



Scale Right:

Coordinating improved cash assistance in Greece

December 2016

Scale Right: Coordinating improved cash assistance in Greece

Lessons learned and recommendations for a coordinated approach to cash implementation in Greece

Report by Neetu Mahil

December 2016

About the Author

Neetu Mahil is a Cash Specialist with the International Rescue Committee's Economic Recovery and Development Technical Unit. She has over seven years of humanitarian experience, and recently conducted research on establishing a referral pathway mechanism for the Cash Consortium in Iraq (CCI). She has a Master's degree in Economics and Political Science from Johns Hopkins School of Advanced International Studies (SAIS).

Acknowledgements

The researcher is grateful to all those interviewed as part of this research for their time, analysis and thoughtful insights. This report of findings and recommendations aims to reflect the collective experience of staff from a number of agencies who have been implementing cash assistance at the ground level as well as more senior level staff who interface both with the government and with other organizations through working groups. Finally, the researcher would like to thank ECHO for their ongoing support and prioritization of shifting toward a coordinated approach based on lessons learned from implementation, which is the rationale for this report.

Front cover: Muhammad, 3-years old, during IRC registration at Schisto camp by Neetu Mahil

Back cover: IFRC registration at Softex camp in Northern Greece by Poul Henning Nielsen

TABLE OF CONTENTS

List of acronyms	4
Executive summary	5
Introduction and background.....	8
Objectives, scope and structure of report.....	10
Methodology.....	11
Analysis of findings.....	13
Key commonalities, variations, and lessons learned	14
a. Accessing permissions to sites.....	14
b. Managing inflow and outflow of refugees from sites.....	15
c. Beneficiary registration (Process, documentation, definitions, and data management)	16
d. Beneficiary verification.....	18
e. Distributions	19
f. Process for monthly top-ups	19
g. Assessments.....	20
h. Payment method.....	21
i. Approach to Unaccompanied Minors (UAMs).....	22
j. Comparison of Financial Service Providers (FSPs)	22
k. Value of transfers	23
l. Beneficiary feedback, complaints mechanisms, and communications.....	25
m. Monitoring including post-distribution monitoring.....	26
Beneficiary feedback – Focus Group Discussions	27
Scorecard: What is working and what is not?	34
Factors that have contributed to program success or learning.....	34
Government of Greece preferences and plans for handover.....	36
Recommendations for scaled design.....	38
Conclusions	41
References.....	42
Annex A: List of key informants interviewed	44
Annex B: Survey results	45
Annex C: Focus Group Discussion breakdown, script and questionnaire.....	49
Annex D: Detailed findings	51
Annex E: List of detailed recommendations.....	74

LIST OF ACRONYMS

ATM	Automatic Teller Machine
API	Application Program Interface
CCI	Cash Consortium of Iraq
CRS	Catholic Relief Charities
CPWG	Child Protection Working Group
CWG	Cash Working Group
DRC	Danish Refugee Council
ECHO	European Civil Protection and Humanitarian Aid Operations
ERD	Economic recovery and Development Technical Unit
EU	European Union
FGD	Focus Group Discussion
FSP	Financial Service Provider
GoG	Government of Greece
HH	Household
IFRC	International Federation of the Red Cross
INGO	International non-governmental organization
IRC	International Rescue Committee
KII	Key Informant Interview
LCC	Lebanon Cash Consortium
MEAL	Monitoring, Evaluation and Learning
MEB	Minimum Expenditure Basket
MoL	Ministry of Labor
MoMP	Ministry of Migration Policy
NFI	Non-food Item
NGO	Non-governmental Organization
ODK	Open Data Kit
PDM	Post Distribution Monitoring
PoC	Person of Concern
POS	Point of Sale
PSF	Prepaid Financial Services
RFP	Request for proposals
SCC	Somalia Cash Consortium
SP	Samaritan's Purse
WPE	Women's Protection and Empowerment
UAM	Unaccompanied Minor
UNHCR	United Nations High Commission on Refugees
USD	US Dollar

EXECUTIVE SUMMARY

Europe is still reeling from the largest refugee crisis it has experienced since World War II. During the first half of 2015 Greece saw an average of 3,000 refugees arriving daily by sea onto the island of Lesbos. While the number of new arrivals—fleeing war in Syria, conflicts in Iraq, Afghanistan and elsewhere—into Europe through Greece has ebbed significantly since the closing of the Balkan route and the Turkey-EU deal on March 20th 2016, Greece now faces new challenges in dealing with those remaining who await asylum in Greece, relocation to another European country, or face voluntary repatriation. These challenges come at a time when Greece continues to struggle economically.

Humanitarian organizations, the United Nations and donors such as ECHO, are working with the Greek Government to meet the humanitarian needs of populations halted in Greece. The Government of Greece (GoG) has appointed focal points to liaise with NGOs and the UN in order to coordinate an overall roll-out plan, and for granting of permissions to gain access to sites and deliver cash assistance.

The humanitarian operating context is novel and challenging. While the overall numbers of refugees and asylum seekers has dropped to 62,500¹ as of November 2016, they are spread across approximately 60 sites in Greece. Due to the fact that sites were established organically in response to the way the crisis unfolded and the abrupt closing of the borders, sites vary in the degree to which they have controlled entry and exit, accurate resident lists, capacity for effective site management or facilities.

NGOs are faced with determining nuanced approaches to delivering cash assistance on a site by site basis. The GoG's asylum and refugee registration processes are beset by delays and official documents do not articulate family connections, leaving it to NGOs and the UN to determine family structures which is critical since cash assistance is delivered to families and transfer values are determined by family size. Disparities across sites and with registration processes have created an operationally challenging context for NGOs, where no one organization has sufficient capacity to deliver cash assistance effectively and efficiently across the wide geographic spread of small-scale sites.

UNHCR is playing a key role in trying to coordinate implementation through a Cash Working Group, co-chaired with CRS and the Ministry of Migration Policy (MoMP). Harmonizing approaches has been difficult since organizations began delivering cash assistance at different times, have different levels of experience implementing in Greece, and the CWG lacks an enforcement mandate. While implementing agencies are still identifying the most effective and efficient ways of adapting to Greece's fluid and challenging context, there has been a rush to start and scale cash assistance and coordinate approaches. Sharing of lessons across implementing agencies and systemic learning has been slow to facilitate scaling a better response. Moreover, separate spaces are required for operational coordination and technical discussion to strengthen the scope for lesson learning.

As organizations plan to enter a new phase of scaled response, this research aims to take stock of what has been implemented thus far, document lessons learned through implementation, and consider design options for a coordinated and coherent cash approach across NGOs, including planning for eventual handover to the Greek national social welfare system.

¹ Though the official number of refugees in Greece is approximately 62,500 (daily government figures are published at: <http://www.media.gov.gr/index.php/υπηρεσιες/προσφυγικό-ζήτημα> / <http://data.unhcr.org/mediterranean/country.php?id=83>), on and off-site counts suggest the number closer to 50,000, of which there are 22k on sites in the mainland, some 15k on the islands and some 13k in apartments and urban areas. According to NGOs implementing cash programs however, the number of people in sites in the mainland and islands could be even lower at around 30,000, exclusive of those in apartment schemes.

This research documents current NGO cash implementation capacity and coverage; identifies lessons learned from existing implementation; identifies design feature recommendations for coordination, communication and harmonization between potential partners through a consortium or alliance approach; and identifies how a cash consortium or alliance might partner with UNHCR and the government.

This review focuses on the use of cash assistance for meeting basic needs (food, shelter, household items) for all beneficiary profiles, including households (HHs), single men, single women, or unaccompanied minors (UAMs).

The methodology uses for this research combined four approaches: desk research, survey, key informant interviews (KIIs) and focus group discussions (FGDs). The researcher spent a total of three weeks in Greece conducting the survey, KIIs and focus group discussions, conducting 22 KIIs and speaking with 80 focus group participants across two sites, one where cash assistance is delivered by the IRC and the other by Mercy Corps.

While an important step in capturing and documenting lessons learned, this study has limitations due to the short time and experience of the researcher in country, and the fact that lessons learned rely almost entirely on the experiences of the three NGOs implementing cash assistance, which include the IRC, Mercy Corps, and CRS/ Caritas.

KEY FINDINGS

- There remains a significant learning curve for delivering cash in Greece. Obstacles to achieving scale effectively and efficiently include NGO access to sites, lack of site outflow management, lengthy asylum registration processes and inconsistent documentation; and the time it takes to effectively customize an FSP platform for efficient payments.
- High-quality cash delivery requires substantial organizational capacity, technical expertise and experience where no single agency can deliver cash across sites.
- Harmonization is required to effectively scale to full coverage, and must be informed by lessons learned.
- There is a contradiction between the Government's desire to have NGOs provide full coverage of high-quality cash assistance quickly and simultaneously, and the pace by which the GoG's systems and procedures support this drive in a coordinated manner.
- Greece is a highly politicized operating environment which can at times have a greater impact on programmatic decisions than evidence and technical findings.
- There has been a rush to coordinate without the requisite systematic learning or governance structure to underpin technical coordination.
- Consortia (and in some cases an Alliance model) have been shown to foster greater horizontal accountability, MEAL, and mechanisms for advocacy, fundraising and planning through a common voice, yielding significant gains in research, learning, negotiations with providers, government, etc.
- Cash consortia in Somalia, Iraq, and Lebanon demonstrate the value of harmonizing key aspects of delivery while leveraging the diverse technical strengths of organizations.
- Beneficiaries are generally very grateful to the Government and people of Greece and NGOs for the assistance they receive. Their feedback on cash programming is constructive and they should be consulted regularly to improve the design of cash assistance in Greece.

KEY RECOMMENDATIONS

- There is a strong rationale for harmonizing cash implementation through a coherent approach to scale effectively and efficiently, as an uncoordinated approach is inefficient for NGOs and detrimental for beneficiaries.
- Consider establishing a cash consortium or alliance of implementing agencies, and create a structure for successful harmonization with a governance structure fit for purpose.
- Prioritize technical decision-making based on evidence and program learning, and adopt a minimum standards approach.
- Eliminate unnecessary duplication of roles, and determine centralized roles based on strengths and capacities.
- Centralize and consolidate government interface and advocacy.
- Centralize and consolidate MEAL & data management.
- Do not rush toward one FSP, but use competition to determine the best FSP solution for scaling efficiently and effectively in the Greek context with a more nuanced bid criteria and specifically adapted technical requirements and specifications.
- Finally, since Greece remains a fluid context, it is recommended that as organizations start or scale-up cash assistance, lessons learned are systematically captured on a regular basis, shared and used to collectively improve program delivery.

LOOKING FORWARD

As the number of beneficiaries in Greece continues to ebb due to fewer new arrivals and more families are relocated or re-united with family members outside of Greece, it is expected that funding for humanitarian assistance in Greece will likely decrease over the next 18 months. While for many of those who are granted asylum and the right to work in Greece, no future cash assistance will be needed. There may be a need to continue to provide cash assistance to those who are unable to achieve self-sufficiency through the right to work due to vulnerabilities such as disability, age, single headed-households, etc. It is currently planned that those who remain vulnerable will be absorbed into the Greek social safety net system, which already provides vulnerable or unemployed Greeks with cash assistance. It is therefore imperative for NGOs currently providing cash assistance to plan for the eventual handover of their cash programs to the appropriate Government ministries. The cash assistance model that is eventually handed over to the GoG must itself be high-quality to ensure it incorporates everything NGOs have learned thus far. NGOs must work together to hone what high-quality cash assistance should look like in practice in the Greek context for hand-off to the GoG.

Centralizing roles that currently take significant time from each NGO as recommended will free up capacities across agencies that should be redirected toward growing the evidence base and systematically documenting lessons learned for programmatic decisions and future handover to the GoG.

INTRODUCTION AND BACKGROUND

Since January 2015, over a million refugees and migrants have landed on Greek shores escaping conflict or persecution in the Middle East, North Africa or South Asia. Most have fled the brutal civil war in Syria. A majority of these refugees have arrived in Greece by sea from Turkey, with an average of 3,000 refugees arriving daily on the island of Lesbos during the first six months of 2015. Since initially refugees were only passing through Greece on their way to Northern parts of Europe, the GoG and civil society stakeholders focused response mechanisms and services to provide for people on the move.²

The first cash assistance programs in Greece began on the islands of Kos and Lesbos in November 2015 as a way to help those who were traveling through Greece on their way to European countries. Having generally fled with few belongings, refugees tended to use their savings or sell valuables along the way to support their journey. Initially envisioned to protect people as they travelled onward, cash assistance was designed to help people meet some of their basic needs enroute to Europe without relying on negative coping strategies. According to Thomas Byrnes, IFRC's Cash Delegate who helped start cash programming in Greece with Mercy Corps, "the first cash programs implemented by NGOs such as Mercy Corps were targeted to vulnerable individuals based on Protection concerns and so were targeted and small in scale." Refugees would be referred to Cash technical staff from Protection or Women's Protection and Empowerment programs. Cash transfer values were set based on the amount of money required to travel from the Islands to the mainland and stay in the Greece for two nights.

The operating context and needs changed suddenly and drastically in March 2016 when countries along the Balkan route officially and permanently closed borders to stem the flow of refugees and migrants farther north into Europe. While this resulted in a build-up of people in Greece, the EU-Turkey agreement which also passed in March 2016 helped to reduce the number of new arrivals without the promise of onward access through Greece. In addition to kick-starting official registration and initiating a pre-registration process, the GoG also started deporting some people back to Turkey.

Greece is now faced with the responsibility of providing for people stranded within its borders, unable to travel onward and without the support and services to meet their immediate and long-term needs. The GoG has utilized the military and municipalities to establish transit sites and semi-permanent camps across mainland Greece and the islands to provide accommodation for approximately 62,500³ refugees. The Government is simultaneously trying to establish mechanisms to quickly and appropriately register, evaluate and process asylum claims, relocation requests to provide access to other durable solutions.

With refugees remaining in Greece for an average of seven months, "targeted cash assistance was no longer feasible or appropriate and NGOs shifted to blanket coverage."⁴ NGOs began providing unrestricted



IRC staff prepping UNHCR winter kits in Eleonas

² IRC's Fact Sheet on Cash Assistance in Greece, July 2016.

³ Though the official number of refugees in Greece is approximately 62,500 (daily government figures are published at:

<http://www.media.gov.gr/index.php/υπηρεσιες/προσφυγικό-ζήτημα> / <http://data.unhcr.org/mediterranean/country.php?id=83>), on and off-site counts suggest the number closer to 50,000. According to NGOs implementing cash programs however, the number of people in sites in the mainland and islands is likely even lower at around 30,000, exclusive of those in apartment schemes.

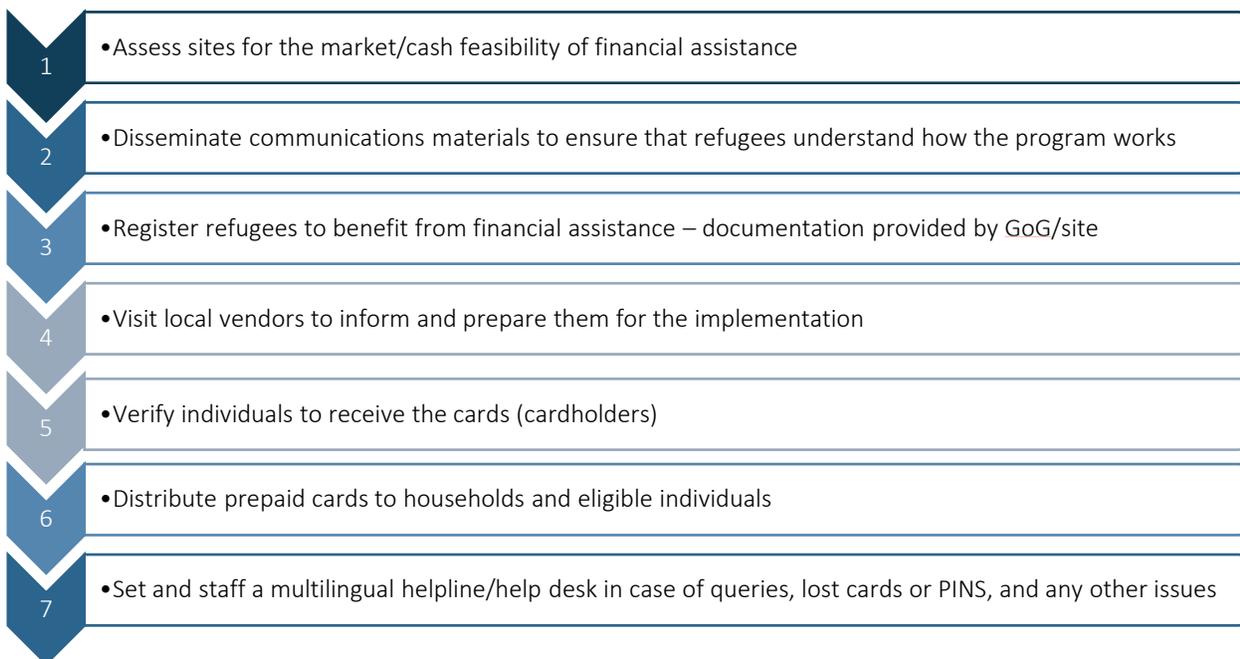
⁴ Thomas Byrnes, Cash Delegate, IFRC Greece

and unconditional cash assistance to refugees and asylum seekers who had seen their economic resources depleted to meet their basic needs, which include safe access to essential goods and services such as food, water, shelter, clothing, health care, sanitation, transportation, education, and communication.

The decision to provide blanket cash assistance as opposed to in-kind assistance in Greece was underpinned by several factors: markets are generally well-functioning; the Greek economy has an ability to absorb influxes of cash, especially on the Islands due to tourism; beneficiaries prefer the boost to their purchasing power to buy culturally appropriate products they need and prefer some autonomy in their lives; and Greeks, struggling economically since the financial crisis, can benefit indirectly from humanitarian assistance. By injecting funds into markets and resourcing refugees to make purchases, humanitarian financial assistance benefits store owners in host communities and stimulates the local economy.

Providing financial assistance through digital means such as prepaid cards has also been found to be a safer, more efficient way to deliver aid that cuts the cost of the transport, storage, and distribution of items, such as food or non-food items. For this reason, all implementing organizations delivering cash assistance are doing so via POS/ATM-enabled prepaid cards. In part due to capital controls imposed by the Greek government in response to Greece's recent financial crisis, there has been a significant push to install and use POS machines across Greece. Refugee households receive a prepaid card to purchase household and grocery items of their choice at shops that accept MasterCard or Visa transactions. Beneficiaries can also use prepaid cards to withdraw cash from ATMs. Each month, the cards are credited with top-ups based on family size.

The process implementing agencies generally follow to provide cash assistance in Greece is to:



Mercy Corps, IRC and CRS together with Caritas have been providing blanket emergency cash assistance as part of their responses since May⁵, June and July of 2016 respectively, while IFRC began in late October and Samaritan's Purse started in November 2016. By November 2016 these NGOs have delivered assistance to over 17,500 individuals in 27 sites across Attica, Central Greece – Thessaly, Epirus, Lesbos, Kos regions or islands, representing coverage of 54% of the total number of sites, with the numbers of beneficiaries and sites

⁵ Mercy began targeted cash assistance to those considered most vulnerable in December 2015, and switched to blanket coverage in May 2016

(especially in the North of Greece) increasing as additional organizations such as Samaritan’s Purse, DRC, UNHCR, Oxfam start-up cash programs and current programs scale in the coming months.⁶



IRC’s Prepaid Cards used in Greece

The Government of Greece has insisted that NGOs provide full coverage across sites including those that currently provide some in-kind assistance such as food and NFIs by January 2017.⁷ As cash assistance expands to new sites and organizations look to scale, no single agency has the operational capacity, staffing, or technical experience to provide 100% coverage across all sites and to all refugees. Not only is the Greek context operationally challenging because of variances in site management and issues with asylum registration and documentation, there is a significant learning curve for NGOs delivering assistance through prepaid cards, which requires a great deal of effort to work with FSPs to ensure effective and efficient delivery on a monthly basis while ensuring financial management and controls. There is a need to coordinate cash assistance across agencies while leveraging the diverse technical strengths and capacities of implementing organizations. It is also imperative that the coordinated cash assistance program that is eventually handed over to the Government is one that incorporates all the lessons and learning accumulated by NGOs thus far to ensure beneficiaries receive the best possible cash assistance program in the future.

OBJECTIVES, SCOPE AND STRUCTURE OF REPORT

With the continued stay of refugees and greater openness to cash-based programming from the government and donors, NGOs are planning to scale cash assistance as part of the humanitarian response to the refugee crisis in Greece.

The purpose of this research is to take stock of what has been implemented thus far, what has been learned through that implementation, and how a coordinated and coherent cash operation across NGOs might be designed with handover to the GoG’s national social welfare system in mind.

The **objectives** of this research were:

- To document current NGO cash implementation capacity and coverage
- To identify lessons learned from existing implementation (including from other NGO led consortia)
- Identify design feature recommendations for a cash consortium or alliance approach, including coordination, communication and harmonization between the partners
- Identify how a cash consortium/alliance might partner with UNHCR and the GoG

⁶ Based on Greece CWG Cash Overview as of September 2016 and NGO survey results

⁷ While a majority of sites in Greece provide in-kind assistance such as food and NFIs, after January 2017, sites will be gradually cease providing food assistance. There are assessments currently underway in preparation for a shift from partial to full MEB coverage, which are examining the ability to provide safe and economical cooking facilities so beneficiaries can purchase and prepare their own food.

Scope of work

This review focused on the use of cash assistance for meeting basic needs (food, shelter, household items). While cash assistance has been used for more specific outcomes (e.g. protection), or targeted to specific populations (e.g. most vulnerable women) and might be again in the future, the main focus of this study is on current cash assistance to meet basic needs. The review considered delivery of cash for this outcome to all beneficiary profiles – whether families⁸, single men, single women, or unaccompanied minors (UAMs), but limited to basic needs outcomes.

While the majority of beneficiaries reside in urban or peri-urban sites, there are some who have been relocated through accommodation programs to hotels or apartments in urban settings. While some agencies such as Mercy Corps⁹ provide cash assistance to those located in urban spaces, this review focused only on NGOs providing assistance through camp/site settings.

Finally, the scope of this study focuses on the technical aspects of cash delivery. While there remains a strong strategic and political backdrop to cash implementation in Greece, this review’s findings and recommendations are technical in nature, from which strategic inferences can be made, but are not within the expressed purpose or scope of this research.

Structure of the report

The report analyzes findings for specific aspects of cash programming across a program cycle. For each aspect, key commonalities, variances, lessons learned and recommendations have been summarized in the body of the report, with detailed findings for each aspect included in **Annex D**. In addition to the analysis of findings, the report highlights the results of focus group discussions conducted with IRC and Mercy Corps beneficiaries. The report rates key aspects from the analysis of findings and provides a summary of factors that inform the relative success of each NGO that participated in this research. The report concludes with a summary of GoG preferences and considerations for eventual handover of cash programming to the government, and recommendations for scaling cash programming through a coordinated approach in the lead up to handover. Annexes include a list of key informants, survey results, focus group discussion participant breakdown and list of questions, detailed findings, and finally a list of detailed recommendations.

METHODOLOGY

The methodology for this review combined four approaches. The researcher conducted desk research remotely over the course of four preparation days; and spent a total of three weeks in Greece conducting the survey, KIIs and focus group discussions.

