# Humanitarian Reform Has Arrived: Community-Led Responses in Sudan and the Blueprint for a New Humanitarian Architecture

Bashair Ahmed
Shabaka & SCMR

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# Abstract

Three years into Sudan's catastrophic conflict – the world's largest displacement crisis – the evidence is unambiguous: community-led responses work. Mutual Aid Groups (MAGs), such as the Emergency Response Rooms (ERRs), civil society groups and diaspora networks reached millions of people in areas where international agencies could not operate, demonstrating superior performance across the coverage, accountability, and cost-efficiency dimensions that define humanitarian effectiveness. Nevertheless, the Sudan Humanitarian Fund directed just 1% of its funding directly to local actors – among the lowest recorded globally. The gap between community capacity and institutional resourcing is not a gap of evidence. It is a gap of institutional will.

This paper makes four contributions to debates on humanitarian reform. First, it synthesises frontline evidence into actionable lessons for donors and philanthropists. Second, it introduces a Criteria Matrix for Locally Led Action, drawn from multiple localisation frameworks. Third, it presents a structural reform framework identifying four interdependent conditions for sustained community-owned humanitarian response: reorienting funding accountability toward community-defined standards; reconstructing intermediary relationships to build rather than extract; redesigning coordination to centre community governance authority; and investing in community-owned knowledge infrastructure. Fourth, it examines intermediary relationships critically, arguing that the do-no-harm principle must apply as rigorously to funding architectures as to programme activities.

The changes proposed here are not adjustments for the next year or two. They are the foundations of a generational shift in humanitarian architecture. This is not a call to dismantle international humanitarian action. It is a call to permanently restructure it – placing Sudanese civil society, and the communities it serves, at its centre.

## Keywords

Community-led humanitarianism, localisation, mutual aid, Emergency Response Rooms, Sudan, diaspora philanthropy, *nafeer*, institutional reform, intermediaries, generational humanitarian architecture

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*Full disclosure:* the author is Director of Shabaka, which facilitated the establishment of both the Crisis Coordination Unit – Sudan (Sudan Unit) and the Responders Coordination Network (RCN). The operational claims and data cited in this section are drawn from independently authored reports and verified programme documentation, not from the author's own assessment of initiatives with which she has an institutional relationship.

# List of Abbreviations

| | |
|---|---|
| ACAPS | Assessment Capacities Project |
| ALNAP | Active Learning Network for Accountability and Performance |
| CDA | Collaborative for Development Action |
| CCU | Crisis Coordination Unit |
| CHS | Core Humanitarian Standard |
| CSF | Conflict Sensitivity Facility |
| ERR | Emergency Response Room |
| FCDO | Foreign, Commonwealth & Development Office |
| GCF | Green Climate Fund |
| HDP | Humanitarian-Development-Peace (Nexus) |
| HPG | Humanitarian Policy Group (at ODI Global) |
| IASC | Inter-Agency Standing Committee |
| ICRC | International Committee of the Red Cross |
| IIED | International Institute for Environment and Development |
| IFRC | International Federation of Red Cross and Red Crescent Societies |
| INGO | International Non-Governmental Organisation |
| IOM | International Organization for Migration |
| KACE | Alkhatim Adlan Centre for Enlightenment and Human Development (KACE) |
| LCC | Localisation Coordination Council |
| LCPP | Local Capacities for Peace Project |
| LLA | Locally Led Adaptation |
| LPMF | Localisation Performance Monitoring Framework |
| MAG | Mutual Aid Group |
| NEAR | Network for Empowered Aid Response |
| NGO | Non-Governmental Organisation |
| OCHA | Office for the Coordination of Humanitarian Affairs |
| ODA | Official Development Assistance |
| ODI | Overseas Development Institute |
| RCN | Responders Coordination Network |
| RSF | Rapid Support Forces |
| SAF | Sudanese Armed Forces |
| SAPA | Sudanese American Physicians Association |
| SSHAP | Social Science in Humanitarian Action Platform |
| UN | United Nations |
| UNDP | United Nations Development Programme |
| USAID | United States Agency for International Development |
| WLO | Women-Led Organisation |

# Introduction: The Reform Moment is Here

## *1.1 Three years of crisis, three years of community leadership*

On 15 April 2023, armed conflict erupted between the Sudanese Armed Forces (SAF) and Rapid Support Forces (RSF), triggering what would become one of the world's largest and most neglected humanitarian emergencies. Three years later, over 12 million people remain displaced—nearly 25% of Sudan's population; famine conditions affect multiple regions, and cholera outbreaks compound the catastrophe. Nevertheless, this anniversary marks more than suffering. It marks three years of sustained, sophisticated, community-led humanitarian response that has outperformed the formal system by nearly every meaningful measure.

Mutual Aid Groups (MAGs), including Emergency Response Rooms (ERRs), began operations within 48–72 hours of conflict erupting—built on foundations established during Sudan's 2018–2019 revolution and COVID-19 pandemic response, and revived after the 2013 Khartoum floods. These structures did not emerge from crisis alone: they are grounded in decades of organised, rights-based civic mobilisation that long pre-dated April 2023. By the time institutional humanitarian response mobilised, ERRs had already reached millions, drawing on the *nafeer* tradition of communal solidarity and on the political consciousness forged in Sudan's resistance committees (Abbas & Abdalhadi, 2023; Sharfi, 2025; Franco-Klothos et al., 2025).

The evidence is unambiguous. Emergency Response Rooms (ERRs) have demonstrated significantly higher contextual access and operational effectiveness than international organisations, particularly in hard-to-reach and conflict-affected areas. However, consistent quantitative comparisons of delivery coverage are not available in the literature. Similarly, diaspora networks have played a critical role in rapidly mobilising and channelling resources to affected communities, often acting more quickly and with greater flexibility than formal humanitarian mechanisms, though precise comparative timelines remain under-documented. However, the Sudan Humanitarian Fund—the world's largest Country-Based Pooled Fund—allocated only 1% of $181 million directly to local and national actors, among the lowest recorded globally (OCHA, 2024; Refugees International, 2025). The gap between community capacity and funder behaviour is not a gap of evidence. It is a gap of institutional will.

**The central argument is:** Humanitarian reform has arrived not as a policy aspiration but as a lived reality in Sudan. The question for institutional donors and philanthropists is not whether to support community-led responses—the evidence is settled. The question is how to do so, and in particular whether the architecture built around that support will be equitable, criteria-driven, and genuinely transformative, or whether it will reproduce familiar hierarchies under a new language.

## *1.2 This paper's contribution*

This paper is written to inform and, at a later stage, contribute to peer-reviewed academic literature on humanitarian localisation, diaspora engagement, and decolonial approaches to crisis response.

The analysis is grounded in two primary intellectual traditions. The first is African political theory and crisis governance scholarship. Mahmood Mamdani's work on the institutional legacies of colonial governance illuminates how the administrative structures through which humanitarian aid is channelled – registration requirements, compliance frameworks, state-mediated access –

reproduce colonial logics of indirect rule that treat local actors as subjects to be managed rather than authorities to be recognised. Alex de Waal's political marketplace framework provides the analytical tools for understanding how humanitarian resources interact with conflict economies in Sudan, specifically, and Dorothea Hilhorst's scholarship on the everyday politics of humanitarian action grounds the analysis in the mundane institutional decisions – funding allocations, partnership criteria, coordination protocols – through which structural power operates.

The second tradition is decolonial theory, particularly Sabelo Ndlovu-Gatsheni's work on epistemic freedom and the coloniality of power, and Achille Mbembe's analysis of necropolitics—the governance of populations through the administration of death and abandonment. These frameworks are essential to the paper's argument that the humanitarian system's failure to resource community-led response is not merely an operational inefficiency but a manifestation of deeper structures of epistemic and material subordination that determine whose knowledge counts, whose accountability is recognised, and whose lives are treated as worthy of institutional investment.

These primary traditions are complemented by insights drawn from other branches of scholarship relevant to Sudan's position at the intersection of African, Arab, and Horn of Africa political systems. Arab political thought – including Nazih Ayubi on the nature of the Arab state and Azmi Bishara on civil society under authoritarian governance – informs the analysis of state–society relations in Sudan's specific political context, whilst Afro-Arab political economy perspectives associated with Samir Amin situate the humanitarian funding architecture within longer histories of global resource extraction. The paper also engages with systems change and institutional design literature, particularly Ramalingam's (2013) application of complexity theory to humanitarian aid, to explain why evidence of community effectiveness has consistently failed to translate into institutional reform.

On the policy side, the paper seeks to contribute to ongoing debates on humanitarian reform at a moment of significant structural disruption – deepening reductions in aid financing across major donor countries, the dismantling of established funding architectures, and growing contestation of the legitimacy and effectiveness of the international humanitarian system itself.

# 2. Conceptual Framework: Definitions, Principles, and the Terminological Question

## *2.1 Defining locally led action in Sudan*

**Working Definition: Locally Led Action in Sudan**

Locally-led action in Sudan is the recognition and resourcing of leadership already exercised by Sudanese communities and their organisations—including Emergency Response Rooms, mutual aid groups (MAGs), women-led networks, neighbourhood committees, and diaspora formations—who draw on indigenous traditions of collective solidarity, principally *nafeer* (النفير), to deliver humanitarian response, civilian protection, and social resilience. It requires that international actors restructure funding flows, accountability systems, and coordination mechanisms to support rather than supplant this leadership, ensuring that decision-making authority and resources are located where contextual knowledge, embedded presence, and community accountability already reside.

This definition, developed through participatory research and operational engagement with Sudanese practitioners and interlocutors, foregrounds intentionality and transfer. Locally led action is not merely 'involving' local actors or 'channelling through' local partners: it requires the genuine relinquishment of decision-making authority and the provision of proportionate resources to Sudanese civil society. The distinction matters because the humanitarian sector has a documented history of adopting localisation language whilst preserving existing power structures (Parry & Vogel, 2023; Larik & Kattaa, 2024).

## 2.2 The terminological landscape

This paper uses 'community-led response,' 'Mutual Aid Groups (MAGs),' 'community-based response,' and 'localisation' as related but analytically distinct concepts whose boundaries are intentionally fluid in practice — communities themselves rarely draw sharp terminological distinctions. What cuts across all terms is a core set of values: community agency in decision-making; accountability to displacement-affected communities — a term that, following Zaman et al. (2026), extends beyond the displaced/host binary to encompass the broader social fabric disrupted by conflict, which in Sudan includes academics, media workers, and formal-sector professionals whose displacement has fundamentally reshaped community capacity and the character of local response; and the centring of indigenous knowledge, social structures, and cultural traditions as primary assets rather than contextual footnotes.

Where distinctions matter analytically, this paper makes them explicit. 'Community-led' denotes that affected communities design, manage, and deliver responses, drawing on their own agency and resources — in contrast to 'community-based' approaches, where external actors work through communities without genuinely sharing authority. 'Localisation' encompasses the broader systemic reforms needed to enable community-led action, including funding architecture, coordination mechanisms, and compliance frameworks (Aloudat & Khan, 2022). The proliferation of alternative framings — 'locally-led action,' 'community-led response' — is itself revealing: these terms have emerged partly in reaction to the failures to deliver on localisation commitments and partly in response to localisation's tendency, in practice, to operate as a top-down, technocratic exercise through which Global North organisations retain the power and resources the agenda was designed to transfer.

