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REFLECTION PAPER

Operational Alignment of Humanitarian Cash Programming with Ukraine's Social Protection System

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UKRAINE CASH CONSORTIUM



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Glossary

Actual Subsistence Minimum (ASM): Calculated by the Ministry of Social Policy and is based on a basket of approximately 300 different essential items (including food, non-food items, and essential services). The ASM is regularly updated for inflation; therefore, it has constant purchasing power.

Cash Assistance: Unrestricted cash assistance in the form of physical currency or e-cash.

Collaborative Cash Delivery Network (CCD): A global network of NGOs committed to collaborating for improved impacts of humanitarian cash programming. In Ukraine, the CCD has established a Community of Practice whose membership includes 21 CCD/non-CCD agencies. CCD provides support to the Community of Practice members and wider cash community through its Ukraine Response Shared Services Hub (comprised of 4 technical experts specialized in humanitarian cash collaboration, localization, digital and data governance, and social protection) to support and complement member organizations' response efforts to deliver quality, accountable, and inclusive cash and voucher assistance to the Ukraine crisis.

Minimum Expenditure Basket (MEB): Baskets of items and services that fulfil basic needs that can be monetized and are accessible in adequate quality through local markets and services.

Multipurpose Cash Transfer Assistance (MPCA): Transfers (either periodic or one-off) corresponding to the amount of money required to cover, fully or partially, a household's basic and/or recovery needs. The term refers to cash transfers designed to address multiple needs, with the transfer value calculated accordingly. Multipurpose cash values are often indexed to expenditure gaps based on an MEB, or other monetized calculation of the amount required to cover basic needs. All MPC are unrestricted in terms of use as they can be spent as the recipient chooses.

PeReHID Initiative Technical Assistance Facility: A technical assistance collaboration between international donors, United Nations agencies, civil society, and the government of Ukraine, which aims to guide the transition of the humanitarian multipurpose cash assistance caseloads to an inclusive shock-responsive social protection system.

Social Protection (SP): A set of policies and programs aimed at preventing or protecting all people against poverty, vulnerability, and social exclusion throughout their life-course, with a particular emphasis on vulnerable groups.

Shock-Responsive SP: Focuses on how SP systems can be leveraged and adapted to respond to large-scale covariate shocks.

Statutory Subsistence Minimum: Set by law and is not adjusted for inflation. It forms the basis for the calculation of SP benefits.

Task Team 5 (TT5): The Cash Working Group (CWG) established different timebound thematic working groups, or Task Teams, to focus on specific issues and come up with context-based solutions to address these issues. The objective of TT5 was to ensure that humanitarian MPCA in Ukraine complements, links, aligns with, and, where possible, strengthens existing government-led SP systems (active from June 2022 to July 2023).

Ukraine Cash Consortium (UCC): Comprised of Mercy Corps, Norwegian Refugee Council, and People in Need and is funded by USAID/BHA. The program provides MPCA and in-kind assistance to meet emergency basic needs.

Acronyms

CWG	Cash Working Group
CCD	Collaborative Cash Delivery
IDP	Internally Displaced Person
MEB	Minimum Expenditure Basket
M&E	Monitoring and Evaluation
MoSP	Ministry of Social Policy
MoU	Memorandum of Understanding
MPCA	Multi-Purpose Cash Assistance
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
PFU	Pension Fund of Ukraine
SP	Social Protection
TT5	Task Team 5
UAH	Ukrainian Hryvnia
UCC	Ukraine Cash Consortium
UISSS	Unified Information System of the Social Sphere
UN	United Nations
UNICEF	United Nations Children’s Fund
WFP	World Food Programme

1. Introduction

This paper explores the extent to which humanitarian Multipurpose Cash Assistance (MPCA) in Ukraine has been able to leverage different elements of the delivery chain of national social protection (SP) programming. The basis of this paper is the framework developed by Seyfert et al., in their 2019 paper [Unbundled: A Framework for Connecting Safety Nets and Humanitarian Assistance in Refugee Setting](#). Under this framework, humanitarian MPCA happens along a continuum from no integration, to full integration with national SP systems. This continuum happens for each individual element of the delivery chain rather than one single approach applied across all elements.

Significant progress has been made on the Grand Bargain Commitment¹ to shift humanitarian assistance to cash transfer programming, with many operational actors adopting a “cash first” approach ([Metcalfe-Hough, et al., 2021](#)) and accumulating and sharing lessons learned throughout different humanitarian responses.² Leveraging national SP systems to deliver humanitarian cash assistance has not advanced as quickly as the adoption of cash assistance modalities, despite the stated importance of SP systems to achieving the humanitarian-development nexus. As the Ukraine crisis is well into its second year, with no clear sign of abatement, greater coordination is required between humanitarian and development actors, as well as the international community and the government to reduce humanitarian needs, risks and vulnerabilities, as called for in The United Nation’s Office for the Coordination of Humanitarian Affairs’ (OCHA) [New Ways of Working](#) (2017) paper. Such an approach is guided by the “reinforce, do not replace, national and local systems” principle of the Agenda for Humanity Transformation Commitment (Loquercio et al., 2017). This approach is directly related to the localization outcome of the World Humanitarian Summit, which reaffirmed the role of national and local actors in the delivery of assistance (OCHA, 2017).

There are significant similarities between humanitarian cash assistance and SP, but there are also key differences that may impede leveraging the SP system to deliver assistance. Understanding these differences is as important as understanding the context in which linkages could occur. There is, at times, tension between humanitarian principles and leveraging national systems to deliver assistance, especially where the government is party to the conflict.

