

Cash for Rent Handbook

Miriam Lopez-Villegas, Shelter Adviser
NRC Afghanistan, June 2018

Contents

Overview.....	2
Cash for rent purpose and general description	3
Shelter Market Assessments	4
Defining the geographic scope of the assessment and geographic location of the program	5
Set the team, the time and the tools for the assessment	6
Set the key analytical questions	6
Household surveys and key informant interviews	8
Ensure inclusiveness.....	10
Analyze the data	11
Cash for Rent Programme Design and Implementation.....	12
Identification of Beneficiaries.....	13
Identification of Adequate Housing Units	14
Value, frequency and length of the assistance	16
Cash Delivery mechanisms.....	18
Transparency, Accountability and Internal Controls.....	21
Further Considerations and Core Competencies integration	24
Camp management and UDOC (urban displacement and outside of camps) programmes	24
ICLA (information, counselling and legal assistance).....	24
Protection Considerations.....	25
Bibliography and Resources.....	26

Overview

This handbook provides background information, discussion of best practices and requirements for proposed standard operating procedures (SOPs) on Cash-for-Rent (CfR) interventions for use by the Norwegian Refugee Council (NRC). It is intended as a backgrounder for those directly involved in the design and delivery of Cash-based Interventions (CBIs), and for colleagues from other humanitarian agencies or local NGOs working on related initiatives. Teams working on related programming might find this handbook useful to articulate the purpose, challenges and proposed outcomes of CBIs. This document might also serve as a resource for the Shelter Cluster as well as for implementing staff, who will find information that can be summarized, edited and translated as needed. Additionally, the analysis built from international experience and needs assessments contained in this document will be useful in contextualizing funding proposals for the realities and challenges of this type of programming in Afghanistan.

“Cash-based assistance is, in brief, one of the most significant reforms in recent years. There is no longer serious dispute about whether cash can significantly improve humanitarian aid. Established humanitarian actors now invest in cash at greater scale and more consistently than ever before. It is at the forefront of innovation for people in crisis. However, while the overall argument is won, important debates continue about how cash-based assistance should best be used. This is because we are still learning about how best to use cash in different contexts and because it challenges established ways of operating in the humanitarian sector.” Jan Egeland, Secretary General, NRC – Foreword on *The State of World’s Cash Report Cash Transfer Programming in Humanitarian Aid*. CaLP, 2018.

These guidelines are part of NRC’s effort to continue to learn and establish ways we can efficiently provide humanitarian assistance: specifically access to **adequate shelter** through a CBI.

NRC has scaled up CBI investing in structured capacity building over several years. [*Cash alone is not enough: a smarter use of cash*](#) summarizes NRC’s position on cash based interventions at the strategic, and organizational level. Systematic capacity building is needed within each country programme to improve the quality of the services we provide, and to adapt to the vast range of contexts. Equally important is the capacity to adapt to the dynamics every programme inexorably goes through. Changes are expected as CBIs gather momentum among partners, increasing the demands on local financial institutions assisting in the distributions of a growing amount of cash. Capacity building is paramount for the designated Operational team (e.g. Shelter Team) but also with involved members of the Support Department.

Among humanitarian actors, an organization’s own capacity has been recognized as one of the main barriers to successfully employing CBIs as a tool for shelter responses. Many institutional donors have re-examined prior misconceptions and objections to CBIs and now endorse these wholeheartedly. **Still, some skepticism remains from the implementing staff.** This document aims to address some of these concerns providing guidance on key factors involved in integrating a Cash for Rent (CfR) programme.

NRC has been in Afghanistan since 2003, providing assistance to returning refugees and internally displaced populations. NRC will continue to respond within its core competencies: Camp management (including the urban displacement and out of camps, UDOC, approach); education; livelihoods and food security; information, counselling and legal assistance (ICLA); shelter and settlements; and, water, sanitation and hygiene promotion (WASH). NRC’s CBI in emergency response in Afghanistan continues to expand its scope. In 2017 and 2018, NRC has provided beneficiaries with Unconditional Cash Transfers (UCT), Cash-for-Shelter (CFS) and Cash-for-Work (CFW). It should be noted, however, that CBIs are not a programme in itself, but rather a modality to deliver assistance.

As stated in NRC Programme Policy, *Shelter is essential for the physical protection and privacy of people affected by displacement, allowing them to lead lives in a safe, supportive and culturally appropriate setting.*¹ “In the past emergency shelter support was through the provision of a tent, however NRC has concerns that this approach is not sufficient to meet basic shelter needs. In response NRC has been piloting an Emergency Cash for Shelter pilot which provides households with a conditional cash grant to be used to rebuild or repair damaged shelters.”² With the experience acquired over the past years, in NRC Post Distributing Monitoring (PDM) and project evaluation, as well as through the expertise developed through its system of advisers and specialists, NRC aims to integrate lessons learned at the national, regional and global level.

¹ NRC Programme Policy,

² NRC, 2013, *Emergency Cash for Shelter Pilot Project: Afghanistan – Evaluation*

Some of the *core values* of CBIs are that programme beneficiaries can set their own priorities. CBIs give choice and dignity to beneficiaries and kick starts local economies by increasing purchasing power. These hold valid for CfR. In terms of choice, families are able and encouraged to choose where to live. One of the main shortcoming in providing emergency shelter has been the occupancy rates, especially at newly formed camps and settlements. With CfR, families are able and encouraged to seek accommodation closer to where they might find a community network they can rely upon (even if this process might still be challenging, particularly for certain groups).

Whilst there can be incidents of exploitation and discrimination, solidarity from host communities and landlords has been crucial to receiving the influx of new arrivals into private homes. CfR recognizes this solidarity and, as with other CBI programmes, those within the local market system (in this case the rental market) also indirectly but meaningfully benefit from the programme.

Before deciding whether scaling up CfR was appropriate for the current Afghan context, alongside the continued monitoring of the needs and displacement trends, the NRC Shelter Team conducted a Shelter Market Assessment in the Easter Province of Nangahar (April to May, 2018). This exercise is referred throughout this document. The timing of this review also coincides with the work at the Shelter Cluster in Afghanistan. Various agencies have expressed to NRC their interest in exploring CfR as a cost-effective strategy and a way of responding to household preferences. NRC is a strong advocate for the appropriate use of CBI whenever evidence indicates this the most effective response in a particular context and where NRC can add value by combining CBIs with sectorial or integrated programmes (internally between NRC Core Competencies and externally in coordination with other actors).

Some of the aspects to be explored in identifying opportunities to implement CBIs include security and corruption risks; team skills and capacity; the timeliness of the response; the seasonality in the implementation; gender, age and diversity considerations; power relations and vulnerable groups; design based on best practices for an objective-oriented project; and efforts to ensure the response is locally accepted and transparent, and targets are clearly defined (in geographic, community and household basis).

Cash for rent purpose and general description

Cash-for-rent (CfR) is one modality of Cash-for-Shelter (CFS), and in a broader sense, one modality of Cash Based Interventions (CBIs) or Cash Transfer Programming (CTP).³ CBIs or CTP **are mechanisms by which a humanitarian agency transfers resources to people to meet basic needs and/or protect, establish or reestablish livelihoods**⁴.

The assistance to beneficiaries takes the form of cash payments (bank transfers or mobile money) in places where beneficiaries can access a functioning market system. In this case, through CfR, a household (HH) receives cash intended to be used for the payment of a rental accommodation under an agreement with a landlord/landlady, propriety owner, manager or broker.

According to guidelines from the Directorate General of ECHO Humanitarian Shelter and Settlements Guidelines, CBI in Shelter and Settlement interventions are expected to be **restricted** and/or **conditional**, except for MPCT (Multi-Purpose Cash Transfers) or Cash for Work (CFW) interventions provided in the very early phase of the response. This considering that CfR can be a modality for either Emergency Shelter or Transitional Shelter (with restrictions or conditions being considered for the later).

ECHO recognizes that while the introduction of *restrictions* decreases the level of choice beneficiaries have, it is considered that these conditions **add value and compliance with the programme design principles and objectives, as well as quality, materials and technical standards**. *Restrictions* are applied in Shelter programming to increase traceability on what the cash was spent on, to determine the extent the assistance had contributed towards the programme objectives, and reduce the risk of use of sub-standard materials and/or their incorrect usage. A pre-qualifying *condition* can be set to improve beneficiaries' security of tenure (for instance, requiring them to sign and present a rental agreement before receiving the assistance). ECHO also suggests that beneficiaries might be accompanied in searching for and selecting appropriate accommodation, which could include informing them on local regulations, contracts and practices – with tailored training for the understanding of the rights and obligations of tenants.⁵

³ CBI, CTP and other variances refer to the same: The assistance to beneficiaries in the form of cash payments, bank transfers or mobile money – where beneficiaries can meet their own needs in the marketplace.

⁴ CaLP Basic CTP Training

⁵ 2017, DG ECHO, Humanitarian Shelter and Settlements Guidelines

“Rental subsidies have long existed as a form of support within modern social welfare systems in many countries. The use of cash-for-rent in humanitarian projects, however, is relatively new. One of the first projects to involve cash for-rent was UNHCR’s cash scheme in the Balkans in 1999 to support Kosovar refugees who were being sheltered by the host Albanian population. The rise in displacement in urban settings, especially following the Syrian crisis, has led to an increase in the use of cash-for-rent. Many refugees or IDPs, given a choice, prefer to live in rental accommodation rather than other shelter solutions such as camps or collective centres.”⁶

As described above, the aim of a Cash for Rent programme is to help beneficiaries secure, access and/or retain adequate housing for a determined amount of time. This approach requires accompaniment to protect the security of tenure of beneficiaries, reducing the risk of families been pushed into debt or at risk of eviction. **Cash for Rent is adequate where displaced families are already renting accommodation (there are units available and mutual acceptance).** In other words, CfR depends on a functional Local Shelter Market. Therefore, a first step to setting up an CfR programme is conducting a Shelter Market Assessment. This is discussed in the following section.

Shelter Market Assessments

This section outlines key considerations and required steps for conducting a Shelter Market Assessment.

If a market is not functioning, a Cash Based Intervention (CBI) will fail. In the case of Afghanistan, most housing indicators at the *macro level* show a highly dysfunctional Shelter Market (e.g. severe and chronic shortage of affordable housing, lack of enforceable building codes and extremely limited access to legal and formal land added to an also marginal access to housing financing. However, at the local / community level, the market in and around Jalalabad, in Nangahar, has evolved and adapted to self-regulate, with informal yet functional and relatively affordable and stabilized prices.

A well-executed market assessment at the local level therefore is paramount to determine whether cash can be considered as the most effective way to meet beneficiaries needs: including the need for safe and adequate shelter. In humanitarian settings, a market assessment refers to “the process of collecting market-related data to understand the key features and characteristics of a market system or the impact a disaster or crisis could have on the market system”.⁷

A market *assessment* starts with rough approximate ideas about the market system and then, gradually incorporates new information gathered from interviews and field work – repeatedly revising and refining the picture until the goal of the analysis is achieved. Market *analysis* is often mistakenly used interchangeably with market assessment; so it should be noted that market *analysis* refers to “the process of understanding the key features and characteristics of a market system based on the data collected during the assessment [...] to formulate predictions about how prices, availability, and access will develop in future, and to inform decisions about whether or how to intervene.”⁸ The market analysis will also look for multiplier effects and what risks can be anticipated (These include risks such as inflation, security and protection concerns).

