

3. Out of reach: remote and hard-to-access populations

Ensuring people can access principled impartial assistance based solely on need¹ can be extremely difficult in areas where humanitarian presence and access are limited (Haver, 2016). While it is challenging to provide assistance without presence, presence does not tell the whole story. Some assistance can be provided remotely (food drops being one common example), although quality and extent of the assistance and level of targeting may suffer. Alternately, organizations may be physically present but not have the necessary level of access or sustained access to meet the needs of the population.

This chapter therefore focuses on people who are not receiving essential humanitarian assistance because humanitarian actors (local, national or international) are not adequately present or able to provide adequate assistance to the places where they are located. These communities may be considered ‘out of reach’ or ‘hard to reach’.

Factors that render people hard to reach range from physical realities of the natural and built environment to man-made factors, such as insecurity, and regulatory barriers (see Figure 3.1). Each of these factors not only renders humanitarian presence and access more difficult and expensive, but can also pose serious challenges to providing principled humanitarian assistance impartially based on need. Access is therefore often hard-won and involves trade-offs, compromises and tough choices (Haver, 2016; Bennett et al, 2016a).

This chapter examines these factors and the steps being taken in the humanitarian sector to address them. It concludes with ideas on how the humanitarian sector can adapt in the face of the dilemmas and challenges to ensure as much as possible that people’s needs are being met, even in the hardest-to-reach communities.

1. Non-discrimination, on the basis of nationality, race, religious or political beliefs or any other difference, is a core part of the Geneva Conventions and is expressed in various legislation on human rights (see ICRC, 1979).

Fig. 3.1 Factors inhibiting presence of internationally funded humanitarian assistance



A: PHYSICAL

- physical environment – terrain, climate and lack of infrastructure



B: CONFLICT AND INSECURITY

- military operations and ongoing hostilities
- presence of mines and unexploded ordnance
- violence against humanitarian workers/assets/facilities
- obstruction of access to assistance by affected populations



C: POLITICAL AND ADMINISTRATIVE PRACTICES AND LAWS OF THE GOVERNMENT OF THE AFFECTED OR DONOR COUNTRIES:

- denial of existence of humanitarian needs
- restriction of entry of humanitarian goods or staff into country (including an absence of functional systems to facilitate the necessary processes)
- restrictions on movement within country
- interference in humanitarian activities, including influencing beneficiary and staff selection
- restrictive operational requirements, such as requiring the presence of international staff for monitoring
- restrictive and complicated legal obligations, such as counter-terrorism requirements

3.1 Remote and physically challenging locations

There is no formally accepted definition of what might be considered a ‘remote location’ in humanitarian settings but the term is generally used to indicate those places from which it would be hardest or take the longest for someone to access basic humanitarian services. Relevant factors therefore include low population density, significant distance from population centres and relevant services (such as health clinics and hospitals), lack of functioning transport links and infrastructure, as well as terrain difficulty.

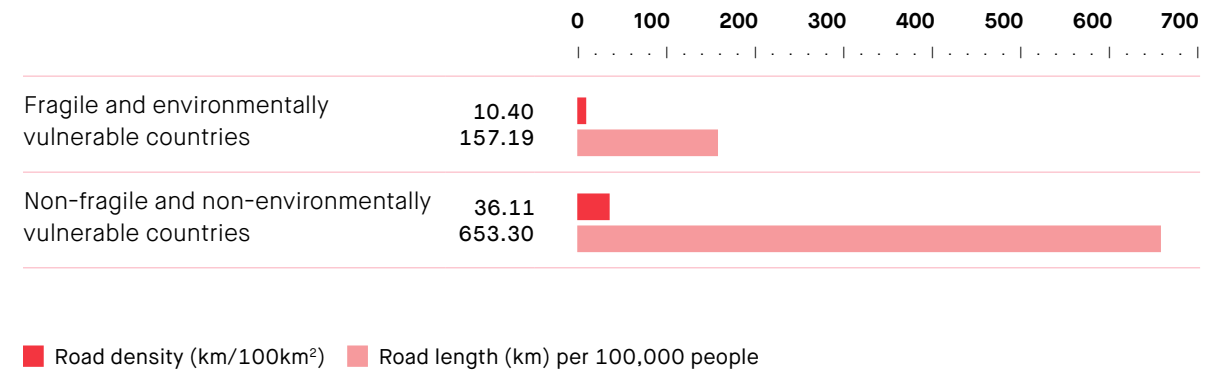
These challenges often overlap with poverty, conflict and natural hazards: infrastructure may be destroyed by protracted conflict or by events such as landslides, floods and earthquakes. Furthermore, in fragile and conflict-affected states, there may be less investment from government or donors in repairing or developing services and other infrastructure. In South Sudan, for example, heavy rains make limited road access even more difficult (South Sudan Logistics Cluster, 2018) and the lack of a functioning airstrip in certain locations can be directly linked to ongoing active conflict where investments risk being destroyed (see Figure 3.1). Similarly, humanitarians are often reluctant to preposition stocks or rebuild offices due to fear of looting and destruction (Stoddard and Jillani, 2016).

3.1.1 Challenges and impacts

Lack of infrastructure and services in remote locations

A combination of distance, challenging terrain and lack of transport can have a life-and-death impact when speed of response is critical. This is particularly so in fragile and vulnerable countries as these generally have poorer transportation infrastructure than others, with an average road length of 157km per 100,000 people; which is less than four times the average road length (653km) in countries that are not fragile or vulnerable (CIA, 2018).

Fig. 3.2 Comparing road infrastructure



Notes: Fragile and environmentally vulnerable countries are respectively defined using OECD’s *States of Fragility 2016* and the *INFORM Index for Risk Management 2018* data set. See Data notes for further details.

Sources: Based on OECD *States of Fragility 2016*; *INFORM Index (2018)*; *World Bank Population data (2018)*; *CIA World Factbook (2018)*

Similarly, communications infrastructure – from cell phone coverage to established communications and alert systems – is often lacking in remote areas and in fragile countries. In remote areas of South Sudan for example, the telecommunications infrastructure is among the least developed in the world, and traditional forms of communication, including

cattle horn blowing, drum beating, smoke signals and sending runners to neighbouring villages, remain important (REACH, 2017).

Box 3.1 Tsunami in the remote Arctic

In June 2017, a huge landslide in a fjord in Nugaatsiaq, on the west coast of Greenland, caused a 90-metre tsunami. The tsunami washed away 11 houses, caused 4 deaths and led to 3 villages being evacuated. The remoteness of the location (some 3,000km from the capital, Nuuk), sparse population and local resources, very limited road connections and difficult access for boats all rendered the response operation extremely challenging. The municipality in question has one of the largest geographical areas in the world, but very few people or resources in the area. Transport is also extremely limited, with no road connections and difficult access for boats. The Greenlandic Red Cross was following the situation from Nuuk, 3,000 km away, which posed challenges to the information flow. A timely response to the remote area was essential to save lives.

Remote communities in mountainous regions

Mountainous regions often have particularly limited infrastructure, such as in Pakistan where people may need to trek through snow to reach a road and then still travel for many hours to reach a hospital. For people living in certain mountain villages in Nepal it may be day's walk from the nearest roadhead, airstrip or major town, sometimes across 2,000 to 3,000-metre-high mountain passes. Both government and humanitarian responders struggle to provide adequate services in such remote locations. In Nepal 25% of households in the mountainous areas have to travel more than an hour to reach a health facility, while many have to travel far further. In urban areas of Nepal around 70% of births are attended by a skilled birth attendant, dropping to around 40% in rural areas (WHO, 2017b), and infant and post neonatal mortality are significantly higher in the mountainous zones (Nepal Ministry of Health, 2016).

In the aftermath of a disaster the challenge of accessing health services is exacerbated. The lack of road infrastructure and the mountainous terrain caused considerable challenges in providing assistance to earthquake-affected populations in Nepal following the 2015 earthquake (see Box 3.2).

Box 3.2 Nepal earthquake response

On 25 April 2015, a 7.9 magnitude earthquake struck Nepal between Kathmandu and Pokhara. Initial reports indicated mass casualties and extensive destruction of infrastructure and livelihoods. The Government of Nepal declared a state of emergency and called for humanitarian assistance. Some 230,000 people in areas affected by the earthquake were estimated to live in areas inaccessible by road (Logistics Cluster, 2016).

Canadian Red Cross, in partnership with Philippine Red Cross, and including delegates from Mexican Red Cross and Hong Kong Red Cross immediately deployed basic healthcare emergency response units including surgical, obstetrics and community outreach capacity, to various locations. The most remote was the northern district of Rasuwa, which reported devastation of its district hospital in Dhunche (at 2,030 metres). The roads were too dangerous to use due to landslides caused by the earthquake.

The emergency response unit kit (which is large and bulky) was therefore brought to the location via helicopter shuttles in multiple rounds and then the materials were transported from the landing site to the emergency response unit site via local labour. Its tents were in use as the service outlet of the district hospital for 32 months, until January 2018.

Remote island communities

Countries consisting of multiple remote island communities often have to deal with great distances, irregular transport and limited communications infrastructure. Kiribati for example consists of 33 atolls and islands and a total land area of around 800 square kilometres but dispersed over 5.2 million square kilometres of ocean. The outer islands are serviced by semi-regular weekly flights (often booked out weeks in advance) and an irregular boat service, making emergency visits difficult. Transport between the islands is costly and only semi-reliable: an International Federation of Red Cross and Red Crescent Societies (IFRC) emergency response team was once stranded on Arorae atoll for three weeks.