Leveraging national systems to deliver humanitarian assistance can potentially compromise some humanitarian principles, notably, in the case of Ukraine, neutrality and independence. For instance, neutrality, or not being viewed as supporting one side over another, is critical for humanitarians to safely access areas where active hostilities occur. If humanitarian actors are perceived to be collaborating and aligned with the government, access to non-government-controlled areas may be blocked or humanitarian actors may become targets themselves. This is a concern not only for actors operating in Ukraine but also for their operations in other countries in which the Russian Federation is also present. Issues around independence are also a key concern, particularly around data protection standards. Currently, data is shared by the government via eDopomoga³ through data-sharing agreements with humanitarian actors, with the obligation for humanitarian actors to share beneficiary data with the government. However, individuals may register for humanitarian assistance directly with humanitarian agencies rather than through the government platform due to fears of conscription, and sharing data with the government could raise the risk that it is used for general mobilization efforts rather than SP purposes (coordination, targeting, etc.).

¹ See Grand Bargain website: <https://interagencystandingcommittee.org/grand-bargain>

² See SPIAC-B’s website for updated reports on lessons learnt: <https://socialprotection.org/connect/communities/social-protection-crisis-contexts/spiac-b-working-group-linking-humanitarian>

³ eDopomoga is a digital platform through which the state, humanitarian organizations, and volunteers from all over the world can provide financial support to individuals in Ukraine.

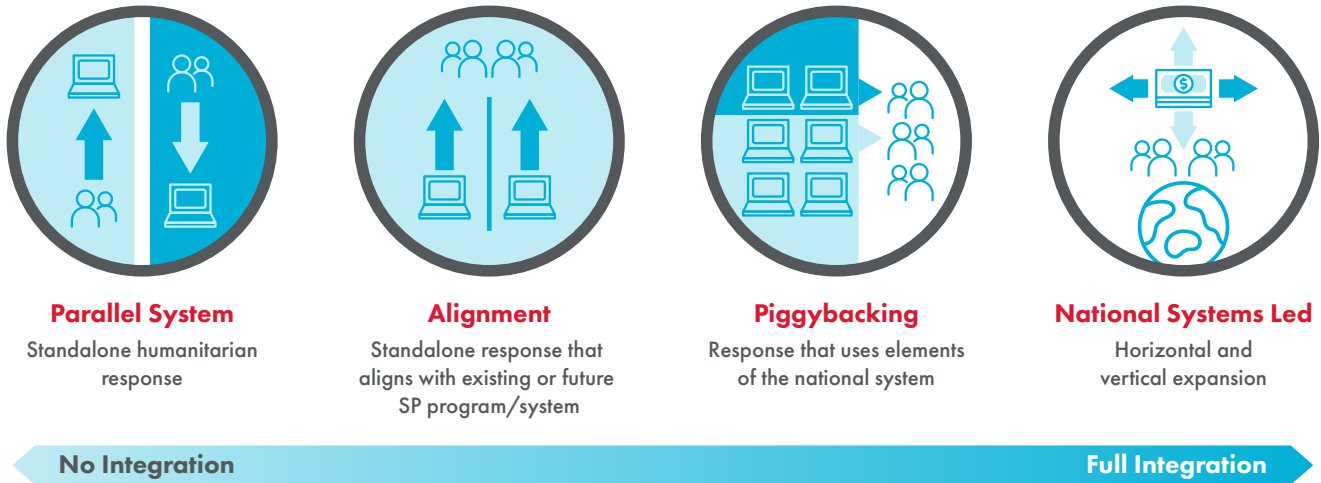
Much attention has been devoted to looking at the role of SP in the “humanitarian-development nexus” in lower-income or fragile contexts with nascent or limited SP systems. This paper focuses on a middle-income context with a robust SP system that provides contributory and non-contributory cash, concessions,⁴ and in-kind programs to address various lifecycle contingencies and poverty. Interestingly, despite the maturity of the SP system in Ukraine, very little of the MPCA response is nationally led or piggybacks on existing systems, with the majority of delivery chain elements designed as standalone components or somewhat aligned with the national system. This may be because of the nature of the emergency. In conflict situations, particularly where the government is party to the conflict, there may be implications for humanitarian principles, notably neutrality, and independence, which can make leveraging the government system less prudent.

This paper analyzes the operational alignment of the response to reflect on the levels of and existing barriers to alignment along the delivery cycle of MPCA and should be read in conjunction with the Collaborative Cash Delivery (CCD) Network/Ukraine Cash Consortium (UCC)’s paper, which presents program design options for humanitarian cash programming aligning to the SP system in Ukraine. That paper includes a more in-depth analysis of the SP system in Ukraine, as well as the humanitarian response.

2. Theory on Operational Alignment

This paper uses the “unbundled” framework Seyfert et al. developed (2019). The framework establishes a more nuanced approach to linking humanitarian cash transfers with SP cash benefits. It unpacks the “delivery chain” for cash assistance into individual components to assess the degree to which humanitarian cash assistance programs leverage the SP system. The degree to which leveraging occurs across a continuum goes from no integration to fully integrated responses (see figure 1). This paper assesses the level of alignment against the definitions for each component and level developed for the “unbundled” paper. Each component is accompanied by a description of a national system-led response based on the definitions put forward in the unbundled paper and adapted for how it might look in the Ukrainian context.

