

UNPACKING LOCALISATION

A DISCOURSE ANALYSIS OF ECHO'S LOCALISATION AGENDA
IN YEMEN AND ITS LOCAL PERCEPTIONS



Image source: [The New Humanitarian | The humanitarian Grand Bargain 2.0](#)

MASTER's THESIS

Nouman Abdulaziz

Supervised by: Steffen Bo Jensen

Number of Characters: 101.291

Global Refugee Studies

Autumn 2025

AALBORG UNIVERSITY

Abstract

In a field where the term *localisation* is being more and more used and contested, this thesis seeks to uncover the underlying mechanisms of the commitments taken during the Grand Bargain and carried on from 2016 until today. Starting with an outlook on current debates, problematising the notion of the *local* and advocating for new approaches, a deductive approach leads to the formulation of two working hypotheses that ultimately aim at discussing the following research question: *How and to what extent does localisation in humanitarian aid function as a means of risk transfer rather than genuine empowerment of local actors?*

Drawing on Faircloughian Critical Discourse Analysis (CDA), the linguistic, discursive and societal practices enacted by DG ECHO -as an international donor- and Yemen -as a *local actor*-, provide a case study to investigate how risk and empowerment are discursively constructed. Identifying three indicators, inspired by recent reports on localisation, allows the research to centre around the following discursive themes: (1) framing of risk and responsibility, (2) operational and strategic involvement of local actors, and (3) financial autonomy and compliance mechanisms.

The findings reveal how, while acknowledging different risk exposures, ECHO's discourse primarily employs a cold, technical language while examining risk transfer and risk sharing practices, notably lacking a definition of different risks. Secondly, due to ECHO's institutional positioning and their discursive hierarchy, local actors are predominantly represented as implementors, carrying operational responsibilities, rather than being given strategic powers. This is further reinforced by the framing of financial autonomy and funding controls, where tightly earmarked funding and compliance mechanisms are used as gatekeepers, preventing *locals* from complete autonomy. Nevertheless, a co-constructed discursive dependency is highlighted, as Yemeni partners reproduce exclusionary frameworks by adopting an "us versus them" narrative.

Ultimately, the hypotheses are refined based on the findings and constitute the main contribution of this thesis. Importantly, the lack of a thorough conceptualisation of risk leads to its depoliticisation, and consequent framing of potentially related problems as technical issues to be solved, rather than recognising their political roots, and thereby acting on the inequalities they reproduce. On dependence, on the other hand, the study finds that Yemenis relationally co-construct it with internationals, thereby expanding Roepstorff's notion of *critical localism* to

include both parties. Methodologically, it applies discursive attention to an area where otherwise mostly operational patterns are investigated, thereby calling for a politicisation of language that ultimately decolonises localisation practices, before shifting to operational reforms.

While providing insights into the discursive path, and connecting linguistic practices with the wider social environment they take place in, CDA leaves the operational reality aside. As a last note, indeed, this study encourages further research within the same area, but with different methods - focusing more on potentially capturing informal practices and narratives through ethnographic work or qualitative interviews, thereby advancing both the generalisability of the findings, and filling the *loose coupling* between the official representations analysed here, and the operational realities in the field.

TABLE OF CONTENTS

Abstract.....	2
1. Introduction.....	5
2. Research Design.....	7
2.1 Critical Discourse Analysis (CDA).....	9
2.2 Hypotheses formulation and conceptual framework.....	11
2.2.1 Indicators.....	13
2.3 Empirical Data Collection.....	15
2.3.1 DG ECHO.....	16
2.3.2 Yemen.....	17
3. Analysis.....	19
3.1 Introduction to Analytical Approach.....	19
3.2 Indicators.....	20
3.2.1 Indicator 1: Framing of Risk and Responsibility.....	20
Risk as a Discursive Construct.....	20
The Ambiguity of Risk Sharing.....	22
Mutual Trust on Unequal Grounds.....	23
Final Considerations on Risk Transfer.....	25
3.2.2 Indicator 2: Agency of Local Actors: Operational vs Strategic Involvement.....	26
Institutional Positioning & Discursive Hierarchy.....	26
Local and National Actors: diversifying funding and responsibilities.....	27
Cost-Bearing and Capacity Building.....	30
Final Considerations on Local Agency.....	32
3.2.3 Indicator 3: Financial Autonomy and Control Mechanisms.....	33
Operational Feasibility and Funding Control.....	33
Compliance as Strategic Gatekeeping.....	34
Conditional Autonomy.....	35
Final Considerations on Funding Mechanisms.....	36
4. Hypotheses Testing and Revising.....	37
4.1 Synthesis of Indicator 1.....	37
4.2 Synthesis of Indicator 2.....	38
4.3 Synthesis of Indicator 3.....	38
4.4 Revising the hypotheses.....	39
5. Limitations & Further Research.....	40
6. Conclusion.....	42
Bibliography.....	44

1. Introduction

Localisation has become a central pillar of contemporary humanitarian policy, often defined as a strategy to shift power and decision-making processes from international actors to local authorities by recognising their leadership, strengthening the local capacity and better equipping them to address present and future humanitarian challenges (Roepstorff, 2019). The Grand Bargain, a commitment taken during the World Humanitarian Summit in 2016, reaffirmed this global position by promoting direct funding and greater autonomy for local humanitarian responders (Robillard et al., 2021). It aimed to improve aid effectiveness and increase direct support to *local actors* while addressing inefficiencies by shifting resources from overhead costs to frontline delivery, ensuring that at least 25% of humanitarian funding is allocated to local and national responders “as directly as possible” (JIPS, 2019). Moreover, the localisation agenda is said to promote greater inclusion of affected populations in decision-making, improve leadership roles for so-called *local actors*, and increase multi-year collaborative planning and funding, contributing to a major power shift in international relations.

Despite the vigorous conversations, the localisation agenda is facing several challenges, both logistically and ideologically. Challenges in practical implementation are highlighted by Dissanayake (2024), who underlines how today’s localisation efforts are considerably lower than those undertaken 20 years ago by international donors, particularly from the European Union. On a more holistic level, scholars like Roepstorff (2019) argue that international organisations continue to control funding flows and decision-making structures, limiting true empowerment of local actors. This hypothesis is well shared by De Geoffroy & Grunewald (2017), who highlight that risk transfer remains a critical issue, as the so-called *local actors* are expected to take on operational responsibilities without sufficient financial autonomy or security protections, while they face significantly greater security risks than international organisations, as they often operate in areas inaccessible to INGOs. Furthermore, in conflict situations, international organisations are typically the first to evacuate, leaving local responders to manage crises alone, without adequate resources or protection. According to the authors, this unequal burden creates a sense of injustice, as local actors are expected to assume greater responsibilities while receiving less support.

An argument highlighted in Egeland et al. (2011) is that this arguably unequal treatment does not necessarily represent unethical practices by international organisations, but often stems

from specific assumptions. Some examples include assumptions about the nature of *local* operations, which are believed to be better apt to operate in dangerous contexts as they would not be recognised as visibly foreign (p. 43). In addition, the assumption that *local* actors can be supported by their families and communities is also widespread, leading international actors to believe that *locals* may not require additional security or psychological support (p. 40). The author points out how these assumptions often stem from inadequate threat and risk assessments, ultimately resulting in a reduced *duty of care* by international organisations towards their national staff. Indeed, local NGO personnel generally receive less security support from their organisations, even when working under partnership agreements with international entities (p. 40). This is because the *duty of care* from international organisations towards their employees does not formally apply to local partner organisations, as it does to an international organisation's own national staff. According to Egeland et al. (2011), this worsens security conditions and increases the responsibilities of local NGOs in program implementation, raising critical ethical concerns that international organisations must address.

Nevertheless, frameworks have been created to overcome these challenges, and success stories about localisation mainly centre around the sharing of risk, rather than its transfer. The ICRC (2022) paper *Risk Sharing in Practice* highlights how positive examples of risk sharing mainly emerge around safety and security risks, where the importance of shared needs assessments is underlined as an essential feature of successful practices. Operational risk sharing also provides a considerable portion of the positive evaluation within the report, and a proactive approach is strongly advised against a reactive one, especially when concerning back and intermediary donors. Showing flexibility to compliance mechanisms has been shown to be beneficial for local actors and allows for a more successful localisation process, where upfront investments are less of a burden for locals (p. 23).

What emerges so far from these discussions is therefore the dual nature of localisation. On one side, the process is indeed designed as beneficial and empowering for local communities, aiming to shift power and decision-making to locals. However, on the practical level, localisation does not seem as easy to implement as it sounds on paper, proving that several challenges still need to be overcome in order to achieve proper equality. Burdens still seem to be carried unequally, and assumptions on security concerns are still widespread among international actors. These tensions are exactly what this thesis aims to unpack, investigating the

extent to which these claims in current literature can be applied to the selected case study, rather than taking a fixed point of departure based on strict theoretical grounds and perceptions.

Scholars like Roepstorff (2019) have tried overcoming the tensions outlined by proposing new frameworks of understanding, calling for a more nuanced approach to the definition of *local* and the implementation of humanitarian responses. Further discussing the importance of security support, she critiques the risk transfer dynamic in localisation policies, arguing that while international actors engage with local organisations through subcontracting, remote management, or partnerships, they often shift financial security and operational risks to their local counterparts without providing adequate resources or decision-making power (p. 292).

What seems to come out of these debates is the difference in viewpoints when looking at what localisation means, whether it is a simple process of transferring responsibilities or rather a site where structural power dynamics take shape to drive risk and financial flows. Balancing the initial aim with practical constraints brings international organisations to face challenges worth looking at, as they might change the very configuration of humanitarian responses. Building on these considerations and reflecting broader critiques of humanitarianism, according to which local actors bear the burdens of crises while international organisations retain control over funding and strategy, this study seeks to analyse the nature of the localisation agenda, specifically investigating notions of risk transfer and narratives of empowerment. More explicitly, these current debates will provide the point of departure for the study to explore the following research question: *How and to what extent does localisation in humanitarian aid function as a means of risk transfer rather than genuine empowerment of local actors?*

2. Research Design

Taking the above-mentioned scholarly discussions as a departure point, the study is structured as an exploratory research rather than an explanatory one, in line with a deductive methodological approach reasoning “from the general to the particular” (Pellissier, 2008, p. 3). Built around two hypotheses, which will be outlined below, this deductive approach will provide the space to pragmatically investigate localisation by focusing on its documented challenges and testing them through three selected indicators. Allegedly, testing the hypotheses with measurable indicators will prevent the research from academic bias and help investigate the initial premises based on logical reasoning. In line with the Chicago School’s interpretation of

deduction, this study recognises the deductive process as *complete thinking* (Bryant & Charmaz, 2019), which allows an open approach to hypothesis testing “for the purposes of ‘confirming, refuting and modifying’ them” (p. 12).