The need to rely on air transport to provide assistance in remote locations dramatically increases operating costs, and often slows the response, due to the time needed to negotiate for space on available aircraft alongside many other factors. In the aftermath of Hurricane Irma in September 2017, it took several days to make the runway on the heavily affected island of St Maarten operational again, thereby enabling some goods and aid workers to be flown in. At the same time, the air bridge organized by the Ministry of Defence was oversubscribed, as its expanded troop base limited the amount of space for relief goods. A further challenge was distributing relief supplies once they reached the island as many trucks and cars had been destroyed and everything had to be imported, including fuel.

Communication for early warning is particularly important for small island communities. The capacities of Climate Services and ability to forecast certain weather events at a regional and national level in the Pacific have significantly improved over the last decade. However, adequate communication systems are not uniformly in place to ensure the warning reaches all households and communities to enable them to take early action, particularly those that are small, remote and on small islands, though there are efforts to change this (see Box 3.3).

Remote indigenous communities

Marginalized groups, including indigenous communities and minority ethnic groups, often live in remote locations where physical isolation and social exclusion can reinforce

each other. Moreover, people who have been left behind in development terms are more likely to be left behind when there is a humanitarian crisis, even in developed countries.

For example, indigenous communities in the Canadian Arctic suffer multiple inequities, including inadequate housing (52% of Inuit live in overcrowded homes compared with 9% of the rest of the Canadian population) and food insecurity (70% of Inuit are food insecure, compared with 8% of the rest of the population). These communities also have significantly less access to health services with 30 physicians per 10,000 population in Nunavut versus 119 on average in urban areas (Inuit Tapirit Kanatami, 2017). This can lead to health crises, such as the re-emergence of tuberculosis, which spiked in 2017 in the Inuit Nunangat territories. In early 2018 Qikiqtarjuaq, a hamlet on the eastern coast of Baffin Island, Nunavut, had the highest rate of tuberculosis in the territory, with almost 10% of the population infected.

3.1.2 Emerging solutions: attempts to overcome logistical challenges in remote locations

The principal impacts on remote communities of these logistical challenges are the absence of any long-term presence to invest in infrastructure for preparedness and resilience, and a significantly reduced speed of response. Responses in physically remote locations are also much costlier given the heavy reliance on air transport and the increased human resources needed to provide timely services to multiple remote locations. Inadequate funding (as outlined in Chapter 5, Out of money) can therefore have an even greater impact on the extent and quality of the response and force difficult decisions about where and where not to respond. Humanitarian actors have taken steps to address these challenges.

Supporting local capacities so communities can support themselves

An obvious first step is to invest in community resilience so these distant communities can support themselves to the fullest extent possible. Well-organized and resourced local responders can make an enormous difference, even in the face of the most challenging hazards. For example, experienced local Uganda Red Cross Society community health workers quickly identified the presence of Marburg haemorrhagic fever (similar to Ebola) in a remote Ugandan community near the border with Kenya in 2017, raising the alert so that the handful of cases were responded to quickly and did not escalate into a major outbreak. Likewise, National Red Cross Societies in the Arctic region train volunteers for search and rescue in avalanches, glacier and water rescue and have invested in local resources, such as trailer systems for storing emergency shelter and relief equipment and a first aid programme designed for Arctic conditions.

Where the presence or capacity of local organizations to deal with crises is limited, investment in developing them is key. Remote communities can benefit from enhancing local preparedness and early warning systems as well as planning for changing health risks and livelihoods. Humanitarian actors are increasingly investing in supporting local capacities. For example, the Colombian Red Cross has been working with Wayuu indigenous communities living in the Guajira desert region in the far the north of Colombia near the Venezuelan border. Given the inadequate health facilities in the region, they focused on

developing a trained ‘emergency group’ of community volunteers to ensure first aid was available for their communities.

Box 3.3 Managing challenging access in South Sudan through supporting local capacities

The remoteness of villages in Gogrial coupled with poor road conditions (particularly in the rainy season) mean the healthcare provided there is severely limited. People have to walk for between two and three hours to reach a medical point. Given the limited health facilities, South Sudan Red Cross medical outreach teams (supported by Canadian Red Cross) use motorbikes to carry, essential equipment and supplies, and to carry out outreach activities in areas where there is no health facilities.

A key strategy to providing sustainable healthcare services is to train community members. This training includes how to identify and treat children under five for malaria, pneumonia and diarrhoea and to screen malnutrition cases and refer them to the nearest health facility. They are provided with supplies, incentives and supervised to ensure integrated community case management.

Early warning in remote communities is often essential to survival, and a key challenge is to make weather and climate information accessible and relevant to the needs of diverse users, particularly people who are socially, physically or economically isolated. To be effective, systems have to be developed with and by the community and work with the available communications infrastructure, and there have been a number of initiatives to develop appropriate early warning systems with communities, such as in the Pacific (see Box 3.4).

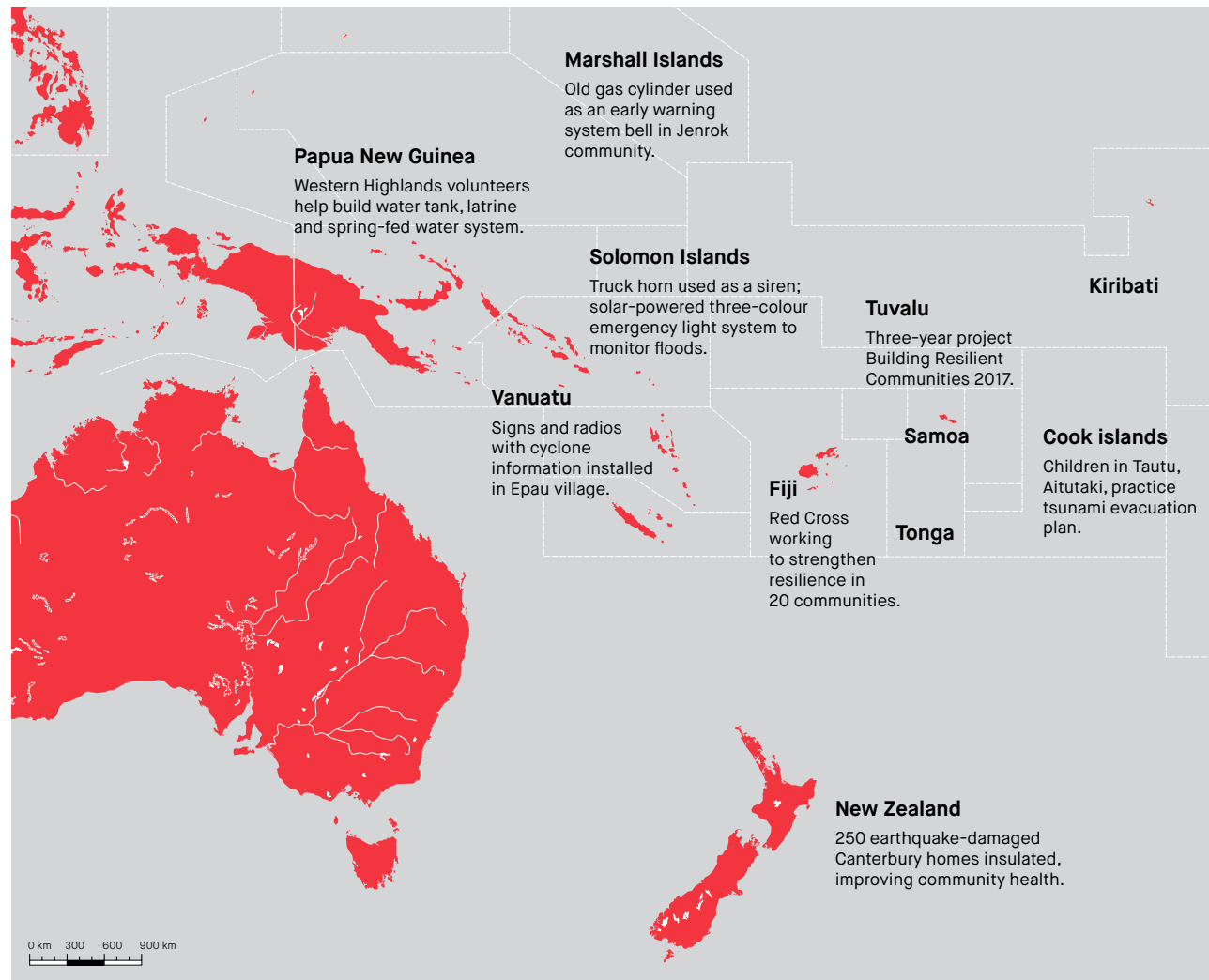
Box 3.4 Early warning systems in Pacific Island countries

Under the Finnish-Pacific Project to Reduce Vulnerability of the Pacific Island Countries’ livelihoods to the effects of climate change (FINPAC Project), National Red Cross Societies in the Pacific, with National Meteorological Services and National Disaster Management Organizations, have been listening to communities and villages in Pacific Island countries and learning how they receive, understand and interpret weather and climate information. This has formed the foundation for developing early warning systems together. Community members are playing a key role in monitoring daily weather information largely provided on local radio and social media so weather and climate information can be delivered to users – fishers, farmers and villagers on main and outer islands – who depend on weather and climate for their lives and livelihoods.

