

Unintended consequences of localization agenda: insights from Rohingya humanitarian response in Bangladesh

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Abstract

Purpose – This article aims to investigate the key factors contributing to the unintended consequences of humanitarian localization in the Rohingya humanitarian response in Bangladesh. It addresses the central research question: What factors contribute to the unintended consequences of localization and undermine its genuine implementation in the Rohingya humanitarian response?

Design/methodology/approach – Grounded in the theoretical aspirations of developmentality and informed by typologies of unintended outcomes, this study unpacks the power dynamics embedded within localization practices. Using reflexive thematic analysis of 20 semi-structured interviews with representatives of local and international humanitarian organizations, it identifies four inductively derived core themes, reflecting the factors shaping both the processes and outcomes of the localization on the ground.

Findings – The study highlights four interrelated factors driving unintended consequences of localization, undermining its actual implementation in achieving intended outcomes: (1) marginalization of local actors in decision-making processes, (2) operational inefficiencies due to top-down program structures, (3) persistent financial dependency and lack of sustainability and (4) donor-driven patron–client relationships.

Originality/value – While localization is a central tenet of contemporary humanitarian discourse, its practical implementation – particularly its unintended consequences – remains underexplored in the context of the protracted Rohingya crisis in Bangladesh. This study contributes original insights by identifying the key factors driving both foreseeable and unforeseeable unintended outcomes. By critically interrogating the externally led localization practices, it elucidates how these unanticipated consequences undermine the effectiveness of genuinely locally led models in achieving intended outcomes in humanitarian action.

Keywords Localization, Unintended consequences, Rohingya response, Developmentality, Bangladesh

Paper type Research article

1. Introduction

The 2016 World Humanitarian Summit (WHS) calls for a significant effort in humanitarian reform through the launch of the Grand Bargain (Khan and Kontinen, 2022), which established localization as a strategic priority aimed at enhancing the effectiveness, efficiency and sustainability of humanitarian action. Since its inception, localization has become a central pillar in global humanitarian discourse, advocating for a shift in power dynamics that places local actors at the forefront of disaster preparedness, response and recovery. However, despite its normative appeal of making humanitarian action “as local as possible, as international as



necessary,” the localization agenda remains a complex and contested process in practice, marked by persistent implementation challenges and uneven shifts in authority and resources (Frennesson *et al.*, 2022). International agencies frequently retain control over strategic decision-making, relegating local actors to implementation roles. This imbalance reinforces hierarchical structures and dependency, rather than fostering genuine empowerment and leadership among local actors (Khouri and Scott, 2024).

Local non-governmental organizations (LNGOs) [1] are often constrained by complex donor requirements (Khan, 2023) and burdened with administrative demands that outweigh their financial and institutional capacities (Koch and Rooden, 2024). These limitations have prompted growing calls for “decolonization” and “locally led” development, advocating for a meaningful shift in power to local actors as a way to counteract neo-colonial and West-centric approaches to aid (Barbelet *et al.*, 2021). In practice, the operationalization of localization has revealed significant tensions between intent and implementation (Trepte, 2024; Van Selm *et al.*, 2025). Efforts to improve the efficiency and effectiveness of humanitarian responses – such as local procurement, the formation of local partnerships and the recruitment and training of local staff – are promoted as steps toward more inclusive and context-sensitive aid (Ingram, 2024; Schmitz and Mitchell, 2025). Yet, these decentralization measures often allow international organizations to retain disproportionate control over resources and authority, a dynamic partly rooted in the profit-oriented nature of humanitarianism (Frennesson *et al.*, 2022).

In the context of the Rohingya humanitarian response, hundreds and thousands of Rohingyas, forcibly displaced by state-led persecution from the Myanmar military, have been living primarily on humanitarian aid in camps across Bangladesh since 2017 (Khan, 2023). Cox’s Bazar district has since become a central humanitarian hub, with multiple actors – including United Nations (UN) agencies, international nongovernmental organizations (INGOs) and Bangladeshi LNGOs – engaged in delivering services and relief. To enhance both the effectiveness and emancipatory potential of the response, the localization agenda became central to the humanitarian response in Cox’s Bazar. The status of being “local” emerged as a legitimate criterion in the Rohingya response (Roepstorff, 2020), irrespective of the effectiveness of funding or the persistence of a de facto “business-as-usual” model (Khan, 2024). Predominantly, local actors’ involvement is assumed to be central to humanitarian aid due to lower structural costs and their geographical proximity to affected communities (Manis, 2018). However, in practice, the implementation of localization has often proven more costly, generating operational inefficiencies despite its intended cost-effectiveness (Barakat and Milton, 2020; Koch and Rooden, 2024), and, notably, it is frequently implemented without a meaningful transfer of power to local actors, thereby perpetuating existing power imbalances (Khouri and Scott, 2024; Roepstorff, 2020) and reproducing unintended consequences in humanitarian localization.

