especially to the newly displaced when they first arrive in a village or town, from Darfur and Kordofan, to Gezira and Sennar (see Figure 1).

3 They are often called 'Abna', meaning 'sons/ children of', referring to their place of origin. However, there are exceptions to such kinship affiliation: in 1999, for example, the people of El Fasher provided assistance to the people of Dongola following the floods, beyond ethnic or kinship affiliations.

Figure 1 Map of Sudan, its states and their main cities

Source: UN

The institution of zakat is an integral pillar of Islam – a form of almsgiving whereby Muslims donate a certain percentage of their savings and income. Traditionally this was a part of civil society in Sudan, but as explained below (see Section 3.2), has become co-opted by government.

There is a long tradition of civil society organising around collective action, usually where a large workforce is required in public service, for example to construct fire lines,[4] dig a local reservoir, or support families in

4 A fire line is a gap that is created in vegetation, which acts as a barrier to the spread of fire, thus protecting pasture, forest, crops and settlements.

need, including in house construction where their property has been destroyed by fire or cultivation where they are lacking labour. Nafir, a form of organised communal labour, is the most common and best-known form of collective action in Sudan and plays a key role during crises (Hayati, n.d.).

Then there are the informal and non-hierarchical CSOs, mostly associated with youth groups engaged in political activism during the al-Ingaz regime (from 1989 to 2019), protesting against economic hardship and ultimately the regime itself. Girifna was one of the earlier movements, founded by a group of university students in 2009, who were subsequently at the heart of political protest against the regime in 2012.[5] More recently, political activism by students and other Sudanese youth has taken the form of resistance committees, at the centre of the popular revolution of 2019.[6] These represent the latest generation of civil society development, capitalising on modern information and communication technology, with fluid and decentralised forms of organisation and distributed leadership. The informality and non-hierarchical nature of these organisations has helped them, to some extent, evade being targeted and closed down by security. But it does not mean they are lacking in transparency and downward accountability.[7] Resistance committees have been key in setting up Emergency Response Rooms (ERRs), described as 'a variety of local actors and institutions, such as resistance committees, youth and women's associations, faith groups, businesses, professional network, and other civil society organisations [who] come together to provide services to a population' (Birch et al., 2024: 28).

Assistance (including humanitarian assistance) provided by the above informal and usually unregistered networks is often referred to as 'mutual aid': 'the voluntary reciprocal exchange of resources and services for mutual benefit. It is an act of solidarity, not charity, and is driven by community members with limited bureaucracy' (D'Arcy, 2023). In Darfur, such acts of social solidarity and mutual assistance have been a feature of the camps for internally displaced persons (IDPs) in the last two decades of the conflict, sometimes with a gendered dimension.[8] In the last year, mutual aid provided by these networks has been a critical lifeline for many communities and people that have experienced the brunt of the widespread humanitarian crisis and who are beyond the reach of external actors (Shabaka, 2024a; Birch et al., 2024). Indeed, mutual aid networks are described as providing more than humanitarian assistance: 'These efforts are building trust, legitimacy and seeking to prevent further damage to the torn social fabric' (D'Arcy, 2023). However, the extent and depth of the humanitarian crisis in the last year has overwhelmed mutual aid efforts in parts of the country, especially where their funding, often from the Sudanese diaspora, has not been able to match rising levels of need (Birch et al., 2024).

Finally, there is what is sometimes referred to as 'modern' civil society in Sudan, meaning more formalised organisations, often with clear and sometimes hierarchical structures. These organisations date back to the 1900s, with their political roots in resistance to British colonial rule, for example the

5 See www.opendemocracy.net/en/5050/we-are-fed-up-power-of-new-generation-of-sudanese-youth-activists/.

6 The Carter Center mapped youth groups in Sudan in 2021, and identified 5,289 resistance committees across all states in Sudan (The Carter Center, 2021 in Birch et al., 2024).

7 See, for example, www.cmi.no/publications/8866-mutual-aid-rethinking-international-humanitarian-engagement-in-sudan.

8 See Mohamed (2023), for examples of how women organised themselves to provide mutual support to other women in Abu Shouk camp.

White Flag League in the 1920s, the university students' Graduates General Congress in the 1930s, and trade unions in the 1940s and 1950s (Assal, 2016). Some of these CSOs, especially professional and student unions, were instrumental in overthrowing the Aboud dictatorship in 1964 and the Nimeiri dictatorship in 1985 (ibid.)

Also part of modern civil society are the non-governmental organisations (NGOs) and community-based organisations (CBOs) associated with rights-based advocacy, development work, humanitarian action and peacebuilding, most of which have long been required to be registered with government, either at federal or state levels. These are usually multi-mandate, pivoting in their focus according to the main needs of the population at any time, and also influenced by the availability of international funding (see Chapter 5).

This brief overview of the diverse range of civil society actors in Sudan comes with two cautionary comments.[9] First, Sudan civil society requires a broad conceptualisation of what it is, to ensure the inclusion of diverse groups, as described above, ranging from traditional leaders, faith-based organisations, ethnically based associations, student movements and national NGOs. Second, Sudan civil society is fluid and defies a neat or rigid categorisation: for example, the members of any one organisation may wear a number of different hats, illustrated in the last year in the pivoting of members of the resistance committees to set up ERRs in response to extreme violence, particularly in urban areas including the capital. Those close to the resistance committees also warn against putting them all in one 'box', because of a need to recognise the diversity between resistance committees, not least as they adapt to the different political and humanitarian contexts in different parts of the country.

9 As noted by a number of KIs for this research, and by Assal (2016).

Chapter 3 Sudan's civic space since the 1980s

The Organisation for Economic Co-operation and Development (OECD) defines civic space as:

> the physical, virtual, legal, regulatory, and policy space where people can, among other things, securely exercise their rights to the freedoms of peaceful assembly, association, and expression, in keeping with human rights (OECD, 2023).