In the Solomon Islands, an archipelago of 992 islands stretching some 725,000 kilometres, participatory consultations led to a community-based early warning system that uses a truck horn as a siren and a solar-powered three-colour emergency light system to monitor floods.

Jenrok, a seaside neighbourhood on the main island of Majuro, in the Marshall Islands, is exposed to the impacts of climate change and weather related events, with king tides, floods, storm surges and a rising sea affecting many communities. Preparedness is therefore essential, and people know when they hear three rings of the bell to get their essential items together quickly and to evacuate to the high school, which is the highest and strongest building in the community.

Fig. 3.3 Map of some Pacific Island early warning systems



Investing in logistics and transport

When local capacities are overwhelmed and international support is needed, local transportation capacities are usually also insufficient. In some disaster response, national

militaries are the first line of emergency transport and logistical surge capacity. Regional mechanisms can also provide support to national response: the Association of Southeast Asian Nations (ASEAN) Committee on Disaster Management seeks to improve coordination and logistics in disaster response, developing registers of standby assets and capacities, including air and sea transport (ASEAN, 2017).

However, in conflict-affected settings these logistical challenges of reaching remote locations present more complicated problems and demand different solutions. International humanitarian responders often rely on UN agencies for logistical support, but where the UN has a lower risk threshold or is perceived as a non-neutral actor, this may not be practical (Haver, 2016). The responders most able to work in remote locations with minimal infrastructure are often people with their own aeroplanes or helicopters. This is an approach often used by ICRC and Médecins Sans Frontières (MSF) for example, which means they are able to get to more remote areas and faster while preserving their neutrality. But this is not realistic for most organizations, for which it may be more feasible to invest in shared assets with others with similar operational approaches and risk thresholds (Haver, 2016), or to develop partnerships with others with air assets. For example, the IFRC worked with Airbus Foundation to transport a mass sanitation emergency response unit provided by British Red cross to thousands of people living in a refugee camp on the border between Uganda and South Sudan (Airbus, 2017).

3.2 Insecure environments

Insecurity is the major barrier in many contexts, making certain populations extremely difficult for humanitarian service providers to reach. As noted by the UN Secretary-General: “(b)esides active hostilities, the most severe constraints included attacks against humanitarian personnel or assets and bureaucratic impediments, including movement restrictions” (UN, 2017). Armed groups may restrict populations’ access to assistance, or restrict organizations from reaching people in need and may seek to control where assistance is provided and to who. Obtaining access to insecure and conflict-affected areas often requires difficult trade-offs in terms of humanitarian principles and can undermine the quality of humanitarian response.

3.2.1 Challenges and impacts

Restrictions on presence and movement by conflicting parties

Conflicting parties preventing assistance from being provided to communities is unfortunately widespread (UN, 2018b). It is of course not a new challenge – international humanitarian law obliges parties to a conflict to ensure “rapid and unimpeded passage of all relief consignments, equipment and personnel” (Art 70 Additional Protocol 1 to the Geneva Conventions) and consent may not be arbitrarily withheld (ICRC, 2016).

Humanitarian access restrictions have severely hampered the humanitarian response in crisis contexts ranging from the blockade of ports in Yemen to the prohibition on aid convoys entering opposition held areas of Syria. The UN reported that in 2016 assistance could be delivered to just 20% of people in besieged areas in Syria due to constraints imposed by parties to the conflict (UNSG, 2017) while in 2017 it was provided to only 820,000 of the 3.32 million people living in besieged and hard-to-reach areas (UNSG, 2018).

Speed of assistance is also slowed by requirements for permits to travel to different parts of the countries in crisis, which is the case in many conflict contexts (Jackson and Zyck 2017, UNSG, 2018). Armed opposition groups may also prevent humanitarian organizations' access to provide assistance to affected populations. It is not uncommon for governments, non-state armed groups and other local actors to demand aid in specific communities in return for access, or within an area to seek to influence who is provided with aid.

Access negotiations with warring parties and indeed with any actors controlling territory and communities' access to assistance tends to involve complex negotiations, compromises and trade-offs. Governments, armed actors and community leaders will often demand aid be provided to certain communities and not to others, or may push for targeting of certain people in a community over others (Haver, 2016). There are many examples of organizations providing assistance in one area and not another or complying with specific demands to maintain their access and continue providing assistance to at least some of the people in need.

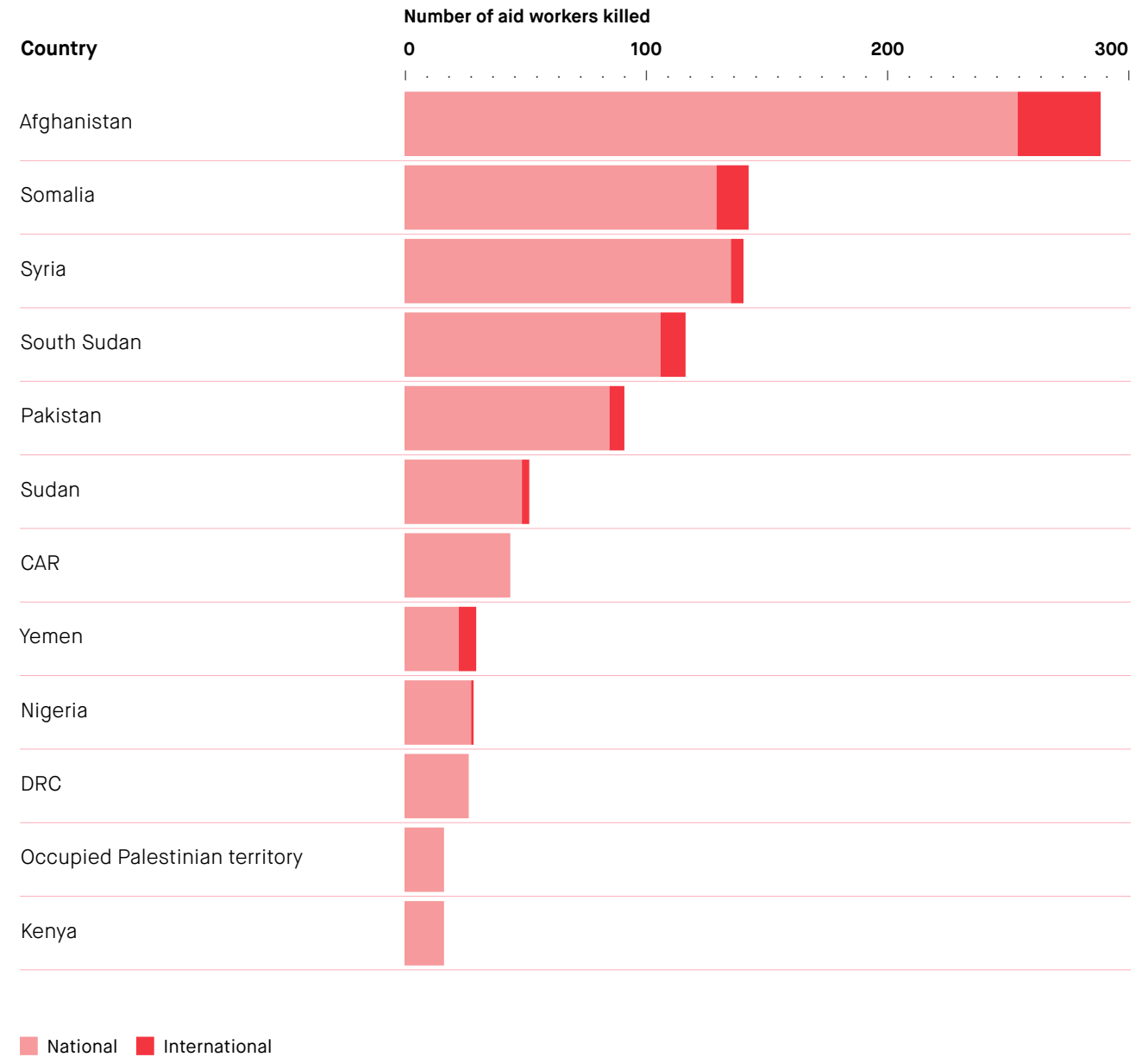
Aid worker attacks and humanitarian presence: global patterns

Conflict and insecurity evidently affect the civilian populations caught up in them at a far greater scale than they do the humanitarian workers who seek to assist them. However, in many insecure environments, aid workers are deliberately targeted or caught in the crossfire, which further constrains organizations' presence. Research looking at the period 2011 to 2014 found that countries that had no attacks on aid workers had four times the number of responding agencies than those where there had been attacks (Stoddard and Jilliani, 2016).

Fatal attacks on aid workers are on the rise. In 2017, there were 139 deaths of humanitarian workers, a 30% increase from the previous year. In the ten years before this 1,072 aid workers were killed, almost double the 557 killed the decade before (Humanitarian Outcomes, 2018). In 2017 33 National Red Cross or Red Crescent Society staff and volunteers were killed by violence in the line of duty, the highest number of staff and volunteers killed in a given year since systematic recording of such incidents began in 1994 (IFRC Security Unit, 2018, interviews).

In the last ten years, the most dangerous places for aid workers have been Afghanistan, Somalia, Syria, South Sudan, Pakistan and Sudan (Figure 3.3). Afghanistan has seen significantly more aid workers killed than any other country (Humanitarian Outcomes, 2017).