Desk research

A review of existing materials and resources was carried out to understand the Greek humanitarian operating context, challenges, and learning to date. These materials included the 4Ws (who is doing what, where, and when) and CWG meeting minutes, as well as materials from specific organizations on lessons learned, assessment results, informational materials, etc. A list of reference documents is provided in the reference section of this report.

⁸ A family is defined as a nuclear unit, composed of a couple or single parent with children under 18 years old, while a household is a larger unit comprising “people who eat from the same pot” (WFP)

⁹ For multipurpose cash assistance it is CARE who’s going to cover and Mercy Corps were also looking into it, maybe. For relocation through UNHCR, it is UNHCR and partners (Solidarity Now, Illiaktida and a couple more through cards and UNHCR through vouchers)

Light survey

The purpose of this initial brief survey was to gather information regarding current cash assistance delivery not contained in the 4Ws, that is either quantitative in nature, or information that might require some internal coordination to answer. Two surveys were designed, one for implementing agencies focused on their data and approaches, and one for organizations planning to start-up cash activities, focused on their planned data and general approaches to aspects of the cash program cycle. Survey questions focused on caseload size; assessments conducted; transfer value, frequency, duration; approach to distributions, data collection and management; financial service provider cost structure, KYC requirements; and approach to monitoring, especially post-distribution monitoring. Seven of the eight staff have completed the survey. Results can be found in **Annex B**.

Key Informant Interviews (KIIs)

As a follow-on to the initial survey, key informant interviews (KIIs) were scheduled with staff contacts provided by the survey taker. The purpose of these KIIs was to delve deeper into how organizations are delivering or planning to deliver cash assistance. KIIs collected qualitative information on how each participating organization is accessing sites; managing relationships with the Government and site managers; conducting beneficiary registration along with inflow and outflow factors; verifying cardholders; collecting and managing data; conducting assessments; choosing and contracting FSPs; setting transfer values; administering the process for monthly-tops; executing communications strategies; collecting and responding to beneficiary feedback and complaints; and conducting monitoring of the process and impact of cash programming. These interviews were semi-structured on these themes, but open-ended on learning and lessons from each key informant's perspective and experiences with delivering cash assistance through prepaid cards in Greece.

In total, 22 interviews were conducted with staff from implementing agencies (IRC, Mercy Corps, CRS/ Caritas, IFRC), those planning for implementation (DRC, Samaritan's Purse, UNHCR), as well as members of Cash Consortia in Lebanon and Iraq, and members of the Government's MoMP. A full list of interviewees is included in **Annex A**.

Participation in cash working group meetings

The researcher had the opportunity to attend two cash working group meetings, including one specifically focused on the MEB and harmonization of the transfer value across implementing agencies. This meeting was also attended by ECHO's Greece representative, Yorgos Kapranis.

Focus Group Discussions (FGDs)

In order to delve into the lessons learned and understand how beneficiaries view various aspects of cash assistance delivery, the researcher conducted seven focus group discussions involving 80 participants disaggregated by language (Arabic and Farsi) and gender. These focus group discussions included the IRC's cash program beneficiaries in Eleonas and Mercy Corps' beneficiaries in Kara Tepe. While these FGDs enabled a deeper exploration of specific aspects of cash delivery, they are anecdotal in nature and thus not necessarily representative of the experience of the whole population.

Limitations of the study

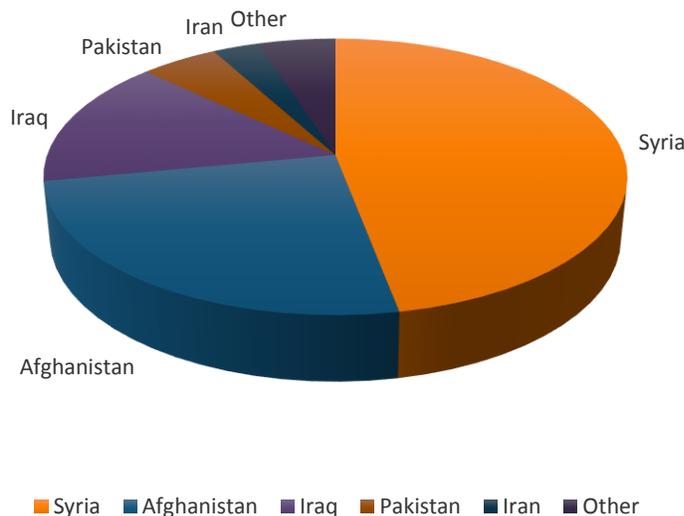
- While this review leveraged the collective experience of a wide range of staff in Greece and across levels, as well as the IRC's ERD technical unit, the researcher was in-country for only three weeks, mainly in Athens with a 2-day trip to Lesvos, and had no prior experience in the Greek context.
- The researcher only conducted FGDs with IRC's and Mercy Corp's beneficiaries and did not have adequate time to speak with CRS/Caritas beneficiaries. Additionally, the three weeks in-country were insufficient to schedule KIIs with Care and Oxfam, the Ministry of Labor (MoL) or all pertinent levels of the in-country UNHCR team; priority was given to implementing organizations or those NGOs closest

to start-up. IRC Hellas staff were able to conduct KIIs with Giovanni Lepri, United Nations High Commissioner for Refugees (UNHCR) Deputy Representative in Greece. Notes including in Detailed Findings **Annex D**.

- At the time the research was conducted, only three INGOs were implementing cash programming. The lessons learned are therefore skewed by the experiences and learning of the IRC, Mercy Corps, and CRS/Caritas. At the close of the researcher’s time in-country, IFRC started-up cash programming, reaching 450 individuals, but didn’t have any lessons learned yet.
- These findings and recommendations are based on research that was conducted in October and November of 2016. Since Greece remains a fluid operating context and NGOs are continuously working to improve cash delivery, findings in this report may quickly become obsolete. It is recommended that as organizations start or scale-up cash assistance lessons learned are systematically captured, shared and used to collectively to continue to improve program delivery.

Together with the desk research, the initial survey, KIIs and FGDs informed this report of findings and recommendations for the design of a coordinated approach to cash assistance based on learning of what has been working and what has not among implementing organizations in Greece.

ANALYSIS OF FINDINGS



While obtaining accurate data on the number of refugees in Greece is difficult, UNHCR estimates that there are about 62,500 persons of concern (PoCs) in Greece as of November 2016. 87% of arrivals into Greece come from the world’s top 10 refugee-producing countries.¹⁰ It is estimated that 47% of arrivals are from Syria, 25% are from Afghanistan, 15% are from Iraq, 5% from Pakistan, 3% from Iran, while others from the Congo, Ethiopia, Eritrea, and elsewhere make up the remaining 5%. UNHCR estimates, based on arrivals since January 1, 2016, that 42% of arrivals are men, 21% are women, and 37% are children.¹¹ Numbers for families are not available on UNHCR’s data website.

¹⁰ There might be as few as 30,000 PoCs in Greece, but exact figures are difficult to obtain for reasons articulated in the inflow/outflow section of this report.

¹¹ UNHCR, Europe Refugee Emergency, site map of capacity and occupancy, 25 November 2016.

<http://data.unhcr.org/mediterranean/country.php?id=83>.

Greece Cash Coverage - November 2016

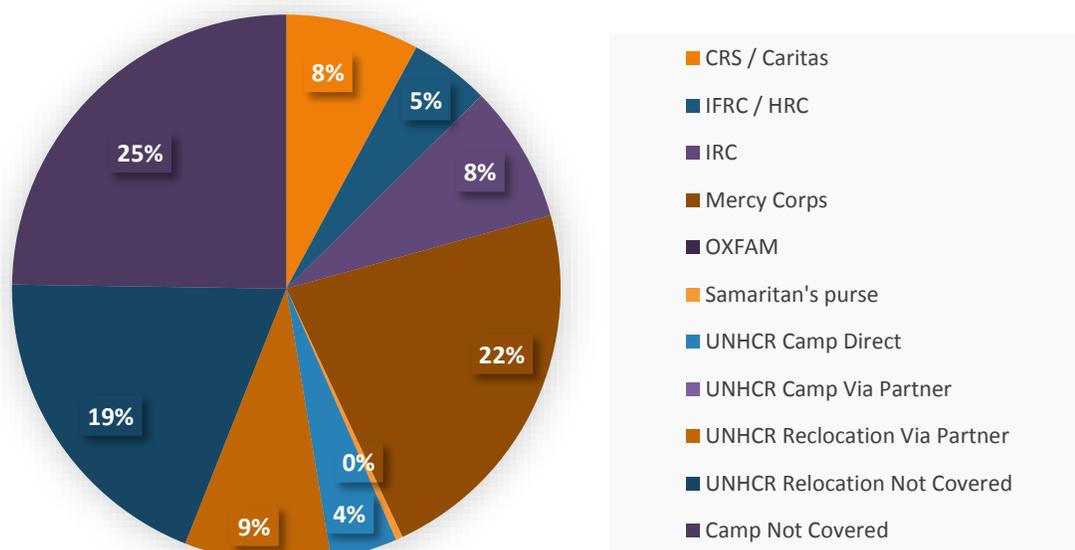


Table above by Thomas Byrnes based on caseload size across sites

KEY COMMONALITIES, VARIATIONS, AND LESSONS LEARNED

This review focused on identifying the key commonalities, variations, and lessons learned across specific factors that influence or impact cash delivery and quality. These factors include access to sites; relationships with the Government, military and/or site management; management of inflow and outflow; beneficiary registration; data collection and management; the process for verification and top-ups; assessments; payment method; approach to unaccompanied minors (UAMs); setting up FSP agreements, fee structures, and negotiating KYC requirements; setting transfer values; conducting distributions; administering beneficiary feedback and complaint mechanisms; conducting monitoring including PDMs, and planning for additional cash programming. Findings also include lessons learned from cash consortia in Lebanon, Iraq, and Somalia. A summary of key commonalities, variations, lessons learned, and recommendations are provided below, while detailed findings can be found in **Annex D**.

a. Accessing permissions to sites

Commonalities: Since Summer of 2016, the Government of Greece's Ministry of Migration Policy (MoMP) has instituted an official process for NGOs to access new sites and renew activities in current sites. The process requires written requests and the provision of detailed information on plans and learning. All agencies must comply with this new process.

Variances: How agencies fare with this process varies and depends on staff capacity, language skills, history and reputation of the agency and sometimes the site itself. Further, MoMP requirements can vary across agencies and are not fully standardized or harmonized. For example, some NGOs have to request permission for monthly top ups while others are not required to do so.

Lessons learned:

- While there is a process led by MoMP in place, and this is a positive step, more work is required for the process to be consistently applied across NGOs, and adapted to provide approval at the program level to reduce the time it takes to gain access to sites and deliver cash assistance.
- Approval for site access does not grant general access and permission to work in the site for the NGO. Access to sites is instead granted for specific activities such as registration, verification, distribution, post-distribution monitoring, and not per program.
- MoMP currently requests a great deal of information to gain access to a site, and on a monthly basis to renew approval; all communication with the GoG is required in written Greek.
- Authorization can depend on the relationship between the NGO and the person dealing with the request. The strength of organizational relationships and reputation can result in variance in responsiveness from MoMP staff to specific requests, and this can have implications for the timeliness of assistance.
- The most significant success factor for accessing sites so far is an NGO having a good and strong personal relationship with the GoG, MoMP, and the relevant site managers, which can be negatively affected by turnover of NGO staff. Success also hinges on the reputation and history of the organization in various sites.
- Some agencies like Mercy Corps have dedicated staff who liaise with the MoMP, building up relationships and trust based on reliability, personal and language skills.

Recommendations

- Create a centralized position, or co-leads within a steering committee structure across agencies, responsible for liaising, coordinating, and advocating with MoMP to obtain authorization for sites and renewals, as well as responding to procedural queries; building constructive relationships and trust with site managers to ensure effective and efficient implementation; and to advocate on behalf of NGOs to improve and streamline program delivery. This position requires strong Greek language and personal skills, and in-country experience.
- It is important that NGOs have regular check-ins with site managers, to include their feedback and inputs to help improve programming, and support MoMP's efforts to build capacity across site managers.

b. Managing inflow and outflow of refugees from sites

The inflow of refugees refers to their acceptance to reside at a particular site, whereas outflow refers to their permanent departure from a site to live elsewhere.

Commonalities: Across the board, whether sites are managing inflow well or not, no site is managing outflow effectively. This is leading to duplication and inclusion errors, and an inaccurate picture of beneficiary size, which has implications for NGOs' abilities to efficiently adhere to eligibility criteria.

Variances: Sites across Greece vary in terms of how restricted they are to individuals entering or leaving. Agencies vary in how much they prioritize eliminating inclusion vs. exclusion error, as there is often a trade-off between them. Both have implications for scalability. Whereas IRC for example has a rigorous approach for

mitigating inclusion error, which limits how efficiently it can scale, IFRC emphasizes exclusion over inclusion in order to scale up quickly.

Lessons Learned:

- Lack of outflow management¹² and flow of populations between sites are having a significant impact on NGOs' ability to scale effectively.
- Without proper outflow tracking, the main method NGOs use to manage outflow of refugees across sites involves arduous and costly registration and verification processes.
- Preventing inclusion error and “double dipping” at the individual NGO-level is very time consuming, limits scalability, and remains imperfect.
- Some sites like Schisto provide a residency number. This is helpful, but without outflow management, NGOs still spend a great deal of time reconfirming residence and family size on a monthly basis.



IFRC registration at Softex in Northern Greece

Recommendations

- Managing inflow/outflow should not be the responsibility of any one NGO. UNHCR and the GoG must help avoid duplication across sites and urban relocation programs through a centrally managed duplication tracker, which tracks de-identified registration numbers.
- There is a strong case for a single database with all actors having access that is linked to the Greek Asylum Service process.
- Sites/camp managers should share the burden of regularly updating who still lives at a site and family size, while NGOs should assist camp management with outflow management by confirming and updating lists through their visual registration and verification processes.
- GoG should incentivize site managers to manage outflow effectively and have updated and accurate figures across sites each month.

c. Beneficiary registration (Process, documentation, definitions, and data management)

Commonalities: All organizations are struggling with current GoG registration processes and official documents. Organizations collect data digitally through software such as I-form, Kobo, or Commcare, and use excel or Open Data Kit (ODK) on the backend.

Variations: NGOs vary in the documents they accept as proof of identify. Organizations providing cash assistance on the islands accept Police Notes as the GoG’s asylum seeking service pre-registration system varied between the mainland and the islands, resulting in different processes and official documentation. For agencies working on the mainland, refugees generally have pre-registration or registration documents (tri-fold asylum card). Additionally, since only some sites have inflow lists there is variance in how long it takes NGOs to conduct their registrations across sites. There is also variance in how NGOs have defined a family, which has implications for registration, allocation of cards, and the amount of assistance transferred per person. Family size is determined at point of registration.

¹² Outflow is when a family or family member moves from a site potentially to another site, is relocated into an urban program, or leaves for Europe.

Lessons Learned:

- Agencies rely on government or police-issued documents to determine beneficiary identity, but there can be significant issues with documents and registration processes in Greece¹³. For example, there are a number of documents that qualify as police documents. Additionally, some beneficiaries only have expired official documents, which can have implications for their eligibility in cash programs.
- Determining family connections is important in delivering cash assistance in Greece because prepaid cards and transfer values depend on family size and structure. This can be challenging since some refugees lose their passports or marriage certificates in transit and official Greece documents do not provide information on family ties; determining family connections requires interviewing families and triangulating information with site management and other beneficiaries. NGOs must continue to troubleshoot this information gap until the GoG identifies how to effectively manage registration system to enable quick discernment of family ties.
- It is taking NGOs a significant amount of time to verify residency at a site, and whether or not someone is receiving cash assistance from another agency.¹⁴
- While organizations have similar approaches to collecting and managing data, data analysis, results and learning are not shared systematically or through a shared database.
- UNHCR's cloud-based database is working well in Lebanon for beneficiary data management and managing feedback and complaints.



IRC staff at Schisto reviewing site mapping ahead of registration

Recommendations

- The GoG should clarify which registration documents are to be considered “official” and those documents should indicate family connections by leveraging all existing information including on police notes, where family connections are sometimes captured.
- UNHCR should help GoG and camp management with the appropriate registration procedures in a timely manner. GoG must guarantee at least a police note.
- MEAL system must be harmonized through a single database and data infrastructure, tools, server, baseline, monitoring must be aligned in order to effectively capture and aggregate comparable data across agencies to ensure there is broad understanding on learning, trends, and to inform appropriate exit strategies.

¹³ In a workshop held between ECHO, MoMP, and implementing agencies on December 5th, 2016, MoMP stated that they were unable to “provide guidelines on what are the legal documents as that requires clarification with other ministries, but site management and police representative on site who know people by site and can help clarify if their paperwork is legal/valid. For those where there is uncertainty look at them on a case-by-case with site management and police.”

¹⁴ At sites such as Moria on the islands, verifying residency is not possible at all due to overcrowding and a lack of inflow/outflow management.

d. Beneficiary verification

Commonalities: All agencies conduct visual verification with cardholders on a monthly basis in order to initiate the top-up process. Organizations are being challenged with inflow/outflow management as families and/or individuals move to other sites, are relocated through an urban program, or get smuggled out of the country.

Variations: Organizations vary in how they conduct visual verification; some do unscheduled verification door to door while others verify at distribution points. This difference is rooted in how NGOs prioritize inclusion vs. exclusion errors. While some NGOs spend a great deal of time, essentially doing re-registration with cardholders door to door, not all agencies do. This has implications for how effectively and efficiently NGOs can scale while mitigating “double dipping” risks.



Mercy Corps registration in Lesvos, Greece

Lessons Learned:

- Making mistakes with verification especially those that exclude eligible beneficiaries can jeopardize an NGO’s reputation with beneficiaries, camp management, and with the government.
- Inclusion error can cause tensions among beneficiaries who resent that families or individuals who do not live at a site can simply show up for registration, verification and card distribution.
- Since outflow is not managed at the site level, NGOs concerned with preventing inclusion error are spending significant time on registration and verification, conducting in an unscheduled manner by tent/shelter. While reducing inclusion errors, this can increase exclusion errors.
- For most NGOs verification is only done with cardholders, so while NGOs receive requests to add new family members, they generally do not get requests to reduce family size unless the cardholder is no longer living at the site. Mercy Corps on the other hand verifies the presence of all family members and the transfer amount for the family is adjusted accordingly.

Recommendations

- Agencies should consider setting a certain percentage of inclusion error they are willing to accept for the sake of limiting exclusion error in a timely manner as they look to scale efficiently.
- Camp management and informants should be used to triangulate information on who actually lives at a site, family size, etc. Intel should be systematically gathered and shared across staff. Having focus groups with staff is also helpful to improve the verification process. NGOs should also collaborate more actively with site managers.
- As NGOs take on new sites and work to harmonize approaches, there is a significant opportunity for cross-learning; it is highly recommended that NGO staff implementing cash assistance are able to shadow each other during registration, verification, or distributions to learn from each other to improve and hasten their own processes.
- Once assistance has started at a site and as it progresses, NGOs should undertake systematic after action reviews as well as compiling and analyzing feedback from beneficiary feedback mechanisms.
- It’s very important to complete verification in a timely manner to ensure there are no delays with top-ups, and beneficiaries receive top-ups at the same time each month. Regularity and consistency is extremely important to beneficiaries (FGDs).

e. Distributions

Variations: Agencies vary in how they conduct distributions. Whereas some NGOs distribute door to door distributions to spend time with each family to explain card functionality verbally, others use distribution points, which can be more efficient but less personalized.

Lessons Learned: Variance depends on how sites are laid out and managed as well as diverse NGO approaches. IFRC for example can distribute in under a minute per person using QR codes. While distributions generally occur about a week after verification is complete, some NGOs are being delayed as people move in the interim between verification and distribution.

Recommendations

- Remain flexible, document and share what is working and what is not at each site. Conduct and share PDMs and on-site monitoring.

f. Process for monthly top-ups

Commonalities: Once lists of cardholders are verified (including new arrivals), top-ups are entered into FSP payment platform.

Variations: While payment platforms such as PSF, SWIFT, and MC/Segovia allow for bulk reloads, using a bulk excel template, they generally require manual entries for each card, since the transfer value is set by family size. Some platforms are additionally less suited to making multiple payments over time. SWIFT for example does not update beneficiary lists, including all beneficiaries who have ever been entered into the system, requiring manual manipulations of the excel template to reload the correct amounts on verified cardholder accounts. This can significantly slowdown the reloading process and timeline of cards. Further, some NGOs experience delays in reloading cards due to their own internal procedures. It can take up to four days between finalizing beneficiary lists and card reloading for IRC for example, due to the fact that payment requests must be first sent from IRC Hellas to IRC HQ and then funds transferred from IRC HQ to SWIFT. Finally, FSPs vary in their degrees of responsiveness, which has implications for addressing issues in a streamlined and efficient manner.



IFRC Registration in Softex, Northern Greece

Lessons Learned:

- Bulk/batch reload capability is essential to scaling and the efficient delivery of top-ups.
- Delays in verification have an impact on timing of monthly top-ups, but of significant concern is that beneficiaries do not receive top-up at regular intervals, which makes it hard for them to plan resources effectively and causes beneficiaries unnecessary anxiety.
- There is a gap in communication about exactly when top-ups will hit accounts.

Recommendations

- Choose a payment platform that allows for bulk/batch reloads.
- It is very important that beneficiaries receive top-ups at the same time each month – this helps them with planning and reduces anxiety, according to FGDs.

g. Assessments

Commonalities: Few assessments have been carried out across implementing agencies. Those that have are not widely shared, and some are small in scale or no longer relevant.

Variances: There are variances in which assessments have been carried out by agencies. Instead of conducting the entire standard set of Cash Transfer assessments, NGOs have chosen to carry out those assessments deemed most critical due to pressures to start implementation quickly. Thus far, UNHCR has carried out site assessments in relation to cash vs. catering feasibility; an interagency assessment on food and cash response preferences and feasibilities in formal sites in Greece was conducted and shared in July 2016; the IRC has conducted site and security assessments and plans to do market assessments in the North of Greece; Mercy Corps has completed urban cash, markets, and baseline assessments; DRC has done a markets and delivery mechanism assessment and will do rapid assessments for sites; Samaritans Purse has completed cash feasibility at sites, needs, baseline assessments; and IFRC had not done any at the time this research was conducted.

Lessons Learned:

- There is a break between best and actual practices. While it is good practice to carry out contextual analysis, and needs, baseline, market, security, delivery mechanism, and site assessments, the current approach in Greece is understandable as NGOs lack the capacity and are under severe pressure to implement and scale. Additionally, Greece is a developed country with seasonal increases of people and cash flow during the summer months due to tourism; markets are thus able to effectively meet sudden increases in demand.

Recommendations

- A gap analysis on assessments should be carried out and filling gaps should be coordinated across implementing agencies. Assessments that have been carried out must be accessible and NGOs should divide up future assessments so that others can benefit from them.
- NGOs should be conducting needs assessments since the original cash program and cash transfer values were designed not to meet basic needs, but rather to provide enough for resilience as people traveled through Europe. Additionally, as the MEB approach and transfer values are currently being reviewed, NGOs need to conduct needs assessments to know whether basic needs are being met.
- A baseline assessment should be carried out across beneficiaries to track progress against outcomes, especially if there is movement away from blanket coverage as the GoG assumes responsibility for cash assistance as part of NGO exit strategies.

h. Payment method

Commonalities: All NGOs implementing cash assistance in Greece are using prepaid cards. IRC and Mercy Corps beneficiaries, who reside in urban camp settings, say they prefer prepaid cards, which make them feel safer. However there is a learning curve for beneficiaries who have never used cards before, have language constraints, or are illiterate.