This chapter provides a broad chronological narrative of how civic space in Sudan has expanded and contracted over time.

3.1 Contraction and expansion of civic space – 1980s to present day

The first CSO act in Sudan, passed in 1957, was regarded as highly democratic and expansive for civic space, although administrative decisions by government, particularly under the Nimeiri regime between 1969 and 1985, could be very restrictive despite the act (PDS, 2009). Sudan's brief era of democracy in the second half of the 1980s was a period of expansion. The drought and famine of the mid-1980s is described as a 'landmark in the emergence and growth of CSOs' in Darfur (ibid.: 3), in response to widespread humanitarian need and the availability of international funding. The sense of voluntarism across Sudanese civil society is credited with confronting the famine (Assal, 2016). The rapid expansion of urban areas from the 1970s onwards, accelerated by drought and conflict-related displacement, also provided the necessary conditions for the growth and multiplication of urban-based ethnic associations in the national capital and regional towns (see Chapter 2).

The military coup in 1989 that ushered in the al-Ingaz (meaning 'Salvation') regime and 30 years of authoritarian rule under President Omer al-Bashir marked another turning point. The Islamist regime was deeply suspicious of CSOs, often associating them with opposition political parties, and especially the Communist Party. Trade unions and many associations were banned (Assal, 2016). All national NGOs were dissolved and had to re-register under tighter controls imposed under a new law in 1991 (PDS, 2009). The 2006 legislation – Organisation of Voluntary and Humanitarian Work Act – which covered both national and international NGOs was generally regarded as controlling. It gave the Humanitarian Aid Commission (HAC) substantial powers to control registration, funding channels to CSOs, and where international and national humanitarians could conduct their activities (ibid.). It became increasingly difficult for national NGOs to engage in advocacy.[10] As HAC was transformed into a security body, its role was to control rather than facilitate the work of civil society actors (Assal, 2016).

Yet despite these regulatory restrictions, there were also factors triggering the growth of CSOs. For example, the new regime had made redundant many government officers who were not politically

10 KIs describe difficulties in getting permits to run workshops, or to carry out research.

aligned to the Islamist movement, many of whom then formed and became part of CSOs.[11] At the same time, government services were contracting in the periphery of the country, for example in the greater Darfur region, as government prioritised militarisation of the regime. Civil society networks stepped in to fill some of the gaps, such as the provision of health services and education, often funded by the diaspora, particularly those working in Middle Eastern countries.[12]

Meanwhile, from the 1990s the al-Ingaz regime was reviving and reconfiguring Sudan's Native Administration,[13] with the aim of increasing its popularity and support for policies at the grassroots level through the traditional leadership (Abdul-Jalil, 2014). This was widely seen as politicisation of the Native Administration, directly contributing to its loss of credibility. This was exacerbated in the case of Darfur where tribal shura councils were established amongst the majority of Darfur tribes, operating like 'elite clubs or secret societies', often liaising closely with security forces and/or militias during the conflict (ibid: 8). The educated elite from marginalised areas such as Darfur were encouraged to organise along ethnic lines as the best option in a totalitarian regime 'to defend themselves and preserve their interests [...] [by] show[ing] allegiance to the regime under an ethnic banner' (ibid: 11).

Nevertheless, some members of Sudanese civil society and other analysts describe an expansion of civic space with the peace process that resulted in the Comprehensive Peace Agreement (CPA) signed in 2005, the drafting of a new constitution for Sudan and a progressive Bill of Rights. This was a period of greater political openness and freedom in the run-up to the secession of South Sudan, when the government of Sudan was under greater international (and in particular western) scrutiny with a heightened visibility of civil society actors, particularly those involved in the peace process. And there was a surge in international funding and support for political transition (see Chapter 6).

During the same period, at the height of the Darfur conflict in March 2009, the government took punitive action to revoke the registration of four national NGOs and expel 13 international NGOs in response to the indictment of President al-Bashir by the International Criminal Court (ICC) for war crimes against humanity in Darfur. Those de-registered or expelled were accused of collecting information and briefing the ICC against the regime (Pantuliano et al, 2009). This indicates the different experience of expanding and contracting civic space in different parts of the country and for different activities at the same time. The ICC indictment also triggered a government announcement of the 'Sudanisation' of humanitarian assistance whereby at least part of the humanitarian response was to be channelled through national partners, including government institutions, national NGOs and CBOs (PDS, 2009). In practice, this often meant pro-regime organisations (CSF, 2023).

After the 2011 referendum that confirmed the secession of South Sudan, civil society activists describe a 'new level' of contraction of civic space, particularly around the time of the Arab Spring. Student-led

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11 As noted by Assal (2016), referencing his earlier work: 'Disillusioned by weak political parties, educated activists turn to civil society to promote and build peace in Sudan' (Assal, 2016: 9)

12 As reported by KIs with long knowledge and engagement with civil society in Sudan.

13 'Native Administration' refers to a form of local governance in Sudan based on tribes or ethnic groups, promoted by the British colonial authorities (Abdul-Jalil, 2015).

protests in Sudan in 2012 in response to price increases, austerity measures and political grievances were violently dispersed by security forces and there was a media crackdown (Human Rights Watch, 2013). This was exacerbated in 2013 when there was widespread flooding in Sudan. Despite the restrictions on civic space, civil society launched its own humanitarian response, particularly through Nafir, just as government was struggling to launch an effective response. The regime felt threatened and closed down many of the Nafir.