Fig. 3.4 Number of national and international aid workers killed in the 12 countries with the most incidents, 2008–2017

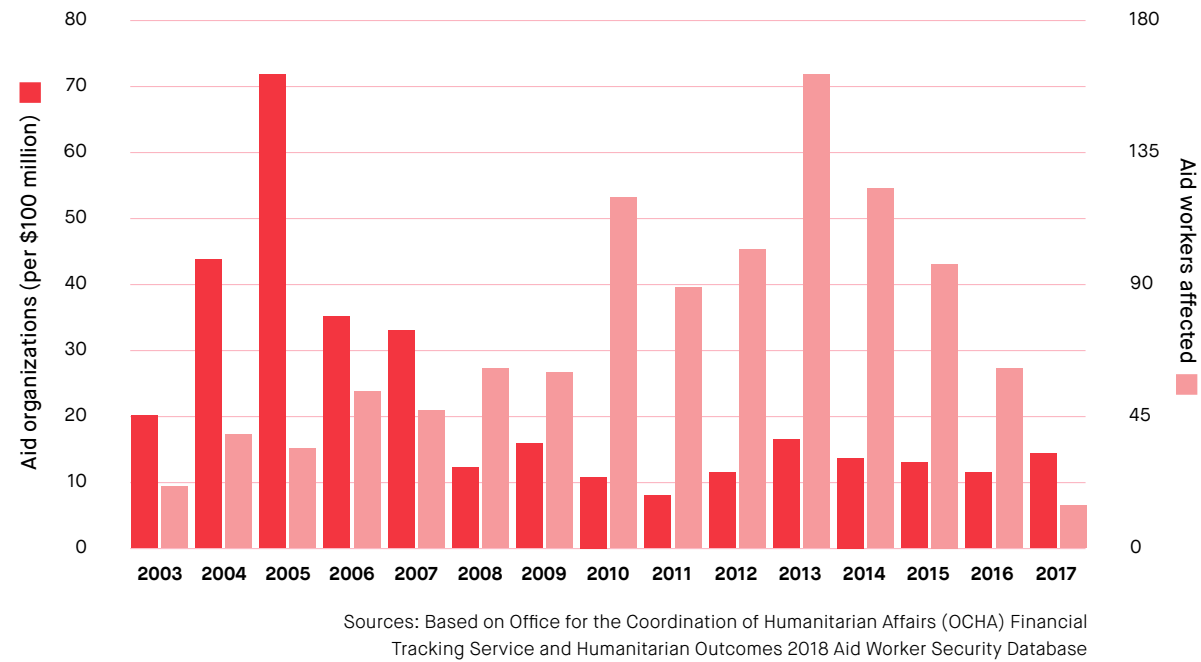


Notes: CAR: Central African Republic; DRC: Democratic Republic of the Congo.

Source: Based on Humanitarian Outcomes 2018 Aid Worker Security Database

The impact of attacks on aid workers on organizational presence at a country level is clear when mapped over time for a single country with multiple attacks. In Afghanistan as attacks on aid workers increased and became volatile, aid worker presence reduced; as attacks went down, presence increased (Figure 3.5).

Fig. 3.5 Aid organizations present and attacks on aid workers in Afghanistan 2003–2017



Impact of insecurity on presence at the local level

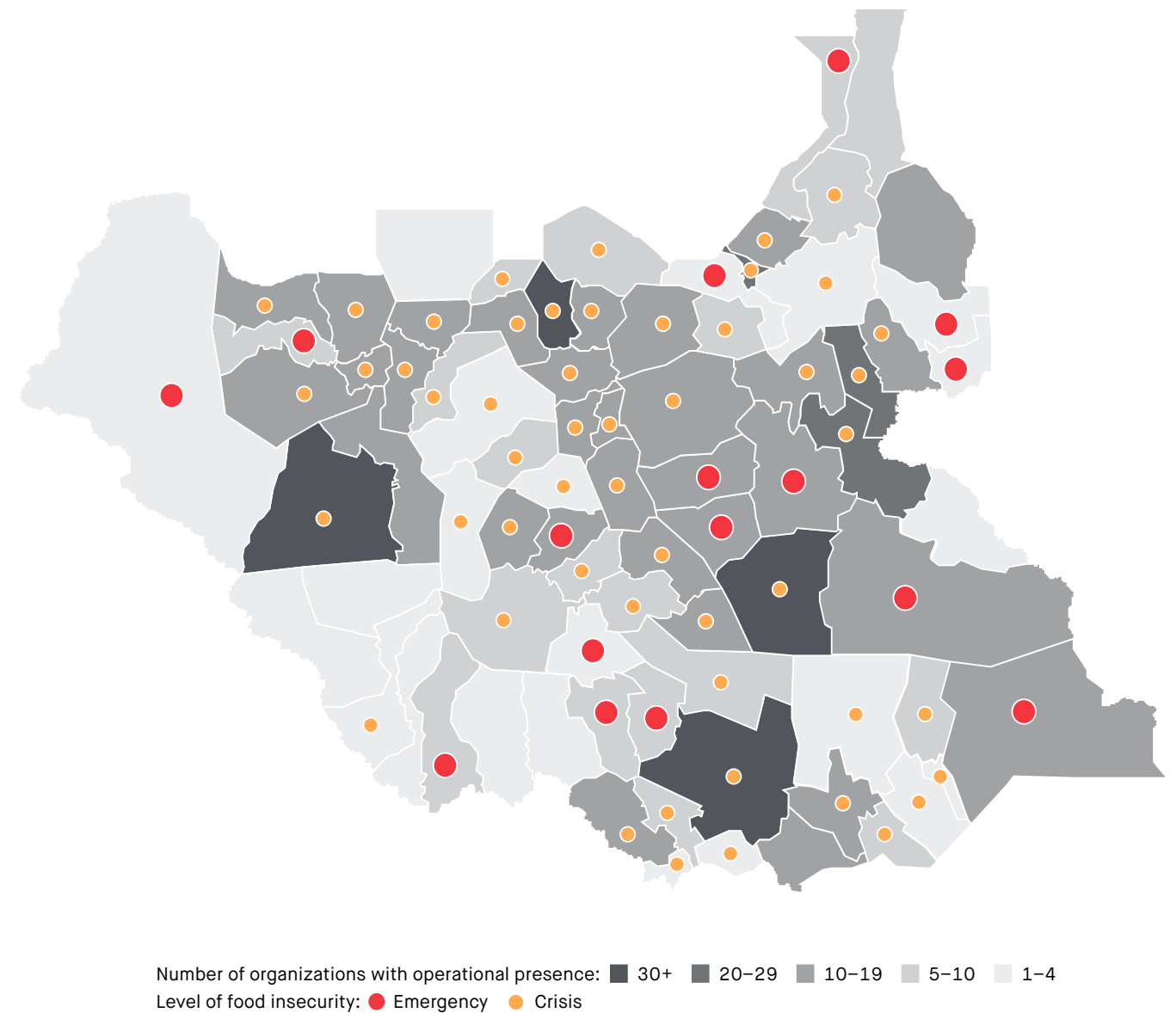
Insecurity for aid workers drives down presence of international organizations in a country, prompting difficult compromises between staff safety, maintaining operations and meeting the needs of the most vulnerable people. Organizations rarely pull out of a country entirely, but may reduce their presence and provide assistance in safer, easier-to-access areas (Svoboda and Haddad, 2017; Haver, 2016; Stoddard and Jillani, 2016). For example, there are very few countries entirely classified as red on the IFRC scale (the highest level of security risk and no permanent presence of international staff), instead there are usually red areas in a country. The IFRC also draws a clear distinction between dangerous locations where staff and volunteers can and have been hurt and killed, and locations where they have been intentionally targeted.

Insecurity can have a long-term impact on presence, as organizations “tend to remain in locations and programming modalities where they feel comfortable, and have strong disincentives to expand into the unfamiliar” (Stoddard and Jillani, 2016).

The result is often an absence of humanitarian response in the most in-need areas. A snapshot of humanitarian response in South Sudan in February 2018 (Figure 3.6) for example, shows the absence of internationally supported humanitarian actors (the number of organizations present shown by degree of shading) despite evidence of high levels of emergency needs (shown by icons, larger being more food insecure) (OCHA South Sudan, 2018). Some of the areas with lowest presence, such as Western Bahr el Ghazal in the far west of the country and Longuchok and Maiwut in the east are classified as having

emergency levels of acute food insecurity (the next phase being famine) yet have the lowest presence of aid actors.

Fig. 3.6 Needs and operational presence in South Sudan, February 2018



Notes: Food security levels based on Integrated Phase Classification of the Famine Early Warning Systems Network (FEWS NET), with famine as the most serious phase, followed by emergency, crisis, stressed and then minimal. All areas on the map not marked as crisis or emergency are categorized as 'stressed'.

Source: Based on OCHA South Sudan 3Ws and OCHA South Sudan Humanitarian Snapshot

Some organizations manage to keep providing assistance by using various tactics that differ by context. In Syria, assistance in non-government-controlled areas is mostly provided through cross-border deliveries by local and Syrian diaspora organizations. In South Sudan, the focus is on air-drops and other rapid-response mobile deliveries of assistance. In Afghanistan the approach is generally low profile and highly localized (Stoddard and Jilliani, 2016).

Where organizations do manage to maintain a presence (albeit a reduced one) in insecure areas, the range and quality of assistance may suffer as organizations are less able to deliver technically complex programming or to ensure targeted assistance to the most vulnerable people. There is a tendency to focus on types of assistance requiring limited presence (such as one-off distributions) and aid workers raise concerns of ‘dump and run’ distributions, where teams do not remain on the ground to manage a distribution – which can result in violence and vulnerable households not receiving the items they need, and can serve as a pull factor for armed groups. Organizations also tend to neglect human-resource intensive and politically sensitive activities, such as protection (Jackson and Zyck, 2017).