There is a large range of manuals and tools to conduct Market Assessments and determine whether markets could support cash-based interventions for most commonly used commodities⁹. However, these tools and guides need to be adapted to conduct *Shelter* Market Assessments that consider the particularities and complexities of the housing and rental markets. They do not cover the service markets, which are of interest in sectors such as shelter (rental markets, construction labour markets), WASH (water markets) and education.

⁶ Créac’h Y., Sloane E., [Evaluating cash for rent subsidies](#), Global Shelter Cluster

⁷ Helene Juillard, 2017, Minimum Standard for Market Analysis.

⁸ CaLP, 2015b, Markets in Humanitarian response.

⁹ “The barriers to conducting and implementing market analysis are similar across both WaSH and shelter sectors. In conducting market analysis, many CTP resources are biased towards the Food Security and Livelihood (FSL) sector. Specifically, market analysis tools are perceived as food security tools targeted at FSL programmes, which makes it difficult for WaSH and shelter practitioners to use. Not only are the tools using FSL terminology, but they do not address complex market systems with which other sectors are involved, such as the water and rental markets (Global Shelter Cluster, 2016). For example, the water market system often has public and private vendors, formal and informal provisions, and different services in urban and rural areas. These dimensions are not addressed in the current market analysis tools but are critical to the WaSH sector (Juillard, 2014).” Altaf Almadhyan and Emily Dillon, 2016, *Market Analysis and Outcome/Impact Measurement in Cash Transfer Programming in the WaSH and Shelter Sectors in Sudden Onset Disasters*.

When focusing on *Shelter* as a sector, and within the context of chronic poverty, there are not readily indicators (adopted by the humanitarian community) to determine whether the lower-cost shelter market is functioning.

Also, information for market assessments for other commodities depend only to a minor extent on interviewing households of the target population, with most information collected through interviewing local retailers, traders, buyers or employers; wholesalers, major buyers, and importers in trading centres. The inverse is the case for a *Shelter* Market Assessment. Especially as we aim to find the supply available for an increased influx of families (meaning vacant units), information is obtained to a lesser extent from Key Informants and secondary data, and to a larger extent from scouting the communities and conducting HHs surveys.

Two key differences between a Market Assessment for *Shelter labour and materials* and a *Shelter* Market Assessment to keep in mind:

- Market Assessments for *Shelter* will respond to questions such as what would be the impact of importing in-kind construction materials? Or, can beneficiaries locally purchase construction materials if they receive cash?
- *Shelter* Market Assessments focus on rental units available in the market, and will respond to the key question: *Can the housing market respond to an increase in demand as a result of cash programmes?*

In either case, any market assessment aims to reduce the risk of humanitarian responses doing harm to existing markets; seeks to stimulate markets and market-linked livelihoods; and focuses on using humanitarian resources more efficiently.

Defining the geographic scope of the assessment and geographic location of the program

The market assessment will inform and improve the design and implementation of our interventions using and supporting local markets. Important steps include identifying villages, districts and neighborhoods with traditional linkages to displaced populations, communities placed in strategic locations, and where target populations are already living or seeking for accommodation. The Access / Security team might need to consult local authorities, other stakeholders or community elders to determine access and assess security risks as needed.

The shelter market assessment should be conducted in areas of current and/or potential intervention. In Eastern Afghanistan, the Shelter Team conducted (April – May, 2018) a Shelter Assessment in the catchment areas of the NRC Community Centers and Neighbourhood Committees supported by the UDOC project.

It would not make sense to conduct a Shelter Market Assessment in preparation of a CfR programme in geographic areas where there is not the most basic infrastructure or where this is overwhelmed already; where beneficiaries have no interest in living; where they are not accepted or where the average cost of housing would be unaffordable for vulnerable families. Experience has shown that the distance to schools and other basic services is the main factor for families moving out from the shelter covered by a CBI programme. Once these basic considerations take place, it is important to ensure that fieldwork extends to different geographical locations in the market system, and that urban and rural settings are considered.

“Analysing the rental market is considered particularly challenging by humanitarian practitioners because of the complexity of the rental market systems: formal and informal renting exist in parallel, the definition of criteria is a challenge (i.e. should the market analysis focus on one-bedroom flats, flats with access to water, etc.). The market system selection is also challenging because housing itself is a collection of different market systems. Housing or shelter is a complex consumer product composed of many types of individual commodities and services. Because of this, it may make more sense to categorise and assess a shelter/housing market not by its constituent commodities but according to its functions (e.g. how someone acquires the land and upgrades property tenure, how basic infrastructure is provided at a community level, how the house is constructed, financial and non-financial support services, and how the community develops institutions to combat insecurity). The delimitation of the geographical scope of such market analysis can also be challenging, as rental prices can fluctuate widely from one neighbourhood to another. Finally, it can be difficult to attribute the causes of price variation in the rental market system.”¹⁰

¹⁰ Helene Juillard, 2016, The International Rescue Committee, Revised PRE-CRISIS MARKET ANALYSIS (PCMA)

Set the team, the time and the tools for the assessment

The different team members implementing the Shelter Market Assessment should have complementary skills, local knowledge and technical knowledge. The team should be gender balanced and each team member with a clearly defined role and responsibility.

Members of other Core Competencies with CBI expertise or members of the Support Department / Finances Team can provide an overview of financial service providers; whilst programme teams may have a better overview of beneficiaries' access to the markets.¹¹

Further, a local team already familiar with the area should be able to collect data from all groups in a culturally appropriate manner; and help to understand and contextualize the primary and secondary data collected.

The best time to undertake a market analysis is when there is *no* immediate need for it (i.e. when there is no crisis). This is when market systems can best be observed and understood without distortions linked to a crisis. The assessment then would work as base-line data. "This non-crisis time is also the best moment to build the team's capacity and focus on raising its awareness of markets and market-related issues. Experience in humanitarian contexts underscores the importance of investing in planning and institutional preparedness to enable country teams to implement a timely and efficient response." ¹²

The investment put into conducting a market assessment should also be proportional to its purpose and estimated opportunities. The investment might also vary if CBI will be offered as a one-time assistance, a blanket distribution of a fixed amount (as an *Emergency Shelter* response); or, if the programme will aim to provide shelter for a longer term and will consider variances such as size of households and shelter units (with *Transitional Shelter* objectives).

Those undertaking the assessment should also consider funding cycles and deadlines, and the resources required to conduct a market assessment against the short lifespan of the data for markets that are not static: subject to change not only over seasons but all the more under the pressure of increased demand.

Set the key analytical questions

The assessment is determined by the key questions or issues that could influence programme-related decisions. With these questions, "a critical market analysis captures not only the market chain, but also the market environment and market services".¹³ As we focus in *affordable housing / rental / secondary units*, this general guidance can be adapted as follows:

- Can CfR be considered as the most effective way to meet beneficiaries needs, including the need for safe and adequate shelter?
- Can the housing market respond to an increase in demand as a result of a CBI, in particular CfR?
- What considerations need to be integrated into a CBI to *reduce the risk* of harming existing markets and for the opposite: *stimulate markets* and market linked livelihoods?

Carrying out a Shelter Market Assessment with clear questions will increase our understanding and enable the design of our interventions in a way that promotes resilience. Keep in mind that a Market Assessment is an iterative exercise: "the analytical questions will be refined based on the crisis scenario, the scope, and the critical market system selected".¹⁴ In other words, expect changes as the work progresses.

As mentioned at the start of this section, a market analysis starts with a rough or broad picture of the overall market situation: overall functionality of the market economy, policies, institutions, norms, general infrastructure and general market services¹⁵ and then it is redefined as market indicators are identified which can be monitored to show if a slow-onset crisis is unfolding (i.e. Early Warning System).

¹¹ 2017, Helene Juillard commissioned by CaLP, *Minimum Standard for Market Analysis (MISMA)*.

¹² 2016, Helene Juillard, The International Rescue Committee, *Revised PRE-CRISIS MARKET ANALYSIS (PCMA)*.

¹³ 2017, Helene Juillard, MISMA.

¹⁴ 2016, Helene Juillard, PCMA.

¹⁵ 2016, Helene Juillard, PCMA.

Primary and secondary data should be drawn from multiple sources and use various collection methods. Team members should also be aware of the biases of informants and interest groups. Assessment questionnaires should collect both *quantitative* and *qualitative* data – from male and female respondents – so that statistics can be analyzed as well as descriptive information from the perspective of different groups.

A desk review could provide the macro level information in terms of policies, institutions and general financing infrastructure. Where secondary data is scarce, outdated or non-reliable, key informants and other research or development agencies such as UN-HABITAT can address information gaps.

When conducting a market assessment, it is essential to inform other agencies (i.e. through the Shelter Cluster and other coordination mechanisms), to avoid duplication and to expand the scope and the depth of the study.

Degrees of coordination for assessments¹⁶
 2017, UNHCR, Needs Assessment Handbook

Uncoordinated assessments are conducted without the knowledge of or without consideration for other ongoing initiatives. They often result in multiple assessments, the use of different methodologies, and the production of various reports on similar issues, situations, or persons of concern. The results often are neither shared nor interoperable, and cannot be used to inform a joint analysis and common understanding of a situation. A lack of coordination of assessments also can cause harm to populations of concern, who may be asked multiple times about their needs by different actors, including about potentially sensitive or traumatic issues.

Coordinated assessments are planned and carried out in partnership, with results shared with the broader humanitarian and development communities, as well as with persons of concern, to identify the needs, conditions, priorities, and capacities of affected populations. Such assessments range from inter- and intra-cluster/thematic joint assessments to harmonized single-agency assessments. The two types of coordinated assessments are:

Joint needs assessments occur when multiple organizations have an interest in using similar data collection methodologies to conduct an assessment in specific geographic locations, or when organizations have an interest in the same thematic area. Data collection, processing, and analysis take place as a single process among agencies within and between clusters/thematic areas, and lead to the production of a jointly owned output (i.e. single report).

Harmonized needs assessments are conducted by a single agency and provide an alternative to joint assessments in situations where there is a compelling reason to do separate assessments, due to operational considerations, protection concerns, or the need for specialist data collectors or different methodologies. Harmonized needs assessments must adhere to agreed standards in order to facilitate cross-analysis, including but not limited to geographic data standards and agreed thematic indicators.

The critical aspect of a coordinated assessment approach is ensuring the participation of key stakeholders in all steps of the process to promote common understanding of the objectives, data collection and analysis methodologies, findings, and priority issues.

Required appropriate data from relevant market stakeholders ¹⁷	
General Commodities	Adapted to Housing
<ul style="list-style-type: none"> ❖ Immediate and longer-term needs ❖ Access (physical, financial and social) to key commodities, including potential barriers pre and post-crisis 	<ul style="list-style-type: none"> ❖ Immediate and longer-term [shelter] needs ❖ Access (physical, financial, social and legal) to [shelter], including potential barriers pre and post-crisis (such holding legal documentation that might impact on security of tenure).

¹⁶ 2017, UNHCR, Needs Assessment Handbook
¹⁷ 2017, Helene Juillard commissioned by CaLP, *Minimum Standard for Market Analysis (MISMA)*

<ul style="list-style-type: none"> ❖ Prices of key commodities ❖ Quality of the key commodities ❖ Seasonal differences (in terms of access and price) ❖ Investment capacities 	<ul style="list-style-type: none"> ❖ Prices of [shelter] ❖ Quality of [shelter] ❖ Seasonal differences (in terms of access [to shelter] and in [shelter] price) ❖ Investment capacities in [shelter]
<ul style="list-style-type: none"> ❖ Coping mechanisms pre- and post-disaster (particularly what people do when traders and markets are not able to respond to their needs) ❖ Pre- and post-crisis cash transfer mechanisms (e.g. banks, mobile-money through mobile network operators) ❖ Sources of livelihood pre- and post-crisis ❖ Functioning of money transfer systems ❖ Capacity for increasing the use of such systems ❖ Proximity to key basic services such as hospitals and schools. 	