In many ways, 2012–2013 marked the early days of the youth-initiated resistance committees, which were to play such a critical role in the popular revolution and overthrow of the al-Ingaz regime. Despite the regime's attempts to suppress the resistance committees through violence and other forms of crackdown, they have proven remarkably resilient, after the military coup of 2021 and since the outbreak of war between the RSF and SAF in April 2023. Firmly rooted in local communities, they have pivoted and adapted according to the communities' needs (see Chapter 5). However, their political roots have triggered a backlash in the last year, particularly from the government of Sudan. At the time of writing, resistance committees and their ERRs are banned by the local authorities in almost all parts of Sudan controlled by SAF, although in practice they continue to operate.

3.2 Factors contributing to the contraction of Sudan's civic space – and to its resilience

Despite the many legal and regulatory constraints on civic space in Sudan over the last 30 years, it is striking how civil society has flourished and how resilient it has been. The imperative for society to respond to the economic, humanitarian and political challenges of the time appears to have outweighed the regulatory constraints. In the words of one seasoned civil society leader in Sudan:

> The 2011 to 2019 period witnessed the most significant expansion. Limited government services and reduced freedom of expression led to a surge in voluntary and charity organisations, reaching 17,000 nationally by 2016.[14] This youth-driven growth built capacity and awareness for the 2019 revolution.

And during the first six years of the Darfur conflict, between 2003 and 2009, 65% of registered CSOs in Darfur had emerged directly as a result of the conflict (PDS, 2009).

If a common pattern can be detected, it is this: there has been an expansion in the number of civil society actors in response to a particular need emerging and being acted upon, for example humanitarian need during the drought of the mid-1980s, displacement and humanitarian needs during the Darfur conflict, and/or related to a drive for political change and transition. In the case of a humanitarian crisis, and in the case of some periods of political transition (for example, during implementation of the CPA) such an expansion of civil society may be boosted by the availability of international funding. Where this was seen as threatening to the authorities, according to KIs, it triggered a backlash in terms of increased regulation

14 Note that it is not possible to verify this number. The number of organisations registered by HAC is believed to be in the region of 10,000 at its peak.

and targeting of civil society actors by the security apparatus. This was particularly acute in the case of the ICC indictment of the president and other members of government. It has also been triggered by flows of international aid funding to which the government did not have access, for example when the government of Sudan withdrew from the Cotonou Agreement in 2009 and became ineligible for funds from the European Development Fund.

Rights-oriented civil society actors and political activists have usually been subject to the greatest level of harassment and restrictions by the authorities, and those engaged in service delivery slightly less so. But the geographic and ethnic roots of different civil society actors have been a major factor in how they have been viewed and allowed to operate by the authorities. For example, in contested areas like South Kordofan after the signing of the CPA when international funding was plentiful, CSOs were permitted to build basic infrastructure, but were banned from engaging in community organisation or conducting surveys. Any forms of data collection were regarded with a high level of distrust by the authorities and suspected as spying.

Politicisation of civil society by the al-Ingaz regime became a dominant feature as it instrumentalised CSOs for its own purpose and agenda, thus blurring the lines between political parties and civil society. This was achieved by the government creating its own NGOs and interfering directly in selecting the leadership of independent CSOs (Assal, 2016). Politicisation of zakat is another example, whereby the Zakat Chamber was incorporated within government, becoming one of the richest government institutions yet with limited or no accountability. As the Darfur CSO study commented in 2009: 'a conspicuous feature of present Sudanese CSOs is the blurred dividing lines between governmental and non-governmental organisations as processes of political manipulation are quite visible and apparent' (PDS, 2009: 13). This has led to deep mistrust between government, CSOs and the international community.

In summary, the process of expansion and contraction of civic space in Sudan is complex. The broad OECD definition of civic space, presented at the beginning of this chapter, is appropriate for Sudan; understanding and analysis of how civic space has expanded and contracted over time must go beyond analysis of the regulatory environment, to take account of how people and communities themselves have responded, sometimes pushing open civic space despite the respective authorities' attempts to control it. One KI described how the resistance committees in the last year 'expanded their space, to meet needs, but it's a dangerous space because of how they are perceived by the warring parties'. External influences such as international aid funding also have an impact.

Chapter 4 Humanitarian space in Sudan since the 1980s

Humanitarian space can be defined as the governmental, political, social and institutional environment that enables people affected by humanitarian crises to exercise their rights to receive humanitarian assistance and protection when it is required and in line with recognised principles, standards and norms (Mardini, 2021). For the purposes of this research, we focus particularly on humanitarian access in terms of 'humanitarian actors' ability to reach populations affected by crisis, as well as an affected population's ability to access humanitarian assistance and services' (OCHA, 2010). This is intrinsically linked to civic space, analysed in the preceding chapter.

4.1 Humanitarian space and operational access

Generally, humanitarian access by both international humanitarian actors and national actors to affected communities in Sudan has been easiest and least restricted during humanitarian crises triggered by non-conflict factors, for example drought and famine in the mid-1980s, described by one experienced Sudanese commentator as the 'heyday of humanitarian space'. But there are exceptions. In the early 1990s, for example, there was a stand-off between the relatively new al-Ingaz regime and the international community: for political reasons, the government refused to acknowledge the severity of the 'food crisis' at a time when the western-dominated international community had little political will to support a regime that had backed Iraq in the first Gulf War. The consequence was a much-delayed international humanitarian response (Buchanan-Smith and Davies, 1996). As described in Section 3.1, the responsiveness of civil society actors to the humanitarian crisis caused by floods in 2013 showed up the inadequacy of the government response and triggered the shutting down of Nafir.