Generally, “unintended consequences” are defined as outcomes of actions that diverge from the actor’s original intentions (Merton, 1936, cited in Jabeen, 2018). Baert (1991) further explains that unintended consequences arise from purposive actions whose effects deviate from initial intentions, often due to complex mechanisms inherent in the intervention. For example, in the context of localization, efforts to empower local actors may simultaneously reinforce donor dominance due to structural, institutional or operational factors, even though such outcomes were not intended. Accordingly, this article investigates the factors contributing to the unintended consequences of localization within the Rohingya humanitarian response in Bangladesh.

To address the research problem, this article investigates the research question: What factors contribute to the unintended consequences of localization and undermine its genuine implementation in the Rohingya humanitarian response? By identifying the potential factors linked to negative unanticipated outcomes, the analysis seeks to refine the localization process, enhancing its adaptability while strengthening the theory of change [2] logic underpinning localization (Bamberger *et al.*, 2016). The underlying assumption of ToCs is that transferring

resources and decision-making authority to local actors will generate more sustainable, efficient and contextually appropriate outcomes, thereby translating the rhetoric of localization into practice. Addressing these driving factors of unintended consequences also requires confronting persistent barriers to implementing localization, including donor mistrust, rigid compliance frameworks, unequal partnerships and reluctance to relinquish power to local actors.

2. Unintended consequences of humanitarian localization: a literature review

2.1 Localization of humanitarian action

Colloquially, the humanitarian localization agenda aims to enhance the effectiveness of humanitarian action by transferring responsibilities, power and direct funding to local and national actors (Baguios *et al.*, 2021; Khan and Kontinen, 2022; Khan, 2024; Frennesson *et al.*, 2022). The concept of localization is not new. Debates around localization can be traced back to the 1960s, initially emerging from calls for participatory development (Vij, 2023). The 1980s' exhortation to "put the last first" (Harris and Tuladhar, 2019) further criticized top-down, hierarchical approaches that paid little attention to local knowledge, needs and realities (Chambers, 2014). Later, the 2005 Paris Declaration on Aid Effectiveness significantly shaped discourse by emphasizing principles of partnership grounded in local ownership (OECD, 2005; OECD, 2008). A growing body of scholarship argues that, at its core, localization aims to rebalance entrenched power asymmetries between local and INGOs, thereby challenging neo-colonial practices and Western-centric biases (Barakat and Milton, 2020; Khoury and Scott, 2024; Roepstorff, 2020). As a result, localization is often used interchangeably with related concepts such as "locally led development," "shifting the power" and "decolonization" (Banks *et al.*, 2024).

According to Schmitz and Mitchell (2025), the rationale for localization can be examined through two primary argumentative frameworks: *deontological* and *consequentialist* (Robillard *et al.*, 2021, p. 19). The deontological perspective focuses on the process of localization as a normative imperative, rooted in principles such as human rights and self-determination, and in dismantling colonial mindsets embedded in Global South–Global North relations (Munro and Rahman, 2024). In contrast, the consequentialist perspective emphasizes the outcomes of localization, highlighting objectives such as improved efficiency, enhanced aid effectiveness (Roepstorff, 2020) and the pursuit of *developmentality* (Lie, 2024). Koch and Rooden (2024) identify two primary schools of thought regarding the intended effects of the localization agenda: *organization-oriented* and *community-oriented*. The organization-oriented perspective, often adopted by donors and INGOs, views localization primarily as a means of cost reduction – both directly and indirectly – through the devolution of responsibilities, capacity-building of local actors and strategic partnerships with international organizations. In contrast, the community-oriented perspective focuses on improving local conditions by enhancing the effectiveness of development projects and humanitarian responses while simultaneously strengthening local capacities to ensure the long-term sustainability of interventions. However, these aspirations often collide with entrenched power structures and operational practices. INGOs and UN agencies continue to dominate the humanitarian sector, controlling funding and influencing program design (Harris and Tuladhar, 2019). As a result, externally driven approaches to localization often diverge from their original rhetoric, thereby undermining their transformative potential – as evidenced in the localization of the Rohingya response (InSights, 2023).

