

Defining refugee-led organisations: An analysis of UNHCR's 2023 definition

Research Brief

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Introduction

In February 2023, the United Nations High Commissioner for Refugees (UNHCR) quietly released its first ever definition of a 'refugee-led organisation', marking a significant moment in the agency's history. This definition is both procedurally important and politically symbolic. It offers clearer guidance as to how UNHCR defines, and is likely to engage with, such organisations in the future. But beyond this, it also contributes to the increasing recognition of the importance of refugee-led organisations in humanitarian responses.

For many, UNHCR's newfound recognition of refugee-led organisations as legitimate stakeholders in policy and programming is likely to be considered a welcome development. Humanitarian responses to displacement have been approached for many years through a top-down governance model where local refugee-led organisations have received very little attention or support.¹ Yet, the lack of guidance and deliberation on how UNHCR plans to integrate this definition into its policies and programs, as well as the absence of proper consultation processes before its release, have raised concerns about the organisation's commitment to inclusivity and collaboration with refugee-led organisations going forward.

How does UNHCR define refugee-led organisations?

According to [UNHCR's new definition](#), a refugee-led organisation is:

An organization or group in which persons with direct lived experience of forced displacement play a primary leadership role and whose stated objectives and activities are focused on responding to the needs of refugees and/or related communities.

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This definition contains several sub-definitions. An ‘organization or group’, for example, refers broadly to ‘individuals that work together through collective action as either formal or informal, registered or unregistered, or virtual or physical entities, initiatives or networks’. ‘Persons with direct lived experience of forced displacement’ includes asylum seekers, refugees and former refugees. ‘Primary leadership’, according to this definition, is when refugees ‘have the sustained ability to make a substantive contribution to the organization’s decision-making’.²

Although it is important to read the definition in full to understand its scope and limitations, several elements are worth noting here. One is the explicit recognition that refugee-led organisations often respond not only to the needs of their own communities but ‘related’ communities as well. This may include host communities in countries of asylum and other marginalised groups. This recognition is significant because it highlights that refugee-led organisations are not focused solely on their own interests but rather are critical actors in humanitarian responses and law and policy development more broadly.

A second element of note is the decision to include not only refugee-led organisations that engage in protection services but also those that engage in advocacy. This recognition marks a crucial acknowledgment of the collective political agency of refugees that is often overlooked in international refugee law and policy. It is a significant procedural step towards enabling refugees to shape laws and policies that affect their lives. Third, it is worth noting that the definition does not encompass organisations led by communities other than refugees, such as communities who have experienced internal displacement, statelessness, trafficking, and/or displacement related to the impacts of disasters or climate change.

How is this definition likely to resonate?

Whether refugee-led organisations and other stakeholders embrace UNHCR’s definition is likely to depend on the context in which they are situated, the intended application of the definition and whether inclusive or exclusive classifications are preferred. Some stakeholders may welcome, for example, the inclusion of former refugees within the definition, highlighting how this embraces a greater diversity of viewpoints, along with the meaningful engagement of diaspora communities. Other stakeholders may emphasise alternatively the importance of prioritising the inclusion of organisations with ongoing experiences of displacement. In some contexts, these organisations may have unique access to communities and understandings of issues that former refugees do not possess. Both perspectives are valid. They highlight the issues that arise when it is not made explicit how the definition will be used in practice.

Likewise, UNHCR’s definition is broad enough to encompass a range of informal governance structures, in recognition of the challenges refugee-led organisations often face in registering their initiatives within countries of asylum and beyond. Yet, there will equally be occasions where stakeholders will argue for the privileging of more formalised structures in the humanitarian system. This may be because they are de facto evidence of sustainable organisational frameworks, or because they reflect an important commitment to governance and accountability. Once again, context matters.

Tensions such as these indicate that there is likely to be no one perfect definition to identify and explain refugee-led organisations conceptually. Broad inclusive categorisations enable flexibility in application. However, they also run the risk of undermining the legitimacy given to such organisations in practice. Around the world, refugee-led organisations experience a

variety of challenges, so it is important to take into account the diversity of these experiences and adapt accordingly.

What alternatives were considered?

