LINKING HUMANITARIAN CASH AND SOCIAL PROTECTION IN UKRAINE

Emergency Response inside Ukraine
Thematic paper
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List of Acronyms

CVA  Cash and Voucher Assistance
CWG  Cash Working Group (of Ukraine if not specified)
DMS  Data Management System
DSA  Data Sharing Agreements
GoU  Government of Ukraine
GMI  Guaranteed Minimum Income
IDPs  Internally Displaced Persons
HCT  Humanitarian Country Team
KI  Key Informants
KIIa  Key Informant Interviews
LNGOs  Local Non-Government Organizations
MEB  Minimum Expenditure Basket
MoSP  Ministry of Social Policy
MoUs  Memorandum of Understanding
MPCA  Multi-Purpose Cash Assistance
NGCAs  Non-Government-Controlled Areas
social protection  Social Protection
STAAR  Social Protection Technical Assistance, Advice, and Resources Facility
SRSP  Shock Responsive Social Protection
WB  World Bank
**Introduction**

Eight months after the Russian invasion, Ukraine has rapidly become one of the world’s largest humanitarian crises. As of 23 July 2022, 6.3 million people are internally displaced. Of the 10.4 million recorded border crossings to other countries, approximately 4 million migrants have returned to Ukraine.\(^2\) With functioning markets in most of the territory, the Humanitarian Country Team (HCT) prioritized Multipurpose Cash Assistance (MPCA) as the most appropriate humanitarian assistance for the Ukraine crisis. According to the Ukraine Cash Working Group (CWG), there are currently 34 cash actors with operational presence in Ukraine\(^1\) reporting their activities to the cash working group (CWG), and the current cash sector is delivering $763.8 million to 3.93 million people in need.\(^2\)

The CALP Network is the co-facilitator of a Learning Group – working under the governance of the CWG. The overall objective of this group is to identify areas of improvement and collective learning, strengthening the cash response in Ukraine based on global learning and experiences. This thematic paper will contribute to learning by documenting key lessons learnt, emerging critical issues, and real-time recommendations.

**Methodology and limitations**

The researchers used participatory approaches to ensure that the perspectives and insights of all key informants (KIs) were taken into consideration. Primary data collection was conducted mainly through key informant interviews (KII) with Cash and Voucher Assistance (CVA) actors\(^3\) the researchers did not interview CVA recipients, nor government officials. The consultants interviewed a total of 33 key informants including CWG and Task Team leads, donors, international and national NGOs, and UN agencies. The first draft of the research paper was reviewed by members of the Learning Group. Two workshops were organized with the Learning Group, one to conduct a prioritization exercise and select the three-priority thematic learning areas\(^4\) and the second one to discuss some of the key findings from the KII. Secondary research was conducted via a review of key publications relevant to the selected theme, from various contexts.

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\(^1\) As reported by the CWG co-leads. As of 30 September, 34 MPC partners report to the CWG – 27 INGOs, three NNGOs and four UN agencies.

\(^2\) This includes the Grand Bargain commitments that were made at the World Humanitarian Summit, DG ECHO Thematic Policy Document No. 3 on Cash Transfers; UN’s Common Cash Platform, the Collaborative Cash Delivery Network, and the Sustainable Development Goals.

\(^3\) This includes the Grand Bargain commitments that were made at the World Humanitarian Summit\(^[1]\), DG ECHO Thematic Policy Document No 3 on Cash Transfers\(^[1]\); UN’s Common Cash Platform, the Collaborative Cash Delivery Network, and the Sustainable Development Goals.

\(^4\) The Learning Group voted Linking Humanitarian Cash to Social Protection as a first priority; Enabling Local Responders as a second; and Registration, Targeting and Deduplication as third priority. Other themes included Coordination of Cash Assistance, MEB and Transfer Values, Protection and inclusion, and AAP.
The researchers collected the data remotely through virtual meetings and workshops. Due to the scope of work, the researchers did not interview cash recipients. Equally, the depth of the analysis was contingent on the availability of key informants, and the information available. The secondary data review was limited to studies available in the public domain, documents shared by CALP, and the researchers’ experience. To date, limited research has been published on the humanitarian response to the 2022 invasion. The researchers used the Social Protection Technical Assistance, Advice, and Resources Facility (STAAR) recent publication on social protection in Ukraine, released while this paper was being developed.

**Context**

**Theoretical framework**

The Grand Bargain signatories highlighted that the delivery of humanitarian Cash and Voucher Assistance (CVA) should, if possible and appropriate, use, link, or align with local and national Social Protection (social protection) mechanisms. Several international frameworks recommend that cash assistance should be provided through social protection systems, where this is feasible and appropriate. In recent years, growing awareness and expectations to strengthen linkages between humanitarian CVA and social protection systems resulted in the development of several theoretical frameworks and a growing body of literature on the topic. Despite growing attention, implementing the alignment of humanitarian cash with existing social protection systems requires significant changes in the humanitarian architecture, different funding mechanisms and longer-term planning and delivery timeframes.