Humanitarian principles are also under pressure, particularly neutrality. Numerous Sudanese civil society actors operate with what this paper terms engaged neutrality rather than classical humanitarian neutrality — embedded in the political history and social fabric of their communities in ways that differ fundamentally from externally imposed impartiality (Barber & Bowden, 2023; Khoury & Scott, 2024). This is a strength, not a deficiency: it enables access, credibility, and accountability that traditional actors cannot replicate. Frontline responders who navigated the 2018–2019 revolution and the post-coup resistance committees bring political consciousness to their humanitarian work, yet consistently deliver assistance across ethnic, political, and neighbourhood lines based on need (Olson et al., 2024). Funders must recognise engaged neutrality as a legitimate operational modality rather than imposing external neutrality frameworks that would undermine the very qualities making community-led responses effective.

**Working definition of 'engaged neutrality'**

Engaged neutrality is a humanitarian posture in which actors who are politically aware and socially embedded within their communities nonetheless deliver assistance based on need, such as seen in Syria, Ukraine and Gaza. It stands in contrast to classical humanitarian neutrality, which requires actors to refrain from taking sides in hostilities or engaging in controversies of a political nature. Engaged neutrality is distinct from 'principled pragmatism' (Slim, 2020) in that it does not treat political awareness as a tactical accommodation within an otherwise apolitical framework; rather, it recognises that humanitarian actors' political consciousness—forged through civic movements and community accountability—is itself a resource for impartial service delivery, not an obstacle to it (Sezgin & Dijkzeul, 2016).

As Slim (2020) argues, neutral humanitarian action represents one version of humanitarianism rather than its only legitimate form, and demanding neutrality as a universal standard excludes local organisations that lack the resources and diplomatic networks to engage with all parties to a conflict, yet remain committed to impartial, needs-based assistance (Barber & Bowden, 2023; Degett, 2025).

Field research across 13 Sudanese states by the Crisis Coordination Unit (CCU) Sudan) confirms that this is not a theoretical distinction. Grassroots groups navigate multiple de facto authorities – SAF, RSF, armed movement factions, and native administration structures – through continuous, high-risk community mediation rather than by asserting formal neutrality claims. Humanitarian access in these fragmented environments functions not as a guaranteed right but as an ongoing exercise in locally negotiated legitimacy, with community leaders intervening to shield volunteers from security actors, leveraging pre-existing social capital and trust (Musa, 2026). This operational reality is precisely what engaged neutrality describes: a principled commitment to serving affected populations, sustained through relational accountability to the community rather than through institutional distance from conflict actors.

### *2.3 Five conceptual domains*

**Community-led humanitarian response** refers to emergency assistance organised and delivered by affected communities themselves, drawing on indigenous traditions, local knowledge, and social networks rather than external actors (Abbas & Abdalhadi, 2023; Carter & Satti, 2025).

***Nafeer* (النفير)** is a Sudanese cultural tradition, literally meaning 'the call to mobilise'—a communal mobilisation rooted in centuries of collective agricultural cooperation and, more recently, civic resistance. *Nafeer* embeds collective responsibility, voluntary participation, and distributed leadership (Sharfi, 2025; Conflict Sensitivity Facility, 2025).

**Localisation** describes recognising, respecting, and strengthening leadership by local and national actors. The 2016 Grand Bargain committed to channelling at least 25% of humanitarian funding directly to local actors; implementation remains severely limited (IFRC, 2023; Development Initiatives, 2024).

**The Humanitarian-Development-Peace (HDP) nexus** provides an integrated framework addressing root causes whilst meeting immediate needs. ERRs operationalise this nexus by delivering humanitarian assistance whilst building governance capacity and social cohesion—

making them uniquely placed as the bridge between emergency and recovery (UNDP, 2025; OECD, 2022).

**Decolonial approaches** to humanitarian action require not merely diversifying personnel or translating documents but transforming the epistemic foundations of humanitarian practice—centring knowledge produced by and with affected communities and dismantling institutional frameworks that position Global South actors as recipients of Northern expertise (Ndlovu-Gatsheni, 2018; Clarke et al., 2024; Degett, 2025).

# 3. Sudan's Crisis Context: Catastrophe and Community Response

## *3.1 Scale of the crisis*

Sudan's conflict generated the world's largest displacement crisis within months. By January 2026, over 12 million people had been displaced—8.2 million internally and 3.8 million as refugees in neighbouring countries. Acute food insecurity affects over 24 million people; famine has been confirmed in multiple states. Cholera outbreaks beginning in August 2024 spread rapidly, with case fatality rates exceeding 3% in some states. Economic collapse compounded humanitarian needs, as the Sudanese pound depreciated sharply and formal employment disappeared for millions (OCHA, 2025; Global Humanitarian Overview, 2025).

## *3.2 Emergency Response Rooms: Community-led infrastructure*

Emergency Response Rooms are community-based, volunteer-operated structures that coordinate emergency assistance, evacuations, medical care, food distribution, and protection services across Sudan's conflict-affected areas. By December 2024, they had assisted over 11.5 million people – likely reaching more affected populations than formal humanitarian operations in many areas, though precise comparative data remain difficult to verify given the fragmentation of access (Abbas & Abdalhadi, 2023; Olson et al., 2024). ERRs received international recognition, including the 2025 Chatham House Award, 2025 Right Livelihood Award and the 2025 Rafto Prize. They were nominated for the Nobel Peace Prize by the Peace Research Institute Oslo.

ERRs did not emerge de novo. Their organisational DNA is the product of a layered history of Sudanese civic mobilisation that Abbas and Abdalhadi (2023) trace through several distinct phases. The deepest layer is the *nafeer* (نفير) tradition – centuries of communal mobilisation rooted in collective agricultural cooperation, mutual aid, and distributed leadership that has shaped Sudanese social organisation across rural and, increasingly, urban settings (Ibrahim, 2007; Sharfi, 2025). *Nafeer* is not a metaphor for solidarity; it is a governance practice with established norms of voluntary participation, collective responsibility, and community accountability that contemporary ERRs have consciously adapted to the demands of urban conflict response.

The modern organisational lineage begins with the neighbourhood committees (lijān al-ḥayy) that coordinated community responses to the devastating 2013 Khartoum floods. As Albahari and Schultz (2017) document, over 12,000 volunteers mobilised under the *Nafeer* Initiative banner, demonstrating that horizontal, trust-based coordination could organise large-scale emergency response without institutional direction. These neighbourhood structures proved durable: they evolved into the resistance committees (lijān al-muqāwama) that organised mass

civil disobedience from 2013 onwards and became the organisational backbone of the 2018–2019 revolution that overthrew the al-Bashir regime (Right Livelihood, 2025; Khair, 2024).

During the revolution, resistance committees developed the specific organisational capacities — decentralised coordination across neighbourhoods, rapid information-sharing through trusted networks, resource mobilisation under conditions of state repression — that would prove essential to humanitarian response. Abbas and Abdalhadi (2023) emphasise that this period was formative: the committees built dense networks of trust, accumulated social capital, and established horizontal modes of organisation that transcended ethnic, regional, and political boundaries. Sudanese universities functioned as critical nodes in this process, producing not only educated cadres but spaces of solidarity and collective action from which community support initiatives — fundraising campaigns, medical convoys, neighbourhood welfare systems — radiated outward (Musa, 2026).

The ERR model as a distinct organisational form emerged during the COVID-19 pandemic in 2020, when resistance committees adapted their political infrastructure to coordinate public health responses at the neighbourhood level (Abbas & Abdalhadi, 2023; Olson et al., 2024). This adaptation was neither incidental nor improvised: it reflected a deliberate recognition, documented by Abbas and Abdalhadi (2023), that the horizontal, trust-based structures developed for political mobilisation could be repurposed for service delivery — and that doing so strengthened both community welfare and the legitimacy of civic structures during the fragile transitional period following al-Bashir's fall.

When full-scale conflict erupted on 15 April 2023, ERRs mobilised within 48–72 hours, scaling nationally from their neighbourhood base to coordinate humanitarian response across multiple states. The speed of this mobilisation was not spontaneous; it was the activation of organisational capacity built over a decade. Each ERR operates at the neighbourhood level with intimate knowledge of local populations, needs, and resources. Volunteers include teachers, doctors, engineers, and community members whose collective commitment is rooted in both the deep *nafeer* tradition and the political consciousness forged through years of resistance (Abbas & Abdalhadi, 2023; Carter & Satti, 2025). As Abbas and Abdalhadi (2023) document in their operational analysis, the ERR model's effectiveness derives from three structural features: decentralised decision-making that allows adaptation to hyper-local conditions; network resilience that enables the broader system to absorb disruption to individual nodes without collapsing; and community accountability mechanisms rooted in social proximity rather than formal compliance — volunteers are accountable to neighbours, not to distant institutions.

The Sudanese diaspora maintained relationships with these evolving structures throughout the 2010s — relationships characterised by mutual support, financial contributions, and critical engagement on governance, inclusion, and accountability. These bonds of trust, tested and deepened during the 2019 revolution, enabled rapid coordination when conflict erupted: diaspora networks could channel resources to ERRs because the relationships of trust and mutual accountability were already established (Abbas & Abdalhadi, 2023; Shabaka & IOM, 2023). This pre-existing relational infrastructure — not ad hoc crisis fundraising — is what distinguishes the Sudanese diaspora humanitarian response from conventional remittance flows.

## *3.3 Diaspora networks: Beyond kinship*

Sudanese diaspora communities mobilised immediately, drawing on kinship, religious, and regional networks that extend well beyond family ties. Pre-conflict remittances reached approximately $1.5 billion annually. When conflict disrupted formal banking systems, diaspora networks adapted, using informal channels to ensure funds reached families and communities (Migration Data Portal, 2023; Shabaka & IOM, 2023). Diaspora contributions extended far beyond financial transfers: medical professionals conducted telemedicine consultations, engineers provided remote infrastructure advice, and teachers coordinated educational continuity. Regional and religious networks—particularly mosque and community centre networks in diaspora hubs—served as critical coordination nodes (Centre for Pan African Studies et al., 2024).

## *3.4 Engaging critiques honestly*

Robust analysis requires direct engagement with documented limitations of community-led humanitarian action.

**Community representation.** Sudan is home to over 600 distinct ethnic and tribal communities. No single structure can represent this diversity without deliberate, ongoing inclusivity mechanisms. Concerns about whether ERRs reflect elite segments of resistance committee networks deserve serious attention. For example, early ERR leadership in Khartoum disproportionately drew on educated, Arabic-speaking urban professionals with prior experience in resistance committees, raising questions about the representation of peripheral communities, non-Arabic-speaking populations, and those without prior political mobilisation histories. In response, ERR networks in Darfur and eastern Sudan developed distinct governance structures reflecting local ethnic and linguistic diversity rather than replicating the Khartoum model. These concerns have, in practice, driven a higher standard of representational accountability than is typically applied to international programming (Olson et al., 2024; Lough et al., 2022).

**Volunteer burnout and protection.** Frontline responders have operated under extraordinary stress in active conflict zones, facing detention and violence—including RSF retribution specifically targeting mutual aid activity (The New Humanitarian, 2025; Shabaka, 2024). Volunteer protection is a prerequisite for response continuity, not merely a welfare concern. Funders who benefit from volunteer labour carry a moral responsibility to resource their protection.

**Safeguarding.** Community-led structures typically operate with less formalised safeguarding documentation than international NGOs, reflecting context rather than negligence. Community oversight and reputational accountability often serve as effective substitutes for formal compliance mechanisms. Progressive funders work with community groups to develop contextually appropriate safeguarding approaches that reflect community values rather than imported frameworks (Carter & Satti, 2025; Posada & Ahimbisibwe, 2025).