When reflecting upon the merits of UNHCR's new definition, it is worth noting that it could have been much worse. Less than a year prior to the release of the definition, in May 2022, UNHCR shared with civil society actors its provisional recommendations on localisation and climate action ahead of the 2022 UNHCR-NGO Global Consultations. In these provisional recommendations, UNHCR used the term Persons-of-Concern-led Organizations (or PoC-LOs) in several of its draft recommendations, rather than the more commonly used term refugee-led organisations.

In response to these draft recommendations, an informal consortium of refugee-led networks and others (including myself) advocated strongly that the term 'Persons-of-Concern-led Organization' is not an appropriate label and should not be used by UNHCR and other stakeholders. In a [submission on 25 May 2022](#) to UNHCR, this consortium noted that the term reinforced a subordinate status for organisations and initiatives led by affected communities by inherently defining them in relation to their eligibility for protection by UNHCR. They also stated that the term disregards alternatives which refugees and other forcibly displaced persons have themselves used.

Perhaps more significantly, the consortium also flagged broader issues associated with referring to refugees and other forcibly displaced persons as 'persons of concern'. They noted that '[i]n a global context where refugees and other displaced persons often experience xenophobia, racism, homophobia, and other forms of prejudice... this term can implicitly reinforce feelings of worry and inadvertently contribute to perceptions of refugees and other displaced persons as security threats'.³ This is due to the dual meaning of the word 'concern'. As the [Oxford Dictionary](#) notes, while the word 'concern' can be understood as meaning 'a desire to protect and help somebody or something' or 'something that is important to a person, an organization, etc', it can equally be used to indicate 'a feeling of worry, especially one that is shared by many people'.⁴

UNHCR, to its credit, responded positively to this feedback. The [Final Recommendations](#) presented during the 73rd session of the Executive Committee in October 2022 removed all references to Persons-of-Concern-led Organizations. Instead, the recommendations adopted a range of other formulations, such as 'organizations led by forcibly displaced and stateless people', 'community based organizations' and 'organizations led by refugees, asylum seekers, internally displaced and stateless persons'. Beyond this, [UNHCR also told NGO representatives](#) at the 2022 UNHCR-NGO Global Consultations that its use of the term 'persons of concern' would be phased out and no longer used in any context. This was a welcome outcome, although there is yet to be a formal announcement of this shift and more work is needed to ensure it happens in practice.

A problematic consultation process

Upon releasing UNHCR's first ever definition of a refugee-led organisation, concerns have also been raised about the consultation processes that were deployed to reach this definition.

At the end of its definition of a refugee-led organisation, UNHCR provides its only explanation of the consultation process it adopted, vaguely stating that:

This definition builds on consultations with organizations led by displaced and stateless persons, NGOs and academics; it was then field-tested by RLOs in 14 country operations.⁵

However, it provides no further clarification as to how engaged organisations contributed to the process, or what field-testing a definition actually involves.

From my own knowledge of the process, it was promising in the early stages of drafting to see UNHCR actively seek the input of refugee leaders and other stakeholders with expertise on refugee-led organisations around the world. This input helped shape the scope and content of the definition. However, this process of engagement ultimately had several shortcomings. Notably, UNHCR never established a public and transparent process for input into the development of this definition, despite commitments to involve refugees inclusively in all decisions that affect them. This meant that many refugee-led organisations and other stakeholders were excluded from the process entirely. UNHCR also failed to report back and inform key stakeholders about the release of the definition, including many stakeholders who voluntarily and in good faith provided input into the drafting process in its initial stages in late 2021. Additionally, UNHCR failed to establish any mechanism for fair and equitable remuneration for people with lived experience participating in the process.

The development of this definition was a lost opportunity for UNHCR to promote both best practice and a new way of working collaboratively with refugee-led organisations. The risk is that these shortcomings may have resulted in disempowering experiences for both participants engaged in the process and those who were not given the opportunity to provide input. These shortcomings may have also reinforced community perceptions that UNHCR only engages in consultation for the purposes of ideational extraction and to legitimise its work in the eyes of others.

Where to from here?