Household surveys and key informant interviews

When preparing and using questionnaires, it is essential to avoid bias towards a specific outcome.

The surveyor team should use their experience and intuition. Most respondents will provide reliable answers. However, surveyors should know when *not* to take answers at face value when these answers seem to be uninformed guesses or do not match what surveyors can corroborate through observation. At the end of each questionnaire we have added a question to be filled at the surveyor's discretion:

<i>How reliable was the respondent?</i>	<i>Not reliable or insecure</i>	<i>Reliable</i>	<i>Very reliable and knowledgeable</i>
---	---------------------------------	-----------------	--

The teams already have vast experience in collecting household information, NRC is also recognized as an agency that provides assistance to the most vulnerable. It should be clear to them (so they can communicate this to others) that the market survey is **not** an exercise to identify or select beneficiaries into the programme.

Please refer to the section on Beneficiary Selection. At this stage of Market Assessment, there are several reasons most questions focus on the characteristics of the shelter and very few questions collect family information:

- The purpose of the Shelter Market Assessment itself (as already described).
- The need to avoid creating expectations that NRC will provide services. This is relevant, especially considering that a significant proportion of HHs interviewed (half or three quarters of respondents) will belong to the *Host* community, rather than to displaced families (the main target populations for most NRC programming). Host community families only represent a minority of NRC beneficiaries, yet often live in conditions of vulnerability.
- We should not be perceived as intrusive. Requesting limited personal information is also a sign of respect, and of data protection (indicating that the data that is not collected cannot be misused).
- A golden rule in any Market Assessment is not to collect data that will not be analyzed *and* used in the project design / decision making process.

From the practical side, the questionnaire is already comprehensive, covering different shelter indicators. Adding more socio-economic data would extend the time it will take to fill in. We depend on the collaboration of every person that welcomes us and interrupts their activities to fill in the questionnaire. We should not take more than 20 minutes of their time (and shouldn't be rushed). The longer each questionnaire takes, the fewer questionnaires will be collected.

The focus described above should by no means interfere with the responsibility of each surveyor to stay alert and report protection concerns. A surveyor must mark the allocated box in the survey, communicate to the Shelter PM, Shelter or Protection Adviser, or local protection focal point (In Afghanistan from ICLA or Camp Management/UDOC teams) and complete and submit a referral for special cases – after obtaining informed consent and respecting relevant do not harm principles, especially confidentiality.

Surveyors should not be too rigid in limiting data collection to only the questions in the template uploaded in the electronic tablet. If through an interview a respondent raises new and important issue to be researched, they should be prepared with a notebook to collect and report this data accordingly (respecting key principles of sensitive data management related to informed consent and confidentiality). A Key Informant interview might be considered as a follow up.

As with most data-collecting applications, the surveyor will need to fill in the response to a question before ‘scrolling or swiping’ into the next. However, surveyors are advised that they do not necessarily need to ask every single question. The questionnaire has some “hints” where specific answers can be answered by observation or through the conversation that has already taken place over the course of using the questionnaire. For instance, if a respondent has already expressed that they have lived in the same house for several decades or, in the opposite case, if the respondent has showed a repatriation certificate, it is not necessary to ask their status as “Host Community” or “Returnee”. If several questions “do not apply” the surveyor should say so to the respondent, for example “*these questions do not apply, since they refer to the cost of rent, and you have mentioned you own the house, am I correct?*”.

Surveyors work in teams of two: one asking the questions and the other filling in the form on the tablet / taking notes. The way the team introduce themselves is key, especially in pre-crisis settings. Some people can be suspicious when we ask questions about the way markets function. To avoid any potential issues, agree to a set of talking points. This should not sound as a memorized script, but delivered in a natural manner. Field teams can introduce themselves by explaining that they are:

- Conducting a market assessment to better design humanitarian programmes;
- Not from the government;
- Independent humanitarian actors;
- Learning about the local economy;
- Concerned about the potential impacts of a future crisis on livelihoods in the area¹⁸;
- Collecting community-level information; and,
- No identifying/sensitive information will be shared unless informed consent is provided.

A simple way to express this is to say that rather than having someone making isolated decisions in Kabul or Europe about details of a project to implement, NRC knows it is important to talk to families and communities to learn about needs and opportunities. If useful or necessary to obtain access, the team can conduct the first interview at the house (not the office) of the Community Elder (or Malik). The questionnaire could be answered by the Community Elder himself or a female team could also talk to a female in the house. This could reduce speculations and ease the questions about what is NRC asking of the residents in their community.

CONFIDENTIALITY and CONSENT

The questionnaire requires filling in the GPS location and date. Most respondents are comfortable sharing their name and phone numbers. However, should a respondent request to be anonymous, initials could be used instead of a full name. The question about a phone number is set as a non-mandatory question.

From the start of the interview, the surveyor must inform the respondent that they do not have to answer any questions they are not comfortable with. Whilst this section focuses on the Market Assessment, confidentiality and consent are equally critical for any request for participation. Make sure the discussions are confidential. If necessary, respectfully and tactfully ask neighbours or other people to wait outside whilst the interview is conducted.

The full questionnaire will not be loaded into the tablet, until, the surveyor indicates the respondent has provided informed consent.

“Signing a consent form during an assessment without understanding what is written does not constitute informed consent. An individual must fully and clearly understand purpose, implications and possible consequences of participating. Language barriers, low literacy and low levels of education should be considered; the purpose of the assessment may need to be explained using different methods. Factors such as intellectual or emotional maturity, high levels of stress such as post-traumatic stress disorder (PTSD), severe intellectual disability, severe mental illness, intoxication, or sleep deprivation, may make it impossible for men or women to give informed consent.”¹⁹

¹⁸ 2016, Helene Juillard, The International Rescue Committee, *Revised PRE-CRISIS MARKET ANALYSIS (PCMA)*.

¹⁹ 2016, CARE International UK Shelter Team, *GENDER & SHELTER Good programming guidelines*

The HH questionnaire has also a self-checklist for the surveyor to confirm at the end of the survey that they have given an opportunity to the respondent to ask any questions, and if it is clear that this is a first stage of a market survey for research purposes (and that the teams are *not* conducting surveys selecting beneficiaries).

The principles above also apply when talking with Key Informants. In the Shelter Market Assessment, the NRC Shelter team conducted in Jalalabad, house owners and shelter agents / brokers were often members of the same community and are key stakeholders (in fact, local state agents or brokers and Elders / Maliks can act as gatekeepers to access housing). As much as possible, sample representatives that are linked to different levels of the housing market and consider age, gender and diversity in sampling data sources.

Ensure inclusiveness

“People’s relationships with other actors in market systems (i.e. traders, employers, buyers) are shaped by issues of power – which often have gender, class, or ethnic dimensions. We cannot assume that the roles and responsibilities of women and men, and hence their market needs, are the same”.²⁰

Speaking openly may be difficult or present a risk for some men and/or women. Where culturally appropriate, men and women should be interviewed separately. **In the Afghanistan context, this reinforces the importance of counting with teams of female surveyors, to collect data from male and female respondents.**

The household questionnaires include, among others, the following two key questions:

Do you live in an overcrowded house now? translated into Pashto as:

ایا تاسو اوس مهال په پر ازدحام کور کې اوسئ؟

Is your house a safe place to live? translated into Pashto as:

ایا ستاسو کور د ژوند کولو لپاره خوندي دی؟

These are examples of how through a questionnaire the needs of different groups (female/male; host community/refugee, returnees or IDPs) are captured and, therefore, NRC would be able to consider and address through its programming. Respondents are also asked to explain if they had trouble finding a place to rent. Answers will provide some insight into the financial and social access to market.

Not all the data to ensure inclusiveness will come from one data collection mechanism. After the first round of interviews conducted with the HH questionnaire, a few questions that were originally considered to provide further qualitative data were actually removed. We accepted that the particular Shelter Market Assessment in Jalalabad did not fully collect data for instance on *how do disabled people access critical market systems in crisis and non-crisis times*. As mentioned above, surveyors can and should add comments in the questionnaires. Adding direct questions would increase expectations from the host communities as mentioned above, and it has been observed that it is only the exceptional case where a house has any adaptation for mobility or other special needs.

It is broadly known that men most often deal with contracts (including rental contracts) and financial services. Through the implementation of the programme NRC can address these issues (e.g. facilitating trainings for female beneficiaries to learn how to use “mobile money”); working alongside with ICLA; and, continue to include a “Right to Shelter Use” certificate protecting all male and female family members – with the right to live in and use the shelter provided by the NRC programme.

One aspect that has been already identified is that among key informants most, if not all are male landlords and male shelter agents / brokers. Female staff should have the Key Informant Survey handy should they find a female landlady or agent. To explore more details regarding special needs or gender considerations (such as whether women and male have similar access to financial service providers), secondary data, key informants and focus group discussions rather than HH surveys will be more appropriate. This is especially true when we are not using the assessment to select beneficiaries.

²⁰ 2010, Oxfam, The Emergency Market Mapping and Analysis Toolkit

Analyze the data

The data collected will provide information with regard of the *quality* of shelter within the affordable housing / rental / secondary units; the *price* of such units; the availability and access to different types of shelters (houses, apartments and shelter units within compounds); the availability of basic services, infrastructure and livelihoods. As we summarize and study this data, the first rule for ensuring a quality market analysis is to avoid skewing – through our bias – conclusions towards a specific, “pre-set” outcome.

“The level of analysis is adequately defined based on the information needed, the resources available and the risk that the intended response will harm the market.”²¹ Data should also be triangulated and drawn from multiple sources. Data should be interpreted within the level of representation. Summaries and graphs should be clear: indicating if the statistics represent a specific sub-group or sample of the total information (e.g. urban and peri-urban areas). Data should be compared to both technical and humanitarian standards (e.g. Sphere) but also –equally relevant – to what is locally expected or accepted.

Use market analysis to adequately inform programme design and achieve programme objectives²²

STEPS

- Adjust the level of analysis based on the quality of the existing information, time and resources available, and the risk that the intervention will harm the market.
- Prioritise understanding the overall market environment and the impact it has on your key markets.
- Triangulate data collected using different methods and from different sources in order to identify unreliable data and inconsistencies.
- Analyse trends rather than individual data points, taking into account seasonal effects.
- When drawing conclusions, clearly state the assumptions, the type of data on which they are based, and any risks that may be linked to the assumptions.
- Clearly show the link between the analysis, conclusions and the ultimate response recommendations.

The conclusions and recommendations from the data analysis should therefore respond to questions such as those in the box below.