**Political economy.** Local actors are not immune to the political economy of conflict and may have complex relationships with conflict actors. The structural framework presented in this paper explicitly acknowledges that 'engaged neutrality' differs from classical humanitarian neutrality, and that this requires conflict-sensitive accompaniment rather than naïve assumptions of community innocence (Carter & Satti, 2025). A critical analytical distinction must be maintained between community-led mutual aid structures operating through horizontal social

accountability and formalised NGOs operating within institutional governance frameworks. Recent governance crises at organisations that have publicly championed localisation and decolonisation agendas (The New Humanitarian, 2026) demonstrate that institutional governance failures are not arguments against community-led response; they are arguments for recognising the categorically different accountability mechanisms through which community-embedded structures operate.

The risks of political co-optation are not hypothetical. In Khartoum State, authorities have issued decrees prohibiting voluntary work without prior state coordination, effectively criminalising independent grassroots response and replacing revolutionary Change and Services Committees with state-appointed Steering Committees (Musa, 2026). In parts of Darfur and Kordofan, armed movement factions have established parallel humanitarian management structures that integrate aid delivery directly into political and military governance. These dynamics illustrate that the threat to community-led response comes not only from international institutional inertia but from active attempts by conflict parties to absorb, redirect, or suppress the very structures whose independence this paper argues must be protected.

# 4. Criteria for Locally Led Action: A Matrix for Philanthropic Decision-Making

A central contribution of this paper is to move beyond aspirational commitments to locally led action toward clear, operationalised criteria that funders can apply in funding decisions. The Criteria Matrix for Locally Led Action presented below synthesises evidence from the frontline evidence base alongside indicators drawn from multiple established localisation frameworks across the humanitarian and climate adaptation sectors:

- Bond's localisation and locally led development resources (Bond, 2022, 2024);
- The Conrad N. Hilton Foundation's Roles for Philanthropy in the Humanitarian Sector (2020);
- The IASC Guidance on Strengthening Participation, Representation and Leadership of Local and National Actors (2021) and Guidance on the Provision of Overheads to Local and National Partners (2022);
- NEAR's Localisation Policy Note, Policy Note on Coordination and Complementarity, and Localisation Performance Measurement Framework (LPMF);
- the IIED's Principles for Locally Led Adaptation (Soanes et al., 2021); and
- The Green Climate Fund's Direct Access and Enhanced Direct Access modalities.

The criteria are organised around six Guiding Principles, each of which translates into key criteria and practical indicators. Crucially, each indicator is mapped to its source framework(s), enabling transparency about the evidence base and facilitating cross-sectoral learning.

These criteria serve a dual purpose. They provide accountability standards—benchmarks against which funders can assess whether their own practices constitute genuine localisation or merely its rhetorical performance. They also serve as positive design tools—enabling funders to structure grant-making, partnership agreements, and coordination mechanisms in ways that embed community leadership from the outset, not as an afterthought.

The matrix is designed to be context-adaptable rather than prescriptive. While Sudan serves as the primary case study and blueprint, the guiding principles and indicator logic are transferable across crisis-affected settings. The language indicator, for example, specifies Arabic and Sudanese Arabic for the Sudan context. However, the underlying principle—that local and

national languages must be accepted as primary reporting languages—applies universally. Similarly, the emphasis on cross-sectoral learning reflects a deliberate synthesis: humanitarian frameworks such as the Grand Bargain and climate adaptation frameworks such as the IIED Principles address overlapping challenges of power, funding flows, and community agency, yet rarely inform one another systematically.

The indicators include clear key performance indicators (KPIs) with measurable thresholds where possible (e.g., minimum 25% direct funding, 50% community-led decision-making, 30-day disbursement timelines). These thresholds are proposed as voluntary benchmarks rather than binding commitments. This is a deliberate choice. The evidence from the Grand Bargain's 25% funding target and the USAID Localisation Agenda's similar commitment demonstrates that there are binding numerical targets. In contrast, politically significant, have consistently failed to translate into practice: the Grand Bargain target remains unmet after nearly a decade, and USAID's progress stalled at approximately 10–12% of eligible funding. The sector's evolution requires frameworks that are aspirational yet actionable, with built-in mechanisms for iterative learning rather than compliance theatre.

**Table 1. Criteria Matrix for Locally Led Action in Sudan: Guiding Principles, Criteria, Indicators, and Source Frameworks**

| Guiding Principle | Key Criteria | Practical Indicators | Source Framework(s) |
|---|---|---|---|
| **Agility** | Efficient Funding | ▪ Delivery within 30 days of grant approval<br>▪ Simplified due diligence proportionate to grant size and context<br>▪ Alternative verification channels for unregistered community groups<br>Minimum 7% overhead/core cost recovery for all local partners, equalised with international rates (IASC, 2022) | ▪ Grand Bargain (2016)<br>▪ IASC Guidance on Overheads (2022)<br>▪ USAID Localization Agenda (2021)<br>NEAR LPMF: Funding component |
| **Durable Solutions** | Community Ownership | ▪ Minimum 50% community-led decisions on programme design and resource allocation<br>▪ Community endorsement is treated as the primary verification mechanism<br>Conflict-adapted feedback mechanisms enabling community accountability to affected populations | ▪ IIED LLA Principles 1 & 8 (2021)<br>▪ NEAR LPMF: Participation component<br>Bond locally led development resources (2022) |
| **Diverse Pathways** | Inclusive Partnerships | ▪ Prioritise partners with contextual understanding and embedded community presence<br>▪ Balance formal and informal actor support; avoid privileging registration status over effectiveness.<br>▪ 'Engaged neutrality' is formally recognised as a legitimate operational modality.<br>Minimum 50% Sudanese national leadership across funded organisations, with a separate minimum 30% women's representation in governance and decision-making roles | ▪ Hilton Foundation Roles for Philanthropy (2020)<br>▪ IASC Guidance on L/NA Participation (2021)<br>▪ NEAR Policy Note: Coordination & Complementarity<br>GCF Direct Access model (2010) |
| **Decolonial Approaches** | Sustainable Capacity | ▪ Effectiveness and reach as primary accountability metrics, not compliance volume<br>▪ Mentoring and accompaniment without imposing organisational restructuring<br>▪ Locally appropriate accountability systems developed with communities, not for them<br>Minimum 15% of budgets designated for community-defined capacity development | ▪ NEAR LPMF: Capacity component<br>▪ Bond decolonisation framework (2024)<br>▪ IIED LLA Principles 5 & 6 (2021)<br>Grand Bargain 3.0 (2023–2026) |

| **Value Maximisation** | Complementary Coordination | ▪ Minimum 50% local participation in coordination platforms with meaningful decision-making authority<br>▪ Support community-level coordination forums as the primary coordination locus.<br>▪ Light-touch conflict monitoring embedded in coordination without imposing external surveillance.<br>National and community languages are accepted as primary reporting languages, with translation support provided by funders rather than imposed on community organisations. For Sudan, this means Arabic (Modern Standard and Sudanese dialects) as the default, with provision for other community languages where MAGs predominantly operate in those languages and translation capacity exists. | ▪ IASC Guidance on L/NA Participation (2021)<br>▪ NEAR Policy Note: Coordination & Complementarity<br>▪ IIED LLA Principle 7 (2021)<br>GCA Adapt Now (2019) |
|---|---|---|---|
| **Direct Funding** | Resource Flow Benchmarks | ▪ Minimum 25% of humanitarian funding to local actors, with the majority to national organisations directly (not via international NGO sub-grants)<br>▪ Reduce intermediary layers; develop context-specific direct funding channels.<br>Multi-year commitments (minimum three years) to enable strategic rather than reactive programming | ▪ Grand Bargain 25% target (2016)<br>▪ GCF Direct Access & Enhanced Direct Access<br>▪ USAID Localization Agenda (2021)<br>NEAR LPMF: Funding component |

*Note. KPI thresholds are proposed as voluntary benchmarks. 'Minimum' figures represent aspirational floors informed by existing framework commitments, not binding requirements. Context-specific adaptation is encouraged.*

## 4.1 Applying the criteria: Differentiated implementation

The Criteria Matrix must be applied with sensitivity to context. Sudan's crisis spans multiple governance zones with fundamentally different operating conditions. The structural model presented here is designed for contexts where community social infrastructure pre-dates and outlasts external humanitarian deployment, and where state capacity is severely disrupted. It is less directly applicable to natural disaster contexts with intact state capacity, where government coordination structures may provide legitimate and effective frameworks for response. The model's generalisability is strongest in contexts of protracted conflict, state fragility, and displacement.

- **By actor type:** Mutual aid groups **require umbrella funding with minimal compliance barriers that do not impose formalisation,** thereby undermining their community character and even increasing protection risks. Specifically, harmful formalisation includes mandatory legal registration that exposes volunteer networks to state surveillance or armed group targeting; financial auditing requirements calibrated to INGO-scale operations that consume volunteer capacity; and organisational structuring demands (e.g., boards, constitutions, HR policies) that replace organic accountability to communities with bureaucratic compliance. Formal national NGOs benefit from direct funding with simplified reporting. Diaspora groups require channel-funding mechanisms that can operate through third countries where Sudanese access to banking is restricted. Community groups require small grants through pooled funds with community-endorsed verification.
- **By geography:** Government-controlled areas require formal systems with additional safeguards against political interference. RSF-controlled areas demand alternative delivery mechanisms bypassing captured formal systems. Contested areas require multiple parallel pathways with active conflict-sensitivity monitoring. Border and displacement areas require coordination with receiving country systems.

- **By response phase:** Immediate emergency response requires maximum speed and flexibility with higher risk tolerance. Protracted crisis demands sustainable systems and multi-year partnerships. Recovery preparation requires explicit linkages to humanitarian-development-peace nexus frameworks, positioning community structures as foundations for future governance.
- **Paradigm shift required:** Applying these criteria demands movement across three axes: from risk avoidance to balanced risk management; from supply-driven to demand-responsive programming; and from controlling to enabling partnerships. Each shift requires institutional change—in governance structures, incentive systems, and the professional formation of humanitarian practitioners.

# 5. Intermediaries: Equitable Relationships, Not Gatekeeping

Intermediary organisations occupy a structurally ambiguous position in the humanitarian ecosystem. At their best, they absorb compliance burdens from community actors, facilitate verification, and connect local organisations to resources they could not access independently. At their worst, they reproduce the power hierarchies they purport to dismantle—extracting overheads, controlling information flows, and positioning themselves as essential bridges rather than temporary scaffolding (Bryant, 2022; Lough et al., 2022). The do-no-harm principle, applied rigorously in programme design, must be applied with equal rigour to funding architectures and intermediary relationships. Intermediaries can cause harm—inadvertently or structurally—through paternalism, gatekeeping, and inequitable resource extraction, even where intentions are progressive.

## *5.1 The spectrum of intermediary function*

Sudan's experience illustrates the breadth of the intermediary landscape. Sudanese NGO intermediaries—such as Adeela and the Khatim Adlan Centre (KACE)—operate as registered Sudanese organisations that bridge community actors and external funders. They combine the contextual credibility of embedded actors with sufficient institutional form to meet donor requirements. Their proximity to affected communities and shared political history with Sudanese civil society distinguish them from international intermediaries.

International intermediaries—such as Proximity2Humanity (P2H), the Centre for Disaster Philanthropy (CDP), and the Norwegian Refugee Council—provide access to donor networks, compliance infrastructure, and technical expertise that many community organisations lack. Technical support organisations—ALNAP, the Centre for Humanitarian Leadership, the Conflict Sensitivity Facility, and Shabaka—provide in-kind expertise without financial intermediation, reducing the risk of dependency whilst building capacity (ALNAP & Share Trust, 2024).

