LOST IN SUDANISATION?

What it means to apply a principled humanitarian approach in the response to the crisis in Sudan

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HERE-Geneva

Sudan INGO Forum

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This report highlights the formidable obstacles and limitations faced by humanitarian actors operating in Sudan. Highlighting these challenges, however, should not overshadow the extraordinary efforts of individuals and organisations providing humanitarian response on the ground – often under immense pressure in a highly complex and insecure environment. They deserve the utmost credit.

The opinions expressed in this document reflect those of the HERE-Geneva review team.

LOST IN SUDANISATION - WHAT IT MEANS TO APPLY A PRINCIPLED HUMANITARIAN APPROACH IN THE RESPONSE TO THE CRISIS IN SUDAN

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LIST OF ABBREVIATIONS

ERR	Emergency Response Room
HAC	Humanitarian Aid Commission
HC	humanitarian coordinator
HCT	Humanitarian Country Team
HRP	Humanitarian Response Plan
IAHE	Inter-Agency Humanitarian Evaluation
IASC	Inter-Agency Standing Committee
ICRC	International Committee of the Red Cross
IDP	internally displaced person
IHL	international humanitarian law
INGO	international non-governmental organisation
JOPs	Joint Operating Principles
MSF	Médecins Sans Frontières (Doctors Without Borders)
NNGO	national non-governmental organisation
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
OLS	Operation Lifeline Sudan
RSF	Rapid Support Forces
SARHO	Sudanese Agency for Relief and Humanitarian Operations
SAF	Sudanese Armed Forces
SPLM-United	Sudan People's Liberation Movement-United
UN	United Nations

EXECUTIVE SUMMARY

The war that broke out in Sudan's capital, Khartoum, on 15 April 2023, between the Sudanese Armed Forces (SAF) and the paramilitary Rapid Support Forces (RSF) has caused the world's largest humanitarian crisis. By the end of 2024, 30 million Sudanese – more than half of the country's population – required humanitarian assistance to survive. Going into its third year, the war continues to provoke starvation; widespread violence towards civilians; attacks on health facilities, markets, and schools; and massive conflict-related sexual violence. Security restrictions, deliberate obstacles to aid delivery, and bureaucratic and administrative impediments significantly hinder a humanitarian response. Historically, the term "Sudanisation" has been used to describe decolonisation efforts and to control and influence the international aid sector. The response now also faces an immediate and dramatic shortfall in resources due to the decisions taken by several donor governments in early 2025 to cut funding. Against this background, this report considers the ways in which international non-governmental organisations (INGOs) have navigated the challenging environment to support the Sudanese in their survival since the start of the war.

For a humanitarian response to be effective, it must be driven by certain values and principles that distinguish its motivation and purpose. The extent to which humanitarian organisations demonstrate these values and principles in their work may increase trust and acceptance by the parties to the conflict. These parties must, in turn, observe the applicable rules of international humanitarian law (IHL). With this in mind, we examined the extent to which international humanitarian NGOs identify themselves with the principles that underpin humanitarian action, the extent to which these principles help them in their choices and decisions, and whether and how they use the principles in their negotiations to gain access to the people most in need. Based on interviews with a wide range of individuals and organisations, as well as a review of various documents, this report highlights a number of **key findings**:

"The key to a more effective collective principled approach is not making everyone do the same thing. On the contrary, it is about recognising the added value and specific strengths of each actor"

1. The key to a more effective collective principled approach is not making everyone do the same thing. On the contrary, it is about recognising the added value and specific strengths of each actor (i.e. the UN, the Red Cross/Red Crescent, INGOs, national/local NGOs, and civil society community groups) and understanding how to achieve complementarity among their different approaches.

2. Humanitarian INGOs have a strong awareness of the four core humanitarian principles (humanity, neutrality, impartiality, and independence). However, they conceive of them primarily **as a theoretical framework**, which they feel does not necessarily help them to navigate the various operational challenges at a practical level.

3. A deeper collective dialogue on the definition of principled humanitarian action is missing. The principles are frequently used – implicitly or explicitly – to legitimise or delegitimise the approaches of others. For example, some believe that the humanitarian principles create an imperative

to work in RSF-held areas, while others feel that in keeping with the principles, they should not bow to the conditions placed on them to be able to work in these areas. Debates on such issues have become so polarised that they are neither constructive nor productive.

4. The principle of impartiality implies that, in determining priorities, INGOs and other humanitarian actors must consider which communities are most in need. This should be a collective consideration, looking at the whole of the country. However, in Sudan, if this evaluation has been made at all, it has been mostly limited to the areas in which organisations were already present. Importantly, few new organisations have started working in the country since the outbreak of the war, despite the announcement of a system-wide scale-up. The existing organisations, many of which have been established in the country for years, were relatively slow in understanding the new context and shifting from a 'nexus' approach towards an emergency response.

5. Much emphasis has been placed on (joint) red lines, i.e. thresholds that set limits as to what compromises organisations should accept. However, any debates about holding onto these thresholds were reactive rather than strategic, and when thresholds were not kept, the only step taken was to replace them with new ones. **Instead of focusing on red lines, organisations should focus on a framework for principled decision making.**

6. The UN's approach to leading and coordinating the collective humanitarian response in this crisis has been characterised by some serious limitations, which affected INGOs and other humanitarian actors. In recognising the SAF as the government of Sudan, the UN took a political stance in opposition to certain humanitarian principles. As a result, UN humanitarian agencies are seen as partisan, and have not been able to secure a position that allows them to gain full humanitarian access to non-SAF-held areas. **Instead of relying on the UN, several INGOs have realised that they need to invest in their own capacity to negotiate access.**

7. Justifiably or not, national and local NGOs have been viewed with suspicion for many years because of their affiliations with the Sudanese government. For years, if not decades, the government has imposed certain conditions on humanitarian work, many of which amount to manipulation or instrumentalisation. As it was difficult for international organisations to withstand this manipulation, it was at least as difficult for national and local NGOs to escape these pressures. It is extremely difficult to push back on these conditions now, but the armed conflict has created an **opportunity to remind the government to abide by its obligations under international humanitarian law (IHL).**

8. A specifically valuable role in the humanitarian response to the Sudan crisis has been played by **the Emergency Response Rooms (ERRs)** – community support groups emerging from the civil society movement and the resistance committees that have pushed for democracy in the country since 2019. Working effectively with these ERRs requires that the international community take a different approach from the standard contractual implementing partner arrangement. **These groups have much to offer in a collective dialogue of principled action in Sudan in terms of explaining their understanding and approach towards humanitarianism.**

9. Collective dialogues on humanitarian principles, which, critically, should underpin a humanitarian strategy, have largely failed so far. The Joint Operating Principles (JOPs) established by the Humanitarian Country Team (HCT) have been of little added value, as there has been little to no follow-up, let alone action taken when agencies deviated from these principles.

10. The INGO Forum has a leadership role to play in providing a platform for collective dialogue on principles and strategy among INGOs. In many ways, it is forced to compensate for the limitations that the UN and the HCT are facing. In pursuit of a networked humanitarian community instead of one led by an HC/HCT, the INGO Forum could become the main platform for dialogue on humanitarian principles, strategy, and complementarity among the various humanitarian actors.

The sector is currently overwhelmed by the consequences of the funding shortage. Organisations are grappling with a severe resource shortage, and it appears that the planned Inter-Agency Humanitarian Evaluation (IAHE) of the response in Sudan has been put on hold. This should not be taken as an excuse not to think constructively about what lessons are there to be learnt. In fact, the way the Sudan response adapts to the new reality may even inform the larger future of the humanitarian sector. There is an opportunity to provide a template for how various humanitarian actors can work towards complementarity by communicating around their different approaches and understanding how the actions of one may have implications for another. The alternative is an inefficient, fragmented response, where each actor continues to work towards their individual targets rather than towards collective outcomes.

"There is an opportunity to provide a template for how various humanitarian actors can work towards complementarity"

I. INTRODUCTION

As the war between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF), which erupted on 15 April 2023, enters its third year, Sudan faces a severe humanitarian crisis. About 30 million people currently require humanitarian assistance and support, with needs escalating. Half of the population faces food insecurity. More than 12 million people have fled their homes since the conflict started, seeking refuge within Sudan or in neighbouring countries.[1]

Sudan presents a highly complicated environment for delivering principled humanitarian response to people in need. Humanitarian organisations are required to navigate a myriad of interests and challenges, while the warring parties show little respect for international human rights and humanitarian norms.[2] Due to security restrictions, deliberate obstacles to aid delivery, and bureaucratic and administrative impediments, humanitarian actors have been faced with major constraints in accessing crisis-affected communities and addressing needs at scale throughout the country.

It is in this environment that the Sudan INGO Forum[3] and the INGO community are engaging in a collective reflection on what it means to respond in a principled manner in the context of Sudan. As seen in other contexts like Iraq,[4] Yemen,[5] and Afghanistan,[6] humanitarian principles are an essential element behind the effectiveness of the humanitarian response. The four core humanitarian principles (humanity, impartiality, neutrality, and independence)[7] play a major role in engaging with warring parties, negotiating access, and supporting local civil society groups. While these principles serve to distinguish humanitarian aid from other forms of relief and provide a framework for humanitarian agencies to navigate ethical dilemmas,[8] the application of the principles cannot be taken for granted.

1 OCHA, 'Sudan Crisis - Key Facts and Figures as of 23 January 2025', 23 January 2025.

2 See UN Human Rights Council, 'Report of the Independent International Fact-Finding Mission for the Sudan (A/HRC/57/23)', 5 September 2024.

3 The Sudan INGO Forum is the coordination and representation body for the INGO community in Sudan. The Forum is currently comprised of 70 members and observer members providing humanitarian and development assistance and peacebuilding interventions across all 18 states of Sudan.

4 Ed Schenkenberg and Karin Wendt, 'Principled Humanitarian Assistance of ECHO Partners in Iraq' (NRC & HERE-Geneva, 2017).

5 Marzia Montemurro and Karin Wendt, 'Principled Humanitarian Programming in Yemen - a "Prisoner's Dilemma"?', December 2021.