Some agencies are more likely than others to remain in insecure environments. These include national organizations, certain members of the International Red Cross and Red Crescent Movement (generally ICRC and the National Red Cross or Red Crescent Society of the given country), and a small number of international non-governmental organizations (INGOs) (often MSF), with a limited UN presence – usually a purely coordination role (Stoddard and Jilliani, 2016). Those who stay may have a different risk tolerance, or more effective procedures for managing risk (Tiller and Healy, 2014).

International agencies will often choose first to relocate international staff, leaving local staff or partners to run operations. Meanwhile, National Societies and other local actors do not leave because they are part of local communities, indeed they often will scale up as others depart.

3.2.2 Limited progress and difficult trade-offs

Security management

Humanitarian security risk management has become significantly more professionalized in recent years with improved global guidelines and enlarged security teams in high-risk environments (Jackson and Zyck, 2017). Collaboration has also increased – the UN Department of Safety and Security provides support on security analysis and coordination as part of the Saving Lives Together initiative, although some responders are reluctant to rely on the UN, given concerns about its conservative approach to risk.

The increased focus on security risk management has also been accompanied in many contexts by an increased investment in ‘passive’ security measures: high walls, armoured cars, sand bags, barbed wire. While equipment that facilitates safe transportation, identification of humanitarians as humanitarians and enables communications is important, there are concerns that increased “bunkerization” (Svoboda et al, 2018) can undermine initiatives to ensure acceptance.

The 2011 study *Stay and Deliver* noted some of these concerns and challenged organizations not to ask “when do we have to leave?” due to danger and insecurity, but “how do we stay when there are people in need?” (OCHA, 2011b). There appear to be some improvements since then as “UN agencies and NGOs are deployed or maintaining a sizable field presence in some highly insecure contexts... [where they] would not have done so five or ten years ago” (Jackson and Zyck, 2017).

Investment in shared information collation, analysis and advocacy

Coordination, information-sharing and collaborative analysis around security threats, incidents and access barriers have often proved challenging. In some environments, informal access working groups have been established (such as Nigeria), and in others Office of the Coordination of Humanitarian Affairs (OCHA)-managed access units have been set up (including in occupied Palestinian territory, Iraq, Syria, Somalia, Yemen and South Sudan) to collate information around security threats and bureaucratic impediments and to support collective advocacy.

The access monitoring unit in occupied Palestinian territory, supported by the UN Office for Project Services (UNOPS), UN Development Programme and OCHA, has a hotline providing real-time assistance when challenges arise, as well as facilitating visa processing and other permits. As a result, it has quite comprehensive data that can be used to support evidence-based advocacy. The team has dedicated staff with strong relations with key government and military structures, able to address issues as they arise. But this model of a well-resourced team operating in a relatively small geographic area is resource intensive and therefore challenging to replicate.

The success and longevity of these units has varied, due to levels of funding, as well as levels of trust and buy-in from humanitarian actors. Some organizations found their work very useful while others pointed to an over-reliance on others to solve access issues, instead of organizations developing their own acceptance strategies and contacts.

INGOs have developed and partnered with NGO security platforms, such as the International NGO Safety Organization (INSO), which operates in a number of humanitarian contexts, to undertake security analysis and train staff. Some collaborative national NGO initiatives have also localized research and analysis at a subnational level. Syrian NGO platforms undertaking such work include the Syrian NGO Alliance and the Syrian Relief Network (Svoboda et al, 2018), and more geographically focused collaborative research is being done by local organizations to “build a local understanding of the conflict dynamics and their humanitarian impact” (Adleh and Favier, 2017).

Working with national partners versus “remote programming”

It is common in insecure settings for programming to be delivered by local and national staff of international organizations or by local or national organizations as partners, although this varies between contexts. There has been some progress around use of third-party monitors, communication with communities directly via phone or internet and other technological solutions to enhance accountability (Jackson and Zyck, 2017).

The shift to working through local implementing partners is not solely about managing insecurity. In most humanitarian contexts international organizations work with and through implementing partners and it is important to recognize that local, national and diaspora organizations can and do often provide effective coverage, meeting humanitarian needs in challenging contexts such as Syria and Somalia.

Approaches vary widely: in some circumstances decisions are made entirely away from the field location (classic ‘remote programming’), while in others more decision-making is delegated to local staff or partners (Svoboda et al, 2018). However, the extent of aid provision by local partners increases dramatically in insecure situations and the degree of oversight becomes substantially more limited.

Box 3.5 Accessing hard-to-reach areas in Afghanistan – the role of the Afghan Red Crescent Society

The Afghan Red Crescent Society has better access in the hard-to-reach areas of Afghanistan than many other responders, with wide acceptance and presence in almost every province.

According to the humanitarian response plan, “[t]he Red Crescent and Red Cross Societies are critical enablers in providing humanitarian assistance in large parts of the country which no other partners can access” (OCHA Afghanistan, 2018). While it reaches places no one else can, it too has access barriers in certain districts controlled by armed opposition groups. The society, like any organization, does not want to put its staff and volunteers in danger.

Afghan Red Crescent Society takes a community-based approach to obtain access. Its approach to polio vaccination campaigns, for example, is to recruit local women as nurses and midwives so that women and children will be comfortable (and permitted) to go to health centres. At the same time there is significant attention to security – a security coordinator dedicated to the routine immunization area and a dedicated security person as part of the polio project.

The society has a memorandum of understanding with the Afghanistan Ministry of Public Health to provide healthcare in areas where government cannot provide or guarantee the services. In the areas where government access is shrinking, others rely increasingly on the society to fill the gap. Afghan Red Crescent Society often experiences pressure from UN agencies and the government to be the implementing partner in underserved areas. As one member of field staff said: “everyone expects [the Afghan Red Crescent Society] to be the delivery agent in hard-to-reach areas as there is a perception that they can go where others aren’t”.

Transferring risk to national actors

When security risks are transferred to local staff and volunteers and local organizations it is assumed they are less at risk than their international counterparts (Thomas et al, 2018).

Local organizations, including those active in Central African Republic, Afghanistan and Syria have noted that “international actors routinely discounted their security needs and that, reliant on international support, these local organizations were reluctant to press the issue and demand greater funding for security” (Jackson and Zyck 2017).

The approach of working through national staff and national organizations simply transfers the risk down the chain – from UN to INGO, from INGO international staff to INGO national staff, from INGO to national NGO (Haver, 2016). In fact, while kidnapping attempts often target internationals (largely due to the ability to raise greater money from ransoms), far more nationals are kidnapped every year and the vast majority of aid worker deaths are nationals – almost 90% (Humanitarian Outcomes, 2018). But this transfer of risk is not always accompanied by a transfer of the capacities to manage that risk (Reilly, 2018).

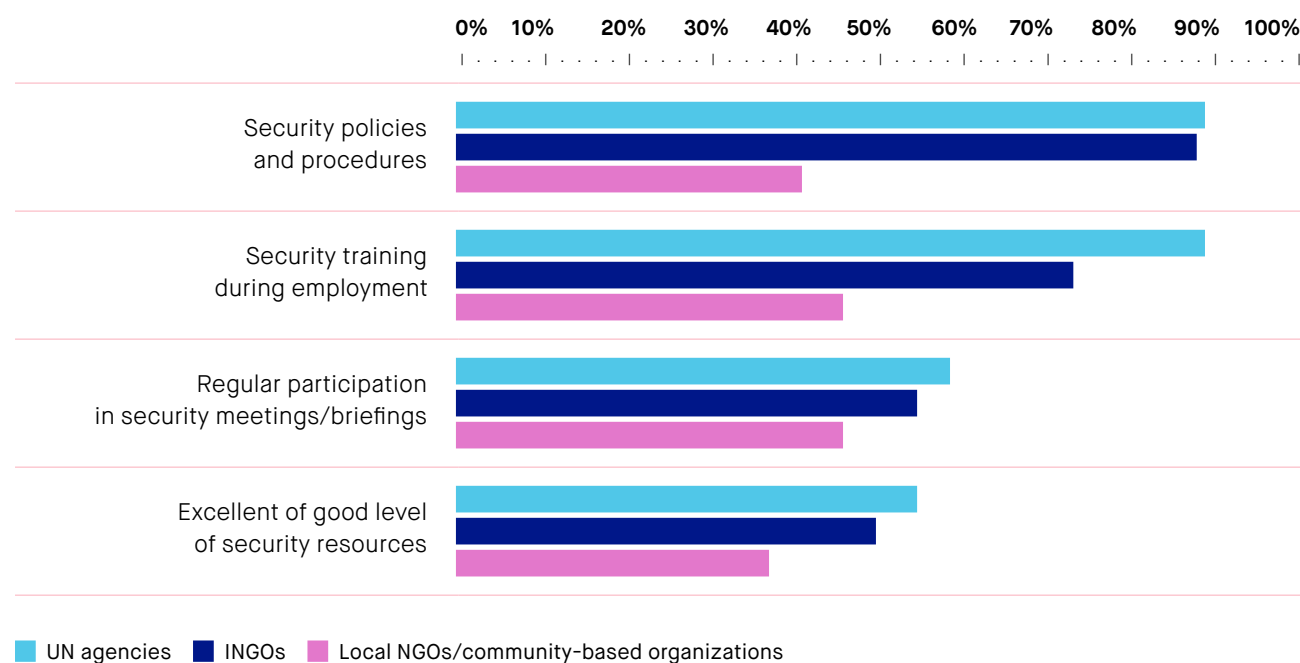
There is evidence of continued gaps in risk mitigation measures of international organizations for national staff, such as an absence of evacuation procedures, communications equipment, transport out of hours, security at their homes (Stoddard et al, 2017b) and psychosocial care following traumatic experiences (Jackson and Zyck 2017). The disparity is even greater with local organizations that often have less resources to manage security challenges, less training and less access to key security-related hardware, and international organizations consistently fail to provide local partners with “systematic support (financial, security training, insurance, capacity-building)” (Svoboda et al, 2018).