Predominantly, a genuinely locally led model emphasizes local actors' leadership in decision-making, co-designing interventions and ensuring accountability to both donors and affected communities (Gingerich and Cohen, 2015), with the ultimate goal of decolonizing humanitarian aid. Hence, localization can be understood as a transformative framework (Robillard *et al.*, 2021; cited in Koch and Rooden, 2024) aimed at fundamentally dismantling power asymmetries within the Western-dominated humanitarian system. While its core

principles emphasize local empowerment and leadership, these ideals frequently conflict with entrenched aid structures and practices (Lie, 2024). Mitchell (2021), therefore, describes this situation as a state of “functional inertia” – a condition in which localization is widely recognized as necessary yet consistently fails to translate into meaningful practice. Frennesson *et al.* (2022), for instance, examined the localization of logistics functions such as procurement, warehousing and transportation, revealing that many international humanitarian organizations continue to centralize decision-making and technical capacities at their headquarters, thereby limiting the transfer of these functions to local counterparts. However, a systematic assessment of these inadvertent dimensions of the localization agenda remains largely absent, with existing analyses often emphasizing how localization *should* be implemented to achieve intended outcomes rather than critically examining how it is *actually* operationalized in practice (Koch and Rooden, 2024).

2.2 Conceptualizing the unintended consequences of localization

Understanding the unintended consequences of localization is essential for evaluating the effectiveness and sustainability of humanitarian and development interventions within the broader localization discourse. In the context of project implementation or intervention, unintended outcomes are an inherent by-product of complex systems, which cannot be entirely avoided or denied. Hence, evaluations must be considered opportunities to step back and critically assess whether interventions are functioning as intended on the ground or producing unanticipated results (Jabeen, 2018). These consequences emerge when the outcomes of an action do not align with the initial goals or intentions that motivated the action (Baert, 1991). The concept of “unintended consequences” traces back to Merton’s (1936) essay, “*The Unanticipated Consequences of Purposive Social Action*,” which posited that “unintended consequences” are inherent to the direct result of social action (cited in Cochrane and Wilson, 2023). These outcomes, whether positive or negative, may emerge as anticipated or unanticipated in any implementation project (Jabeen, 2018; Koch and Rooden, 2024).

The underlying assumption is that if unintended consequences are not identified and managed effectively, they can disproportionately affect vulnerable populations (Bamberger *et al.*, 2016). However, understanding these consequences is inherently challenging, as it is often difficult to establish clear causal links between actions and their effects. In particular, forces driving actions that generate unintended outcomes are frequently obscured, and interpreting these outcomes in relation to the original intentions is further complicated by the retrospective reconstruction of events, which can blur the boundaries between intended and unintended effects (Baert, 1991; Merton, 1936). Substantial scholarship on the complexities of unintended consequences in international development (Baert, 1991; Chambers, 2014; Jabeen, 2018; Manis, 2018) underscores the importance of addressing these dynamics to prevent the erosion of program effectiveness and the continued support of underperforming initiatives, such as the localization of humanitarian action (Roepstorff, 2020; Khan and Kontinen, 2022; Barakat and Milton, 2020). In this context, critics argue that insufficient inclusion of Global South actors remains embedded within the localization agenda, including the commitments made in the 2016 WHS, thereby risking the production of unforeseen and potentially counterproductive outcomes (Koch and Rooden, 2024). Thus, it is crucial to examine how such unintended effects intersect with both the processes and outcomes of localization in the Rohingya response.

3. Theoretical aspirations

Localization is increasingly framed as part of efforts to decolonize aid, aiming to transform aid relationships into genuine partnerships (Barter and Sumlut, 2023; cited in Lie, 2024). However, despite these aspirations, localization policies often embed subtle forms of power and control. Drawing on Foucauldian notions of governmentality, Lie (2024) introduces the

concept of “developmentality” to illustrate how localization institutionalizes donor-driven practices through the audit culture and accountability compliance within humanitarian governance. The developmentality lens highlights the tension between the ideals of localization and its practical implementation, showing how local actors are compelled to align their actions with donor expectations, effectively reproducing new donor-recipient dynamics. In this sense, developmentality represents an implicit form of power, whereby donors retain influence over governance and shape partnerships through accountability and audit cultures (Shore and Wright, 2015), risking the perpetuation rather than the transformation of existing aid structures and exploiting the purpose of localization.

In this regard, Merton’s (1936) theory of unintended consequences poses a critical framework for analyzing how humanitarian interventions can diverge from their intended objectives. Program evaluation literature extends this perspective by distinguishing between *intended outcomes* – the planned results of interventions – and *unintended outcomes* – effects that were not originally anticipated (Jabeen, 2018). In the context of international development, and particularly humanitarian crises where emergencies are unpredictable, not all outcomes of localization can be anticipated, which inevitably limits the applicability of typologies. Unintended outcomes can be systematically classified for program evaluation across four dimensions: *knowability*, *value*, *distribution* and *temporality* (Baert, 1991; Jabeen, 2018). Together, these dimensions allow for a systematic assessment of unintended consequences across multiple levels of analysis.