6 DRC, 'Principled Humanitarian Action in Afghanistan', May 2023.

7 The four core principles find their origin in the Fundamental Principles of the International Red Cross and Red Crescent Movement, proclaimed in Vienna in 1965 by the 20th International Conference of the Red Cross and Red Crescent Movement. For NGOs, the principles are laid down in the 1994 Code of Conduct for the Red Cross and Red Crescent Movement and NGOs. Over 600 organisations worldwide have also signed up to them through the Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organisations (NGOs) in Disaster Relief, which includes the principles of humanity, impartiality, independence, and neutrality in its first four core principles.

8 Nigel Timmins and Manisha Thomas, 'No Easy Choice: A Humanitarian's Guide to Ethical, Principled Decision Making' (Humanitarian Outcomes & United Kingdom Humanitarian Innovation Hub, 2025); Jan Egeland, Adele Harmer, and Abby Stoddard, 'Good Practice for Humanitarians in Complex Security Environments', 2011, 105; FDFA, UN OCHA, and CDI, 'Humanitarian Access in Situations of Armed Conflict - Practitioner's Manual', 2014; Hugo Slim, Humanitarian Ethics: A Guide to the Morality of Aid in War and Disaster (Hurst & Co. London, 2015); C Magone, M Neuman, and F Weissman, 'Humanitarian Negotiations Revealed: The MSF Experience' (Centre de Réflexion sur l'Action et les Savoirs Humanitaires, C. Hurst & Co. Ltd., 2012); Katherine Haver and W Carter, 'What It Takes: Principled Pragmatism to Enable Access and Quality Humanitarian Aid in Insecure Environments', Report from the Secure Access in Volatile Environments Research Programme: SAVEresearch.net. (Humanitarian Outcomes, 2016).

The delivery of humanitarian aid in complex environments is, by nature, a balancing act between often competing priorities. Because of the interdependence that exists among humanitarian organisations, continuous exchange and mutual learning on what works well and less well are prerequisites to addressing the individual and collective challenges to principled humanitarian action. Reflection and analysis of the trade-offs and results should inform these coordination efforts.

It is with this aim that HERE-Geneva, together with the INGO Forum and with the support of NRC, developed this study. Carried out between October 2024 and February 2025, the purpose of the research behind this report has been to examine the ways that INGOs have responded to the crisis since April 2023, and to **provide suggestions that can feed into the collective reflection on how the INGO community can adjust their approaches to ensure a principled humanitarian response, ultimately benefitting those most in need.**

The rest of this introduction will provide a detailed examination of the research undertaken and the context informing the humanitarian response in Sudan. The sections that follow will discuss the findings of this review, looking in turn at the five main areas of focus for the research. Section II will examine how INGOs approach the humanitarian principles in Sudan and, in doing so, highlight a number of disagreements about the meaning and scope of the principles, where a more nuanced approach could help de-polarise the debate. Section III then turns to three specific areas that raise very practical questions with regard to the principles – namely, (a) the duty to scale up operations and related issues around impartiality; (b) neutrality and independence regarding the relationship with the UN; and (c) neutrality when engaging with Sudanese civil society actors. A fourth section looks at how to collectively preserve humanitarian space. Finally, the conclusion emphasises the importance of strategically leveraging comparative advantages.

"The delivery of humanitarian aid in complex environments is, by nature, a balancing act between often competing priorities"

a. Scope and approach

The approach taken for this review has been largely inspired by previous pieces of similar research undertaken by HERE,[9] but has focused on INGOs as the unit of analysis and looked at a larger number of organisations as part of the sample. This allowed for a broad approach aiming primarily to shed light on the approaches of INGOs in Sudan as a collective. In doing so, it was agreed with the Sudan INGO Forum Steering Committee in the inception phase to look more specifically at five aspects:

1. INGOs and humanitarian principles;
2. INGO operational approaches, and the challenges and opportunities for scaling up and expanding the humanitarian response;
3. INGOs, UN positioning, and the interdependence of the humanitarian system;
4. INGOs and their engagement with Sudanese aid actors; and
5. INGOs and the preservation of an operational humanitarian space.

9 See Schenkenberg and Wendt, 'Principled Humanitarian Assistance of ECHO Partners in Iraq'; Montemurro and Wendt, 'Principled Humanitarian Programming in Yemen - a "Prisoner's Dilemma"?'.

While the first aspect involves a general reflection on how various INGOs in Sudan conceive of the humanitarian principles, the four subsequent aspects cover key issues faced by the INGO community, in which practical questions around the operationalisation of humanitarian principles are particularly pronounced. An overview of the main lines of inquiry that were explored during the research phase for each of the five aspects can be found in Annex 1.

This review is not an evaluation of INGO responses in Sudan, and it does not seek to assess the ability of particular INGOs to uphold the principles, nor the effectiveness and efficiency of the response as a whole. Rather, the review considers a group of INGOs as an aggregate set, highlighting common issues and concerns relating to what it means to provide a principled humanitarian response in Sudan, and offering avenues for reflection and suggestions that hopefully can help INGOs refine and adapt their strategies going forward.

Methods

This report draws on qualitative research, including semi-structured interviews with key informants, a literature review, and a sense-making workshop.

The research team conducted **53 remote, semi-structured interviews with 64 key informants**, following the lines of inquiry provided in Annex 1. The key informants were:

- 32 INGO representatives (mainly country directors), from a total of 25 different INGOs implementing humanitarian operations in Sudan, all members or observers of the INGO Forum;
- 2 representatives of the Sudan INGO Forum;
- 5 representatives from the senior leadership of Sudanese non-governmental aid organisations;
- 6 donor representatives;
- 6 representatives of UN senior leadership; and
- 13 independent consultants or representatives from academia/think tanks with expertise in humanitarian aid in Sudan.

The series of interviews was complemented by a **literature review** covering publicly available secondary articles and reports focusing on Sudan. A document analysis of Humanitarian Country Team (HCT) meeting minutes from 2024 was also carried out. It should be noted that access to internal documents – whether from individual INGOs or collective forums – was limited. This constraint made it challenging to cross-reference and further substantiate some of the trends identified through the interviews conducted.

Additionally, a **sense-making workshop** was held in February 2025, bringing together 14 representatives from 12 INGOs operating in Sudan to discuss and gather further inputs on the initial findings of the review.

b. The Sudanese humanitarian context

Humanitarian approaches are highly dependent on contextual elements; therefore, before delving into the findings of this review, it is important to provide a brief overview of the context humanitarian INGOs find themselves confronted with in Sudan.

The conflict

The power struggle between the SAF and RSF intensified following a military coup in 2021, with war breaking out on 15 April 2023. The 2021 coup, staged by the military, halted a civilian transition towards democracy that had begun in 2019, after decades of rule under Omar al-Bashir. Disputes over the integration of RSF forces into the regular Sudanese army, alongside competition for control over resources and political power, have further fuelled the conflict. Initially concentrated in Khartoum, the fighting quickly spread across the country, with both parties consolidating territorial control and forging alliances with local armed groups. The most heavily affected regions include Khartoum State, Al Jazirah, Darfur, and Kordofan. As the conflict becomes increasingly protracted, concerns are growing over the potential fragmentation of the country.[10]

Figure 1: Map of Sudan (source: OCHA, Sudan Crisis – Key Facts and Figures, as of 07 March 2025)

Humanitarian needs

The ongoing conflict has created one of the world's largest humanitarian crises,[11] with widespread violence, displacement, and destruction. As of early 2025, an estimated 30.4 million people – over half the population – require humanitarian aid, and among them, 16 million are children.[12] Over 12 million people have been displaced, including 8.8 million internally displaced persons (IDPs) and 3 million refugees who have fled to neighbouring countries such as Chad, Egypt, and South Sudan.[13] The Independent International Fact-Finding Mission for the Sudan, established by the UN Human Rights Council on 11 October 2023, found that the parties to the conflict have committed war crimes and crimes against humanity,[14] and the protection risks are highly significant. Humanitarian needs are most acute in areas such as Darfur, South Kordofan, Blue Nile, Khartoum State, and Al Jazirah, where ongoing violence coupled with limited access to basic services has exacerbated malnutrition and caused dire health conditions. Unprecedented levels of acute food insecurity have also been

10 See e.g. Crisis Group's dedicated work on Sudan, International Crisis Group, ed., 'Sudan I Crisis Group', CrisisWatch 2024 – October Trends and November Alerts: Sudan, 2024., and ACAPS, 'Sudan Scenarios: A Region-by-Region Analysis of Possible Developments Affecting Humanitarian Needs and Operations in Sudan until December 2025', October 2024.

11 International Crisis Group, 'Sudan's Calamitous War: Finding a Path toward Peace', Crisis Group Africa Briefing, no. 204 (21 January 2025): 19.