“There were no lights at night and none on our boat. We reached near the general’s quarters. An order was given to shoot us. They were putting search lights on us and because of the reflection tapes on my uniform, they saw us and stopped the order... So what we need is transportation and communication. Since we don’t have any communication devices our lives could be in danger. And since our boat does not have a light, our flag could not be seen.”

EXPERIENCE OF A NATIONAL VOLUNTEER, LOCATION NOT SPECIFIED
(AGERHEM AND BAILLIE SMITH, 2017)

In the past, national organizations were not involved and were rarely invited to attend security training exercises offered to UN and INGO staff (OCHA, 2011b). While this is gradually changing, local NGO staff remain the least likely to have received security training from their organizations (Jackson and Zyck 2017). INSO notes that interest from local and national organizations in receiving support to managing security risks is growing, including requests to hold trainings on security management. INSO has provided some of this support and in mid-2018 around 20% of INSO partners were national NGOs (INSO, 2018, interviews). ICRC and the IFRC similarly provide training to National Societies on the Safer Access Framework. Yet training can only have a limited impact without the human resources to implement the necessary systems at an institutional level, which may be more important than the training (Jackson and Zyck, 2017).

Fig. 3.7 Levels of security support to staff, by organization type



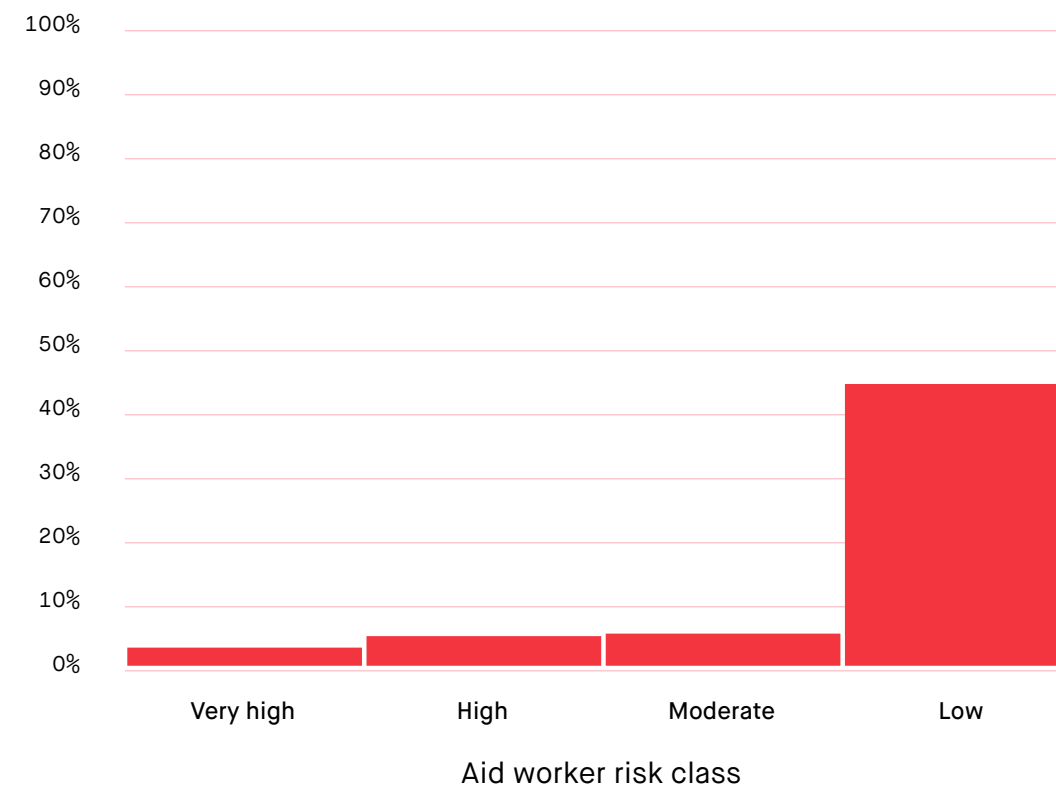
Source: Jackson and Zyck, 2017

Another issue is insurance – the staff of local and national organizations who may be the most likely to be injured or killed while providing humanitarian assistance are also the least likely to be insured. While some local organizations (in particular Syrian local and diaspora NGOs) have advocated for medical insurance for staff and compensation for families of people injured or killed, few partnership agreements with international organizations include insurance or support to cover medical expenses or salaries to families of people killed or unable to work (Jackson and Zyck, 2017). As a result, local organizations often try to cover these from their own funds (Svoboda et al, 2018).

The IFRC recognizes this challenge, and the IFRC Volunteering Policy reinforces the National Society commitment to volunteer protection, including “insuring their volunteers against accidents, and providing them with appropriate psychosocial support when required”. To implement this commitment, The IFRC has developed a scheme to provide inexpensive insurance to national society volunteers at a cost of around 1.50 CHF (1.5 US dollars²) per volunteer per year, providing basic cover in the case of accident, death or disability.

Despite this, in 2016, National Societies in only 13 out of the 20 most-dangerous countries (65%) reported that they provided accident insurance to at least some of their volunteers (though 4 National Societies in the list did not report). Others had managed to negotiate access to government insurance schemes (such as in Colombia) but these were a minority, demonstrating there is a long way to go.

Fig. 3.8 Insurance rates of volunteers for National Red Cross or Red Crescent Societies in locations with different levels of security risks, 2016



Source: Based on Humanitarian Outcomes 2018 Aid Worker Security Database and IFRC Federation-wide Databank and Reporting System

2. Currency conversion as of 31 July 2018 using xe.com.

This issue of security capacities and insurance raises a fundamental question of ethical, if not legal, duty of care that needs to be addressed (OCHA, 2011b). Investment in the human resources and capacities, systems, hardware and infrastructure and insurance for local and national partners and national staff is essential.

Negotiations and compromises in achieving principled assistance

Achieving truly impartial provision of aid based solely on need is extremely difficult in areas where access is limited due to insecurity (Haver, 2016, Haver and Carter, 2016). Indeed, “humanitarian principles often sit uneasily with the reality of crisis situations and require trade-offs in their use” (Bennett et al 2016a). This is particularly the case where there are significant imbalances in coverage, as noted earlier (Stoddard and Jillani, 2016), and where it is only possible to provide assistance in certain communities and not others. Hence the key questions become what type of compromises are organizations willing to make and where are their red lines? (Svoboda et al, 2017).

There is increased investment in training and professionalization for access negotiations, with organizations developing guidelines and protocols. For example, the Centre of Competence on Humanitarian Negotiations provides training to various humanitarian actors. While training and specialized skills are useful, negotiating access is often a constant part of action at the most local level and therefore involves many more staff than there are trained experts. Similarly, while joint initiatives can be beneficial, most organizations insist on the importance of “direct bilateral contact” (Haver, 2016).

Access negotiations and initiatives can happen at many levels, including bilaterally with governments and senior figures in armed groups, and through the UN Security Council, such as its resolution 2401 (2018) calling for a 30-day cessation of hostilities in Syria to enable deliveries of humanitarian assistance and medical evacuations of the critically sick and wounded. Security Council resolutions are not required for access, given clear obligations under international humanitarian law, but can in theory be a useful tool. However, even where there is higher-level permission, experience shows that without local compliance this will not enable access.

Organizations present in hard-to-reach areas are painfully aware of the compromises needed to stay and deliver assistance and will make deliberate choices that may compromise certain principles in support of the overarching principle of humanity (although they may not always do this well or based on a sound analysis of the implications and trade-offs) (Niland, 2014).

These issues are challenging for both international and local actors: “Essentially, parties to the conflicts... hold the upper hand in deciding, indeed dictating, the rules that will apply to humanitarian access, the consequences of which will have similar effects on organizations regardless of their provenance” (Svoboda et al, 2016). However, local organizations have different strategies to address these challenges (ibid). Tactics may include adding programme areas at the request of different groups to maintain access to the areas with highest need, or otherwise meeting demands so long as they are also able to continue to meet identified needs (Haver and Carter, 2016). Working with a diverse range of local actors with presence at the community level may help in some situations to ensure broader geographical presence.

Prioritizing hard-to-reach areas

It is important to maintain a strong focus on reaching people most in need and delivering assistance accordingly based on needs and vulnerability regardless of access constraints, rather than on delivering operations in the easiest-to-reach areas. And organizations with the most success at getting to the hardest-to-reach people despite insecurity are those that explicitly adopt this strategic approach (ibid).