FIGURE 1. CONTINUUM OF DELIVERY APPROACHES FOR SOCIAL ASSISTANCE

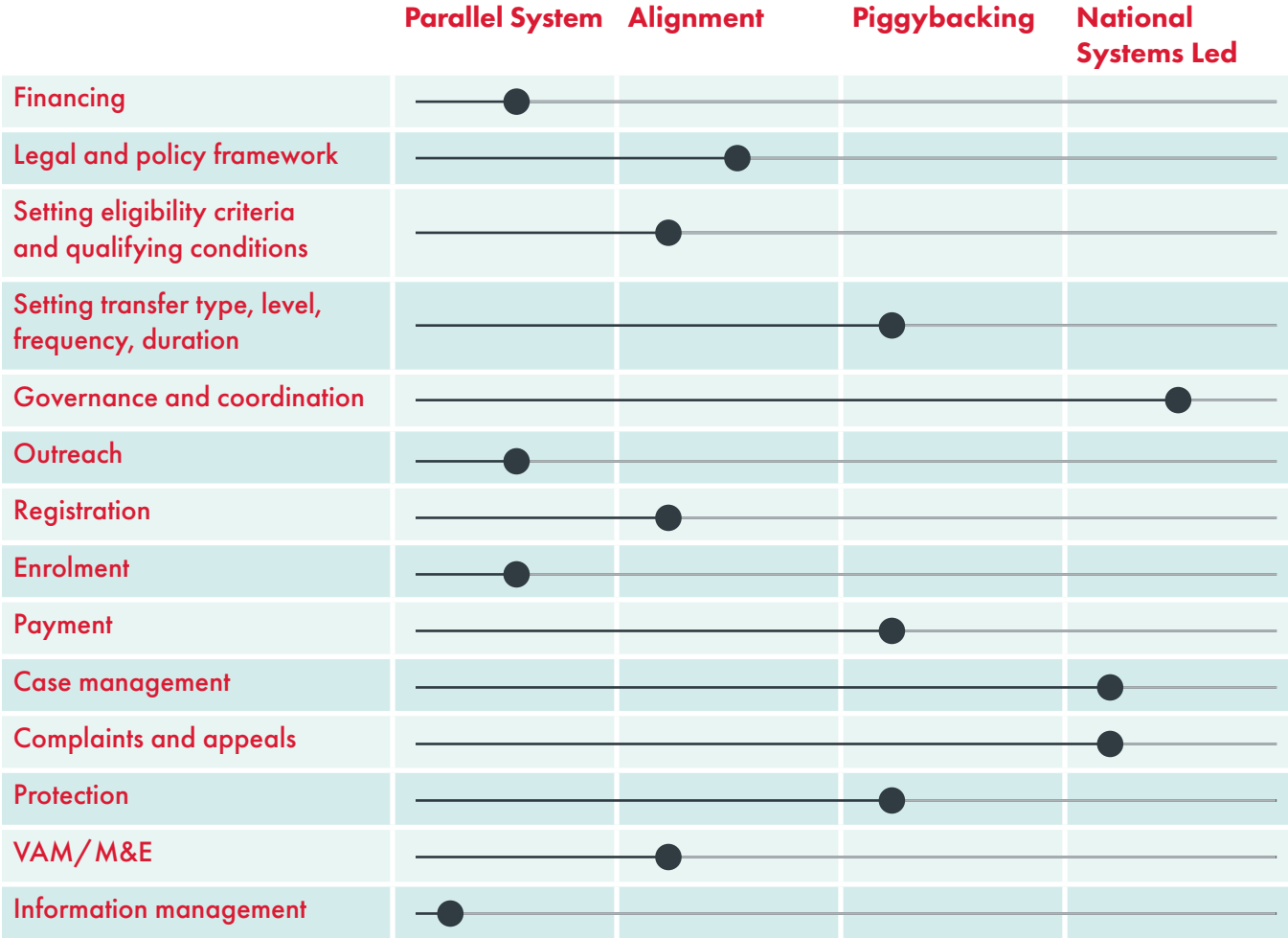


Source: Seyfert et al., 2019.

⁴ Concessions, which include tax exemptions, fee waivers, subsidies, reduce out of pocket expenditures on certain good and services. In Ukraine these are referred to as ‘social privileges.’

Figure 2 provides an illustrative example of how the continuum can be applied across the 14 different components of the delivery chain.

FIGURE 2. FRAMEWORK – SCALE OF ALIGNMENT AMOUNT DELIVERY COMPONENTS



Source: Seyfret et al., 2019.

3. SP and MPCA Landscape in Ukraine

The government of Ukraine operates a comprehensive SP system comprising social insurance, social assistance and social privileges, active labor market programs, and social care services, which provides categorical and means-tested benefits to cover a wide range of lifecycle contingencies and vulnerable groups. This translates into high effective coverage, with nearly three-quarters of the population covered by at least one SP benefit (ILO, 2021). While the role of social privileges, active labor market programs, and social care services are critical to reducing risks and vulnerabilities and essential components to recovery, this paper does not cover them.

The **social insurance** system provides an array of benefits to contributing workers in formal employment and self-employed individuals, including retirement and disability pensions and unemployment, maternity, and work accident insurance. The Pension Fund of Ukraine (PFU) now manages all programs under the social insurance pillar. Around 10.7 million Ukrainians currently, as of April 2023, receive some form of pension through the PFU. Categorical and poverty-targeted social assistance benefits can supplement contributory pensions.



Photo: Mercy Corps

Ukraine operates a complex network of **social assistance** benefits, which include categorical benefits like the childbirth grant, old age social pensions and disability benefits, poverty-targeted benefits like the Guaranteed Minimum Income Program and the Housing and Utilities Subsidies, or categorical plus means-tested programs, like the benefit for single mothers. Before COVID-19 and the 2022 Russian invasion of Ukraine, around 60% of the population received at least one social assistance benefit (World Bank, 2020).