Moreover, given the outlined importance of perception about the meaning of localisation, and more specifically of the linguistic element, this study employs discourse analysis as the primary method of investigation, aiming to uncover discursive practices of both funding organisations and receiving actors. More specifically, Fairclough’s Critical Discourse Analysis will be utilised to analyse policy documents from the European funding institution DG ECHO towards programs in Yemen, while its reception in the country, southwest of the Arabian Peninsula, will be analysed as a counterpoint. Rather than aiming for empirical generalisability, the purpose of this single case study design is to enable a focused, in-depth analysis of how localisation is discursively constructed in policy documents and received at the field level. As Flyvbjerg (2006) argues, strategically chosen cases allow researchers to uncover mechanisms that are otherwise obscured in broader comparative studies. A single-case approach facilitates a more transparent, critical interrogation of the gaps between normative commitments to localisation and the structural logics that shape its implementation. While the specifics about case selection will be discussed later, a mention to the helpful nature of single case study analysis will be raised in the following paragraph.

A single case study forces to reflect on the investigator’s positionality, as they have no control over the data they are interpreting, but rather can only observe reality as it happens (Yin, 2009). More than that, a case study research inevitably has a broader focus on the contextual environment that surrounds the given case, a feature which goes along with the theoretical and methodological angle chosen in this study, namely Fairclough’s CDA, where the context plays a pivotal part in understanding discursive practices. For this specific research, the case chosen has been a representative/typical case (Yin, 2009, p. 48), where ECHO and Yemen embody a representation of commonplace situations in the humanitarian field, and are taken as informative examples for the humanitarian institutional context, and its reception in the field.

To clarify the deductive standpoint, the following sections will (1) provide an introduction to Fairclough’s Critical Discourse Analysis, (2) expand the research question to formulate the two hypotheses, and, lastly, (3) present the selected case studies, underlining their correlation to the general theme of the study.

2.1 Critical Discourse Analysis (CDA)

Given the pivotal emphasis on meaning negotiation and interpretation that permeates localisation debates, this study is inspired by Fairclough's Critical Discourse Analysis (CDA) as its principal methodological framework. CDA provides a structured approach to understanding how language practices construct and maintain social power relations, making it an appropriate methodology for examining humanitarian policy discourse. However, the method does not come without limitations: its strong emphasis on interpretation makes the study far from being a mirror of objective reality. Notably, Fairclough claims that critical research, and CDA specifically, cannot be understood as politically neutral but are rather deeply committed to social change (in Jørgensen & Philips, 2002, p. 64). Rather than adopting his model to openly criticise the political landscape, however, the focus is put on utilising the three-dimensional model to uncover mechanisms that would not be possible to uncover without Fairclough's approach to CDA. More specifically, the study will analyse the threefold nature of discourse, in line with Fairclough's thought, focusing on the "analysis of (spoken or written) language texts, analysis of discourse practice (processes of text production, distribution and consumption) and analysis of discursive events as instances of sociocultural practice" (1995, p. 2).

Fairclough conceptualises discourse in dual terms—both constitutive and constituted—suggesting that while discourse shapes social structures, it is also shaped by them (Jørgensen & Phillips, 2002). He therefore points to the importance of social and political forces in shaping discursive practices and to how these never happen in a social vacuum. Moreover, Fairclough's model provides a methodological advantage by linking textual features and discursive patterns with social practices, showing how power relations shape what is considered legitimate humanitarian discourse. Indeed, doing discourse analysis following Fairclough's model means focusing on the three-dimensional structure of discourse, where lexical choices are explored in close collaboration with discursive practices and broader social trends.

Adopting Fairclough's CDA three-dimensional model, this study focuses on 1. textual features (micro-level), 2. discursive practices (meso-level) and 3. social practices (macro-level) at different times of analysis, investigating all three levels when deemed necessary. As the author himself allowed, not all levels have to be used while doing research within the CDA framework, and "the research design should be tailored to match the special characteristics of the project" (Jørgensen & Phillips, 2002, p. 76). More specifically, the research seeks to uncover how

localisation, empowerment, and risk are framed in policy documents through vocabulary, and sentence structures, consequently examining the production and interpretation of policy discourse from both sides, namely how international actors define and control localisation commitments and how these are perceived by local partners, as well as exploring how policy language connects to larger power structures in humanitarian governance and whether it reinforces or challenges current North-South disparities.

This approach allows for a thorough investigation of the linguistic choices adopted by DG ECHO in their policy documents and ultimately, helps to reveal power hierarchies embedded in the localisation discourse, shifting the attention from a plain linguistic level to a more extensive social and political one, where discourse becomes not only socially and historically situated, but also a form of action capable of conveying ideologies that “contribute to the creation and reproduction of unequal power relations between social groups” (Jørgensen & Philips, 2002, p. 63). Indeed, Fairclough’s view of discourse is tightly connected to Gramsci’s concept of hegemony, whereby “orders of discourse can be seen as one domain of potential cultural hegemony, with dominant groups struggling to assert and maintain particular structuring within and between them” (1995b, in Jørgensen & Phillips, 2002, p. 74). The scholar mentions the stabilising function of dominant discourses, underlining how power relations are intrinsically connected to how influential and ground-setting a discourse is, as it is influential powers who control productivity and creativity in discourse practices (Fairclough, 1995, p. 2)

This perspective is crucial for this study as it allows for an investigation into hegemonic ideologies potentially embedded within the localisation discourse, allowing space for critical questioning of how localisation policies are framed and investigating the hidden power struggles that determine who has access to decision-making spaces and whose voices are legitimised or excluded. Uncovering concepts such as the apparent democratisation of discourse, the scholar points out how power structures can subtly change the perception of social structures through the use of discourse, channelling social perceptions into supporting the hegemonic project (Fairclough, 1995, p. 79-80).

He points to the importance of interdiscursivity—the articulation of different discourses within a communicative event, and how this can signal either the reproduction of dominant social orders or the potential for discursive change (Fairclough, 1995b, in Jørgensen & Phillips, 2002). In the context of localisation policies, this allows for an understanding of policy documents not in isolation but rather as part of an intertextual chain in which past

humanitarian discourses shape present policy language. In the specific context of this study, thus, the selection of policy documents in a CDA analysis will account for their intertextual positioning—how they borrow from or silence alternative discourses within the broader humanitarian field.

2.2 Hypotheses formulation and conceptual framework

As mentioned above, the study adopts a deductive approach of analysis and thereby stands on previously formulated hypotheses, which will then be tested through analysis and revised accordingly. Based on the initial considerations made at the very beginning of this study, two hypotheses are formulated as an expansion of current debates, mainly focusing on the problematisation of the *local*, as this emerges to be one of the major themes of discussion. Much like the colonial constructed binary of the “developed” North and the “underdeveloped” South (Chakrabarty, 2000, in McEwan, 2018), a humanitarian/development discourse focusing on “local” and “international” might end up reproducing and reinforcing centuries-old self/other distinctions.

Local is indeed highly contextual as its definition is not neutral or fixed but rather shaped through policy discourse and institutional framing, raising questions about who is considered local, by whom, and for what purposes. The term seems to have a very controversial nature and seemingly contributes to further postcolonial narratives in humanitarian work. In line with the linguistic emphasis in postcolonial studies, it is indeed of pivotal importance to consider the significance of representation and discourse in shaping interventions in both colonial and postcolonial contexts. This research stands, therefore, on a postcolonial ground of analysis and will use the term *local*, recognising its controversial nature, in the absence of a more neutral and comprehensive language within development and humanitarian interventions.

As Roepstorff (2019) also argues, the distinction between *local* and *international* is not just descriptive but discursively constructed, contributing to blind spots and systemic exclusion within humanitarian governance. Indeed, what is usually labelled *as local efforts*—such as the work of volunteers, national actors, and civil society organisations— is often far from being a limited, circumscribed and new phenomenon, as this category is always at the forefront of responses. Their contributions, however, are rarely acknowledged or documented as primary and essential. Instead, *locals* are often systematically marginalised and portrayed as dependent on international aid rather than self-sufficient or sustainable (Roepstorff, 2019). This narrative from the North

might, as Roepstorff claims, contribute to reinforcing cultural hierarchies rather than dismantling them. By neglecting the importance of local actions, Northern actors frame the South as backwards and in need of salvation, positioning their involvement as a moral duty rather than a partnership based on solidarity and commonality (McEwan, 2018).

Rather than pointing towards a path of empowerment, therefore, what seems to come out from current debates is the stressed importance of sustained power hierarchies and power asymmetries. This is especially visible in the framing of risk transfer, one of the main challenges of the localisation agenda. The Norwegian Refugee Council defines risk transfer as “[t]he shifting of risk from one organisation or group onto another” (NRC, 2020), pointing to how this process can occur between donors and humanitarian organisations, between international organisations and local implementing partners, and between headquarters and field-based staff - with very different power configurations. However, as mentioned earlier, successful stories related to risk sharing, although rare, drive innovation in the humanitarian field. Distributing risk among organisations and shaping risk response strategies as a shared responsibility rather than a simple transfer has been seen to fill the gap between international organisations and the potential additional burden on national and local organisations (ICRC, 2024, p. 19).

From an international perspective, security and risk management are pivotal to the humanitarian work, especially within the localisation agenda, as managing risks both on an international level and on a local one lays the ground to an equitable partnership where power asymmetries are levelled out by shared responsibility. Discussions on risk transfer lead to the understanding that successful risk transfer, however, is not possible without comprehensive internal risk management, namely the “process to help staff systemically think through what risks may arise in specific contexts and what can be done to mitigate these” (NRC, 2020). A shared framework is encouraged, and in recent years, risk sharing has been preferred over simple risk transfer to tackle “multi-faceted [risk in humanitarian aid], spanning safety and security, fiduciary and legal compliance issues, operational challenges, data and information security, and ethical and reputational threats” (Pellowska & Fipp, 2024, p. 4). Risk sharing advocates for a framework aiming to improve risk management within delivery chains worldwide by sharing the risk burden among different actors rather than simply transferring associated risks. This, naturally, comes with new challenges and requires a dismantling of existing power balances to create more equitable partnerships based on mutual dialogue rather than unilateral relationships between donors and receivers (Risk Sharing Platform, 2023).

As these considerations have pointed out, risk is a highly debated concept among practitioners, and constant changes are being applied to improve its management. It is within this complex framework that this study situates itself, aiming to uncover hidden mechanisms behind risk transfer and NGO dialogues of empowerment, or more specifically the process “involving those who are outside of decision-making structures, maximising available opportunities, and reducing restrictions that prevent access” (Jo Rowlands, 1995, 1997, in Moreno and Duque, 2021, p. 11). In the context of localisation, this raises critical questions: Are policies genuinely empowering local actors, or are they shaped by Northern definitions of what is "fair" and "ethical", thereby marginalising local understandings of governance and social organisation? By asking these questions, the research seeks to deductively investigate whether and to what extent the localisation agenda reinforces rather than overcomes existing power imbalances through the management of risk and discourse of empowerment. Important to note that applying postcolonial frameworks does not necessarily disregard the positive effects of the localisation processes; rather, it seeks to uncover their tensions and contradictions in order to contribute to the improvement of multilateral relationships and partnerships.