12 OCHA, 'Sudan Humanitarian Needs and Response Plan 2025 - Executive Summary', December 2024.

13 OCHA, 'Sudan Humanitarian Needs'.

14 See UN Human Rights Council, 'Report of the Independent International Fact-Finding Mission for the Sudan (A/HRC/57/23)'.

recorded, with famine conditions reported in parts of North Darfur and millions of people at immediate risk of famine, especially in the conflict-affected areas of Darfur, Khartoum, and Kordofan.[15]

In 2023 and 2024, the Humanitarian Response Plans for Sudan were funded at 52% and 68%, respectively, with approximately USD 2,600 million requested for each of these years.[16] The 2025 HRP for Sudan requests the significant amount of USD 4,162.5 million, of which only 7%, or USD 275.8 million, has so far been secured. The pause in US foreign development assistance introduced in January 2025, which includes stop-work orders for humanitarian aid, has severely affected the humanitarian response in Sudan. The US was the country's largest humanitarian donor in 2024, providing nearly 44% of all humanitarian funding, including funding for food security, nutrition, multisector response, health, and WASH (water, sanitation, and hygiene).[17]

Restrictions facing the humanitarian community

Sudan has been the recipient of humanitarian responses for decades. Even if the current context involves a different configuration of the parties to the conflict, authorities have long-standing experience in controlling and manipulating humanitarian aid. Since its creation in 1985, the Humanitarian Aid Commission (HAC), the body that manages and organises all humanitarian aid in the country on behalf of the Sudanese authorities, has subjected aid agencies to bureaucratic obstacles and restrictive policies – to such an extent that these restrictions are now taken for granted. Historically, the term "Sudanisation" has been used to describe decolonisation efforts and to control and influence the international aid sector. It came to a head in 2009 when the government began to require that at least part of the humanitarian response be implemented through national partners, including through government institutions.[18]

"Historically, the term "Sudanisation" has been used to describe decolonisation efforts and to control and influence the international aid sector"

The Sudanese Revolution and the fall of the Bashir regime in 2019 introduced hope for a more collaborative relationship between humanitarian actors and the authorities,[19] but, looking back, one perspective is also that the humanitarian community was not fast enough to take steps that would have solidified changed policies or practices of the civilian authorities towards humanitarian organisations. The coup in October 2021, and even more so with the outbreak of war in April 2023, meant major steps backwards. As part of its effort to seek legitimacy, the RSF created the Sudan Agency for Relief and Humanitarian Operations (SARHO), a body similar to the HAC, to control humanitarian operations in RSF-held territory. Currently, the various parties to the conflict all seek to control humanitarian aid for their own strategic objectives.

In 2024, more than 70% of humanitarian INGOs in Sudan reported severe access

15 OCHA, 'Sudan Humanitarian Needs'.

16 In 2023, USD 1,321.7 million of the USD 2,565.2 million requested was received. In 2024, USD 1,818.7 million of the USD 2,695.7 million requested was received. See https://fts.unocha.org/countries/212/summary/2025.

17 ACAPS, 'ACAPS Thematic Report: Sudan - Implications of the US AID Funding Cuts', 13 March 2025.

18 CSF, 'Making Sense of "Localisation" in Sudan', 7.

19 See, for instance, the Sudan Humanitarian Response Plans of 2020, 2021, 2022.

constraints, with over 40% having faced incidents of movement restrictions and permit delays or denials, significantly affecting their humanitarian operations.[20] To make matters worse, Sudan is no stranger to climate change-related shocks, including droughts and floods. Heavy seasonal rains in July and August 2024, for example, caused further population displacement and reduced humanitarian access in the eastern and western parts of the country.

Humanitarian engagement in Sudan

In this environment, the UN-led coordination system, which traditionally provides critical coordination, logistical, security, and access support for the humanitarian community, has been severely constrained, as the ability of UN agencies to operate in Sudan, and even more so in non-SAF areas, is particularly limited. The UN's operational positioning in Sudan is tied to its agreements with Member States, and it operates only by invitation and with the authorisation of the recognised government. The Sudanese authorities that came to power through the coup before the war remain the officially recognised Member State representative at the UN headquarters in New York. In the minds of several, this recognition restricts the UN from working in the country and across its borders without explicit permission from what they have recognised as the official government, unless mandated by the UN Security Council. While the UN's permission to deploy operations at scale throughout the country and deploy responses through cross-border operations is significantly limited by the Sudanese authorities, the Security Council itself has not passed any meaningful resolution that would give the UN in Sudan greater capacity to act.[21]

Despite these shared constraints, INGOs navigate the complexity of the Sudan context in various ways, reflecting their diversity. In this landscape, the Sudan NGO Forum plays a central role in promoting dialogue and information-sharing among members, representing INGOs in collective humanitarian forums such as the HCT, and enabling coordinated positioning across the community. Additionally, the Forum has taken an active role in engaging with parties to the conflict and their respective humanitarian bodies.

A particular feature of the humanitarian efforts in Sudan is the local networks of first responders – comprising civil society groups; informal mutual aid initiatives; and community, faith-based, youth, women, and elderly-led organisations. Many of the individuals composing these groups are directly affected by the crisis themselves, yet they continue to provide essential support. The so-called Emergency Response Rooms (ERRs) play an essential role, although the majority are not registered as formal organisations. The ERRs started as WhatsApp groups (the 'rooms'), mobilising citizen participation in the peaceful demonstrations that led to the overthrow of the Bashir regime in 2019. At the start of the war in April 2023, these groups shared information on the situation in Khartoum and elsewhere, helping civilians to seek safety.

"A particular feature of the humanitarian efforts in Sudan is the local networks of first responders"

20 Sudan INGO Forum, 'Sudan INGO Forum – Priorities for the Sudan Crisis 2025', February 2025.

21 For further reflection on the topic of UN positioning with regard to recognised governments and de facto authorities, see, for example, Lilly Damian, 'Does the UN Need a More Coherent Approach Toward "De Facto" Authorities?', 6 January 2023.

Since then, the ERRs have become a primary provider of humanitarian assistance across Sudan.[22]

The ERRs are highly decentralised initiatives, comprising over 700 groups spread across Sudan, each connecting through a structured coordination system that links local service delivery to regional and national councils.[23] As of February 2024, they have reached over four million people, offering services such as evacuations from conflict zones, operating community kitchens, distributing clean water and medical supplies, and maintaining critical infrastructure, including water and communication systems.[24] In many instances, they provided a lifeline where no international aid group could, even while faced with communication blackouts, restrictions in access, and other extreme operational risks.

II. INGOs AND THE HUMANITARIAN PRINCIPLES IN SUDAN

The INGO community in Sudan is fully aware of the political environment in which their action takes place, how their presence and operations are used and manipulated by parties to the conflict, and what important – but limited – ground they have to push back. In this context, INGO representatives largely see the principles as an ethical framework or moral compass. They essentially serve as a tool to position themselves as credible and bona fide actors, and to advocate against political entanglements with the parties to the conflict. This is exactly what the principles are for: helping humanitarian organisations assert their identity.

"The principles are not simply an identity marker; they have a highly practical dimension that appears to go unrecognised within the INGO community in Sudan"

However, the relevance of a principled approach to delivering a humanitarian response goes beyond a theoretical framework. The principles are not simply an identity marker; they have a highly practical dimension that appears to go unrecognised within the INGO community in Sudan. While most INGO representatives demonstrate significant familiarity with the humanitarian principles and claim to use them in negotiations with parties to the conflict, they approach them in very general terms. The four humanitarian principles are largely taken together as a theoretical or ethical concept, frequently positioned in opposition to pragmatism and the realities of implementation on the ground. Indeed, a large number of INGO representatives explain the context is such that it is impossible to have a fully principled response in Sudan. As three respondents explained:

> "I don't think it's feasible, given the context, to have a fully principled response if you want to be able to deliver."

> "If you want to get really stringent on humanitarian principles, in the end you won't be able to do anything."

> "We need to adapt a bit more to what's going on the ground, instead of having these very highbrow ethical principles, which are not always very useful in day-to-day activities."

22 Shabaka, 'Protecting First Responders: Challenges and Recommendations', 8 August 2024, https://shabaka.org/protecting-first-responders-challenges-and-recommendations/.

23 Mark Leon Goldberg, 'Sudan's "Emergency Response Rooms" Show the Future of Humanitarian Aid', ed. Global Dispatches, 15 October 2024.

24 OCHA, 'Youth-Led "Emergency Rooms" Shine Rays of Hope in War-Torn Sudan', 3 February 2024, https://news.un.org/en/story/2024/02/1146187.

Not only has this blanket approach to the principles led to a significant degree of confusion with regard to their content and meaning, but it has also meant that the debate within the INGO community as to what their implementation involves has become highly polarised. The humanitarian principles are often used – implicitly or explicitly – to legitimise or delegitimise the approaches of other organisations, and sometimes methods within the same organisation. They often serve as the ultimate moral argument to challenge others' positioning. Unpacking each of the four principles and considering them in terms of their constituent elements will allow the INGO community to step away from the currently polarised debate and have a more constructive dialogue around their implementation – ultimately leading to better decision-making.

a. The need to unpack the principles

As highlighted in previous research on this subject,[25] the humanitarian principles are an ideal to work towards, and compromises are unavoidable. The situation is not black and white: decisions are not clearly 'right' or 'wrong,' and what is important is being clear, open, and transparent on how the principles have been considered for each decision taken. Being clear on how the principles have been weighed into decision-making in turn means that they cannot be approached as a group or as a theoretical concept. Rather, it is important to consider each of the four principles in terms of its own highly practical implications. In fact, the opposite of a principled approach is not a pragmatic one;[26] on the contrary, in their role as a moral compass, the principles have a highly pragmatic function. The principles of humanity and impartiality provide two examples.

"The opposite of a principled approach is not a pragmatic one"

The principle of humanity and the humanitarian imperative

Similar to what HERE has seen in other contexts, instead of referring to the principle of humanity, many interviewees in Sudan referred to the humanitarian imperative,[27] and saw it as additional to the concept of the humanitarian principles. Several of them also emphasised that the humanitarian imperative comes before all other motivations, even viewing a strict adherence to the principles of impartiality, neutrality, and independence as possibly compromising the humanitarian imperative. They see the imperative as superior. In the words of one interviewee, "In this type of context, we need to understand that the humanitarian imperative overrides all of the other humanitarian principles, especially given the level of need and challenges we face." In reaction to this, some felt that the imperative was invoked in this way when it felt suitable justifying certain compromises such as payments and left aside in other instances.

The insistence on the humanitarian imperative carries complications.[28] International humanitarian law is built on the premise

25 Schenkenberg and Wendt, 'Principled Humanitarian Assistance of ECHO Partners in Iraq'; Montemurro and Wendt, 'Principled Humanitarian Programming in Yemen - a "Prisoner's Dilemma"?'.

26 The opposite of a principled approach is an unprincipled approach, meaning an approach that is not underpinned by any principles

27 This has been a source of confusion ever since the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief referred to the 'humanitarian imperative' (see Principle 1) instead of the principle of humanity.