Assess critical market systems in pre-crisis settings information²³

- What are currently the main constraints on the market that may hamper its ability to absorb the forecast shock?
- What are some immediate and longer-term actions that might be undertaken to remedy the situation?
- What will be the most likely constraints on the market systems during the forecast crisis?
- What should be the agency's response to the forecast crisis, to prepare for the situation and mitigate negative impacts?
- How quickly could these interventions be implemented, so as to be relevant?
- What resources would be required to implement each approach?
- What are the existing structure(s) that the agency could work with (e.g. unions, guilds, associations, NGOs, local groups, lending institutions, networks, government agencies, etc.)?
- Including security and access considerations, how feasible is it in technical, social and political terms to deliver each of these support options in practice?
- How socially accepted are the different delivery modalities under consideration?
- How willing and capable are the market actors (and essential/key service providers) in responding to a potential intervention? What challenges/limitations exist (e.g. what is the traders' cash absorption capacity)?
- Can the agency do anything to reduce those limitations (this includes advocacy as well as a market support intervention)?

²¹ 2017, Helene Juillard commissioned by CaLP, *Minimum Standard for Market Analysis (MISMA)*

²² 2017, Helene Juillard, *MISMA*.

²³ 2016, Helene Juillard, The International Rescue Committee, *Revised PRE-CRISIS MARKET ANALYSIS (PCMA)*

Keep in mind that the purpose of conducting a *Shelter* Market Assessment is to inform decision-making before implementing a *Shelter* project implemented through CBI. Therefore, the analytical questions are adapted by the Shelter team and to inform *Shelter* Programme design.

Decisions and programme considerations integrate the findings from the analysis to promote quality standards as we provide shelter assistance and support local economies through increase of purchasing power – if the conditions are conducive to do so through CBI, for example Cash-for-Rent or Occupancy Free of Charge.

The following were the key questions that guided the Shelter Market Assessment conducted in Jalalabad in 2018, and informed the CBI implementation (described in the next section):

1. How does CfR meet beneficiary needs and what are the limitations of CfR?
2. Can the housing market respond to an increase in demand as a result of a CBI, in particular CfR?
3. In what way can interventions risk harming existing markets?
4. How can interventions actively support markets and market-linked livelihoods?
5. What impact would upgrade investments in existing properties have on the current rental market?
6. How would the upgrade of shelters effect the current rental market availability and price?
7. What is the optimal time period for CfR intervention?

Cash for Rent Programme Design and Implementation

“Pre-conditions need to be in place for the effective implementation of financial support in S&S [Shelter and Settlements] interventions. Markets need to be functional, accessible and the required goods or services available at reasonable and, wherever feasible, stabilized prices, safe delivery mechanisms should be in place, and social and government acceptance ensured”.²⁴

If, after conducting a Shelter Market Assessment, the local residential market (in its sub-segments of *affordable housing* / *rental units* / *secondary units*) is considered functional, the design for a CfR programme will follow the regular first steps as any other Programme Design process. This means it will be based on clear objectives, considering the relevant context (history, current events, trends and triggers).

The process will include mapping of stakeholders, building partnerships as needed, assessing the agency’s own institutional and HR capacity, assessing security and access into implementation areas, conducting a risk assessment and mitigation plan, investing in staff recruitment / development, and coordinating with other agencies (e.g. actively participating on the Shelter Cluster or Sectoral Working Groups where CfR will likely be discussed).

Additional to the basic / general setup of the operation, these guidelines further elaborate on the steps proper to CfR.

The steps are not necessarily in a fixed order as some processes happen simultaneously or might be pre-existing:

1. Identify beneficiaries
2. Identify adequate housing units
3. Determine value, frequency and length of the assistance
4. Identify cash delivery mechanisms
5. Launch a bid for services and sign a framework agreement with the chosen supplier
6. Request and organize cash distributions
7. Implement Transparency, Accountability and Internal Controls
8. Identify Protection Considerations
9. Establish systems for Monitoring, Learning and Evaluation

²⁴ 2017, DG ECHO, Humanitarian Shelter and Settlements Guidelines.

Identification of Beneficiaries

Following our mandate, the target groups included in our CfR intervention will include Internally Displaced Persons (IDPs), families affected by Natural Disasters or Conflict, and/or Refugees and Returnees. A portion of the assistance might also be allocated towards individuals from the host community in extremely vulnerable conditions.

Therefore, NRC must work in areas with high concentrations of IDPs and Refugees and Returnees: based on identification of these beneficiaries through field assessments, secondary data (e.g. IOM and UNHCR lists and reports), and through the Shelter Cluster. Further, the outputs should be proportional to the needs in the area.

There is still much more to do to develop internal referral mechanisms within NRC. To promote integration across Core Competencies, the Shelter team should communicate the selection criteria to other Departments – and – conduct assessments at catchment areas of the Community Centers and UDOC Committees, or NRC funded schools. Further, the Shelter team assesses cases referred by these other departments, since they have close contact with the community and have mechanisms in place for community-based identification of vulnerable cases.

NRC might also conduct assessments after receiving requests from local authorities, through referrals from other agencies or by “scouting” areas to identify isolated families that require assistance. It is important to note that not all referred households (names on a list) will automatically be included into the programme.

Even when identified as IDP, refugee or returnee, the level of impact as a result of displacement, conflict or following a natural disaster varies depending on, among other factors, the composition of the household (number, characteristics and abilities of different members), their proximity to the shocks, the HH preparedness and individual resilience (including coping mechanisms and social networks of support).

Vulnerability can be defined as “the characteristics determined by physical, social, economic and environmental factors or processes which increase the susceptibility of an individual, a community, assets or systems to the impacts of hazards.” (United Nation Office for Disaster Risk Reduction, 2017). It is important to note that when we refer to beneficiaries as *vulnerable*, in fact, what we are referring to is that said persons are under *vulnerable conditions* as a result of a range of economic, social, cultural, institutional, political and psychological factors – and at a particular time.²⁵

To identify families under the most vulnerable conditions, the selection criteria is adapted depending on the context. Irrespective of these variances, the criteria should be measurable, verifiable and clear. In terms of being *measurable*, for example, if we are seeking to support those *affected by displacement*, through the HH assessment, it should be noted *where* the families came from and *when* they arrived. The *verification* can be supported by documentation such as a UNHCR or IOM certificate, but also through observation. As the assessment takes place at a household visit, the team can describe the housing conditions or confirm, for example, if the head of the household has a disability.

Since we operate with limited resources and decreasing funding, we depend on experienced staff to identify the complexity derived from multiple vulnerability factors and additional hardship. Some of these factors are found at the community level such as access to other humanitarian assistance, level of isolation of a village and level of family-based and social ties among/between communities.

Considering that a CfR programme is a shelter response, homeless families, families living in substandard housing, staying in overcrowded accommodation and/or at risk of eviction are prioritized in order to reduce heightening protection risks and exacerbating conditions that will require additional assistance (e.g. aggravating existing health problems due to improper sanitation or exposure to the elements).

²⁵ Protection-sensitive vulnerability assessments take into consideration the overall Risk level of the assessed HH, that can be represented by the risk equation: $R=V*T/C$. *Vulnerability* (V) is directly linked to the condition of the assessed individual/HH and it is the result of a mix of socio-cultural, economic, political factors as well as personal characteristics (special needs), especially medical conditions, disabilities, age, lack of family support, etc. *Threats* (T) are external factors linked to possible perpetrators exposing the assessed individual/HH to additional danger (e.g. intra-familial violence; or local figures of power extorting money from specific individuals, such as female head of HHs); and *Capacities* (C) are related to personal, family, socio-cultural resources people can rely on, such as presence of family/community support, level of education or access to livelihoods, which normally contributes to enhanced resilience at individual and HH levels – A protection-sensitive risk analysis takes into consideration not only vulnerabilities, but also threats, capacities and resilience.

It is important to keep in mind that **one indicator alone is insufficient to evaluate the vulnerability conditions of a household**. For instance, during the assessment, a respondent might report they are able to pay rent – but this, only *in an overcrowded unit or under extreme poor conditions* – and therefore they should *not* be disqualified from getting assistance. On the other hand, a *Female Headed Household* (FHHs) should *not* be *automatically* included in the programme when the HH includes adult children or children living with relatives providing support in the same compound.

NRC Afghanistan uses a *Shelter Beneficiaries Selection Scorecard*. Properly implemented and analyzed, this template is useful because it collects relevant household composition, living conditions, special needs, social and economic characteristics, as well as an indication of the household's capacity to pay rent.

The team should also be trained to identify gender-related risks. However, they must be very sensitive and cautious in asking questions that could potentially harm or ostracize respondents. In the case where a member of the team learns through any household visit of a case of human trafficking, survival sex, child abuse or domestic violence or other protection issues (e.g. child labor, unaccompanied girls and boys, adolescents at risk of recruitment, or associations with armed groups due to socio-economic hardship or family situation), the surveyor has the responsibility to confidentially and immediately report to the Programme Manager or the Protection Department.

Identification of Adequate Housing Units

In the *Cash Transfer Programming in Humanitarian Aid 2018* report the critical concern for achieving quality outcomes in Shelter is “*the need to build safe, durable shelters, through ensuring access to suitable materials, complemented as required with awareness raising, community engagement, technical support, and/or facilitation to overcome regulatory issues.*”²⁶

While CfR programmes rely on the available housing stock and do not *directly* build or pay for the construction of new units,²⁷ CfR can be considered both an Emergency *Shelter* Response, or a Transitional *Shelter* Response and the need to access **adequate housing** remains a critical component of the programme.

As a Shelter *Emergency* Response, if CfR is provided at the outset of a crisis (natural disaster or displacement), the imperative of protecting saving lives is prioritized. As soon as CfR is extended as a *Transitional* Shelter Response, the rented unit should have the following minimum characteristics: protection from damp, rain, wind and extreme weather; free of structural hazards and disease vectors; with access to drinking water, adequate sanitation, energy for cooking, heating and lighting; have proper refuse disposal; and means of storage, privacy and personal safety. Further, the housing should include security of tenure and must allow access to employment options, health-care services, schools, and other social facilities, and should not be built on polluted sites nor in immediate proximity to pollution sources.²⁸

To evaluate the *shelter conditions* or *adequacy of the shelter unit* some basic questions will include distance and access to transportation means, clinics and education facilities; and whether the beneficiaries have access to clean water and sanitation. Other questions will include: how many persons share the same room for sleeping? Is there adequate privacy in bedrooms and bathrooms (toilets and showers)? is the space accessible for members with reduced mobility? What is the overall structural condition of the building? What is the state of the roof? Is the roof structurally sound, free of leaks and does it protect from the elements? This last question is very important. Whilst an overview of the shelter conditions is needed, the characteristics and condition of the roof is often the most useful indicator of the overall state of the shelter.

The CfR project should have the flexibility to provide additional support for **People with Disabilities (PwD)** which might represent a fraction of the caseload. An additional request might be presented to the Project Manager to cover the cost to adapt the shelter for people with limited eyesight (e.g. painting a white strip across the walls for visibility). To the full extent this is possible, people who use a wheelchair or have limited mobility (e.g. due to advanced age) should be allocated shelters with obstacle-free access, including a smooth ramp on the ground floor and with sufficient turning space in the toilet and kitchen. Refer to the Guide to Age & Disability in NRC Shelter Afghanistan for specific Shelter Standards and Considerations (e.g. dimensions for internal and external shelter adaptations) as well as Critical Points of Guidance for Shelter Teams. Toilet chairs may be distributed to those who need these (following a procurement process or stock release process). Beneficiaries with special needs may also be referred to a specialist agency for further support.

²⁶ The State of World's Cash Report Cash Transfer Programming in Humanitarian Aid. CaLP, 2018.

²⁷ CfR programmes do not directly contribute with new units. However, scaling up, CfR *might* stimulate housing construction.