## *5.2 Principles for equitable intermediary relationships*

Based on Sudan's experience and the broader evidence base, five principles distinguish equitable intermediary relationships from gatekeeping:

- **Transparency of terms**. Intermediaries must publish overhead rates, disbursement timelines, and sub-grant terms. Hidden cost structures—where intermediaries retain disproportionate shares through management fees, indirect costs, or in-kind contributions counted against community budgets—are incompatible with equitable partnership. Community actors must be able to negotiate terms, not merely accept them.

- **Diminishing rather than entrenching intermediary role**. Equitable intermediaries actively work to reduce community dependence on their own services. This means investing in community partners' administrative and compliance capabilities, openly sharing donor contacts, and supporting as direct community-to-funder relationships mature. An intermediary that positions itself as permanently essential has failed its mandate. Otherwise, they risk being/becoming like those companies that make money from delivering resources and services in 'high-risk' contexts.
- **Community accountability, not upward accountability**. Intermediaries' primary accountability must be to the communities they serve, not to the donors who fund them. This requires governance structures that include community representation with meaningful authority, community feedback mechanisms in local languages, and genuine responsiveness to community priorities rather than donor preferences.
- **Do-no-harm due diligence**. Intermediaries must conduct proactive harm analysis of their own operational footprint: whether their presence displaces community actors, whether their compliance requirements exclude the most proximate and effective responders, and whether their reporting and verification practices expose community members to digital security risks or conflict actor attention (Kreutzer et al., 2025; ICRC, 2024).
- **Equitable overhead and cost recovery.** Local intermediaries and community organisations must receive the same overhead rates as international organisations—a minimum 7% of programme costs—with recognition of the unique operational costs of functioning in conflict settings. Differential overhead rates reproduce the structural disadvantages they ostensibly seek to address.

## *5.3 Red flags: Identifying gatekeeping in practice*

The indicators below emerged from a combination of empirical findings and normative reasoning about risks that may undermine do-no-harm principles and ethical behaviour in humanitarian intermediation.[1] Several are documented in the growing evidence base on intermediary behaviour in humanitarian funding chains; others represent analytical extrapolations from observed patterns to potential harms that have not yet been systematically studied but warrant philanthropic vigilance.

The empirical record is increasingly clear on certain gatekeeping dynamics. The Grand Bargain Intermediary Caucus found that intermediaries frequently act as funding gatekeepers whilst retaining decision-making power over allocations, and that local and national actors are often excluded from joint planning and meaningful participation in programme design (IASC, 2022). Communication control is a recurrent mechanism: intermediaries may mediate or limit direct relationship-building between funders and community organisations, creating an information asymmetry that sustains dependency. Research on women-led organisations has documented what Frangieh (2024) describes as an unintentional 'gatekeeping system,' in which local actors become reliant on in-country INGOs or UN agencies to access donor funding because direct

[1] *The 'do no harm' principle, as applied in humanitarian settings, derives from Anderson's (1999) framework developed through the Local Capacities for Peace Project (LCPP). It holds that humanitarian interventions, however well-intentioned, inevitably interact with conflict dynamics and social structures, and that actors bear responsibility for understanding and minimising the unintended negative consequences of their assistance — including the exacerbation of inter-group tensions, the reinforcement of power asymmetries, and the creation of aid dependencies. The principle has since been incorporated into broader conflict-sensitivity frameworks and is widely treated as a minimum standard for humanitarian practice (Anderson, 1999; Slim, 2015).*

engagement with donor decision-makers is structurally foreclosed. Carpi (2018) has argued, drawing on ethnographic research in Lebanon, that intermediaries in humanitarian settings can function as a shortcut to localisation, enabling international actors to claim local engagement without ceding decision-making authority — what she terms an 'unintended alliance' between humanitarian internationals and local gatekeepers. The ODI Humanitarian Policy Group has documented the financial dimension of this gatekeeping, finding that local actors are routinely signed into exploitative sub-contractual arrangements where overhead extraction by intermediaries exceeds allocations to community partners — in many cases, local organisations receive between 4 and 7 per cent indirect cost recovery, if they receive anything at all, whilst bearing disproportionate operational and fiduciary risk (Sturridge, Essex-Lettieri et al., 2025). The resource-flow logic of intermediation is thereby reversed: those closest to affected populations absorb the greatest costs whilst retaining the least institutional support. Parry and Vogel (2023), examining twenty years of UN localisation practice in Iraq, demonstrate how localisation discourse itself can reproduce power inequalities among local actors — systematically sidelining civil society organisations whilst treating local non-governmental actors as subcontractors with limited decision-making authority.

Other indicators, whilst consistent with these documented dynamics, are normative rather than empirically documented at scale and should be treated as warranting scrutiny rather than as established findings. These include: grant agreements that require community organisations to sub-contract exclusively through the intermediary, effectively preventing alternative funding pathways; reporting requirements imposed on community sub-grantees that are more burdensome than those the intermediary itself faces from its own donor; intermediary positioning in coordination forums as the representative voice of community organisations rather than facilitating direct community participation — including convening discussions about community groups without their representation; capacity-strengthening activities designed to align community organisations with intermediary operational models rather than investing in community-defined systems and priorities; and the development of proposals and programmes with no or limited involvement of the groups they purport to serve. The Lough, Barbelet and Njeri (2022) synthesis of inclusion and exclusion dynamics across four humanitarian contexts found that community-based targeting and participation mechanisms often replicate pre-existing social hierarchies, and that intermediary structures and agency incentives can drive exclusion even when inclusion is the stated objective. Philanthropic actors should treat the presence of these indicators — whether observed or normative — as grounds for deeper due diligence into the quality of intermediary relationships.

Sudan-specific evidence corroborates these dynamics. The Crisis Coordination Unit's field research documents a pattern of 'identity coercion,' in which women's unions have been compelled to rebrand as Emergency Response Rooms solely to access donor funding that excludes traditional civil society structures, whilst international funding models impose complex organisational requirements without providing adequate operational budgets — placing volunteers in ethically and financially untenable positions (Musa, 2026). Financial transfer fees of 10 to 20 per cent further erode the resources reaching community actors. These findings illustrate how capacity-strengthening activities and funding conditionalities can function as alignment mechanisms rather than genuine enablement, reshaping community organisations to fit intermediary and donor operational models rather than investing in community-defined systems.

### 5.4 The LCC and F-System as intermediary alternatives

The Localisation Coordination Council (LCC) represents a fundamentally different model: indigenous coordination infrastructure designed by and for Sudanese responders, which performs intermediary functions without the structural dynamics of external intermediation. Unlike traditional intermediary models, the LCC centres community actors as decision-makers whilst facilitating connections to external resources (Localisation Coordination Council, 2025; Refugees International, 2025).

LCC membership includes representatives from 13 state-level ERR networks and 9 national Sudanese organisations. The F-System—Framework for Mutual Aid Emergency Response—provides standardised accountability processes in Arabic, achieving 2–3 week timelines from proposal to disbursement whilst maintaining verification integrity. This system demonstrates that accountability and speed are not inherently in tension: they are in tension only when accountability frameworks are designed for institutional comfort rather than community functionality (Abbas & Abdalhadi, 2023).

Philanthropists should prioritise the LCC model and equivalent community-controlled coordination structures for intermediary functions, treating external international intermediaries as transitional instruments rather than permanent fixtures of the funding architecture.

**Do-no-harm checklist for intermediary relationships:** Before engaging an intermediary, funders should ask: (1) What proportion of funds reach community actors after overhead deduction? (2) Do community organisations have meaningful input into grant terms? (3) Does the intermediary support direct community-funder relationships or restrict them? (4) Are the digital security implications of data sharing with intermediaries assessed? (5) Does the intermediary's presence crowd out direct community-led coordination? (6) For international intermediaries, is there an exit plan when they withdraw or hand over to local actors?

## 6. A Structural Architecture for Systemic Humanitarian Transformation

The central analytical claim of this paper is not that community-led humanitarian response works—that claim is now established by three years of evidence from Sudan alone—but that the conditions under which it can work at scale, with adequate resources and institutional legitimacy, remain systematically absent. This section articulates the reform architecture connecting structural reform of donor and intermediary behaviour to sustained, community-owned humanitarian response. It draws on comparative evidence from Sudan, Gaza, Yemen, Haiti, and Iraq. It embeds insights from systems change and institutional design to explain why reform has so consistently stalled and what structural interventions are necessary to move it forward.

The framing departs explicitly from the dominant approach to humanitarian reform, which has treated localisation as a programming orientation requiring practitioner attitude change. This has produced two decades of reform commitment alongside negligible measurable change in power or resource distribution (Parry & Vogel, 2023). The framework presented here treats humanitarian architecture as a system governed by incentive structures, default norms, and accountability arrangements—not by the values of individual practitioners. Durable change,

therefore, requires redesigning the system itself: changing what is easy, expected, and rewarded, rather than exhorting practitioners to choose the harder path.

## *6.1 The Problem of Structural Inertia: Why Evidence Is Insufficient*

Three years of Sudan's conflict have generated one of the most thoroughly documented cases of community-led humanitarian effectiveness in recent history. ERRs reached over 11.5 million people operating outside formal humanitarian structures. The Sudan Humanitarian Fund—the world's largest Country-Based Pooled Fund—allocated 1% of $181 million directly to local and national actors, among the lowest recorded globally (OCHA, 2024). Diaspora networks mobilised and disbursed resources at timelines the formal system cannot approach. The empirical gap between community-led and internationally led performance has been documented, published, and widely cited. The funding gap has widened, nonetheless.

By "practitioners," this analysis encompasses all actors whose decisions shape humanitarian resource allocation—from FCDO and State Department officials determining bilateral funding priorities to UN agency programme managers to INGO country directors to members of pooled fund allocation committees. This persistence of practice in the face of contradicting evidence is not aberrant. It reflects three structural properties of institutional humanitarian systems that operate independently of what practitioners, who are not policymakers, know or value, and that evidence alone cannot displace.

The first is institutional path dependency. As Sezgin and Dijkzeul (2016) document in their analysis of 'new humanitarians,' the institutional architecture of international humanitarian action was not designed to accommodate the forms of community-led response that have emerged in Sudan and elsewhere; its path dependencies actively resist their incorporation. Humanitarian organisations developed their compliance requirements, partnership criteria, and coordination models in a context where international actors held genuine comparative advantages in logistics, diplomatic access, and financial infrastructure. These models have become embedded in organisational culture and donor requirements in ways that generate self-reinforcing momentum: adapting them imposes transition costs on individuals who bear those costs personally, whilst the benefits—greater community effectiveness—accrue diffusely and are attributed to context rather than institutional design. The result is what the comparative evidence characterises as systemic 'going local without localising': community actors are recruited into international frameworks rather than international frameworks adapting to community realities (Khoury & Scott, 2024). In Sudan, this dynamic is visible in the Sudan Humanitarian Fund's allocation patterns: despite Sudanese civil society, particularly mutual aid groups such as the ERRs, demonstrating superior reach and community accountability, the Fund channelled 99% of its $181 million through international organisations whose compliance frameworks these groups and organisations could not meet—not because they lacked accountability, but because the Fund's accountability architecture was designed for a different type of actor (OCHA, 2024; Refugees International, 2025).

The second structural property is asymmetric loss accounting. The costs of visible accountability failure—misused funds, audit findings, reputational damage—are immediate, attributable, and personally borne by the practitioners responsible. The costs of ineffective response—populations unreached, dependency created, community structures undermined—are diffuse, delayed, and attributed to conflict or capacity rather than to institutional design choices. This asymmetry is not a function of values; it is a function of how accountability is structured. When costs are asymmetrically distributed, rational institutional actors will systematically weigh the

manageable risk of ineffective response over the personally consequential risk of compliance failure, regardless of their commitment to locally led principles. Carter and Satti (2025) document precisely this dynamic: donors who understand that ERRs outperform formal actors continue to impose compliance requirements calibrated to international NGOs because the institutional cost of departure from standard practice exceeds the institutional cost of limited reach.