28 See Slim, H., 'Claiming a Humanitarian Imperative: NGOs and the Cultivation of Humanitarian Duty', Refugee Survey Quarterly, 2002.

that humanitarian presence and access are subject to negotiations. Warring parties are allowed to balance military necessity with humanitarian considerations. In other words, legally, the imperative is not absolute. Morally, however, the imperative is understood as an obligation, certainly on the part of humanitarian organisations, to take action to prevent or alleviate human suffering wherever it is found. It is telling that it is especially INGOs working in RSF-held territory who referred to the imperative as a 'moral appeal' to their colleagues who are hesitating to expand their presence to these areas. In essence, this suggests that there needs to be a deeper collective dialogue on what it means to deliver principled action in Sudan.

The confusion with regard to the principle of humanity was also seen, as respondents noted concepts such as do no harm, the duty of care, and the need to consider the outcomes of one's presence and work as ethical considerations which are additional to the humanitarian principles, instead of being part of them. However, consideration of these aspects would fall squarely in the middle of a principled approach. Essentially, the principle of 'do no harm' is complementary to a key aspect of the principle of humanity, which calls on humanitarian actors to prevent and alleviate human suffering wherever it may be found.[29] Similarly, the duty of care and the consideration of outcomes align with impartiality in that operations aim to be non-discriminatory, proportional, and needs-based. The idea of considering all these elements as part of a principled approach may appear semantic, but it is important to emphasise that the principle of humanity is not negated by these other concerns.

Impartiality and proportionality

On an individual level, understandably, INGOs consider a wide range of factors other than the principles when making strategic decisions and defining their approaches. For example, when the war broke out in April 2023, many of them evacuated their staff and left their offices. As seen in the research conducted for this report, when it came to re-establishing operations, key considerations were previous experience and capacity. In fact, the research team heard that the primary concern for many INGOs was, and remains, preserving their presence in areas where they used to work prior to the conflict. This makes sense, but it is important not to forget the humanitarian obligation to deliver assistance to those in most urgent need first. This concept, known as proportionality, is a key aspect of the principle of impartiality.

Similar to what was previously seen in Yemen, it appears that prioritising those most in need is considered by a majority of INGOs in Sudan as a secondary step, after starting in the areas where INGOs are already operating. It is essential to consider impartiality at a country-wide level and prioritise those most in need. This does not mean that INGOs who implement the principle of impartiality more at the local level where they work are automatically unprincipled. However, the element of proportionality indicates that organisations should consider their position

"The element of proportionality indicates that organisations should consider their position as part of the wider collective response"

29 Jean Martial Bonis Charancle and Elena Lucchi, 'Incorporating the Principle of "Do No Harm": How to Take Action Without Causing Harm: Reflections on a Review of Humanity & Inclusion's Practices' (Humanity & Inclusion, 2018). See also https://emergency.unhcr.org/protection/protection-principles/humanitarian-principles and ICRC, 'The Fundamental Principles of the International Red Cross and Red Crescent Movement', n.d.

as part of the wider collective response, and communicate clearly to others to ensure that the collective endeavour is guided by all aspects of the principle of impartiality. The extent to which this has happened during the collective response, including the system-wide scale-up, will be further examined below.

b. The need to weigh decisions

As part of any dialogue around what it means to provide a principled response, it is important to see the four core principles a part of a framework that helps agencies weigh their decisions. Negotiating or maintaining a humanitarian presence may come at a cost in terms of having to accept authorities' conditions, which in fact constitute undue interference. The principle of independence carries a responsibility on the part of the organisation to consider what undue conditions they should reject. Illustrating the dilemma that comes from an unclear institutional position on what the principles mean and how they should be used, one INGO representative explained:

> "My HQ say 'you have to play the game and stay as neutral as possible' instead of scaling up in Darfur as I push for. Their argument is that we don't know the outcome, but it's shortsighted. My view is that currently there's a huge imbalance of where the needs are and where there is a humanitarian response. So HQ and I are referring to neutrality in different ways. And we haven't been told 'we are kicking you out because you work in the other part.' We haven't had problems. But we are ready to go all the way to PNG. We are aware it can have consequences. My biggest concern is if the government orders you to work either here or there. It has not happened as such yet."

As in any other context, Sudan's operational environment demands trade-offs, many of which carry significant uncertainty and moral complexity. This is not made easier by the lack of institutional knowledge. Many interviewees pointed out that the humanitarian community has been notably ineffective at tracking the history of negotiations and compromises made over decades of presence in Sudan. There is a lack of long-term documentation and analysis of past efforts, and no comprehensive study examining the tactics and strategies used by authorities to manipulate and control aid. Additionally, the high turnover of staff further exacerbates this absence of historical perspective. Better collective documentation around decisions made, and compromises that have been deemed necessary would undoubtedly help the humanitarian community navigate the context in Sudan in a coherent and strategic manner.

"It is important to see the four core principles a part of a framework that helps agencies weigh their decisions"

The research behind this report heard organisations referring to the principles to justify their choices after they were made. Again, this makes sense but carries limitations. Referring to humanitarian principles post-factum provides for a certain degree of accountability as it allows for organisations to explain what considerations they took into account and how they factored in the principles. However, it will enhance transparency and likely serve complementarity if organisations clarify their understanding of the principles in an earlier stage. The fact that, in a diverse community, there are differences of view on the principles cannot be a surprise to anyone. However, what matters is understanding these differences and considering the implications, which can be either positive or negative.

c. The polarisation of the debate

Looking further at the collective level, the review noted significant differences in how representatives from different INGOs approach the humanitarian principles, and tensions in terms of how they relate to each other regarding these differences.

The case-by-case debate on 'red lines'

Interviewees emphasised that they found that discussions within the humanitarian community about principles and engagement with the parties to the conflict too often come to focus on 'red lines' – i.e. what can be accepted and what must be refused in negotiating an operational humanitarian space. Hardly any of the INGO representatives interviewed for this review reported having any formal or informal 'red-line policy' within their organisation for Sudan, nor is there any collective guidance on the topic. Red lines are debated on a case-by-case basis: today, the issue may be whether to register with SARHO; tomorrow, whether to pay taxes to SARHO. Addressing red lines on an ad hoc basis often results in continually crossing the very boundaries that were initially set. In the context of Sudan, defining red lines inevitably seems to lead to their gradual erosion and the establishment of new ones. In addition, focusing on red-lines in negotiations effectively limits the space in these negotiations. Instead of this focus, organisations should focus more on a framework for principled decision making.

Neutrality and registration with SARHO

In the words of one interviewee: "The discussion on humanitarian principles creates tensions within the community, especially around registration with SARHO." A large group of INGO representatives argue that the four core principles are insufficiently understood by their fellow organisations, on the grounds that these latter organisations are perceived as 'not doing enough' in terms of scaling up or making an effort to work in non-SAF-held areas. In their minds, the principles carry a duty to pursue engagement and negotiation with the RSF and its humanitarian wing, SARHO. As put by one INGO representative, "From a principled perspective, we decided we wanted to make sure we were operating on both sides of the line." By contrast, others justify their reluctance to engage and negotiate with SARHO out of fear that they may risk compromising their neutrality and independence in the long term, given SARHO's list of conditions. This list appears to have reduced somewhat, recently. Fears for reprisals from the SAF side for engagement with the RSF may be a factor, too.

It is telling that the principles come up often in the context of negotiations with the RSF/SARHO, but not when talking about the HAC. This uneven focus is especially reflected in the September 2024 position paper on engagement with SARHO, produced by the Sudan Humanitarian Access Working Group. The annex to this paper notes a range of risks involved in the engagement with SARHO, including, for example, that it "instrumentalises humanitarian aid for political or military purposes." Clearly, not extending such a risk to the HAC has very significant implications for how the UN, and by extension, their partners, are viewed by the RSF. Notably, organisations that work in RSF-held territory have different

"It is telling that the principles come up often in the context of negotiations with the RSF/SARHO, but not when talking about the HAC"

views on whether they should explain their work in these areas with the SAF and HAC. Several of them do so to ensure they are transparent on their operations in Sudan. Some also seek formal authorisation, request official Sudanese visas, and inform the HAC about activities in those locations. Others do not, deciding that working in RSF-held territory only requires authorisation from the RSF/SARHO.

None of the INGOs interviewed reported having (re)negotiated the conditions of their registration with the HAC since the outbreak of the war. Presumably, this is because the opportunity to (re-)negotiate operational space with the HAC is seen as non-existent due to the compromises agreed upon for decades. That said, issues of principle came up in discussions in the INGO Forum about payments to HAC. Within the frame of the INGO Forum, there were several attempts to collectively negotiate with HAC, but these efforts were often concerned with small issues and, therefore, somewhat misaligned in terms of the changes needed. Importantly also, as noted in the 2023 SCORE report on Sudan, HAC capacities at federal levels have fragmented since the start of the conflict, resulting in more powerful state-level HACs implementing more restrictive measures, ultimately making access negotiations even more difficult.[30]

While this reality cannot be ignored, it also overlooks the legal framework embedded in IHL. The SAF, and, by extension, the HAC, are parties to the armed conflict. Even if they represent the government of Sudan, as the UN has determined, their obligations to observe the rules of war (in this case, a non-international armed conflict[31]) are identical to the obligations of the RSF. In other words, for humanitarian organisations to be even-handed in their negotiations with the various parties, the thresholds for accepting compromises from either of these parties should be similar. This is not to say that they should go for a lower threshold with SARHO to be on the same level as the HAC. Rather, where possible, they should consider re-negotiating with the HAC.

"A deeper reflection on the humanitarian principles would benefit from moving beyond the red-line debate to a broader, more strategic dimension"

A need for a space for more productive exchanges

The differences of views among INGOs on how the principles should be understood have resulted in an atmosphere that some interviewees described as increasingly polarised. Clearly, such an atmosphere, if it exists, is not conducive to open and frank conversations on what it entails to follow a principled approach. A deeper reflection on the humanitarian principles would benefit from moving beyond the red-line debate to a broader, more strategic dimension. It follows that INGOs should aim to create a climate that fosters more productive exchanges. Rather than fuelling divisions, humanitarian principles should serve as a foundation for meaningful discussion, collective reflection, and potential agreement on fundamental positions.