The government of Ukraine has implemented several **shock-responsive SP** measures to address the current crisis. It horizontally expanded the eligibility access of existing programmes, tweaked the design of specific programs to waive recertifications, and enacted new temporary programs with and without humanitarian organizations' assistance. Regarding the latter, the government of Ukraine, through the Ministry of Social Policy (MoSP), provides housing assistance to officially registered internally displaced people (commonly referred to as the IDP Housing Assistance program). This program was introduced in 2022 and replaced the previous IDP subsistence aid program. The government supported 2.3 million IDPs in 2022 through the IDP Housing Assistance program.

The IDP Housing Assistance program provides cash support to "citizens who, due to the war, have lost their homes or were forced to leave their homes and resettle from places where hostilities are taking place or from temporarily occupied territories, as well as to help them adapt to new living conditions" (MoSP, 2023). The IDP Housing Allowance had been a blanket transfer to anyone who was officially displaced and met the eligibility criteria; however, starting September 1, 2023, the eligibility criteria now considers the financial situation of displaced individuals. Those currently receiving benefits who meet the new criteria will be automatically extended for an additional six-month period. Those applying for the first time starting 1 August 2023 will receive six months of support, but certain vulnerable families will be eligible for 12 months.

To complement the IDP Housing Assistance, the international community provides MPCA to Ukrainians affected by the conflict. Multipurpose cash assistance was introduced in March 2022 to support conflict-affected populations to meet their immediate basic needs, including food and hygiene items. MPCA in Ukraine is delivered by over 40 MPCA actors, including United Nations (UN) agencies, national and international NGOs, and the International Red Cross and Red Crescent Movement, reaching 5.96 million people with US\$1.21 billion at the end of 2022 (CWG, 2023). An estimated 31 percent of recipients have been women (18-59), 16 percent are men (ages 18-59), 26 percent are children (0-18 years), 23 percent are men and women over the age of 60 years, and 7 percent are persons with disabilities (CWG, 2023). The MPCA response in Ukraine is the largest humanitarian cash assistance response in history (HRP, 2023). There are two categories of MPCA, rapid MPCA and emergency MPCA, both of which adhere to the same transfer value and duration but differ in **eligibility criteria** as guided by the Cash Working Group (CWG).



1. **Rapid MPCA** aims to provide a minimum package of immediate and critical life-saving assistance to newly displaced households, households residing in areas of armed conflict, and households affected by sudden shelling to respond to arising immediate needs. Rapid MPCA accounts for 63 percent of planned multipurpose cash response in Ukraine (HRP, 2023).
2. **Emergency MPCA** aims to assist particularly vulnerable conflict-affected families and IDPs to meet their basic needs and to avoid reverting to negative coping mechanisms. Emergency MPCA accounts for 37 percent of planned multipurpose cash response in Ukraine (HRP, 2023).

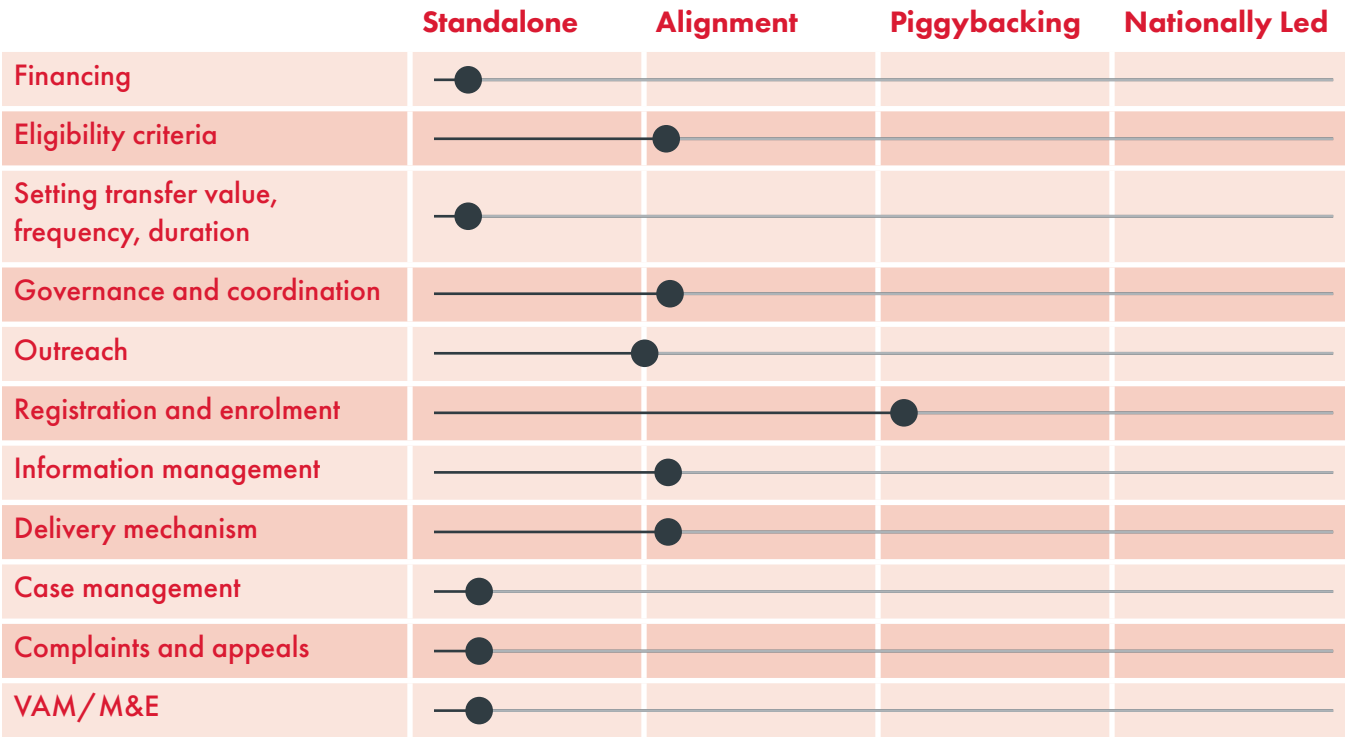
Given the similarities between the programs, this paper considers the extent to which the MPCA leverages the delivery chain of the government's IDP Housing Assistance program.