Despite the consultation process' shortcomings, UNHCR's new definition of a refugee-led organisation presents an opportunity to ensure that refugee-led organisations are more effectively recognised and supported in the international refugee regime from now on. In recent years, a significant body of research from different parts of world has highlighted how refugee-led organisations have addressed unmet needs and provided substantial support to their own communities and others.⁶ This support has been provided despite refugee-led organisations experiencing several structural, legal, and social barriers when undertaking this work and despite limited financial support from States, UNHCR, donors and others.

Although the development of a definition of refugee-led organisation may be perceived as a technical, procedural exercise, it is symbolically significant in that it raises visibility to refugee-led organisations and helps legitimise their role as important stakeholders in policy and programmatic work. While UNHCR has given no indication, nor led any consultation process, as to how it plans to integrate this definition into its policies and programs, internally the definition could be deployed in a variety of areas to help better understand and engage with refugee-led organisations.

The definition could, for example, be a starting point for the engagement of refugee-led organisations as UNHCR implementing partners. In UNHCR’s internal audits, the definition could be used to create clearer data on how much support refugee-led organisations receive in comparison with other stakeholders.⁷ Beyond this, the definition could assist in facilitating the inclusion of refugee-led organisations in decisions relating to the relocation of refugees from one country to another. This includes, for example, decisions such as the design and implementation of tripartite agreements for the voluntary repatriation of refugees to their country of origin, and decisions surrounding the provision and allocation of resettlement. Each of these applications of the definition would lead to a more inclusive and meaningful engagement of refugee-led organisations and their representatives in decision-making processes that affect them.

Endnotes

¹ Kate Pincock, Alexander Betts and Evan Easton-Calabria, *The Global Governed? Refugees as Providers of Protection and Assistance* (Cambridge University Press, 2020) 2.

² UNHCR, *Definition: Refugee-led Organization* (UNHCR, January 2023) <<https://www.refworld.org/docid/63e658fc4.html>>.

³ Tristan Harley et al, *Use of the term ‘Persons-of-Concern-led Organizations’* (Act for Peace, 25 May 2022) <<https://actforpeace.org.au/app/uploads/2022/06/publications-use-of-the-term-poc-led-organizations.pdf>>.

⁴ Oxford Dictionary, *Definition: Concern (noun)* <https://www.oxfordlearnersdictionaries.com/definition/american_english/concern_2>.

⁵ UNHCR, *Definition: Refugee-led Organization* (UNHCR, January 2023).

⁶ See further: Oroub El Abed et al, *Refugee Communities Mobilising in the Middle East: Refugee-led Organisations in Jordan, Lebanon and Turkey* (Local Engagement Refugee Research Network and Centre for Lebanese Studies, April 2023) <https://carleton.ca/lerrn/wp-content/uploads/LERRN_RLO_Study_Middle_East_Final_Report_may_16.pdf>; Andhira Yousif Kara et al, *Refugee-led Organisations in East Africa: Community Perceptions in Kenya, Uganda, Ethiopia and Tanzania* (University of Oxford Refugee-led Research Hub, September 2022) <<https://refugeeledresearch.org/wp-content/uploads/2022/09/Refugee-Led-Organisations-in-East-Africa-Regional-Full-Report.pdf>>; Diana Essex-Lettieri, *Understanding RLO Impact: A Metasynthesis of Five External Impact Evaluations Covering Programs run by Refugee-Led Organisations (RLOs)* (Diana EL Consulting, September 2022) <https://www.refugeeslead.org/_files/ugd/3caee8_429d194c6e1149e797b654a3257436a6.pdf>; Mohammad Baqir Bayani et al, *In Endless Transit: Contributions and Challenges for Refugee-Led Initiatives in Indonesia* (Act for Peace and Asia Pacific Network of Refugees, forthcoming); Jessica Olney et al, *Insecurity, Risk and Resilience: The Contributions and Challenges of Refugee-led Initiatives in Rohingya Refugee Camps in Bangladesh* (Act for Peace and Asia Pacific Network of Refugees, forthcoming).

⁷ For further analysis on these potential applications, see Tristan Harley, *Beyond Storytelling: Refugee Participation in Decision-Making Processes* (University of New South Wales, June 2022) <<https://doi.org/10.26190/unsworks/24210>> 160–162.