Variances: There is variation in the time it takes to load cards and for beneficiaries to receive funds after verification, depending on how long it takes to manually enter amounts in the payment platform. NGOs who have to make a lot of manual manipulations to the excel template can see delayed receipt of funds for their beneficiaries each month. Additionally, there is variance in how NGOs administer PINs. Some have cards with last 4-digits as the PIN; others spend time setting up PINs for each card and keep PINs in a database; and some FSPs include PINs with the card in an envelope. Finally, FSPs vary in their degrees of responsiveness, which has implications for addressing issues in a streamlined and efficient manner.

Lessons Learned:

- Beneficiaries prefer receiving cash assistance through cards and generally like having one card per family.
- The only major concern beneficiaries have with respect to cards over cash is related to the fees they incur for using cards to either withdraw or make purchases.
- Lost or forgotten PINs are a significant cause for cards needing to be deactivated. Another reason for losing or needing to deactivate cards is beneficiaries not knowing exactly how much they can withdraw inclusive of fees without going into overdraft. Greek ATMs will retain cards if PIN or withdrawal amounts are entered incorrectly three times. There is a five Euro charge to replace cards that is fairly standard across agencies. IFRC and Mercy Corps are exceptions, as they do not charge beneficiaries for replacement cards.
- Having the PIN as the last four digits of the card is a significant security risk for beneficiaries. They have shared through FGDs that this makes them feel that “anyone can just take and use their cards, and so they always carry them.”¹⁵
- Generally, no one goes through the actions of changing their PIN numbers.

Recommendations

- Continue to use cards, but create harmonized communications materials with pictures for those with language barriers, staff demos, and monitor complaints/feedback to ensure everyone knows how to use the cards and don't lose/forget PINs. Leverage what various NGOs have already done, including CRS/Caritas which provides beneficiaries pictorial instructions.
- Do not allow PINs to be the last 4-digits of the card, but instead include PINs in envelope or set up PINs for beneficiaries and store in a database. While there is a small risk of the staff member with access to the database committing fraud, this is less of a risk relative to the high impact and prevalence of beneficiaries losing cards because of misplaced PINs.
- Check in regularly with beneficiaries as well as vendors and stores to ensure beneficiaries are not experiencing issues using their cards for POS transactions.

¹⁵ IRC beneficiary at Eleonas

i. Approach to Unaccompanied Minors (UAMs)

Commonalities: There is consensus that UAMs need urgent assistance and that this approach should be harmonized across NGOs. There is also general agreement from cash coordinators that NGOs should be providing cash assistance, either coupled with financial literacy trainings or restricting prepaid cards to potentially POS only. One exception is IFRC which believes providing cash to UAMs will be complicated by the fact that those under 14 will still require a non-cash solution.

Variances: There isn't a clear and harmonized approach as to how to provide assistance to UAMs. While some organizations are providing a combination of gift cards, shopping days, in-kind assistance, or internet shopping, some organizations are waiting for the results of the Child Protection Working Group (CPWG) protection assessment to develop protocols for UAMs.

Lessons Learned:

- While Greek law allows for minors over the age of 14 to receive cash assistance, the GoG hasn't approved the distribution of cards, regardless of whether they are cards restricted to PoS-only for UAMs¹⁶.
- Fears about risks of cash assistance to UAMs which are driving discussions are too reliant on anecdotes and not evidence.
- Agencies have renegotiated with their respective FSPs to enable cash assistance to UAMs, but are waiting on the results of the CPWG protection assessment on pros/cons and risks for UAMs who receive cards.
- Some agencies such as CRS/Caritas have conducted FGDs with UAMs and are providing gift cards, shopping days, in-kind, internet shopping based on learning.
- Other agencies are concerned with the protection and operational challenges associated with cash for UAMs.

Recommendations

- While the CWG and CPWG are making some progress toward defining a suitable approach for UAMs, this issue must be urgently prioritized and harmonized across agencies.
- Base decisions of assistance modality for UAMs on evidence, not on anecdotes or fears, which are inconclusive across child protection and cash team staff. The approach for providing UAMs with assistance and the modality chosen should be based on the CPWG protection assessment or evidence of risks and mitigation strategies from cash staff.

j. Comparison of Financial Service Providers (FSPs)

Commonalities: NGOs are using untested or new Financial Service Providers' platforms to manage payments in Greece. Each implementing agency is struggling with efficiently scaling up cash delivery in partnership with FSPs. There is no one perfect FSP and scaling is proving difficult across providers, whether due to the time it takes to upload, load, activate, top-up, reconcile, obtain the necessary reporting detail, and fix glitches in the payment platform or in communicating between the platform and an NGO's data management mechanism.

¹⁶ PoS-only enabled prepaid cards effectively function like restricted value vouchers.

Variations: The IRC is using SWIFT Prepaid Solutions; Mercy Corps is using MasterCard and Segovia for data management; CRS/Caritas and IFRC are using Prepaid Financial Services (PFS); SP and UNCHR are likely to use PFS as well. FSPs vary in their fee structures, flexibility toward restricting access for certain beneficiaries (e.g. to cater for special needs of unaccompanied minors), in facilitating access to other NGOs to use cards, and in data monitoring, all of which have implications for scaling cash assistance efficiently and effectively.

Lessons Learned:

- There is value in competition among FSPs and not having a single provider, and building and tracking effective performance indicators relevant to efficient and effective scaling of cash assistance.
- In order to receive cards in Greece quickly, agencies such as IRC and Mercy Corps have leveraged global agreements negotiated at their respective HQ levels to determine FSP and negotiate fees.
- At the time of writing this report, there were the fewest complaints about PFS, but this provider was yet untested at scale and does not have Application Program Interface (API) capability¹⁷, which allows data management systems and payment platforms to communicate with each other, facilitating efficiency in payments while scaling.
- Initial tender processes were unable to include experiential factors such as the staff time it takes to upload, load, activate, top-up, reconcile and report. Experience in Greece is consistent with global trends of mismatch between expectation and delivery between NGOs and FSPs.

Recommendations
<ul style="list-style-type: none">▪ Do not move to one FSP too quickly; leverage competition for systematic learning of what works and to determine which FSP can actually deliver efficient scale-up before choosing a single FSP/data management partner for all of Greece.▪ Agencies should document and openly share their experiences with their respective FSP on key performance indicators related to payments and links to data management mechanism. Supplier performance must be deliberately tracked and evaluated.▪ Update bid criteria for future contracts. Weight other factors highly beyond cost (assuming an alliance or cash consortium model would enable better negotiated rates) such as staff time required to load cards, card issues for beneficiaries, FSP/partner responsiveness and time and resource commitment to implement systemic solutions.

k. Value of transfers

Commonalities: In theory all implementing organizations base their transfer value on an agreed upon MEB approach coordinated through the CWG. An individual should receive 90 Euros, a family up to 5 would receive 290 Euros, and a family of 6 or more 330 Euros. The CWG later defined that values should be 90+50+50+50+50+20+20, until an upper limit of 330 Euros.

Variations: Guidance on transfer values wasn't completely clear to the three NGOs implementing cash transfer programming, which resulted in variance in transfer values across numbers of beneficiaries and across sites. Each of the three agencies providing cash as of early October interpreted the guidance differently. While one NGO may have determined transfer amounts according to the number of people in the family, another interpreted the guidance to mean families of three, four, and five should receive the same 290 Euros amount.

¹⁷ API is a set of routines, protocols, and tools for building software applications and specifies how software components interact. API capability is required to push and pull information automatically between two separate software platforms, such as a payment and data management platforms.

Additionally, there is variance in whether NGOs absorb the costs of fees, which has significant implications for how much beneficiaries effectively can spend on meeting their basic needs.

Lessons Learned:

- The CWG, co-chaired by UNHCR, CRS and MoMP, has been trying to harmonize the approach to transfer values, but the underlying MEB methodology on which transfer values are based itself has issues. These include assumptions about a one size fits all approach, neglecting the role of seasonality, not delivering consistent per capita amounts, variances in prices across markets, what is included in the MEB basket, and that in-kind assistance would eliminate the need for beneficiaries to purchase their own food or hygiene items.
- Importantly, the amount beneficiaries actually receive and can spend is not the amount transferred. While single beneficiaries should be receiving 90 Euros per month for example, because of fees, they are in effect receiving much less, sometimes as much as 20 Euros less each month. The costs associated with withdrawing money from an ATM, checking one's balance, or using a card at a POS are not standard across FSPs nor local banks or POS terminals. Additionally, agencies do not all cover the costs of fees or communicate with beneficiaries about what the exact fees are. Agencies who do not cover costs are in effect not providing the total set transfer value. MoMP is very concerned that in effective beneficiaries are receiving different amounts depending on which NGO is providing cash assistance due to variances in FSP fees. MoMP has repeatedly emphasized that effective amounts must be consistent across sites and implementing agencies to avoid both push and pull factors and the tensions of unequal assistance.
- There is a clear tension between the level of cash assistance NGOs should be providing to meet basic needs and what NGOs are allowed to give and what NGOs have the capacity to deliver.
- In terms of how the MEB approach has been applied to transfer values, CWG guidance on values was given at the strata level, which left room for interpretation on how much to give various family sizes, resulting in each of the three implementing agencies providing slight variances on amounts across individuals within a family. For example, family sizes ranging from 3-5 or 7-11 receive the same amount each month. There is strong feedback from beneficiaries that this isn't fair or working for them. This is also resulting in families breaking up to game the system to receive more money.
- While beneficiaries are generally grateful for what they receive, there are three issues raised with respect to the transfer value: the amount is insufficient to meet needs, there is inequity in transfer values not being set per capita, and cash assistance is not received at regular intervals.

Recommendations

- NGOs should base transfer values on proper MEB analysis, not on constraints.
- NGOs should absorb or offset fees so beneficiaries in effect can spend the total transfer value and these effective amounts are consistent across implementing agencies.
- Deliver and communicate transfer value per capita; while some families may have additional savings at the end of the month through economies of scale afforded larger families, this is more acceptable than large families not being able to meet their basic needs.

I. Beneficiary feedback, complaints mechanisms, and communications.

Commonalities: All NGOs have some form of beneficiary feedback/complaint mechanisms and communications strategies in place. All Key Informants emphasized the importance of not only setting up feedback mechanisms and having a process for handling complaints, but also being responsive to beneficiaries.

Variances: There is some disparity between the aims of NGOs in terms of their feedback and complaint mechanisms and how these are received by beneficiaries across implementing agencies and sites.

Lessons Learned:

- The most important factor in success appears to be the amount of ground presence agencies have which allows them to be more visible and responsive. Having staff present at a site on a daily basis enables NGOs to address complaints or gaps in information and communicate policy changes more rapidly and effectively.



IRC's Frequently Asked Questions at Schisto for staff reference

Recommendations

- Have NGO staff shadow staff from other NGOs across the registration, verification, distribution, and process. This would allow for cross-learning and building a technical community of practice. This recommendation was made by CRS/ Caritas.
- Test out the entire ATM and POS process, map out likely fees, and incorporate an estimate of fees based on point of use in communications materials. This is still pertinent for beneficiaries even if NGOs absorb fees.
- Develop key harmonized communications materials and messages, and use a combination of leaflets, posters at sites, communication with community leaders, site managers, etc. More is better. CRS/Caritas have created instructions for how to use ATMs with images, which could be a helpful start. IRC is creating an instructional video that will run on loop during distributions in Arabic and Farsi.
- Conduct FGDs with beneficiaries as well as with staff to understand if there are gaps in communications materials or if complaints are not being addressed in a timely manner. Check-ins with staff skipping one level can also be helpful to ensure accountability across levels.
- Use results of complaints and feedback to inform program improvements, share results across agencies and changes back to beneficiaries so they know their views are being meaningfully considered.
- Have at least two staff per site each day and hold office hours. Provide a hotline that is toll-free to beneficiaries to collect discrete or anonymous complaints/feedback.
- Systematically analyze beneficiary preferences for feedback mechanism channels and approaches.

m. Monitoring including post-distribution monitoring



IRC staff at Eleonas starting post-distribution monitoring

Commonalities: At the time this research was conducted, few PDMs had been carried out and those that had, had not been shared. The one exception is CRS/Caritas who have shared their October 2016 PDM analysis. Other NGOs plan to conduct PDMs proximately and plan to sample 10-15% of beneficiaries. There is consensus among NGOs on a harmonized approach to questions, which should include factual questions to confirm the program was delivered as intended; analyze user-experience on delivery, NGO engagement, and with the payment process; as well as beneficiary spending and decision-making. Finally, no NGO is carrying out regular price or on-site monitoring as both are deemed non-critical for the Greek context. This should be reconsidered for programming in the North for sites that are either not proximate to markets or only to smaller markets.

Variances: There is some variation in how organizations conduct PDMs, some door to door, some through phone calls with beneficiaries with follow-up if deemed necessary, and some conduct FGDs to deepen findings from PDMs.

Lesson Learned:

- Issues accessing sites, delays in harmonizing questions and a lack of staff capacity are reasons given for not conducting PDMs in a timely fashion, which should occur between two to three weeks after distribution.

Recommendations

- Prioritize and carry out harmonized PDMs, share results, and aggregate and analyze results through a shared database.
- Ensure that PDMs are conducted by non-cash program staff such as MEAL staff, as the results can be contaminated by staff involved in cash delivery. Since not all organizations have the internal capacity to have PDMs carried out by their non-cash staff, consider other options such as joint monitoring or having an independent organization conduct PDMs.

BENEFICIARY FEEDBACK – FOCUS GROUP DISCUSSIONS

Focus group discussions were organized with IRC and Mercy Corps beneficiaries in Eleonas and Kara Tepe sites respectively. While the researcher would have liked to have spoken to CRS/Caritas beneficiaries, there wasn't sufficient time to do so. CRS/Caritas have provided their PDM analysis from distributions at Skaramagas and Elliniko.

Participants at Kara Tepe and Eleonas sites were targeted based on language due to limitations regarding the availability of translators, with Arabic and Farsi prioritized because of their preponderant numbers at each site. Groups were disaggregated by gender and precautions were taken to conduct FGDs without any staff involved in implementing cash assistance. Additionally, participants were assigned a number and no identifying information was taken during these discussions. These steps were taken so participants would feel comfortable speaking anonymously, honestly and candidly.

The initial focus group veered from this methodology due to a lack of Farsi translators at Eleonas. The result was combining men and women into a single discussion, with the aim of having only one member of each family attend. While steps were taken to try to hold the discussion in a private space, due to space limitations, the discussion occurred in a space where people could see the group, and Farsi speaking refugees joined throughout the discussion, including some spouses and children of those already in the group. This resulted in a much larger and noisier group than intended and certain participants were able to dominate the discussion.

All of the six subsequent focus group discussions were small and disaggregated by gender and language, and held in more private spaces to mitigate the experience from the first focus group.

The researcher began each focus group with a script explaining the purpose and structure of the focus groups and then taking down demographic information of each participant. See participant breakdown, and discussion script and questionnaire in **Annex C**.

While these findings have been shared with the appropriate IRC and Mercy Corps staff and no corrections, refutations or contradictory information have been furnished, these findings are reflective of only those beneficiaries included as participants and not necessarily representative of the experience of the whole beneficiary population. Yet the degree to which there is general unanimity to these findings across language and gender groups, as well as sites, helps to validate the findings.

SUMMARY OF FINDINGS

Ease of receiving cash

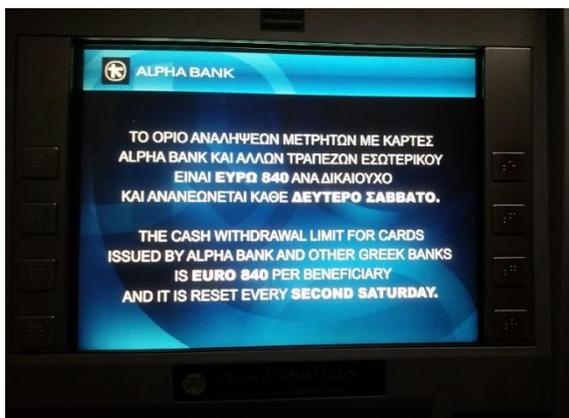
There is a learning curve as beneficiaries are generally unaccustomed to using cards, ATMs, or swiping at POS machines. This curve is compounded by language constraints and the fact that generally only cardholders receive instructional materials.

For beneficiaries across the two sites, Kara Tepe and Eleonas, using the cards to make purchases or withdraw cash from ATMs was difficult at first and got easier over time. For female Mercy Corps beneficiaries at Kara Tepe, it was initially hard to use the card as they didn't know exactly how to use it and had issues withdrawing money from ATMs. Farsi speaking women reported feeling afraid to use the card initially for fear that the ATM machines would take the card if they entered the PIN incorrectly, so they chose to use the cards at POS machines instead of withdrawing cash. The same beneficiaries have all since learned by instruction from others and now say that they don't have any issues using the cards. It appears that Mercy Corps provides a paper instructions with guidance on how to use the cards, but some of the women can't read and the guidance generally stayed with the cardholder. Additionally, beneficiaries are not aware of the capital controls in place and have had issues withdrawing more cash than is allowed during a set period of time.

For IRC beneficiaries similarly, where people are unaccustomed to using cards, are illiterate, or face language barriers, there are issues initially using the card at ATMs, since ATM prompts are in Greek and English. Beneficiaries tend to get help from each other, or in the case of Kara Tepe have received help from passersby. Some beneficiaries at Eleonas complained of the card not working at the pharmacy initially and being required to go withdraw cash to buy medicine.

Almost all participants walk to withdraw cash or make purchases with their cards. Walking takes more time for women with small children and for those who are elderly or disabled. For those who have trouble walking, accessing cash assistance can either be difficult or more expensive if they take the bus or a taxi.

In Kara Tepe, beneficiaries either shop at two large supermarkets very close to the site that accept POS transactions, or walk 25-30 minutes to the town of Mytilini to withdraw cash. All beneficiaries say that the walk to town is too long, and carrying back items can be difficult, but more women complained about the distance than men. Women in Kara Tepe also related that it takes them longer to walk to town since they usually have small children with them. It is difficult for the elderly and disabled to walk to town, so they either go less frequently or take a bus or taxi to town.



Example of a notification on capital controls at Alpha Bank

Since the site of Eleonas is situated close to a metro station, beneficiaries located at this site will shop at supermarkets near the site that accept POS or withdraw cash from ATMs nearby or in the city center (Omonia) where beneficiaries say that items are cheaper. Beneficiaries also use cash for shopping at smaller stores that don't accept POS but are cheaper, such as ethnic food stores or at the Sunday Eleonas Bazaar. While for men the metro is a 10 minute walk, it takes women with children 15-20 minutes to get to the metro Eleonas. The walk itself is not ideal as the way is through an industrial area and there are few sidewalks along the main road. Beneficiaries generally use the metro, but also take the bus to the city center.

While there were no reports of taxation or exploitation at Kara Tepe and Eleonas, beneficiaries incurred costs in accessing cash assistance across both sites. Beneficiaries incur significant fees and penalties for using cards,

withdrawing cash, and for checking balances at ATM machines. While some of these costs are charged by the local ATM or POS payment facilitator, the majority of these costs are charged by the FSP used by the NGO. Both IRC and Mercy Corps do not cover these costs.

Due to a lack of understanding of the exact amount of fees, when and how they are charged, there is widespread perception that money is being lost from the cards. Farsi speaking beneficiaries at Eleonas were very upset about lost money and did not know that they were in fact incurring fees, saying they “lost as much as 40 Euros and don’t know why.” One issue is that while balances online show in USD, amounts can only be withdrawn in Euros, so when beneficiaries try to withdraw more than they actually have, they perceive this as lost money. Mercy Corps beneficiaries at Kara Tepe seemed to know that they were incurring fees, but felt that this was unfair.

At Eleonas, some Arabic speaking men said that they withdrew more money to avoid the fees, which made them feel less safe, while Arabic speaking women complained of tensions with those not living at the site receiving money and perceptions that this was affecting how much they were receiving. “They are taking the money from us, who actually live here.”

At Kara Tepe, some beneficiaries reported that there weren’t enough guards at the site, and there were fears about leaving the site at night as there are “some racist groups outside the site.” An Arabic speaking women at Kara Tepe reported having all her money stolen from her shelter. Farsi speaking men joked that they weren’t receiving enough money for people to fight over it.

Payment method preferences

Beneficiaries generally like and prefer the card over cash as they feel the card is safer. There are several issues raised however.

- One elderly Arabic speaking women at Kara Tepe said she preferred cash because using the card was hard, having to first travel a far distance to withdraw cash and then to go shopping, which took a lot of time.
- When the program is delayed, some beneficiaries reported losing one month of assistance. A majority of the Arabic speaking women at Kara Tepe complained that they were told they would receive assistance on the 24th of one month, but didn’t actually receive it until the 17th of the following month.
- One Farsi speaking man in Kara Tepe reported that a store had overcharged his card and was not given a receipt. He was alerted to the overcharge by another store owner who could look up transactions against the card.
- Beneficiaries in Kara Tepe didn’t know how to look up their balances. This is both a result of not having internet access or not knowing how to check balances online.
- Additionally, beneficiaries at Kara Tepe complained that they can’t get small amounts from the ATM machine and carrying larger sums of money made them feel unsafe.
- Beneficiaries at Eleonas have also complained about the PIN being the last four digits of the card. This makes them feel less safe. People complained of being afraid that if someone stole their card, they could steal all their money.
- Beneficiaries also raised concerns over being charged fees for using the card and wondered if they would receive more money if they received cash.
- Finally, Farsi speaking beneficiaries at Eleonas said they would like more flexibility on who can sign for the card. “It would be better to have 2 cardholder names per card.”

Access to markets

Everyone said that they can find what they need in local markets. All participants complained about the prices being very high, but there is conflicting information about where the prices are cheaper. Some at Kara Tepe said that shopping at Lidl¹⁸ was cheaper, while others said the small shops in town were cheaper.

Beneficiaries at Eleonas travel further to make purchases at cheaper shops or wait until the Sunday Bazaar, but feel the things they really need like shoes and winter clothes are extremely expensive.

Markets are accessible, but beneficiaries at Kara Tepe complained about the distance to markets in town, while those at Eleonas complained of the cost of traveling to Omonia which has cheaper prices and more culturally appropriate stores.

Beneficiaries at Eleonas said they don't have any issues, but beneficiaries in Kara Tepe complained of having language barriers while shopping. Farsi speaking women at Kara Tepe said that they sometimes feel discrimination around the site, saying that "some of the store owners think we will steal and so don't let us touch anything." Farsi men also complained of the same issue, saying "based on our appearance, they know we are refugees and they don't let us touch the fruit or vegetables or even read the ingredients."

Adequacy of transfer value

Beneficiaries are using a large percentage of their cash assistance in ways that make the provision of in-kind assistance such as food or medical services in camps redundant, as both are perceived as poor quality by beneficiaries. One beneficiary said that "more than half of their assistance each month goes to medicine and the rest is spent on food."

Beneficiaries across both sites are using some of their cash assistance to buy food. At Kara Tepe, beneficiaries said that the food served by site management was either raw or not cooked well. A Farsi man elaborated that the site served macaroni a few times a week, and then on other days, bad parts of the chicken like the wings and rice. Beneficiaries reported buying things to make the food better such as salt, oil, herbs, sugar, but also bought food like fresh vegetables and milk for children. They also reported buying things to make soup in winter months. Several individuals said that they couldn't eat the camp food since they were diabetic and it is a carb-heavy diet. Another woman joked that "Syrians like to eat and good food is comforting, which helps them feel better about being at the site."