²⁸ Based on the OHCHR, UN HABITAT, *Elements of the right to adequate housing*.

In 2018, NRC Lebanon has been working with the Shelter Working Group to develop a tool to identify and evaluate substandard buildings. Each team can develop or adapt a Rapid Property Assessment form. If the team identifies serious risks for a family living in a space not meant for human accommodation or in a property damaged by fire, partially destroyed, or otherwise structurally weak, exposing the occupants to health and safety risks, the team should advise the family and if possible accompany them to find an alternative affordable and secure shelter.

The Right to Housing includes the right to *access* and *maintain* adequate shelter. Regardless of the type of tenure, all persons should have a degree of security that guarantees legal protection against forced eviction, harassment and other threats.²⁹ **At the assessment stage, beneficiaries will be asked about the rental agreement they might have and if they have any concerns about risk of eviction.** If the family does *not* have any contract and/or is not satisfied with their agreement, the case should be directed to ICLA to support the household in this regard. Beside strictly legal considerations, broader social issues should also be part of the assessments, especially related to possible social tensions based on ethno-sectarian discriminations, association with parties to the conflict, or other aspects which might be factors leading to forced evictions.

Relocation might be advised if the shelter is considered *inadequate* as described above. Otherwise most beneficiaries from a CfR project will have already found their own rental units, and most will be already living in them at the time of receiving CfR assistance. It is expected that most families will remain in the same shelter through and after the project cycle. The follow-up visits are intended to assist the families, not “police” them. Through PDM, NRC should learn about the reasons that cause a household to move out of their shelter in order to inform further programming.

Evaluations of Shelter CBI in Lebanon have shown that the main reasons for families to move out include lack of privacy, lack of access to services and the worry the family will not be able to pay rent after the programme ends. Disputes with homeowners and other households accounted for a small percentage of move outs. To mitigate the risk of move-outs, the team must ensure that the programme targets affordable units that meet the guidelines described above and that are close to essential services. The ICLA team can assist in conflict resolution with property owners / agents as needed.

The dynamics in a local shelter market will vary. The Shelter Market Survey will provide some insights on the areas where people can find rental units and how families rate their shelter. As the team becomes familiar with the community, it might be able to advise new arrivals even though rental properties are in high demand in a context of high displacement and mobility. In Eastern Afghanistan Rental Agents (brokers) are found in most villages and districts. Their input is also included in the Shelter Market Assessment as described in a section above.

Sphere standards need to be reviewed alongside what is considered the norm and social acceptable in terms of living arrangements. The concept of overcrowding differs among cultures. Although we must pay attention to the real risk of gender-based violence that comes with overcrowding, very little affordable housing (if any) in Afghanistan is likely to meet Sphere standards in terms of area at 3.5m² per person. UN-Habitat defines overcrowding as three persons or more persons per room. In Afghanistan, according to the Afghanistan living conditions survey (ALCS) 2013-2014, the average number of persons per room was around three, with similar occupancy rates in urban and rural areas. Indicating that overall, 43% of the Afghan population lives in overcrowded housing conditions³⁰.

We need to consider simultaneously, Sphere standards, National Standards and Do no Harm principles. The Shelter Cluster in Ukraine set the occupancy ratio for CfR at 1 room for 1, 2 persons; 2 rooms for 3, 4 persons; and, 3 rooms for 5 to 6 persons. In terms of area per person this would be closer to the Sphere standards, yet would not be feasible at all given the housing stock, common living arrangements in Afghanistan and an average size of 7.4 persons per household (UN-HABITAT, MUDH, 2017). If the occupancy ratio followed this standards, families receiving short-term CfR support would need to be most likely relocated from their current accommodation and will not be able to afford the rent after the CfR supports ebbs.

Supporting rent of what would be considered “oversized” homes for beneficiaries, would likely create tensions with the host communities. CBIs are based to provide support for families to attain the minimum or above the Poverty Line living standard and average income from a household depending on unskilled labour in the country. Significantly increasing these standards will increase tensions and create pulling factors. Any case with particular protection concerns should be flagged for special considerations to uphold dignity and reduce risks, including Gender-Based Violence (GBV).

²⁹ OHCHR, UN-Habitat, *The Right to Adequate Housing*.

³⁰ UN-Habitat, MUDH, 2017, *Afghanistan Housing Profile*.

Value, frequency and length of the assistance

Three key principles to consider when setting the value of the assistance are Relevance, Acceptance and Harmonization³¹. Relevance in terms of CfR is directly linked to the average cost of housing (average rent) in a given community or region. Acceptance includes the caution and mitigation measures to avoid disrupting the market and exacerbating tensions within the community. Harmonization is achieved through coordination with other agencies providing cash assistance in the same area to set acceptable ranges based on evidence.

If the CfR is implemented as a short term (e.g. 3-month) *Emergency Shelter Response* on its own or included in the Survival Minimum Expenditure Basket (SMEB) as a Multi-Purpose Cash Transfer (MPCT), a fixed rate will be set. Variances can be set between communities if the estimated average of rent significantly varies or when offering two tiers of assistance packages: “full SMEB” (for extremely vulnerable HHs) or “half SMEB” (for moderately vulnerable HHs). When CfR is included in the SMEB or MPCT assistance package, CfR implementation must be coordinated with the relevant working group (e.g. Cash and Voucher Working Group) establishing the guidelines of a given Emergency Response Mechanism.

A variable rate *might be considered* during recovery programming, considering CfR as a *Transitional Shelter Response*. The Shelter Market Assessment and monitoring of housing costs will provide the average rent per 1-, 2-, and 3-bedroom units. If there are significant variances between the size of the shelters / number of bedrooms, it is then necessary to decide *if* the programme should provide a fixed or variable transfer amount.

The transfer amount *could* be adapted for shelter size in relation to the household size. This is, there *could* be three brackets of cash assistance for households of, for example, 1 to 3, 4 to 7, and 8 or more members. Baseline data can indicate the variance between these tiers among the target population, and the variance between rent costs. With this information, the Project Manager and Shelter Specialist / Shelter Adviser can decide whether it is necessary and worthwhile to adjust the assistance or maintain a fixed amount. These discussions are also likely taking place at the Shelter Cluster and CBI-related Working Groups.

Before considering variable amounts, it might be worthwhile to look at how many cases it is estimated where the project will be assisting HHs of 1 to 3 members given our beneficiary selection criteria. Small HHs of 1 to 3 members are the exception and we would likely be responding to very specific protection concerns (e.g. an elderly couple living away from relatives or a FHHH moving away from domestic violence). On the other hand, a household with more than eight members, might include two families, so, providing CfR support to each family to have their private space might be also considered.

Can it ever be “too much money”? The answer is Yes. Much discussion focuses on the fear a CfR project might destabilize the market. The main risk of doing so is to overestimate the transfer amount (providing rent assistance significantly higher than the average cost in the local community), especially if paying this directly to the landlord/owner or agent. This practice is now rare after the lessons learned from different country programmes.

Considering the high mobility of families affected by conflict or natural disasters, providing CfR that is higher than the local and regional average can become a “pulling factor” further increasing the pressure on the local rental market and further destabilizing the communities. With an over-estimated amount, NRC would also miss the opportunity to assist more families. Rent increases will also affect beneficiaries themselves after the CfR period is over. Furthermore, providing CfR above the average shelter expense for local families can create or escalate tensions and resentment between beneficiaries and the host community as well as it can expose local families to risks of eviction.

Whilst more analysis based on evidence is still required, the *length* of the CfR assistance – if paying average rent cost – might not be considered a threat with a significant impact on the local shelter market. This follows global shelter market dynamics. The *supply* of housing is *inelastic* (it takes time to build a house, all the more where resources and investment or financing is scarce). Housing prices are *elastic*, mostly determined by *demand* factors – demand is quickly affected by the mere numbers or influx of displaced families (as well as the global phenomenon of urbanization) **independently to whether these displaced families pay rent with the support of a humanitarian agency, by other means, fall into debt, or relaying in negative coping mechanisms.**

³¹ Cash Transfer Programming for emergency and early recovery shelter, UK Shelter Forum, CaLP, ECHO, Oxfam and IFRC.

When the numbers begin to rise dramatically, and when new arrivals deplete their savings, pressure increases on the rental market, particularly for the most affordable units. Evictions might occur more frequently. Keeping these aspects in mind, the payments' duration and frequency will be determined primarily by the objectives of the project based on the needs identified during the assessment phase.

CfR can provide some stability for a displaced family to settle down and find an income generating activity or until the case is referred to a formal or informal social services or safety net system. In Afghanistan, other safety nets are also short term and there is no public programme that could be considered as an "exit" strategy.

Lessons learned from the Syrian Response in Jordan

"The amount and duration of cash-for-rent assistance will vary between agencies based on budgets, however it is recommended that agencies guarantee no less than 3 months of rental support. An agreement of less than 3 months has little impact and does not provide enough time for refugees to accumulate savings for future rental payments once the cash-for-rent assistance has ended. This timeframe can then be extended dependent on budget and individual cases. It is recommended that assistance is not provided for longer than 8-10 months as prolonged assistance may start to impact local rental costs in the host community. In general a monthly sum of between 100-200JD is an adequate cash-for-rent installment dependent on household and property size and average rental costs in the area".³²

Dependency is unfortunately a concern from any type of assistance. In Afghanistan, National NGOs are working on establishing microbusiness cooperatives. Internal or external referrals to livelihoods initiatives are also explored within NRC and other INGOs. Still, only a fraction of CfR beneficiaries will be able to benefit from such programmes. As mentioned earlier, a 3-month CfR assistance will continue to be considered if responding at the outset of the displacement as an *Emergency Shelter Response*. In order to make a significant impact, longer-term assistance will likely be needed.

While a concrete answer regarding standardizing the length of the assistance remains unresolved, we do have four aspects to put together and consider collectively:

- Our NRC Policy, "Shelter is essential for the physical protection and privacy of people affected by displacement, allowing them to lead lives in a safe, supportive and culturally appropriate setting";
- The purpose of CBIs, which are mechanisms by which a humanitarian agency transfers resources to people to meet basic needs and/or protect, **establish or reestablish livelihoods**;
- What we can learn from international experience: a 3-month CfR can be life-saving if provided at the onset of displacement, but it is not enough to make a difference or have a significant impact for households living under the most vulnerable conditions;
- The specific current context in Afghanistan, where there are very few if any social services or social nets that can be considered as exit strategies, and particularly returnees have a serious deficit in social networks to that can support self-recovery.

For these reasons, **CfR can be justified for up to 12 months.**

Considering that it is common to pay three months of rent in advance, and to simplify the delivery of the cash, beneficiaries can receive/collect the equivalent of three-months of rent at once, in one installment. This will simplify the process for beneficiaries and also for internal operations. *If* there are some concerns regarding security or cash flows, then the assistance could be delivered in two, or even three installments (although this is not recommended as a default option).

Following the guidelines described in this handbook, approaching the third month covered by the CfR program, beneficiaries can be reassessed case by case. An extension of 100%, 75% or 50% of the estimated average rent can then be reconsidered for a second, third and fourth quarter of a year. If the programme allows for an extension, the assistance can be delivered every three months. NRC might also consider the possibility to provide additional complementary support (in kind or also through CBI) to improve living conditions and cover other basic needs as possible outcome of the mentioned reassessment.