The third property is norm anchoring. Existing coordination templates, reporting formats, due diligence frameworks, and funding modalities function as the reference point against which any proposed alternative is evaluated. Alternatives must justify their departure from the norm; the norm itself requires no justification. This creates a structural disadvantage for community-led approaches, irrespective of their evidence base: they are positioned as exceptions requiring special pleading rather than as the default from which formal approaches must depart. Parry and Vogel's (2023) twenty-year analysis of localisation in Iraq demonstrates how this anchoring allows institutions to absorb reform language whilst preserving unchanged the power relations that determine which actors receive resources and authority.

Contemporary humanitarian accountability systems evolved from colonial administrative structures—the elaborate reporting requirements and financial controls that European powers developed, often in response to scandals of colonial extraction (Ferguson, 1990; Barnett, 2011). These systems have been overlaid with Cold War-era norms prioritising state-to-state relations and, more recently, counter-terrorism compliance frameworks that treat informal community structures as inherently suspect (Fassin, 2012; Quijano, 2000). Legal constraints compound institutional inertia. In Germany, federal procurement law constrains how government funding can be contracted, creating structural barriers regardless of political will. Similar constraints operate across OECD donor bureaucracies. The direction of resource flows creates its own accountability logic: those who control resources determine how they are allocated (Slim, 2002; Li, 2007). Donor governments' primary accountability runs to domestic constituencies—taxpayers, voters, parliamentary oversight committees—rather than to affected populations. A distinction must be drawn between institutional donors (governments) and philanthropic actors (foundations and the private sector). Philanthropists have carved niches precisely because they can tolerate different risk profiles, even when deploying similar norms and processes (Mosse, 2005; Martín-Moruno et al., 2020).

**The reform implication:** If structural inertia is maintained by path dependency, asymmetric accountability, and norm anchoring—rather than by ignorance or bad values—then durable reform requires changing the structures that produce those dynamics. Specifically, it requires making community-accountable practice the institutional default, equalising the costs of compliance failure and impact failure, and redesigning the reference points against which funding decisions are made. Evidence is necessary but not sufficient; architecture is the lever.

## 6.2 The Pathway: Four Interdependent Structural Conditions

The pathway from current practice to sustained, community-owned humanitarian response runs through four mutually reinforcing structural conditions. These are not sequential stages: each depends on the other, and weakness in any one, constrains the rest. The Grand Bargain's commitment to channel at least 25% of humanitarian funding directly to local and national actors,

and the Charter for Change's localisation guiding principles, provide the normative architecture within which these structural conditions operate—yet they have proved insufficient alone to shift practice without deeper institutional redesign (IFRC, 2023; IASC, 2024).

One explanation for this insufficiency is that existing frameworks consist of commitments, pledges, and guidelines rather than binding legal obligations—a design reflecting the political reality that voluntary standards are easier to negotiate than enforceable rules. However, even where policy requirements do exist, such as USAID's localisation targets under Administrator Samantha Power, implementation has remained uneven and vulnerable to political reversal. This suggests that formal requirements, whilst necessary, are not sufficient. The persistence of institutional practices that contradict stated commitments indicates that the obstacle is not merely procedural but dispositional: the assumptions, risk calculations, and professional norms that shape everyday decision-making within donor agencies and international organisations remain calibrated to an older model of humanitarian action. Structural reform must therefore operate on two levels simultaneously: redesigning the institutional architecture that shapes incentives and shifting the professional cultures and cognitive frames that determine how actors interpret and respond to those incentives.

### *Condition I. Reorienting funding accountability toward community-defined standards*

The primary lever of systemic change is the redesign of funding architecture. So long as compliance is calibrated to institutional rather than community standards, community actors face a structural tax on their most important asset: proximity to and accountability toward affected populations. Khoury and Scott (2024) term this 'constitutive power'—through funding conditions, donors actively define who counts as a humanitarian actor, systematically advantaging those who can absorb compliance overhead over those with the deepest community rootedness.

Reorienting accountability requires making community endorsement a primary verification mechanism of equivalent procedural weight to financial audit, so that the question 'does the community attest to this organisation's effectiveness?' carries the same institutional force as 'can this organisation produce audited accounts?' It requires equalising overhead cost recovery between local and international actors, removing what currently functions as a structural subsidy to institutional distance. Furthermore, it requires establishing multi-year funding commitments of a minimum of three years as the default position from which funders must consciously depart, rather than single-year grants as the default that community organisations must repeatedly overcome (Refugees International, 2025; OCHA, 2024).

This is not a technical reconfiguration of reporting templates. It is a redesign of the institutional default: making community-accountable practice the position that requires no justification and requiring funders who cannot meet community accountability standards to explain that departure. The Localisation Coordination Council's F-System demonstrates the viability of this reorientation in practice: Arabic-language templates with community-referenced verification achieve disbursement timelines of two to three weeks—timelines that international compliance frameworks cannot approach—whilst maintaining rigorous standards of accountability (Localisation Coordination Council, 2025). The F-System functions as a 'commitment device'. By establishing an alternative accountability architecture that community actors control, it creates the conditions for community actors to maintain accountability to communities rather than being compelled to choose between community accountability and funder access.

Nevertheless, achieving this reorientation faces a fundamental obstacle: donors face genuine accountability pressures from parliaments, boards, and publics that measure success by expenditure rates rather than community satisfaction. The productive response is not to ask donors to abandon fiduciary responsibility, but to demonstrate that community feedback is itself fiduciary responsibility—that ignoring it constitutes a failure of due diligence. Evidence consistently shows that programmes designed without community input waste resources: CDA Collaborative's Listening Project, gathering perspectives from nearly 6,000 people across 20 countries, found that communities want smarter aid, not more aid—and that when their voice is absent, programmes fail in predictable ways (Anderson et al., 2012). The resulting waste dwarfs any savings from streamlined consultation.

Several mechanisms can operationalise this reorientation. Ground Truth Solutions has demonstrated that systematic perception tracking can generate actionable data for donors, with their findings now reaching major decision-making fora, including the Good Humanitarian Donorship meeting and OCHA donor support groups (Ground Truth Solutions, 2023; Swedish International Development Cooperation Agency, 2024). The Core Humanitarian Standard verification scheme offers a framework linking community accountability to quality assurance, with humanitarian networks working to ensure CHS certification satisfies donor due diligence requirements—reframing accountability not as an additional burden but as evidence that compliance is already met (CHS Alliance, 2024; Steering Committee for Humanitarian Response, n.d.). Research increasingly supports making downward accountability a condition of funding rather than a voluntary add-on (Noble et al., 2025). The critical insight from this evidence is that feedback loops must be closed: where community voice is gathered but not visibly acted upon, mechanisms become extractive rather than transformative (Bonino et al., 2014; Dhungana, 2021). The F-System avoids this trap by locating the verification authority with communities themselves rather than treating community voice as data to be extracted upward.

### *Condition II. Reconstructing intermediary relationships to build rather than extract*

Intermediaries are structurally pivotal: they determine whether resources reach community actors with minimal friction or are substantially captured by compliance overhead; whether community actors develop direct funder relationships or remain permanently dependent on intermediary gatekeeping; and whether accountability ultimately flows to communities or to donors (Bryant, 2022; Lough et al., 2022). The characteristic failure mode of humanitarian intermediation—documented across Iraq, Sudan, Bangladesh, and Jordan—is the transition of organisations designed as transitional conduits into institutions incentivised to perpetuate their own centrality. This occurs not because intermediaries are bad actors but because their institutional incentives reward relationship maintenance over relationship transfer.

An enabling intermediary relationship is structurally distinguished from a gatekeeping one by a single design criterion: whether the intermediary's governance is explicitly organised to reduce its own indispensability over time. This requires community representation with genuine authority over intermediary governance structures; transparent disclosure of overhead rates and disbursement timelines as contractual obligations; and active, funded support for the development of direct community-to-funder relationships, even when this diminishes the intermediary's own volume. The Sudanese NGO intermediary model—organisations such as Adeela and KACE, which share political history and cultural proximity with ERRs whilst possessing sufficient institutional form to meet donor criteria—offers a structurally more equitable architecture than international intermediation precisely because its accountability is

closer to community constituents. Posada and Ahimbisibwe (2025) find across Iraq, Palestine, Ukraine, Kenya, the Philippines, Sudan, and Colombia that this proximity to communities is the most consistent predictor of intermediary performance: it functions as an endogenous accountability mechanism that external compliance requirements cannot replicate.

A significant risk requiring active management is the co-optation of local intermediaries by international actors—whether through acquisition, contractual dependency, or structural incentives that make local organisations primarily accountable to international funders rather than community constituencies. The perverse effects of localisation policies in other contexts provide cautionary evidence: in Kenya, locally registered subsidiaries of multinational consulting firms have accessed funds notionally earmarked for "local" actors, reproducing international control under local legal form (Banks et al., 2015; Holm-Nielsen et al., 2023; INTRAC, n.d.). Preventing this requires that "local" be defined substantively—by governance, accountability relationships, and community embeddedness—rather than merely by registration jurisdiction. Funders should conduct beneficial ownership and governance analysis as part of due diligence (Mitchell et al., 2020; Schuller, 2012).

### *Condition III. Redesigning coordination to centre community governance authority*

The cluster system was designed for a context in which international agencies were the primary operational actors, and coordination meant aligning internationally deployed capacity. In Sudan's 2023 crisis, this design assumption became empirically false before it was institutionally acknowledged: ERRs were coordinating response in areas the cluster system could not access, yet coordination forums continued to operate on the premise that community actors were informational inputs to international planning rather than primary decision-making authorities. Lough et al. (2022) document this as a systematic pattern across Nigeria, Bangladesh, Jordan, and the Philippines: community actors are incorporated, if not coopted, into humanitarian coordination as informants but excluded as governors. This dynamic reproduces the power asymmetries that localisation is intended to dismantle.

The LCC model demonstrates an alternative coordination architecture: Sudanese-led forums as the primary decision-making structures, with international actors participating as contributors rather than governing as authorities. The significance of this inversion extends beyond efficiency. It restructures the institutional default for decision-making authority: community actors no longer seek permission to contribute to internationally governed processes; international actors seek an invitation to contribute to community-governed ones. When coordination architecture is designed this way, community authority is structural rather than contingent on the goodwill of international practitioners—it is encoded in the forum's rules rather than dependent on individual relationships.

This mirrors a pattern observed in effective health governance transitions across the Global South, where community health boards with genuine budgetary authority—rather than consultative roles—produced systematically better outcomes than equivalents with advisory functions alone (Clarke et al., 2024). Authority must be genuine to produce the accountability effects that make community governance valuable; consultative inclusion without decision-making power reproduces the appearance of participation whilst preserving its substance in international hands.

### *Condition IV. Investing in community-owned knowledge infrastructure*

Knowledge production is a structural condition of power. When international researchers generate the evidence base for humanitarian reform—however sympathetic and rigorous—it remains embedded in epistemic hierarchies that shape academic publishing, donor citation practices, and policy uptake in ways that systematically undervalue knowledge produced in and by communities in crisis (Sukarieh & Tannock, 2019; Ndlovu-Gatsheni, 2018). The consequences are not merely intellectual: when communities cannot make authoritative, institutionally recognised claims about the effectiveness of their own response, they remain dependent on international validation for access to resources and decision-making forums.