At Eleonas, beneficiaries echoed the same sentiments, complaining about the quality and cultural appropriateness of the food. Some also said that being diabetic made eating food at the site dangerous. Beneficiaries spend money on fresh vegetables and meat and also reported needing to buy milk for babies.

The second largest purchase category is medicine and doctor visits. There seems to be an array of illnesses including diabetes, anemia, physical injuries, high blood pressure and heart conditions. According to focus group participants these conditions require visits to off-site doctors because at both sites, medical services are only emergency in nature without specialized services offered. Beneficiaries at Eleonas said that whenever they visited the medical staff at the site, unless they sustained a physical injury, they were told to drink more water as the only medical advice they received. At Kara Tepe, beneficiaries said "the doctors are very few, general and only give basic medical - emergency services and getting an appointment with them can take months, and there are no doctors at night; no dentists and no doctors for children or older people."

Finally, almost everyone reported buying non-food items such as warm or conservative clothes, shoes, or diapers for babies. "We lost clothes in the sea and don't have clothes, we need clothes for winter for children." At Kara Tepe, an Arabic speaking man said that "clothes that are given are used and not good for us and we

¹⁸ German global discount supermarket chain

get one thing per month.” People are also buying feminine products and diapers for babies since the quality of the ones provided at the hygiene kiosks are poor.

About half of the participants across both sites said they use some of their cash assistance on SIM cards or internet credit. One person said that they use some of the cash to buy cigarettes.

While beneficiaries are generally grateful for what they receive, there are three issues raised with respect to the transfer value: the amount is insufficient to meet needs, there is inequity in transfer values not being set per capita, and cash assistance is not received at regular intervals. Importantly, the amount beneficiaries actually receive and can spend is not the amount transferred. While single beneficiaries should be receiving 90 Euros per month for example, because of fees, they are in effect receiving much less, sometimes as much as 20 Euros less each month.

Almost all of the participants feel the cash assistance is inadequate to meeting their needs. A majority of people say that “the money is gone by about halfway through the month.” The cash assistance does not seem to be adequate regardless of whether a person is single or in a family across both sites. “330 Euros for a family of 7 is not enough” and “the money is very little and not enough for children and sick people.”

There is a lot of tension around the fact that the amount of money is not set per capita, with beneficiaries complaining that a large family with 11 people receives the same amount as a much smaller family. “The same amount across family size is not fair, each person should have the same amount, but can be smaller for children.”

Finally, there are complaints about not receiving cash assistance every month at the same time each month. Beneficiaries across both sites have complained about delays in programming affecting the amount they have received so far. “They might be late giving us money [by] one month because of delays in Moria because of some incidence there.”

Generally beneficiaries say they are not able to buy all the food, medicine, clothes, phone credit they need. There are also specialized items like prescription eyeglasses or shoes for the bathroom they can’t afford. All of them said the cash assistance is not enough to buy more food like meat, fish and fresh vegetables, cooking fuel, powdered milk for babies and food for picky teenagers. Beneficiaries at Kara Tepe are struggling to pay for transportation to medical appointments, while those in Eleonas are struggling to buy prescribed medicine or travel to referral appointments. Both groups say that medicine is very expensive as are warm or conservative clothes, and clothes for kids and babies. “Baby stuff is very expensive, a stroller can cost 70 Euros.”

Finally, while not basic needs, some beneficiaries related that they would like to invite guests over to their home to eat or buy make-up and detergent and are unable to do these things.

Beneficiaries across both sites are resorting to negative coping mechanisms to meet their needs. While a few participants said they are being sent money from relatives already in Europe, a significant number of beneficiaries are borrowing money from neighbors or relatives. Some are selling valuable items such as wedding rings or jewelry or land in their homeland, some are selling their phones. Despite complaining of the poor quality of clothes provided through donations, a majority of beneficiaries at Eleonas said they are rummaging through garbage for clothes and other items. Some beneficiaries have found ways to earn small amounts of money, either through recycling cardboard or doing henna tattoos or eyebrow threading at the site. Others say that they just make the money last as long as possible and go without some of the things they need. There are rumors of women prostituting themselves at Kara Tepe, but the researcher could not substantiate these claims.

Relations within households and with the host community

Generally, participants said there weren't any conflicts at the site because of cash assistance. But one Farsi woman at Kara Tepe said, "No conflicts, but we fear theft so hold the cards on our persons all the time."

A Farsi woman at Eleonas said that there is a lot of fighting in the household since her father and brother in law arrived. She related that "sometimes people are traumatized by the war and so have issues with money because of that."

Generally beneficiaries report either no change or positive change as a result of the cash assistance. They say that there is less fighting because at least they have some money. "It's better now because we can buy food, but need more money, with more money, we would have even better relationships."

There don't seem to be issues regarding how the household makes decision on spending. At Kara Tepe, Arabic speaking women joked that "women take all the money" and "I just take the card and use it." Farsi men at Kara Tepe said that "we make decisions together [on how to spend funds]." At Eleonas, Arab men also joked that "women take all the money for food." Arab women corroborated laughing saying, "we do take all the money."

While a majority of participants said there aren't any disagreements on how to spend money, one woman at Kara Tepe said that there is "fighting only because kids are always asking for money." At Eleonas only one person said that there are disagreements because the money is very tight."

Participants were almost unanimous in saying there aren't any issues with receiving one card as a family. Beneficiaries said that they "don't want to split the same amount of money between cards because of the fees."

Generally, people are not facing maltreatment from the host community because of the cash assistance. While Farsi speaking women said that they feel discrimination against Afghans and that Syrians get better treatment from the site management and UNHCR, this is not specific to cash assistance.

At Eleonas, there are generally no issues, although some Farsi speaking beneficiaries said that the bus doesn't stop for them and sometimes Greeks can be rude. One man said he had been spat on.

One Arabic speaking man in Kara Tepe said to the group, "Can we be really honest? The Greeks have been very good to us. We have a similar culture and they have been very generous to us." The group all nodded in agreement.

NGO Responsiveness to issues and complaints

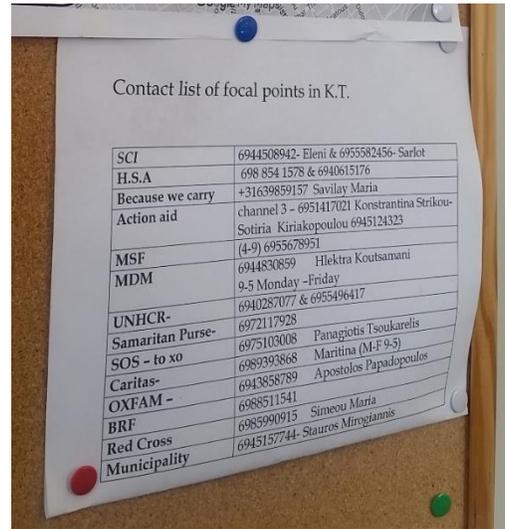
There is a significant divergence between perceptions of NGO responsiveness at Kara Tepe and Eleonas. IRC has significantly more staff than Mercy Corps as well as fewer sites. This means that IRC staff are present at Eleonas every day and hold daily office hours to register complaints. IRC's ground presence and visibility are reassuring to those living at Eleonas.

At Kara Tepe, Arabic speaking men said that as cardholders, they received a paper along with the card which has a contact email and phone number for Mercy Corps, but some people have lost the paper and it appears not all non-cardholders know about this paper. One man related that while they never explained to us how to use the cards, while another said "the written instructions were good." Farsi speaking women said that they "were given a personal number for someone at Mercy Corps, but there is never any answer." Arabic speaking women said they "don't have [Mercy Corps'] number to their hotline, don't know how to get in touch, they are not here at the site most of the time." Farsi speaking men said that there is no clear process or information about dates or amounts. Beneficiaries generally didn't know how to get in touch with Mercy Corps staff, but when they did complain, staff "would always say they will fix it next month." While there is a Mercy Corps

office in town, “when I went there it was closed.” The researcher also noted that there are no Mercy Corps posters and no contact details at the information kiosk in Kara Tepe.

In contrast, at Eleonas the impression beneficiaries have of IRC’s communication is quite positive. Arabic speaking men said that “IRC communicated the process and about the fees and staff are very nice and great.” Arabic speaking women agreed saying, “we were very informed, have a paper explaining the program. “There are no issues with the staff who are very friendly and treat us very well.” Farsi speaking beneficiaries also agreed that IRC staff are very good.

Beneficiaries did relate that while they know how to complain to IRC staff and appreciate their presence at the site every day, that the IRC is very slow to fix mistakes, which has resulted in losing a month’s money for a few of the participants. Another man said that he lost 3 months of assistance because IRC didn’t add the additional babies he was caring for. There is widespread perceptions that beneficiaries pay for the NGO staff mistakes.



Contact list of focal points in Kara Tepe

Learning: How can the program be improved?

Nearly everyone said that **more money** would improve the program. When pressed about how much money was enough, an Arabic speaking man said “150 Euros for an individual was enough and add maybe 100 Euros for every additional person.” Beneficiaries also said that **money should be tied to people’s needs** in some way; elderly people need more trips to the hospital and for medicine, which is expensive in Greece. Others added that the “amount of money should be **tied to the number of people in a household** as the amounts right now are not fair at all.”

Others said that amount of money is less important than receiving it at the **same time each month** and not losing a month of money because of **programming delays**. It would be great to get money consistently on the first of each month to help beneficiaries plan. Participants said they would like some help with saving and making the money stretch further. The researcher noted that beneficiaries at both sites didn’t know how long the cash assistance would last and were **anxious** about not receiving cash assistance in future months.

Communication should be improved to help beneficiaries know exactly how much they will get after fees, when they will receive top-ups and how long the cash assistance will last. NGOs should also provide instructions for using the card at ATMs and POS with pictures for those who don’t have English skills or are illiterate.

Finally, since ATMs are hard to access from Kara Tepe, there were suggestions to somehow bring ATMs closer to the site or have POS stores do cash back.

SCORECARD: WHAT IS WORKING AND WHAT IS NOT?

Scorecard: Research Findings				
Working	NGO relationships w/ camp/site management & MoMP	Payment method	Negotiating KYC requirements and information gathering	Distributions
Working well enough	Assessments		Setting up FSP agreements	
Not working	Access to sites	Managing inflow & outflow	Beneficiary registration	
	Beneficiary verification	Process for top-ups	Approach for UAMs	
	Value of transfers	Beneficiary feedback and complaints	Monitoring	

A clear pattern emerges from these findings. Generally, the elements which are working well for implementing agencies in terms of effective and efficient cash programming in Greece, are those that are either already harmonized or where variations are not consequential for programming. Those elements which are working well enough are those that have either occurred at NGO global/HQ levels and thus handled outside of the country or deemed by NGOs to be unessential for programming in Greece such as having a wide range of assessments. Finally, those elements which are directly impeding the ability of NGOs to deliver high-quality cash assistance at scale in Greece, and thus not working well, are those where there are significant variations in approaches across NGOs. Harmonization, centralization of roles and advocacy for these specific areas will yield greater value for effort toward scaling improved humanitarian cash assistance and should be the focus of those who can affect change, such as the government, NGOs, coordinating bodies, and donors.

FACTORS THAT HAVE CONTRIBUTED TO PROGRAM SUCCESS OR LEARNING

With its **significant ground presence**, IRC has a lot of visibility at sites, which has resulted in focus group participants unanimously saying that they know how to get in touch with IRC staff. IRC has also been lucky in finding very **capable and empathetic field staff** both as officers and community workers, resulting in perceptions from beneficiaries that IRC staff are very kind and take the time to hear them out. The IRC has been working on creating scalable systems and procedures for more streamlined delivery. IRC's **complaint mechanisms** took time to develop, but are now working in a streamlined fashion.

The IRC has seen a significant amount of turnover, and while this has resulted in some inconsistency, it has also enabled reflections on lessons learned and an ability to course correct in substantial ways. Since the IRC started cash programming in June of 2016, there have been three different technical program coordinators overseeing IRC's cash program. Part of this is due to the response starting as an emergency led by IRC's

Emergency Response Team, and it's partly due to the difficulty in securing visas for non-EU citizens, resulting in three-month time limits for non-EU technical coordinators. While exiting ERD coordinators have been able to leave behind insightful recommendations, and programming has benefited from the fresh perspectives of incoming ERD coordinators, such rapid turnover without time for proper handover has resulted in loss of institutional memory and slow or stalled progress at times.



Mercy Corps was the first actor to start up cash programming, and was the only cash actor for several months, which gave the NGO space to test and innovate without needing to coordinate efforts or worry about duplication across sites. While Mercy Corps has felt a bit of pressure to pick up additional sites quickly, the scale up of their cash program has been very impressive. This is likely owed to the **high capacity and strong commitment** of their staff. The GoG has also been thankful to Mercy Corps for stepping in as the first cash actor

and scaling up across 20 sites. Mercy Corps enjoys a strong relationship with the MoMP and has a reputation of being **reliable and delivering on promises**. Covering so many sites has of course resulted in staff being overstretched and nearing burn-out, but Mercy Corps is planning on hiring more staff. They are however challenged with the same visa restrictions for effective recruitment, especially to hire for the required language skills. Additionally, Mercy Corps brought on a **staff member dedicated to liaising** with the Government for access and this has not only ensured continuity for building trust, it has also meant that implementing staff are not burdened by access issues. Additionally Mercy Corps has a very **adaptive and inclusive approach to problem solving**. When stumped on how to proceed, they will revert to asking beneficiaries or staff through focus group discussions. They leaned for example on field staff to determine their approach to inclusion and exclusion. They hold regular meetings with field staff. **Flexible funding** has been to the advantage of Mercy Corps delivering cash assistance in Greece. Finally, Mercy Corps has done a good job with organizational planning and using its finite resources efficiently.

CRS/Caritas sees itself as a good provider of cash assistance due to their ability to do **quick and efficient distributions without rushing**. They have recruited volunteers to help them **surge** when needed. The first distribution required 60 people, while the last required only 8 staff. Having conducted distributions across four sites with a slightly different approach to design each time, they also have the **ability to adapt programming to sites and learning**. Additionally, CRS/Caritas has been very open to sharing their learning and mistakes with those external to the organization, which is extremely valuable in creating a technical community of practice. They also **cover fees for cards** which means they are effectively truly transferring the total value determined by the CWG. CRS/Caritas also relies on **community leaders**, identified through DRC's SMS or camp managers, but are discrete in asking direct questions that may put community leaders' credibility in jeopardy.

IFRC is able to lean on the Hellenic Red Cross branch, which has a **deep pool of about 40-50K volunteers**, as well as other branches of the Federation, including expats from various European branches for short periods of time essentially for free. This means IFRC has a **lot of staff capacity** when needed. The Hellenic Red Cross has been in Greece for 130 years with a sub-branch in every major Greek city, which affords IFRC a lot of **community acceptance**. They also have a good number of **Arabic and Kurdish speakers**, which helps with translations of communications materials and answering hotlines.



Samaritan's Purse has the **capacity to scale** up quickly due to extensive operations staff and offices. Relationships with camp management are very strong because of **SP's reputation** in delivering NFIs, shelter, and winterization kits, and stepping in to do emergency food distributions. Beneficiaries have come to know SP, which is on all five of the islands. SP has been given approval for various sites, and teams are ready to move, but waiting on the GOG for the North. SP is facing a very different context as it expands onto the mainland. It is hard to translate lessons from a context where people were on the move to one in which they are stationary.

While DRC had not started cash implementation at the time this report was written, DRC has a strong reputation in **monitoring and evaluation, protection monitoring, legal aid, and distributions**. With about 250 staff in country and rising, DRC has the numbers to deliver high quality cash programming in Greece. DRC is a bit concerned with building the capacity of national staff who generally lack experience working in humanitarian responses. In order to coordinate the response and government interface, DRC is very interested in a Cash consortium/alliance approach to assure quality, leverage technical experience and learning. DRC also feels strongly that a single agency approach lacks accountability, if that one agency gets it wrong, there is no back-up plan for beneficiaries who are the ones to suffer.

GOVERNMENT OF GREECE PREFERENCES AND PLANS FOR HANDOVER

The Government of Greece has emphasized an urgent need for full geographic coverage of all sites with cash (starting Jan 1st) with no duplication or gaps. The Government has also stressed that NGOs must harmonize delivery of cash assistance in order to limit push/pull factors caused by some sites receiving more or less cash assistance. They have requested, for example, that in the North, NGOs align their fee structures so beneficiaries receive the same amount after fees. While re-negotiating fee structures will take time as contracts tend to last for one or two years, NGOs should absorb fees to ensure that beneficiaries receive the total amount of the intended transfer. Finally, the GoG has expressed a strong desire to have whatever different approaches are being explored be systematically tested, evaluated, with lessons learned shared.

As the number of beneficiaries in Greece continues to ebb due to fewer new arrivals and a majority of families being either relocated or re-unified with family members outside of Greece, it is expected that funding for humanitarian assistance in Greece will likely decrease over the next 18 months. While for many of those who are granted asylum and the right to work in Greece, no future cash assistance will be needed. However there may be a need to continue to provide cash assistance to those who are unable to become self-sufficient through the right to work due to vulnerabilities such as disability, age, single headed-households, etc. It is currently planned that those who remain vulnerable will be absorbed into the Greek social safety net system, which already provides vulnerable or unemployed Greeks with cash assistance. It is therefore imperative for NGOs currently providing cash assistance to plan for the eventual handover of their cash programs to the

appropriate Government ministries. The system that is eventually handed over to the GoG must itself be high-quality to ensure as the GoG takes over assistance, its delivery incorporates everything NGOs have learned thus far. NGOs must work together to define what high-quality cash assistance looks like in practice in the Greek context for hand-off to the GoG.

While NGOs are starting to think about developing an exit strategy for eventual handover of beneficiaries to the GoG's National Social Safety Net, handover timelines remain unclear, and will be determined when a threshold of caseloads have achieved the right to work. Efforts are currently underway between the Ministries of Migration Policy, Labor and Finance to review existing means-tested social safety nets and scope out the possibility of their extension to refugees and asylum seekers. At present, conversations with the GoG's MoMP are therefore focused instead on the more immediate need to harmonize and develop a one FSP, one database and one card system approach to implementation across NGOs as of April 1st.

Discussions on more specific possibility for inclusion in the social safety nets (currently being reviewed) is unlikely before the summer and before the asylum process has been concluded. A final consideration may be that if Greece heads into elections in 2017, changes in government leadership could alter the current operating context for cash programming, and could affect how smoothly cash programming is handed over to the government.



IFRC registration at Softex camp in Northern Greece by Poul Henning Nielsen

RECOMMENDATIONS FOR SCALED DESIGN

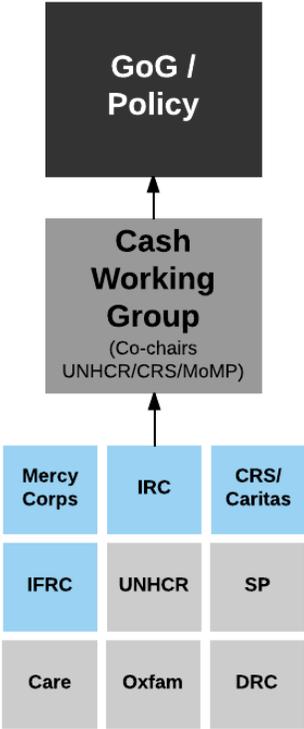
1. Effectively harmonize approaches to cash implementation

There is a strong rationale to harmonize cash implementation through a coherent approach to scale effectively and efficiently, as no single agency has the capacity to deliver cash assistance at scale and an uncoordinated approach is inefficient. Harmonization efforts have thus far been spearheaded by the Cash Working Group, co-chaired by UNHCR, CRS and MoMP. While there have been some successes especially in planning for implementation in the North, roles and decision-making on cash policy, strategy, and technical factors remain unclear, disorganized, or unresolved. Since the CWG has a split mandate of coordination, government interface, and harmonization on technical practice, and weak enforcement capacity, the CWG is challenged to achieve its various mandates effectively.

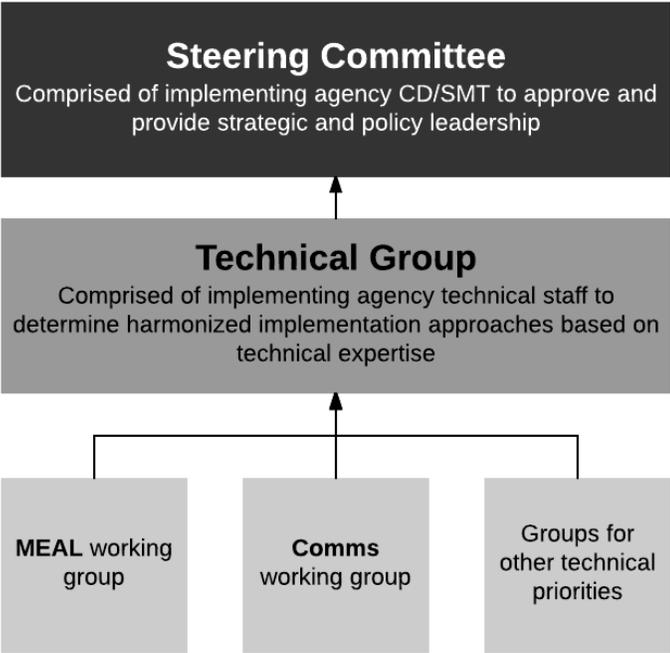
2. Create a structure for successful harmonization

In order to effectively harmonize while leveraging appropriate decision-making levels, is important to split strategy and policy, technical and coordination roles with a proper governance structure. Based on learning from Cash Consortia in Lebanon and Iraq, it is recommended that a Steering committee comprised of implementing agency CDs/SMT approve and provide strategic and policy leadership, while technical staff can leverage their expertise and implementation learning to determine harmonized implementation approaches in a technical group. NGOs need a safe forum to share their assessments, evaluations, lessons learned to improve practice and learn from each other. Finally, working groups or taskforces should be formed for technical priority areas such as MEAL and Communications.

Current approach



Coordinated Approach - Alliance/CC



* Implementing NGOs are represented by the color blue

3. Prioritize technical decision-making based on evidence and learning and adopt a minimum standards approach

Since Greece remains a fluid context, it is recommended that as organizations start or scale-up cash assistance lessons learned are systematically captured, shared and used to collectively improve program delivery. While there is significant and appropriate urgency to deliver cash assistance, there has been a rush to both implement and coordinate without the requisite learning from doing, assessments, evidence and technical expertise to underpin implementation and coordination. Part of this urgency is driven by need to provide cash assistance to beneficiaries to meet their basic needs quickly, but unfortunately part of the rush is driven by competition over funding sources and funding timelines. This push to coordinate before knowing exactly what to coordinate on has led to poor technical decisions being mainstreamed across agencies, without the result of actual harmonization. An example of this has been the MEB and transfer value – see section I. In addition to providing high-quality cash assistance to beneficiaries, the system that is eventually handed over to the GoG must itself be high-quality for the sake of our beneficiaries. NGOs must work together to hone what high-quality cash assistance looks like in practice in the Greek context for hand-off to the GoG.