³² Jordan Shelter Working Group, 2015, Technical Guidelines: Conditional Cash for Rent

Cash Delivery mechanisms

At the stage of project design, the delivery mechanism is determined to ensure that the most appropriate, efficient and safest cash disbursement is used.³³

Selecting the cash delivery mechanism is based on the following guiding principles: Minimizing fraud and corruption (internal and external); Minimizing the burden incurred by beneficiaries in order to receive the cash (e.g. travel time and cost); Integrating protection-related considerations – especially risk of diversion of aid and/or illegal ‘taxation’ by armed actors; security threats on the way to and from the distribution sites; security and access considerations for NRC staff; mitigating risk of doing harm at household level (for example causing/fueling antisocial behaviours at HH level, such as drug addiction); and, ensuring that cash distribution does not delay programme objectives and activities (e.g. ensuring that cash is disbursed as fast as possible).

The four types of cash delivery mechanisms currently available for humanitarian and development partners in Afghanistan are:

1. Cash-in-envelope: Also called *direct cash*. Cash is withdrawn from the bank or *hawala* by NRC staff, and is then transported to the distribution site and distributed to beneficiaries by NRC staff).
2. Hawala: This is a traditional system that has existed since the 8th century and in Afghanistan continues as a popular and informal money transfer system based on a network of money brokers / agents. The hawala agent (hawaladar) transports cash to the distribution site and hands the cash to the beneficiaries directly (the cash amount is then checked by an NRC staff member).
3. Mobile money: beneficiaries get a mobile money account with mobile company, and receive (or register) a SIM card linked to that account. Beneficiaries receive a SMS (text message) on the SIM card number telling them where and when to collect each cash installment. Then, beneficiaries go to the mobile money agent/ kiosk to collect their cash, showing their ID and the unique account code shown on the SMS.
4. Bank transfer: Also called cash over the counter. Beneficiaries with already a bank account or after they open a bank account, get a call from NRC or the bank once their cash is ready to be collected. They can then go to the bank during the bank’s hours of operation to collect their cash.

Cash-in-envelope is no longer allowed for any NRC project – including Emergency Response – save for exceptional circumstances where no other options are available (e.g. hard to reach areas where hawaladars are not willing to operate); or when the amount of money is too low to warrant the use of hawala or mobile money (e.g. cash is given to less than ten HHs in the same location). In these exceptional cases, an approval in writing by the Head of Programme is required. CfR is unlikely to be among these exceptional cases.

All **Emergency Cash Programmes** (under the Emergency Response Mechanism or other emergency programmes) shall be done through hawala distribution. Emergency projects are defined as short-term projects (which could include *Emergency Shelter Response*), with only one or two cash disbursements per household, in which the priority is speed of distribution in which the beneficiaries receive assistance within 1-2 weeks from their identification.

All other CfR projects, should be done through mobile money or bank transfer since the beneficiaries will be selected and a list be known at least one week before the first distribution and where there will be potentially more than two disbursements per household (e.g. if the support for the HH is extended as described above for 6, 9 or 12 months).

With the current coverage of mobile money in Afghanistan (and across the world), most likely it will be possible to **use this preferred modality of mobile money for all shelter projects (shelter construction or CfR)** for as long these are implemented in urban/ peri-urban areas in relatively safe districts (which will likely be the place as we aim to integrate with the programming of other Core Competencies, particularly the UDOC projects at Community Centers).

Different mobile network operators (MNOs) have different coverage, depending on the region (in terms of both agent coverage and cell phone network coverage). In Afghanistan Roshan is stronger in the east, AWCC is stronger in the south. Logistics at the Area Office level can assess and confirm as needed. **It is expected therefore that future CfR programmes will be implemented using mobile money in partnership with an MNO.**

³³ Section prepared with material produced by Anna Law, Cash Adviser/ Livelihoods & Food Security Specialist, NRC Afghanistan

The following questions will assist the Support Department to select a mobile network operator / MNO:

- Does the MNO have enough agents in the area of coverage?
- MNOs often exaggerate their field presence. Ask for specific number of agents/ distribution points in the city/ district.
- Does the MNO frequently have cash flow issues?
- MNOs typically withdraw cash from a local bank branch on the day of/ shortly before the distribution date. Because banks are increasingly reducing the amount of cash they hold on their premises for security reasons, MNOs are sometimes unable to withdraw the necessary amount of cash. This means that beneficiaries show up at the distribution but the agent tells them to come back a few days later because there is no cash available.
- What type of ID does the beneficiary need to have? Will WFP SCOPE, IOM and UNHCR cards be considered?
- What is the maximum amount of cash the MNO is able to distribute in one day?
- Does the MNO have the capacity to train beneficiaries in mobile transfer process?
- Especially considering high beneficiary illiteracy rates (use of SIM card, how they will be notified of date and location of distribution etc.).
- Is the MNO willing to do trainings in communities or would beneficiaries have to come to MNO premises?
- Does the MNO have female trainers? How many people can be trained at once?
- What is the MNO technical support and complaint mechanism?
- Ask what happens if a beneficiary has technical issues with or loses the SIM.
- Is there a hotline, or would beneficiaries have to report the issue to the implementing organization?
- Can the MNO provide a detailed breakdown of MNO fees?
- This should include the account set-up fee for the organization, the beneficiary one-time set-up fees (including SIM card), commission fees per transfer (confirm if it is a flat rate or a percentage of the transfer), and if there are administration or other fees to consider.
- Does the MNO have previous experience with development/ humanitarian cash programmes in the project area?

Considering that the MNO receives distribution requests with the list containing identifying information, the MNO bid analysis and framework agreement includes NRC stand against corrupt practices as well as the supplier's ethical standards declaration to mitigate against diversion of aid, discrimination, and other harmful practices exposing beneficiaries to protection risks. Beneficiaries must also be informed of what identifying information is shared with MNOs.

In the contract with the MNO, there must be a clause specifying that the withdrawal fee will be charged to NRC as the implementing organization, and not to the beneficiary. If this clause is not included, the MNO will normally assume that the fee should be charged to the beneficiary. The contract should include a description of the MNO technical support and complaint mechanism and a detailed MNO fee breakdown. It is also important to specify what type of beneficiary training the MNO will provide (how many training sessions, and what will be the content of sessions).

A flowchart or list of cash disbursement process is also part of the contract. This illustrates key steps and responsibilities: 1) NRC sends beneficiary list to MNO; 2) MNO creates mobile money account for each beneficiary; 3) MNO distributes SIM and trains beneficiaries; 4) NRC sends cash distribution request with beneficiary list plus the amount per beneficiary to MNO; 5) NRC credits cash amount to MNO bank account; 5) MNO transfers cash to beneficiary accounts and sends notification SMS to beneficiaries; 6) Beneficiaries withdraw cash from MNO agent/ distribution point; 7) MNO sends proof of transfer along with a disbursement report and invoice to NRC.

As of June 2018, NRC Afghanistan has a country-wide framework agreement for mobile money with AWCC/ ABMCC for (MyMoney service) and framework agreement for the East region with Roshan (mPaisa service). These contracts are flexible as they don't specify the number of beneficiaries or a specific project, but they do specify the geographic area covered. NRC will be re-tendering for its mobile money services in July 2018 – which could potentially increase the number of framework contracts with different MNOs – either for country wide coverage or for area-specific coverage.

A Framework Agreement fixes the rates for a specified duration (currently one year from the effective date, which can be renewed upon mutual agreement up to a maximum of three years). The framework agreement is signed by the Head of Programme or Country Director, depending on the projected cumulative value of the contract. Having this in place is of great assistance for a prompt response. However, the framework agreement is explicit on the point that the contract is not a guarantee of purchase (NRC has no obligation to issue a purchase order) and NRC is not way bound or compelled to solely use the services of only one MNO, but might solicit services from other suppliers for the same goods or services.

The contracts are signed at the Kabul Support Office level. To ensure a smooth disbursement at the field level, a member of the Programme, Logistics or Finance team can meet with the agent (e.g. at the collection point) to explain the cash distribution procedures (particularly the first time a distribution takes place). It should be clear who is allowed to collect the money (beneficiary and registered alternate), and that beneficiaries are allowed to collect their cash at their convenience but over a determined period of time (ideally within one week and no longer than 3 weeks).

In order to issue an order for a distribution to the mobile money providers, a member of the programme staff (usually the Project Manager), should both, call and send an email the MNO to inform them of the next distribution date/ beneficiary numbers and amount to be transferred. The phone-call is an efficient mechanism to reach and mobilize the MNO and the email – will document the payment request for the next transactions and should have Logistics in copy

Setting a time range for distribution will help beneficiaries. No distributions should be planned to take place around public holidays. Even if the MNO agents are working, banks might not be open, which will cause delays in MNOs accessing cash. It is also necessary as all documents showing that the money has been transferred to the beneficiaries must be submitted by the mobile company to Kabul Finance within 1 month of the transfer.

During the distribution, beneficiaries must bring their Tazkira (National ID) in order to receive the cash. The agent is responsible for checking the ID against the beneficiary list provided to the agent by NRC. Beneficiaries must sign or fingerprint the distribution list when they receive the cash, and the mobile company must submit this list to NRC as proof that the money has been received. The distribution list must show the name and ID number of the beneficiary (or name and ID number of alternate – information that must be pre-registered into the project), date of cash collection, location (mobile agent reference), amount received, and signature or fingerprint.

In addition to the signed / fingerprinted distribution list, the mobile company must submit the electronic record showing that the money has been deposited into beneficiaries' account. Both of these documents must be sent to Kabul Finance/ Logistics within one month of the transfer into beneficiaries' accounts.

The Shelter staff is responsible for clearly telling beneficiaries how much they will get right before each distribution. This is critical especially if different HHs will receive different amounts (e.g. if the project has different tiers per size of HH or vulnerability as discussed in the previous section), or if the amount varies between each installment (e.g. for the second or third quarter if the assistance may be reduced to 75% or 50% of the estimated cost of rent as an exit strategy).

The Shelter staff must inform beneficiaries that the mobile agent should *not* be taking a withdrawal fee: The amount that beneficiaries receive should be exactly what is written on the distribution list. If the mobile agent claims that he should be charging a withdrawal fee, the beneficiary should inform NRC immediately.

The team will also ask each beneficiary for an *Alternate* (a close person who has a tazkira ID) who will be the only person allowed to collect the cash instead of the beneficiary him- or herself. The name and tazkira number of the alternate must also be included in the distribution list provided to the Mobile agent.

NRC is currently exploring and advocating for alternatives. At the moment, the condition of having a tazkira or a close person who has a tazkira (as required by local authorities and MNOs), might expose some FHHs without tazkiras to extortion and/or SEA risks. If a FHHs reports not having either a tazkira or a close person that could accompany her, the specific case should be discussed to consider a different distribution modality.

Whilst using MNO / mobile money is considered efficient in Afghanistan, and a global trend, we can still explore the opportunities to assist beneficiaries in opening bank accounts. Inclusion in formal financial institutions is considered a key enable of the Sustainable Development Goals (SDGs) and will be an additional and longer-term benefit from the CfR.

The Shelter Team should provide written feedback to Logistics (using the Evaluation of Supplier Template annexed to the Logistics Handbook) regarding the performance of the mobile agent provider at the distribution points. They will be asked to report any issues, including frequency of complaints or complications, and the response by the agent when any issue was raised. This is extremely useful, particularly when a renewal of a framework agreement is due.

Transparency, Accountability and Internal Controls³⁴

Organizations that lack internal controls are clearly more susceptible to corruption and experience larger financial losses compared with organizations that have internal controls. Systems must be in place and cover from the assessment stage to the PDM.