Knowability differentiates between outcomes anticipated in advance and those unanticipated, with the latter subdivided into foreseeable (predictable but overlooked) and unforeseeable (impossible to predict) effects (Merton, 1936; Morell, 2011). Moreover, Jabeen (2018) draws on Merton’s (1936) framework to identify five sources of foreseeable unintended outcomes: ignorance (limits of knowledge), error (misjudgments), imperious immediacy of interests (short-term priorities over long-term consequences), basic values and self-defeating predictions. Furthermore, unintended outcomes can be characterized by their *value* (positive, negative or neutral), *distribution* (affecting participants, non-participants or the broader system) and *temporality* (occurring immediately or emerging over time, potentially shifting from positive to negative or vice versa). Nonetheless, some unintended outcomes are unavoidable. For example, donor dominance – reinforced through audit cultures and accountability mechanisms (Lie, 2024) – cannot be easily eliminated even under a localization agenda, which is in some instances necessary. These structural constraints help explain why the intended transfer of power to local actors is frequently subverted, with upward accountability to donors often outweighing downward accountability to affected communities.

Taken together, the concepts of *developmentality* and *unintended consequences* provide a robust theoretical framework related to localizing the Rohingya response. While developmentality exposes how localization embeds power and governance logics, Merton’s framework – adapted through Jabeen’s (2018) typologies – illustrates how well-intentioned interventions can produce unforeseen outcomes. This integrated lens allows for a systematic examination of both the types of unintended consequences and the structural factors driving them in humanitarian practice.

4. Methodology

The research design and methodological approach of this study are guided by its central research question. A qualitative methodology was adopted, with primary empirical data collected through key informant interviews with stakeholders from both local and INGOs who have direct experience working on humanitarian and development projects in the Rohingya response in Cox’s Bazar. Interviewees were selected using judgmental sampling, targeting individuals with relevant expertise and experience in implementing the localization agenda. A total of 20 purposively selected semi-structured interviews were conducted between November 2024 and March 2025, comprising 15 representatives from local and national

NGOs and 5 Bangladeshi nationals employed by INGOs. The interviews were guided by a semi-structured questionnaire collaboratively developed by the authors to align with the study's objectives, emphasizing local perspectives while also incorporating insights from international organizations. Throughout these processes, a flexible approach was maintained, allowing participants to share their perspectives and experiences regarding the factors contributing to the unintended consequences of implementing localization in the Rohingya response. Interviews typically lasted 30–50 min and were conducted in both Bengali and English.

Notably, reflexivity was central to the data collection process, with the authors continuously reflecting on their positionality and roles as researchers throughout the study. The authors' positionalities offered a distinctive lens for generating nuanced, reflexive insights. Drawing on extensive firsthand experience with Rohingya refugees and multiple field visits for academic research, they combined theoretical rigor with practical relevance. One author is a practitioner, and the other is an academic; both are Bangladeshi nationals. As native Bengali speakers intimately familiar with the region's cultural norms, sociopolitical dynamics and value systems, they employed reflexive methodologies to critically examine their own assumptions, thereby mitigating bias and enhancing the rigor of the interview process. Interviews that were conducted in Bengali were subsequently translated into English and transcribed for data processing. Data were analyzed using reflexive thematic analysis (Braun and Clarke, 2021), with open coding performed manually in MS Word. This rigorous, inductive approach facilitated the identification of key factors, organized into four broader themes.

5. Findings of the study

The analysis of the data from local and international humanitarian actors highlights the underlying factors of the unintended consequences of the implementation of the localization in the Rohingya response. The identified broader themes are presented as follows:

5.1 *Marginalization of LNGOs in need assessment and program design*

Although the localization agenda is intended to decentralize power and empower local actors, it often reinforces existing power asymmetries embedded within donor compliance mechanisms in the Rohingya response. A major causal effect of these unintended consequences, identified across interviews, was the marginalization of LNGOs in the need assessment and program design processes. During interviews, many participants (1, 2, 3, 6, 7, 8, 16, 17 and 18) explicitly criticized the humanitarian governance structure, highlighting that LNGOs are frequently excluded from these critical initial stages of program planning and decision-making. One participant postulated that “despite the rhetoric of local leadership, key decision-making power, especially over financial and strategic matters, remains largely in the hands of international actors” (Participant 2). The power imbalance in the Rohingya response, particularly evident in funding allocation processes, marginalizes LNGOs, which continue to rely heavily on INGOs for resources. At the same time, the local proprietorship-oriented organizational culture of the local organizations in Cox's Bazar prioritizes implementation work directed by donors over investments in organizational development (Mannan, 2024). This dynamic not only undermines the objectives of the localization agenda but also perpetuates a cycle of dependency, constraining LNGOs' ability to exercise leadership and take ownership of humanitarian responses. Consequently, progress toward genuine localization is stalled, and the long-term sustainability of interventions is compromised.