For a more in-depth analysis of the SP system in Ukraine and the humanitarian response, please consult [CCD/UCC's previous paper](#) presenting program design options for humanitarian cash programming aligning with the SP system in Ukraine.

4. Assessment of Operational Alignment of MPCA in Ukraine

To determine the level of alignment within each component of the delivery chain, this paper relies on secondary and primary sources reporting on the response, as well as firsthand accounts from humanitarian organizations gathered on July 4, 2023, when the CCD and the UCC facilitated a workshop on the alignment between humanitarian MPCA and the national SP system. One workshop exercise identified areas of convergence and divergence between the national IDP Housing Assistance program and the humanitarian MPCA. The workshop considered a subset of the 14 components of the delivery chain outlined in the Unbundled paper. Figure 3 provides an overview of the findings from the assessment, which are elaborated in the following sections.

FIGURE 3. UKRAINE RESPONSE – LEVEL OF OPERATIONAL ALIGNMENT



Source: Authors' adaptation of the framework in Seyfret et al., 2019.

4.1. Financing

Nationally Led Definition: Donors provide budget support directly to national governments for the operation of SP programs, including the scale-up of existing programs or the introduction of new initiatives.

In the case of Ukraine, humanitarian donors would, for example, provide on-budget support, allowing the IDP Housing Assistance program to scale up to accommodate the increased demand.

The Ukrainian government is responsible for the humanitarian needs of their conflict-affected citizens through different SP programs, especially through the IDP Housing Assistance, allocations in the national budget funded by government revenue, and direct budget support from international partners, such as the World Bank. However, the needs of the conflict-affected population outstrip the budget's ability to respond. While international donors have provided development funding through budget support for the continuous operation of routine government programs and innovations within the SP system,⁵ most humanitarian funding has been directed outside of the government structures to UN Agencies and NGOs to provide humanitarian MPCA, both rapid and emergency, to conflict-affected Ukrainians.

Reasons for not directly funding SP programs include humanitarian donors raising concerns about the government's ability to ringfence budget support intended for humanitarian cash response and the inability to verify recipients' eligibility.

The common belief of the inability to run verification processes on potential recipients identified by the government stems from an enforced data protection law requiring explicit consent from an individual before their sensitive personal data (classified as "confidential information" under the law)⁶ is shared with a third party (i.e., humanitarian organizations).⁷ As participants explained during the workshop, if a person does not provide explicit consent for a specific humanitarian agency to process their sensitive data when they signed up for a government SP program, a third party cannot access this person's data to determine eligibility. This means that a list of government assistance recipients or lists of vulnerable individuals cannot be shared with humanitarian organizations. However, it is clear from current practices that exceptions were found in accordance with the law.

⁵ Few humanitarian organizations have directly funded the government-led social protection system. WFP and Corus International, for instance, have provided technical and financial assistance to the Ministry of Social Policy to upgrade administrative systems to make them more responsive to the current crisis (Byrnes, 2022b). The Ministry of Social Policy has requested additional support to improve the eDopomoga platform to make it more fit for purpose. Providing financial and technical support to the Ministry of Social Policy may allow for more coordination with and input by humanitarian actors to influence the design of administrative components so they are more fit for purpose.

⁶ The Laws of Ukraine "On Information" No. 2657-XII dated October 2, 1992, and "On Access to Public Information" No. 2939-VI, dated January 13, 2011.

⁷ Existing data protection laws in Ukraine: The key legislative act regulating data protection in Ukraine is the Law of Ukraine "On Personal Data Protection" No. 2297-VI, dated June 1, 2010 (the "Data Protection Law"). This law outlines principles and requirements for processing personal data, including lawful grounds for processing, data subjects' rights, and obligations of data controllers and processors. As an EU candidate, Ukraine has an obligation to align its legislation with that of the European Union. Ukraine has already adopted several EU Directives and Regulations. Thus, a Draft Law No. 8153, dated October 25, 2022, was submitted to the Parliament of Ukraine to harmonize the Data Protection Law with the provisions of the European General Data Protection Regulation (the "GDPR") and of the Amending Protocol to the Convention dated 2018. The draft law envisages the transfer of personal data to the foreign states or international organization, which would alleviate future concerns around verification processes by international organizations.

Indeed, the law permits data controllers to entrust personal data processing to a third party with a written **data-sharing agreement** and only in the **public interests of “national security, economic well-being, and human rights.”**⁸ Therefore, with the right data sharing agreements (laying out commitments and data protection procedures) and an identified exception, humanitarian organizations should be able to directly finance government SP programs while still running verification processes on those their financing directly supports.

The World Food Programme (WFP), in August 2023, launched a program in collaboration with the MoSP and the PFU through which it transfers complementary cash payments to pensioners in regions most affected by war, who receive a pension less than 3,000 Ukrainian Hryvnia (UAH) (US\$81), and who have not received other forms of government cash transfers (e.g., IDP housing assistance).¹¹ The government generates the lists of recipients with the amount of payment due (the difference between their pension income and 3,000 UAH) as anonymized data with linked bank accounts. WFP then, without administrating its own verification procedures, directly issues monthly payments to the bank accounts provided by the government in which pensioners are already receiving their pensions. Individuals will be assigned this top-up without having to apply or register. The program will tentatively first run for four months and target approximately 260,000 pensioners (WFP, 2023).