The literature on social protection alignment highlights several pathways for the involvement of the humanitarian actors in government social protection, as follows:

- Establishing parallel systems;
- Aligning such aspects as transfer values, frequency, and duration;
- Piggybacking on social protection systems, such as using existing social protection delivery mechanisms;
- Partial or full integration through vertical or horizontal expansion, such as the provision of temporary top-ups to populations already registered through the social protection system and/or expanding the reach of the social protection through new enrolments, and the creation of new social protection schemes;
- Through design tweaks and adjustments, such as system improvement contributing to greater shock responsiveness and improved adaptation to crisis response to better meet humanitarian needs.

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5 STAAR (2022).
6 This includes the Grand Bargain commitments that were made at the World Humanitarian Summit, DG ECHO Thematic Policy Document No. 3 on Cash Transfers; UN’s Common Cash Platform, the Collaborative Cash Delivery Network, and the Sustainable Development Goals.
The integration of humanitarian CVA and social protection is not an ‘all or nothing’ exercise. It is about strategically working together to leverage the strengths of both humanitarian and social protection mechanisms. As the SPACE paper notes (see Figure 1), the options for linking humanitarian aid and social protection lie on a continuum of integration based on the systems’ maturity (see SPACE diagram above). The more mature the social protection system is, the greater the opportunities for integration. In nascent or weak social protection systems (or contexts in which it is not appropriate), other options to coordinate the two systems may be feasible, including:

- The provision of technical assistance to government social protection personnel;

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8 One reviewer pointed out that while the continuum is an excellent starting point for measuring and setting standards on integrating humanitarian cash and social protection, it is not prescriptive of how to do it. Hence, it does not help agencies identify how to integrate the two, which is why practical guidelines are important.

9 Smith (2021).
- Coordination to ensure complementarity between social protection and humanitarian programmes.

**Ukraine’s social protection system**

Ukraine’s social protection system offers a solid platform for delivering large-scale cash transfers, yet international humanitarian actors have been unprepared to build on the existing system. Ukraine’s social protection system is mature, relatively comprehensive, and increasingly digitized, with experience in adapting to shocks, including in the 2014 Russian invasion, as well as to the COVID-19 pandemic. The World Bank has supported the social protection system, including through the digitization of services. The government is in the process of digitizing, centralizing and creating a single social registry to reduce unintended overlap among its multiple social benefits and safety net programmes\(^{10}\).

Since the recent escalation of conflict, the government updated the legal framework for social protection to support those affected by the conflict. Although the system demonstrated that it was able to adapt to shocks in the past, the current situation brought a significant financial burden and challenges that are yet to be understood. However, as one stakeholder noted, there is currently no evidence to suggest that the government was not able to fulfil the ongoing welfare payments. The Government of Ukraine (GoU) has identified social protection payments as the second highest funding priority after the military.

Ukraine’s social protection system includes cash transfers (the focus of this paper), as well as social assistance services, employment, and insurance programmes. There are two types of cash transfer programmes and multiple associated programmes:

1. Categorically targeted schemes that include: family and care allowance such as child, disability, old age, IDP housing allowance, refugee status, single parents, maternity benefits, etc.
2. Poverty-targeted programmes such as: guaranteed minimum income (GMI) scheme,\(^{11}\) which includes social benefits for low-income families, housing and utilities subsidies (HUS) for housing, energy, electricity and utilities, caregiver allowance, social pension, and unemployment benefits.
3. An IDP scheme, established at the onset of the 2014 conflict, which targeted close to 1 million individuals who have been forcibly displaced or whose housing has been impacted by the ongoing conflict.\(^{12}\) Applications for assistance are made on-demand on an online government platform\(^{13}\) and processed at municipal level by the social service workforce, which performs both administrative and case management functions.\(^{14}\) Based on consultations with the Ministry of Social Policy (MoSP) and the Ministry of Reintegration, Task Team 5 reported\(^{15}\) that there are no

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\(^{10}\) STAAR (2022).
\(^{11}\) STAAR (2022).
\(^{12}\) Ibid.
\(^{13}\) One reviewer pointed out that the digital infrastructure still demands human infrastructure, and this could be problematic in the light of ongoing military conscription. The reviewer also flagged that this is a work model that leaves economic decisions of families in the hands of social workers, whose competencies vary.
\(^{14}\) Ukraine: Task Team 5 - Meeting Minutes with MoSP - 05 July 2022
\(^{15}\) Ibid.
fiscal challenges with providing nationwide state aid to IDPs, except for process and payments delays due to technical issues with the DIAA app.

No social protection system is perfect. There is an overall hesitancy of donors to invest the bulk of humanitarian funding through the government systems, since Ukraine is ranked 122 out of 180 countries on the corruption perception index, and 23% of public service users reported they had paid a bribe in the previous 12 months. The literature identifies issues with the GMI, such as inadequate local budgeting and poor levels of coverage, lack of gender responsiveness, inadequacy of benefits, and exclusion of the most vulnerable populations, such as older women and Roma/Sinti communities. Categorical schemes, such as services for older people and people living with disabilities, are amongst the least resourced. For people with disabilities, governments services are mostly in-kind, ad hoc and short term.