30 Humanitarian Outcomes, ed., 'Humanitarian Access SCORE Report: Sudan - Survey on the Coverage, Operational Reach, and Effectiveness of Humanitarian Aid', 20 December 2023, 11

31 See https://www.geneva-academy.ch/news/detail/622-rulac-classifies-a-new-non-international-armed-conflict-in-sudan.

"Arriving at a better understanding of the diversity will serve complementarity"

For effective discussions on principled action, where actors can learn from each other's different understandings, a safe space is needed. Agencies feel exposed and vulnerable when they disclose the compromises they have made. Even the word 'compromise' can be seen as sensitive, as it bears a negative connotation.[32] The principles can also have an 'identity function' to demarcate who is humanitarian and who is not, which is further evidence of the necessity of a safe space.[33]

The debate on whether the principles are inclusive in their nature or exclude certain actors is far from new. Calls for adding other principles, such as the principle of solidarity or accountability, to the four traditional principles continue to be made. What this all means is that there is an urgent need for inter-agency dialogue. Because of the diversity of actors and approaches in the humanitarian sphere in Sudan, INGOs should be transparent towards each other on how they understand principled action and what principles they follow. The issue is not the fact that differences exist; the issue is that INGOs use the same principles to justify opposing decisions. In addition, arriving at a better understanding of the diversity will serve complementarity. Not every humanitarian actor is expected to set the same priorities and be present in the same area. Part of this process is also to ensure space for community-led and grassroots initiatives to express their motivations and objectives. This is particularly relevant in relation to volunteer mutual aid groups, such as the Emergency Response Rooms (see below), and diaspora-led support initiatives.

32 As seen in one such conversation held elsewhere, outside of Sudan.

33 See for instance: Trumanitarian, 'The Humanitarian Club - Members Only!', n.d., https://trumanitarian.org/captivate-podcast/94-members-only/. Michael Barnett, 'The Humanitarian Club: Hierarchy, Networks and Exclusion', in Global Governance in a World of Change, vol. 2021, 5 (Cambridge University Press, 2021).

KEY TAKE AWAYS

- **Humanitarian INGOs have a strong awareness of the four core humanitarian principles** (humanity, neutrality, impartiality, and independence). However, they conceive of them **primarily as a theoretical framework,** which they feel does not necessarily help them to navigate the various operational challenges at a practical level.

- **A deeper collective dialogue on the definition of principled humanitarian action is missing.** The principles are frequently used – implicitly or explicitly – to legitimise or delegitimise the approaches of others. For example, some believe that the humanitarian principles create an imperative to work in RSF-held areas, while others feel that in keeping with the principles, they should not bow to the conditions placed on them to be able to work in these areas. Debates on such issues have become so polarised that they are neither constructive nor productive.

- **The principle of impartiality implies that, in determining priorities, INGOs and other humanitarian actors must consider which communities are most in need. This should be a collective consideration, looking at the whole of the country.** However, in Sudan, if this evaluation has been made at all, it has been mostly limited to the areas in which organisations were already present. Importantly, few new organisations have started working in the country since the outbreak of the war, despite the announcement of a system-wide scale-up. The existing **organisations, many of which have been established in the country for years, were relatively slow in understanding the new context and shifting from a 'nexus' approach towards an emergency response.**

- Much emphasis has been placed on (joint) red lines, i.e. thresholds that set limits as to what compromises organisations should accept. However, any debates about holding onto these thresholds were reactive rather than strategic, and when thresholds were not kept, the only step taken was to replace them with new ones. **Instead of focusing on red lines, organisations should focus on a framework for principled decision making.**

III. NAVIGATING DILEMMAS: THE PRINCIPLES AT PLAY

In addition to looking at the way in which INGOs approach the humanitarian principles more generally in Sudan, this research has aimed to consider three specific operational issues in light of the principles: challenges and opportunities around expansion and scale-up, UN positioning and the interdependence of the humanitarian system, and engagement with Sudanese aid actors.

a. Impartiality and the duty to scale up

On moral and principled grounds, humanitarian organisations have a duty to expand and scale up their efforts when a crisis escalates. Four months after the outbreak of the war in April 2023, the IASC decided to activate the protocol for a system-wide scale-up.[34] UN agencies and their partners were, from that point onwards, expected to mobilise their capacities to mount a collective response corresponding to the scale of the needs. But two years into the conflict, there is broad agreement that the system-wide scale-up and the overall response remains largely inadequate.

The lack of response in the areas with the most needs

This lack of successful expansion and scale-up can be explained as far as it concerns the early months of the conflict, since it was a chaotic period for all humanitarian actors. One interviewee explained, "Staff were traumatised [by what happened] in Khartoum." Another highlighted:

> "We were all directly affected when the conflict broke out; it was complete destabilisation, and difficult to get organised. For us, it took us quite a while."

Organisations needed time to stabilise, recalibrate, and adapt to the new situation: their staff and their families were affected by the war and many of them had to relocate to safer places. This reality in the immediate months following April 2023 cannot be underestimated, but it does not provide a full explanation for the failure to scale up.

One immediately obvious shortcoming is the lack of overall geographic coverage. Interviewees explained that INGOs have primarily concentrated their responses in SAF-controlled areas. This is seen in the relocation of many organisations from Khartoum to Port Sudan and to SAF-controlled regions where large concentrations of internally displaced persons (IDPs) are found. However, as noted, the principle of impartiality carries the duty to prioritise those most in need. As it is reasonable to assume a correlation between intense armed combat and humanitarian need, it should be areas such as Darfur, Khartoum State, Al Jazirah, Jebel Mara, and South Kordofan where scale-up efforts should focus first – but it is precisely in these locations where it has been largely insufficient.

When asked about the region of Darfur, interviewees commented on the small number of INGOs operating at scale throughout the region, including in non-SAF areas, estimating not more than a dozen. As one interviewee explained:

> "You have this small group of INGOs who are working cross-line, cross-border, without visas, operating in Darfur."

Another respondent added:

> "The INGO presence in South and East Darfur is minimal. I think many of the INGOs are looking at it from an operational perspective and want to just concentrate on areas with less issues. We need those INGOs in [Darfur]. Needs should be central to their presence in Sudan; that is the point of being here."

34 See Glyn Tyler and Raphael Gorgeu, 'IASC System-Wide Scale-Up Mechanism - From Protocol to Reality: Lessons for Scaling up Collective Humanitarian Responses' (IAHE, 2024)

Similar views were heard regarding other war-affected areas:

> "Darfur is not the only affected area, and we're not looking enough at what is happening in and around Khartoum, Al Jazirah, and Kordofan."

Insecurity, along with bureaucratic and administrative impediments imposed by the warring parties, create major challenges in expanding and scaling up. Clearly, a system-wide scale-up does not make these key challenges, many of which are prominent in Sudan, disappear.[35] Insufficient risk tolerance was also noted as an issue inhibiting deployment in areas that are the scene of armed violence. While operating in these areas certainly involves a degree of danger, for humanitarian organizations, this should serve as motivation to assume certain risks. Such factors are inherent in doing humanitarian work.

Interviewees noted a general lack of sense of urgency throughout the humanitarian community in Sudan, however, suggesting that there has been insufficient effort to work around these restrictions. While some acknowledged that progress was made in the second half of 2024, others were pessimistic, with one INGO representative commenting, "We're not in an emergency pace. I have never seen a response that slow." A higher risk appetite could arguably contribute significantly to improving coverage where it is most needed.

The lack of an emergency mindset

Asked for further explanations why expansion and scale-up have been slow, several INGO Country Directors noted difficulty in instilling a sense of urgency in their teams. Prior to the war, many of their staff had worked according to a so-called 'nexus approach,' i.e. delivering aid in a way that serves multiple goals, including humanitarian, developmental, and peace objectives. As one said:

> "We have seen it in other contexts. It takes one year, at best, to switch from development into emergency gears."

This difficulty of shifting gears is indeed not specific to Sudan; it has been documented in other contexts, too.[36] Another problem that has also been seen in other crises is a trend referred to as path-dependent programming.[37] Despite their flexibility and capacity to act, INGOs tend to stay and work in the same areas and sectors over time, rather than moving to locations where aid is needed the most. Consequently, they have difficulty responding to a sudden deterioration in the environment and spikes in needs. Several interviewees pointed out that a number of organisations did not replace their (international) staff with emergency teams following the outbreak of the conflict. In addition, anecdotal evidence suggests that very few new INGOs entered Sudan after the conflict began.[38] This suggests that the majority of actors in the country

"INGOs tend to stay and work in the same areas and sectors over time, rather than moving to locations where aid is needed the most"

35 For lessons on the IASC System-Wide Scale-Up, see Glyn Tyler and Raphael Gorgeu, 'System-Wide Scale-Up Mechanism'

36 Marzia Montemurro and Karin Wendt, 'The Path of Least Resistance. HERE "Mandates" Study Ethiopia Report' (HERE-Geneva, 2019); Ed Schenkenberg et al., 'Inter-Agency Humanitarian Evaluation (IAHE) of the Response to the Crisis in Northern Ethiopia' (IASC, 15 May 2024).

37 Montemurro and Wendt, 'The Path of Least Resistance. HERE "Mandates" Study Ethiopia Report'; R Mena and Dorothea Hilhorst, 'Path Dependency When Prioritising Disaster and Humanitarian Response under High Levels of Conflict: A Qualitative Case Study in South Sudan' (January 2022).

38 Only one of the interviewed INGOs was new to the current Sudan environment.

may still be working on shifting from a nexus approach to an emergency mindset.