Stemming from these considerations and following Roepstorff’s debates, the following hypotheses are therefore proposed:

- **H1:** *Localisation policies function as mechanisms of risk transfer from international to local actors.*
- **H2:** *Rather than enabling empowerment, localisation reinforces existing power asymmetries by decentralising operational responsibilities without shifting financial autonomy or decision-making power.*

2.2.1 Indicators

To test the hypotheses, this study adopts a discursive analytical framework applied to both DG ECHO’s policy documents and the Yemeni context as represented in secondary literature and partnership documentation. Three interrelated indicators are formulated to investigate the hypotheses, each aimed at exposing specific discursive mechanisms. These are based on the emerging localisation indicators from the *Localisation in Practice* (Van Brabant & Patel, 2018) report, in an effort to expand and further investigate previous work on the subject. The indicators are centred around the seven dimensions of localisation, namely funding, partnerships, capacity participation, coordination mechanisms, visibility and policy (Van Brabant & Patel, 2018, p. 27).

Firstly, the revised order suggested by the report puts relationship quality in the first place, advocating for respectful and equitable relationships, with reciprocal transparency and accountability (p. 27). To talk about this, given the pivotal importance of risk framing outlined before in tackling security concerns, and therefore promoting mutual respect among partners, the first indicator is framed as follows: *(1) Framing of risk and responsibility*.

Secondly, the report underlines the necessity of focusing on participation revolution, namely promoting a deeper engagement of the affected population within the strategic frameworks, allowing them to have an early say in design and planning phases, as well as making feedback mechanisms available to regularly test the response mechanisms (p. 31). Emerging from these considerations, and looking at local participation as an empowering agency for local actors, therefore, the second indicator for this study will be: *(2) Agency of Local Actors: Operational vs Strategic Involvement*.

Lastly, the third most important indicator outlined in the report concerns the funding mechanisms, ensuring both quality and quantity, overcoming the 25% commitment of the Grand Bargain with an equal focus on the quality of the collaborative relationship. Therefore, the third indicator will observe: *(3) Financial autonomy and compliance mechanisms*.

These indicators serve not only as heuristic tools but also as diagnostic instruments to assess the extent to which localisation discourses in these documents promote structural transformation or function to stabilise existing hierarchies. Each indicator captures a different facet of discursive power, offering a cumulative picture of how localisation is constructed. To follow a specific description of each indicator will be provided, as well as an outline of the rationale behind the choices of each indicator.

1. Directly addressing H1, indicator 1 has been chosen as a specific site to investigate how discourse contributes to shaping, constructing and moralising risk. By analysing the framing of risk and the specific language associated with it, this indicator aims to uncover the rhetorical strategies surrounding the concept and ultimately investigate the extent to which localisation narratives transfer accountability while maintaining control. It critically analyses the discursive framing of responsibility sharing by exploring risk distribution among funding institutions and receiving partners. More specifically, a categorisation of risks will be employed to differentiate between diverse responsibilities,

connecting in this way different degrees of exposures to the distribution of threats, ultimately aiming to uncover the potential influence of veiled power relations.

2. This indicator helps us to explore H2 by investigating local involvement and interrogating how key terms such as *empowerment*, *capacity*, and *partnership* are constructed within policy texts. Particular attention will be paid to how language delineates the boundaries of authority—whether local actors are positioned as strategic agents with genuine decision-making power or as operational implementers working under external oversight. Indicators 2 pays attention to how roles and responsibilities are distributed (e.g., strategic versus operational tasks), and whether empowerment is articulated as a rhetorical commitment or formalised through institutional mechanisms.
3. Shifting the focus to a more strictly operational level, the structuring of compliance mechanisms and the extent of financial autonomy will be explored by the third indicator. This will speak to the H2, relating financial autonomy to decisional power, and ultimately investigating relations of dependence among the actors at hand. Moreover, by centring economic interests, the very structure of humanitarian work comes under a critical lens. Indeed, by linking operational realities within financing mechanisms to the discourse of capacity building, this indicator directly refers to what Roepstorff terms the “call for a structural change” (2019, p. 291), addressing dependency and ultimately speaking to postcolonial concerns.

By analysing both discursive constructions and contractual mechanisms, this study aims to uncover the extent to which localisation reforms represent a substantive shift in power, whether they reproduce existing hierarchies under the guise of participatory reform, or whether a new middle approach can be reached by both partners.

2.3 Empirical Data Collection

The choice of primary case study for this study fell on DG ECHO, as an international donor and Yemen, as a local partner. Specifically, these cases have been chosen as they represent theoretically illustrative sites that make visible the underlying dynamics of power, risk, and discourse embedded in the localisation agenda. DG ECHO, as a major humanitarian donor with substantial influence on policy and funding flows, offers a critical site to examine how localisation is articulated at the institutional level—particularly through language, accountability structures, and funding mechanisms. Yemen, on the other hand, functions as a highly instructive

context for observing how these donor policies are received and operationalised in a setting of protracted conflict.

2.3.1 DG ECHO

DG ECHO, the European Civil Protection and Humanitarian Aid Operations, is the European Commission's leading actor in humanitarian aid and crisis management. Created in 1992, it is grounded in the principles outlined in international humanitarian law and advocates for the complementarity of civil protection and humanitarian aid (About Us, 2025). Being one of the major signatories of the Grand Bargain in 2016, DG ECHO represents a critical site for analysing how localisation is institutionally articulated. As one of the largest humanitarian donors globally, DG ECHO has substantial influence over how localisation is framed through funding conditionalities, compliance structures, and strategic guidelines (European Commission, 2023).

Its prominence in supporting initiatives such as the Start Fund, the “first multi-donor pooled fund managed exclusively by NGOs” (European Commission, 2023, p. 5), and diaspora coordination platforms, as well as extensive references to major localisation commitments such as the Grand Bargain, positions it as a norm-producing actor in the humanitarian system (European Commission, 2023). However, DG ECHO provides an interesting case as it has been reported not to meet the target for multi-year funding and multi-year planning set in the Grand Bargain (Development Initiatives, 2024, p. 19). Indeed, in 2023, only 13% of its funding went to such initiatives, out of the 30% agreed upon in the Grand Bargain. In a world with an increasingly developing number of protracted crises, this can be seen as a shortcoming of the organisation, not being able to meet today's needs.

By focusing on DG ECHO, the study can therefore critically interrogate the translation of high-level commitments into operational realities. More than that, DG ECHO's policies offer a rich site for analysing how localisation is not only supported but also constrained within institutional discourse—providing insights into how the mechanisms of power impact the discourse around localisation. The focus on discourse allows, moreover, for a deep investigation of how language is used to construct meaning, thereby adopting or rejecting current configurations of power in global humanitarian actions.

The discursive attention for DG ECHO will be placed on the following policy documents: The Guidance Note on *Promoting Equitable Partnerships with Local Responders in Humanitarian Settings* (European Commission, 2023) and the *Humanitarian Implementation Plan (HIP) for Yemen* (European Commission, 2025a). Specifically, these have been chosen as they provide the most recent developments of the localisation agenda within DG ECHO's commitments.

2.3.2 Yemen

Yemen, on the other hand, offers a particularly revealing context for observing the operationalisation of localisation policies on the ground. As one of the world's most severe and protracted humanitarian crises, Yemen presents a setting where international access is limited, needs are overwhelming, and local actors are both highly active and highly constrained (ICVA, 2023). Since 2015, the collapse of public institutions, ongoing conflict, and economic devastation have necessitated the increasing involvement of national NGOs in delivering humanitarian assistance (ICVA, 2023). However, studies have pointed to the challenges for international NGOs operating in the Yemeni context, advocating for the need for further involvement with the local community to foster meaningful partnerships and navigate fragmented governance networks (see Elayah & Al-Mansori, 2024 and Almaweri and Al-Awami, 2025).

Specifically regarding DG ECHO's involvement, the country is classified 8/10 on the INFORM Risk Index, ranking third in the world, preceded only by Somalia and South Sudan (DRMKCa, 2025). Despite not being the most at-risk environment, this case has been specifically chosen due to its partially institutionally recognised institutional governance, which, unlike Somalia's clan-based system, or South Sudan's transitional state apparatus, makes it easier to access from international organisations like DG ECHO. Moreover, Yemen is the one country of the three to get the most allocated funds from DG ECHO for 2025: with 80.000.000€ compared to 70.000.000€ for South Sudan and only 36.000.000€ for Somalia (European Commission, 2025b).

The localising process in the country had many actors during the years, starting from the Yemen Humanitarian Response Plan (YHRP) articulated in 2021, where commitments to protect the social and human capital of the country were made, emphasising capacity building and inter-agency coordination (Al Sakaaf et al., 2024). In 2022, the Yemen Humanitarian Fund

(YHF) framed a proper localisation strategy where local leadership was promoted. Later, the Inter-Agency Humanitarian Evaluation (IAHE) disregarded the document to advocate for a missing localisation strategy, which was presented by the Yemen Humanitarian Country Team (YHCT) in 2022 and developed by the same group in 2024 (Al Sakaaf, 2024). Nevertheless, despite the multitude of actors present on the ground and the many papers signed, localisation efforts still seem far from efficient in Yemen, as Al Sakaaf's *Localising Aid and Development in Yemen* (2024) testifies.

This is why the discursive attention is placed on this paper. Here, trends, gaps and practical operationalisation of localisation are deeply analysed from a local perspective, and its inclusion will therefore allow for an analysis of how discursive commitments to localisation are practically operationalised, translated, or diluted in the field, exploring potential barriers to implementation and coordination processes.

3. Analysis

3.1 Introduction to Analytical Approach

This chapter applies Fairclough's Critical Discourse Analysis (CDA) framework to examine how the concept of localisation is constructed, operationalised, and stabilised within the selected key humanitarian policy documents. Following Fairclough's method, rather than treating these texts as descriptive instruments, the analysis interrogates them as discursive practices that both reflect and reproduce specific power relations within the humanitarian field.

Following Jørgensen and Philips' (2002) conceptualisation of discourse as both socially conditioned and socially constructed, these documents arguably represent institutional interventions into the broader debate on localisation and can be understood as part of a communicative strategy that both reflects and shapes the humanitarian order of discourse. They are, therefore, not treated as neutral policy instruments but rather as products of institutional authorship, shaped by particular positionalities within the transnational humanitarian field. As such, they are believed to embed ideological assumptions and reflect strategic priorities while simultaneously constituting the frameworks through which humanitarian partnerships, risk, and power relations are negotiated.

Combining scholarly current concerns with the discursive analysis of the selected documents will, ultimately, help test the hypotheses outlined above and uncover a nuanced

understanding of power dynamics, dependencies, and responsibility transfer. To do so, the following sections will be structured according to the proposed indicators to explore several shapes of the challenges permeating the localisation agenda. Specifically, the subsections will go into an in-depth analysis of (1) the framing of risk and responsibility, (2) the agency of local actors, looking into their operational and strategic involvement, and (3) the financial autonomy and control mechanisms enacted by funding actors. Unavoidably, given the fluidity and interconnection of the different mechanisms within humanitarian aid, the indicators will overlap to some extent, but ultimately focus on the main category for the section.