There are conflicting reports about the extent of access to social benefits in non-government-controlled areas (NGCAs) after 2014, but it seems those affected by access constraints were able to receive their entitlements as long as they could physically enter government-controlled areas. This restricted access for the less mobile, such as the elderly and people with disabilities, and for the unbanked population living in NGCAs and conflict zones. Due to the increasing demands and uncertainties brought on by the conflict, local services are under significant pressure, and suffering from reduced capacity to monitor who is able to access social assistance benefits.

Due to the maturity of Ukraine’s social protection system and its coverage of the affected populations, the SPACE theoretical framework suggests that there should be a high level of integration between humanitarian aid and social protection. Integration should involve analysing and understanding the gaps of existing cash-based social benefits, supporting the vertical and horizontal expansion of social protection programmes, or the set-up of new schemes that piggyback on existing systems and capacity. Similarly, the majority of KIs focused on the handover of humanitarian caseloads to the government social protection programmes. For these reasons, this paper will focus on analysing the state of current linkages through the prism of integration (partial or fully), and the plan to handover, refer, and/ or integrate humanitarian caseloads into existing government programmes. As the GoU is a party to the conflict, the high level of integration should apply in government-controlled territories, however, the situation in NGCAs and conflict zones warrants a distinct approach which will be further elaborated by this paper.

Theoretical and operational considerations

A lost opportunity?

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17 According to other sources, becoming an IDP is a requirement for maintaining benefits. One reviewer flagged that only those who were receiving their benefits through the post were impacted by the conflict; however, the vast majority were receiving benefits in a bank account, and for them, the service was uninterrupted. Those affected by access constraints were able to receive their benefits in a bank account if they informed the Ministry of Social Policy via their offices or online via the DIIA app.
'Was this [the failure to integrate with social protection from the onset of the crisis] a lost opportunity? We should have explored linkages early on, but there was a general lack of awareness from the majority of organizations and even ignorance – now [about the existing programmes], handing over the caseload to the government will require time, including solving legal bottlenecks, etc.’

‘There were a lot of people deployed, with little knowledge of the context, who were focusing only on delivery.’

Humanitarians rarely work in countries with as well-developed a social system as can be found in Ukraine, which features a strong government willingness to support the affected population. The context, supported by significant amounts of flexible funding, provides a unique opportunity to align with, complement and strengthen government social protection systems. **Ukraine could and should be a model of partial to full integration**, at least in government-controlled areas. As noted by many KIs, the duty of welfare responsibility lies with the GoU as the main duty-bearer, so humanitarian organizations need to engage with the existing systems. According to KIs, there is high-level political pressure from the top donor officials, who are pushing for concrete steps in this direction.

Although some organizations engaged early on with the GoU, the humanitarian cash programmes were largely established in parallel, with blanket coverage of displaced people and only a limited degree of social protection alignment at the outset. For example, the CWG aligned transfer values with the government IDP programme and used tax ID numbers as unique identifiers, and some organizations were able to sign data sharing agreements (DSAs) with the government to use its list of newly registered IDPs. Despite these initial collaborations, the assumption of the majority of KIs was that coordination with social protection would evolve, rather than serve as the starting point for the initial response.

Generally, the provision of humanitarian cash to social protection activities in the Ukraine response lies on the integration continuum as introduced by SPACE,¹⁸ with most agencies adopting a partial alignment with social protection schemes (aligning the transfer value, using the tax ID, using government lists of IDPs). In terms of integration, only UNICEF had tried to integrate its cash programme with social protection systems (family/child allowance categorical scheme) and from the outset, and approach which failed due to the legal and accountability barriers encountered. While coordination efforts are taking place, they are still at a low level, considering the maturity of the social protection system (the more mature the system, the higher the degree of desired integration, assuming the willingness of the government).

Several KIs argue that the Task Team on social protection was established too late in the response, as systems should have been mapped early on to enable linkages or prevent duplication.¹⁹ The overall perception is that the Task Team has a good workplan and terms of reference and has been instrumental in the steps taken to date, although no specific guidance or recommendations have been made yet. The

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¹⁸ Smith (2021).
¹⁹ Two reviewers pointed out that this should have been done prior to the conflict escalation, as a preparedness measure. However, as one reviewer argued, cash transfers prior to the escalation were at much smaller scale and exclusively in the Donbass region, hence potentially a different reality in terms of approaching the social protection question.
two key ministries (MoSP and Ministry for Digitalization) are already developing their respective digital systems, which points to a lost opportunity in terms of harmonization across systems.

Some of the agencies are receiving referral lists of people registered through the government-run e-dopomoga website launched in May, and large-scale governmental registration of IDPs prior to that, which has so far enabled for a rapid scale-up of cash programmes. While receiving referrals has been key during the scale-up, there is a lack of consensus regarding whether this qualifies as coordination with social protection systems. The fact that some agencies use government referrals may suggest a degree of alignment with social protection, but other KIs point out that the acceptance of referrals does not guarantee beneficiaries a place in any of the government-run longer-term schemes, nor the IDP programme, which could be a natural next step. This point has created great confusion among humanitarian agencies that are less conversant in the subject. As one reviewer pointed out, given the very high coverage of social protection programmes, there is a very high likelihood that humanitarian cash recipients are already receiving state benefits (e.g., IDP housing allowance, pensions, child grants, unemployment support, disability, etc. by the government). However, without a clear link between humanitarian cash recipients and social protection systems, those who recently qualify for state support, such as those recently unemployed, single-headed households, etc. are neither identified, nor referred to the appropriate state services.