Unsurprisingly, humanitarian space and operational access have been much more restricted when the humanitarian crisis is conflict-related, especially if the government is party to the conflict, similar to many other countries in the world. Bottjen (2024) explains this well:

> Controlling access of humanitarian aid, as well as movements of people and resources more broadly, has been an important military objective in most, if not all of Sudan's past wars. It has been used in counter-insurgency strategies aimed at depopulating hostile areas, as a tool to direct resources that can then be taxed or looted, or as a pull factor bringing IDPs into areas where they can be more easily controlled.

This was a major issue during the civil war in South Sudan (before secession), at least partially addressed through negotiation of Operational Lifeline Sudan (OLS), and in the Nuba Mountains in the 1990s when NMPACT (the Nuba Mountains Programme Advancing Conflict Transformation) was implemented (ibid). In both cases tripartite agreements to secure access were negotiated between the international aid community, government and armed rebel movements, drawing on humanitarian principles.

Gaining operational access was again a major issue for both international and national humanitarian actors responding to the Darfur conflict after 2003. Access was heavily controlled by HAC, particularly in terms of permission to travel and to provide assistance. State-level HAC offices received orders from federal government and from wali (state governors). In the words of one civil society leader: 'the government used this (humanitarian access) to punish citizens on their affiliations'. As Amnesty International reported in 2007: 'restrictions on the work of humanitarian agencies by government forces and armed opposition groups have narrowed the space in which humanitarian assistance can be provided in Darfur' (Amnesty International, 2007: 2 in Assal, 2016). Bureaucratic procedures were used by the state, to influence who benefited from aid and who did not (CSF, 2023). And as described in Chapter 3, this was exacerbated by the government's Sudanisation policy that prioritised pro-regime organisations, also described as 'forced localisation' (ibid: 7).

Insecurity has been a key factor affecting operational access and whether it has been judged safe for aid workers to travel to, and humanitarian relief to be dispatched to, affected communities. This is where the experience of humanitarian access and the burden of risk diverges between international and national actors, starkly demonstrated in the last year. While international humanitarian actors have had extremely limited access to most of the country since April 2023, this has been much less of an issue for national civil society actors rooted in their own communities, for example the ERRs and CBOs. This does not mean they do not also suffer from violence, harassment or attempts by the authorities to close them down. There are numerous reports of members of resistance committees and ERRs being intimidated, arrested, imprisoned and killed. But what they do have is immediate access to members of their own communities. However, they are also disproportionately shouldering the burden of risk (Shabaka, 2024a).

Since the beginning of 2024, the telecommunications blackout across much of Sudan has been one of the biggest constraints to the provision of humanitarian assistance to affected communities, particularly for local actors that cannot easily access the Bank of Khartoum's Bankak app, in order to access their bank accounts and resources provided by the Sudanese diaspora and others. Lack of resources has also been a major constraint, causing some ERRs to close down, and some community-based food interventions to stop prematurely or to operate intermittently.[15]

Humanitarian actors operating in both RSF-controlled and SAF-controlled parts of the country has been a point of tension for the government of Sudan. This has been a particular issue for national NGOs and CBOs registered with HAC, some of whom commented on the need for international humanitarian actors, particularly the United Nations (UN), to lobby with the government of Sudan on their behalf.

See Box 1 for examples of how humanitarian access for a national NGO was affected in the first three months of 2024. This was after the majority of its offices had been ransacked and looted in the early weeks of the conflict in 2023, budgets from donors were cancelled or suspended, and the majority of staff members were retrenched.

15 As reported by Birch et al. (2024), and in KIIs undertaken for this research project.

Table 1 National NGO experience of humanitarian space in Sudan, Jan–Mar 2024

Situation	Response	Wider ramifications (elsewhere in the country, beyond the humanitarian space)
January		
The repercussions of the RSF taking control of Wad Medani in December, which had become an international aid hub and well-serviced centre for IDPs, continued to be felt. International agencies and donor representatives either left the country or withdrew to cities such as Port Sudan, Gedaref and Kassala, further hampering coordination between international and national actors.	Greater dependence on the internet for coordination, but connectivity issues acting as a major constraint.	Development work continuing in parts of the country, if travel permits are available and security permits, focused on supporting livelihoods and economic empowerment.
Resistance committees and local service committees banned by many state authorities and the arrest of some of their members, causing some IDPs to move again, to towns and areas where they think assistance will be available. Registered national NGOs still able to work and sign memorandums of understanding and technical agreements with state authorities.	Pressure on national NGOs to amplify their response as unmet needs increase due to the ban on local committees and lack of other responders.	
February		
Telecommunications blackout affected most of the country as telecommunication networks become a target in the conflict.	The blackout, and absence of a functioning banking system in most parts of the country (including Darfur) meant the national NGO was unable to provide the usual evidence required by donors of receipt of cash transfers. Instead, they had to use informal service providers, and trusted individuals to facilitate cash transfers, especially in rural areas.	Development work continuing where possible, but cut back by more than 80% in favour of humanitarian action.
March		
Insecurity and conflict disrupted trade and the movement of goods to Darfur, which have to be transported in convoys with an armed escort. When certain military garrisons fell, convoys were stuck for up to three months, e.g. in Kosti, unable to move.	National NGO was unable to buy relief goods in local markets in Darfur to distribute to affected communities, or made purchases at much inflated prices, thus reducing the quantities that could be purchased and distributed.	Development work continuing where possible, but cut back by more than 80% in favour of humanitarian action.
Frequent restrictions by the local authorities on travel e.g. outside El Obeid, the state capital of North Kordofan, due to insecurity.	National NGO had to distribute relief goods (food and cash) in El Obeid town as unable to access rural areas.	

