

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.

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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 definitio/Attached 05 Tw -3 s s,rga4G2Thdrs inin