Interestingly, all of this shows that the issue of available funding (or lack thereof) has not been the biggest obstacle in scaling up – until now. With the recent decisions from the world's largest donor to suspend and/or stop funding humanitarian responses worldwide, the implications for the response in Sudan will be severe. Financial records show that the US Government was responsible for 43% of the funds in Sudan in 2024.[39] At the time of writing, efforts had started at the inter-agency level to address the funding cuts by re-prioritising the allocation of humanitarian aid, but it remained unclear what criteria or methodology would be applied. The proportionality aspect of the principle of impartiality stipulates that those who are most in need should receive aid first. As noted, while impartiality has been a factor in individual organisations' decision-making at a micro-level, there is broad recognition that this has not been the case from a country-wide and collective perspective. The dramatic cuts in common services like logistics are further evidence of insufficient collective prioritisation, as these services are key in improving efficiency.

b. Independence, neutrality, and the UN

In humanitarian crises such as this one, many INGOs rely on UN agencies for a range of services, such as supply chain management, security advisory services, access negotiations, and, of course, coordination support. This dependency is well-documented, and previous research has found that where NGOs lack capacity to manage their own logistics, security, or access negotiations, it becomes a major limitation in effective emergency responses.[40] It also brings up questions about how INGOs can maintain their independence and neutrality, particularly when they do not agree with the positioning of the UN. As put by one interviewee:

"Where NGOs lack capacity to manage their own logistics, security, or access negotiations, it becomes a major limitation in effective emergency responses"

> "The response is not principled in the sense that the whole action is compromised. We disagree with the UN on a few things … on the risk appetite in terms of access and presence and also in engaging with local actors… Generally, it hasn't been an honest or transparent discussion about the positioning across the humanitarian community.."

The limitations that the UN faces in Sudan have further complicated matters. Indeed, a consequence of the UN's recognition of the authorities representing Sudan is that it has not been able to open access to several parts of the country. It is no longer seen as a neutral actor by the other parties to the conflict. In addition to making it more complex for INGOs who depend on the UN to maintain their own neutrality, the situation presents imminent practical challenges. Several INGO representatives explained how their reliance on the UN has made them vulnerable when the UN has not been able to provide services:

> "I agree that we are dependent too much on [the] UN, especially in coordination and supplies. It affects partners that work in Darfur. [The] UN are not there, no UN staff. Coordination meetings [are] done online mainly, facilitated by UN/cluster staff. NGOs in the field do some kind of informal coordination amongst them."

39 See https://fts.unocha.org/countries/212/summary/2024.

40 See, for example, Monica de Castellarnau and Velina Stoianova, 'Bridging the Emergency Gap - Reflections and A Call for Action After a Two-Year Exploration of Emergency Response in Acute Conflicts', Emergency Gap Project. Médecins Sans Frontières, Barcelona, 2018.

And in the words of another:

> "The UN is generally very absent throughout the country. They have a limited number of staff and a limited ability to deploy. If the UN can't do [coordination and collective functions], then the NGOs have to do it. But we're not staffed to do it. So something needs to change."

In the eyes of many in the INGO community, the UN system should have chartered a more independent course from Sudanese authorities. For several months in the first half of 2024, their advocacy with UN agencies was orientated towards pushing for more independence from the SAF-backed authorities in Port Sudan and an increase in scale-up efforts, but interviewees noted it was a fruitless exercise.

These INGO concerns about the positioning of the UN vis-à-vis all parties to the conflict are valid, but not sufficient. A number of the INGOs realised that they had to become more independent themselves and, as of early 2024, started to rethink the fact they had to rely (too much) on the UN for their logistics and other common services.

It took, however, several months for this awareness of the need to (re)invest in (operational) independence to sink in. In late 2024, it was suggested in the INGO Forum that INGOs take on some collective functions. Examples would include area-based coordination (coordination focusing on the sub-national and regional levels) and last-mile delivery in supply chain management (the last step in ensuring that affected populations receive aid). Within UN circles, the OCHA and the Deputy Humanitarian Coordinator (DHC) have also started to acknowledge the need to discuss complementary options to the UN's dominance in coordination.

"There is a need for a deeper dialogue between the UN and INGOs as to their comparative advantages in negotiating access and coordinating collective scale-ups"

The extent to which INGOs are able to play such a leading role is somewhat uncertain. While the INGO Forum would be a natural place to start, its resources and staffing are limited, and it would require additional financial resources if it were to take on a leadership role. In addition, the UN usually has significant expertise in negotiating access, which can also be valuable to INGOs. It follows that there is a need for a deeper dialogue between the UN and INGOs as to their comparative advantages in negotiating access and coordinating collective scale-ups in places where (additional) humanitarian capacity is needed most. In parallel, INGOs should work to further develop alternative capacities that reduce their dependence on the UN-led system, allowing for faster scaling-up of operations. Where such initiatives already exist, they should be further reinforced.

c. Neutrality and engagement with Sudanese civil society actors

Before the war erupted, HAC regulations implied that INGOs could only carry out projects in partnership with national or local NGOs. This requirement could have fostered better integration of national and local actors in the humanitarian architecture, but it did not bring the desired outcomes. For many years, the landscape of Sudanese NGOs has been regarded with a degree of mistrust, due to the affiliation of several of these NGOs with government authorities. The fact that the authorities told INGOs which local actors

could be sub-contracted did not aid in building trust.[41]

In retrospect, the extent to which INGOs accepted these conditions should have been part of scrutiny at the time. What is more worrying today is the localisation of the aid agenda in the response to the current crisis. This policy, which became a significant system-wide commitment at the 2016 World Humanitarian Summit, is still fraught with issues.

The neutrality of local actors

The suspicions around the political affiliations of national and local aid providers have turned out to be resilient among some parts of the international humanitarian community. Some INGOs have expressed concerns about the neutrality and independence of local actors, given Sudan's highly politicised environment. Not everyone within the traditional humanitarian system considers these actors to be appropriate allies, having their origins in human rights activism or citizen involvement. As one author notes:

> "In a politically turbulent country that has recently experienced a popular revolution followed by a military coup, it is inevitable that some civil society actors engaged in humanitarian action have political roots."[42]

Interestingly, several local actors have actively worked to clarify their ethical standards and position themselves with regard to humanitarian principles, particularly independence and neutrality. Importantly, the Emergency Response Rooms (ERRs) have developed a set of principles to which they adhere, including accountability, participation, transparency, and equality. They also strongly emphasise their independence from political parties and their neutrality in the conflict. It is thought that this reference to neutrality was added as testimony to their desire to engage with the traditional humanitarian system (as designed by the UN General Assembly in 1991). ERR representatives contacted for this review explained:

> "The risk of losing our social setup is critical for us. That's why we care about neutrality, transparency, and clear communication."

These efforts of the ERRs to clarify their ethical framework have not gone unnoticed. In the words of one INGO representative:

> "From my perspective, the ERRs are the most neutral actor in the country when we look at their actual involvement. Anyone using the argument of political affiliation is not doing so in good faith."

Local actors as implementing partners

Adding to the complexity, local actors are still primarily viewed as implementing partners and not treated as equals – let alone primary actors – in the aid efforts. For many INGOs, the ERRs and other local aid actors are still seen primarily as alternatives who can provide humanitarian assistance where access is limited for international actors. The rationale is often pragmatic, as noted by one interviewee:

> "Since we don't have access, we must find alternative options, and the ERRs, or any informal or local groups, provide such an option."

41 Margie Buchanan-Smith, 'The Meeting of Humanitarian and Civic Space in Sudan: Lessons for Localisation', ed. ODI - Humanitarian Practice Network, 19 August 2024; Conflict Sensitivity Facility, ed., 'Making Sense of "Localisation" in Sudan', 11 May 2023.

42 Buchanan-Smith, 'Meeting of Humanitarian and Civic Space', 27.

It is also interesting to note that not everyone within the INGO community is fully aware of the ERRs' work and structure. It was explained that while they did not dismiss the ERRs' efforts, collaborating with such informal groups would fall outside their organisations' ways of working and expertise.

The fact that the traditional humanitarian system has not yet fully embraced the ERRs is illustrated by the fact that they do not appear in security incident datasets or analyses of the results of humanitarian work. Advocacy efforts from various international actors calling for the respect and integrity of the humanitarian mission and aimed at protecting humanitarian workers have not sufficiently included references to the ERRs. Support for the ERRs through advocacy from international actors would be welcome, as these networks are not (yet) accepted in all Sudanese states. In addition, the ERRs' rapid expansion, coupled with growing public scrutiny, has led to internal issues and challenges regarding their future in terms of governance and way of working.

Generally, consultations among INGOs on how to engage and partner with local aid providers is perceived as suboptimal. Likewise, there is room for improvement in coordination. International and national/local NGOs would benefit from consulting each other on similar challenges they face in navigating operational constraints. For example, like their INGO counterparts, some national NGOs also had to split their coordination structures or entire organisations to operate across both SAF- and non-SAF-controlled areas. Furthermore, the HCT does not have any national NGO representation. In October 2024, the HCT discussed a localisation review conducted earlier in the year, noting that significant challenges persist, such as power imbalances, a trust deficit, and inequality in accessing funding opportunities.[43] Acting on the commitment towards localisation, the HCT agreed that efforts should be made to strengthen and support the role of Sudanese NGOs in the response.

"International and national/local NGOs would benefit from consulting each other on similar challenges they face"

Risk tolerance and risk-sharing

Thirdly, and most practically, many of the business management systems used by the international aid community do not allow for the level of risk tolerance needed in the Sudanese context. Interviews revealed a degree of competition among INGOs to work with those Sudanese NGOs they consider capable of carrying out projects according to international standards for reporting and accountability. This is a common feature in many humanitarian settings. The desire for so-called accountability has had counter-productive side effects when it comes to working with local aid providers. Instead of prioritising flexibility and building on the distinct features that serve as comparative advantages, informal or non-institutionalised Sudanese networks and groups such as the ERRs are expected to follow and comply with financial reporting and accountability standards that undo these distinct features of informality and social engagement.

Initially primarily supported by local communities and the Sudanese diaspora, ERRs have also begun receiving increased grants from the humanitarian system. In fact, the research for this report saw several efforts to adjust existing financial frameworks to better accommodate local actors, including the informal mutual aid networks. The Sudan Humanitarian Fund, for example, allocates funds indirectly to ERRs through registered national NGOs, with up to USD

43 HCT meeting minutes, 1 October 2024.

representatives also explained that they have significantly increased their engagement with these grassroots networks and community-led initiatives in this response, adding that the primary challenge for them remains transferring funds while ensuring donor accountability and adhering to risk management frameworks.