3.2 Indicators

3.2.1 Indicator 1: Framing of Risk and Responsibility

This section will specifically examine how DG ECHO's *Guidance Note on Promoting Equitable Partnerships with Local Responders in Humanitarian Settings* (European Commission, 2023) and the *Humanitarian Implementation Plan (HIP) for Yemen* (European Commission, 2025a) frame the distribution of risk and how they conceptualise risk management. To do so, the CDA framework will be leveraged, employing concepts inherent to discourse analysis by exploring discursive strategies, linguistic choices, and interdiscursive approaches. All in all, H1, and its postcolonial point of departure will be tested through this indicator, investigating the validity of its claim, namely that *Localisation policies function as mechanisms of risk transfer from international to local actors*.

Risk as a Discursive Construct

From a postcolonial gaze, scholars have long criticised the rise of Western *epistemic domination*, a concept suggesting that the Global North possesses hierarchical power over the South, which inherently constructs their knowledge as superior and any other perspective as inferior (McEwan, 2018). It is in this spirit that risk could potentially be viewed as a vehicle of power in humanitarian discourse; indeed, those able to define it and manage it could arguably be seen as the powerful actors holding the handle of the sword towards those bearing it. In this view, risk is not only an operational concern in humanitarian action; it is a powerful discursive tool through which responsibilities are assigned and hierarchies are maintained. This indicator, therefore, interrogates how DG ECHO's policy documents articulate the distribution of risk between international actors and local/national actors (L/NAs), and what this reveals about the

politics of partnership under the localisation agenda. It asks: is risk framed as a shared burden—acknowledging the uneven exposure of actors on the ground—or as a logistical issue to be managed within pre-existing structures of control?

Notably, humanitarian risk includes a nuanced framework of eight interrelated categories: safety, security, fiduciary, legal/compliance, ethical, information, reputational, and operational (ICRC, 2022). These risk types are not evenly distributed along the humanitarian delivery chain. Rather, they reflect distinct institutional anxieties and positionalities: Back donors, such as DG ECHO, are primarily concerned with fiduciary, legal, and reputational risks. Intermediary actors -often UN agencies or INGOs- juggle these concerns alongside operational risks. In contrast, direct implementers are mostly exposed to safety, security, and operational risks, particularly in fragile environments like Yemen. Exemplifying data from the Aid Worker Security Database (AWSD) shows how this last burden falls mainly on L/NAs, as, for instance, between 2024 and 2025, in Yemen, only national staff were either killed, wounded, kidnapped and/or detained, whereas no internationals were affected (AWSD, 2024).

Albeit lacking a comprehensive categorisation of risks, DG ECHO recognises that these risks are borne by different actors in different degrees across the delivery chain. By stating that “95% of victims of attacks on aid workers were staff of national agencies or organisations working in the country” (European Commission, 2023, p. 24), the *Guidance Note* actively identifies the unequal exposure, showcasing a solid step forward from previous risk assessments. This acknowledgement, however, is not accompanied by a fundamental conceptualisation of risks and reconsideration of how they intersect, how they are produced, managed, and distributed within the humanitarian system.

For instance, while the *Guidance Note* acknowledges that security risks are borne differently, the framing lacks a broader structural acknowledgement of the fundamental roots of the lack of security. By avoiding mentioning the political implications, security risks are framed as external threats to be mitigated, rather than as symptoms of systemic inequalities. The proposed solution is indeed to “ensure that adequate resources are provided to fund safety- and security-related costs” (European Commission, 2023, p. 24). These risks, therefore, become something that requires technical remedies rather than structural reforms.

This discursive strategy reflects what Jørgensen and Phillips (2002, p. 72) refer to as the stabilising function of dominant discourses, whereby issues that are inherently political—such as

unequal exposure to danger—are reframed as technical problems requiring administrative solutions. Moreover, by framing the risk as a security issue, the importance of the operational level is overlooked. This creates an even more depoliticised framework that lacks recognition of the power asymmetries embedded in the very design of partnerships between international and local actors. However, it is important to point out that the *Guidance Note* and ECHO in general do not have political power over the international order, and their limited humanitarian reach could potentially reflect internal struggles to reconcile institutional imperatives with a normative aim of equitable partnerships. This tension might arguably point towards an internal wrestle rather than exemplify the postcolonial intent to exercise hegemonic control over locals. Discursively speaking, however, the tension could arguably have been formulated in a more considerable manner, acknowledging the structural limitations embedded in ECHO’s mandate. Practically, ECHO’s promise to “consider the funding of training, equipment and other means of improving the safety and security of local partners to be direct costs” (European Commission, 2023, p. 24) seems to be as much as they can do to tackle risk sharing within their own framework.

The Ambiguity of Risk Sharing

The *Guidance Note* encourages partners to “intensify dialogue with L/NAs” and to “define roles and responsibilities [...] at the earliest stages of programme planning” (European Commission, 2023, p. 24), suggesting a path towards inclusive localisation processes and consideration of local perspectives and effective co-management. However, these suggestions also raise questions about the structure of inclusion to start with; who initiates dialogue? What are the implications of structural powers? Moreover, this could ambivalently be read discursively as a mechanism to institutionalise risk exposure at the local level by formalising it into planning frameworks rather than redistributing the structural conditions that produce it. In other words, risks are constructed as inevitable. Existing power relations and inequalities that produce those risks in the first place are not questioned, but rather embedded in programme planning.

While the guidance encourages partners to provide training, equipment, and safeguarding for L/NAs for operations in high-risk environments, these interventions remain confined to addressing the symptoms of risk exposure rather than its root causes, such as donor-driven funding logics that limit flexibility, short-term project cycles, and subcontracting models that externalise risk while retaining control. This is apparent in the Yemeni context, where national NGOs operate in 299 out of 333 districts -often the most dangerous and

remote- yet local voices express how this proximity does not translate into “proportionate budget allocations or decision-making positions” (Al-Sakkaf, 2024). Local actors, therefore, bear the physical and administrative risks while international actors retain strategic authority and financial insulation. In postcolonial terms, this might reflect a shape of subordination where local actors are still positioned as marginal and submissive, subjects to the control of their international counterparts. Whether this subordination is intentional or institutionally constrained, however, remains an open question.

Notably, the effort to promote co-management of risks is blurred by the confusion generated within the *Guidance Note*. After having acknowledged that (the security) risk affects local/national and international actors in different ways, indeed, the focus shifts to advocating for equitable partnerships by ensuring that “an unreasonable amount of risk is not transferred to L/NAa” (p. 24). However, right after this comes the recommendation to ensure that “risks [are] being managed within the partnerships, rather than being transferred to L/NAs” (p. 24). This unclear formulation leaves space for misunderstandings and shadows the attempt to promote risk sharing rather than risk transfer.

Mutual Trust on Unequal Grounds

Assuming that co-management is preferred over risk transfer, it appears that DG ECHO positions international actors as facilitators or protectors, rather than promoting dialogue on equal grounds between the latter and local actors. This raises important questions about the concrete mechanisms for shared decision-making enforced in the text, as they seem to indicate that local actors are not positioned as equal agents in determining how risks are conceptualised or mitigated. Indeed, the document does suggest that donors and international organisations must “develop their approach to risk,” with local actors invited into that discussion under the premise of mutual trust and transparency (European Commission, 2023, p. 24).

This formulation arguably presents two critical aspects. Firstly, one possible reading of the verb “invite” suggests a power hierarchy that positions international actors as decision-makers, implying that the grounding structure of how to approach risk has already been made by the time L/NAs are to join the conversation. The lack of co-authorship of risk frameworks, therefore, maintains a discursive hierarchy where risk planning is centralised, even as risk absorption is decentralised. On the other hand, this linguistic choice could be seen as a polite call to partnership, rather than a strong command, potentially shifting the view to a more

co-production oriented approach by recognising agency to accept or refuse the proposal from the L/NAs' side. Yet by doing so, encouraging co-production of risk-management frameworks could potentially function as a mechanism to diffuse liability and contribute to transferring risks to L/NAs. Indeed, in this light, failures might be viewed as a shared responsibility, although the agendas as mostly set by INGOs and funding actors.

Secondly, the conceptualisation of mutual trust is conditioned by compliance with European mechanisms, namely focusing on “anti-money laundering and counter-terrorism financing legal framework and sanctioning” (European Commission, 2023, p. 24). This compliance architecture, while arguably essential to prevent funding terror and safeguarding the institutional legitimacy and accountability of EU institutions, including ECHO, brings to the surface operational complexities. Being designed at the European level, the compliance mechanisms could potentially impose a compliance apparatus that is hard to navigate in environments that are highly politicised, such as the Yemeni context. While such frameworks are indispensable, a certain degree of flexibility could potentially help to render operational realities easier to move within, and co-defining such frameworks in partnership with L/NAs actors, while taking into consideration their operational realities, could aid a more equitable relation. Since compliance becomes a precondition for participation, the discourse founded on “mutual trust” is asymmetrically built as operational realities of the two actors involved have two very different standpoints. Indeed, local actors are tasked with operating in environments deemed too insecure for international personnel, and yet they are expected to meet compliance standards and security expectations set by donors in safer and more stable contexts.

In this instance, ECHO's discursive strategy could be seen as pointing towards a contradictory articulation of discourse in terms of equality and power (Fairclough, 1995, p. 79-80). While the formal invitation of L/NAs into co-designing risk frameworks and risk evaluation processes appears to be inclusive, this is strictly conditioned by compliance requirements, which undermines the initial concept of mutual trust. The adoption of universally accepted counter-terrorism measures can be read in two ways. While surely being a legitimate attempt to safeguard institutional and humanitarian integrity, ECHO could be said to employ the concept to mask hegemony under a rational appearance. This discursive contradiction allegedly contributes to constructively stabilising the current hierarchy in humanitarian governance. What Fairclough terms an *apparent democratisation of discourse* (1995, p. 79) is hereby

employed by ECHO to hide current power relations rather than contributing to their elimination.

This structural contradiction is not just discursive but material as well. As reported by Yemeni civil society representatives, “They consider us as implementers, not real partners. If we challenge this, we risk losing the funding for our projects, and without this funding, we risk shutting down” (Al-Sakkaf, 2024, p. 10). This statement underscores the lived consequences of risk delegation: the implicit threat of exclusion or defunding becomes a form of coercive compliance, reinforcing a dynamic where local actors absorb risk without decision-making power.

Arguably, reading it through Fairclough’s development of Gramsci’s concept of hegemony, the *Guidance Note* can be seen as part of a hegemonic project wherein localisation is incorporated into the dominant humanitarian order of discourse without altering its underlying logic. It is indeed through discourse that hegemony, namely conditioning of the masses through “intellectual and moral leadership” (Fairclough, 1995, p. 93), is ultimately articulated. By choosing to reconfigure risk in the language of partnership, compliance, and managerial planning, the document reproduces Western modes of engagement that legitimise international authority while displacing vulnerability downward (Jørgensen and Phillips, 2002, p. 73–76). This discourse, therefore, maintains the established status quo by exemplifying a discursively stable interdiscursive mix (Jørgensen and Phillips, 2002, p. 74) that focuses on donor-centric practices and ultimately jeopardises the potential for transformative localisation.

Final Considerations on Risk Transfer

Ultimately, this analysis arguably points towards the importance of existing power asymmetries and institutional constraints in shaping the management of risk within humanitarian actions. Rather than strictly confirming H1, it opens a space for dialogue about current challenges and future developments. Nevertheless, discursive strategies employed by DG ECHO seem to indicate avoidance of direct accountability, albeit recognising the unequal exposure to risks. Although advocating for risk sharing, this strategy seems to remain mainly theoretical, with no real implications on field operations, mainly due to institutional constraints and compliance barriers.