4.2 Concluding comments

This brief overview of the key factors affecting humanitarian space in Sudan demonstrates the impact of conflict, not just through insecurity but where operational access becomes part of a military or political strategy, and that the authorities' control over the distribution of humanitarian assistance can be used to reward or punish different population groups and geographical areas. The straightforward availability of funding is also a key factor.

Chapter 5 The relationship between humanitarian action and other forms of civil society activity for national actors

Few national civil society actors in Sudan assign labels (humanitarian, development or peace-building) to who they are and what they do in the way the international community does. Nevertheless, the protracted humanitarian crises in parts of Sudan, in Darfur for example, have spawned significant numbers of civil society actors that have their roots in humanitarian action. The Darfur CSO study of 2009 concluded: 'This could be explained by the nature and origin of the majority of organisations after the conflict in 2003 and the sources of funding which are mainly humanitarian' (PDS, 2009: 35). The greater availability of international humanitarian funding has undoubtedly influenced the humanitarian orientation of many registered NGOs and CBOs, although the challenge of building a sustainable organisation based on short-term humanitarian grants from international humanitarian actors was emphasised by some civil society leaders. Some national NGOs, for example SOS Sahel Sudan and the Darfur Development and Reconstruction Agency (DDRA), initially took decisions not to engage in humanitarian action, instead promoting and engaging with longer-term and sustainable development which they felt was being overlooked during the al-Ingaz regime, consciously leaving humanitarian action to the international community to lead.

A key feature of many civil society actors in Sudan, particularly those rooted in local communities, is their willingness to respond rapidly to the current needs of those communities. Thus, in the last year, almost all civil society actors in Sudan have pivoted to providing humanitarian assistance as that has been the overwhelming need. Interestingly and importantly, both SOS Sahel Sudan and DDRA have been able to continue some development projects in less conflict-affected parts of Sudan in the last year, for example supporting social cohesion, livelihoods and economic empowerment in Darfur and Kordofan.

The case of the resistance committees in the last year is particularly interesting in terms of the relationship between humanitarian action and other forms of civil society activity. Although their roots are political, indeed revolutionary, their strong community foundation means they have pivoted to the prevailing needs when needed. This was evident during the Covid-19 pandemic when ERRs were first set up to respond to that particular health crisis, for example distributing masks and assisting with burial of the dead, and also during periods of economic crisis, for example in 2021 when food prices spiralled. The pivot to becoming more humanitarian has been most pronounced in the last year as the number of ERRs multiplied.

However, their political roots have caused problems for parts of the international humanitarian community in relation to humanitarian principles to which they espouse. How could they support politically motivated organisations, even if they are doing humanitarian work, and remain neutral?

Meanwhile, the ERRs have worked hard to be accepted as frontline humanitarian responders by the conventional part of the humanitarian system. They have had to prove there is some distinction between the ERRs and their political advocacy, and that they are providing assistance impartially to all in need, although the same individuals may be involved in both the political work and humanitarian work of the

resistance committees. This process has also created tensions, as international actors ask these civil society actors to be accountable to their norms and standards, which are regarded as procedurally heavy,[16] and do not sit comfortably with ERR and resistance committee – or other mutual aid bodies' – accountability to their own communities which is at the heart of their legitimacy.[17] Meanwhile questions are being asked by some civil society actors about the international humanitarian community's own record in neutrality, having worked so closely with the former regime and been directed by HAC. Whilst requiring national civil society humanitarian responders to commit to humanitarian principles in order to be eligible for funding, there is a sense of double standards and that large parts of the international humanitarian community have not adhered to those humanitarian principles in the past, nor in the current context in terms of their relationship with government. Take, for example, their dependence on government approval for cross-border operations into non-government held parts of Sudan.

The amount of international humanitarian funding made available during major humanitarian crises can also have a significant impact on civic and humanitarian space. In the early 1990s, for example, when the al-Ingaz regime was internationally isolated, there was very limited humanitarian funding and this in turn had a negative impact on humanitarian space and civil society's ability to respond. In contrast, during the Darfur conflict from 2003 onwards, substantial flows of humanitarian aid was a key factor that contributed to the flourishing activity (and to some extent the expansion in number) of civil society actors despite government restrictions on civic space.

But it has also, at times, influenced *how* civil society actors have flourished, and which actors therefore have access to humanitarian assistance. During the early years of the Darfur conflict, for example, international actors (in particular INGOs) either withdrew their long-term support from pastoralist civil society associations, some of which they had supported in their development as civil society actors, or excluded them from humanitarian assistance because of their association with the Janjaweed, instead prioritising those displaced into camps who were usually from settled farming communities. In-depth research subsequently demonstrated the consequences of this 'partial' and often ill-informed approach, in exacerbating the vulnerability of pastoralist groups and fuelling grievance (Young et al., 2009), with evidence that pastoralist groups continued to be neglected for the following 20 years.

Despite the constraints, civil society actors engaged in humanitarian action have usually expanded in number and activity in response to humanitarian need, during the years of the Darfur conflict, and through mutual aid efforts in Sudan in 2023–2024.

16 One KI described how it took a week for a dedicated team to prepare a proposal for $75,000.

17 As reported in KIIs.

Chapter 6 Impact of 'localisation' efforts by international humanitarian actors on civic space and humanitarian space

This chapter highlights three forms of engagement between international actors and civil society actors in Sudan, pertinent to a discussion of localisation, and with significant consequences for the humanitarian response in 2023–2024.

First, there has been investment by international actors in civil society in Sudan, especially in Darfur, and North Darfur in particular, in the years following the drought and famine of the mid-1980s. Some of this investment came from large international NGOs (INGOs) that had played a major role in the humanitarian response (e.g. Oxfam) as they switched their focus to recovery and development, as well as from more developmental INGOs such as Practical Action, Norwegian Church Aid (NCA), and parts of the UN.[18] A number of new NGOs and CBOs were created which have proven remarkably resilient since, implying a rootedness in civil society, and an ability to switch between development and humanitarian action as needed. In the last year, most of them have played a leading role as frontline humanitarian responders in the areas in which they operated.