The digital dimension of this epistemic hierarchy is particularly acute. An analysis of Sudan's digital space reveals that online public opinion is heavily skewed by geography, class, and historical access to resources: the dominant voices are Sudanese in Egypt and the Gulf states, whilst refugees in Chad, South Sudan, and camps in Uganda and Ethiopia – populations from historically marginalised communities – are largely absent (Musa, 2026). Communities in RSF-controlled areas face total telecommunications blackouts, relying on costly Starlink access points that carry surveillance risks. The digital narrative, in other words, is not a demographic reflection of the crisis but a reflection of privilege. This structural distortion means that policy decisions based on digitally accessible information systematically overlook the needs of the most vulnerable populations – reinforcing, rather than correcting, the epistemic hierarchies that community-owned knowledge infrastructure is designed to address.

The response to this cannot be merely methodological. Participatory research methods, however well-intentioned, remain extractive when ownership of the research agenda, analytical framework, and publication infrastructure stays with international institutions. Communities across crisis-affected contexts are increasingly refusing participation in research that consumes their time and emotional labour whilst returning nothing—no findings shared, no authorship recognised, no material benefit realised. This backlash reflects not ingratitude but an accurate assessment of where value flows. Decolonial and feminist scholarship has long identified this pattern: the extraction of knowledge from marginalised communities to advance careers and institutional interests located elsewhere, with 'participation' functioning as legitimation rather than transformation (Tuhiwai Smith, 2021; Harding, 2015).

What is required is structural investment in Sudanese research institutions, Arabic-language publication infrastructure, and community-controlled data systems—not as project components but as durable national assets. This demands long-term commitment that outlasts funding cycles and a reconceptualization of return on investment in humanitarian contexts, where value lies not in extractable outputs but in locally owned capacity. Evidence infrastructure under community governance creates a platform from which Sudanese actors can make claims about what works, what is needed, and what must change—claims that carry independent epistemic authority rather than deriving legitimacy from international endorsement.

This condition is mutually reinforcing with the others: community-owned evidence strengthens the case for community-governed coordination and funding mechanisms, which in turn create institutional space for knowledge production that serves community priorities. Without this epistemic foundation, the other structural conditions remain vulnerable to external redefinition.

## 6.3 The Temporal Architecture of Structural Change

The four structural conditions do not produce change simultaneously. Their effects accumulate across time horizons that are categorically different from programme cycles. Understanding this temporal architecture is essential to avoiding the failure mode that has characterised most humanitarian reform attempts: measuring structural change against short-term indicators calibrated for programmatic delivery and concluding that reform has failed when it has merely not yet operated on the timescale appropriate to structural transformation.

In the period of six to twelve months, the primary indicator of structural change is not outcome change in affected populations—which reflects investments made years earlier—but change in the conditions of access for community actors. Simplified compliance processes, direct funding channels with community-endorsed accountability, and formal recognition of Sudanese organisations as primary decision-making authorities in coordination forums: these are the structural foundations on which all subsequent change depends. They are not outputs to be claimed but enabling conditions to be established. Evidence infrastructure development in this phase—establishing Sudanese-led research partnerships, Arabic-language documentation systems, and community-controlled monitoring methodologies—creates the epistemic foundation for the community authority claims that later phases require.

Across twelve to twenty-four months, the structural conditions of the first phase should produce measurable shifts in resource flows and governance arrangements: the majority of humanitarian funding for Sudan flowing directly to Sudanese organisations rather than through international NGO sub-grant mechanisms; coordination frameworks that formally recognise community-led modalities including ERR-style networks that operate outside formal registration requirements; and strengthened direct relationships between Sudanese civil society and bilateral donors, bypassing the intermediary tier. These shifts are evidence not that programmatic outcomes have improved—that comes later—but that the architecture of the system has changed in ways that make community-accountable practice the institutional norm.

The two-plus-year horizon is the structural endpoint toward which the reform pathway leads: a humanitarian architecture that is effective, sustainable, and Sudanese-owned, where Sudanese civil society directs humanitarian response with adequate resources and institutional authority; affected communities exercise genuine agency in determining humanitarian priorities; and the system has adapted permanently to accommodate diverse response modalities. Critically, the foundations for recovery and governance transition at this stage are established not by external agencies planning handover but by community structures that have exercised decision-making authority throughout the preceding phases and have built the institutional memory, relationships, and legitimacy that governance requires.

**The temporal implication for funders:** Measuring locally led reform against 12-month programme indicators is equivalent to measuring the effects of structural adjustment against quarterly economic data: the timescales are categorically wrong for the change being measured. Multi-year commitments are not merely operationally helpful; they are a necessary condition for the reform pathway, because the structural changes that make community-led responses sustainable cannot be established within the timeframe of a single grant cycle. Donors who fund locally led action on short cycles are not funding structural reform; they are funding short-term service delivery with community characteristics.

## 6.4 MAGs as the Structural Bridge Across the Humanitarian-Development-Peace Nexus

A critical contribution of this structural framework is its explicit positioning of MAGs—including ERRs—as the structural bridge between the humanitarian and development phases of the HDP nexus. This positioning is not a theoretical claim about how mutual aid could function; it is a description of what mutual aid groups and broader Sudanese Civil Society are already doing in Sudan's conflict, and a framework for funding and supporting that function rather than systematically undermining it by treating community structures as emergency instruments to be stood down as stabilisation progresses.

The Darfur humanitarian response of 2003 provides the instructive counter-case. That response lasted over a decade, with negligible investment in systems-building, community governance, or local institutional capacity. External actors maintained operational primacy throughout, generating sustained dependency with limited progress toward recovery. When the formal humanitarian operation eventually contracted, the community infrastructure that might have absorbed its functions had not been invested in. The Conflict Sensitivity Facility's documentation of that period demonstrates that the costs of this design choice were predictable from its inception: treating humanitarian response as a temporary operation rather than as an opportunity to build the social infrastructure of long-term recovery produced, predictably, a context without that infrastructure when it was most needed (Conflict Sensitivity Facility, 2025).

Ferguson's (1990) concept of the "anti-politics machine" illuminates a central tension in this analysis. Classical humanitarian action, by insisting on apolitical neutrality, functions as a depoliticising apparatus—stripping crisis response of its political content and obscuring the structural conditions that produce vulnerability. MAGs' explicit political consciousness, forged in Sudan's resistance committees and revolutionary movements, represents a fundamentally different operational modality: one in which politics is visible and accountable rather than concealed behind technical programming. Engaged neutrality, as practised by ERRs, does not mean partisan alignment; it means refusing to pretend that humanitarian action operates outside the political structures that shape who suffers and who is reached. This transparency about political positioning—rather than the fiction of apoliticism—is what enables ERRs to maintain community trust and simultaneously deliver cross-ethnic services (Olson et al., 2024; Carter & Satti, 2025).

The ERRs in Sudan's current crisis are simultaneously first responders maintaining civilian survival, governance actors filling the space left by partially collapsed state institutions, and social infrastructure builders maintaining the neighbourhood networks through which post-conflict civic reconstruction will be organised. Diaspora networks are simultaneously funding medical supplies and maintaining the transnational relationships through which Sudan's global diaspora will contribute to recovery. This multi-functionality is structurally inherent to community-led response in a context of governance collapse—not a bonus feature to be acknowledged but the primary value to be invested in and protected.

Positioning MAGs as the HDP nexus bridge requires that donors make three institutional commitments that depart from standard practice. Multi-year core funding—not project-specific grants—must enable community organisations to invest in governance capacity rather than calibrating all activity to programme deliverables. Investment in community-led documentation of systems, processes, and knowledge must ensure that the institutional memory of how communities organised effective responses under extreme conditions is retained and

transmissible, regardless of displacement or staff turnover. Furthermore, an explicit linkage between humanitarian response investments and development-phase planning must ensure that the governance capacity built during the crisis is recognised and resourced as the foundation for recovery, rather than being superseded by an external recovery architecture that reproduces the dependency the community response was building beyond (OECD, 2022; UNDP, 2025).

## 6.5 Conditions, Constraints, and the Political Economy of Structural Reform

The reform architecture described above is conditional: its effects depend on assumptions about actor behaviour that cannot be guaranteed and must be actively monitored. Making these conditions explicit is not a concession to critics of locally led approaches; it is a requirement of rigorous structural analysis and responsible advocacy.

The empirical foundations of the framework are well-established. Three years of documented practice confirm that Sudanese civil society has demonstrated the capacity to deliver humanitarian assistance at scale; that community engagement produces assistance that is more contextually appropriate, more accepted, and more effectively utilised; and that flexible funding enables adaptive programming that the formal system's rigid project cycles cannot replicate (Olson et al., 2024; Carter & Satti, 2025; Posada & Ahimbisibwe, 2025). These are not assumed propositions but generalisations from a substantial evidence base, qualified by the recognition that performance is not uniform and that documented failures exist alongside documented successes.

The structurally significant conditions—those whose failure would most directly disrupt the reform pathway—concern the behaviour of international actors and donors. The architecture depends on international organisations relinquishing genuine decision-making authority, rather than delegating implementation whilst retaining strategic control: the distinction between the two is not semantic but substantive. The comparative evidence suggests that symbolic localisation—including community actors in planning forums whilst retaining international veto power over priorities—reproduces rather than dismantles the power asymmetries that make localisation necessary (Parry & Vogel, 2023; Khoury & Scott, 2024). It depends on donors accepting a recalibrated approach to risk: one that makes the costs of ineffective response as institutionally visible as the costs of compliance failure, rather than treating them as context-determined inevitabilities. Moreover, it depends on modified due diligence frameworks proving adequate for fiduciary management in practice, not merely as policy commitments.

The political economy of conflict creates constraints that require active management rather than assumption away. ERRs and other community structures operate in an environment in which warring parties actively seek to manipulate humanitarian systems. Community organisations may have complex relationships with conflict actors that affect their accountability to the populations they serve (Carter & Satti, 2025). These constraints are genuine, but they do not constitute an argument for international actor primacy: international actors operate with equivalent or greater political economy vulnerabilities in Sudan's context, are subject to equally consequential manipulation, and lack the contextual knowledge to detect it. The response is conflict-sensitive accompaniment—sustained engagement that supports community actors in navigating political economy pressures—rather than reverting to architectures that have demonstrably failed to navigate those pressures themselves.

A graduated approach to risk management, calibrating compliance requirements to grant size and organisational track record rather than imposing uniform standards, provides a practical mechanism for managing these conditions whilst preserving the reform trajectory (Carter & Satti, 2025). Accompaniment models—which embed technical support within community-led structures rather than imposing external capacity-building frameworks—address the relational dimension of reform without reproducing the dependency relationships that undermine structural change. The distinction between accompaniment and capacity-building is not rhetorical: accompaniment assumes that community actors have the capacity to lead and that external actors have knowledge to share; capacity-building assumes the inverse, with the power dynamics that assumption generates.

## *6.6 Cross-Contextual Evidence: The Generalisability of the Structural Framework*

The reform architecture presented in this section is not Sudan-specific. The four structural conditions – reoriented funding accountability, enabling intermediary relationships, community-centred coordination, and community-owned knowledge infrastructure – represent generalisable requirements for any context in which community social infrastructure pre-dates and outlasts external humanitarian deployment. What Sudan's case provides that most other contexts cannot is the combination of scale, depth of documentation, and the stark contrast between community-led and internationally led performance that makes the structural claims analytically tractable rather than merely plausible.