Building on this analysis of how risk is decentralised without corresponding agency, the following indicator investigates whether local actors are simultaneously granted strategic influence or whether their participation remains operational and subordinate within humanitarian governance structures.

3.2.2 Indicator 2: Agency of Local Actors: Operational vs Strategic Involvement

The following indicator will present an analytical overview of ECHO's discourse regarding the agency given to local actors. While the *Promoting Equitable Partnerships Guidance Note* (European Commission, 2023) strongly advocates for the participation of local actors within the Humanitarian Response Cycle, the perception of genuine involvement on the ground in the Yemeni context seems still far from aligning with the European Civil Protection and Humanitarian Aid Operations. To exemplify the different positions, this indicator will be broken down into four subsections, each analysing a different aspect of the operational vs strategic involvement.

Institutional Positioning & Discursive Hierarchy

As an opening to the localisation framework, ECHO stressed its institutional position, defining itself as a “standard-setting donor” (European Commission, 2023, p. 6), claiming that it holds “conveying power as one of the world's largest humanitarian donors” (p. 6). By doing so, the organisation arguably inadvertently creates a discursive hierarchy, whereby they sit at the top and set the standards, and others have to follow. To reinforce that, although emphasising the importance of localisation, the paper itself is not directly addressed to L/NAs themselves, but rather to potential partners (see fx, European Commission, 2023, p. 27), inviting them to critically address the localisation agenda and respect agreed commitments during the Grand Bargain. The focal point, therefore, shifts from L/NAs to potential partners, removing L/NAs from decisional procedures, as the whole paper reads as a strategic recommendation of already decided practices. This interdiscursive blend of humanitarian ethics and managerial attitude naturalises a top-down hierarchy and allegedly showcases the power imbalance Roepstorff mentions in her report (2019, p. 287), reflecting in the unbalanced structure of humanitarian governance, where funding actors have the ability to set the standards, and local actors have to follow.

Nevertheless, L/NAs are widely mentioned in the paper, and the importance of close collaboration is acknowledged in several instances. A counterargument could therefore be the continuous underlining and active advice from ECHO's side on strategies to promote local inclusion in collaboration mechanisms, improve local participation in needs assessments, and enhance strategic inclusion of L/NAs. To investigate further, the following sections will analyse each of these aspects in depth, with a particular attention to discourse and lexical choices,

simultaneously situating them into the broader context and analysing local voices to counterbalance ECHO's writings and claims.

Local and National Actors: diversifying funding and responsibilities

From ECHO's side, the Equitable Partnerships document clearly outlines the intention to critically assess local environments and engage in meaningful collaborations with committed actors. Section 3.3 specifically addresses the "Participation in strategic response planning and humanitarian implementation plan Programming processes" (European Commission, 2023, p. 30), claiming that "DG ECHO recognises the L/NAs should participate more fully in making strategic programmatic choices" (p. 30). However, this written engagement is not always carried on once on the field, as Al-Sakkaf's (2024) Yemeni report testifies. On the ground, the work of international NGOs is perceived very differently, with a senior manager at a national CSO asserting that "they consider us as implementers, not real partners. If we challenge this, we risk losing the funding for our projects, and without this funding we risk shutting down" (Al Sakkaf, 2024, p. 10).

From a lexical perspective, at the micro level, this sentence seems to convey inferiority from the locals' perspective. The use of "us" to refer to CSOs creates an oppositional dynamic where the locals are on one side of the coin, while "they", referring to donor and international organisations, denotes a generalising attitude that situates all the potential donors and international NGOs into the same category. In this way, homogeneity among internationals is assumed, and they are viewed in direct opposition to local actors. Arguably, this narrative construction contributes to furthering the already existing division at the sociocultural level, where power dynamics are already established. Discursively, therefore, by choosing the above-mentioned vocabulary, the manager establishes a self-positioning of inferiority and unconsciously contributes to reflecting and reproducing the current structural hierarchies embedded in humanitarian discourse. Seeing this in Roepstorff's (2019) eyes, this binary opposition of locals vs internationals is exactly what is problematic within the localisation agenda. The manager, by choosing this vocabulary, inadvertently encourages the same narrative structure he aims to criticise and dismantle.

Alternatively, his statement could also be read as a subtle critique of donor dominance, pointing out the potentially exploitative nature of the current structure while simultaneously underlining the lack of alternatives. As, according to Fairclough, discourse is both constitutive

and constituted, being already part of a system built on intrinsic power asymmetries, it somehow forces the manager to use this binary language. However, this language, as pointed out beforehand, reinforces the very same power structures, and an endless loop of dependency is linguistically created through discourse, leaving this research with an open question on how to possibly break this circle and thereby challenge hypothesis 2 by creating a new localisation structure outside of existing power relations.

Moreover, the claim highlights the importance of funding when it comes to the practical implementation of projects from locals, as they seem to implicitly be directed towards accepting the given conditions without any openness to new proposals. This, arguably, reinforces dependency on international donors, considerably limiting local agency. More than this, Al Sakaaf (2024) points out how CBOs always receive less funding than national NGOs due to their less established names and networking structures (p. 19). The role of CBOs is usually more exposed to risk, as they are the ones operating in hard-to-reach areas, often only accessible to them. However, the distribution of funds often happens through the involvement of national actors due to strict security requirements from the donor side, leading to a misdistribution of funds internally. This arguably creates a whole chain of dependency, where again, international donors stand at the top and set the requirements, international NGOs come second, enforcing the requirements, national NGOs come right after, with the power to manage the funds received on an internal level, and locals and CBOs are at the bottom, and have no choice but to follow the set demands.

The internal (lack of) distribution of funds, however, is most often ignored and not accounted for in donors' documents, as the ECHO's constant use of the *L/NAs* umbrella acronym testifies. Indeed, as Roepstorff (2019) points out, local and national actors are not the same, as "subnational actors and community-level civil society organisations may view themselves as local in comparison to both national and international actors" (p. 289). They do not receive the same funds, which often only go to national actors, putting CBOs in a condition of structural marginalisation. Rather than encouraging an internal distribution of responsibilities, then, the lack of differentiation between local and national actors, and extensive adoption of the *L/NAs* homogenising category, the current funding mechanism ends up exacerbating existing power differences, structurally privileging NNGOs and leaving CBOs structurally marginalised.

The same dynamics are visible in representation structures, as Al Sakaaf (2024) points out. After a careful mapping of the Yemeni context, her report shows how complex and intricate the Yemeni local platform is, and how those termed *local actors* are sometimes not really represented by Yemenis at all. If by local one wants to refer, as Roepstorff (2019) mentions, to the “sphere of the country in which the intervention occurs from the outside world” (p. 289), locals in Yemen should be Yemeni, but this is not always the case. A clear example is the Yemen Partners Group (YPG), established in 2023 as a coordination body for donors. While representing an essential platform for donor coordination and well aligning with the area-based approach promoted by ECHO, the YPG has been widely criticised for hardly having any Yemeni representation within its main actors (Al Sakkaf, 2024). Indeed, the group is led by the World Bank, the European Union, and the UN, and while this improves donor coordination internally, the inclusion of local voices is still missing from the equation and raising concerns among practitioners (Al Sakkaf et al., 2024). Its implementation arm, the Yemen Partners Technical Team (YPTT), also lacks Yemeni representation (Al Sakkaf, 2024), which contributes to rendering the area-based approach more difficult, given the lack of local knowledge. What could be understood from this data is notably the fact that new coordination mechanisms are being integrated in Yemen, as the ECHO guideline proposes (p. 32), but nevertheless, this still seems to be a work in progress rather than an achieved step marker, and, even in these mechanisms, local representation is still missing.

Discursively, ECHO acknowledges these risks by inviting partners to include local actors within context analysis and needs assessments, further underlining their nuanced understanding of the local context and better access to hard-to-reach areas. While discussing need assessments (European Commission, 2023, p. 29), ECHO recognises the vital role of L/NAs, but confines them to providing access and proximity to affected populations. Nevertheless, this seems to be challenged in the *Key considerations for partners* section, where they invite collaborators to ask themselves, “How are L/NAs included in needs assessments and programming processes? Is their participation meaningful, going beyond their involvement in collecting data from communities?” (European Commission, 2023, p. 30) and “How may L/NAs be made part of strategic processes such as HIPs and HRP programming? Who should participate and what should be the modalities of participation?” (p. 30).

With these questions, ECHO pushes its partners to critically reflect on local involvement, demonstrating acknowledgement of potential criticisms and openness to equitable

relationships. However, the specific choice of verbs such as “include” and “participate” arguably veils a gatekeeping attitude whereby locals become objects of inclusion rather than active agency bearers. ECHO positions itself and its partners as decision-makers and coordinators of L/NAs, using its power as a funding actor to decide whether locals should be involved in strategic processes or not. Analysing the choices made at the textual level allows us as readers to make considerations for the meso and macro level, whereas these choices arguably convey an ideology based on intrinsic superiority and the ability to decide on the participation of locals, due to the current power hierarchies in place, where decision-making power is held by the financial provider.

This is followed by another critical question, stating the following: “Is the national coordination platform the appropriate body to engage with for these processes? If not, why not? Which other entities or groups would be more appropriate?” (European Commission, 2023, p. 30). Admittedly, with this formulation, ECHO implicitly recognises potential clashes with the formal authorities, and spurs attention in taking them for granted as the go-to organisations for equitable partnership. More than that, they employ a self-regulating discourse, acknowledging their potential biases and integrating critique into their own language. Nevertheless, although trying to actively tackle the participation pillar of localisation, ECHO fails to completely address the funding pillar, as they only provide indirect funding to local NGOs, and, although increasingly supporting localised financial models (European Commission, 2023, p. 37), they do not monitor the local funding mechanisms, and lack consideration of the diverse nature of local partners, as the next section will explore.

Cost-Bearing and Capacity Building

When giving voice to locals, and specifically targeting funding models, Al Sakka (2024), underlines how NGO workers in Yemen complain “that they face the same restrictions as the international community in terms of government bureaucracy and red tape, but more severely” (p. 18). She, then, goes on to say that “[r]igid donor requirements and lack of support for logistical and operations costs undermine the Yemeni’s partners’ ability to navigate these challenges” (p. 18). By focusing on the unequal distribution of funds between strategic planning and operational activities, a new differentiation comes to light. As seen, strategic planning and coordination are mainly carried out by external actors, while implementation is left to locals. This, when compared to the financial support received by both, showcases how, once again, international actors seem to be privileged over local ones. Indeed, if a higher percentage of the

funding goes to strategy development, and only a minor or no part is left to cover operational costs, the financial burden is shared unequally.