The story of SOS Sahel Sudan also fits into this first category of how international actors have engaged. Now one of Sudan's best known and most respected national NGOs, SOS Sahel Sudan was created from the country programme of an INGO, SOS Sahel International UK. The success of this particular localisation process is attributed to SOS Sahel International UK resisting creating a carbon copy of itself as a western-based INGO, but instead allowing SOS Sahel Sudan to become firmly rooted in civil society in Sudan, supporting the aspirations of the emerging national NGO leadership and staff rather than dictating to them (Buchanan-Smith, 2021). SOS Sahel Sudan is a key national actor in the current humanitarian response, working in Darfur, Kordofan, Kassala, White Nile and Red Sea states. KIs from civil society name a few INGOs (e.g. ZOA, NCA, Save the Children International, Danish Muslim Aid) that have more recently created strategic partnerships with national NGOs, supporting them over time, which has had a significant impact in strengthening them.

Second, as part of peace processes and periods of political change and transition, a number of international actors have run programmes specifically to encourage the expansion of, and advocacy for, civic space through their support for existing civil society actors. According to a number of KIs, this was

18 This includes the Kabkabiya Small Holders Charity Society, established and supported by Oxfam GB in the mid-1990s; the Rural Network of CBOs around El Fasher, established and supported by Practical Action; CBOs established under the UN Development Programme project 'Area Development Schemes' (1992 to 2002) in the Umm Kaddada area of North Darfur and in the Idd El Fursan/Rehaid Albirdi area of South Darfur; and the Kutum Agricultural Extension Development Society established by the Germany Agency for Technical Cooperation in North Darfur (PDS, 2009).

most pronounced after the signing of the CPA in contested areas such as South Kordofan and Blue Nile where programmes were implemented to build the capacity of CSOs, for example to carry out popular consultation and raise civic awareness.

In Darfur, in parallel to the high-level peace processes and agreements being negotiated at international level, there were internationally funded efforts to support local CSOs to address the underlying causes of conflict. For example, the UN Development Programme (UNDP) launched and implemented the Darfur Community Peace and Stability Fund in 2007 to strengthen community inclusiveness and cohesion and local peacebuilding structures.[19] The United States Agency for International Development (USAID) funded 'Towards Enduring Peace in Sudan' (TEPS) to improve intra- and inter-relations at the community level in North Darfur and enhance the resilience of communities to withstand social and economic shocks (TEPS, 2018). To a lesser extent, this also happened following the 2019 popular revolution through the work of organisations such as DT Global, as it continued to implement the TEPS programme, INGOs such as Pact, and Norwegian-funded organisations including NCA and Norwegian People's Aid (NPA).

Despite the withdrawal of much international funding after the coup of October 2021, some of this work continued, with a focus on rights-based issues, building social cohesion, support for citizen participation in inclusive dialogue on the future of Sudan, and community resilience, to name a few. Some of this work was done through building relationships with, and supporting the work of, the resistance committees.[20]

Third, there is the engagement between international humanitarian actors and local civil society actors, with the principal objective of providing humanitarian assistance, sometimes on a very significant scale (e.g. in Darfur since the conflict erupted in 2003), and sometimes including investment in organisational and capacity development. This is the relationship that is usually referred to as 'localisation'. As in other parts of the world, the relationship has tended to be a highly contractual one, driven by the objectives, culture, compliance and accountability requirements of the international humanitarian system (Barbelet, 2018). This transactional relationship was encouraged by HAC during the al-Ingaz regime. INGOs contracted national NGOs through a project technical agreement which limited engagement focused on the technical aspects of project implementation, rather than activities like advocacy that could contribute to the opening of civic space.[21] The power dynamics and asymmetries in the relationship between international humanitarian actors and their national partners have been captured well by the Conflict Sensitivity Facility (CSF) in the approach to capacity-building:

19 See https://mptf.undp.org/fund/dps00.

20 Indeed, many would argue that there was not enough of this kind of support to civil society in the wake of the revolution, as so many international actors focused on the Transitional Government instead.

21 Some INGOs found creative ways of dealing with this, for example referring to 'community conversations' in their technical agreements in order to continue strengthening civil society and advocacy work.

> The language used by different actor groups in Sudan when describing this dynamic is itself quite illuminating. International actors tended to perceive capacity as an obstacle to localisation, while national actors tended to feel that the international actors' perception of local capacity itself is the actual obstacle.
>
> Indeed, the deficiencies and shortcomings of most international actors are seldom highlighted, nor is their capacity questioned to the same level (CSF, 2023: 14).

The concept of 'localisation' also has an unfortunate history in Sudan due to the restrictions on humanitarian space described above. The 'Sudanisation' and other policies of government, particularly under the al-Ingaz regime, meant that this often became a highly politicised relationship as the authorities exerted political influence over which local actors could be sub-contracted and how, and it engendered high levels of distrust (ibid.).

The first and second forms of engagement described above focus more on developing resilient CSOs and the promotion and protection of civic space. The third form of engagement focused on humanitarian action has promoted national NGOs that are well adapted to working with the international aid system (e.g. are registered, have clear governance structures including boards, and have internationally recognised accountability mechanisms such as audited accounts and monitoring systems), but at the same time has created a heavy structural dependence on international actors and international aid flows. It has not been at all well suited to working with mutual aid and volunteer movements that constitute much of the frontline humanitarian response in 2023–2024.