Nevertheless, as the previously stated exception of public interests is preceded by the ambiguous provision requiring exceptions be determined by law, data holders may still choose to err on the side of caution and refuse to share data until a clearer procedural law entitles international organizations to obtain the restricted information for the functions of providing humanitarian support.⁹ In order to address this obstacle, there is currently a draft law legalising specific instances and laying out the specific procedures for the transfer of personal data to foreign states or international organizations.¹⁰ This draft law would enable international organizations to undergo their own verification procedures of SP recipients, and subsequently open the door to further possibilities of direct financing of government programs by international organizations.

The majority of humanitarian actors are only comfortable piggybacking onto government lists of recipients if they are able to access the list and perform their own verification procedures. This is in line with the humanitarian principle of impartiality, which is concerned with corruption and diversion of humanitarian funds. However, there are some emerging examples of humanitarian organizations piggybacking on government lists to provide top-ups to those already registered in SP programs.



Photos: Mercy Corps

⁸ Ibid.

⁹ As seen under recent taxation and procedural laws entitling relevant authorities to obtain restrict information to perform their functions.

¹⁰ Draft Law No. 8153, dated October 25, 2022, was submitted to the Parliament of Ukraine to harmonize the Data Protection Law with the provisions of the European General Data Protection Regulation (the “GDPR”) and of the Amending Protocol to the Convention dated 2018.

¹¹ For reference, the social assistance pension provides individuals who have reached retirement age and who are not entitled to a social insurance pension with a monthly transfer of 30% of the statutory subsistence minimum for persons who have lost their ability to work, amounting to 627.9 UAH/month.

4.2. Registration and Enrollment

Registration

Nationally Led Definition: Applications for humanitarian assistance are made via existing registration systems or the government introduces a new registration process for emergency cash programs. In the case of Ukraine, registration for all humanitarian assistance programs would be done through the eDopomoga or Diia¹² platforms.

Enrollment

Nationally Led Definition: Eligibility information is verified through government systems. Those who qualify for assistance are automatically enrolled and notified through government processes. In Ukraine, eligibility for assistance would be determined by cross-checking information in eDopomoga against information in the Unified Information System of the Social Sphere (UISSS).

There is no one set approach to registration and enrollment for emergency cash assistance in Ukraine. Ukrainians who are interested in registering for the IDP Housing Assistance Program can do so using the Diia Platform or they can register in person. During the initial stages of the response, despite the concerns around data privacy legislation (as discussed in the financing chapter), the government was able to share the registration lists with only certain humanitarian actors, specifically the UN and Red Cross Movement, for cash assistance (Byrnes, 2022b).

An example includes the joint project between the International Committee of the Red Cross, the Ukrainian Red Cross Society, and the government of Ukraine, implemented on April 26, 2022, through Decree №487, setting the framework for financial aid to specific groups of vulnerable populations, including IDPs. Under the project, the MoSP compiles and transmits a list of recipients of mutually agreed upon vulnerable categories to the Mission of the International Committee of the Red Cross in Ukraine or the Ukrainian Red Cross Society. Information about these recipients is contained in the information databases of the MoSP, in particular the Unified Information Database on Internally Displaced Persons, or persons who have applied for assistance by filling out a form on the information platform “eDopomoga” (edopomoga.gov.ua). The Red Cross agencies then run the list of recipients through their own internal verification process and issue one monthly payment of 2,500 UAH per person (with the possibility of extension). The payments under this scheme will not affect entitlement to other government or non-government benefits and programs.¹³

¹² Diia is a government platform launched in 2020 to enable Ukrainian citizens to use digital documents on their smartphones and access more than 80 governmental services (including registration for most social protection programs).

¹³ Cabinet of Ministers of Ukraine Resolution, April 26, 2022. No. 487. On the implementation of a joint project with the Mission of the International Committee of the Red Cross in Ukraine and the Ukrainian Red Cross Society on additional measures for social support of certain categories of the population. Retrieved from: <https://zakon.rada.gov.ua/laws/show/487-2022-%D0%BF#Text>

However, as bilateral data-sharing agreements with each humanitarian actor and for each proposed project were probably too cumbersome and ineffective given the scale of the response, the government introduced another option that would allow personal information to be shared with other cash actors by creating the eDopomoga platform. The eDopomoga platform is comprised of three components: the component on State Assistance, which provides information on how to access different government benefits available for conflict-affected households and how to access the support; the component on Volunteer Assistance, which allows conflict-affected households to request peer-to-peer support from global and national volunteers; and the component on assistance from the international community. The third component enables the government to share personal data with a wider pool of humanitarian cash actors. Initially, eDopomoga was used by several cash actors (up to fourteen as of May 2023, paying about 3.9 million people) because it allowed them to piggyback onto the government system and also allowed them to register people in areas they could not access.