The technical decisions that require urgent prioritization include:

- Transfer value based on MEB, delivered per capita and exclusive of fees, at same time every month
- Definition of a family consistent across agencies
- Approach to UAMs based on Child Protection Working Group recommendations and evidence of risks and mitigation strategies
- Communications harmonized and consistently applied.
- Beneficiary feedback and complaints administered to meaningfully inform programming improvements

4. Determine roles based on strengths and capacities

There is inefficient duplication of roles and responsibilities across agencies as each obtains access to sites, liaises with partners/ providers, manages data, distributes and reconciles cards, manages complaints, etc. Through experience, agencies have comparative strengths that must be leveraged.

As agencies scale, specific functions should be centralized across agencies. Roles should be determined based on comparative advantages/strengths and capacities of agencies. Centralizing roles across agencies that are currently taking significant time from each NGO will free up capacities across agencies that should be redirected toward growing the evidence base and systematically documenting lessons learned for programmatic decisions.

Strengths and potential capacities

- **Mercy Corps:** efficiency of delivery, inclusive approach to solutions, technical experience, and flexible funding
- **IRC:** significant ground presence, effectively communicating with beneficiaries, and technical experience
- **CRS/Caritas:** flexibility in programmatic approach, programmatic decisions informed by lessons learned, and technical experience
- **IFRC:** flexible funding, technical experience and responsiveness
- **UNHCR:** database management, interface and policy support to Govt. to improve site management and registration, and urban programming
- **DRC:** SMS and strong technical approach
- **Samaritan's Purse:** strong reputation based on NFI/emergency food distribution

5. Centralize government interface

A process for accessing new sites has been instituted by MoMP. While this is a positive step, there is work to be done to ensure this process is consistently applied and is adapted to provide approval at the program level to reduce time consuming approval processes.

Create a centralized position, or co-leads within a steering committee structure across agencies, responsible for liaising, coordinating, and advocating with MoMP to obtain authorization for sites and renewals; building constructive relationships and trust with site managers to ensure effective and efficient implementation; and to advocate on behalf of NGOs to improve and streamline program delivery. This position requires strong Greek language and personal skills, and in-country experience. It is important that NGOs have regular check-ins with site managers, to include their feedback and inputs to help improve programming, and support MoMP's efforts to build capacity across site managers.

6. Centralize MEAL & data management

While agencies are collecting data digitally, there is variance in how data is managed and analyzed. PDM data has been collected and share inconsistently among agencies. Data is not being systematically aggregated across agencies to analysis trends or learning, or to inform appropriate exit strategies, although significant efforts are being made to move in this direction. Finally, the absence of a shared database among implementing NGOs creates the opportunity for inclusion errors and "double dipping".

A common database that reduces exclusion/inclusion errors and cumbersome and resource-intensive verification processes, and a fully harmonized approach to MEAL and data management are crucial for improving program design based on aggregated learning, research, and evaluation, and developing effective exit strategies. It is important to ensure that this shared database establishes strict data privacy and protection protocols, especially as this national database solution is eventually handed over to the Government.

7. Do not rush toward one FSP, yet

Implementing agencies are using different FSPs, but there is no clear preferred FSP as organizations struggle with the time it takes to upload, load, activate, top-up, reconcile, obtain necessary reporting detail, fix glitches, customize, etc. This is especially concerning as organizations scale. Tender processes generally focus bid criteria on cost, coverage, time to delivery, etc. which isn't fit for purpose.

Agencies should consider a multi-card/FSP approach instead of rushing toward one-card or FSP. Having multiple FSPs means that risks are spread out and FSP competition can favor agencies. As agencies eventually move toward one-card, they should base selection on documented experiences and a more nuanced selection criteria, including staff time required to customize and fix glitches, the capacity, commitment, and responsiveness of the FSP to scale effectively, and the ability of an FSP platform to accept bulk/batch loading. Rushing to use one FSP without fully testing could be disastrous.

Finally it is important to bring in a design lead to work with partners to carry forward research report recommendations through a consultative process.

CONCLUSIONS

- If the GoG wants full coverage of high-quality programming, it must facilitate it. NGOs face obstacles that can and should be lifted through coordinated GoG action. This includes streamlining access to sites and registration processes, creating incentives for sites to manage outflow as much as inflow, and supporting flexibility in increasing transfer values.
- There has been a rush to implement, scale and coordinate and this has worked against proceeding methodically and efficiently.
- There is a significant amount of unnecessary duplication of efforts, some of which can and should be streamlined and centralized.
- Improving and coordinating cash programming will enable a smoother exit strategy and handing over a well-tested and high-quality cash program to the GoG.
- Actors must be clear and honest from the onset as to what NGOs, donors and the government want to achieve. This should dictate the direction cash implementation moves in Greece.
- While cash consortia provide mechanisms for effective horizontal harmonization, geographic coverage, research and learning, they can require a considerable amount time and work, which may not be appropriate for the Greek context. An alliance model on the other hand can be a lighter and more efficient approach, but is less rigorously tested and evaluated.
- Regardless of which coordination model is chosen, be thoughtful about design, realistic about commitments, and consider an appropriate governance structure that effectively enables the objectives of coordination.
 - Limit coordination model to fewer organizations that are like minded and have similar approaches to cash delivery.
 - Conduct a capacity assessment to determine various roles or technical leads, and have clear ToRs for engagement.
 - Quality assurance should be predicated on a minimum standards approach with aligned JDs, and skill sets.
 - There should be a continuity of people engaged and/or some duplication so that with turnover, memory and continuity are not lost
 - Where possible, avoid bilateral agreements, which can cause disharmony.
- Whatever approach is taken forward, it is imperative that organizations learn from each other in a systematic way and have a safe space to unpack technical difficulties and have the support of the GoG to allow them to scale and try out new approaches.
- NGOs bring a diverse range of expertise and experience. These should be leveraged systematically.
- Beneficiaries are overwhelmingly grateful to the Greek government, NGOs and donors for the financial assistance they are receiving.

REFERENCES

- CALP's Multipurpose Cash Grants (MPGs) guidelines, "MEB guidelines calculation for CWG." June 2016.
- Catholic Relief Services and Caritas, "Analysis of Post-Distribution Monitoring, Cash Transfer Program – MPGs," Athens, Greece. October 2016.
- CWG, "Recommended Minimum Expenditure Basket (MPGs)," June 2016.
- ECHO, "Greece: Refugee Crisis Humanitarian Response Factsheet," September 2016
- Greece Cash Working Group Minutes, March 16th, March 23rd, May 9th, September 15th 2016
- Human Rights Watch, "Why are you keeping me here? Unaccompanied children detained in Greece." September 2016.
- Iraq Cash Consortium Fact Sheet, April 2015.
- Interagency Food Cell Assessment: Food and Cash Response Preferences and feasibilities in formal sites in Greece, July 2016.
- International Rescue Committee, "The IRC in Greece Factsheet," July 2016; "ERD - FAQ Athens," October 2016; "Internal Finance Analysis," September 2016; "An Overview of IRC Cash Provision Assistance in Greece," [DATE].
- International Organization for Migration, "Europe – Mediterranean Migration Response: Movement trends and numbers." February 2016.
- IRC's lessons learned documents: Strengths and challenges with mapping, registration, verification and distribution in Schisto; Single women reduction feedback; and after action review – action points. Kweyu, Betty, "Lessons Learnt from A Consortium approach – cash transfers in South Central Somalia," January 2013.
- Lebanon Cash Consortium, "What's behind the consortium, staff experiences," [DATE].
- Mercy Corps, "Post Distribution Evaluation in Lesvos: A qualitative assessment," December 2016.
- NGO's and Humanitarian Reform Project, "The participation of NGOs in Cluster Co-Leadership at country-level: A review of experience. February 2010.
- Platzmann, Maren and Katastrophenhilfe, "Cash Transfer Programming: Feasibility and Appropriateness in the context of IOCC's humanitarian response to the refugee and migrants' crisis in Greece [Kos and Chios Island]." Commissioned by International Orthodox Christian Charities. November 2015.
- Saliba, Samer, "Learning from Lesbos: Lessons from the IRC's early emergency response in the urban area of Lesbos between September 2015 and March 2016," November 2016.
- Somalia Cash Consortium, "A Cash Study of the Consortium Transfer Program in Somalia," 2012.
- UNHCR, "Europe Refugee Emergency, site map of capacity and occupancy," 25 November 2016; "Greece: Accommodation for Relocation Project Factsheet," October 2016; "RFP Bidder's Conference," Sept 2016.



ΕΘΕΛΟΝΤΗΣ - VOLUNTEER

IFRC registration at Softex in Northern Greece by Poul Henning Nielsen

ANNEX A: LIST OF KEY INFORMANTS INTERVIEWED

Akmal Shah	Iraq ERD Coordinator, International Rescue Committee, Iraq
Aleksandra Balandina	Humanitarian Officer, International Rescue Committee, Greece
Alex Athanasiadis	Athens Field Officer, Caritas
Giovanni Lepri	Deputy Representative in Greece, United Nations High Commissioner for Refugees (UNHCR)
Gareth Bailey	Supply Chain Coordinator, International Rescue Committee, Greece
Gioni Lumezi	Project Manager, Catholic Relief Services, CRS
Jackie McLeod	Emergency Response Team ERD Coordinator, International Rescue Committee, Global
Jane Waite	Deputy Director of Programs, International Rescue Committee, Greece
Jarrett Basedow	ERD Coordinator, International Rescue Committee, Lebanon
Kaja Wislinksa	Program Manager Mainland, Mercy Corps, Greece
Kamran Ahmed	Interim Finance Manager, Mercy Corps, Greece and Balkans,
Kevin Murphy	ERD Senior Cash Manager, International Rescue Committee, Lebanon
Lucia Steinberg Cantarero	ERD Coordinator, International Rescue Committee, Greece
Massimiliano Benevelli	Head of Programs, Danish Refugee Council, Greece
Muhammad Ahmad	Finance Controller, International Rescue Committee, Greece
Rachid Moujaes	Cash Advisor, Danish Refugee Council, Greece
Rami Beirkdar	Cash working group co-chair, Catholic Relief Services, Greece
Richard Ross	Senior Cash Manager, International Rescue Committee, Greece
Sally Morson	Disaster Assistance Response Team (DART) Area Coordinator, Samaritan's Purse, Greece
Thomas Byrnes	Cash Delegate, International Federation of Red Cross and Red Crescent Societies (IFRC), Greece
Valentina Linoci	Cash Transferring Coordinator, Mercy Corps, Greece
Vladimir Jovanovic	ERD MEAL Manager, International Rescue Committee, Iraq

ANNEX B: SURVEY RESULTS

Cash Consortium of Greece - Preliminary Research Data		Implementers				Planners			
Implementers	Planners	IRC	Mercy Corps	IFRC	CRS/ Caritas	DRC	Samaritan's Purse	CARE*	UNHCR
Total staff (not just for cash)	Total staff (not just for cash)	370	45	50 - 600 (partners teams)	220				
What is the total number of individuals benefiting from your organization's cash assistance programming?	What is the total number of individuals benefiting from your organization's cash assistance programming?	1963	9530	450	5700	N/A	N/A	N/A	
What is the breakdown of your total caseload, total numbers of:	What is the breakdown of your total caseload, total numbers of:				Respondent skipped this question				
a. HHs	a. HHs	439	1740	179		N/A	N/A	N/A	
b. Single men	b. Single men	186	2892 /Not disaggregated	44		N/A	N/A	N/A	
c. Single women	c. Single women	27		18		N/A	N/A	N/A	
d. UAM	d. UAM	0	350	0	N/A	N/A	N/A		
This data is as of what month in 2016?	This data is as of what month in 2016?	End of Sept	May to Oct 2016	November	August	N/A	N/A	N/A	
What is your monthly average for new cases over the last three or several months?	What do you expect will be the monthly average for new cases (total of HH, single wo/men, UAM) over the first several months of 2017?	40	2000	50	100	100	majority of program on Islands, depends on new arrivals	Awaiting confirmation from squats	
In your plans for early 2017, what is the total number of individuals you expect to reach with cash assistance programming?	In your plans for early 2017, what is the total number of individuals you expect to reach with cash assistance programming?	6,200	12,000	5,500	8,000	8,517	3,500	3,480	
Current Sites	Planned sites	Attica: Eleonas I,II,III	20 Attica, Lesbos, Epirus, Leros, Kos		Attica: Elliniko I,II, III; Skaramagas				
Have any of the following assessments been conducted as part of your organization's cash for basic needs programming in Greece?	Are you planning on carrying/ or have you already carried out any of the following assessments as part of your organization's cash for basic needs programming in Greece?				Respondent skipped this question				
a. Cash feasibility	a. Cash feasibility		X	X			X		
b. Markets	b. Markets		X			X			

c. Needs	c. Needs						X		
d. Security	d. Security	X		X					
e. Baseline	e. Baseline		X				X		
f. Other, please specify	f. Other, please specify	Site assessments				Service Provider			Accommodation/squats, people sheltered for specific vulnerabilities.
Cash transfers	Cash transfers								
a. What is the value your cash transfers?	a. What will be the value your cash transfers?	90+50+50+50+50+20+20 (between 90 and 330 Euros)	90 (for individuals) + 50 + 50 (family members)	90+50+50+50+50+20+20 (between 90 and 330 Euros)	90 for single; 290 for families up to 4; 330 for families up to 7	90+50+50+50+50+20+20 (between 90 and 330 Euros)	Waiting on new MEB analysis		CWG amounts
b. What is the frequency of your cash transfers?	b. What will be the frequency of your cash transfers?	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly
c. What is the duration of your cash transfers?	c. What will be the duration of your cash transfers?	6	two months, waiting for additional funds	5 months	two months so far with intention to continue	Until grant funding ends	Funding through March 2017 with the hope to extend through the end of 2017.		Until grant funding ends (projected to be the end of March 2017)
d. Is the value/frequency/duration of cash transfers uniform across sites? (Y/N)	d. Will the value/frequency/duration of cash transfers be uniform across sites? (Y/N)	N	N	Y	N	Y	Maybe	Y	
When do you do distributions?	When do you expect to conduct distributions? Beginning/middle/end of the month?	End of month	It depends on the locations	Varies based on site	Middle	Before end of month, loading of the cards 1st day of the month	End of month	TBD	
How do you conduct distributions?	How will you conduct distributions?								
a. House to house	a. House to house	X	X				X	X	
b. Distribution points	b. Distribution points		X	X			X	X	
c. Other, please specify	c. Other, please specify		Camps and Shelters		Different modalities are used in different camps.	per site until we decide to move to Urban context, then it will			

							be house to house		
What delivery mechanism do you use for cash transfers? (Select all that apply)	What delivery mechanism do you plan to use for cash transfers in Greece? (Select all that apply)								
a. Cash in envelope	a. Cash in envelope								
b. Prepaid cards (ATM/POS)	b. Prepaid cards (ATM/POS)	X	X	X	X	X	X	X	X
c. Mobile money transfers	c. Mobile money transfers								
d. Remittance/ Hawala	d. Remittance/ Hawala								
e. Vouchers (paper or electronic)	e. Vouchers (paper or electronic)								
f. Other, please specify	f. Other, please specify		Gift cards and Shopping day						
If delivering cash assistance digitally, what fees do you incur per transaction?		Set up fees (\$2500), card issue fees (\$5), card load fee (\$2), bulk order fee (25\$), card design fee (\$1,000), expedite fee (\$2,5 per card + \$20 FedEx charge)	1,35% / transfer (MasterCard) and 4% / transfer (Segovia)	ATM fees, balance check fee, card error fee	ATM transaction fees, per-card fees when requesting, monthly fees				
What are the fees incurred by beneficiaries per transaction?		International purchase transaction (2%), international ATM fee (\$4,95/transaction), cardholder re-issue fee (\$5), ATM inquiry/decline fee (\$0.75)	3,75 euros per each withdrawal	None	CRS covers transaction fees to the financial service provider, so there are no fees. There are some rare cases when banks' ATM charge a fee.				
Does your organization cover these transaction fees? (Y/N)	If planning to deliver cash assistance digitally, does your organization plan to cover transaction costs incurred by beneficiaries (i.e when using prepaid cards at ATMs/ POS)?	N	N	Respondent skipped question	Y	Y	Y	Respondent skipped this question	
What are the KYC requirements for the FSP you are using? (Select all that apply)	If planning to work with a particular Financial Service Provider (FSP), what are the KYC requirements for this FSP? (Select all that apply)								

a. Full name	a. Full name	X	X	X				
b. Address	b. Address	X	X					
c. Date of birth	c. Date of birth	X	X	X				
d. Place of birth	d. Place of birth							
e. ID # (Registration, etc.)	e. ID # (Registration, etc.)		X					
f. Other, please specify	f. Other, please specify		Segovia ID - link between Segovia and MasterCard		none of the above is explicit requirement	We didn't select the provider yet, so we don't know the requirements	currently KYC requirements are put on the organization	
As standard practice, do you conduct PDMs? (Y/N)	As standard practice, do you conduct PDMs? (Y/N)	Y		Y	Y	Y	Y	Y
What type of questions do you ask in your PDM questionnaires? (Select all that apply)	What type of questions do you ask in your PDM questionnaires? (Select all that apply)		Y					
a. Factual questions to confirm that program was delivered as intended	a. Factual questions to confirm that program was delivered as intended	X		X	X	X	X	X
b. User-experience (i.e. relevance of service to beneficiaries to meet needs; satisfaction with organization's service delivery & engagement with clients; satisfaction with targeting/selection process)	b. User-experience (i.e. relevance of service to beneficiaries to meet needs; satisfaction with organization's service delivery & engagement with clients; satisfaction with targeting/selection process)	X	X	X	X	X	X	X
c. Experience with payment process (accessibility, safety/security, fraud)	c. Experience with payment process (accessibility, safety/security, fraud)	X	X	X	X	X	X	X
d. Beneficiary spending and decision making	d. Beneficiary spending and decision making	X	X	X	X	X	X	X
e. Other, please specify	e. Other, please specify							
Will you be able to share de-identified data (data with all beneficiary ID columns deleted)? (Y/N) If no, please explain	Will you be able to share de-identified data (data with all beneficiary ID columns deleted)? (Y/N) If no, please explain	Y	Y	Y	Not Sure	Y	Y	Y

ANNEX C: FOCUS GROUP DISCUSSION BREAKDOWN, SCRIPT AND QUESTIONNAIRE

Breakdown of Participants	Total / Average	Kara Tepe	Eleonas/	IRC
		Mercy Corps beneficiaries	beneficiaries	
Participants	80	33	47	
Gender				
Male	31	14	17	
Female	49	19	30	
Language				
Arabic	42	18	24	
Farsi	38	15	23	
Country of Origin				
Syria	36	14	22	
Iraq	6	3	3	
Afghanistan	31	15	16	
Iran	5	0	5	
Lebanon	2	2	0	
Average # of months	6.25	3.7	8.8	
Average HH size	4.5	4.8	4.2	
Average age	34.1	35.6	32.6	

Structure: Speak with up to 10 individuals per group divided by language group and gender, comprising single men, single women, family card holders, and family non-card holders.

Welcome: Thank you for participating in this focus group. My name is Neetu Mahil. I am conducting research on *how* cash assistance is going here at this site for you. We plan to be here for an hour, but can go over if the conversation requires more time. We want to discuss your experience with cash assistance, and want to talk very openly about this. There are no staff who are involved in your cash assistance present here. Additionally, we have not taken any identifying information from you, so you can speak anonymously and honestly. While we appreciate your feedback, ideas and thoughts, I cannot promise that any action will directly result from this discussion. The purpose of this discussion is only to understand what the NGO responsible for your cash assistance is doing well and how they might improve as they move forward.

Demographic information form

- 1 Focus group participation number
- 2 Single or Family (card or non-cardholder)
- 3 Gender
- 4 Age

- 5 Nationality
- 6 Length of time in Greece
- 7 Status (pre/registration/etc.)
- 8 Profession/ Education level
- 9 Number of people in your household

FGD Questions

Ease of accessing cash assistance/ preferences

- 1 How easy/ difficult is it to access cash from the ATM or purchase things at the store using the card?
Some additional guiding questions below.
 - i. How do you access the ATM/ point of sale?
 - ii. How far is the ATM/ point of sale from your house? How long does it take you to reach POS/ ATM from your house? (in mins)
 - iii. What mode of transportation did you use to travel to the POS/ATM? (foot, bicycle, bus, car, other - specify)
- 2 Did you receive the money the first time you went to the ATM or tried to use the card at a POS? If not, why were you unable to get the money in your first attempt? Card didn't work, POS didn't work, didn't know how to use the card, retailer refused to use card at POS, lost PIN/ ID card, other issues?
- 3 What kinds of expenses, if any, do you incur when you collect money/ or used the POS?
 - i. (Transportation, fees to obtain cash at ATM, or at POS, payment to NGO staff, or community/ influential person, other?)
- 4 Have any of you experienced any conflicts, disagreements, or security issues when retrieving cash or buying items from the store? If yes, can you describe what happened?
- 5 Do you like receiving assistance on the card?
 - i. If not or somewhat, what aspect of receiving the assistance on the card was not satisfactory?
 - ii. What would you change?
 - iii. Do you prefer a different method of assistance?

Access to markets

- 6 Can you find everything you need in the markets?
- 7 How far are markets? Is it easy/difficult to bring back things from the markets?
- 8 Are the prices in the market reasonable?
- 9 Do you have any difficulty making purchases? *Barriers could include language, discrimination, not knowing where to go, etc.*

Transfer value and purpose

- 10 What do you use the cash assistance for?
- 11 Is what you receive on the card adequate to your/ your family's needs?
- 12 What needs do you have that cannot be met with the cash assistance?
- 13 How are you meeting those additional needs?

Dynamics – 15-18 only for household groups

- 14 Are there any conflicts/disputes at this site related to cash assistance? What were/are those issues?
- 15 Have the relationships in your household changed at all because of this program? Have they gotten better or worse? If so, how exactly?

- 16 Which member of the household makes decisions on how to spend the cash assistance?
- 17 Are there any disagreements between household members on how to use the cash assistance? If so, what are those disagreements about exactly and in the end who made the final decision on how to spend the money?
- 18 Are there issues with whose name is on the card, what are those issues?

Relations with host community/ Greeks

- 19 Are you experiencing any issues with the host community/ Greeks because of cash assistance specifically?

NGO Communications

- 20 How well has the NGO communicates about the amounts you would receive, the process for receiving cards (registration, verification, distribution, top-ups, etc.), expectations for you to be in your shelter, timelines for all of the steps, how to use the cards, when to use them, how to make complaints, how to get to ATMs, markets, what to do in case of a problem, etc.?

Complaints

- 21 Have you made any complaints using the NGO's complaint mechanism? How was the experience? Was your complaint resolved? Was there any follow-up?

Open-ended

- 22 How can the program be improved?

ANNEX D: DETAILED FINDINGS

Accessing permissions to sites

With the closure of the Balkan Route in March 2016, it became clear those refugees already in Greece would largely remain, and so the GoG began setting up semi-permanent sites across the Mainland and in the North of Greece. The majority of these sites—along with the transit sites on the Islands which were converted into more permanent settlements—are managed by the Military, either army or navy, while a few are managed by municipalities. Site managers are responsible for managing the inflow of refugees and granting appropriate access and support for implementing NGOs to provide services such as shelter, water, sanitation, hygiene, health, protection, cash assistance services to site populations. Site managers also ensure the safety of their respective sites and have been responsible for providing meals.

Due to the organic manner in which many of these sites were established, no official process was in place for NGOs to gain access to site populations to provide services until roughly the summer of 2016. Site managers would generally grant access informally and verbally and NGOs would commence programming. Wanting a more coordinated and accountable approach to service delivery, since mid-2016, the GoG has looked to establish a more robust and methodical system for accessing sites.