Redirecting the attention once again to the *ECHO Guidance Note* (European Commission, 2023), chapter 5 specifically addresses the issue by mentioning how one of their goals is to “facilitate access to localised financing models” (p. 37). Among other things, ECHO mentions how, “since 2019, the European Commission has been supporting selected CBPFs” (p. 37), referring to the Country-Based Pooled Funds managed by OCHA (CBPF, 2025). However, analysing this statement through CDA allows us to focus on what is left unsaid, namely the lack of elaboration on the structure of pooled funds, as funding CBPFs is not equivalent to funding locals. Indeed, the allocation of CBPFs is complex and often leaves L/NAs behind in comparison to their international counterparts.

For example, OCHA shows that of the total of 938 million \$ allocated in 2024, only 35% went to national NGOs, compared to 57% to international NGOs (CBPF, 2025). This still represents a growth of 21% in allocation to national patterns compared to 2021, but remains a very low percentage when compared to the total numbers. So, while ECHO’s use of the term “facilitate” might convey a supportive role, it does in practice obscure the lack of direct funding to local organisations and exposes an internal contradiction within its discourse, of truly contributing to localisation, where in reality it seems more like a *nationalisation* rather than a *localisation*. Also, this language conveys again a feeling of superiority, as ECHO positions itself as a “capacity builder” and “facilitator”, indirectly implying that local populations do not have the tools to build their capacity on their own and therefore always need external intervention, which keeps them in a system that continuously legitimises the concentration of power in international hands.

Apart from showcasing their increased contribution to CBPFs, ECHO claims to “encourage its partners to design and submit innovative response models for special financing” (European Commission, 2023, p. 37). The use of the term “encourage” highlights how this approach is far from being a priority, but is rather seen as bringing in positive side effects, once enacted, without really pushing partners towards a more committed attitude of inclusion. ECHO constructs itself as an advisor to others, while constructing L/NAs as receivers, creating a discourse in which creative solutions are monopolised by international actors, and therefore reinforcing a paternalistic ideology whereby the current structures of power are reinforced and maintained. Once again, indeed, the statement is directly referred to

international partners, rather than locals, which further reinforces the current positional hierarchy and indirectly deprives L/NAs from innovative thinking, assuming that it is only internationals that are capable of innovation.

Speaking to the creation of innovative response models, Al Sakkaf (2024) testifies how, in 2012, an innovative effort from Yemeni communities to create an International Fund for Supporting Yemen's Development was met with rejection from the international community. The idea, totally Yemeni-led, was aiming at tackling criticism over the lack of political mediation and instability of the national government, by providing a body independent from the government, but including its representatives, and actors from Yemeni CSOs to decide on country priorities and propose projects to potential donors. The rejection of this kind of proposal seems to testify to how international actors, at the time, had no interest in taking into confederation local voices and kept their own agendas going without interference. Arguably, the situation has evolved since then, and more recent examples are needed to testify whether the equation still stands like that.

To do that, the next indicator will analyse current financing mechanisms and their implications, to test both hypotheses through a financial lens, investigating donor engagement and local autonomy.

Final Considerations on Local Agency

All in all, this indicator provides food for thought within the framework of H2. It points out the importance of institutional positioning and acknowledging that current power structures have a huge influence on local agency. However, it also problematises the main claim of H2, suggesting that this dependency is co-created rather than simply implemented. Nevertheless, structural inequalities still persist, both between INGOs and NNGOs and more subtly between NNGOs and CSOs. Differences in funding are observed, which inevitably lead to diversification of capacities, and therefore success rates, and continuous engagement in humanitarian projects. While showcasing a strong drive towards local capacity building, ECHO lacks a holistic understanding of local, which would permit it to differentiate between nationals and CBOs. Arguably, this indicator points towards recognising the adoption of critical terms, such as Roepstorff's *critical localism*, which would indeed allow for the above-mentioned distinction and nuanced understanding of locals.

3.2.3 Indicator 3: Financial Autonomy and Control Mechanisms

This indicator directly speaks to H2, specifically aiming at investigating dependencies and power asymmetries by focusing on financial mechanisms, which are, as Al Sakkaf mentions (2024, p. 10), one of the funding pillars of localisation, together with “partnerships; participation; capacity strengthening; coordination and complementarity; policy influence; and leadership” (p. 10). While other aspects, such as participation and coordination, have already been touched upon, funding plays an essential part in the localisation agenda as it constitutes the basics without which no projects could be implemented. However, Yemeni examples show how funding priorities are far from being localised, as national CSOs highlight their struggles in getting their voices heard by donors and international organisations (Al Sakkaf, 2024, p. 10). This section will specifically investigate the intertwinement between ECHO’s discourse and the reality in Yemen.

Operational Feasibility and Funding Control

As the main document outlining funding priorities for Yemen for 2025, ECHO’s *HIP for Yemen* (European Commission, 2025a) is structured as a guideline for partners and goes hand in hand with the *Equitable Partnership Guideline*. Analysing the document from its very first sentence, one could arguably see the same discursive hierarchy mentioned in Indicator 2, as the HIP is said to have been prepared “on the basis of financing decision ECHO/WWD/BUD/2025/01000 (Worldwide Decision) and the related General Guidelines for Operational Priorities on Humanitarian Aid (Operational Priorities)” (European Commission, 2025a, p. 1). This outlines once again how funding decisions are centralised in the EU and, with no consultation with L/NAs, consequently contribute to positioning them as submissive actors, willing to accept already decided priorities without being given the chance to influence the decision.

When analysing these priorities closer, particular attention needs to be put on the current situation in Yemen, where, as ECHO claims, “humanitarian access to people in need is increasingly challenging” (European Commission, 2025a, p. 6) and “[t]he national response remains highly dependent on external support, in all areas of Yemen” (p. 5). In this context, attention to operational feasibility becomes a pivotal aspect of focus from the donor’s side, as ECHO claims its careful approach, underlining how they “may adapt the geographical and sectoral funding priorities to provide essential services where access is not hampered and limit staff exposure risks” (p. 7). By framing the adaptation as a possibility rather than a certainty,

ECHO maintains decisional power and possibly leaves hard-to-reach areas uncovered. Moreover, the operational risk is possibly transferred onto the local actors, as they are the only remaining players to access these areas. Rather than actively aiming at L/NAs empowering, this approach seems to keep the current power asymmetry in place by granting responsibility for the needed shifts to donors themselves, and not putting L/NAs into the picture by including their expertise in the assessments. This behaviour seemingly contradicts ECHO's guideline, where the focus on co-assessments of risks and needs, and integration of local into context analysis is said to be pivotal to a successful localisation agenda (European Commission, 2023, p. 29).

Additionally, the HIP claims that “[n]ational NGOs play a critical role with local access and contextualised knowledge that is vital to the analysis and design of the humanitarian response in Yemen” (European Commission, 2025a, p. 7). This sentence seems to point towards an opening to local agencies, but the emphasis on providing access once again contributes to the depiction of L/NAs only as implementors rather than active parts in strategic commitments. The recognition of the critical situation of Yemen seems to be strategically used by ECHO to direct funding towards the priorities set in their agendas, and even the willingness to modify them according to the situation on the ground seems to be guided by security concerns for their own staff rather than humanitarian commitments. The fact that it is the donors who hold the power of deciding when and how to change the priority agenda further contributes to the maintenance of current power relations within the humanitarian chain.

Compliance as Strategic Gatekeeping

The HIP goes on highlighting how “[t]he humanitarian response shall be compliant with EU thematic policies and guidelines that are described in the HIP policy annex” (European Commission, 2025a, p. 8), continuing to explain how ECHO's focus is to cover the “most urgent, life-saving needs and protection” (p. 8). Compliance mechanisms are, therefore, a prerequisite to humanitarian responses focusing on life-saving needs and protection, and, as specified in the Annex, these mechanisms are set out by ECHO's headquarters, in accordance with field officers (European Commission, 2025b, p. 1), once again decided by EU members with no contribution from locals. Indeed, when mentioning needs assessments, the HIP asserts that “[p]artners should demonstrate the needs based on localised assessments”, emphasising how the assessment is indeed carried on by ECHO representatives, even if localised, with no contribution from locals.

However, the Annex also emphasises ECHO's willingness to improve partnerships with locals by encouraging projects that, in line with the *Equitable Partnerships Guideline*, include participation and leadership of local and national actors, with attention to inclusion in the governance process and appropriate funding allocation (European Commission, 2025b, p. 7). The use of vague language as "appropriate share of funding", however, leaves the final decision to ECHO itself, again positioning them at the top of the power pyramid. Moreover, while mentioning projects of similar quality, they assert that "priority will be given to proposals where at least 25% of DG ECHO's contribution will be spent on activities implemented by local and national actors" (p. 10), once again setting local implementation as the deciding factor, rather than strategic involvement.

Conditional Autonomy

As outlined in the *Equitable Partnerships Guideline* (European Commission, 2023), the "do no harm" principle is pivotal to the localisation agenda. ECHO claims that "the unintended effects of humanitarian aid on L/NAs should be monitored, such as potential negative effects of international presence, e.g. [...] undermining existing national coordination bodies of the exclusion of L/NAs from the humanitarian response " (p. 33). In the HIP for Yemen, this argument is further reinforced by outlining how "[p]roposed actions are to take into consideration self-reliance capacities of targeted households/communities and define efforts to build upon them" (p. 8). The use of language, however, here becomes indicative of the positionality and power inherent to the sentence. Indeed, by saying that proposed actions "are to take into consideration self-reliance capabilities", these are almost depicted as a side-effect, and not a priority to look for while designing project proposals. Indeed, local autonomy does not seem to be boosted, but rather the dependence upon the international community is continuously underlined (European Commission, 2025a, p. 5), constructing locals as unable to provide for themselves and constantly reliant on external help.

ECHO's funding architecture further reinforces conditionality. Data from IASC (2024) shows that in 2024, 98,88% of ECHO's funding was tightly earmarked, and 0% unearmarked. This, while ensuring coherence, efficiency and accountability for the organisation, leaves partners and L/NAs without any decisional power on potential changes to pre-approved projects. When asked to comment on this percentage, ECHO shifts attention to allowing greater flexibility through programmatic partnerships instead, relegating the heavily earmarked funding to the existing legal framework. Arguably, by employing a discursive strategy of

deflection, ECHO reorients its discourse towards a safe legal environment, where potential criticisms of this choice have little space.

Another path towards enhancing autonomy seems to be coming from more recent proposals, such as ECHO's willingness to support multi-year projects and programmatic partnerships, defined as "a strategic approach, supporting identified strategic priorities/initiatives of shared interest between DG ECHO and the partner (or consortium of partners)" (*DGEcho WebSite*, 2025). This approach could arguably be seen as reducing local dependency on short-term projects and contributing to the empowerment of locals by funding longer projects and therefore leaving more space to manoeuvre the funds over time. However, ECHO's formulation seems to privilege the economic benefit to donors, rather than the one to locals. While describing the benefits of such an approach, it praises effectiveness gains and efficiency gains, highlighting how PPs would contribute to "reduced administrative costs allowing partners to reach out to more beneficiaries" (*DGEcho WebSite*, 2025). This represents a missed chance to refer to the autonomy of L/NAs, which becomes conditioned by the economic interests of the donors.