Assessments already offer opportunities for corruption as field staff may be exposed to pressure, coercion or bribery from local community “leaders” or other powerful stakeholders. These tactics may be used to try and influence the assessment staff in favour (or against) a specific area, certain target groups or group of families according to political, religious, ethnic or other affiliations.

During assessment, target group numbers and the level of the needs can intentionally be drastically inflated. To reduce the risk, the team should be able to assess local power structures (becoming aware of the level of influence and corruption); select a mixed assessment team with local and external members; consult communities, including women and minorities; coordinate with other agencies and share results with donors to avoid double-funding; check data between multiple sources; and compare planned projects with open data from governments, NGOs, researches and donors.

All NRC staff must be on the alert for unscrupulous contractors / workers who might demand or suggest additional compensation from beneficiaries, including food, money or sexual favours. Staff should also encourage beneficiaries to report any problems they might face.

Mitigation measures start at the level of project design: carefully setting of the targeting of beneficiaries, strictly following protocols for assessment tools, and conducting quality work while collecting information.

Once beneficiaries are selected, it is commonly known that handling finances also offers myriad opportunities for fraudulent practices.

Worldwide, construction is considered among the industries that are most vulnerable to corruption. This vulnerability is emphasized when managing construction programmes through cash grants rather than controlling the procurement and building activities. Cash-for-Shelter is then doubly vulnerable if NRC’s internal control procedures are not properly followed.

A basic mitigation mechanism consists of establishing trust-based relationships with staff and contractors (for example MNOs). Maintaining strong relationships can reduce the exposure for theft, bribes or other forms of corruption. Household visits are relevant since CfR has the specific purpose of providing Adequate Shelter. Monitoring visits can also help develop and maintain trust, as well as identify possible problems.

Compared with the services provided by hawalas or distributing direct cash in envelopes, the use of mobile money has more reliable accountability systems in place. The technology used in mobile money requires confirmation from each SIM card that is electronically collected. This can reduce the risk of threats, bribery and corruption.

Even with this modality in place, the Programme and Support team should still *watch out for*: Unjustified requests for cash payments; Lists that might be suspicious due to duplication or falsification; Fake beneficiary identities or registration cards; Discrepancies between cash entitlements in the beneficiary selection, disbursement and PDM; or, Project results manipulated within monitoring and donor reports.

Compliance with NRC’s procedures, including clear and well-known segregation of duties between finance and logistics, frequent spot checks and regular risk mappings, form the basis of NRC’s corruption prevention. For CfR, this would imply that neither the person responsible for submitting the list of beneficiaries nor the person who receives the reports from the financial institution that provides the cash distribution services (e.g. MNO) should not be the same person who prepares the contract (to avoid becoming the requester and receiver). Ideally, the persons that will receive and review the reports will rotate. When a member of the Shelter team makes a request for a cash distribution for CfR, a colleague (if possible from another department) should be able to review the request against the list of beneficiaries.

³⁴ Section based on the 2015 NRC Anti-corruption handbook (among other sources as noted). For full details and further information refer to the original document available through HR and Senior Management at NRC Afghanistan Office.

NRC's procedures also exist to protect staff from false suspicion of corrupt behaviour and from extortions from others to commit corrupt acts.³⁵ Intentionally false accusations and reports are seen as a breach of the Code of Conduct and will be subject to disciplinary action.

While the majority of our NRC staff and partners act in a manner consistent with the principles in the Code of Conduct, it is important to be aware that some may be tempted to initiate corrupt acts, or be bribed or threatened. Every NCR employee who has signed a contract with NRC has the duty to report misconduct committed by NRC personnel or any other humanitarian worker, partner and/or third parties doing business with NRC. Managers and staff in senior positions have additional responsibility to inform of any wrongdoing. Managers who lead by example and always act and react upon misconduct, are key success factors. NRC has in place "whistle blowing" channels at the national and international Levels. For detailed procedures refer to the 2015 NRC Anti-corruption handbook or The Whistle Blowing Mechanism in NRC that outlines four channels for reporting:

1. Through line manager or any senior manager
2. Through appointed focal points or staff representatives
3. Through the HR Manager (Country Office/Regional Office) or the HR Adviser (Regional/Head Office)
4. Through the following e-mail: whistleblowing@nrc.no

"All allegations, suspicions and accusations of inappropriate behaviour will be investigated completely, professionally and with utmost care to confidentiality and the protection of the whistle blower and survivors of abuse" (Christopher Nyamandi, Country Director, NRC Afghanistan, 2018).

Any breach of the Code of Conduct may lead to disciplinary action, dismissal and even legal action. Applicable laws and contracts of employment will be followed.

Corruption within the organisation may damage our reputation and work, and the morale of our staff. Further, corruption is one of the main obstacles for positive development in fragile and poor countries.

UN member states have committed to the Sustainable Development Goals (SDG), including SDG 16 on sustainable governance which is of relevance to the global anti-corruption agenda by targeting illicit financial flows, bribery, corruption and in appropriate access to information.

"The Islamic Republic of Afghanistan's sustainable development – and ability to achieve its Sustainable Development Goal (SDG) commitments – is continually undermined by the widespread, systemic presence of corruption in the country." Corruption remains a serious problem in Afghanistan with 84 per cent of respondents to a survey saying corruption is a major problem with concerns about corruption in daily life growing consistently over the years.³⁶

Since corruption permeates most sectors and levels of Afghan society, humanitarian programming is also vulnerable to similar liabilities. It is important to be aware that perceptions of what constitutes corruption also vary within and across cultures. What is considered corruption in some cultures (nepotism for instance) may be acceptable in others. Hence anti-corruption awareness must be constantly on the agenda within NRC, with strong context-specific prevention measures in place. NRC uses the term corruption in the wider sense and defines corruption as "the abuse of power for illegitimate individual or group benefits". This involves both financial and non-financial benefits.

With CBI, as with any other modality, donors are investing in audit trails and request that we ensure we can follow the money all the way to the beneficiaries. The team should know that CfR and the Shelter Programmes in Afghanistan, can and will be evaluated.

Misconduct and corruption is also mitigated by building the capacity of all members in the team – working together, sharing common projects. In any organization it is expected that people will have different roles and responsibilities. However, **if all the power, information or responsibilities is concentrated in one person, this is a red flag for lack of a functional control system.** In the implementation of CfR, beneficiary lists and request for payments must include different levels of authorization. Staff at the same level should also rotate regularly so they cannot develop, or be accused of, improper connections with or dependency on particular agents.

³⁵ 2015 NRC Anti-corruption handbook

³⁶ 2017, Transparency International

Humanitarian workers are often exposed to situations where they are expected to pay bribes. If one organisation pays bribes, it has implications for the other organisations working in the area, and in the longer-term, also for the local population. This advisory from NRC Anti-Corruption Handbook is intended to prepare staff and Implementing Partners on how to handle bribery situations when/if they occur.

Consider the following when/if appropriate:

When confronted by someone demanding bribes, **explain why you are not able to pay the bribe**, for example: “My head office doesn’t allow me to pay any fee that isn’t official and comes with a receipt. My organisation must act in accordance with the UN Convention against Corruption.” Appeal to the person’s superiors if payment is insisted on, if safe.

Politeness and good humour (if appropriate). Taking the time to talk for a minute or two and if possible have a joke together could be sufficient to persuade a soldier at a checkpoint for example, not to insist on a bribe. Often he is bored, and is grateful to be treated as a human being.

Be prepared to wait! Patience cures many problems, while impatience often increases the pressure to pay a bribe. If you reach an impasse at check point, and it is important for you to get through, be prepared to wait an hour or two and keep negotiating politely. Otherwise, consider turning back, and trying again another day.

In the meantime, you could (if safe) inform the higher military or police authorities of the problem that you faced, and request them to do something about it.

The patience principle also applies to bureaucratic processes, such as NGO registration with the government authorities etc. In some countries, this can take very long, leading to a temptation to try to hurry the process up.

Avoid one-on-one meetings with officials.

Remain courteous, respectful and – if possible – friendly. Some officials who normally insist on a bribe seem flattered and pleased when treated kindly, and waive the bribe as a result.

Ensure that all **your paperwork and documents are in order**, and that you have copies of them with you at all times, so that if an official challenges you, the document is there to show. This may mean always having a big folder with you – a small price to pay to avoid the hassle that you might otherwise face.

Respect the local laws. This makes it less likely to be accused of wrongdoings and hence put in the power of corrupt law enforcement officials.

Communicate NRC’s zero- tolerance policy to suppliers, contractors, beneficiaries and other third parties.

Incorporate anti-bribery clauses in all contracts.

Inter-agency coordination reduces the opportunity for corruption to penetrate an overall emergency response. Exchange of experience and **a collaborative, offensive approach** helps agencies address and prevent common internal and external corruption problems.

Never put your life or the life of others in danger due to strict adherence to NRC’s anti-bribery policy. In critical situations, consult your Line Manager or the Country Director for advice when possible and **always** inform them immediately after an incident.

Learning from International Experience, in particular from the Guidance on Monetization in the Shelter/NFI Humanitarian Response in Ukraine, the Shelter Cluster points at four key steps to prevent corruption:

1. **Careful targeting of beneficiaries and the project goals from pre-project stage** (informed by pre-project assessments)- This is linked not only with collecting all necessary information and resources for the implementation of projects but also analysis and use of the same.
2. **Transparency**-Throughout the programme implementation cycle, it is important to ensure that the implementing agency provides information to the communities (municipality authorities, host community, beneficiaries, those who provided information for assessments, etc.) about their beneficiary criteria. Moreover, implementing agencies should be clear about what their assistance aims to achieve and what it cannot achieve.
3. **Communication**- Related with transparency is the need to communicate clearly with stakeholders (primary and secondary) about the activities.

4. **Accountability**- As many cash and shelter projects have the main aim of facilitating an owner-driven approach, the project should include opportunities for beneficiaries to be involved in the project design and to provide feedback to the results and implementation of the project.³⁷

Regular Monitoring and Evaluation of NRC's programmes and support functions, especially on-site physical monitoring (by mixed teams) and unannounced spot checks, are among the most effective tools for combating corruption. Backed by regular internal and external audits, they provide systematic examination of every stage of programme implementation. Audits (when conducted beyond the "paper trail") further ensure compliance with our policies and procedures, and can detect and prevent corruption.

Note: Beneficiaries using the CfR they receive for a different purpose is *not* corruption. PDM from different countries have shown that no more than 0.5% of CBI beneficiaries might use the cash assistance in alcohol or entrapment. Whilst CfR has a specific purpose to provide adequate shelter, we acknowledge that families have a range of needs. In order to achieve the project goals, the main mitigation strategy is to adhere to the beneficiary selection criteria, including shelter living conditions as discussed in this guidelines. In sum, the use of CfR for other purposes is not corruption, but rather an indication of incorrect beneficiary assessment and selection, or that the assistance is not what some beneficiaries prioritize or need.

Further Considerations and Core Competencies integration

Camp management and UDOC (urban displacement and outside of camps) programmes

As mentioned earlier, ideally, CfR projects will be implemented in areas where NRC is implementing Camp Management or UDOC programmes, since in these areas NRC will have established trust with the community and an understanding of local dynamics. Moreover, the Community Outreach Centres, Outreach Teams, and Neighbourhood or Settlement Committees provide a valuable source of information about the area (including during market assessment phase), and can assist in identifying possible beneficiaries – in particular new arrivals – for a CfR project. Neighbourhood and Settlement Committees comprise of IDPs, returnees, and host community; who receive training and support from NRC's Camp Management Outreach Teams and are selected using participatory methodologies to ensure age, gender, and diversity in their membership – including people with specific needs and more vulnerable groups.