With respect to cash programming, MoMP's process for accessing sites involves an official request from the NGO in writing for permission to access a new site along with documents explaining an organization's phase by phase activity plan with timeframes and activity results from other successful implementations of

the activity in other sites. Key informants have mentioned being required to include an organization's methodology and approach, lessons learned from other sites, previous experience in cash, programming dates, value of transfers, communication materials, and beneficiary lists.

Once permission to access a site is granted, the implementing agency is required to submit renewal requests on a monthly basis providing key documents and information on implementation including beneficiary information disaggregated by gender, nationality, household size, and amounts transferred, as well as activity feedback with best practices and challenges encountered during implementation. The MoMP has a taskforce of staff who handle requests for accessing to sites for cash programming as well as reviewing monthly renewal requests.

While the MoMP uses this 'access to sites' process to more systematically understand and track what services are being provided and by whom as well as whether these services are meeting the needs of the populations across sites, this process can be very time consuming for NGOs and result in delayed programming. The MoMP has been strict about coordinating further roll-out until a coordinated approach, messaging and coverage have been agreed, to avoid the challenges that existed during the unstructured roll-out in Attica. While the speed of facilitating roll-out has been frustrating, it is important to also recognize the challenges that were created by un-harmonized approaches at the outset of cash programming.

Significantly, access to sites is granted at the activity level and not the program level. This means that for every program activity across a cash project cycle, an agency must get explicit approval from site management. This is causing delays in carrying out registration, verification, distribution, PDMs, and follow-up, which is impacting the regularity by which beneficiaries receive assistance. A vast majority of FGD participants across sites identified intensified anxieties around not being able to predict top-ups. All said that they would prefer to receive top-ups at the exact same time each month to help them plan and stretch funds. In order to meet their programmatic objectives and consequently their humanitarian mandate, some organizations are resorting to workarounds such as sneaking staff in to sites to carry-out PDMs.

While MoMP set out to create an official systematic process for accessing sites, authorization for site access is still inconsistently granted and can depend on the personality of the person dealing with the request. MoMP is trying to improve their approach, but is also learning by doing.

For some organizations, the process has been harder than for others. For organizations struggling with meeting demands for access, they are seeing delays in the delivery of cash assistance by a month. While the MoMP works to better streamline the access to sites process, beneficiaries are missing an entire month of assistance, which is critical for them to avoid negative coping strategies. In one case where MoMP was unresponsive to a request for access and assistance was delayed, beneficiaries started rioting at a site. The riot created pressure on the Ministry to respond eventually, but put beneficiaries, NGO staff, and site management at significant risk. Additionally, the reputation of the implementing agency was jeopardized as beneficiaries hold them ultimately accountable for assistance and do not know the root causes for delays.

In terms of being successful in requests to access sites, the most significant factor is having a good and strong personal relationship with MoMP and the various site managers. Some of this rests on personal and language skills, but it also hinges on the reputation and history of the organization working in Greece. Organizations having little or no trouble accessing and renewing sites have either strong Greek language skills and staff capacity to complete requests and correspondence; have a dedicated staff member who has built up a strong relationship and trust with MoMP over repetitive encounters; or have a solid reputation through NFI/Food distributions or SMS (site management support). Mercy Corps has a dedicated staff member who does all direct liaison with MoMP to obtain authorization and renewals for sites. This staff

member has built a strong relationship with the MoMP while Mercy Corps has a good reputation for being reliable. For Mercy Corps as a result, all requested sites have been approved and renewals have been easy to obtain. Samaritan's Purse, which hasn't started up cash programming, has worked in smaller sites where relationships with camp managers have been easier to form. With a coordinator based in Attica who has a strong relationship with MoMP, Samaritan's Purse also hasn't had issues accessing sites thus far.

Finally, for others, the process itself has not been difficult as much as it has been time-consuming and takes away from other priorities. In addition to requiring a great deal of information on a regular basis, all correspondence for requests to MoMP must be conducted in Greek. This means that not only are organizations tasked with reporting more information than required by donors on a monthly basis to the government to continue implementing cash assistance, but must also resource translation from English to Greek and vice versa for all documents and correspondence with the Government each month for renewal.

NGOs are broadly experiencing a tension between the pressures they feel from the GoG to cover all sites quickly and these efforts are being hampered by the amount of information required to access sites across cash program activities. For agencies starting up cash assistance or taking on new sites, there is apprehension about what new challenges will exist in the future for accessing sites. There are concerns over delayed programming because of how time-consuming the process is and concerns over being able to scale effectively and efficiently.

Due to the fact that accessing sites isn't a consistent nor streamlined process, organizations are having varying degrees of success through bi-lateral requests and relationships with MoMP. This is resulting in MoMP being inundated with hundreds of requests from NGOs with their staff being overburdened, which in turn is leading to greater delays in humanitarian responses and program delivery. In addition to hiring more taskforce staff to work on requests, MoMP should consider granting access to sites to NGOs by program instead of by activity. As MoMP improves the process, there will be significant efficiency gains in consolidating requests and centralizing the role of government liaison across NGOs. This will free up technical staff to spend more of their time and efforts on implementation.

Relationships with MoMP and site managers are crucial to efficient programming. In IRC's experience, while relationships with site managers have been generally smooth, they have also been time consuming to maintain. Similarly, since Mercy Corps delivers cash across a great deal of sites, they have also found nurturing relationships across site managers time-consuming. Due to their significant NFI and emergency food distributions, Samaritan's Purse has also been able to form strong direct relationships with site managers, albeit at smaller sites, where building relationships is easier according to Sally Morson of SP. For CRS/ Caritas, the quality of relationships with site managers can also depend on the level of the staff. At a site managed by the Navy for example, there can be two distinct levels that may not agree on a particular activity or action. This can result in high-level approval with little support from lower level staff, who can present obstacles such as not providing water for staff.

Some organizations, such as the IRC, have staff who have very strong professional relationships with key MoMP and MoL staff. This facilitates access to sites, a more frequent audience with MoMP and access to MoL staff who are planning for the expansion of the social safety net. While this clearly has benefits at the policy and strategic levels, staff turnover can be a set-back for an organization which may have to start building relationships anew. Mercy Corps also enjoys strong relationships with MoMP based on trust and reputation. SP stepped in to deliver emergency food assistance when several sites were struggling, and this was well respected within MoMP, who has specifically requested SP to deliver cash assistance. SP is looking to hire more people going forward to manage the work associated with accessing new sites and the monthly renewal process. While IFRC is just starting up cash programming, their experience so far has been

that “person to person communication is as important in Greece as it is in the Middle East, where close high-level relationships are required to get things done quickly and smoothly.”¹⁹

Managing inflow and outflow of refugees from sites

The inflow of refugees refers to their acceptance to live at a particular site, whereas outflow refers to their permanent departure from a site to live elsewhere.

Since the closing of the borders in March 2016, the GoG has required blanket coverage of beneficiaries. This means that while organizations do not spend time on vulnerability criteria and eligibility scores, they spend a great deal of time on registration and verification, since the only requirement to receive assistance is residence in a particular site and some kind of “official” document from the government or police noting status within Greece’s official asylum registration process.

Due to the fact that there is no country-wide system in place for tracking beneficiaries, and site management do not consistently track the flow of beneficiaries, NGOs face tremendous pressure in determining who still lives at a particular site each month to prevent both inclusion and exclusion error.

Sites across Greece vary in terms of how restricted they are to individuals entering or leaving the site. In Schisto and at Kara Tepe, one must sign-in before entering the site, while in Eleonas, one can walk in and out without identification or signing-in. Some sites like Schisto, also provide a residency number, which helps agencies confirm residence. For sites like Moria on the Islands, managing inclusion and exclusion error is extremely difficult and Mercy Corps doesn’t have an accurate list of people living at the site. The site is overcrowded, so some individuals live outside the site, but return to access cash assistance.

Although residency numbers are clearly helpful to NGOs, there is a persistent practice of only documenting inflow and not outflow. When either families move from a site or when a family member leaves for Europe, there is often not updated documentation available. Some who have this number do not still live at the site. This could be because they have been relocated, but are coming back for cash assistance, or because of a flaw in the administration of the Schisto number. Sites generally do not track outflow because it is difficult to keep track of those moving from sites, but also because there have been incentives for each site to keep their numbers high since funding for food assistance has been predicated on the size of each site. This incentive will naturally be reduced once food distributions end December 31st 2016.

Thus the main method organizations use to manage the flow of refugees involves arduous and imperfect registration and verification processes. As NGOs work to determine actual residence, the absence of outflow management is also resulting in tensions among those who actually live at the site, saying “we endured the summer here, and these people came only to get the money” or “we are going to burn the tents of these newcomers.”²⁰ There is also widespread perception that those not entitled to receive cash assistance are taking funds away from those who are. There is a false belief that those who are actually living at a site could get more if those who are not stop receiving assistance. While this perception must be dispelled through effective communication about how the transfer values are set, NGOs need support in mitigating inclusion error and/ or double dipping.

While Schisto’s number system is more advanced than other sites that don’t have such a system for inflow, this system must be improved to account for outflow. Those who no longer live at a site must be somehow accounted for. While NGOs through their tent/shelter registration can provide Intel on empty tents that do not look occupied, site managers must bear responsibility for updating resident lists. Site managers require support for this, but NGOs alone cannot provide this support. This is a potential role for UNHCR.

¹⁹ Thomas Byrnes, IFRC Cash Delegate, Greece

²⁰ IRC Schisto Lessons Learned Report

Finally, NGOs are also spending a good deal of time mapping shelters and tents as the maps provided by site management can vary in accuracy. Organizations like the IRC have created their own maps and numbering systems, which is helpful for IRC staff as they go by tent/shelter, but difficult when beneficiaries come to office hours or approach IRC staff.

Beneficiary registration (Process, documentation, definitions, and data management)

NGO registration of beneficiaries is required to deliver cash assistance, and individuals who are not registered are not eligible for cash assistance. Yet NGOs are struggling with competing constraints during the registration process. While on the one hand NGOs have a humanitarian imperative to deliver cash assistance to refugees living at sites, they must also ensure that they are not providing assistance to those who are not eligible or who are receiving assistance elsewhere. They must also determine family size, which has implications for the amount of cash assistance beneficiaries receive.

In the absence of a full population census for each site to confirm family sizes, NGOs generally conduct the registration of residents door to door. This is done at the beginning of a cash program and for new arrivals throughout a program. For the IRC registration generally takes about one week, but can take longer if not all residents are present in their place of accommodation at the times registration occurs. As part of IRC's cash programming process, all cash beneficiaries need to be registered in-person in their shelters in order to receive assistance. The entire family must be physically present at the time of registration and have their proof of identity document to be registered. While this approach limits inclusion error, there are cases of exclusion as family members might not be able to be physically present at the time of registration. Additionally, there is a strain on families to stay in their shelters for the greater part of a day during the days during registration since staff do not tell residents ahead of time when they will be by. There are additional concerns about staff safety, especially for programming in the North where beneficiaries reside in warehouses with few exits. There are concerns that those who do not have proper registration documents may become upset at being excluded from cash assistance. Finally, this process is very labor intensive.

For other organizations who have fewer staff than the IRC, registration and verification occurs at a single point at a site, where individuals arrive at allotted times with their documents. While this is a much more efficient and scalable approach and likely limits exclusion error, it does pose the risk of significant inclusion error as through this method it is difficult to determine whether someone is an actual resident of the site and thus receiving assistance elsewhere.

Documents for proof of identify

NGOs across the board are struggling with documentation, which is a core element in registration. Documents used by NGOs as proof of identity include official registration and pre-registration documents, police notes, medical notes, or case numbers.

While the majority of NGOs on the mainland only accept pre-registration or registration documents, NGOs operating on the Islands are compelled by humanitarian obligations to accept any kind of "official" document since it can take a month or more after receiving a police note to obtain registration documents. The police note, which confirms that a person has arrived in Greece and is seeking asylum, starts the clock for 24-27 days to obtain registration.

Due to delays in getting people registered, the GoG instituted an additional step in the registration process in May 2016 called pre-registration, which allowed asylum-seekers to live in Greece until their applications were processed. Pre-registrations took place in designated centers, starting with people living in official camps, then people from "informal sites," or open camps, then finally to the pre-registration centers, but only "if people were willing to move to an official site," which could take months. Lastly, people who found

accommodations in hotels or other residential places, were allowed to pre-register, but applicants with expired police notes could pre-register only through Skype. Finally this process was only open to people who entered Greece between Jan. 1, 2015 and March 20, 2016, and who held a police note acknowledging their presence in Greece and living on the mainland; people on the islands could never apply for asylum this way.

Once asylum-seekers completed pre-registration, they were required to get an appointment at the Asylum Service office and sit for an interview to explain why they need asylum. Once the Skype call was completed, the applicant could get a code and a date to pre-register in person at the Asylum Service Office of his/her choice (Athens, Thessaloniki, Alexandroupolis or Rhodes). The date for pre-registration was usually scheduled within five days from the Skype call.

There have been serious issues with this pre-registration process. Refugees have consistently raised complaints about calling the Asylum office via Skype without answer. People like Khalil Mohammed, a Syrian refugee in Greece, even “resorted to hunger strikes because they are unable to start their asylum claims due to an under-resourced the video interview system that has let down thousands.” Additionally, people needed cellphone access, as notifications about next steps are communicated via SMS. Even after all of these conditions were satisfied, the path to asylum has still long and complicated.

While the GoG works to get people registered, NGOs have been compelled to accept police note and in some cases medical notes if there is a newborn without a police note or in places like Kos where fewer than half of those at the site have even police notes. There have been serious challenges with accepting police notes. They are easily falsifiable and since police departments issue notes without a central database of entries, people can obtain more than one, re-setting their clock on registration. Further, anyone can obtain a police note, limiting their utility in cash assistance programming. Finally, there is also the issue that not all donors will accept a police note as sufficient proof of identity and eligibility.

At Moria where there are no lists of residents and due to overcrowding, some individuals live outside the site, but return to access cash assistance, Mercy corps does registration for people not living in the site, but who have any kind of paper stating that they do.

While the issue of documentation is less complicated on the mainland as people usually have undergone pre-registration or registration, there are challenges even with those who are officially registered. Registrations done through skype don't always have an official document. Additionally, registration processes do not capture family connections or ties, leaving it to aid agencies to determine family sizes and relationships. Samaritan's Purse has conducted family mapping for NFI distributions and will do the same at each new site during beneficiary registration, and then cross-reference ahead of distributions.

Mercy Corps, along with UNHCR, CARE, and others, provides assistance in shelters for families with children who have been relocated out of troublesome camps. According to Mercy Corps, while organizations responsible for relocation generally provide resident lists, they are not always accurate. Mercy Corps will therefore cross check lists through visualization for registration. Mercy Corps admits that it is likely in the end that there is some inclusion error and some individuals will receive cash assistance who shouldn't. While Mercy Corps accepts a level of inclusion error, it makes planning cash flow based on estimates of beneficiary numbers more difficult for future months. This is a significant issue on the Islands. Mercy Corps uses Segovia to flag two top-ups to the same person, but sometimes there are people with two registrations because they can get multiple police notes and then pre-registrations, and these documents are not connected to each other.

While both IRC and IFRC accept pre-registration and registration documents, they prioritize inclusion and exclusion errors differently and have different approaches to registration. For IFRC, the main concern is to

complete registrations quickly, using I-Form to capture photos of documents and signatures on tablets. For IRC inclusion error is a major concern and IRC staff spend a great deal of time determining residence and family size door to door.

CRS/ Caritas is concerned about exclusion error and accepts any kind of official document. In a small number of cases, if a person has no documents CRS/Caritas staff will confirm residence with camp management. According to Alex at Caritas “NGOs will make mistakes but prefer that our mistakes favor the beneficiary.”

Finally, instead of being able to rely on standardized official documents, which do not denote family structure and size, determining family size accurately usually involves a conversation between NGO staff and beneficiaries, which takes significant time and capacity. Additionally, when a family moves to a site, they usually do so together, so the site management has the best sense of who is related. It is unfortunate that this information on family connections is not systematically documented and shared with NGO staff, as this would save a significant amount of time which could be better spent by NGO staff. If a family has introduced themselves as a couple during their police interviews where they receive police notes for example, it would be ideal for that information not to be lost as they move through registration process. Including camp management is a useful way of determining family structures since they know who is who more intimately and have a strong incentive in avoiding issues and complaints at the sites.

NGOs must continue to troubleshoot until Govt actually figures out how to effectively manage registration system.

Definition of a family/ Household

Another crucial aspect of registration is the definition of the family or household. This has implications on the registration process, the number of cards issued and the value of transfers, since cash assistance is provided at the household level and in the form of family cards. While there has been variance on the definition of a family, there has been progress toward harmonizing this definition via the cash working group.

In the past CRS/Caritas defined a family as mother and/or father and child, essentially defining a family by children under the age of 18. A family received a family card with 290 euros per month, but a couple without children were instead given two cards at 90 euros per month each.

While Mercy Corps defined a family as mother, father, and children of all ages (not including grandparents), this definition was not working for the NGO. Mercy Corps believed that adult children should be separated as they have distinct needs, and had planned do financial literacy trainings with them as cash was provided.

SP said that they would follow the direction of the CWG, but didn't want to ask staff to be in a position to discern who was married and who is not. SP will defer to camp management, but in smaller camps, it's much easier to do this. In these smaller camps, it's straightforward to go tent to tent, but in larger shelters, which SP hasn't yet tackled, it will likely be harder. DRC would define a family as it does with respect to food distribution, essentially defining a family as those who live together with one card for a single family.

GoG should be mapping family structure information, for themselves and for NGOs, but NGOs can help to corroborate family lists. This is an opportunity for mutually beneficial collaboration.

Data Management

A final important aspect of the registration process involves how agencies collect and manage registration information. All NGOs are either collecting or aim to collect registration information digitally. This is a requirement in order to upload beneficiary information into payment platforms in order to initiate the payment process.

NGOs are using either KOBO, Commcare, or I-Form (an online cloud database) as data collection products, and generally use either excel or ODK on the backend. Some organizations have integrated systems for registration, complaints, and PDMs.

The IRC has been using KOBO, but migrating to Commcare to better conduct follow-ups, manage verification and top-ups, and focus on individual indicators. DRC plans to use a similar process to other cash consortia in Lebanon and Iraq, using ONA/ KOBO, but is using excel right now. SP does digital data collection through I-Form, but manages data through excel, and only has a single database manager for this. SP will be flexible and adjust to context. IFRC hasn't decided yet. They could use KOBO, and will definitely collect data digitally, but will likely use excel on the backend. IFRC has a separate system for PDMs, which is evolving. IFRC currently has a program manager to do this, but will hire additional people. Mercy Corps uses an ODK form via tablet to collect information which links to Segovia, where data can be analyzed and payment through MasterCard can be initiated. CRS/ Caritas uses I-Form extracted to excel with links to photos or docs and signatures.

Beneficiary verification

Verification of beneficiaries is required to establish whether beneficiaries still live at a particular and are consequently still eligible for cash assistance. Organizations are challenged during the verification process as families and/ or individuals move, either to other sites, are relocated through an urban program, or get smuggled out of the country.

All agencies conduct visual verification with cardholders before payments are made, whether for the first time or on a monthly basis. The verification process can take between a few days and two weeks depending on the size of a site, the number of NGO staff devoted to verification and the degree to which the verification is rigorous to eliminate inclusion error. For NGOs keen on mitigating inclusion error, verification is done door to door through in-person visual verification of all cardholders on record to make sure they still live at the site. It is also done in an unscheduled manner and not communicated to the residents in advance to limit the number of people who show up for verification, but do not live at a site permanently. If the cardholder is not present during the days or times of verification, they and their family is not be eligible for cash assistance for that month. Cards are deactivated if the cardholder is not present over months.

Despite rigorous verification processes, organizations are still being challenged as much with effective verification as with registration, as families and/ or individuals move, either to other sites, are relocated through an urban program, or get smuggled out of the country. There is anecdotal evidence of duplication and/ or double dipping, with beneficiaries raising that some families or individuals who do not live at a site show up for registration and verification and are receiving cards. For this extremely time intensive activity, which must be done on a monthly basis ahead of top-ups, there are likely still errors both in terms of inclusion and exclusion, and can delay beneficiaries receiving their monthly top-ups. In terms of exclusion, there are cases where families or individuals still live at a site, but are for a variety of reasons, real or fake, unable to be present during verification. Commonly cited reasons include hospital visits or attending church.

Further, verification is done only with cardholders, which frees up family members from remaining in their shelters, but eliminates the opportunity to manage outflow and adjust family sizes as some family members leave.

IFRC conducts visual verification in this laborious way, but was at time of this research, reconsidering this, especially in the North as some sites are warehouses which can have few exits, low light, and might be dangerous for staff to go cardholder by cardholder.

For IRC in Schisto, while the process itself has been smooth, staff encountered three challenges, namely, community dissatisfaction with newcomers receiving top-ups (exclusion error), lack of clarity on what kind of assistance minors would receive, and confusion for IRC staff with respect to the double mapping of the site.

CRS/ Caritas conduct verification door to door in Skaramagas, which takes on average 3-5 days for top-ups and for new comers. Since there are 3,500 individual at Skaramagas, it would be worthwhile to shadow CRS/Caritas to understand how they are able to efficiently cover so many individuals in so little time.

Distributions (HH by HH, distribution points etc.)

Once the list of registered and verified beneficiaries is completed, cards can be distributed. The person registered and verified as the cardholder is the only person who can sign and receive the card. This is generally scheduled to occur at the beginning of each month, but can take several days to complete, depending on the number of cards that need to be distributed. Cards are not loaded with value until cards are fully distributed, which is safer for staff. Beneficiaries who already have cards and received assistance in the prior month will have their top-up value added to their card.

Agencies vary in how they do distributions, dependent on how a site is set-up and managed, but also on whether distributions are used for more personal communication on cards. IRC for example delivers cards door to door and uses the opportunity to walk beneficiaries through how to use the cards at ATM machines and POS terminals, answering questions and addressing concerns.

For Mercy Corps, distributions depend on the site. In camps on the Islands, Mercy Corps work with site management and potentially the police to agree on a specific point for distribution. In Moria, Mercy Corps does distributions during weekend so they can get additional staff to support. Using distribution points, they will call people over time. In Karatepe however, Mercy Corps saw issues with the designated distribution point, which could be accessed from multiple entries. They instead delivered cards door to door in Kara Tepe, and had those who had missed the distribution come to their office in Mytilene between 8am – 5pm.

IFRC uses the WFP distribution approach, which includes setting up a distribution points, and controlling access by issuing token during the registration process which have a unique ID, and different colors and shapes to denote specific days and times for card pick-up. IFRC does exit point interviews for every 15 people and open to sharing the results of these exit interviews.

Samaritan's Purse uses a similar distribution point approach, but will remain flexible and defer to camp management. SP assigns beneficiaries days and times, and distributes through a distribution point over days. SP is flexible to change this approach based on learning from other implementers as well as on what camp management prefers. It's very similar for DRC, which plans to use distribution points at sites, but will remain flexible based on how best to do distributions.

Since NGOs are mainly basing their distribution approach on what makes sense at each site as well as what they want to add on to distribution, variation in distribution methods are to be expected and don't necessarily have to be harmonized. It is more important to ensure that distributions are done safely and NGOs are documenting and share their learning from distributions.

Process for monthly top-ups

On a monthly basis, once cardholders have been re-verified and newcomers have been registered and verified, monthly top-up amounts are entered into NGO's respective FSP digital payment platforms.