In the specific regard of Yemen, the HIP (European Commission, 2025a) asserts that "there will be no new PPs in 2025. Nonetheless, DG ECHO will support multi-year and/or multi-annual funding projects (with a minimum funding allocation of 24 months and can be more), where it increases the efficiency and effectiveness of the action" (p. 9). Once again, by mentioning the efficiency and effectiveness of the action, ECHO seems to lack recognition of the positive effect such prolonged funding would have on local empowerment, but rather chooses to focus on the economic gains.

Final Considerations on Funding Mechanisms

Essentially, the analysis on indicator 3 points towards a confirmation of H2, sustaining how the current financial mechanisms are pivotal in maintaining the decisional power centralised to the EU level and how the decision-making process often takes place with minimal to no involvement of L/NAs. The nature of ECHO's funds, moreover, as that of many other funding actors, is strictly tight to severe compliances, which have to be respected and enforced upon locals, thereby limiting their decisional power and consequently their empowerment.

4. Hypotheses Testing and Revising

Enlightened by the analysis of indicators throughout Chapter 3, this section critically discusses the hypotheses formulations by practically testing them against the findings, and later revising them accordingly. It therefore aims to provide an evidence-based formulation of a new hypothesis, informed by the newly found evidence around localisation practices embedded in ECHO's discursive practices. Ultimately, this chapter will help in answering the main research question outlined at the beginning of this thesis, namely: *How and to what extent does localisation in humanitarian aid function as a means of risk transfer rather than genuine empowerment of local actors?*

Synthesising each indicator individually, the two hypotheses will be discussed and revised, starting with the initial formulation whereby risk transfer and power asymmetries were seen as the main drivers of the localisation agenda. Indeed, the previously mentioned hypotheses sounded as follows:

- **H1:** *Localisation policies function as mechanisms of risk transfer from international to local actors.*
- **H2:** *Rather than enabling empowerment, localisation reinforces existing power asymmetries by decentralising operational responsibilities without shifting financial autonomy or decision-making power.*

4.1 Synthesis of Indicator 1

After the careful analysis carried on above, it can be said that the findings are more inclined towards confirming H2, while H1 can only partially be accepted. Indicator 1 explicitly showcases the willingness of ECHO to recognise diverse exposures to risks from the different actors involved in the localisation process. While locals are more prone to having threatening consequences from their daily involvement in high-risk activities, the same cannot be said for international actors, who, due to the nature of their agreements, most often do not face the same exposure to the same kind of risks. ECHO's acknowledgement of the unequal mechanisms navigated by INGOs vs L/NAs dismantles the hypothesis that the localisation agenda clearly intends to transfer risks onto the locals.

More than that, ECHO's lack of political power positions them in a weak spot to actively combat the structural inequality on which the different risks arise. Their institutional positioning, therefore, although standard-setting, does not allow them to intervene politically and actively tackle the structures responsible for the unequal sharing of risk. Even by wanting to

act, therefore, ECHO's hands are tight by the lack of political power embedded in their mandate, and their discourse is formulated accordingly. Nevertheless, leaving this unsaid could arguably contribute to depoliticising the issue and potentially uphold the current power imbalances between internationals and locals, a thesis that partly confirms H2. Indeed, even if political change is beyond ECHO's scope, the discourse around the structural nature of risk imbalances could have been framed differently by driving the conversation around risks beyond a technical matter.

4.2 Synthesis of Indicator 2

Indicator 2 has strongly contributed to the debate around empowerment in localisation. While the analysis carried on in section 3.2.2 seems to point towards a clear confirmation of H2, it also provides nuances to counterargue. Indeed, if it is true that ECHO views L/NAs mostly as implementers, voices from Yemen have insightfully provided an insider view of the matter. Indeed, Yemeni NGO workers adopt the same "us" vs "them" narrative, which further amplifies the gap between locals and internationals, while strongly defining the two categories in opposition to each other. As Roepstorff argues, this juxtaposition of roles, common in the current discourse, leads to "blind spots in the analysis of exclusionary practices of the humanitarian sector" (Roepstorff, 2019, p. 284).

Nevertheless, the findings have shown that the same homogenising narrative is carried on by locals as well, creating a uniform view of international actors that is precisely placed as an opponent to the local actor. While strongly sustaining Roepstorff's call for a *critical localism* to reconceptualise the local, these results advocate for a similar position to be taken by both parties. Indeed, until L/NAs keep using the very same vocabulary that keeps them in this dichotomy of roles, the institutional imbalances will keep repeating. Therefore, H2 can be confirmed only partially as dependency is not only donor-imposed, but reproduced by local adoption of postcolonial narratives as well. While this supports H2, it also refines it to include both actors in the reinforcement of power asymmetries through discourse. Indeed, if it is true that the structural asymmetries are mainly carried on by internationals, the discourse is not challenged by locals, which somehow makes them complicit in their own subjugation to the stronger power of the internationals.

4.3 Synthesis of Indicator 3

Lastly, Indicator 3 seems to vastly confirm H2. A strong prevalence of tightly earmarked funding deprives local actors of any decision-making power. Likewise, the framing of funding adaptability as a possibility rather than a certainty leaves L/NAs at the mercy of funding entities, rather than empowering them with the strategic responsibility to self-manage the funding in case of unexpected challenges. Constructing locals mainly as implementors, without defining them as strategic partners, further contributes to validating that localisation reinforces existing power asymmetries rather than genuinely empowering local actors through financial and discursive means. Lastly, the narrative around the funding of programmatic partnerships, centred around economic benefits rather than local empowerment, deprives L/NAs of the potential discursive empowerment that could have arisen otherwise.

All in all, the funding structures and the discursive practices around them seem to strongly confirm H2, as a structural recognition of power asymmetries is not only missing but actively avoided by ECHO. Indeed, the structural dependence embedded in the current funding of humanitarian and development aid is preserved by the strategic exclusion of locals and the strict compliance requirements. While the discourse of localisation could potentially lead to a more equitable partnership, the current funding structures undermine this possibility and end up exacerbating the structural hierarchy currently predominating in the humanitarian sector, where it is indeed those who are financially stable who possess the power to shape and control humanitarian projects in the Global South.

4.4 Revising the hypotheses

In consideration of the synthesis of the indicators provided above, this section will now attempt to reformulate the hypotheses. Indeed, as part of a deductive qualitative analysis, the hypothesis refining results in a new formulation that better fits the study and accounts for the nuanced complexity within the analysed cases (Fife & Gossner, 2024). Firstly, it is important to recognise that the previously formulated hypotheses are supported only to a certain extent, and in different degrees. While H2, as seen above, can be partially supported by the data analysed in this study, H1 needs substantial revision. Nevertheless, refinement is needed for both hypotheses to account for the different nuances that emerged during the study. Therefore, the hypotheses could be reformulated as follows:

- *H1: Localisation discourse, while recognising different exposures to risk, depoliticises the structural framework around which risk arises by framing it as a technical problem, thereby reinforcing unequal distributions of power.*
- *H2: Localisation reinforces existing power asymmetries through donor-controlled funding and locally adopted exclusionary narratives. In this way, dependency is relationally reproduced, other than solely donor-imposed.*

By rephrasing the hypotheses in this way, the study accounts for the evidence gathered through all three indicators and acknowledges that the discourse involved in the framing of localisation plays a huge part in conceptualising the agenda and contributes to a large extent to maintaining the current hierarchies of power.

While it has been clear that ECHO does not intentionally offload risk to L/NAs, the discursive practices around risk framing end up stabilising the unequal distribution, making use of what Fairclough terms *stabilising discourse* to naturalise inequality under the guise of neutral, technical language. On the other hand, the study has shown that ECHO largely depicts L/NAs as implementors, rather than strategic partners. However, the local adoption of the same mindset hugely contributes to the maintenance of the current hierarchies of power. Instead of actively challenging the opposing narrative around localisation, locals keep using terms like “us” and “them” to prove their points, ending up homogenising internationals as they are being homogenised by INGOs’ language. Critical discourse analysis, in this instance, has helped uncover linguistic features undermining the relational nature of dependency, rather than confirming the monolinear imposition of power from donors to L/NAs. Thus, this newly formulated hypotheses account for a diverse configuration of power asymmetries, whereby they are not only enforced top-down, but rather discursively co-constructed and institutionally maintained.

5. Limitations & Further Research

The study does not come without limitations. The sole reliance on document analysis highly impacts the thesis. Real operational mechanisms cannot be observed only from a desk analysis, and all three indicators, framing of risk, strategic empowerment, and financial mechanisms, while observed in the field, might give completely different results. According to views from Anthropology of Development (Mosse, 2013), indeed, policy documents can never capture the actual mechanisms of fieldwork, as they often need to go through a highly bureaucratised

process which adapts field practices to donor compliance mechanisms. Indeed, as Rottenburg (in Mosse, 2013) points out, “there is a 'loose coupling' of official representations [...] and organisational practices which draws ethnographic attention to the trading zones and translation practices - not the objects or actors but “what occurs between them”” (p. 233).

An attention to informal practices, for instance, could completely reverse the findings of this thesis, as compliance mechanisms can sometimes be worked around by middle funding actors, and locals can find ways to achieve strategic ownership that are not necessarily documented in official files. These nuances are impossible to capture by solely focusing on discourse analysis, as more in-depth qualitative research methods could have been used to do so. Surely, then, acquiring local perspectives through qualitative interviews or ethnographic work in Yemen would have enriched the study with direct local perspectives. Similarly, direct contact with exponents from DG ECHO would have contributed to a broader perspective regarding the European commitments. Further research in the area might want to investigate how informal practices challenge the claims made above by establishing direct contact with populations affected, as well as ECHO’s representatives.

As per this study, voices are filtered through text, and the reliance on Critical Discourse Analysis as the primary method of analysis, while useful to uncover linguistic strategies and hidden ideologies, cannot totally capture the material practices that prevail in programme implementation. Moreover, due to the nature of CDA, the study unavoidably shows a degree of subjectivity, as complete objectivity is incompatible with the model, despite sustained efforts at reflexivity. Embedded in CDA is indeed the belief that “[i]n the name of emancipation, critical discourse analysis approaches take the side of oppressed social groups” (Jørgensen & Philips, 2002, p. 64). While CDA is inherently interpretative, efforts have been made to use pragmatic analysis and evidence-based data to back up both parties, without explicitly preferring one over the other.

Lastly, choosing Yemen as a single case study, while allowing for a depth investigation into the local dynamics, limits the scope of the study, and therefore undermines the generalisability of findings. Indeed, the study is highly contextual: while analysing data specific to Yemen has been useful to uncover power dynamics in the given context of study, these dynamics can manifest differently in other regions. Nevertheless, in line with Yin’s (2009, p. 15) inputs on case study research, generalisability comes, in this case, from its theoretical contribution, more than its empirical findings. To investigate this last aspect, other possible

contributions for further research, therefore, might be the inclusion of other regions/countries and donor entities, resulting in a comparative study that enhances statistical generalisability of findings, as well as a practical investigation into how the solutions proposed might be operationalised in practice in the humanitarian field, from both donors and locals.