There have been efforts to incentivize programming in the hardest-to-reach but most in-need locations under the auspices of the OCHA-managed country-based pooled funds. For example, in 2017 the Afghanistan Common Humanitarian Fund allocated funds to carry out assessments in the hardest-to-reach provinces, supported mapping of basic services in these areas and prioritized projects in hard-to-reach districts identified as having urgent humanitarian needs (OCHA Afghanistan, 2017a). According to the Afghanistan Humanitarian Response Plan this has “encouraged partners to operate outside their comfort zones and explore all possible avenues to reaching the most vulnerable people rather than falling back on areas where they already enjoy access and needs exist, but are not the most acute” (OCHA Afghanistan, 2017b).

A similar approach was adopted in Syria with the Syrian Humanitarian Fund committing to allocating 30% of its resources to assisting people in hard-to-reach and besieged areas (OCHA Syria, 2017).

3.3 Political, administrative and legal barriers

Political, administrative and legal factors may limit the presence and effectiveness of humanitarian responders, and their ability to provide principled humanitarian assistance. Organizations often need to consider not only risks to staff and programmes in a given context, but the impacts in other contexts. This is particularly challenging where there may be tensions in providing impartial humanitarian assistance in contexts with onerous national government and/or donor legal requirements.

3.3.1 Challenges and impacts

Bureaucratic hurdles and limited capacities of national governments to coordinate and manage a response

National authorities often face challenges coordinating and managing an international response to major disasters. This was evidenced when thousands of small (and often new) organizations endeavoured to support the response to the 2010 Haiti Earthquake, and in the inundation of inappropriate material to Vanuatu following Tropical Cyclone Pam (see Box 3.6).

There are stories of food supplies going rotten as they wait for customs clearance and weeks of delay for visas for staff to enter the country. In non-conflict settings, bottlenecks may be the unintended result of inflexible legal frameworks and a lack of capacity to manage incoming assistance. Vital international relief is often delayed due to bottlenecks in customs procedures, such as delays in importing relief items such as food, transport and communications equipment or tax of certain items deemed to be luxurious. These challenges may be exacerbated by humanitarian responders who do not coordinate with authorities, may be supply driven rather than needs driven and who do not always comply with (or know about) basic national law or humanitarian standards.

An IFRC survey examined some of the challenges impacting on international relief in the context of disasters. The most common issues raised by survey respondents were about coordination, in particular between international and domestic responders, and among domestic agencies on how to manage international assistance. Survey participants cited other frequent and highest-impact regulatory problems as: difficulty in obtaining customs clearance or exemptions from duties, taxes or costs; delays or restrictions in the entry of relief workers; difficulty in accessing information on customs and other border-crossing procedures; and failure of international responders to adequately consult with affected people about decisions (IFRC, 2015c).

Box 3.6 Vanuatu administrative challenges in disaster response and the need for clear processes and legal frameworks

In March 2015, Vanuatu was hit by one of the most intense cyclone in the Pacific's recorded history – Tropical Cyclone Pam, affecting over half of the population, flattening homes and schools and displacing some 65,000 people.

The government issued its first-ever generalized appeal for international assistance, and scores of international organizations, INGOs and bilateral partners flooded into the country to support the response. Vanuatu received over 70 containers of unsolicited bilateral donations including nearly expired cans of food, high-heeled shoes, heavy blankets, expired medicine, handbags and woollen knitwear and other items inappropriate for the context, overwhelming the government's warehousing and sorting capacity. Coordination proved challenging among the humanitarian sector and with the national authorities and the Vanuatu Government temporarily halted all aid distributions.

In May 2017, the response to Tropical Cyclone Donna went more smoothly as policies and procedures for international assistance had been developed and implemented (IFRC, 2017f). Requests and provisions of international technical assistance were much more specific and coordinated. The government was in direct communication with partners to request specific technical skills. Donors were more closely engaged and responded to needs communicated from the government based on information provided through its coordination mechanisms.

Donor programming and contractual requirements

Especially in the wake of recent scandals, donors are focusing increasingly on humanitarian organizations' accountability, in particular their measures to prevent fraud, corruption, sexual exploitation and abuse. As donor requirements become increasingly specific, expensive and elaborate, small local organizations often struggle to keep pace. Their difficulties in quickly meeting the standards designed for large Western bureaucracies reduce the range of partners with which donors and intermediary organizations can partner. This can prove a problem in locations where there are already very few organizations present and it may therefore not be possible to find principled experienced partners who can undertake the work.

Some INGOs have raised concerns that donors are increasingly transferring risk to them rather than sharing the risks (Stoddard et al, 2016b), including the risks of working with new partners. For example, some donors require monitoring of programme implementation (often by local partners) by international staff, even in situations where this is contrary to security rules and programmes have been cancelled or closed for this reason. Donor field staff tend to recognize the challenges, but are at the same time unable or unwilling to share the risks for non-compliance as such decisions are taken elsewhere (ibid).

Criminalization of assistance and reducing humanitarian space

Deliberate limitations on humanitarian space are not restricted to conflict zones. This is shown by the increased measures restricting provision of assistance to migrants, in particular in Europe. For example, in March 2017, the mayor of Calais banned "repeated, prolonged gatherings" around the site of the former Calais 'Jungle' camp, making food distributions illegal, in a bid to prevent the camp being re-established (Guardian, 2017). Meanwhile the 'Stop Soros Act package' in Hungary criminalizes certain activities aimed at assisting asylum seekers and irregular migrants, including providing legal aid, and levies an additional tax on activities that support migration.

Similar developments include the increasing opposition to humanitarian search and rescue operations in the Mediterranean. There have been incidents with Libyan border control (Zandonini, 2017) and the European border agency Frontex, which accused NGOs of colluding with smugglers and in doing so endangering lives (The Conversation, 2017). The Italian government subsequently proposed a Code of Conduct for those undertaking search and rescue in the Mediterranean, announcing that failing to abide could lead to the refusal to authorize migrants to disembark in Italian ports. This code limits activities in Libyan waters, sparking NGO concerns that it severely hampers their operational effectiveness and impartiality (Cusumano, 2017). UN High Commissioner for Refugees (UNHCR) also raised concerns that the denials of permission to disembark people rescued, such as the incident in June 2018 when Italy turned away the Aquarius (operated by the French NGO SOS Méditerranée), is further reducing the presence of search and rescue capacities (UNHCR, 2018a).

Counter-terrorism laws and dealing with listed groups

Many governments have adopted legislation and associated measures aimed at combating terrorist activities and seeking to limit the financial support to designated ‘terrorist’ entities, and implemented sanctions regimes. The relevant prohibitions generally focus on financial or material support to listed groups, extended even to include training on human rights law, as noted in the 2010 US Supreme Court case *Holder v Humanitarian Law Project*. Paying ‘taxes’ and diverting assistance risks breaching these laws. It is even more challenging when the group in question is also de facto government of the area, running schools and hospitals, such as in Gaza.

Some donors have also implemented vetting requirements – for staff, partners and sometimes for affected people. These slow response and can undermine the impartiality and perceived neutrality of humanitarian assistance, and further impact on security and access (NRC, 2018b). Organizations that accept funding from donors with such requirements are also often perceived not to be neutral (Burinske and Modirzadeh, 2017). Some donors have advised grant recipients that they should not engage with members of designated groups, and similar requirements are specified in some national laws. Some humanitarians have therefore curtailed their direct contact with listed groups, severely hampering potential access negotiations and acceptance strategies (Mackintosh and Duplat, 2013; NRC, 2018b).

Impacts have ranged from substantial delays in initiating emergency operations (for example, awaiting approval for programmes in high-risk areas, such as Syria, and long vetting processes) to shutting particular programmes. For example US commodity-based sanctions against the Syrian government substantially slowed importation into the country of essential items that facilitate humanitarian assistance, as many need specific clearance from the US Bureau of Industry and Security (NRC, 2018b).

Fears of inadvertent breach of such legal requirements have been reported to have a “chilling effect”, discouraging programming in areas under the control of listed groups (Burinske and Modirzadeh, 2017; Mackintosh and Duplat, 2013; Haver, 2016). Some humanitarian organizations have adopted “self-imposed limitations on where they operate... to prevent any potential violations of counter-terrorism laws” (Svoboda and Haddad, 2017). The effects of these regulations have been felt on operations in Afghanistan, Mali, Somalia, Iraq, Syria and occupied Palestinian territory, among others (Jackson and Zyck, 2017). The potential impact of this if sufficiently widespread, is that communities living in areas controlled by listed groups will not have access to the assistance that they need (NRC, 2018b).

Bank de-risking

Use of banking systems is particularly challenging in contexts with listed terrorist groups. International banks have blocked or delayed fund transfers or closed accounts from international humanitarian organizations, impacting on humanitarian relief operations. For example, research in Yemen, Syria, Somalia and occupied Palestinian territory has shown that bank de-risking (closing bank accounts or preventing transfers to customers deemed to have a high risk of funding terrorism or money laundering) has not only caused problems for the business sector, impacting generally on the economy and undermining the potential for post-conflict reconstruction. But it has also significantly delayed and prevented transfers from European and US-based humanitarian organizations to Yemeni

organizations involved in providing vital humanitarian assistance to populations in need. This not only delays provision of assistance and payment of staff salaries but also limits availability of cash assistance as a key tool in a context with high insecurity and access challenges (El Taraboulsi-McCarthy and Cimatti, 2018).

Humanitarian organizations are therefore forced to use alternative, less secure methods, such as carrying significant amounts of cash across borders (Burinske and Modirzadeh, 2017; NRC, 2018b). This increases the risks of working in certain areas, raises concerns around transparency and accountability and can lead to significant delays to programming. The Norwegian Refugee Council (NRC) notes that “unless a solution to this issue is found, banks will dictate where humanitarian organisations can work” (NRC, 2018b).