For NGO's generally, the process for top-ups can very time consuming, as it requires adding amounts to each card manually as top-up amounts vary from card to card depending on family size. Additionally, there can be errors during the reload process. It appears from KIIs that SWIFT and MasterCard/Segovia do not always understand the cause of specific issues, which can be very frustrating for NGO staff. Sometimes the database shows that a card has been reloaded, but this doesn't show up on the SWIFT payment platform. Sometimes cardholder names do not match. People missing who have been verified or people who are in the list don't have their cards reloaded. Since the issues themselves are varied and each requires different actions, the process is very time consuming and the time it takes to deliver top-ups is irregular from month to month.

Additionally, SWIFT's platform doesn't accurately link to IRC's database of current beneficiaries. IRC staff must download all beneficiaries from the beginning of the program without a mechanism for marking suspended cards that have been resolved. In some cases, a particular cardholder was not verified, they were away during the days and times field teams conducted verification, and so their cards are not loaded, but the NGO does not want to suspend the card since they may still live at the site. There can also be duplicate names in the beneficiary database. Moreover, there are complaints relating to cards not working. And finally, NGOs get requests to change the name of the cardholder for various reasons. Some involve protection concerns or that the cardholder has left for Europe but the family remains in Greece. Rectifying these issues can take a considerable amount of time. While the IRC had originally communicated to beneficiaries through materials that we could resolve issue within 5 days, in reality it can take an average of two weeks to resolve issues with cards and top-ups.

Mercy Corps also has had a lot of issues with respect to monthly top-ups. The Segovia platform is not very user friendly, and often the data doesn't match between Mercy Corps database, Segovia, and MasterCard's payment platform. When the context changes, it's difficult for the process to adjust. Top-ups are entered in manually and so take a lot of time. The Cash Coordinator/Advisor spends 70-80% of her time on resolving issues and making reloads. At core, there are issues with Segovia and MasterCard communicating effectively over time with each other. While both have API, it's not seamless, and can operationally challenging and the number of beneficiaries increases.

For NGOs who are able to bulk or batch upload, the process has been smoother and less time consuming. For example, CRS/ Caritas can do bulk uploads with beneficiary lists from their database linked from I-form. The program manager removes all unnecessary columns, and uses V-lookup to leave client number, first name is PPC and last name client # - linked to CRs/Caritas issues beneficiary ID number. I-form calculates the amounts of money automatically.

Assessments and Analysis

Very few assessments have been carried out and those that have been conducted are either no longer relevant or were small in scale, and have not been shared systematically.

There are variances in which assessments have been carried out by agencies. Instead of following the standard set of Cash Transfer assessments, NGOs have chosen to carry out those assessments deemed most critical. IRC has conducted site and security assessments, and plans to conduct market assessments in the North. IOCC carried out a cash feasibility assessment in November 2015, but limited it to the islands. Mercy Corps has carried out a baseline assessment on the mainland, cash feasibility, and a market assessment. There were some additional assessments for markets, but were tied to Winterization. There was a cash consultant analysis of cash feasibility in urban settlements. DRC will do a markets and delivery mechanism assessments, and has modified some existing assessments and will do quick and light assessments for some sites. SP has done some cash feasibility at sites, a needs and baseline assessment,

and plans to conduct their light-touch assessments for sites, which include checking access to markets, ATMS, distance and transportation.

IFRC hasn't done any yet, but plans to do a Rapid Market (RAM) eventually. According to IFRC, market assessments are least important right now as NGOs are not worried about markets' ability to replenish. According to Tom Byrnes, "we have not seen any shocks to the markets, likely because the caseload for beneficiaries is quite small. Additionally, we haven't really heard any horror stories since cash began in February. The one issue we have seen is on cash feasibility and delivery mechanism, NGOs moved to cards while a majority of beneficiaries has never used a card before. Those who are most vulnerable are difficult to train, especially without a lot of people taking the time them to show them. Communications materials generally lack pictures. Following-up and or resolving lost cards takes a great deal of time."

IFRC should be conducting a needs assessment now since the current MEB approach and transfer values are likely not meeting the needs, but they will need to conduct an assessment to know for sure. Since the original program and cash transfer values were designed not to meet basic needs, but rather provide enough for resilience as people traveled through Europe.

While IFRC would like to carry out a baseline assessment, they don't have the capacity. If IFRC did do this, they would do it at the registration stage. Questions would focus on food consumption score, reduced coping index (CSI). Ideally, they would want to see the Theories of Change (ToC) on reduction of coping and increase of food consumption score. Would like to do impact and process monitoring as well, lack the capacity and don't have CSI for this context. IFRC is more worried about exclusion than inclusion, despite the fact that donors want the latter.

Payment method

Everyone in Greece is using prepaid cards for cash assistance. Beneficiaries across IRC and Mercy Corps, which are urban preferred the card, which makes them feel safer, and generally liked having one card per family. There were only two individual exceptions to this, both elderly ladies who had trouble using the card.

There is variation in the time it takes to make payments and for beneficiaries to receive payments after verification depending on whether an FSP payment platform allows for bulk loading. NGOs who have to do top-ups manually spend a lot of time each month. There is variance also in how NGOs administer PINs. Some have cards with last 4-digits as the PIN, others spend time setting up PINs for each card and keep PINs in a database; some have the PIN included in the card envelope.

There are issues with beneficiaries trying to withdraw more money than is available. ATMs will just decline and even if PIN is entered wrong three times, sometimes the card is not taken. CRS/ Caritas can reset pin and unblock the card. When cards are lost and must be replaced for a five Euro charge, since access to sites can take time, people can wait for weeks to receive a new card.

Having the PIN as the last four digits of the card is a significant security risk for beneficiaries. Beneficiaries have shared through FGDs that this makes them feel that anyone can just take and use their cards, and so they always carry them. Once set, generally no one goes through the actions to change their PIN numbers.

Approach to Unaccompanied Minors (UAMs)

There is general consensus that assistance needs to be provided to UAMs in the way of assistance and that this approach should be harmonized. There is also general agreement from Cash Coordinators that NGOs should be providing cash assistance, either coupled with financial literacy trainings or restricting prepaid

cards potentially to POS only. Yet, there isn't a clear and harmonized approach as to whether to include UAMs or how to do so. While some organizations are providing a combination of gift cards, shopping days, in-kind assistance, or internet shopping, some organizations are waiting for the results of the CWG assessment to develop protocols for UAMs.

While Greek law allows for minors over the age of 14 to receive cash assistance, not all FSPs do. Agencies are working to determine if their FSP will allow this, but also waiting on results of SAVE protection assessment on pros/cons and risks for UAMs who receive cards.

For some agencies, like the IRC, there is confusion between approach to UAMs with cash assistance and information given to minors. This stems from UAMs receiving assistance in the past or rumors that they will receive it in the future. It's very challenging for staff who are at the front-line to communicate with minors about them not receiving any cash assistance. Staff are seeing cases where a minor will be 'adopted' by a family or a single man so that the "family" and possibly the minor will receive some amount. This presents great protection concerns.

Mercy Corps conducted focus group discussions with UAMs and based on those discussions decided to provide either gift cards or in-kind assistance, or participate in a shopping day. Mercy Corps cash team feels very strongly that UAMs should get cash, have conducted KIIs with UAMs in the North and in Kos, which showed that there are protection concerns with them not getting cash assistance. There is anecdotal evidence that UAMs sell gift cards for less value of the card for cash.

CRS/ Caritas also consulted FGDs with UAMs and decided to provide internet shopping in Elliniko. The choices for items included 1) phone, 2) shoes plus clothes, or 3) clothes. Every single UAM chose to receive a phone. CRS/Caritas has clearance from their FSP, Prepaid Financial Services, to provide cash to UAMs above 8 years old, but they are considering creative approaches such as providing only POS-enabled, or doing two transfers per month, 45 every two weeks. Either way, CRS/ Caritas will engage with protection actors for follow-up and monitor of spending. Under Greek law, should be able to move forward, but this motion is currently blocked by MoMP, which hasn't responded to requests.

IFRC is not providing anything to UAMs right now. Their FSP, Prepaid Financial Services, allows for it, but one obstacle is that IFRC doesn't have the capacity to do any case management, which may be required if cash is provided to UAMs. IFRC has ruled out taking UAMs to markets (shopping day), which is very time intensive. IFRC would strongly prefer to give cash. One way of doing it could be to only do it in camps where the Greek Red Cross is working. This still seems like a challenge since we'd need a lot of man hours and language skills. Regardless, below the age cut-off of 14, we'd still need to provide assistance to UAMs under 14, such as catering or commodity vouchers. For these reasons, don't know if cash is feasible for UAMs for protection and operational concerns.

Since DRC hasn't started yet, not sure of exact approach, but open to discussion. Protection should be involved regardless.

SP is has consulted camp managers and discussed potentially using assisted shoppers, but will also seek to understand what other actors are or will to do with respect to UAMs. SP's chosen provider allows for cards to UAMs, but SP wants to conduct more assessments to see what/ how other actors can collaborate.

Comparison of Financial Service Providers

It has been deemed that a card based intervention is more efficient and pertinent to the situation within Greece. The benefits of the prepaid card system are the access by users to a comprehensive list of vendors

that participate in the VISA/ MasterCard network. Vouchers are not a pliable option due to the operational demands that a large scale voucher program has on the organization.

Technical and financial requirements included in bid criteria

1. Experience with cash transfers – years plus projects of a similar nature
2. Detailed list of ATMs, card requirements, card/ account administration, customer services, proposed project set-up and start-up time, reporting modality, service operability, processing of uploads to POS cards, reporting of transactions and balances of cards
3. Composition of the team – project manager, project support

There is variance across implementing agencies in terms of which FSP is being used (SWIFT, MasterCard, Prepaid Financial Services (PFS)). IRC is using SWIFT Prepaid solutions; Mercy Corps MasterCard and Segovia; CRS/Caritas, IFRC are using Prepaid Financial Services (PFS); SP and UNCHR likely planning to use PFS as well.

In order to receive cards in country quickly, agencies such as IRC and Mercy Corps have leveraged global agreements negotiated at their respective HQ levels to determine FSP and negotiate fees. Initial tender processes were not able to include experiential factors such as time it takes to upload, load, activate, top-up, reconcile and report. FSPs generally promise a lot, but don't always know themselves what is involved in meeting humanitarian needs.

There is no one perfect FSP and scaling is proving difficult. While implementing organizations have conducted tender processes and chosen FSPs for specific reasons, each is undergoing degrees of customization and working with FSPs to identify and execute systemic solutions for glitches and issues with cards, the platform, etc. Thus, no one organization has the FSP solution yet that is ready for others to leverage. This variance across implementing agencies might be a good thing.

While there are numerous similarities between suppliers including on payment delivery with prepaid card on a Visa/ MasterCard network; individual and bulk loading of accounts; and financial compliance standards, each implementing agency is struggling with efficiently scaling up cash delivery in partnership with Financial Service Providers. There is no one perfect FSP and scaling is proving difficult across providers, whether due to the time it takes to upload, load, activate, top-up, reconcile, obtain the necessary reporting detail, fix glitches, etc.

Mercy Corps HQ has an existing global level partnership agreement with MasterCard, and costs for the Greek program were negotiated at HQ-level. Mercy Corps coupled Mastercard's cards and payment facilitation with Segovia's data management platform after an open tender for the latter. Mercy Corps has benefited from its long-standing relationship with MasterCard with a preferential fee structure. MasterCard, through its CSR, charges 1% on transaction, and there no charge for cards. Mercy Corps is using Segovia for the beneficiary management piece, and they charge 4% on all transactions. Mercy corps is delivering cash assistance to nearly 10,000 individuals cross 20 sites, but scaling for Mercy Corps with its FSP and data management provider is proving very difficult. Mercy is having a lot of issues between MC and Segovia that include glitches, weak link between MC and Segovia systems, invoice cycles, non-bulk management, especially for top-ups, lack of willingness to customize, non-user friendly platform, and is seeing issues increase in parallel with scaling. Mercy Corps is reconsidering their arrangement with Segovia/ MC.

The main issue appears to be with MasterCard, which provides very general customer service with no dedicated customer service person for Mercy Corps. Experience with Segovia has been good, but it takes time to make changes. The service provided by Segovia is not adapted to Mercy Corps' programming context. Mercy Corps is looking to revise its contract, or look into using another provider. Starting to

evaluate this at this time of this research study. On the technical side, activation, loading, reloading, and unloading is done card by card and cannot be done in batches.

In sum, while MasterCard provides a very good and competitive rate to Mercy Corps, their system is just not compatible. Oxfam, which is taking over some sites from Mercy Corps is looking at combing Segovia with Visa. Mercy Corps is interested in knowing how things are going with SWIFT and is looking to combine Segovia with another payment provider. The only concern about Segovia is that they have applied for the one card bid with UNHCR, and there are concerns that Segovia will allocate their internal resources toward the higher payer who requires or requests less of them in way of customization. Mercy Corps does not absorb fees and beneficiaries do not understand why they have less money than they think they should.

IRC launched an RFP to solicit competitive and sealed proposals to establish a contract over a period of one year (12 months) with one of more than one supplier with the possibility of one year renewal depending on supplier performance for the distribution of humanitarian financial assistance to refugees through an electronic payment delivery system. For the purpose of ensuring a reoccurring financial assistance intervention mechanism, not a one-off payment, as defined by ECHO objectives under results 3 activity 2, primary donor for this ERD intervention. Criteria based on reaching 15-20% or roughly 5K of the current numbers of refugees, at 55K or 10K households, as IRC cannot provide 100% coverage on its own due to operational considerations.

IRC chose SWIFT Prepaid Solutions based on a bid criteria which included lead time, meeting minimum specifications outlined in SoW, access, past experience and capacities, financial proposal cost, time to delivery, coverage, portal functionality, contracting in Greece, customer service, etc. Yet several months in, IRC is experiencing significant issues with SWIFT, as there has been inconsistent support from SWIFT to address systemic issues, customize in a timely manner, and issues with cards not working. Further while initial beneficiary lists can be uploaded in bulk, SWIFT platform does not allow for bulk activation or reloads. SWIFT is also quite expensive. At the time of contracting, there was little past experience to include in the bod analysis, with the exception of Red Rose and Segovia. Additionally, neither the FSP, partner, nor NGO across the board have a comprehensive and detailed understanding of what will be needed nor so it's difficult to determine capacities when evaluating a provider.

SWIFT's system requires manual activations and reloads or top-ups, which is time consuming and allows for human error. While SWIFT's system automatically generates reports, the timing for activation and reconciliation not in sync, which allows for fraud risks. Cards could be allocated to ghost beneficiaries. The amounts of money are quite significant and the burn rate is basically within a day, so mitigating fraud is a significant concern. Working with SWIFT to build in additional concerns into their platform has been slow. Finally interfacing with SWIFT at HQ level takes a lot of back and forth and time. If there are any mistakes or misunderstandings between the Greece Coordinator, IRC HQ and SWIFT account manager in Chicago on payments, changes, glitches, etc. fixing these can take time.

Additionally, a major issue in using SWIFT's USD-enabled cards is that their online system for beneficiaries shows amounts in dollars and not Euros, but withdrawals are in Euros. This is a significant reason for lost cards, as beneficiaries will attempt to take out more money than they have in Euros and the card will be eaten on the third attempt. SWIFT's fee structure is significant and since IRC does not absorb fees, beneficiaries are forced to the full burden of this fee structure.

IRC Greece has identified that their internal procurement process are too bureaucratic with the authorization thresholds for bid process being too low and thus requiring additional steps and approvals.

Supply Chain staff are struggling with a large portion (35%) of the total Greece budget coming through SC, and because of thresholds, has resulted in 20 tenders at the same time. This affects prioritization.

Looking to monetize all assistance, covering 35-50K people (all pre-registered), UNHCR has also followed an open RFP and ToR process, looking to provide 6-15K pre-paid cards with cash turnover of Euro 60 – 100 million per year, frame agreement aimed for two plus an additional year based on performance, all issued cards must have the ability for both ATM and POS, with geographic limitation to Greece only, monthly or bi-monthly transfers, and one-off recharges, UNHCR will be the main account holder, refugees will have sub-accounts, cards will be used by various funding entities (UNHCR partners); and funding entities should access services on the same terms as UNHCR, but have their own contract with the FSP. UNHCR – FIFO (first in and first out) – which means that a single card can have a single cash wallet, but 3 POS wallets. This will allow multiple implementers plus GoG to operate through a single card.

CRS, SP and IFRC followed an open tender process and all chose Prepaid Financial services, which the researcher heard the fewest complaints about, but PFS has also not been tested at scale. SP have used Red Rose in the past and have had issues with them. For IFRC only PSF tendered, and other FSPs didn't reply. PFS doesn't have API, which limits the potential to scale with this FSP in an efficient manner.

In terms of negotiating KYC and information gathering for KYC requirements, all FSPs with the exception of MasterCard have been quite flexible. PSF has very minimal requirements such as card number and amount, and for IRC, the KYC for Swift Prepaid Cards is not required, but rather suggested, in order to provide services and support to the registered user. In situations with protection concerns, the response team is required to decide to what extent the IRC will register KYC information to Swift.

Value of transfers

As cash assistance shifted to blanket assistance for those in Greece awaiting their asylum cases post March 2016, the GoG has required a harmonized approach to setting transfer values. The main driver has been reducing push and pull factors where disparities in what beneficiaries receive between sites can result in people moving between sites making site management and the provision of services much more difficult. Since the objective of the cash assistance program in Greece is to help beneficiaries meet their basic needs and reduce negative coping mechanisms, the value of transfers should be determined using a Minimum Expenditure Basket (MEB) methodology. In June 2016, the CWG chaired by UNHCR and CRS undertook an analysis of and provided recommendations for MEB (basic needs for food, shelter, non-food items, health and transportation for the refugees and migrants) for CWG members.²¹

“The MEB is defined as what a household requires in order to meet basic needs and its average cost. Determining the MEB serves three functions as holistic reflection of needs of affected populations. It is a primary tool to develop a cost and market based expression of minimum needs that is representative of what cash will be used for. The calculation is not an exact science but a rational estimation of funds absolutely needed by an individual and family of 5 members and family of 7 members. The calculation is based on the average family size of the target population and expected family need. It is to note that family amounts are not of 5 and 7. Hence the amount allocated to a family of 5 is not equal to the value calculated by multiplying the individual amount by 5.

The CWG has been conscientious of the potential negative public opinion towards providing refugees and migrants with cash support that would be above the amounts currently allocated to Greek vulnerable families through the country's social safety net program. The calculation of the

²¹ CWG meeting minutes June 2016

MEB took into consideration therefore to the Greek minimum consumption standards over the poverty line, minimum wage, or social safety nets.”²²

Key considerations in determining the MEB included²³:

- Rapid cash transfer feasibility assessments undertaken in Athens and various islands by different humanitarian actors over the course 2015-2016
- Beneficiary needs assessments – both surveys and focus group discussion on target group prioritized needs. Basic needs are defined by affected households themselves, International Humanitarian Law and Sphere Standards
- On-going post distribution monitoring and beneficiary satisfaction surveys
- Cash Learning Partnership (CaLP) Guidance, Best Practices and Lessons Learned
- Prices from local markets and access
- Response support where people are receiving in-kind versus not receiving in-kind
- Greek Government social protection programs (conflict mitigation/ supporting social cohesion)

In theory all implementing organizations base their transfer values on this agreed upon Minimum Expenditure Basket (MEB) approach, yet in practice there are several issues both with the approach and how it is applied.

Issues with the MEB approach

Firstly and most importantly, the transfer values are inadequate for meeting the basic needs of beneficiaries and there is evidence that some are still relying on negative coping mechanisms. There is compelling evidence from focus group discussions across 2 sites with 56 participants that the values are too low to cover basic need expenses, and people are still reliant on negative coping to meet their basic needs, which include borrowing from neighbors, rummaging through garbage, selling personal items like wedding rings or phones, not seeing a doctor or buying medicine as needed. This is particularly relevant for those who have medical conditions. There is also consistent feedback that families and individuals are running out of assistance by halfway through the month. This fact should be further confirmed and used to inform a revised transfer value.

Multi-purpose Grant Minimum Expenditure Basket (MPG-MEB)²⁴			
Greece Monthly Minimal Expenditure Basket			
No In-Kind Provided			
Item	Individual	Family up to 5	Family up to 7
Food	91.50	320.25	388.88
NFI (hygiene)	16.07	34.77	38.96
NFI(clothing and child)	4.50	48.08	55.34
Health	10	20	30
School Supplies	0	7	14
Phone Credit	10	10	10
Transportation	9.8	9.8	9.8
Total	141.87	449.90	546.98
Transfer Amounts	EUR 140.00	EUR 450.00	EUR 540.00

²² Ibid

²³ Ibid

²⁴ Ibid

Several assumptions were made during the June 2016 MEB analysis which have resulted in inadequate transfer values. This include:

- **One-size fits all:** Those with severe conditions such as cancer, injuries or disabilities are given the same amounts as young and healthy individuals. For those with health conditions, disabilities or who are elderly, the amounts allocated for health are insufficient. Medicine in many parts of Greece is expensive relative to the total value of transfers.
- **Seasonality:** The MEB doesn't include allowances for winter clothing, boots or good shoes, which are required during the cold winter months. Instead of providing a top-up of cash at the onset of winter, in-kind items were provided by UNHCR, but those did not include winter jackets or shoes fit for winter. These items are expensive in Greece and 4.5 Euros for an individual's clothing per month is not adequate during the winter months.
- **MEB not per capita across categories:** Phone credit and transportation is not adjusted for additional individuals in larger families or families with multiple adults.

Item	Individual	Family up to 5	Family up to 7	% Reduced
Food	45.75	160.125	194.44	50%
NFI (hygiene)	6.428	13.908	15.584	40%
NFI(clothing and child)	4.5	48.08	55.34	
Health	10	20	30	
School Supplies	0	7	14	
Phone Credit	10	10	10	
Transportation	9.8	9.8	9.8	
Total	86.478	268.913	329.164	
Transfer Amounts	EUR 90.00	EUR 290.00	EUR 330.00	

- **Prices across markets:** Prices can vary from market to market across Greece and it is likely that prices, depending on which markets were used to define prices in the June MEB analysis, are likely not relevant for across areas in the Islands, Mainland, and in the North.
- **MEB Basket:** According to FGDs conducted for this research and Mercy Corps' in-depth Post Distribution Evaluation in Lesvos conducted in December 2016, beneficiaries spend the greatest proportion of their cash assistance on food. The composition of the preferred food basket was focused more on calories than nutrition, as it does include any fresh foods, fresh fruits, vegetables or fresh meat and fish.

Item	Grams/person	% of minimum food basket	price/unit	price/ration/day
Medium grain rice	100	14.9	2.5	0.37
Bulgur	130	19.4	2.5	0.48
Pasta	50	7.5	1.5	0.11
pulses	60	8.9	4	0.36
Sugar	50	7.5	1	0.07
Sunflower oil	33	4.9	2.5	0.12

²⁵ Ibid

²⁶ Ibid

iodized salt	5	0.7	2	0.01
Canned meat	38	5.7	7.5	0.42
Milk	20	3.0	1	0.03
egg	20	3.0	2.5	0.07
bread	70	10.4	3	0.31
Lemon	30	4.5	2	0.09
leaves	65	9.7	6	0.58
Total (€)	671	100.0	38	3.05

- In-kind assistance would eliminate the need for beneficiaries to purchase their own food or hygiene items.** Transfer values are also set lower than the MEB due to the fact that sites provide food and provide some in-kind assistance. Since beneficiaries don't have to cover the cost of rent for example. Yet, while meals are provided, FGD participants all say that they spend a significant portion of their monthly assistance on food since what is provided, which is largely pastas and rice, is not culturally appropriate, nutritious, or appropriate for those with diabetes. Beneficiaries are purchasing food and cooking it using small fire pits close to their shelters. While these are not sanctioned, beneficiaries appear to prefer cooking their own food. The Cash working group has advocated the approval of the Shelter and NFI working group communal kitchen strategy, but while cash assistance decisions are waiting on this approval, beneficiaries are going ahead with preparing their own food. This fact must inform decision-making on how to proceed. Perhaps ensuring how beneficiaries cook their food safer in the short to medium term. Further, hygiene items provided by camps are not quality and so many people are using cash assistance for items such as diapers or feminine sanitary napkins, or detergent, which are more expensive than the MEB analysis estimates.