However, cash actors have encountered challenges with using the registration lists from eDopomoga (leaving 8.91 million applicants [or 6.7 million applications] unassisted through the platform), including:

- › eDopomoga asked for basic information about the households but did not ask specific questions on vulnerabilities, limiting cash actors' ability to apply their vulnerability criteria, while actors experienced increased demand to be more targeted and refine caseloads as the situation evolved.
- › eDopomoga is not updated and the system has been closed since October 2022 following a large volume of applications; 10.2 million applications representing 12.8 million applicants. This prevents actors from recognizing where there are new needs, including needs linked to displacements following late 2022 frontline movements.
- › Practitioners noted the need for household registration data to be up to date and for additional verification procedures to ensure data accuracy. Humanitarian actors informed MoSP in May 2022 of their minimum requirements for household data (name, tax ID, phone number, IBAN, gender, geographical location, age, vulnerability criteria), criteria which is not always present, raising payment challenges linked to data quality.
- › eDopomoga information is at the household level, which could lead to duplication as other household members could create separate profiles.
- › Potential recipients refused to additionally fill out the organization's application form as they deemed having registered on eDopomoga to be enough.
- › Implementing standalone registration and enrollment allows humanitarian cash actors to maintain humanitarian principles of impartiality and neutrality, especially in NGCA or newly liberated areas.
- › Practitioners also noted that eDopomoga might not capture all conflict-affected individuals, and they have concerns over "people who are left behind." They raised concerns over the number of IDPs compared to the number of those who have obtained official IDP certifications, individuals who may be afraid to register, especially men between the age of 18-59 who may not register due to fears over conscription, or those who are residing in conflict-affected areas who have not left.

These challenges have meant some cash actors have moved to standalone registration procedures after initially using eDopomoga. There are ongoing discussions between the government and CWG to resolve the eDopomoga challenges so it is more operational for cash actors.

TABLE 1. REGISTRATION AND ENROLMENT APPROACHES

Piggybacking/Alignment	Standalone
Memorandum of understanding (MoU) signed between UN agencies, humanitarian cash actors, and the government to use eDopomoga lists with additional standalone verification procedures undertaken by cash actors to support enrollment.	Humanitarian cash actors that have not signed MoUs with the government to use eDopomoga instead run parallel registration processes, in some cases through face-to-face registration. In other cases, organizations utilize online registration. Cash actors run their own verification procedures to support enrollment.

There are a few examples of organizations that worked efficiently with local authorities to share lists of potential beneficiaries. After signing an MoU between the local authorities and the organization, the local authority was able to share the list, which the organization would then process through their own verification procedures. There were also some examples of organizations using the local authority premise to conduct face-to-face registrations (Ground Truth Solutions, 2023). However, such collaborations are not widespread. Enrollment procedures are largely standalone, with organizations preferring to do their own verification procedures rather than relying on government sources. For example, most humanitarian organizations did not require (or accept) the IDP certificate to enroll individuals into an IDP-specific program or a government-issued disability certificate to enroll individuals into a disability-specific cash program.

4.3. Information Management

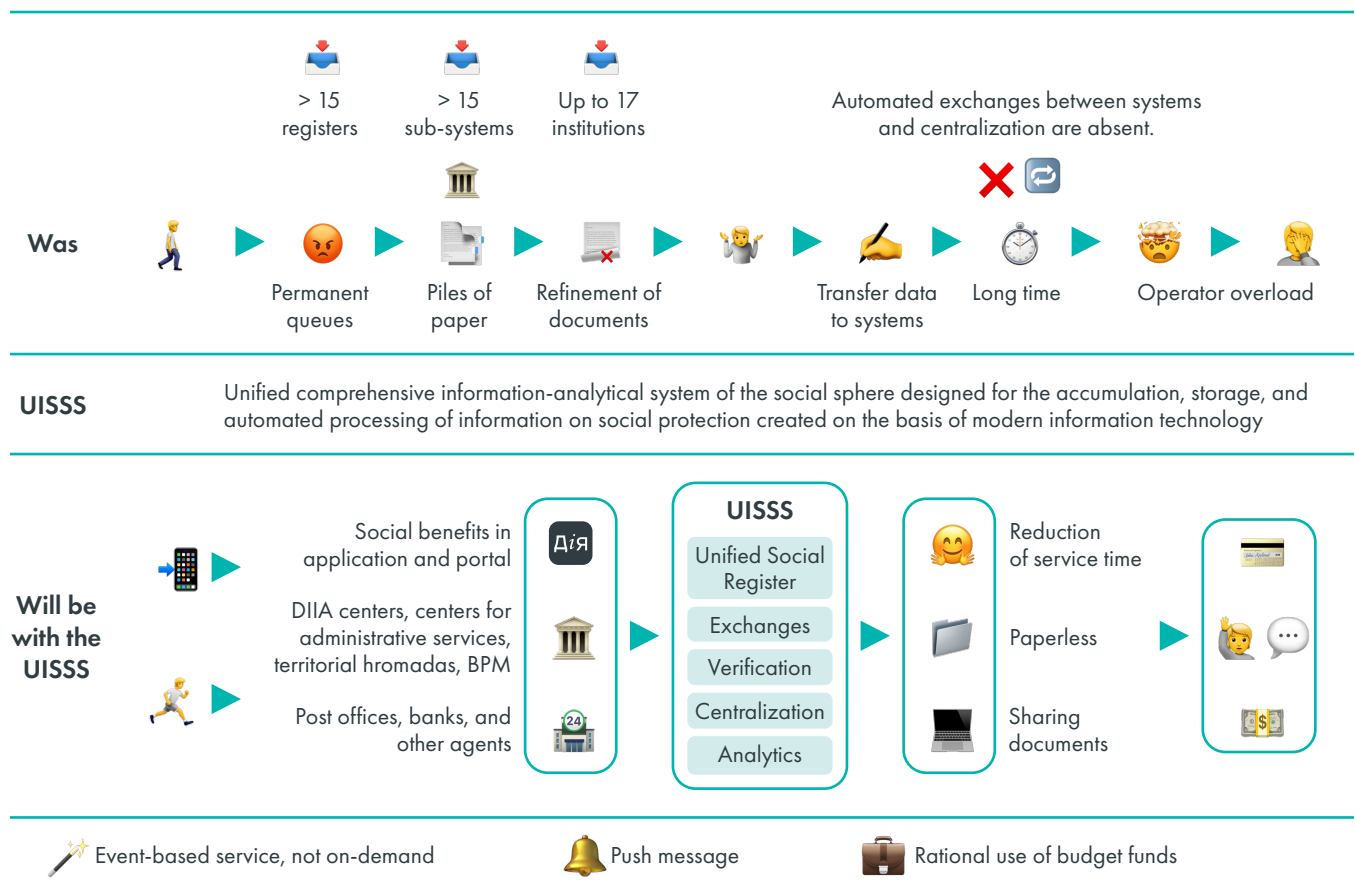
Nationally Led Definition: The government is the primary custodian of beneficiary data and is responsible for storing and sharing data in line with national data protection laws. In Ukraine, all beneficiary information would be stored in the UISSS or in another government-managed database. Sharing data with NGOs would require informed consent in line with current legislation.