Another respondent from an LNGO representative stated that,

In certain instances, INGOs and UN agencies engage LNGOs as contractors to swiftly implement humanitarian initiatives. This approach has fostered a culture of short-term dependency in partnerships, limiting LNGOs' ability to develop as sustainable entities and affecting both their organizational strength and staff capacity (Participant, 8).

INGOs and UN agencies often conduct needs assessments independently, with insufficient consultation with local actors. Several interviewees (Participants 3, 4, 5, 7, 9, 10, 17, 18 and 20) identified the complex compliance requirements imposed by INGOs and donors as significant barriers. These bureaucratic hurdles often hindered LNGOs' ability to manage funds effectively and efficiently, slowing down the implementation of much-needed programs.

Another respondent highlighted the competitive dynamics between local and mid-level LNGOs, stating that,

With program implementation largely entrusted to NGOs aiming to develop local leadership, smaller and mid-level NGOs often struggle to attain frontline leadership roles while competing with larger organizations. Due to limited capacity, these smaller NGOs may be confined to the role of implementation partners rather than serving as strategic partners with a more proactive and pivotal role (Participant, 17).

The marginalization of LNGOs led to less effective interventions and reinforced a sense of disempowerment among local organizations and failed to address the specific needs of the affected communities in Cox's Bazar. Consequently, the critical decisions regarding program design and needs assessment remained under the control of international agencies in the Rohingya humanitarian response.

5.2 Operational inefficiencies and fragmentation

Paradoxically, the implementation of localization in the Rohingya response resulted in operational inefficiencies, largely stemming from an emphasis on local involvement without adequate capacity-building support. While LNGOs played an integral role in delivering humanitarian assistance, many faced significant challenges in scaling up operations to match the magnitude of the crisis or comply with international standards. These limitations in infrastructure, technical expertise and resources frequently hindered the effectiveness of their interventions, resulting in operational fragmentation and inefficiencies. As one practitioner noted during the interview,

Due to their limited resources and constrained funding capacity, local and smaller NGOs are unable to offer equitable employment opportunities, particularly in terms of competitive salaries and incentive packages. In contrast, larger and financially stable organizations provide more attractive compensation and benefits, leading to higher staff retention as trained personnel are drawn to these better opportunities (Participant 5).

The fragmentation of efforts was further compounded by a noted "competition for resources" among LNGOs in Bangladesh. Donor-driven funding priorities often favored larger, more established national NGOs, making it difficult for smaller, Cox's Bazar-originated LNGOs to secure financial support or gain recognition. This competitive environment contributed to a fragmented humanitarian landscape, marginalizing vulnerable populations served by smaller organizations and leaving their needs inadequately addressed in favor of better-resourced actors with stronger access to donor networks.

Another key challenge identified in this study was the gap in technical expertise among LNGOs. While deeply connected to the local context, many LNGOs lacked the specialized knowledge and operational capacity required to manage large-scale, complex humanitarian programs effectively. Consequently, local actors often struggled to meet the standards and expectations set by international organizations and donors, resulting in a fragmented and less coordinated response. This disconnect between planners and implementers resulted in operational inefficiencies, with interventions often failing to meet their intended objectives and necessitating repeated adjustments. Such fragmentation not only generated inefficiencies in resource allocation but also undermined the holistic approach necessary for addressing complex humanitarian crises. Duplication of efforts among local and international actors further complicated the response, resulting in wasted resources and missed opportunities for

collaboration. Consequently, marginalized populations, including women and communities with limited access to formal networks, remained underserved.

5.3 Financial dependency and sustainability challenges

A significant unintended consequence of the localization agenda has been the deepening financial dependency of LNGOs on INGOs and donor agencies, creating substantial sustainability challenges. Despite the rhetoric of local empowerment and the promise of more sustainable, locally led responses, many local organizations reported limited access to direct funding. One representative from a local organization noted that,

We frequently face challenges related to insufficient funding and short project durations, which limit our ability to implement long-term, sustainable initiatives. Many humanitarian interventions prioritize immediate needs, leaving minimal opportunity to address underlying systemic issues or invest in capacity-building efforts that could foster more sustainable outcomes (Participant, 7)

Local organizations expressed frustration over the lack of multi-year, flexible funding that would allow for long-term planning and implementation. While counterfactual, in the absence of an actual localization approach in the Rohingya response, financial dependency would likely persist, but primarily through executing externally designed programs rather than through intended locally led initiatives for cost-effective action.