**Overall, the pressure for direct delivery by international actors was prioritized over working through existing systems,** which would have required more complex legal and funding mechanisms. One stakeholder noted: ‘In a context like Ukraine, working with the government to map and analyse gaps with the social protection schemes should have been the priority, along with providing immediate assistance for the first couple of months, in parallel if necessary. Seven months in and there is still no clarity on where the gaps are and how these could best be filled.’ There was a high level of interest in social protection linkages among humanitarian actors at the outset of the response, leading to the establishing of the social protection Task Team in May, but commitment was abstract and lacked concrete and strategic action. Humanitarian actors relied on short-term surge support, with staff with limited understanding of the context, let alone adequate understanding of social protection linkages. Some argued that, for the HCT to prioritize efforts to coordinate with social protection programmes, donor pressure was required.

To date, the engagement of humanitarian actors in Ukraine’s social protection system has been significantly influenced by their respective institutional position and expertise, which has skewed the discussions towards large cash actors. Yet, **many key informants had higher expectations of the large UN humanitarian agencies to engage with social protection systems more extensively than they had,** including piggybacking on existing systems, due to their expertise and perceived favourable position with the government.

**International humanitarian funding has been deeply skewed towards international organizations, while government programmes and local actors still suffer from a general lack of funding**. According to the

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20 The reviewer suggested that almost half of the population is receiving some type of benefits.
21 Given the importance of HCT in influencing the uptake of MPCA in the crisis, one explanation could be that the group had planned for a worst-case scenario where a fall of the GoU was most likely.
22 [https://www.humanitarianoutcomes.org/Ukraine_review_June_2022](https://www.humanitarianoutcomes.org/Ukraine_review_June_2022)
CWG, out of the $2.88bn total funding reported to the UN Financial Tracking System (FTS), as of 9 August, 2.49 million people received $540 million from 27 partners in 25 oblasts. In May, the UN FTS showed that UN agencies received about two-thirds of the humanitarian aid funding for Ukraine, international NGOs received 6% of the funding, while national Ukrainian NGOs received 0.003% of the total amount. The report shows that, at the beginning of the response, humanitarian actors were struggling to recruit staff and were unable to implement, with largely unspent funding. As a KI has argued: ‘If they had the right funding from the beginning, such as budget support, the government could have run the show.’

The results of humanitarian actors’ focus on operational delivery over strengthening existing social protections include:

- **Replication of government IDP programmes:** With a well-performing state-run IDP programme established since 2014, some KIs reported that a completely parallel humanitarian cash programme targeting IDPs, especially in the accessible western part of Ukraine, should not have been set up and scaled. While the majority of international actors took an average of three months to set up their cash operations, a vertical expansion of the government IDP programme through top-ups for the IDPs could have been a more appropriate and faster response, building on already functioning registration and delivery systems. Many of the large-scale IDP programmes are replicating the government programme, using the same transfer value but reducing the duration of assistance from six to three months. This was a lost opportunity for people to access longer-term government support and strengthen existing systems. In this context, some question the added value of international organizations delivering cash at scale, when state systems were able to do so, had they had the financing. Similarly, the government has flagged that a large-scale humanitarian cash for winterization programme will duplicate the comprehensive system of subsidies for utilities covering 2.5 million households, which is soon to be launched. The humanitarian cash for winterization programme will not be implemented as a result.

- **A protracted timeframe for integration and handover:** KIs have flagged that there are growing expectations to hand over the humanitarian caseload to social protection institutions within the next couple of months and to hand over the response to development actors, which some humanitarian actors find too soon. Even with mature and operational social protection systems, experience elsewhere suggests that once humanitarian cash operations are set up in parallel, integration with social protection and the referral of caseloads with chronic needs for longer-term state support will require a long-term framework, ready institutions, and a matured and consolidated cash sector. This level of integration with social protection system could only be enabled over the course of years –

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24 *Ibid,* “Instead, three months later, most of the money was still unused, sitting with international organizations that are constrained from funding by compliance requirements that are too heavy and time-consuming for small volunteer groups to meet.”


26 Households whose aggregate income doesn’t allow them to cover necessary heating and utility costs in wintertime.

27 The majority of KIs interviewed for this paper understand the concept of linking humanitarian cash with social protection through the lens of partial or full integration.
while navigating complex legal frameworks around data sharing and consent, longer-term funding, targeting, system interoperability, changes in political dynamics, and Ukraine government priorities. One KI argued that organizations proposing integration in six months are overly optimistic. While it is difficult to justify longer-term investments into a parallel humanitarian system, it is key to develop a transition strategy with the buy-in of the CWG and its members.

- **Coordination that is not fit for enabling social protection linkages**: The architecture for humanitarian, and specifically, cash coordination needs to change if stronger linkages to social protection are expected. Actors do not have a platform for discussing the issue operationally outside of the CWG Task Team on social protection. This paper proposes the establishment of a coordination forum outside of the CWG that brings top decision-makers from humanitarian and development actors, government and donors around the same table to develop a long-term strategy and policy. These nexus platforms have been established in Somalia with the Technical Assistance Facility, a Social Protection Sector Coordination Committee in Iraq, the Inclusive Donor Working Group on Cash and Social Protection in Yemen.