To address this challenge, some international actors have developed ways to work around existing frameworks. For example, they categorised the ERRs as 'beneficiaries' of their programs at the community level eligible for donations, thereby reducing bureaucratic burdens and unnecessary reporting. One drawback is that this solution comes with limitations in terms of the amount of financial support involved. It follows that more needs to be done to strengthen engagement with Sudanese aid providers in developing equitable partnerships and leveraging the comparative advantages of local organisations.

Importantly, some interviewees stressed the necessity for further collective risk-sharing and risk management referring also to initial discussions in some workshops held in 2024.

One INGO representative highlighted:

> "We tell donors that we have a no-regret approach. We know there are risks in certain areas in delivering some programs. If we are to save lives, if we are to reach people, there are certain levels of risk that we have to accept. And those risks could be financial risks, they could be risks to the principles themselves, they could be risks to a number of things. We need an understanding that in a context like Sudan, we need to define our risk threshold for different things and agree that's the framework that we are going to follow."

Similarly, another interviewee commented:

> "Of course, this committments requires willingness to share the potential financial cosrs that come with risk"

Embracing a higher acceptance of risks is not only a matter for individual organisations but also requires a collective effort at the system level. This is recognised by the HCT, which noted in October 2024 "the importance of moving collectively forward with an adjusted risk posture". There is a need for collective risk acceptance and risk-sharing among INGOs, NNGOs, UN agencies, and donors, ensuring that the potential consequences of taking risks are not borne solely by the on-the-ground operational actors but are carried across the humanitarian community.

"Embracing a higher acceptance of risks is not only a matter for individual organisations but also requires a collective effort at the system level"

KEY TAKE AWAYS

- The UN's approach to leading and coordinating the collective humanitarian response in this crisis has been characterised by some serious limitations, which affected INGOs and other humanitarian actors. In recognising the SAF as the government of Sudan, the UN took a political stance in opposition to certain humanitarian principles. As a result, UN humanitarian agencies are seen as partisan, and have not been able to secure a position that allows them to gain full humanitarian access to non-SAF-held areas. **Instead of relying on the UN, several INGOs have realised that they need to invest in their own capacity to negotiate access.**

- Justifiably or not, national and local NGOs have been viewed with suspicion for many years because of their affiliations with the Sudanese government. For years, if not decades, the government has imposed certain conditions on humanitarian work, many of which amount to manipulation or instrumentalisation. As it was difficult for international organisations to withstand this manipulation, it was at least as difficult for national and local NGOs to escape these pressures. It is extremely difficult to push back on these conditions now, but the armed conflict has created an **opportunity to remind the government to abide by its obligations under international humanitarian law (IHL).**

- A specifically valuable role in the humanitarian response to the Sudan crisis has been played by the **Emergency Response Rooms (ERRs)** – community support groups emerging from the civil society movement and the resistance committees that have pushed for democracy in the country since 2019. Working effectively with these ERRs requires that the international community take a different approach from the standard contractual implementing partner arrangement. **These groups have much to offer in a collective dialogue of principled action in Sudan in terms of explaining their understanding and approach towards humanitarianism.**

IV. TOWARDS A COLLECTIVE APPROACH TO PRESERVE HUMANITARIAN SPACE

Delivering a principled humanitarian response requires a collective effort for two reasons: first, the compromises one agency makes with warring parties affect other organisations; and secondly, negotiating humanitarian access with authorities who have become masters in instrumentalising and manipulating aid requires the power of the collective. As highlighted by one interviewee:

> "It's really important to note how clever the authorities are here and how diligent they are at extracting resources and picking us off really one by one. They use a manipulation technique, making you feel like you're on the defensive."

Hence, many interviewees emphasised the need for a more unified approach when it comes to pursuing a principled approach.

a. Ensuring collective lines of engagement

The idea that a collective approach generates more influence is not a new one, but it requires that everyone follows, and complies with agreed principles, especially red lines. A failure by one (or some) to fully commit to following a collective approach will weaken the broader community and ultimately undermine the ability to meet the needs of affected populations.

The Joint Operating Principles

The Sudan response has seen several attempts to establish collective lines of engagement, including the Joint Operating Principles (JOPs).[44] While these initiatives have been welcomed, interviewees also pointed to significant challenges. Essentially, there is insufficient transparency among humanitarian actors on the individual deals some organisations close with authorities. The consequence is a loss of trust among organisations, resulting in fragmentation that, in turn, weakens the community's negotiating power. Such challenges, including a deficit of trust among actors and a lack of willingness to invest in the collective dialogue on what it means to deliver principled humanitarian action, are also seen in other crises.[45]

"Delivering a principled humanitarian response requires a collective effort"

The JOPs represent a well-intended initiative to define common lines or ground rules for all humanitarian actors. Established in July 2023, the JOPs ask warring parties to observe the integrity of the humanitarian mission and to show respect for it.[46] In return, humanitarian organisations commit to following a strictly principled approach. Establishing such ground rules has become common practice in a number of humanitarian settings. In a sense, Sudan is the birthplace of such joint principles with Operation Lifeline Sudan, established in the late 1980s (and, practically, run until the mid-1990s).[47] The OLS policies, which included ground rules defining minimum acceptable standards of conduct for the humanitarian agencies that had joined OLS and the official counterpart for areas controlled by the Sudan People's Liberation Movement-United (SPLM-United), might be instructive for today's crisis

44 Among other efforts are the position paper developed by the Sudan Humanitarian Access Working group on engagement with SARHO, and efforts by the INGO Forum to coordinate interactions with both the SAF and the RSF.

45 For example, in the context of the Yemen response in 2021, this issue was noted as the "prisoner's dilemma," as rational entities – humanitarian organisations – decided not to cooperate, although it was clear that was in their best interest to do so. See Montemurro and Wendt, 'Principled Humanitarian Programming'.

46 OCHA, 'Sudan – Humanitarian Country Team Joint Operating Principles', 18 July 2023.

47 "OLS was based on a process of 'negotiated access,' in which aid organisations and parties to the conflict come to an agreement regarding the behaviour of combatants towards aid workers – including aid worker security – and respect for international humanitarian law." See Daniel Maxwell, Martina Santschi, and Rachel Gordon, 'Looking Back to Look Ahead? Reviewing Key Lessons from Operation Lifeline Sudan and Past Humanitarian Operations in South Sudan', October 2014.

in Sudan.[48] OLS activities included cross-border operations[49] – which have been used as a bargaining chip in the current crisis. By cutting off the humanitarian supply route into the Western Darfur region (which runs through Adré, Chad) for prolonged periods in 2024, for example, the SAF demonstrated its authority and control over humanitarian aid going into non-SAF-controlled territory.

The main issue with the JOPs has been the lack of follow-up and implementation. As the 2023 SCORE report on Sudan highlights:

> "[The JOPs] are well elaborated but remain aspirational, often ignored in practice, and were slow to be rolled out and communicated with parties to the conflict at state and local levels. Part of the problem seems to be that OCHA has been unable as yet to establish an on-the-ground, regular presence in key states in order to be able to lead state-level negotiations. In the meantime, some practitioners noted a tendency to 'shut up and put up, and see what you can negotiate quietly on your own.'"[50]

Making principles central to a collective strategy is one step in the right direction; the next step is to make sure that the principles filter down to the ground level and that everyone is aware of them and uses them. In such an effort, the HCT has a key role to play in ensuring regular inter-agency dialogue on adherence to the JOPs. From what the research for this review saw, the JOPs have not appeared often on the HCT's agenda since their endorsement in July 2023, and, moreover, it does not appear that these discussions involved agencies reporting on their implementation measures. On the contrary, evidence suggests the JOPs were dealt with in a 'light' manner, at times questioning their relevance and noting the need to review them as part of a discussion on risk-taking and the diversity of approaches.[51] The HCT discussions also reveal that several members see the JOPs as more relevant in the context of engaging with SARHO than the HAC, an issue highlighted earlier in this report.

"The main issue with the JOPs has been the lack of follow-up and implementation"

A common stance vis-à-vis SARHO

Since mid-2024, the issue of how to engage with SARHO has become contentious, with the increased pressure for registration and the emergence of a formalised framework for humanitarian operations. Until that time, engagement with the RSF was primarily an ad hoc matter, mostly limited to securing travel permits and obtaining security clearances to RSF-held territory. In attempting to develop a common stance vis-à-vis SARHO, the INGO Forum has taken an important leadership role and has tried to achieve a shared position among INGOs on the issue of registration. While some organisations have already begun this process, others remain hesitant, with some opting to keep their decisions confidential and avoid disclosure to their peers. A number of donors are discouraging INGOs from registering with SARHO, presumably for the main reason that it would confer a legitimacy on SARHO that they do not want to endorse.

48 See SPLM-United, 'Operation Lifeline Sudan Agreement on Ground Rules', 29 May 1996, and Bottjen, A., 'The Joint Operating Principles (JOPs) - How Can They Help Prevent the Weaponisation of Aid?', The Conflict Sensitivity Facility, 19 December 2024.

49 Lokichogio in northwest Kenya was the main operations hub for OLS to deliver relief to what is now South Sudan.

50 Humanitarian Outcomes, 'Humanitarian Access SCORE Report: Sudan - Survey on the Coverage, Operational Reach, and Effectiveness of Humanitarian Aid'.