Moreover, LNGOs reported significant challenges in retaining skilled staff, a critical component for building long-term organizational capacity. The financial constraints of local NGOs limited their ability to offer competitive salaries or benefits to skilled staff, compared to larger international organizations. Additionally, the recruitment of skilled staff by INGOs, which offered higher salaries and enhanced professional development opportunities, disrupted program continuity and undermined LNGOs' efforts to build a stable, competent workforce capable of independently managing and effectively leading humanitarian interventions in the Rohingya response. One INGO participant contended that,

International NGOs and UN agencies have been instrumental in strengthening the organizational capacity of LNGOs by providing technical support, training, and resources. However, in some cases, these capacity-building initiatives are not fully aligned with humanitarian principles, organizational objectives or mandates, eventually fail to prioritize the development of long-term self-sufficiency (Participant, 14).

The inability to retain skilled workers reduced organizational effectiveness, as experienced staff – familiar with the local context and community relationships – were replaced by less experienced people working in humanitarian contexts, even while adhering to core humanitarian principles and values. This high turnover further eroded LNGOs' capacity to cultivate the contextual expertise required to lead sustainable humanitarian and development responses. Consequently, the interplay of limited financial autonomy and challenges in retaining skilled staff significantly constrained LNGOs' ability to attain long-term independence and resilience, undermining the objectives of localization commitments.

5.4 Donor-driven patron–client-oriented localization

Although localization is framed as empowering local actors, it often operates as a donor-driven process embedded within patron–client dynamics in the Rohingya response (Sakib *et al.*, 2025), reinforcing dependency rather than fostering autonomy. LNGOs were frequently held fully accountable for the outcomes of humanitarian programs, while INGOs and UN agencies faced little scrutiny for their roles in flawed needs assessments, program design and strategic decision-making. As one respondent from a national organization pointed out, “LNGOs are blamed for failures, but the international partners are rarely held accountable for their role in the process” (Participant, 19). This accountability gap unfairly burdened LNGOs with clientelist roles for issues originating from patronage by their international counterparts. Another participant states that

One of the key challenges encountered is ensuring that allocated funds align with donor compliance and reporting requirements. International agencies often impose stringent regulations on the distribution of funds across various sectors, such as water, sanitation, and hygiene (WASH), food security, and protection. Additionally, they enforce specific limitations on administrative costs, which can at times restrict organizational flexibility in resource allocation (Participant, 4).

Despite being central to the implementation of the localization agenda in the Rohingya response, LNGOs were often excluded from strategic decision-making processes that shaped program design and direction. Moreover, reliance on project-based funding, contingent on external priorities, constrained LNGOs' ability to maintain consistent programs and build sustained impact. This dependence on external funding also rendered local organizations vulnerable to shifts in donor patronage priorities or fluctuations in global funding, further exacerbating clientelist mindsets. In practice, LNGOs often remain subcontractors within a donor-dependent system, perpetuating localization as a "business model" that eventually limit their agency in influencing the scope and priorities of humanitarian interventions independently. Thus, the absence of genuinely collaborative planning not only reduced the effectiveness of interventions but also undermined their long-term sustainability, perpetuating a patron–client dynamic between international and local actors.

6. Discussion

The findings illustrate that while the localization agenda is rhetorically committed to empowering local actors, it has, in practice in the Rohingya response, produced a range of unintended consequences. Factors such as financial dependency, exclusion from decision-making processes, operational inefficiencies and donorized patron–client implementation structures have collectively contributed to the continued marginalization of LNGOs. These outcomes reflect both anticipated and unanticipated unintended consequences (Jabeen, 2018), shaped by the logics of humanitarian governance and donor-driven priorities. Consistent with Lie's (2024) concept of *developmentality*, the discourse of localization often conceals the persistence of hierarchical power relations, in which LNGOs are invited to participate yet remain subordinate to INGOs, UN agencies and donor communities – a dynamic that can be described as *donorization*. Although the localization agenda aspires to redistribute power and enhance local agency within humanitarian responses, the entrenched donorization of the Rohingya response in Cox's Bazar has significantly constrained its transformative potential.