- **Limited interoperability and deduplication**: As discussed in-depth in the first paper on Registration, Targeting and Deduplication, agencies are very unlikely to adopt a single data management system (DMS) during an emergency response and have so far found a solution for deduplication among humanitarian organizations. There are risks that the fragmentation of the response and the multiplicity of DMS systems working in silos will further delay progress on systems interoperability. As the government plans to expand its IDP programme, there are concerns over the lack of deduplication systems between humanitarian actors and government systems, which require a data sharing agreement (DSA) with the government, as well as a solution for deduplication. The government is currently developing the DIIA application for deduplication for humanitarian actors, as well as the technical capability of deduplication with government social benefits or assistance programmes. However, as one reviewer pointed out, this requires further negotiations with the government and needs to be incorporated in legal frameworks. Even then, it is unlikely that all humanitarian agencies would participate in these systems due to concerns over upholding humanitarian principles.

- **Lack of focus of international humanitarian organizations**: Despite criticism of the parallel humanitarian systems, humanitarian organizations can add value in meeting critical needs,

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28 For example, according to the CWG, current changes in the Ministry leadership may cause a revision and reorganization of the current social protection system. There is a high level of uncertainty whether this will lead to significant changes in the system, and whether integration efforts might need to be halted until both the reorganization and the 2023 budget become clearer.


30 [https://reliefweb.int/attachments/a8a45911-497a-482a-a1a1-8474af7c9ba1/30.6.2022%20PR%20Social%20Protection%20Sector%20Coordination%20Committee%20Meeting_%D9%8FENGLISH_FINAL.pdf](https://reliefweb.int/attachments/a8a45911-497a-482a-a1a1-8474af7c9ba1/30.6.2022%20PR%20Social%20Protection%20Sector%20Coordination%20Committee%20Meeting_%D9%8FENGLISH_FINAL.pdf)

31 CALP (2022).

32 One KI argued that the self-registration data might not be finally accepted by Mosocial protection, as verification will have to be conducted either through spot checks or blanket coverage.

33 DiiA/DIIA is the name of the application which in Ukrainian means ‘Action’

34 As mentioned in our first paper on Registration, Targeting and Deduplication (CALP 2022), the DIIA app is also used for military purposes.
particularly in areas beyond the GoU’s reach. Needs remain high in conflict areas, hard-to-reach and non-areas (NGCAs), where little to no assistance has been delivered to date and where government social benefits delivered through the post remain inaccessible for many. KIs argue that targeting areas where the GoU is not present is indeed feasible, as people find ways to access cash, including travelling to areas where they can withdraw cash transfers. In addition, **existing government social protection schemes do not currently include all vulnerable populations**\(^{35}\) and many argue that agencies should refocus their operations on reaching the most vulnerable groups,\(^{36}\) including those being left out of state programmes.

**Preserving humanitarian space**

*‘We are still working in an active conflict, and we should be careful, especially around the government agenda, our neutrality, and impartiality of the response.’*

Given the mounting pressure for humanitarian actors to consider coordination with social protection schemes, significant barriers persist, according to key informants. Below are some of the main challenges in the Ukraine response:

- **Limited experience:** International humanitarian actors have few concrete experiences in operationalizing partial or full integration with social protection systems. As one reviewer pointed out, there are few instances where the international humanitarian system as a whole looks first to social protection in the response. Currently, there are no examples of humanitarian responses integrated with social protection from the onset of the crisis. The literature cites examples where humanitarian programmes were well established and consolidated long before coordination and integration with social protection systems, which also took several years to materialize (e.g., seven years in Iraq, more than a decade in Ethiopia\(^{37}\), etc.). One could argue that, while the humanitarian handbook should, it is not currently built to factor in social protection from the emergency response phase, and in the humanitarian field global expertise on social protection is in short supply. The majority of humanitarians do not know how to engage operationally with social protection, especially at the emergency response phase.

- **Role of development actors and financing:** While humanitarian donors are willing to support the transition from humanitarian cash to social protection systems, they see a significant role for development actors to finance social protection systems in a middle-income country like Ukraine. Some KIs argued that despite the rhetoric, there is no clear humanitarian and development donor commitment to fund the transition to social protection systems. Humanitarian efforts should be focused on those with conflict-related humanitarian needs that are either excluded from or whose needs are not met through the existing social protection programmes mechanisms. This can be done

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\(^{35}\) STAAR (2022); see page 3 for an overview of the social protection flaws.

\(^{36}\) A customized approach, taking into consideration the special needs of those with low digital literacy, the disabled, the elderly, etc. that might need in-person support with the registration and programme delivery.

\(^{37}\) Agenda for Humanity (2021).
either by connecting individuals with the appropriate government assistance or, if not appropriate, through direct assistance from humanitarian organizations.