51 In a meeting in October 2024, this rhetorical question was raised in the HCT: "Are the JOPs suited for our current situation or for the ideal?"

b. A network approach to principled action

When trying to determine the best approach towards preserving humanitarian space, organisations will also ask themselves whether an individual approach might be more effective than a collective arrangement. While going it alone might undermine the collective effort, organisations that wish to preserve their independence are, understandably, cautious in aligning themselves with initiatives or collective positions that they see as detrimental to this principle. A number of INGOs see it as important to distinguish themselves from the UN – not only because they see the UN as non-neutral, but also because the UN is the authorities' primary target for control and manipulation of aid, given the size of their operations. By differentiating themselves from the UN, these INGOs aim to avoid being caught in the same political dynamics as the UN and its bureaucratic procedures. This might be relevant, for example, in cross-border operations: they may pivot towards looking for alternative options to negotiate access.[52]

While a diversity of approaches does not simplify matters, it can provide a good starting point for a coordinated approach. In this case, the purpose of a coordinated principled approach is not to adopt a single common position but to seek complementarity. It requires full transparency and openness from participants in terms of their intentions and approaches. Essentially, coordination in this way follows a network approach to principled action, in which diversity might become an asset. For one thing, it could complicate authorities' efforts to control humanitarian assistance, as a wider range of tactics would be harder to monitor and limit. Currently, there are some signs of such a network approach already in place, but this is more by chance than by design.

"the purpose of a coordinated principled approach is not to adopt a single common position but to seek complementarity."

It would be beneficial to examine how such a network approach[53] to principled humanitarian action could be enhanced by making it a more explicit strategy and exploring further alternatives. To give some practical examples, INGOs might be able to invest more with Sudanese informal aid groups as a means of bypassing restrictive administrative frameworks, leverage diaspora initiatives, engage with private sector entities to support local economies, or improve connectivity for communities in hard-to-reach areas to facilitate cash transfers, etc. The goal is to encourage complementarity in humanitarian action, allowing for creative solutions that are not constrained by the need for collective alignment. Ultimately, this approach seeks to leverage the comparative advantages of different actors and different forms of humanitarian action within the humanitarian community. As explained by one INGO Country Director:

> "There is no such thing as 'there's no access.' There's no access for a specific organisation or there's no access for a specific entity or whatever it may be, but others do have access and are able to respond. You know that you are not able to go there, but there are local groups that are working there and there are local NGOs that are working there, and they may have very different standards to what the international community accepts as a norm. We need to recognise that this is the way forward and this is where we need to go. So, think of access in a different way."

52 See Emma Beals, Convoys, Cross-Border, Covert Ops: Responding to State-Led Arbitrary Aid Denial in Civil Wars, Lessons from Syria, Myanmar and Ethiopia (Beirut, 2023), https://lb.boell.org/en/2023/07/06/convoys-cross-border-covert-ops.

53 See, e.g. Ben Ramalingam, Enrique Mendizabal, and Ed Schenkenberg van Mirop, 'Strengthening Humanitarian Networks: Applying the Network Functions Approach' (ODI, April 2008).

KEY TAKE AWAYS

- **Collective dialogues on humanitarian principles, which, critically, should underpin a humanitarian strategy, have largely failed so far.** The Joint Operating Principles (JOPs) established by the Humanitarian Country Team (HCT) have been of little added value, as there has been little to no follow-up, let alone action taken when agencies deviated from these principles.

- **The key to a more effective collective principled approach is not making everyone do the same thing. On the contrary, it is about recognising the added value and specific strengths of each actor** (i.e. the UN, the Red Cross/Red Crescent, INGOs, national/local NGOs, and civil society community groups) and understanding how to achieve complementarity among their different approaches.

- **The INGO Forum has a leadership role to play in providing a platform for collective dialogue on principles and strategy among INGOs.** In many ways, it is forced to compensate for the limitations that the UN and the HCT are facing. In pursuit of a networked humanitarian community instead of one led by an HC/HCT, the INGO Forum could become the main platform for dialogue on humanitarian principles, strategy, and complementarity among the various humanitarian actors.

V. CONCLUSION: LEVERAGING COMPARATIVE ADVANTAGES

The humanitarian community is facing significant constraints in Sudan. Its capacity to deliver assistance at scale and across the country remains limited. As outlined in this report, certain actions could help in addressing some of these shortcomings: reinforcing a sense of urgency and pushing for further expansion; reducing dependency on UN collective services; and enhancing INGO coordination in ensuring collective efforts, accepting greater risk exposure, and increasing support for informal local aid groups. Nevertheless, it is likely that the overarching challenge of the restrictive operational environment, shaped by decades of control over humanitarian assistance, will remain. What, then, can realistically be done?

In highly complex environments, the insistence on a singular, standardised, and common approach risks stifling creativity and adaptability. Instead, the humanitarian community should embrace diversity as a strength rather than a limitation. By leveraging the comparative advantages of different actors, the system can create space for parallel, alternative, complementary, and innovative approaches. This means encouraging varied modus operandi, approaches, and positioning, acknowledging that some will succeed where others fail, and remaining flexible as the relevance of certain approaches shifts over time. It also implies accepting the possibility of failure as part of the learning process. This requires a shift in mindset: collective coherence should not preclude the exploration of diverse strategies. Unfortunately, such discussions are currently rare within the humanitarian community in Sudan, as evidenced by the content of HCT discussions and the interviews conducted for this review.

The central issue in Sudan is navigating the restrictive administrative framework imposed by the authorities – a challenge the current system is ill-equipped to address. Alternative approaches must be further explored, fully considered, and increasingly supported. In this exploration, mutual aid groups and actors across Sudanese civil society, some of whom are less constrained by the administrative frameworks imposed by authorities, play a vital role. Their contributions should be recognised and enhanced as part of a broader, more inclusive humanitarian strategy. However, engagement with those groups should be on their terms, acknowledging their philosophy of action in order to preserve their identity, added value, and flexibility.

Trying out alternative approaches that the humanitarian system is less used to comes with its own dilemmas and risks, but these should not deter exploration. Ultimately, the responsibility lies with individual actors to assess whether alternative approaches align with their mandates and values, and with the collective to openly discuss and agree upon a common strategy. Importantly, the humanitarian principles should not be viewed as an ethical stumbling block but as part of a framework to help agencies weigh their decisions.

The principles of humanity and impartiality are the cornerstones of the humanitarian endeavour, and in order to achieve their fulfilment at scale, the comparative advantages between individual organisations should be leveraged. Neutrality and independence are practical tools, and they should be used in a way that makes sense in a particular context to ensure humanity and impartiality. Too polarised a discussion around the interpretation of the principles is detrimental to a successful collective approach to principled programming. What is important is to ensure clear and transparent reflections and discussions around the type of compromises that may be necessary and why, and what safeguards may consequently be needed to ensure an approach that supports a collective strategy, both in the immediate context and in the future.

a. Recommendations

The following recommendations are orientated towards those humanitarian actors that pay a particular role in facilitating and promoting inter-agency coordination and collective action. These actors do not only include, OCHA, the Humanitarian Coordinator and HCT members, or the INGO Forum, but also other humanitarian actors and donors who recognise the interdependence that exists in the humanitarian community.

1. Create a space for a frank and open dialogue on what it means to deliver principled humanitarian action in Sudan. This dialogue should be constructive, instead of polarising, proactive, instead of reactive, and produce a collective framework for principled decision-making that is orientated towards complementarity by building on the advantages of different approaches to delivering principled responses. A dialogue that focuses on red lines only is not helpful in this regard. The ICVA guidance for principled humanitarian action can help individual organisations clarify internally how to practically apply the humanitarian principles in their daily work, but this should be done in parallel to collective discussions on the subject, and informed by how the actions of one organisation can impact those of others.

2. Embrace diversity as a strength. A collective framework for principled decision-making should inform an inclusive humanitarian strategy that does not preclude the exploration of diverse approaches. Mutual aid groups and other civil society actors should be recognised and enhanced as part this strategy in a way that does not force them to abandon their identity, added value, and flexibility.

3. Invest in comparative advantages. It should be recognised that because of their character or certain political, operational or security decisions, UN agencies may not be able to work in all areas. For areas where the UN cannot operate, and when the pooling of resources or combining capacities becomes an issue, INGOs should be prepared to invest in their capacities to negotiate access or manage logistics to ensure that they are operationally independent. Donors should be prepared to fund such investments.

4. Emphasise collective thinking around proportionality. Adhering to the principle of impartiality means that those who are most in need will receive assistance first. Agencies should therefore also look at impartiality from a national, country-wide perspective, instead of only at the project level. OCHA's Humanitarian Operational Presence and Operational Capacity dashboards should allow for agencies to make decisions in this regard that are adequately informed by the collective response.

5. Avoid double-standards. In negotiating access, humanitarian agencies should be even-handed in their decisions to accept certain conditions from warring parties regardless of who that party is. It is important in such negotiations to remind all parties of their obligations under international humanitarian law.

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ANNEX 1: MAIN LINES OF INQUIRY GUIDING THE REVIEW

i) INGOs and the humanitarian principles

How do INGOs approach the humanitarian principles in Sudan?

What role do humanitarian principles play in shaping INGOs' operational positioning in Sudan?

What other factors influence their operational positioning?

How do humanitarian principles facilitate or hinder collective reflection and action?

What latent functions does the mobilisation of (and reference to) humanitarian principles serve within the INGO and humanitarian community?

ii) INGO operational approaches, and the challenges and opportunities for scaling up and expanding their humanitarian response

What operational approaches do INGOs deploy in Sudan?

What drives their operational strategies?

What are the limitations and opportunities for scaling up and expanding?

What adjustments and pathways forward can be considered?

iii) INGOs, UN positioning, and the interdependence of the humanitarian system

What are INGOs' operational engagements with the UN in Sudan?

To what extent are INGOs dependent on or independent from the UN in Sudan?

What are the opportunities and challenges related to interdependence within the humanitarian system in Sudan?

What roles should INGOs play in fulfilling collective functions within the humanitarian system?

iv) INGOs and their engagement with Sudanese aid actors

How do INGOs engage with Sudanese aid actors?

How do INGOs approach the role of Sudanese aid actors and locally-led actions in Sudan?

For what purposes do INGOs engage with Sudanese aid actors?

What considerations should be taken into account to enhance such collaboration?

v) INGOs and the preservation of an operational humanitarian space

How do INGOs work to preserve their operational humanitarian space in Sudan?

How do they engage with authorities and parties to the conflict?

How coordinated, aligned, or fragmented are INGOs in their efforts to preserve an operational humanitarian space in Sudan?

What options exist for further engaging in the preservation of an operational humanitarian space in Sudan? What are the associated risks and opportunities?

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