Furthermore, donor compliance requirements within foreign-funded projects perpetuate donor-driven agendas, whereby donors ultimately dictate funding flows and shape the design of localization in the Rohingya humanitarian response. Despite the commitments made by the international community under the *Grand Bargain* and the *Charter for Change*, outcomes that are partly anticipated in locally led initiatives are simultaneously reinforced by systemic donor logics that privilege larger, more established organizations in Cox's Bazar. As a result, smaller, Cox's Bazar-based LNGOs are often marginalized in funding allocation processes. This dependency not only constraints the autonomy of local organizations but also undermines the principles of "partnership with dignity." Moreover, it perpetuates a top-down decision-making structure in which major strategic decisions are determined by INGOs and UN agencies – frequently without a nuanced understanding of local needs and priorities.

Moreover, recent global funding cuts – particularly reductions in United States Agency for International Development support for Rohingya response projects – illustrate the vulnerability of the humanitarian ecosystem when reliant on external aid and donations. These developments underscore how financial considerations shape humanitarian priorities and reveal the disproportionate influence of major donors, who not only finance projects but also ultimately determine strategic priorities and key decision-making processes. Despite the normative objectives of localization, which aim to transfer power and control to local actors, existing financial and operational structures continue to

reproduce the dominance of international actors, echoing [Lie's \(2024\)](#) argument on *developmentality*. Local organizations may be invited into coordination spaces, but their voices are frequently marginalized, reinforcing hierarchical structures and undermining the pursuit of genuine localization.

Moreover, capacity-building initiatives provided by INGOs, while valuable in some respects, often fail to confront the structural constraints that undermine the long-term sustainability of LNGOs in Cox's Bazar. These initiatives frequently overlook systemic inequities in funding distribution and persistent salary disparities. A significant unintended consequence of this dynamic relates to the widespread *staff poaching*, whereby skilled local personnel migrate to better-paying INGOs. Although presented as evidence of local recruitment, this practice depletes LNGOs of crucial expertise – in some cases their only technical capacity – and limits their ability to compete within an increasingly competitive market-oriented humanitarianism. Additionally, a new hierarchy has emerged in Cox's Bazar where larger, better-resourced LNGOs are privileged over smaller, community-based actors due to their greater ability to meet donor requirements. This structural stratification reduces the diversity of local participation, fosters fragmentation and intensifies competition for “refugee capitalism” ([Khan, 2024](#)). From an unintended consequences perspective, such outcomes are both foreseeable and entrenched within prevailing donor architectures, where localization is often reduced to subcontracting rather than genuine empowerment in Cox's Bazar ([Khan and Kontinen, 2022](#)).

On the ground, the exclusion of LNGOs from strategic planning processes – such as needs assessments and program design – represents an unanticipated outcome linked to the *imperious immediacy of interests* ([Jabeen, 2018](#)). This exclusion underscores a growing disconnect between the intentions of the localization agenda and its practical implementation over time. In the contemporary context of shrinking aid budgets, INGOs are likely to withdraw once funding declines, whereas local NGOs will continue to operate in Cox's Bazar. Strengthening their capacity and leadership is therefore essential. However, the emergence of “competitive humanitarianism,” whereby only a handful of larger LNGOs partner with INGOs ([Roepstorff, 2020](#)), reflects what [Merton \(1936\)](#) identified as a foreseeable yet unintended outcome of such interventions.

Moreover, the prevailing assumption that LNGOs lack the capacity to adhere to core humanitarian principles highlights a fundamental contradiction within the localization discourse. The emphasis on financial independence and compliance with humanitarian norms – such as neutrality and impartiality – often creates ethical dilemmas for local actors deeply embedded within their communities. Their necessary engagement with government stakeholders, for instance, can expose them to accusations of bias. Nevertheless, such unintended consequences may be *neutral* in nature – neither causing harm nor producing significant benefits, since humanitarian workers, whether local or international, are ultimately bound by universal humanitarian principles.

Overall, these dynamics reflect the *foreseeable unintended outcomes* of emphasizing a rhetorically driven, locally led localization agenda over genuinely transformative approaches, generating cycles of dependency and fragmentation within the Rohingya response. Additional unintended consequences – such as exclusion from needs assessments and operational fragmentation – stem from ignorance, systemic errors and the imperious immediacy of interests, which create structural asymmetries between LNGOs and international actors. This study also illustrates that, rather than dismantling hierarchical structures, localization has reproduced new layers of inequality within the LNGO sector. Unless the systemic challenges of financial dependency, rigid donor compliance frameworks and asymmetrical accountability structures are effectively addressed, the intended outcomes of localization in the Rohingya humanitarian response will remain unaddressed. In Cox's Bazar, these structural constraints continue to limit the capacity of local NGOs to exercise genuine leadership, perpetuating cycles of dependency and undermining the potential for a truly transformative, locally led humanitarian response.