Gaza's neighbourhood mutual aid networks demonstrated an equivalent pattern under conditions of institutional collapse. Assali (2024) documents how community collectives maintained food production, water access, and medical coordination through mechanisms that international agencies could not replicate, drawing on pre-existing social networks and community knowledge that no external actor could substitute. The structural conditions that enabled this response—direct diaspora funding, community-controlled accountability, and insulation from the compliance requirements that would have compromised operational agility—mirror those identified in Sudan's context (Community-Led Initiatives & Local2Global Protection, 2024). Yemen's informal governance networks have performed coordination functions in contested areas where formal humanitarian presence was impossible, maintaining civilian social organisation that the formal system could not access and that has proved essential to the viability of subsequent stabilisation efforts (Salisbury, 2023).

Haiti's community organisations mobilised responses to the 2010 and 2021 earthquakes before international deployment had scaled up, establishing community governance mechanisms that proved more durable than project-based international programming. The pattern documented by Posada and Ahimbisibwe (2025) across Iraq, Palestine, Ukraine, Kenya, the Philippines, Sudan, and Colombia is consistent: community-led structures that form in response to crisis draw on pre-existing social capital and governance relationships that external actors cannot replicate; they are faster, more contextually appropriate, and more accountable to affected populations; and they are systematically under-resourced relative to their contribution and over-subjected to compliance requirements designed for the institutional actors they are outperforming.

The cross-contextual evidence yields a conclusion with significant implications for the humanitarian reform agenda: what is required is not a context-specific adjustment to an otherwise functional system, but a structural re-conceptualisation of humanitarian architecture applicable wherever communities have built social infrastructure capable of organising

collective response. Sudan demonstrates what is possible under extreme conditions and with a level of documentation that makes the structural claims unusually tractable. The structural framework extends to every major crisis context of the past two decades in which this pattern holds—which is to say, virtually all of them. The analytical task and the reform agenda extend far beyond Sudan, even as Sudan provides the most compelling available case for the urgency and feasibility of structural change.

# 7. A learning point but not a panacea

The argument made in this paper is not without boundaries, and intellectual honesty requires clearly stating them. The Sudan evidence is compelling precisely because it is extreme and well-documented; extrapolating from it requires care. This section addresses four dimensions of the argument's scope, not as defensive qualifications but as analytical sharpening. Because the reform agenda advocated here is more likely to be durable if it is clear about what it is not claiming, and more capable of navigating legitimate critique if its limits are stated rather than assumed.

The first and most important clarification concerns the role of international humanitarian action. This paper argues for a fundamental reorientation of humanitarian resources and authority toward community-led actors; it does not argue for the withdrawal of international humanitarian capacity. International organisations retain critical and irreplaceable functions: large-scale logistics at the onset of rapid-onset disasters; diplomatic access negotiation; technical specialisations in engineering, nutrition, and health systems; cross-border coordination; and the mobilisation of political will among UN member states, especially Security Council members. The argument is for complementarity rather than substitution—for a genuine division of labour in which international actors do what they can uniquely do, community actors do what they can uniquely do, and the allocation of resources and authority reflects rather than distorts that comparative advantage. The current system systematically distorts it in favour of international actors. Correcting that distortion does not mean eliminating the international role; it means right-sizing it.

The second clarification concerns risk. This paper does not claim that community-led structures are inherently safer, more accountable, or more equitable than international organisations. The evidence reviewed in Section 3.4 documents elite capture, exclusion along gender and ethnic lines, digital security vulnerabilities, volunteer burnout, and political economy entanglements that affect community-led structures and all humanitarian actors operating in conflict environments. The point is not that community-led responses are risk-free, but that the risk management frameworks currently applied to community actors are calibrated to institutional templates that generate their own forms of risk—inaccessibility, dependency creation, extractive knowledge and other practices—that those frameworks render invisible. A more honest risk analysis would account for the full portfolio of risks on all sides, including the risk of ineffective response and the risk of perpetuating dependency, rather than treating only the compliance risks visible to auditors as risks worth managing.

The third clarification concerns scope. Sudan's case is analytically distinctive in its combination of scale, depth of documentation, and the stark divergence between community-led and internationally led effectiveness. This combination makes the structural claims tractable in a way that shorter-term or less well-documented cases cannot. Nevertheless, the structural argument—that institutional path dependency, asymmetric risk framing, and norm anchoring systematically undermine community-led response across humanitarian contexts—is generalisable. Equivalent

dynamics have been documented in Iraq (Parry & Vogel, 2023), Syria (Khoury & Scott, 2024), Gaza (Assali, 2024), and across the multi-country evidence base synthesised by Posada and Ahimbisibwe (2025). Sudan demonstrates what is possible under extreme conditions. The Conflict Sensitivity Facility's (2025) localisation analysis and the CSF's Making Sense of Localisation in Sudan (2024) provide essential contextual specificity. The structural framework is not Sudan-specific, but its application requires the constant contextual grounding that only proximity to specific communities can provide.

The fourth clarification is perhaps the most important for how this argument is received. This paper does not romanticise community-led responses, nor does it treat *Nafeer* or any other indigenous practice as a timeless, unchanging essence of Sudanese culture to be preserved in amber. *Nafeer* is a living governance tradition that has evolved across centuries in response to changing social, economic, and political conditions—and Sudanese practitioners have consciously adapted it to the specific demands of urban conflict response in the twenty-first century. Treating it as folklore rather than sophisticated governance, or invoking it as an 'authentic' counterpoint to 'inauthentic' international practice, risks the very essentialism that decolonial critique identifies as a subtler form of the same epistemic subordination it challenges. The argument of this paper is grounded in evidence of effectiveness, institutional analysis, and structural critique—not in the claim that Sudanese communities are, in some pre-political way, closer to 'the ground' than international actors. They are closer to the affected populations, with deeper contextual knowledge and stronger accountability relationships. That is an empirical and institutional claim, not a romantic one, and it is that claim—not its romanticised shadow—that should guide reform.

Having stated these limits, the affirmative argument must be restated with equal clarity. Humanitarian reform has arrived as a lived reality in Sudan. The architecture of the humanitarian system is in flux—driven not by institutional willingness but by the demonstrated incapacity of existing institutions to function under Sudan's conditions and the demonstrated capacity of community structures to function where institutions cannot. The window for embedding this shift into durable institutional change—rather than allowing it to be absorbed as a temporary exception to unchanged normal practice—is open but not indefinitely. Philanthropists, institutional donors, and policy actors have a choice, and the analysis in this paper is intended to make the structural dimensions of that choice as clear as possible.

The early 2025 suspension of United States Agency for International Development (USAID) funding provides a stark natural experiment in how international aid volatility affects community-led structures. USAID had been Sudan's largest humanitarian donor, contributing 44 per cent of the $1.8 billion 2024 humanitarian response (Al Jazeera, 2025). Emergency Response Rooms had increasingly integrated into this funding architecture: by 2025, approximately 77 per cent of their operational budget derived from USAID's Bureau for Humanitarian Assistance (Elobaid, cited in Washington Post, 2025; NBC News, 2025). When stop-work orders took effect in January 2025, 80 per cent of the 1,460 community kitchens operating across Sudan were forced to close, cutting off food access for an estimated 1.8 million people already facing famine conditions (Kuka, cited in Al Jazeera, 2025; Middle East Eye, 2025). The humanitarian impact was immediate and severe: malnutrition rates surged, and children died from starvation in areas where kitchens had been the sole remaining food source (Washington Post, 2025; Christian Science Monitor, 2025).

Quantitative data from field research across 72 grassroots initiatives corroborates this pattern: 75 per cent of surveyed groups identified funding shortages as their most significant

operational challenge, yet their primary funding sources were local organisations, individuals inside Sudan, and community events – with international mechanisms representing a minority of funding streams despite the scale of available resources within the global humanitarian system (Musa, 2026). This funding profile confirms that community-led structures are sustained primarily through local social contracts rather than international aid architecture, making them simultaneously more resilient to external funding shocks and more vulnerable to the structural exclusion from international mechanisms that this paper analyses.

Nevertheless, the crisis also revealed a paradoxical form of resilience. ERRs that had maintained stronger ties to diaspora networks and local fundraising—rather than becoming dependent on international funding streams—proved more insulated from the volatility. Within weeks, diaspora donations and Ramadan giving enabled approximately 37 per cent of shuttered kitchens to reopen, even as formal international funding remained frozen (Kuka, cited in Al Jazeera, 2025). The Funders for Mutual Aid in Sudan coalition, launched in September 2024 at the Clinton Global Initiative with a $2 million commitment, expanded its pledge to $16 million by September 2025—demonstrating that philanthropic channels could partially compensate for governmental retrenchment (Centre for Disaster Philanthropy, 2025). The European Union pledged €522 million at the April 2025 London conference, with ERR representatives actively seeking direct funding relationships to bypass intermediaries (European Commission, 2025; Al Jazeera, 2025).

This pattern suggests that community-led structures face a double bind: integration into international funding systems provides resources for scale but creates vulnerability to political shifts in donor capitals; remaining outside those systems preserves autonomy but constrains capacity. The USAID suspension has intensified resource strain on mutual aid networks while simultaneously creating space for ERRs to demonstrate their value proposition as the only humanitarian actors capable of reaching famine-affected populations when formal systems fail. As one ACAPS assessment noted, ERRs are currently the primary aid providers able to reach those struggling to survive in much of Sudan, precisely because their community embeddedness allows them to operate in areas where international actors cannot (ACAPS, 2025). Whether this visibility translates into sustained, flexible funding—rather than another cycle of dependence followed by abandonment—remains the central question for the localisation agenda.

## 8. From Structural Analysis to Institutional Practice

The structural analysis in the preceding sections points toward concrete institutional decisions. This section draws those analytical threads into an integrated reform agenda, organised not as a checklist but as a coherent account of how behaviour, incentives, and institutional design must shift – across immediate, medium-term, and generational horizons – if the structural conditions identified in this paper are to be established and sustained. The argument, throughout, is that durable change requires redesigning the systems within which humanitarian decisions are made, not merely persuading practitioners to make different decisions within unchanged systems. Ben Ramalingam's framework in Aid on the Edge of Chaos (2013) remains instructive: humanitarian systems exhibit the properties of complex adaptive systems, in which sustainable change requires attending to feedback loops, incentive structures, and emergent institutional behaviour—not linear programme logic.

## *8.1 Restructuring the Conditions of Decision-Making: The Immediate Horizon*

The most immediate priority for funders is not programmatic but architectural: identifying and activating the funding channels and verification frameworks that make community-accountable practice possible before the next crisis cycle demands it.

### *Pooled risk and collective donor action*

The Funders for Mutual Aid in Sudan coalition, whose commitment has grown to at least $16 million in direct, flexible emergency grants (Centre for Disaster Philanthropy, 2025), demonstrates that collective action among donors can restructure the default conditions of funding access. Individual funders should position their Sudan portfolios within or alongside this coalition, using pooled risk frameworks that reduce the individual compliance burden whilst enabling commitments that exceed what any single institution can make alone.

### *Verification as an epistemic decision*

The verification question is central and often treated as purely technical when it is fundamentally political. ALNAP and Share Trust have established that community testimonials, peer references, and social media documentation – the forms of evidence available for ERRs and MAGs – are valid verification instruments when combined with clear accountability frameworks (ALNAP & Share Trust, 2024). The decision to accept or reject these forms of evidence is not a technical compliance decision; it is a decision about whose knowledge counts as knowledge and whose accountability counts as accountability. Funders who commit in writing to accepting community-endorsed verification, and who publish that commitment publicly, create a reference point against which their own future behaviour can be held. This is the mechanism by which individual funder decisions become structural: not through heroic individual commitment but through public commitment that generates its own accountability dynamic.