- **Adhering to humanitarian principles and maintaining humanitarian space**: While there is good reason to adopt a nexus approach and hand over to development actors, some argue that the active conflict still has no end in sight. Humanitarian response actors find themselves in a continuous effort to adhere to humanitarian principles. There remain concerns that working exclusively or in a large part through government social protection systems could compromise perceptions of humanitarian organizations and negatively affect future access to populations in contact areas and NGCAs. The GoU has asked humanitarian actors to refocus operations in the south and east of the country, often in areas that are either along the conflict zones, in areas retaken by the GoU or in NGCAs. While this could be an effort to complement social protection programmes, this request needs further unpacking. One KI argued that humanitarian cash programmes might be subject to a political agenda, especially if they serve areas of return. Working through the government’s social systems could further compromise the neutrality and impartiality of humanitarian organizations, especially for those aiming to target hard-to-reach areas. **While social protection schemes are an appropriate avenue for supporting IDPs in government-controlled areas**, humanitarians see risks with supporting or working through social protection mechanisms in NGCAs and conflict areas.

- **Data protection**: There are concerns that transitioning humanitarian caseloads to the government needs to factor in several considerations, including: the upholding of international humanitarian law (IHL), particularly with regards to data protection; and high exclusion rates of some of the existing schemes (the GMI has a 33% target accuracy) and systemic exclusion of ethnic minorities. Other KIs report that data protection is of primary concern in border areas, and those closer to the frontline, since there is a growing fear in contested areas/conflict areas that if Russian forces take control, recipients of GoU assistance could be subject to retaliation. However, it is equally important to question whether the alternative of providing aid by international humanitarian groups would be perceived as neutral, given that funding and human resources come mainly from Western countries. **There is still scope for humanitarian organizations to focus their temporary interventions on conflict-affected populations currently excluded by the social protection system**, and those who cannot access benefits due to access constraints. Additional support should be provided to beneficiaries who wish to enrol into existing government social protection schemes (such as legal assistance and support with legal documentation, referral and information sharing); and technical

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38 Humanitarian space is defined as the social, political and security operating environment, which allows for unimpeded access to protection and assistance. See: UNHCR (2010).
39 Some KIs noted that humanitarian agencies initially wanted to develop and maintain an independent capacity for registration in case government social protection programmes collapsed (as had occurred in the Tigray region in Ethiopia) or were not inclusive enough.
40 Areas along the conflict zones.
41 Two reviewers pointed out that delivering all assistance through government-led systems could be risky if there is a dramatic change in the context, and that there is a need for contingency planning.
42 Several KIs have flagged that not all beneficiaries are willing to share their data with the Ukrainian government and that some organizations did not introduce this option in their consent form.
43 One reviewer pointed out that there is a need for a clear gap analysis of existing social protection systems to be able to do that.
support for the government to expand and/or create programmes to assist to those affected by the recent shocks.

• **Timely discussions with the government:** Some argue that there was an intent to coordinate with the government system from the beginning, but this did not materialize in a timely manner. As UNICEF pointed out, there remain legal and fiduciary barriers for humanitarians to integrate with the GoU system. This is a challenge found in other countries where humanitarian entities aim to use existing systems for rapid response. These barriers include: strict legislation around data protection; lack of consent from beneficiaries to share their data; outdated beneficiary data; lack of policy or shock responsive mechanisms and emergency response SOPs; and the ability to earmark or ringfence funding for specific social protection programmes. Although piggybacking on existing social protection schemes could have been a much faster option to deliver assistance, the largest organizations resorted to setting up parallel registration and disbursement mechanisms. In addition, while UN agencies and the Red Cross were able to sign MoUs with the government, other international organizations faced significant challenges doing so.

**Lack of a common approach**

‘Everyone knows it’s the right thing to do, but no one knows what are the steps that need to be taken agency or sector wide.’

Finding a common denominator and defining a vision to integrate humanitarian cash with social protection in Ukraine is a complex exercise. One the one hand, Ukraine has a complex social protection system, with approximately 230 schemes with different eligibility criteria. In addition, there is an array of options available, from alignment to piggybacking and partial to full integration. The overall perception is that to date there is no common understanding of what linkages entail, and it means different things to different agencies. KIs argued that establishing linkages is as fragmented as the response itself, with some agencies pursuing bilateral discussions with the government in order to achieve better results, to the detriment of presenting the government with a shared strategic vision.

While some KIs point towards a general lack of capacity and understanding of the social protection systems in the humanitarian sector, others argue that there is a lack of political will to find common grounds for collaboration efforts, given that several agencies already have their own bilateral agreements with the government. One reviewer also noted the risk of development actors focusing solely on ensuring that state systems and programmes are running as designed, rather than revising and adapting to the needs of the conflict-affected populations and the need to make systems more shock responsive.

While most agencies are at a different point on the continuum in terms of coordination with social protection systems, there has been little collaboration between humanitarian actors, which often have different interpretations of what linkages mean. To ensure the humanitarian sector builds linkages beyond the alignment stage, **there is a need for a common vision and commitment towards transition to**

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44 It is unclear which other organizations have tried coordinating with the government from the onset of the crisis.
45 The MoUs facilitated the work of agencies, including referral of beneficiary lists, registration and data collection, etc. Some of the humanitarian programmes were ratified by law.
integration with social protection systems in government-controlled areas, and parallel and/or piggybacking in NGCAs.