In the challenging context of the last year, some of the flaws of these disconnected forms of engagement, and of the approach to localisation, have been thrown into sharp focus:

1. The approach to localisation has not proven 'fit for purpose' in terms of supporting the majority of civil society actors that have been the frontline humanitarian responders in the last year, the mutual aid organisations.

   According to CSF (2023), 'local responders have criticised inequitable partnerships between international and national/local NGOs, rigid bureaucratic processes, and the transfer of risk, and in the long-run, a more genuine strategy is needed that recognises the important role that local responders and civil society organisations play in the humanitarian response, as well as Sudan's political context'. (See also Shabaka (2024b).)

Examples of rigid bureaucratic processes include international actors requiring national actors to be registered with the authorities, usually HAC, and heavy due diligence processes.[22]

The consequences are captured in the following statement from Shabaka (2024b), a diaspora-led organisation with a strong focus on Sudan:

> Traditional aid and intervention frameworks have demonstrably failed, as evidenced by the desperate situation. Tales from mutual aid groups in Darfur, Khartoum, and Kassala paint a harrowing picture of a broken humanitarian system. Promises of funding and support remain as conversation, with very little trickling to the front line responders, leaving thousands struggling to survive and dying. This is a failure not just of resources but of imagination and resolve.

2. There has been a lack of adequate dialogue between different international actors, specifically between the 'solidarity-oriented' international actors which often have a deeper and more nuanced understanding of the civil society actors they have been supporting and the challenges of civic space, and the international humanitarian actors more used to a sub-contracting approach. There is a missed opportunity for the latter to learn from the former.
3. A number of the national NGOs that have been the focus of past localisation efforts have proven to be less resilient in the current context than the grassroots mutual aid organisations. Highly dependent on international funding, they have been impacted by the shortfall in humanitarian resources for Sudan in the last year. Without access to other sources of funding they are unable to cover overheads and operational costs, such as office rent and staff salaries. In addition, not all have been able to maintain their registration with HAC, for example if they do not have approved audited accounts, or an annual report that shows their achievements in the last year. A downwards spiral is set in motion: the loss of basic operational capacity and the failure to register means it is highly unlikely they will be contracted as local partners by international humanitarian actors, and so have no chance to rebuild their capacity. This begs the question of whether international actors could have done more early in the crisis to support national NGOs and to contribute to their survival and resilience as key civil society actors, rather than consider them principally as potential implementing partners to be contracted.

Yet there are some INGOs that have adapted their ways of working to the current context and to supporting mutual aid and volunteer efforts. Early in the crisis, some INGOs like NCA chose to provide support directly to their local partners instead of replacing their own looted assets. Others adapted their practices, for example requiring minimal paperwork, providing protection support and psychosocial care where needed, and setting minimum funding thresholds that do not exclude smaller informal

22 Some authors have pointed out that international organisations' instincts may be 'to tighten systems and controls' in complex crises such as Sudan's, where operational access is very constrained and decision-makers are removed from the realities on the ground. Instead, they suggest the opposite is required: 'a willingness to trust frontline workers and give them as much autonomy as possible to adjust their work as the context changes' (Birch et al., 2024: 61).

organisations (Birch et al., 2024). Some drew on their experience of supporting civil society actors and self-help groups in other highly challenging contexts such as Myanmar, for example through a model of survivor- and community-led responses.[23]

NPA is one such organisation. In order to support mutual aid groups, it adjusted its policies and procedures, reducing the paperwork required to three pages: one page for the application, explaining who the group is, and what they want to do; a one-page contract with NPA in which two individuals from the mutual aid group must be named and contact details provided; and a one-page template for reporting. It has since provided cash transfers to mutual aid groups in Sudan of $3,000 to $5,000 per transfer. The funds are deliberately for multi-sectoral interventions, for example ranging from water and sanitation, to soup kitchens, health, and protection. In practice, mutual aid groups have reported back in a number of different ways, for example sending videos and photos by WhatsApp, written feedback by WhatsApp, and in some cases providing beneficiary lists and receipts. Whilst NPA staff acknowledge the risk in working in this more flexible way, they were swayed by the even greater risk of not acting and adapting, in terms of increased suffering and loss of life. They have also been mindful of the existing accountability mechanisms within mutual aid groups and the role they play. For example, when a grant has been made, some groups have posted the amount on their Facebook page and how it is to be used, for all members to see. A number of groups are now receiving repeat cash transfers. Considering how to mitigate the protection risks for groups that receive funds is a current concern and consideration.

23 See https://odihpn.org/publication/mutual-aid-in-sudan-the-future-of-aid/, which lists 10 guiding principles.

Chapter 7 Learning for localisation policies and practices

The research findings reveal rather different perceptions of humanitarian and civic space between international humanitarian actors and national humanitarian actors, with implications for how localisation efforts are planned and implemented. From the perspective of international humanitarian actors, the complexity and interconnectedness of civic space and humanitarian space is neither well understood nor adequately explored, particularly where the primary objective of those international actors is to deliver large amounts of humanitarian assistance in very challenging circumstances. While their focus is more likely to be humanitarian space, in terms of their operational access to affected communities, there is little indication of an understanding or consideration of the influence of their decisions and actions on civic space, despite evidence of how humanitarian space and civic space are interlinked. An understanding of the latter is more likely to come from development-oriented international actors, particularly those working to support and develop civil society.

Yet national civil society actors rarely make a distinction between civic space and humanitarian space. Questions on the latter were usually met with a more general discussion on civic space, and that emerges as their main concern: how to expand civic space, and the consequences of factors that cause the contraction of that space on their activities, whether humanitarian or broader. This is not entirely surprising given the practical multi-mandate nature of most civil society actors. However, it does imply there is a need and scope for much greater consideration of civic space in localisation policies and practices, and in the dialogue between international and national humanitarian actors.