Field evidence from Sudan demonstrates why these verification forms carry authority: community legitimacy is built primarily through sustained, direct engagement in everyday social spaces – markets, home visits, mosques, and churches – rather than through digital documentation or formal reporting (Musa, 2026). The accountability mechanisms through which grassroots groups maintain trust are relational and embedded, not procedural and extractive. Verification instruments that reflect these accountability structures are therefore not second-best alternatives to formal compliance systems; they are more accurate measures of the operational reality they purport to assess.

### *Funding coordination as enabling infrastructure*

Coordination infrastructure must be funded proactively rather than treated as overhead to be minimised. The Localisation Coordination Council, the Sudan Unit's cross-sector facilitation platform, and the Responders Coordination Network provide the connective tissue without which community-led response remains fragmented and invisible to funders. The Sudan Unit operates as an enabler, not an implementer – brokering connections, curating information, and facilitating access to expertise across the humanitarian, recovery, development, and peacebuilding continuum without taking financial responsibilities for any bodies (Sudan Unit, 2025). The RCN provides a neutral, safe space for frontline first responders to coordinate, share information, and strengthen collective advocacy in environments where centralised

coordination is constrained by insecurity (RCN, 2025). Both initiatives embody the coordination architecture that the reformed system requires.

Both operate under funding constraints that are structurally produced by the same institutional biases this paper analyses: coordination infrastructure is not easily mapped to programme deliverables, does not produce the visible outputs that reporting templates recognise, and is therefore systematically under-resourced relative to its enabling value. Correcting this requires funders to explicitly designate coordination and protection infrastructure as fundable categories, with multi-year commitments at levels that reflect the enabling multiplier effect documented by the Sudan Unit pilot, suggesting a leverage ratio that far exceeds conventional programme investment (Sudan Unit, 2025).

The Sudan Unit's own field research articulates this enabling function from the perspective of grassroots actors themselves: Sudanese intermediary organisations should be recognised as 'functional partners within the response system, not substitutes for grassroots actors,' providing contextual analysis, specialised services, risk management support, and translation between local realities and international systems without monopolising representation or decision-making (Musa, 2026). This formulation — enablement without substitution — is the operational definition of equitable intermediation that the reformed system requires.

## *8.2 Rebalancing Institutional Incentives: The Medium-Term Horizon*

The medium-term reform horizon is where structural change either embeds or stalls. The immediate actions described above create new reference points and funding channels; the medium-term challenge is making those new reference points the institutional default rather than the exception. This requires attention to the incentive structures that govern individual practitioner behaviour, rather than only to the policies that govern institutional positioning.

### *Multi-year funding as the contractual baseline*

Multi-year funding commitments — a minimum of three years as the contractual baseline — are the single most consequential structural change available to donors. The evidence from Sudan, Yemen, and Gaza is consistent: community organisations calibrate their programming to available funding horizons, and short-cycle funding produces short-cycle programming that cannot address the medium-term governance and social infrastructure building required by the HDP nexus. Three-year core funding allows community organisations to invest in staff retention, institutional memory, and adaptive programming. It also changes the accountability relationship: an organisation receiving a three-year commitment has time to demonstrate impact rather than perpetually justifying its existence. It can invest in the community-controlled evidence infrastructure that makes that demonstration possible on community terms. Donors who publish transition plans that explain how multi-year commitments will evolve create an additional accountability mechanism: their stated intentions serve as a reference point for external evaluation.

Cross-variable analysis of Sudanese grassroots initiatives confirms this relationship: groups established before 2020 exhibit higher levels of governance capacity, community legitimacy, and partnership development, whereas groups formed during the crisis (2023–2024) tend to operate primarily through emergency response logics (Musa, 2026). Seventy-five per cent of surveyed groups have already developed written internal regulations — challenging prevailing assumptions that grassroots initiatives are merely spontaneous or informal — but this

organisational maturation correlates with temporal stability rather than externally imposed compliance frameworks. The implication for funders is direct: multi-year commitments do not merely extend existing programming; they create the temporal conditions within which community-defined governance can develop.

*Community governance with real authority*

Community governance of programme decisions is the medium-term test of whether coordination reform has produced structural change or symbolic inclusion. Community advisory panels with genuine budgetary authority – not consultative recommendations but actual decision-making power over a defined proportion of programme allocation – are the institutional form of this test. The evidence from health governance transitions across the Global South, synthesised by Clarke et al. (2024), is unambiguous: community boards with real authority produce better outcomes than their advisory counterparts. The translation to humanitarian programming is direct. Governance authority must be real to produce the accountability effects that make community governance worth having; and governance that is real can be documented, evaluated, and held to community standards rather than institutional ones.

*Evidence infrastructure and intermediary accountability*

The medium-term horizon is also the period in which the evidence infrastructure described in Section 6.2 must be established. Funding documentation and learning systems that enable community organisations to capture evidence of their effectiveness in formats accessible to both community members and international audiences create the foundation for the longer-term structural shift in epistemic authority. Intermediary audits – systematic mapping of all intermediary relationships against the equitable relationship principles described in Section 5.2 – provide a diagnostic tool for identifying where existing partnerships require renegotiation and where they are functioning as genuine enablers.

*Compliance reform and the Grand Bargain*

Bilateral donors and ODA departments have a specific role at this horizon: advocating within Grand Bargain 3.0 caucuses for binding commitments rather than aspirational targets and developing formal humanitarian AML/CTF exemption frameworks that reduce due diligence burdens for intermediaries working with community-level actors. This compliance architecture most directly blocks community access to resources at scale.

## *8.3 Building for Generations: The Long Horizon*

The most important shift in framing that this paper advocates is temporal. The changes proposed here are not intended for Sudan's current crisis, the next funding appeal, or the next two years. They are the architecture of a humanitarian system that can serve crisis-affected communities for the coming decades – through the climate emergencies that Sudan's environment already signals (SAPA, 2025), through the governance crises that population displacement and resource competition will generate, and through the forms of complex emergencies that no current planning framework adequately anticipates. Ramalingam's analysis in Aid on the Edge of Chaos (2013) is prescient here: the humanitarian system's failure to build adaptive capacity – its preference for legible, controllable, programme-deliverable interventions over the messy, contextually embedded, community-governed systems that

actually produce resilience – is not merely an efficiency problem. It is a structural vulnerability that will be repeatedly exposed, at increasing cost, by the complexity of twenty-first-century crises.

### *Endowments and diasporic sovereignty*

Generational humanitarian architecture requires institutional forms that outlast individual projects, donor cycles, and crises. Endowments seeded by diaspora giving for community-led organisations create reserve capacity that insulates community responders from the donor funding cycles that currently force them into perpetual vulnerability; they are also an expression of diasporic sovereignty over community welfare that no international funding architecture can replicate. The Ireland Funds (over $600 million distributed since 1976), the Hayastan All-Armenian Fund (more than $350 million in development projects since 1992), and the Palestinian Welfare Association – Taawon (nearly $900 million invested in Palestinian development since 1983) – illustrate how diaspora philanthropy and endowment-style funding models can sustain civil society institutions across generations of displacement and conflict (Shain & Barth, 2003; Kasbarian, 2015; Hanafi, 2010).

### *Forecast-based financing for armed conflict*

Forecast-based financing for armed conflict – adapting the IFRC climate model to pre-position flexible funds for automatic deployment when conflict severity indicators cross defined thresholds – addresses the most immediate structural failure: the lag between crisis onset and community access to resources during the window when community structures are most effective and most under-resourced.

### *Regional research consortia and a Sudanese-owned evidence-based*

Regional research consortia – including university partners in Sudan, the Horn of Africa, and the Arab world – build on emerging networks such as the Sussex Centre for Migration Research's Red Sea Network to generate a Sudanese-owned evidence base through which community actors can make authoritative claims across decades rather than within individual project cycles.

### *Formal recognition of community-led coordination*

Formal recognition of community-led coordination structures as primary coordination bodies within the humanitarian architecture, with commensurate resourcing and governance authority, institutionalises the structural shift supported by the evidence. These are not aspirations for a different future. They are the operational requirements of a humanitarian system fit for the crises this century will produce, and the minimum that the communities who have demonstrated their capacity at such cost deserve in return.

Grassroots groups themselves conceptualise their role in these generational terms. When asked about their envisioned post-war function, 70.8 per cent of surveyed initiatives identified promoting a culture of peace as their primary future role, followed by rehabilitating basic services (61.1 per cent) and supporting livelihoods (58.3 per cent); transitional justice, reintegration of displaced persons, and supporting voluntary return were also cited by approximately one-third of respondents (Musa, 2026). These self-defined priorities map directly onto the humanitarian-development-peace continuum that the international system has struggled to operationalise. They also confirm that community-led structures are not merely

emergency mechanisms awaiting replacement by formal institutions; they are the institutional foundation upon which long-term recovery and peacebuilding will depend.

*Accountability for the reform agenda*

Accountability for this agenda cannot be deferred. Each funder engaging with Sudan should designate a named individual responsible for monitoring progress against these structural commitments, with annual public reporting to stakeholders. The Criteria Matrix introduced in Section 4 provides the operational tools for that accountability. The structural reform framework in Section 6 articulates the pathway. The LCC, the ERRs, and numerous other groups and networks are the institutions through which that accountability becomes meaningful. What is required is the institutional decision to treat them as primary rather than supplementary – not in principle, but in resource allocation, governance authority, and the daily decisions through which institutional priorities are expressed.

## 9. Conclusion: The Opportunity Must Not Be Squandered

The humanitarian sector's interregnum – where, in Gramsci's formulation (1971), 'the old is dying, and the new cannot be born' – is not a theoretical condition. It is the operational reality of Sudan's crisis. For three years, community-led structures have sustained life where the international system could not. Mutual aid groups, ERRs, civil society organisations, and diaspora networks have operated as primary humanitarian actors – not as supplements to a functioning system, but as the system itself in its absence. The evidence is no longer in question. What remains in question is whether the institutional architecture of humanitarian response will be redesigned to reflect that evidence, or whether it will absorb the language of community leadership whilst preserving unchanged the power relations that determine who receives resources and who does not.

This paper has argued that the obstacle is structural, not informational. Path dependency, asymmetric loss accounting, and norm anchoring produce a system in which practitioners who understand that community-led responses outperform formal mechanisms continue to fund, coordinate, and evaluate as though they do not. Overcoming this requires not exhortation but institutional redesign: reorienting funding accountability toward community-defined standards; reconstructing intermediary relationships so that they build capacity rather than extract it; redesigning coordination to centre community governance authority; and investing in community-owned knowledge infrastructure through which Sudanese actors can make authoritative claims on their own terms. The Criteria Matrix introduced in this paper provides the operational tools. The structural reform framework articulates the pathway. The LCC, the ERRs, and the broader ecosystem of Sudanese coordination infrastructure demonstrate that the institutional capacity to receive and deploy reformed resources already exists.

The war did not create Sudan's grassroots organisational forms; it revealed their depth, resilience, and centrality at a moment of institutional collapse (Musa, 2026). These structures are grounded in centuries of *nafeer* tradition, decades of civic mobilisation, and the political consciousness forged through revolution. When 70.8 per cent of grassroots initiatives identify peacebuilding as their primary post-war role, they are articulating what the international system has struggled to operationalise: a humanitarian response that does not end at the cessation of hostilities but carries the social infrastructure of recovery within it from the outset.

The changes proposed here are not adjustments for the next funding cycle. They are the architecture of a generational shift — a humanitarian system redesigned to serve crisis-affected communities not for this crisis alone but for the decades to come. Sudan's communities did not wait for institutional permission to respond. They mobilised within days, drawing on traditions of collective action that predate the institutions now deliberating over whether to fund them. The blueprint is here. The moment is now. What remains is the institutional will to act on it.

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