**Recommendations**

**Leadership and Coordination**

- Based on the discussions above, the HCT should develop an overall strategy to integrate humanitarian action with social protection schemes (which may include in-kind humanitarian response), defining the common vision and clear roadmap on social protection linkages to ensure there is a transition of certain caseloads, while continuing with direct delivery where appropriate, and as outlined in this paper. The strategy should also include a menu of options for agencies to top-up different social benefits or enhance coverage of different programmes, or strengthen different elements of the system, including better shock responsiveness.

- The Humanitarian Coordinator/Resident Coordinator (HC/RC) has reportedly proposed a forum, with the World Bank and UNICEF leading the engagement with the government. This *platform should enable high-level coordination between donors, the government, humanitarian, and development actors* to analyse gaps. This platform should draft a joint workplan outlining the roles of respective actors and expected timeline for addressing the gaps. Understanding the expectations from the GoU in terms of integration and complementarity with the social protection systems is critical to the effectiveness of the platform.

  - The facilitators of this ‘nexus’ forum should have an understanding of both humanitarian and development assistance in order to serve as an intermediary between the main groups.

  - The HC/RC should mandate the most appropriate coordination body (e.g., the CWG) for the technical and operational coordination, critical to avoid overlaps and ensure complementarity between humanitarian aid and social protection assistance. The mandated body should map existing cash-based social benefits (and if possible social assistance services) with special emphasis on understanding the different eligibility criteria.

- The *CWG should develop a common transition plan* and agree with all actors on potential entry points, such as the targeting modality, transfer values, horizontal and/or vertical complementarity, etc.

  - The CWG should adjust the level of discussions in each of the different coordination mechanisms. Task teams should be mostly technical and with short-term concrete specific objectives. Since issues on linking cash with social protection affect most of the current Task Teams, consider transforming it into a sub-working group that could discuss long-term plans for the transition. The social protection Task Team should be mostly dedicated to alignment and harmonization in the humanitarian sector. There are a lot of issues that will still require

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46 With the caveat that actors might still want to consider how to treat cases of individuals in need who are unwilling to share their data with the GoU, and those that are being left out of social protection mechanisms and are in need of humanitarian support.

47 One KI has argued that humanitarian actors need an 18–24-month detailed handover strategy with a clear donor ask. According to the KI, having a clear roadmap will be more appealing to both humanitarian and development donors.
developing at the Task Team level, such as transfer values, data sharing and data governance, systems interoperability, and duplication with the government.

• The CWG should bring expertise from other contexts that could enhance understanding of how to work with social protection schemes and build on existing frameworks and guidance, such as the CALP, OCHA, UNICEF tip sheet on the topic. Contextual knowledge can be enhanced by creating a space for local responders to engage meaningfully in the conversation, especially the NGOs that have been delivering social assistance services as part of social protection.

**Humanitarian response in government-controlled areas**

- Humanitarian agencies will have to rethink their current implementation approach in view of an expected increase of development funding and a reduction in humanitarian funding. Development actors should harness humanitarians’ experience to enable large-scale government schemes to be more adaptive and inclusive, including the IDP programme already running from 2014.
- Humanitarian actors should refocus their operations, from running parallel MPC programmes for IDPs in accessible areas under government control, to refocus their efforts to connect those left out of social protection mechanisms, such as the digitally illiterate, young parents, pre-pensioners, ethnic minorities, etc., to relevant programmes.
- In addition, humanitarians should consider piggybacking on the state-led IDP programme with a top-up. Since the government IDP programme is intended as a housing subsidy, the humanitarian actors could top up transfers with the remaining MEB value (currently the transfer value is harmonized with the state-led IDP response). This approach will further limit duplication between the humanitarian sector and government schemes and consolidate the registration process. To fully align with the IDP state programme, humanitarian organizations should align the duration of the support from three to six months.
- Humanitarian actors should consider a potential referral/handover of caseloads to different social protection programmes, including social services that are appropriate for addressing chronic needs. This will require a long-term engagement framework that addresses key issues such as: obtaining consent of recipients to share their data, DSAs, clarifying targeting and institutional readiness, etc. Consider integrating a light case management approach to ensure recipients are properly transitioned into the appropriate government social protection schemes and social services, if they do not benefit already. Such ‘handover’ of caseloads could take significant time to materialize, based on the experience from other contexts.

**Humanitarian response in non-government-controlled areas**

- A different, more independent approach for humanitarian cash actors is needed for NGCAs. There are political complexities of operating through GoU systems in Russian-occupied areas, and direct delivery is largely preferred among key informants. While this may limit the feasibility of more far-reaching social protection coordination, other options such as ‘piggybacking’ could still be considered with thorough risk assessments to ensure that recipients and/or targeted communities would not experience protection issues as a result of accessing GoU assistance.

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49 One reviewer pointed out that a large part of the population (approximately 50%) is already registered in government systems and receiving a variety of social benefits. The researchers could not verify this figure.
• There could be a useful division of labour between humanitarian organizations willing to work in more risky areas with different approaches and those investing in alignment and linkages with social protection programming in government-controlled areas.

Targeting
• Targeting methodologies need to be developed, to align with and complement GoU’s approach, combining both categorical and means-tested criteria. As discussed in the first learning paper, this will be a key entry point to progressing discussions on social protection programs but is currently one of the weakest points of current humanitarian programmes. A more granular needs assessment and analysis of vulnerabilities is required to effectively target humanitarian assistance.