The Outreach Teams, Community Outreach Centres, and Committees can also be used by beneficiaries and other members of the community to communicate any concerns they may have about a CfR project, thereby enhancing accountability. It is essential that Camp Management Outreach Teams are notified about CfR projects, including selection criteria, duration of assistance, and geographical targets. This means they can also support in stemming rumours about the project, and explaining to excluded beneficiaries why they were excluded – thereby serving to improve NRC's community acceptance and hopefully prevent intra- or inter-communal tensions.

Finally, a key role of the Camp Management teams is to undertake regular service mapping and monitoring, and updated referral pathways, which means they can support in further external referrals of CfR beneficiaries. It is recommended that Camp Management Outreach staff are made aware of selected beneficiaries in the catchment areas of Community Centres, and visit these households at the beginning of the CfR period. In addition, Shelter team should notify these beneficiaries about the Community Centre in their area.

ICLA (information, counselling and legal assistance)

Cash and tenancy are two elements in Cash for Rent (CfR) interventions that connect it to ICLA P programme. Control and high security of tenure for beneficiaries, provision of information on tenancy rights, obligations of landlord and cash service providers, and legal assistance to beneficiaries should be an integral part to CfR programs to ensure transparency and accountability (beneficiaries, Cash services providers, NRC and landlords). To that end, ICLA may contribute to the CFR interventions in the following ways:

³⁷ 2016, Shelter Cluster Ukraine, *Guidance on Monetization in the Shelter/NFI Humanitarian Response in Ukraine*

Provision of information on

- Tenancy rights and landlord obligations
- Formal and informal justice systems so beneficiaries know where to approach in case any problem arises between the tenant and the landlord
- Scope of work of NRC ICLA Program
- Importance of documenting transaction
- Hotline that beneficiaries contact ICLA in case of any violation or forced/thread of forced eviction

Legal Assistance

- Develop written agreement between landlord and the tenant (CfR beneficiary)
- Develop written agreement between cash service provider
- Providing legal assistance where a dispute arises between landlord and tenant
- Assist if needed with due diligence on ownership documents of landlord
- Help beneficiaries obtain Tazkera necessary to obtain SIM / access cash through MNO or to open a bank account
- Develop standard tenancy agreement and receipt of monthly rent payment to provide a template available for use for Shelter CC

Capacity building

- Provide Housing Land Property right trainings, including tenancy rights, to local dispute resolution mechanisms (in Afghanistan working with local traditional structures such as the Shura/Jirga)
- Provide Community Dispute Resolution trainings for the Shura/Jirga
- Provide shelter HLP trainings for Shelter ICLA staff

In coordination with Shelter, ICLA can also produce fliers with information about both ICLA and Shelter services for distribution in communities; conduct joint beneficiary selection field missions in which ICLA staff can check landlord ownership documents and develop written agreements for beneficiaries.

Finally, ICLA can also include questions in Post Distribution Monitoring tools to capture data on issues related to security of tenure. This would provide lessons to whether the parties to the agreement keep their commitments or learn why not, should that be the case, and explore how could broke agreements be improved.

Protection Considerations

- Always conduct protection risk analysis at both community and HH levels before implementing CfR interventions
- Do not over-rely on community representation mechanisms (i.e. community leaders, elders, shuras, etc.) to determine beneficiary selection, cash transfer modality, cash amount, etc. Instead, ensure inclusiveness based on AGD considerations
- Provide targeted/ad hoc CfR support to address specific protection needs of particularly vulnerable individuals/HHs (especially, PWDs, EHHs, FHHs, people with critical medical conditions, etc.)
- Carefully calibrate cash amounts based on existing market analysis to avoid doing harm by distorting the market, exposing people to risks of eviction, causing/execrating inter-community and intra-community tensions
- Consider complimentary additional support (i.e. Cash Plus) to particularly vulnerable CfR beneficiaries to contribute to longer-term sustainability and/or address protection risks, especially adoption of negative coping strategies'
- Adopt a conflict-sensitive lens closely linking access, security and protection considerations to avoid exposing beneficiaries and NRC staff to security risks, especially illegal taxation, corruption, diversion of aid, sexual exploitation and abuse, etc.
- Ensure close PDM to timely identify unintended negative effects of CfR on beneficiaries, especially adoption/exacerbation of antisocial behaviors, exposure to abusive practices (especially corruption, SEA, etc.), need of additional complimentary assistance, risks of eviction, etc. Enhance accountability to affected communities
- Ensure field teams have required capacities to safely refer protection cases identified during assessments and other field visits

Bibliography and Resources

- Altaf Almadhyan, Emily Dillon, (2016), CaLP. *Market Analysis and Outcome/Impact: Measurement in Cash Transfer Programming in the WaSH and Shelter Sectors in Sudden Onset Disasters*.
<http://www.cashlearning.org/downloads/calp-lse-calp-web.pdf>
- Alexandra Spencer, Chloe Parrish, Charlotte Lattimer (2016) ODI, *Counting cash: tracking humanitarian expenditure on cash-based programming*, <https://www.odi.org/sites/odi.org.uk/files/resource-documents/11296.pdf>
- CaLP (2018) *The State of World's Cash Report Cash Transfer Programming in Humanitarian Aid*.
<https://relayto.com/calp/the-state-of-the-world-s-cash-full-report-chkz1ixy/pdf>
- CaLP (2014), *WASH and market training*,
http://www.cashlearning.org/resources/library/546-wash-and-market-training?keywords=®ion=all&country=all&year=all&organisation=all§or=all&modality=all&language=all&payment_method=all&document_type=presentation&searched=1
- CaLP (2015) *CaLP Level 2 Training - cash transfer programming (CTP)*
An Introduction to Cash Transfer Programming
<http://www.cashlearning.org/downloads/calp-lii-module-one.pdf>
When to use cash transfers?
<http://www.cashlearning.org/downloads/calp-lii-module-two.pdf>
Selecting, designing and implementing CTPs
<http://www.cashlearning.org/downloads/calp-ii-module-3.pdf>
Monitoring, contingency planning and preparedness
<http://www.cashlearning.org/downloads/calp-lii-module-four.pdf>
- CaLP (2015b) *Markets in Humanitarian response*, accessed on June 2018.
<http://www.cashlearning.org/markets/markets>
- CaLP, ECHO, ICRC, Oxfam, UK Shelter Forum (2012), *A 4 hour workshop on using Cash Transfer Programming for emergency and early recovery shelter*.
<http://www.cashlearning.org/downloads/cashshelterworkshopmoduleinteraction08mar2012.pdf>
- Carolina Cordero-Scales, Jane Kellum, Amelia Rule and Louise Harrissp, lead authors, (2016), CARE International UK Shelter Team, *Gender & Shelter: Good programming guidelines*, produced with the support of the IHG Foundation.
https://insights.careinternational.org.uk/media/k2/attachments/CARE_Gender-and-shelter-good-programming-guidelines_2016.pdf
- DG ECHO, (2017), *Humanitarian Shelter and Settlements Guidelines*, Thematic Policy Document n° 9.
http://ec.europa.eu/echo/sites/echo-site/files/doc_policy_n9_en_301117_liens_bd.pdf
- Helene Juillard, (2016), The International Rescue Committee, *Revised PRE-CRISIS MARKET ANALYSIS (PCMA)*
http://www.emma-toolkit.org/sites/default/files/bundle/PMCA_FINAL_WEB.pdf
- Helene Juillard, (2017), commissioned by CaLP, *Minimum Standard for Market Analysis (MISMA)*
<http://www.cashlearning.org/downloads/calp-misma-en-web.pdf>
- International Red Cross and Red Crescent Movement (2014), *Rapid Assessment for Markets Guidelines for an initial emergency market assessment* <https://www.icrc.org/eng/assets/files/publications/icrc-002-4199.pdf>
- Mike Abu, (2010), Oxfam, *The Emergency Market Mapping and Analysis Toolkit*.
<https://oxfamlibrary.openrepository.com/oxfam/bitstream/10546/115385/1/bk-emergency-market-mapping-toolkit-080210-en.pdf>

- OCHA (2015) *Philippines-OCHA-Cash Transfer Programming Infographic-2015*
https://reliefweb.int/sites/reliefweb.int/files/resources/phl-ocha-cash_transfer_programming_infographic-2015.pdf
- ODI - Overseas Development Institute (2018) video panel: The paradox of aid: lessons from Afghanistan
<https://www.youtube.com/watch?v=oUpQpFjHmcM> Q&A https://www.youtube.com/watch?v=PcVn_odhauo&t=63s
- UNISDR, The United Nations Office for Disaster Risk Reduction (2017), *COMPONENT OF RISK, Vulnerability*
<https://www.preventionweb.net/risk/vulnerability>
- Office of the United Nations High Commissioner for Human Rights, UN HABITAT, *The Right to Adequate Housing*
http://www.ohchr.org/Documents/Publications/FS21_rev_1_Housing_en.pdf
- Sharon Truelove (2016) Save the Children UK, International Rescue Committee, Mercy Corps, Labour Market Analysis in Humanitarian Contexts. A Practitioner's Guide.
<https://www.alnap.org/system/files/content/resource/files/main/lma-guidance-january-2016.pdf>
- Shelter Forum UK, CaLP, ECHO, Oxfam and IFRC, (2012), *Cash and Shelter: a workshop on using Cash Transfer Programming for emergency and early recovery shelter.*
<http://www.cashlearning.org/downloads/cashshelterworkshopmoduleinteraction08mar2012.pdf>
- Shelter Cluster Ukraine, (2016) *Guidance on Monetization in the Shelter/NFI Humanitarian Response in Ukraine*
https://www.sheltercluster.org/sites/default/files/docs/guidance_on_monetization_in_the_shelter-nfi_humanitarian_response_in_ukraine_draft.pdf
- Shelter Working Group Jordan, (2015), *Technical Guidelines: Conditional Cash for Rent*
https://www.sheltercluster.org/sites/default/files/docs/33_swg-technicalguidelines-conditionalcashforrent-shelterwg-march2015.pdf
- Transparency International (2017), *Policy, SDGs and Fighting Corruption for the People, A Civil Society Report on Afghanistan's Sustainable Development Goals.*
http://files.transparency.org/content/download/2225/13917/file/2018_Report_PolicySDGsandFightingCorruption_EN.pdf
- UN-Habitat, Ministry of Urban Development and Housing (2017) *Afghanistan Housing Profile*, Prepared by Michael Majale. <https://unhabitat.org/books/afghanistan-housing-profile/>
- UNHCR, CaLP, DRC, OCHA, Oxfam, Save the Children, WFP, (2015) *Operational Guidance and Toolkit for Multipurpose Cash Grants.* <http://www.cashlearning.org/downloads/mpg-toolkit-pdfs/mpg-full.pdf>
- UNHCR (2017), *Needs Assessment Handbook.*
http://needsassessment.unhcr.org/media/downloads/2017-05_NAH_BOOK_NEW.pdf
- Yves-Kim Créac'h, Emily Sloane, (2014), Global Shelter Cluster, *Evaluating cash for rent subsidies,*
http://shelterprojects.org/shelterprojects2013-2014/SP13-14_B02-CashRentSubsidies.pdf