7. Conclusions

While localization aims to address entrenched power asymmetries between local and international actors, it also generates a range of unintended consequences that hinder the effectiveness of locally led humanitarian responses. This study has examined the core factors contributing to these unintended outcomes within the Rohingya response, particularly where donor-driven agendas intersect with local practices. These consequences not only perpetuate reliance on externally imposed frameworks but also undermine capacity-building efforts intended to empower LNGOs. Furthermore, the legitimacy and recognition of local organizations remain significant challenges, restricting access to direct funding and reinforcing dependence on INGOs. Collectively, these dynamics raise critical questions about the ability of LNGOs to independently manage large-scale humanitarian interventions and cast doubt on the extent to which the intended effects of localization are realized in the Rohingya response.

While the overarching goal of decentralizing decision-making and empowering local organizations is commendable, the implementation of localization in the Rohingya response has generated several foreseeable unintended consequences. These outcomes perpetuate existing power imbalances, create operational inefficiencies and deepen financial dependency on INGOs, thereby undermining the very principles of localization. Nevertheless, some positive unintended effects have emerged, particularly in enhancing the legitimacy and accountability of genuinely local organizations in the Rohingya response, compared to affiliated NGOs operating under “business-as-usual” practices, especially in the perception of international donors and partners. The increased involvement of local actors in large-scale humanitarian efforts has brought them recognition for their operational effectiveness and for bridging international aid with local communities. This visibility has, to some extent, strengthened their position within the broader humanitarian ecosystem, providing greater access to funding, resources and partnerships. However, these gains remain limited in scope and insufficient to address the deeper structural challenges identified in this study, which continue to contribute to unanticipated unintended consequences and constrain the transformative potential of localization in the Rohingya response.

For localization to achieve both sustainability and transformative impact, several critical shifts are required. First, LNGOs must be engaged as equal partners and co-creators of policy and program decisions throughout all stages of humanitarian governance in Cox’s Bazar – from needs assessment to evaluation – rather than being relegated to subcontracting roles. Second, funding structures should prioritize multi-year, flexible resources that enable local actors to invest in organizational capacity, long-term sustainability and internal culture. Third, INGOs and UN agencies must move beyond tokenistic partnerships to ensure genuine transfer of technical and operational capacities to locals, while LNGOs must strengthen their organizational culture and transparency to enhance credibility and resilience (Mannan, 2024). These measures are especially vital for facilitating localized responses aimed at mitigating both anticipated and unanticipated unintended consequences, such as budgetary constraints, natural disasters or sudden global pandemics.

Overall, this study on the unintended consequences of localization in the Rohingya response demonstrates that, while localization has created avenues for increased local engagement and positioned LNGOs as key implementation partners, the donorization of the response continues to produce significant unintended outcomes – some foreseeable, others unforeseeable. These outcomes impede the effective realization of localization by reinforcing financial dependency, perpetuating inequalities and entrenching a patron–client model within humanitarian governance. The findings of the study indicate that, as currently operationalized, the localization agenda has intensified competition among local organizations, disproportionately favoring larger, resource-rich entities and generating new layers of inequality within the LNGO sector in Cox’s Bazar. Such dynamics constitute unintended consequences of localization of the Rohingya response, as they undermine the intended goals of empowerment and capacity-building while constraining smaller, less-resourced organizations from meaningful participation in decision-making processes, thereby limiting

the inclusivity and overall effectiveness of humanitarian interventions. Therefore, addressing structural power imbalances, inequitable funding flows and accountability asymmetries presents a critical opportunity to move localization from rhetoric to practice. In Cox's Bazar, the intended outcomes of a genuinely localized humanitarian response require equitable partnerships grounded in trust, dignity and complementarity, where local actors are empowered not only to implement programs but also to co-produce policies and shape strategic decision-making in the Rohingya response.

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Authors' contributions

The first author has the main contribution (70%) for the data analysis, discussion, conceptualization, data analysis, discussion, and writing of the article. The second author has contributed (30%) to the data collection, coding, data analysis and policy recommendation section.

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Notes

1. In this article, "local organizations" refers to both Cox's Bazar-originated local organizations and Bangladeshi national NGOs, irrespective of their size or operational scope.
2. Theory of change (ToC) can be understood as an approach for describing the underlying assumptions that explain how and why an initiative is expected to achieve its intended outcomes (Anderson, 2004).

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