Responding to the deepening humanitarian crisis across Sudan in 2023–2024 has fundamentally challenged the international humanitarian system. It is not just the shrinking and highly inadequate levels of funding, in itself a major constraint, but the difficulties the aid system has encountered in adapting to extremely limited operational access in a context of widespread violent conflict, and adapting its ways of working to effectively support the highly active frontline responders – a diverse range of civil society actors that goes well beyond the national NGOs and CBOs that international actors usually partner with. In the words of one representative of the international humanitarian aid system:

> In a context where we are not able to deliver, civil society actors' role is vital. They are key actors in the response. Without them we can't help people as we want to [...] But the system in which we are operating requires reform. Business as usual is not as effective as it was. Localisation is not just a new element, but is key to the reform that is needed, to be culturally sensitive, conflict-sensitive, and agile.

Some of the learning/recommendations from this research for the localisation policies and practice of international humanitarian actors relate directly to the topic of the project, i.e. how to take account of and navigate civic space and humanitarian space. Some are more general on localisation, but have been raised so consistently and persistently in KIIs that they are included here.

- Effective localisation in Sudan requires a strong understanding of the context (including the historical context), and of the history and evolution of civil society, including its diversity and the roots of different actors, and specifically:
  - How civil society is organised, potential pressure points and how it can be manipulated, for example along ethnic lines as a way of restricting civic and humanitarian space. At a minimum, this deeper understanding ensures 'no harm' in the way international actors support civil society actors, and at a maximum it can inform how to work impartially and in an inclusive and conflict-sensitive way.
  - How the structure of CSOs may have evolved to survive periods of repression, for example the fluid, informal and non-hierarchical nature of youth movements in Sudan, evolving into the resistance committees, and the importance of respecting that and working with it, rather than trying to formalise those civil society actors by 'projectising' agreements that 'NGO-ise' them. A small number of humanitarian INGOs have more successfully adapted their ways of working, providing a learning opportunity for others.
- As international humanitarian actors develop a deeper understanding of civic space, as experienced by national civil society actors, and the constraints they face, they can use their lobbying and advocacy power with the relevant authorities for some of those constraints to be eased or lifted, in collaboration with their development colleagues already lobbying on civic space. This deeper understanding can also inform how local actors can best be supported, for example to ensure their own protection.
- For international humanitarian actors to achieve a deeper understanding of different and diverse civil society actors in Sudan requires more engagement and dialogue with 'solidarity-oriented' INGOs, and with other international actors that have a long-term relationship with CSOs and experience of supporting and strengthening civil society and civic space, to explore and inform how localisation policies and practice need to be adapted to the Sudan context to empower and support locally led humanitarian action.
- Localisation efforts by international humanitarian actors should go beyond strengthening the humanitarian capacity of national and local actors, to invest in building their resilience as a diverse range of civil society actors, to survive and thrive during periods of turbulence and when international aid flows may be more limited.
- For many national civil society actors in Sudan, being firmly rooted in their communities and adapting and pivoting according to the community's needs and interests is key to their operational access, and to their accountability. In a politically turbulent country that has recently experienced a popular revolution followed by a military coup, it is inevitable that some civil society actors engaged in humanitarian action have political roots. Expecting neutrality of such local actors, in line with humanitarian principles, is unrealistic and at odds with the reason why those actors have operational access. Rather than demand that all of their local partners adhere to humanitarian principles, international humanitarian actors should instead ensure their overall portfolio of partnerships is neutral and impartial, drawing on recent guidance on evaluating humanitarian action against humanitarian principles (see UNEG, 2024).
- In implementing a strategy of localisation in Sudan, there is a need to distinguish between civil society actors that may have strong connections with the international aid system (e.g. national NGOs that

have governance mechanisms and a range of policies that tend to mirror INGOs), and those that don't (e.g. community-based associations, resistance committees and ERRs), and be flexible and adaptable in how to support those different types of civil society actors. The approach to localisation cannot be blueprinted, and must be flexible in relation to the operational challenges of the context. Some international organisations (e.g. large UN agencies) are not well suited to work directly through community associations and civil society actors that are not set up as registered NGOs, so instead should work through intermediaries: either INGOs with a strong relationship with CSOs, or through consortia of national NGOs that can then work directly with community-based associations and ERRs.

- Rather than force national partners to comply with a fixed set of accountability mechanisms that are required, indeed exported by the international aid system, international organisations would do well to begin by understanding the accountability mechanisms of potential local partners (e.g. resistance committees, ERRs and associations that are rooted in local communities), and then consider how international compliance and accountability mechanisms can be adapted to respect and build upon existing accountability mechanisms rather than replace them with onerous upwards accountability mechanisms. There is an opportunity to learn from those INGOs already innovating and adapting in this way. Key to making adaptations is ensuring donors understand and agree with changes proposed.
- One of the many benefits of a locally led humanitarian response is deeper understanding of the context and especially of humanitarian needs and how those change and evolve. This means really listening to local partners on the ground, and supporting them to do needs assessments to feed into overall needs assessments compiled by international actors. It also requires flexibility in the international response which, once again, cannot be blueprinted.
- There is a need for honest and open dialogue between international and national actors about how to share risk, to ensure that it is not simply delegated by international to national partners. In the current context in Sudan this may require international actors to consider how they can help to protect national actors, and take on some element of 'duty of care' for their staff (e.g. psychosocial support).

Localisation should be approached both as a means to an end, to ensure humanitarian assistance reaches those in need through local actors that have operational access in Sudan, and as an end in itself, as a major part of the organisational and cultural reform required of the international humanitarian system, to place locally led humanitarian action centre-stage.

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