6. Conclusion

Localisation has been and still remains a contested term, and the underlying mechanisms of the commitments taken during the Grand Bargain in 2016 are hard to unpack. Who are the *locals*? And are financial transfers all that is needed for a localising process to take place? Or does empowerment come from delegating responsibilities? And if so, which ones? These questions have been the guiding motivation for this study, which sought to investigate the deeper implications involved in the localisation agenda, mainly responding to the critical problematisation of the agenda and investigating *how and to what extent does localisation in humanitarian aid function as a means of risk transfer rather than genuine empowerment of local actors*.

Through analysis of textual features, discursive practices and their relative social practices, the research has helped to uncover hidden processes behind the localisation agenda. By analysing ECHO's localisation framework and the way this is received by Yemeni counterparts, both international and local voices have been put on the stage, with their respective points of view maximised under textual analysis. Ultimately, the main analytical contribution of this study was to put the *discourse* around the localisation agenda at the centre of attention, uncovering linguistic mechanisms that are often overlooked, and shedding light on how language is used by both locals and international actors involved in humanitarian and developmental actions.

By exploring the discourse around risk and empowerment through different indicators, it has shown how, despite ECHO's intentions to mitigate risk transfer, local actors are constructed mainly as implementors of international agendas, and thereby exposed to risks that are inherent to the power inequalities embedded in such agendas. Although recognising different risk exposures, ECHO's case has provided a clear example of how failing to address the political reasons behind the current power differences, and thereby depoliticising risk, ultimately contributes to maintaining them and prevents international funding actors, such as the European Agency, from meaningfully reducing the transfer of risks onto local actors.

More than that, challenging the initial claims related to empowerment and dependence, the study has uncovered a certain degree of discursively sustained dependence by locals on internationals, which ultimately refines the main claim of H2, namely that localisation reinforces existing power asymmetries. On the contrary, the study has shown that these power relationships are indeed co-constructed and that the locals themselves play an important role in linguistically sustaining the same power hierarchies that they are actively challenging. Lastly, by focusing on the funding structures of humanitarian work, the research has addressed contradictions embedded in the earmarking of funds, which ultimately undermine adaptability and reject the flexibility necessary to fund programmes that are based on local needs and not only dependent on strict compliance mechanisms.

By rephrasing the initial hypotheses into newly formulated claims, the thesis shows how localisation ultimately operates as a co-constructed process, highly dependent on current power structures. Viewing these findings through the eyes of the two main contributors of this study, Fairclough and Roepstorff, has several implications. Theoretically, it advances Roepstorff's view on *critical localism* by expanding her focus beyond a critique of international actors. Indeed, by theorising that dependence is a relational practice, the scholar's claim is broadened to include local views, understanding dependency and discursive fallacies not only as internationally imposed, but also as locally co-constructed. On a methodological note, Fairclough's CDA, and especially the intersection between discursive practices and social practices, and his focus on discourse as both constitutive and constituted, have uncovered how discourse acts as a stage for power structures' reproduction, but also a strong, potentially challenging weapon against them.

The importance placed on discourse calls for a renovated, transformative use of language that fundamentally decolonises both international and local voices. Until both parties realise that a fundamental shift in discourse and a politicisation of language are needed, the existing power structures are bound to stay in place. While arguably slowly moving towards a more inclusive direction, a major shift needs to happen within contemporary humanitarian policy to avoid relying on priorities decided during the Grand Bargain almost a decade ago. Viewing localisation as more than an operational process, and acknowledging the need for a discursive transformation, could be the start of a larger unleashing of its transformative potential. In this way, localisation can more effectively shift power to locals while strengthening their strategic decision-making and actively advocating for their greater autonomy, thereby

practically challenging today's humanitarian standards and opening the space for more equitable futures.

Bibliography

- About us.* (2025). *European Civil Protection and Humanitarian Aid Operations.*
https://civil-protection-humanitarian-aid.ec.europa.eu/who/about-echo_en
- Almaweri, A., & Al-Anami, H.* (2025). *Local Service Provision During War- A Case Study of Yemen.* *Public Administration and Development.* <https://doi.org/10.1002/pad.2097>
- Al Sakka, N.* (2024). *Localizing Aid and Development in Yemen.*
<https://sanaacenter.org/publications/main-publications/23687#:~:text=This%20study%20examines%20the%20key%20barriers%20and%20opportunities,localize%20aid%20and%20the%20realities%20on%20the%20ground.>
- Al Sakka, N., Harper, A., & Thorpe, J.* (2024). *Development is Coming: Be Careful What You Wish For.* <https://sanaacenter.org/publications/main-publications/21886>
- Bryant, A., & Charmaz, K.* (2019). *The SAGE Handbook of Current Developments in Grounded Theory.* SAGE Publications Ltd, <https://doi.org/10.4135/9781526436061>
- CBPF.* (2025). *Welcome to country based Pooled Funds Data Hub.*
https://cbpf.data.unocha.org/?gl=1*i03lmg*ga*MjA3MjM3NzU4NC4xNzUwODczMzUz*ga_E60ZNX2F68*cZ3NTQyMjgyMDEkbzQkZzAkDE3NTQyMjgyMDEkajYwJGwwJGgw#fundingoverview_heading
- DGEcho WebSite.* (2025).
<https://www.dgecho-partners-helpdesk.eu/programmatic-partnership/programmatic-partnership>
- Development Initiatives.* (2024). *Falling short? Humanitarian funding and reform.*
https://devinit.org/files/documents/1506/falling_short_humanitarian_funding_and_reform.pdf
- Dissanayake, R.* (2024). *Localization in Theory and Practice* (CGD Policy Paper 346). Center for Global Development.
<https://www.cgdev.org/publication/localization-theory-and-practice>
- DRMKCa,* (2025). *INFORM > INFORM Risk > Country Risk Profile.*
<https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Risk/Country-Risk-Profile>

- DRMKCb, (2025). *INFORM > INFORM Severity > Severity Facts & Figures*.
<https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Severity/Severity-Facts-Figures>
- Egeland, J., Harmer, A., & Stoddard, A. (2011). *To stay and deliver: good practice for humanitarian in complex security environments*. [To Stay and Deliver - Good Practice for Humanitarians in Complex Security Environments \[EN/AR\] | OCHA](#)
- Elayah, M., & Al-Mansori, R. (2024). Yemen's humanitarian collaboration during conflict: UN and local NGOs in focus. *World Development Perspectives*, 34, 100585.
<https://doi.org/10.1016/j.wdp.2024.100585>
- European Commission (Ed.). (2023). *Promoting equitable partnerships with local responders in humanitarian settings: DG ECHO guidance note*. Publications Office.
<https://doi.org/10.2795/653711>
- European Commission. (2025a). *Humanitarian Implementation Plan (HIP) for Yemen*.
https://ec.europa.eu/ecbo/files/funding/bip2025/ecbo_yem_bud_2025_91000_v1.pdf
- European Commission. (2025b). *Technical Annex. Yemen - Financial, Administrative, and Operational Information*
https://ec.europa.eu/ecbo/files/funding/bip2025/ecbo_hf_bud_2025_91000_ta_v2.pdf
- Fairclough, N. (1995). *Critical discourse analysis: The critical study of language* (Nachdr.). Longman.
- Fife, S. T., & Gossner, J. D. (2024). Deductive Qualitative Analysis: Evaluating, Expanding, and Refining Theory. *International Journal of Qualitative Methods*, 23.
<https://doi.org/10.1177/16094069241244856>
- Flyvbjerg, B. (2006). Five misunderstandings about Case-Study research. *Qualitative Inquiry*, 12(2), 219–245. <https://doi.org/10.1177/1077800405284363>
- De Geoffroy & Grunewald (2017). *MORE THAN THE MONEY: Localisation in Practice*. Trocaire.
<https://www.trocaire.org/sites/default/files/resources/policy/more-than-the-money-full-report.pdf>
- IASC. (2024). *Grand Bargain Self Reporting 2024*. EU/DG ECHO
interagencystandingcommittee.org/sites/default/files/2024-09/EUDG%20ECHO%20-%20Grand%20Bargain%20Self%20Reporting%202024_0.pdf

- ICRC. (2022, June). RISK SHARING IN PRACTICE. Ministry of Foreign Affairs. https://interagencystandingcommittee.org/sites/default/files/migrated/2022-10/Risk%20Sharing_Case%20studies%20report_%20June%202022.pdf
- ICVA. (2023, February 23). *Measuring Humanitarian Localisation in Yemen - Baseline Report - ICVA*. <https://www.icvanetwork.org/resource/measuring-humanitarian-localisation-in-yemen-baseline-report/>
- JIPS. (2019, March 27). *The Grand Bargain - A Shared Commitment to Better Serve People In Need (2016) - JIPS - Joint IDP Profiling Service*. JIPS - Joint IDP Profiling Service. <https://www.jips.org/jips-publication/the-grand-bargain-a-shared-commitment-to-better-serve-people-in-need-2016/>
- Jørgensen, M., & Phillips, L. (2002). *Discourse Analysis as Theory and method*. <https://doi.org/10.4135/9781849208871>
- McEwan, C. (2018). Postcolonialism, decoloniality and development. In *Routledge eBooks*. <https://doi.org/10.4324/9781315178363>
- Moreno, S. E. C., & Duque, J. a. P. (2021). Empoderamiento femenino y asociaciones productivas comunitarias: Una revisión sistemática de literatura. *Acta Colombiana De Psicología*, 25(1), 9–27. <https://doi.org/10.14718/acp.2022.25.1.2>
- Mosse, D. (2013). The Anthropology of International Development. *Annual Review of Anthropology*, 42, 227–246. <http://www.jstor.org/stable/43049300>
- NRC. (2020, May 27). *Toolkit for principled humanitarian action: Managing counterterrorism risks*. <https://www.nrc.no/toolkit/principled-humanitarian-action-managing-counterterrorism-risks>
- Pellissier, R. (2008). *Business Research Made Easy*. Juta & Co.
- Pellowska, D., & Fipp, J. (2024, July 12). *Localisation in practice II: Implementing Risk Sharing in humanitarian action - Centre for Humanitarian Action*. Centre for Humanitarian Action. <https://www.chaberlin.org/en/publications/localisation-in-practice-ii-implementing-risk-sharing-in-humanitarian-action/>
- Risk Sharing Platform. (2023). *Risk Sharing Framework - Enhancing the Impact of Humanitarian Action Through Improved Risk Sharing*. <https://interagencystandingcommittee.org/grand-bargain-official-website/risk-sharing-framework-0>
- Robillard, S., Atim, T., Maxwell, D. (2021). Localization: A “Landscape” Report. Boston, MA: Feinstein International Center, Tufts University. [Localization-FINAL-12.30.21.pdf](#)

- Roepstorff, K. (2019). A call for critical reflection on the localisation agenda in humanitarian action. *Third World Quarterly*, 41(2), 284–301.
<https://doi.org/10.1080/01436597.2019.1644160>
- AWSD. (2024). *Security incident data | Aid Worker Security Database*.
<https://www.aidworkersecurity.org/incidents/search?start=2024&detail=1&country=YE>
- Van Brabant, K. & Patel, S. (2018). *Localisation in Practice: Emerging indicators and practical recommendations*
https://resourcecentre.savethechildren.net/pdf/localisation_indicators_practical_recommendations_2018.pdf
- Yin, R. K. (2009). *Case study research: Design and methods* (4. ed.). Sage Publications.