Another major reason transfer values are inadequate relate to the fees that beneficiaries must pay to access cash or make purchases at PoS terminals. Both IRC and Mercy Corps do not absorb these costs, which include [list costs]. These fees which add up to tens of Euros each moth are high relative to the transfer value, which is resulting in beneficiaries in effect having even less than the transfer value to spend. Agencies are also not uniformly covering costs of fees for withdrawals, balance checks, etc. There are charges associated with foreign exchange as some cards are USD-enabled. There is additionally a flat rate for withdrawal, etc. Agencies do not all cover the costs of fees nor communicate with beneficiaries about what the exact fees are. Agencies who do not cover costs are not in effect providing set transfer values. Would be helpful for beneficiaries to know exactly how amounts were determined – lack of knowledge is unhelpful – people are disconnected. Since CRS/ Caritas cover the fees associated with withdrawal which are around 1.4 euros per withdrawal, beneficiaries get the full amount of the transfer.

This means that while some agencies are actually providing 90 euros to an individual, some are in effect only providing some fraction of that once fees are included. This is not best practice because firstly, there is communication about transfer values to donors, this is based on a MEB to meet basic needs. If individuals are receiving only a fraction of the transfer value, the program is not being effective nor communicated honestly.

Finally, the MEB analysis paid significant consideration to avoiding any conflict with the host community and the Greek Government social protection programs. While factoring in potential conflicts between the beneficiary and host community is certainly important, a closer examination shows that transfer values could be higher without conflicting with the GoG social safety net payments, and indeed should be more

aligned as NGOs handover cash assistance programming to the GoG when a critical majority of beneficiaries are granted asylum and the right to work in Greece.

One of the key considerations made during the MEB analysis was not adversely impacting prices due to the infusion of cash assistance into markets, but Greek markets are generally very robust, which justified cash assistance in the first place. Due to tourism, many cities and markets across Greece have the ability to absorb significant variations in money supply. Additionally, the numbers of beneficiaries receiving cash assistance relative to host population size generally remains too small to impact prices. In some accommodation site areas where there are fewer or smaller markets, assessments for these specific areas are required to first determine whether cash is feasible and then to understand potential impacts. Yet to use these exceptions to keep transfer values low is troubling.

Another major factor used in the MEB analysis was “the cost of monthly minimum Greek family food basket, unemployment benefits and other social safety nets such as solidarity support.” The Greek unemployment rates have been used as a kind of upper limit for transfer values for beneficiaries. Yet when compared side by side, it is notable that humanitarian cash assistance values are significantly lower than monthly unemployment benefit rates.

Unemployment benefits and social safety net support in Greece²⁷

	Unemployment Benefits/ month
Individual	360€
Family (2 members)	396€
Family (3 members)	432€
Family (4 members)	468€
Family (5 members)	504€
Family (6 members)	540€
Family (7 members)	576€

While the amounts for an individual beneficiary is 90 Euros, it is 360 Euros for an individual Greek receiving assistance from a social safety net program. The amounts received by each additional person in a Greek household increases by 10% of 36 Euros per person. For a family of 5, it’s 290 Euros for humanitarian beneficiaries, but 504 Euros for a Greek family. For a family of 7, the disparity is even greater, 330 Euros compared to 576 Euros, respectively.

It’s true that the humanitarian assistance amounts and social safety net program amounts are not perfectly comparable. Greek social safety net assistance is meant to cover rent and food and is taxed. While everyone pays some tax on spending (sales tax), humanitarian assistance is non-taxable. Regardless of these differences, the amounts for beneficiaries of humanitarian assistance are still quite low and there is room to increase these amounts without approximating the amounts vulnerable Greeks receive inclusive of taxes. When considering handover to the government it would make sense to bring beneficiary transfer values in closer alignment.

There needs to be a measured approach as to what of the transfer value is harmonized, since different camps/ sites or those not living in camp settings have different needs and gaps in services. The MEB plus transfer value might need slight modifications across regions of Greece or sites.

²⁷ Poverty line is 665 Euros per person per month and up to 1,397 for a couple supporting two underage children. Legal minimum wage is 684 Euros per person per month.

There is a clear tension between what we should be giving people and what we are allowed to give.

How approach is being applied

There are additional issues with respect to how the MEB analysis and efforts to harmonize transfer values have been executed. CWG, co-chaired by UNHCR and CRS, has been trying to harmonize this approach, but guidance following the MEB analysis was given for strata of values based on the MEB analysis, which left room for interpretation for transfer values across various family size. This has resulted in each of the three agencies providing cash as of early October where providing different values across the number of beneficiaries. The strata guidance was 1 person= 90; family up to 4= 290; family up to 7= 330. The CWG meant that it should have been 90+50+50+50, until an upper limit of 330.

There is significant variance across implementing agencies as to how the guidance translates into practice and in effect how much each individual receives. While one NGO may be following the appropriate scaling, another is abiding by the strata breakdowns. Additionally, there is variance in whether NGOs absorb the costs of fees.

Finally, there is strong feedback from FGDs that transfer values should be set per individual and how values are set should be communicated clearly to beneficiaries. Family sizes ranging from 3-5 or 7-11 currently receive the same amount each month. There is strong feedback on how this isn't fair or working for beneficiaries (FGDs). The transfer amounts are represented across three strata: individual, family up to 5, family up to 7. This approach is problematic for several reasons.

1. Breaking up of families to game the system Issues with not knowing relationships from documentation alone.
2. There are families that have more than 7 people
3. A lot of resentment at getting the same for 5 people as for 2, 3, and 4.
4. Overwhelming desire to have the amounts be calculated and communicated on per capita terms.
5. The amount across strata do not add additional amounts for phone credit (assuming there is only one phone per family which is a protection concern), transportation, when transport is obviously charged per person not per family.

Finally, the MEB exercise from June 2016 “recommended that the MEB is reviewed every 6 months and updated based on PDMs and market monitoring data, as well as any significant changes in context.” UNHCR has put out a ToR for a consultant to review the MEB. It is recommended that the issues raised in this report are considered as the MEB and transfer values are being revised.

Beneficiary feedback, complaints mechanisms, and communications

All those interviewed as part of this research emphasized the importance of not only setting up feedback mechanisms and having a process for handling complaints, but being responsive to beneficiaries. While all NGOs have some form of beneficiary feedback and complaint mechanism and communications strategy in place, there has been some disparity between implementing agencies and sites, and between what NGOs set out to do and the perceptions of beneficiaries.

Effectively communicating with beneficiaries about the program is a crucial aspect in a cash program. It's important that beneficiaries know what the program is, how long various parts of the program will take, how long the program will last, how to use prepaid cards, how to make complaints and provide feedback.

IRC's communications strategies center on providing key pieces of information such as reduction of money (changes to program), end date of program, explaining how to use the card and doing this door to door. In addition to having a FAQ for IRC staff to help them answer questions as they verbally interact with

beneficiaries, IRC's written Communications materials include posters at sites, leaflets and information cards provided when the "reward" card is distributed. While some of these materials contain information which is now out of date, IRC staff have corrected this information by hand using Sharpies, while IRC works to update their materials. The FAQ has also been updated on a regular basis and incorporates lessons learned.

At the start of IRC's cash program, IRC established a hotline and staffed it with Farsi and Arabic speakers. In general people haven't really used the hotline because the hotline itself isn't toll-free. At some point there was an Arabic-speaking IRC staff member who would call people back and that worked for some time. Since setting up office hours however, people make the majority of their complaints or give feedback at office hours. IRC officers intake everything into KOBO which is then analyzed by the Senior Manager, since most issues are not immediately resolvable at the field level. There has been an effort to systematize the complaint handling process through excel. The system appears to be getting smoother, but it still generally takes over a week to respond to complaints, which according to FGD participants is too long.

According to the IRC's Senior Cash Manager, Richard Ross, "the IRC's hotline isn't used much only because of IRC's daily office hours which give people more direct access to IRC staff for complaints and feedback." While office hours might work for a majority of beneficiaries and be preferred by officers who know people and their issues, beneficiaries should also have discrete and affordable ways of making complaints, potentially even anonymously. There is also a lack of Kurdish, Urdu language skills but not many beneficiaries needing these languages.

Major themes that emerge from complaints center on lost cards or cards not working, or requests to change the name of the cardholder, or add people to a family. Lost cards are generally those retained by an ATM machine, which has two major causes. Either entering the PIN or withdrawal amount incorrectly. Since IRC's FSP shows balances online in dollars and charges a foreign transaction fee in addition to others, a main driver of lost cards is not knowing how much one can actually withdraw from an ATM. Incorrectly entering in more than the balance can result in an ATM machine retaining the card.

With its significant presence at sites, IRC is excelling at communicating with beneficiaries. 100% of the beneficiary participants at Eleonas said they were very clear on the process of cash assistance, how to use ATM cards, felt that they could find and talk to IRC staff about their issues, felt that IRC staff spent a considerable amount of time explaining things and answering questions. Having a solid ground presence of at least 2 staff located at each site per day is critical for beneficiaries to have access, share feedback, make complaints, or simply just feel heard. Consider structuring staff with some hierarchy, providing each layer of management with responsibilities. This can take a lot of work/pressure off of Coordinators and managers. Hire officers for technical or humanitarian experience and skills, and hire community workers for language skills. These strengths and learning should be shared and leveraged as other organizations start implementing.

Before starting up a cash program, Mercy Corps meets with stakeholders, conducts info sessions with beneficiaries to explain the program. Will do this either in person and door to door, which works best, or if there is a central place via loudspeaker. Finally, Mercy Corps has a hotline number which is free to beneficiaries which also works well.

According to Mercy Corps staff interviewed, while staffing the hotline is more straightforward on the Mainland is much easier in the main languages (Arabic and Farsi) and Kurdish, on the Islands, more languages are needed since there are so many more nationalities. Thus on the Islands, it has been harder to ensure that all complaints are being answered or addressed. Mercy Corps has office hours, and keeps complaints in a log book in excel. The person in-taking complaints is called a troubleshooter who sees if

they can resolve the issue. If not, and the complaint is assigned a reason code, and impact of the complaint, date, detail, name of troubleshooter is taken down. This information is shared with the Cash Coordinator. Additionally, there is a tracker for adding or removing people from families. There are segregation of duties for making these changes onto the payment platform.

Some of the issues Mercy Corps hears about relate more to the general tensions across the islands, since some people have been stuck there for 8-10 months, and different sites provide different services and not all of them have Child Friendly Spaces (CFS). Additionally, there is considerable frustration from men who cannot work. These tensions tend to come through in complaints but since there aren't immediate solutions, the situation can become violence.

In Moria, it has been difficult to go through each of the cash program cycle phases. Since the site is overcrowded, the process takes longer there and you have to have staff to do crowd control. It can be quite scary for staff members. Mercy Corps prioritizes staff safety and care, which may explain not keeping staff at each site permanently.

Mercy Corps also covers the highest number of sites in Greece with cash assistance and with fewer staff than most NGOs have. This has resulted in Mercy Corps staff being strained to deliver high quality programming across all their sites. The fact that they have is a testament to the high capacity of Mercy Corps staff, but being stretched thin has also resulted in a gap with communications, beneficiary feedback and complaint mechanisms.

A high portion of FGD participants at Kara Tepe reported they didn't know how to complain, were not asked about their feedback, didn't have access to a hotline number, didn't know when the program was going to end, and don't see Mercy Corps staff around in Kara Tepe. Additionally, office hours are not widely known. Responses varied on having instructions for how to use the cards, with those who were cardholders having received the instructions, while non cardholders had not necessarily seen these instructions. While providing this information with the card is helpful, there are no posters with Mercy Corp's contact details and office hours up at the site in Kara Tepe's information kiosk, which would be helpful for beneficiaries to have.

IFRC has a helpline and helpdesk, an info box so beneficiaries can engage anonymously. IFRC, due its ability to lean on the Hellas branch of the Federation, is able to cover all the various languages and has teams that do registration and distribution and another team that does support and community management team. The responsibility of the support team is to conduct key stakeholder and community meetings, man the help desk once a week, work with women friendly spaces, conduct trainings on how to use the card, and handle the communications materials, which include posters, FAQ, terms and conditions of cards. IFRC also has a video on how to use the ATM and is making a new video to demonstrate both ATM/ POS use. In the North, IFRC will only have one team of two people per four camp sites, and so won't have the necessary ground presence.

CRS/ Caritas engages community leaders and camp management before conducting distributions, and provides written communications materials during distributions, which include simple messages, leaflets on how to use ATMs. PINs are included in the envelope provided by financial service provider PFS which also prints out the hotline number and includes this in the envelope. Beneficiaries seem content with this communications strategy and no one changes their PINs unless they lose them.

CRS/ Caritas has a hotline which is not toll-free, and conducts random sample interviews over the phone and in person. Through the complaint hotline, CRS/ Caritas are not really seeing incidence of protection concerns, violence, or taxation. Complaints usually center on cards not working.

Before starting up programming Samaritan's Purse generally liaises with camp management and then with community leader(s) if they exist at the site, and follow-up with printed materials. SP plans to do in-person training sessions. This is based on key learning (beneficiaries didn't know how to use ATMs/ POS). They are also exploring doing a session before or along with distribution. SP is also revamping printed materials focused on what to do when cards are taken by an ATM or lost. In the past, since people were on the move, this wasn't as much of an issue. For those on the Islands, while not scalable SP would consider escorting cases physically to ATMs to show them how to operate their cards. SP policy will be to replace the card, but charge the beneficiary for replacing cards. Ahead of start of program, will communicate about the length of time of funding, procedures for helpdesk and hotline for complaints. Finally, Samaritan's Purse will man a helpdesk two days a week and also provide a hotline with set hours.

For complaints and feedback, SP will try to have at least one person per camp working with an interpreter, who will make a report of the issue and input into a tracking system. The Cash manager sorts and allocates issues back out to field staff to address. For referrals, SP has a list of available services at or around each site, and provides contact information for these (makes a recommendation not direct referral). In some of the islands, SP has provided multiple services in a site, and so has done internal referrals.

DRC has the necessary language skills and will provide a toll-free hotline and complaint box.

Monitoring including post-distribution monitoring

Very few Post-Distribution Monitoring (PDM) exercises have been conducted in Greece, and no NGO had at the time of this research carried out PDMs consistently. Reasons for this range from not having harmonized questions across implementing NGOs, to not having the staff capacity, to access to site issues which can delay conducting PDMs.

Those NGOs who have conducted PDMs have not shared them with the exception of Mercy Corps' lessons learned report from their PDM evaluation of cash programming in Lesvos, which is a well-crafted and useful report. All NGOs have plans to do PDMs with harmonized questions and plan to take a sample of around 10-15%. NGOs are not generally carrying out other forms of monitoring as price and site have generally been deemed unnecessary.

There is some variation in how organizations conduct PDMs, some do them door to door, some through phone calls with beneficiaries with follow-up if deemed necessary, and some will conduct FGDs to deepened findings from PDMs.

ANNEX E: LIST OF DETAILED RECOMMENDATIONS

Access to Sites

- ☑ Create a centralized position responsible for liaising, coordinating, and advocating with MoMP to obtain authorization for sites and renewals, as well as responding to procedural queries; building constructive relationships and trust with site managers to ensure effective and efficient implementation; and to advocate on behalf of NGOs to improve and streamline program delivery. This position requires strong Greek language and personal skills, and in-country experience.
- ☑ It is important that NGOs have regular check-ins with site managers, to include their feedback and inputs to help improve programming, and support MoMP's efforts to build capacity across site managers.

Managing inflow and outflow

- ☑ Managing inflow and outflow should not be the responsibility of any one NGO. UNHCR and the GoG must help avoid duplication across sites and urban relocation programs through a centrally managed duplication tracker.
- ☑ There is a strong case for a single database with all actors having access that is linked to the Greek Asylum Service process.
- ☑ Sites/camp managers should share the burden of regularly updating who still lives at a site and family size, while NGOs should assist camp management with outflow management by confirming and updating lists through their visual registration and verification processes.
- ☑ GoG should incentivize site managers to manage outflow effectively and have updated and accurate figures across sites each month.

Beneficiary Registration

- ☑ The GoG official registration documents should indicate family connections by leveraging all existing information including on police notes, where family connections are sometimes captured.
- ☑ UNHCR should help GoG and camp management with the appropriate registration procedures in a timely manner. GoG must guarantee at least a police note.
- ☑ MEAL system must be harmonized through a single database and data infrastructure, tools, server, baseline, monitoring must be aligned in order to effectively capture and aggregate comparable data across agencies to ensure there is broad understanding on learning, trends, and to inform appropriate exit strategies.

Beneficiary Verification

- ☑ Agencies should consider setting a certain percentage of inclusion error they are willing to accept for the sake of limiting exclusion error in a timely manner as they look to scale efficiently.
- ☑ Camp management and informants should be used to triangulate information on who actually lives at a site, family size, etc. Intel should be systematically gathered and shared across staff. Having focus groups with staff is also helpful to improve the verification process. NGOs should also collaborate more actively with site managers.
- ☑ As NGOs take on new sites and work to harmonize approaches, there is a significant opportunity for cross-learning; it is highly recommended that NGO staff implementing cash assistance are able to shadow each other during registration, verification, or distributions to learn from each other to improve and hasten their own processes.
- ☑ Once assistance has started at a site and as it progresses, NGOs should undertake systematic after action reviews as well as compiling and analyzing feedback from beneficiary feedback mechanisms.
- ☑ Registration and verification processes are good opportunities for communications and messaging, and should be used as such.

- ☑ It's very important to complete verification in a timely manner to ensure there are no delays with top-ups, and beneficiaries receive top-ups at the same time each month. Regularity and consistency is extremely important to beneficiaries (FGDs).

Distributions

- ☑ Remain flexible, document and share what is working and what is not at each site. Conduct and share PDMs and on-site monitoring.

Process for monthly top-ups

- ☑ Choose a payment platform that allows for bulk/ batch reloads.
- ☑ It's very important that beneficiaries receive top-ups at the same time each month – this helps them with planning and reduces anxiety (FGDs).

Assessments and analysis

- ☑ A gap analysis on assessments should be carried out and filling gaps should be coordinated across implementing agencies. Assessments that have been carried out must be accessible and NGOs should divide up future assessments so that others can benefit from them.
- ☑ NGOs should be conducting needs assessments since the original cash program and cash transfer values were designed not to meet basic needs, but rather to provide enough for resilience as people traveled through Europe. Additionally, as the MEB approach and transfer values are currently being reviewed, NGOs need to conduct needs assessments to know whether basic needs are being met.
- ☑ A baseline assessment should be carried out across beneficiaries to track progress against outcomes, especially if there is movement away from blanket coverage as the GoG assumes responsibility for cash assistance as part of NGO exit strategies.

Payment method

- ☑ Continue to use cards, but create harmonized communications materials with pictures for those with language barriers, staff demos, and monitor complaints/ feedback to ensure everyone knows how to use the cards and don't lose/forget PINs. Leverage what various NGOs have already done, including CRS/ Caritas which provides beneficiaries pictorial instructions.
- ☑ Do not allow PINs to be the last 4-digits of the card, but instead include PINs in envelope or set up PINs for beneficiaries and store in a database. While there is a small risk of the staff member with access to the database committing fraud, this is less of a risk relative to the high impact and prevalence of beneficiaries losing cards because of misplaced PINs.
- ☑ Check-in regularly with beneficiaries as well as vendors and stores to ensure beneficiaries are not experiencing issues using their cards for POS transactions.

Approach to Unaccompanied Minors (UAMs)

- ☑ While the CWG and CPWG are making some progress toward defining a suitable approach for UAMs, this issue must be urgently prioritized and harmonized across agencies.
- ☑ Base decisions of assistance modality for UAMs on evidence, not on anecdotes or fears, which are inconclusive across child protection and cash team staff. UAMs approach and modality should be based on the CPWG protection assessment or evidence of risks and mitigation strategies from cash staff.

Comparison of Financial Service Providers (FSPs)

- ☑ Do not move to one FSP too quickly; leverage competition for systematic learning of what works and to determine which FSP can actually deliver efficient scale-up before choosing a single FSP/data management partner for all of Greece.

- ☑ Agencies should document and openly share their experiences with their respective FSP on key performance indicators related to payments and links to data management mechanism. Supplier performance must be deliberately tracked and evaluated.
- ☑ Update bid criteria for future contracts. Weight other factors highly beyond cost (assuming an alliance or cash consortium model would enable better negotiated rates) such as staff time required to load cards, card issues for beneficiaries, FSP/partner responsiveness and time and resource commitment to implement systemic solutions.

Value of transfers

- ☑ Base transfer value on proper MEB analysis, not on constraints.
- ☑ Absorb or offset fees so beneficiaries in effect can spend the total transfer value and these effective amounts are consistent across implementing agencies.
- ☑ Deliver and communicate transfer value per capita; while some families may have additional savings at the end of the month through economies of scale afforded larger families, this is more acceptable than large families not being able to meet their basic needs.

Beneficiary feedback and complaint mechanisms

- ☑ Have NGO staff shadow other NGO staff across the registration, verification, distribution, and process. This would allow for cross-learning and building a technical community of practice. This recommendation was made by CRS/ Caritas.
- ☑ Test out the entire ATM and POS process, map out likely fees, and incorporate an estimate of fees based on point of use in communications materials. This is still pertinent for beneficiaries even if NGOs absorb fees.
- ☑ Develop key harmonized communications materials and messages, and use a combination of leaflets, posters at sites, communication with community leaders, site managers, etc. More is better. CRS/Caritas have created instructions for how to use ATMs with images, which could be a helpful start. IRC is creating an instructional video that will run on loop during distributions in Arabic and Farsi.
- ☑ Conduct FGDs with beneficiaries as well as with staff to understand if there are gaps in communications materials or if complaints are not being addressed in a timely manner. Check-ins with staff skipping one level can also be helpful to ensure accountability across levels.
- ☑ Use results of complaints and feedback to inform program improvements, share results across agencies and changes back to beneficiaries so they know their views are being meaningfully considered.
- ☑ Have at least two staff per site each day and hold office hours. Provide a hotline that is toll-free to beneficiaries to collect discrete or anonymous complaints/feedback.
- ☑ Systematically analyze beneficiary preferences for feedback mechanism channels and approaches.

Monitoring

- ☑ Prioritize and carry out harmonized PDMs, share results, and aggregate and analyze results through a shared database.
- ☑ Ensure that PDMs are conducted by non-cash program staff such as MEAL staff, as the results can be contaminated by staff involved in cash delivery. Since not all organizations have the internal capacity to have PDMs carried out by their non-cash staff, consider other options such as joint monitoring or having an independent organization conduct PDMs.



IFRC registration at Softex in Northern Greece by Poul Henning Nielsen