Donors
• Humanitarian and development donors should develop a common financing strategy that outlines the scope and duration of both humanitarian and development funding. Development donors are better suited to finance the state-run IDP programme, whilst humanitarian donors should support organizations with a complementary approach to the government, focusing on the most vulnerable and those who are excluded from social protection programming or face protection issues in accessing them. Longer-term technical and financial commitments should be secured from donors.
• Better sequencing of the humanitarian and development funding is a key factor if the alignment and transition to social protection schemes is to succeed. There should be better coordination and planning between the humanitarian and development wings of institutional donors to increase predictability on the nexus, development and bilateral funding pipeline.
• Humanitarian donors should adopt a ‘why not social protection?’ approach to humanitarian aid in government-controlled areas of Ukraine.

Lessons learnt from other contexts

Based on the case studies of aligning humanitarian cash and social protection in Ethiopia, Iraq, and Turkey, all countries which have hosted large conflict-affected populations, there are important lessons to consider in the Ukraine context:

• Government involvement is essential and aid actors should be proactive in engaging representatives in coordination. A strong mediator from the development sector and a donor for its convening power are important elements in coordinating the diverse actors needed in these discussions.
• Donor support is extremely important, and experience from other contexts has shown that having an actor that understands the humanitarian sector and is already working with state institutions can facilitate the interaction, find points of convergence, and enable trust-building among parties.

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51 Current humanitarian programmes use status-based targeting or blanket coverage for all IDPs.
52 https://transfer.cpc.unc.edu/countries/ethiopia/
54 CALP (2021).
• Clear donor contributions to fund and support transitions beyond conventional and short-term humanitarian funding cycles are required.

• Consolidation and scaling of the humanitarian cash response provides a solid foundation to enable linkages to social protection. Humanitarian actors in Ukraine have an early awareness yet have yet to achieve harmonization across cash programmes and establish data interoperability with government programmes. Achieving this will be complex, due to a general aversion from the humanitarian sector to share data with governments.56

• In the process of coordinating with social protection, actors may act in diverse ways while pursuing a shared objective. The goal of harmonization is to maximize efficiency using standardized tools and methods while ensuring complementarity. Not all organizations should coordinate with social protection at the same time or in the same way, as examples from Turkey have shown that linkages can be made by one or several organizations. Other organizations can deliver short-term cash assistance to those not covered by social protection schemes.

• In the early phases of the partnership between the humanitarian community with the World Bank and the government in Iraq,57 it was crucial to start with a technical discourse, free from common concerns regarding mandates and resources, which frequently derail joint efforts. The coordinated strategy for targeting across the humanitarian sector and convergence with the government’s targeting strategy laid the foundation for transition activities.

• Transition takes time. In Iraq’s case, the overall harmonization of programming and targeting, as well as the consolidation of the cash sector, took four years to complete. Additionally, it took another four years to engage with the World Bank, major donors, and the relevant government ministries to come to an agreement on a strategy to support social protection harmonization.

Key Learnings from Ukraine

• Humanitarians should seek a complementary role and strengthen existing capacities, as opposed to creating parallel systems that require an extensive roadmap for handover. Government institutions are responsible for meeting the needs of their populations, and the GoU has the capacity to manage large-scale social protection programmes, although it lacks sustainable resources (both human and financial).

• International humanitarian funding is often not the appropriate mechanism for social protection systems. Instead, there is a need for a more shock-responsive development funding mechanism that would support social protection systems in a timely manner. There is a more important role for bilateral state-to-state direct budget support58 and international financing institutions, such as the World Bank. Direct funding for the existing social protection system is often a more appropriate tool to support large-scale social protection expansion.

• There is some acknowledgement that the state-run social protection schemes would have delivered faster than most of the humanitarian organizations, which needed approximately three months to set up their cash operations. With a functioning state-run IDP programme in place that had the capacity

56 There are concerns with the app being used for military purposes, such as tagging Russian military sightings: https://www.washingtonpost.com/technology/2022/03/24/ukraine-war-apps-russian-invasion/
58 McCord et al. (2021).
to support new IDPs, there was a missed opportunity to top up the existing IDP programme and piggyback on the existing systems.

- Humanitarian actors are not well equipped to support social protection coordination, as they require lengthy conversations around policy, legal framework, data sharing, and funding mechanisms – which demands time and expertise.
- There are considerable issues around humanitarian principles when working with social protection systems, including risks to impartiality, aid diversion to the military, and data protection, among others.
- The deployment of experts on social protection coordination, working alongside humanitarian organizations, is of value, but needs to be systematized and increased in contexts with mature social protection systems. Data governance and data privacy remains an issue when it comes to integrating humanitarian cash with social protection. Data should only be shared based on informed consent. Registration, targeting and deduplication systems and processes need to consider onward sharing or possible compromising of data through sharing with social protection schemes.
- Humanitarian actors should demonstrate and define their added value in supporting vulnerable households to obtain assistance through the national system. They can do this by, for instance, raising awareness of the current programmes and supporting the application process, focusing on those with low digital literacy, recently displaced populations, minorities or individuals close to the frontline without access to internet.

### Bibliography


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