3.3.2 Emerging solutions: attempts to address administrative and legal barriers

Clearer regulatory frameworks

From a more systemic and preventative angle, efforts to put in place domestic laws that comply with the Guidelines for the domestic facilitation and regulation of international disaster response and initial recovery assistance (the International Disaster Response Law (IDRL) guidelines) can go some way to mitigating potential bureaucratic impediments, and promoting a more coordinated and efficient response. Since the IDRL guidelines were internationally adopted in 2007, more than 30 countries have adopted new national laws, rules and procedures to avoid regulatory problems in disasters and to facilitate international assistance being provided following disasters (IFRC, 2017b).

For example, during the 2017 earthquake in Ecuador, work by the Ecuadorian Red Cross and national authorities to assess and ensure the country’s preparedness around IDRL enabled the granting of priority landing to flights carrying humanitarian aid by the Director of Civil Aviation. It also enabled the swift adoption of a regulation allowing selected international humanitarian NGOs that were not previously registered in Ecuador to operate and provide humanitarian assistance during the response (IFRC, 2017b).

In terms of maintaining space for providing assistance impartially, there have been some limited advocacy successes. One example is the Global Compact on Safe, Regular and Orderly Migration, still in draft form at the time of writing, which includes (non-binding) state commitments to ensure that principled humanitarian assistance is not criminalized.

Organizational risk management and donor partnership requirements

Organizations that can afford it are investing significantly in ensuring accountability and managing legal and other risks through hiring legal and audit compliance staff, training staff regularly, and developing and implementing new policies. Of course, as noted already, this can be more challenging for smaller organizations and local actors with low coverage for overhead and core costs.

Harmonized requirements across donors can help make this task much easier. Some Inter-Agency Standing Committee members have therefore proposed that donors adopt (or adapt collectively) common policies around integrity and accountability issues, rather than each developing their own policy requirements. An example is provisions on prevention of sexual exploitation and abuse outlined in the Core Humanitarian Standard.

There are also initiatives to mitigate blockages around sharing risk across the levels of the humanitarian financing chain. The Start Fund has developed a model to address this issue with a national NGO pass-through window, which aims to incentivize Start Network members to “provide a risk management service on behalf of local NGOs, with the option for mentoring and support services at the discretion of the local NGO... Members underwrite risk through subcontracting agreements. A significant percentage of pre-existing relationships have enough experience and trust that no additional due diligence would be required by the INGO” (Patel and Van Brabant, 2017).

Promoting an approach to counter-terrorism that does not undermine principled humanitarian assistance

There are various efforts underway to engage donors around the more problematic impacts of various donor policies where they undermine impartial provision of assistance, in particular those related to counter-terrorism, with mixed success.

For example, the concept of ‘humanitarian exemptions’ to terrorist-financing regulations and sanctions regimes is often raised. Language has been included in UN Security Council resolutions on sanctions, such as in the Somali and Eritrea sanctions regime established by resolution 1916 (2010) whereby “the payment of funds, other financial assets or economic resources necessary to ensure the timely delivery of urgently needed humanitarian assistance in Somalia... will not result in an asset freeze”. Similarly, the EU directive on combating terrorism exempts from its scope “humanitarian activities provided by impartial humanitarian organizations recognized by international law” (UNSG, 2018).

At the national level, advocacy initiatives have pushed for new laws elaborating a ‘humanitarian exemption’ in US counter-terrorism laws, beyond the current limited exemption for medicine and religious materials (King et al, 2016).

There has also been ongoing engagement with donors to clarify the obligations for humanitarian actors and increased support for organizations to understand and manage these legal obligations, including the NRC’s Risk Management Toolkit in relation to Counterterrorism Measures.

3.4 Within reach: conclusions and recommendations

The logistical challenges described in this chapter – from remoteness to transport gaps and extreme environments – are, and will continue to be, daunting for an overstretched humanitarian sector. If anything, the man-made barriers, ranging from deliberate violence against aid workers, to inadequate investment in infrastructure in marginalized and impoverished communities, to restrictive regulatory environments, can be even more challenging to address. These challenges are often symptomatic of wider political failings – from failed conflict resolution, to restrictions on civil society space, to inadequate investment in infrastructure in marginalized and impoverished communities.

While bringing everyone within reach and removing such obstacles entirely may not be possible without political solutions to build peace and social inclusion, humanitarian organizations and donors can take some practical steps towards improving access. These include: investing in local capacities; addressing administrative barriers; removing donor disincentives and barriers to working in hard-to-reach areas; and prioritizing and incentivizing improved coverage in hardest-to-reach communities.

Many concerted and creative efforts are underway and guidelines and agreements exist. States and components of the ICRC agreed in 2011 to “remove administrative barriers to the rapid delivery of humanitarian assistance for victims of armed conflicts”, including through enacting domestic legislation (ICRC, 2011b). There have been significant developments in laws and policies to implement the IDRL guidelines, but more remains to be done.

3.4.1 Investing to support reaching the most vulnerable people

- **Donors and international humanitarian organizations should review financing policies and practices which can act as disincentives to accessing the people who are hardest to reach.**

Earmarking and results-based frameworks can restrict agile responses to evolving needs and priorities on the ground. Initiatives that support presence in difficult environments – such as investing in security management, transport, communications and visibility capabilities and staff insurance – should be considered core to project budgets, not dispensable overheads, and funded flexibly.

Reporting frameworks should also not disincentivize or penalize attempts to access hard-to-reach populations – recognizing, for example, that fewer people may be reached per dollar in such contexts and adopting realistic and adaptable performance indicators.

At the same time, humanitarian organizations need to be more vocal and straightforward about the impacts of donor laws and policies and more forthcoming in working together to develop solutions that meet donors’ underlying concerns.

- **Donors should consider funding that promotes programming that reaches the people most in need, even if they are the hardest to reach**, such as that delivered under the auspices of certain pooled funds. For example, in 2017, Afghanistan’s Common Humanitarian Fund – the OCHA-managed country based pooled fund – allocated resources to assessing, and basic service mapping in, the hardest-to-reach provinces, and then provided assistance in the districts identified as having the most urgent humanitarian needs. Such initiatives support the humanitarian principle of delivering based on need, wherever it is found, rather than targeting people in less risky, easier-to-reach areas.

3.4.2 Ensuring regulations promote rather than impede access

- **Governments and financial institutions should re-examine current counter-terrorism laws and their application in situations facing humanitarian crises.** Various efforts are underway to mitigate the problematic impacts of policies that undermine impartial provision of assistance, in particular those related to counter-terrorism, and these must continue. For example, the EU directive on combating terrorism exempts “humanitarian activities provided by impartial humanitarian organizations recognized by international law” from its scope (UNSG, 2018). Financial institutions, humanitarian actors and relevant government departments need to work together to identify ways to limit the impacts of bank de-risking policies in situations facing humanitarian crises.
- **National governments should review legal and administrative frameworks to remove the types of barriers that impede service delivery in hard-to-reach areas.** Well-designed national legal and administrative frameworks can simultaneously reduce unnecessary barriers to incoming relief and ensure that domestic officials are leading the overall coordination of aid. Positive experiences in countries such as Indonesia, Philippines and Ecuador are positively influencing other countries to take the necessary steps toward reform. National Red Cross or Red Crescent Societies have been active in over 100 countries to support their authorities in this way. However, achieving such reforms in all countries will require time, patience and consistent encouragement from the humanitarian sector.

3.4.3 Prioritizing programming and presence according to need

- **Humanitarian organizations need to work together to ensure up-to date accurate information on presence and capacities, coverage of needs and gaps and specific access constraints.** Analysis should include inputs from communities as to the presence of functioning assistance providers and whether their needs are being met. Identifying local community capacities should also be part of this process, not only those responders supported by international funding.
- **Humanitarian organizations and donors need to prioritize filling gaps in assistance to the communities that are most neglected and hardest to reach.** This requires

setting objectives around reaching the people who are hardest to reach and constantly reassessing programming in hard-to-reach areas, as well as a transparent analysis of needs and gaps.

- **International organizations need to invest in the people most able to be present and to provide services in the hardest-to-reach areas, including local actors and communities themselves.** Major donors and humanitarian agencies have already committed to substantially increasing their investment in local capacities, most notably in the 2016 Grand Bargain. Making good on this commitment will be critical for extending relief in hard-to-reach areas, particularly in times of crisis. This means mapping the capacities that exist, investing early in sustainable local capacities and providing better support to national partners with a local presence before crises hit. Local responders, like all humanitarians, can and should be expected to have adequate safeguarding and accountability procedures in place, but these requirements should be realistic and calibrated to real (as opposed to perceived) risks. Supporting local organizations to be able to meet donor requirements, and where possible to be pre-approved as partners, also means they can receive funding and scale up much more quickly in a crisis.
- **International organizations should see their responsibilities as extending beyond their own staff to their local and national partners.** This requires investment in areas identified by local partners including specialist negotiation training; security management; the implementation of security systems and procedures; transport, communications and visibility equipment; and staff insurance. Solutions must be found, either through a more generous approach to overheads or dedicated funding for security measures.



Bangladesh, 2018

An early walk in the campfire haze at Kutupalong camp, Cox's Bazar, Bangladesh. People with disabilities face huge challenges in the camps.

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