The government of Ukraine is rolling out its UISSS to serve as a comprehensive information system for social benefits. The reform had already been planned before the start of the conflict but has since been accelerated with the technical and financial support of international donors. The UISSS serves as a registry of SP recipients: it contains the personal information of everyone who is entitled to and is currently or has previously received any social benefits programs. It also acts as a beneficiary operations management system in that it will verify and validate data, make and track payments, and be used for program monitoring. The UISSS aims to ensure a centralized system replacing and optimizing the other outdated operating systems and registers (Koshelenko, 2022). As of August 2023, the UISSS unites 40 registers and 16 subsystems (Medirent, 2023). The UISSS is linked to the Diia platform, which allows Ukrainians to easily apply for different SP programs.

The ambition of the UISSS, as expressed by the Deputy Minister of Social Policy for Digital Transformation, is also, in the future, “to provide an opportunity to implement a reform to introduce universal social assistance, which will be easy to administer and which will be more socially fair than the numerous types of assistance that the state pays out now” (Koshelenko, 2022). Early in the response, as the UISSS was still undergoing key developments, Building Blocks was identified as the platform for conducting deduplication. As of September 14, 2023, MoSP announced that following a successful pilot in the Rivne and Zhytomyr regions, where the UISSS is successfully assigning, calculating, and paying assistance to six SP programs,¹⁴ the UISSS is actively implemented throughout the entire territory of Ukraine (MoSP, September 2023).

Because Ukraine’s robust data privacy laws govern beneficiary data contained in the UISSS and other SP databases and, as such, cannot be shared with humanitarian actors or used by them to verify application data, the government launched the eDopomoga platform in 2022 to bridge that obstacle. Linking the eDopomoga platform to the UISSS allows the government to verify, on behalf of humanitarian organizations, applicants’ updated phone numbers, IBAN bank accounts for payments, and if their personal information (related to income and other social status) correspond to the information available in the state registers.

FIGURE 4. UISSS DEVELOPMENT



Source: Koshelenko, 2022.

¹⁴ Assistance for children under guardianship; child support for single mothers; assistance in adopting a child; assistance to low-income families; assistance to persons with disabilities and children with disabilities; assistance to persons caring for a sick child.

All cash actors maintain their own information management systems with the information of their enrolled beneficiaries. Cash actors that have signed an MoU with MoSP to receive information from the government information system, in this case through eDopomoga, have an obligation to provide MoSP with the list of recipients who have received assistance and those who have not. This information is then fed back into eDopomoga. Every applicant can access their personal application to check on its status, e.g., whether they have received assistance, or whether their data has been handed over to other agency and the decision on their assistance is pending (VisitUkraine.today, 2022). However, information cash assistance provided by organizations who have not signed an MoU with MoSP will not be shared with the government or available to applicants.

There are ongoing discussions on how to reform eDopomoga to make it more fit for purpose for humanitarian actors. However, the MoSP is facing constraints related to funding and human resources. UN agencies and donors have provided financial and technical support for systems improvements. However, it would be worth exploring if INGOs could provide funding and technical support for systems reforms.

Currently, as organizations are using different methods to register beneficiaries, with some using eDopomoga and some using standalone approaches, data on beneficiaries are not stored in one common location, which may increase the likelihood of recipients receiving assistance from multiple agencies. To reduce duplication, humanitarian cash actors are using Building Blocks, a product built by WFP that provides a blockchain network allowing organizations to deduplicate recipients of aid using the national government tax IDs. It is important to note that Building Blocks only contains the tax IDs of beneficiaries and no other personal information. Building Blocks was identified and continues to be the platform for deduplication. There are concerns that moving to a government system, either DIIA or UISSS, could jeopardize the humanization principle of independence as organizations would have to transfer all beneficiary data to government systems.

4.4. Eligibility Criteria

Nationally Led Definition: Eligibility criteria are determined by the national systems, based either on existing SP programs or new eligibility criteria set by the government.

In the case of Ukraine, humanitarian MPCA actors would adopt the same criteria as the IDP Housing Assistance program or other SP programs.

The eligibility criteria for the rapid MPCA were set by the CWG but are aligned with the overall categorization of the IDP Housing Assistance program, despite differences with the government's criteria and definition of an IDP. During the July 2023 workshop, practitioners expressed the reason for not aligning fully with the government's definition of an IDP¹⁵ and other targeting criteria according to other SP programs due to the inability to assess vulnerabilities in the fast-paced nature of the distribution of rapid MPCA. Rapid

MPCA is provided when a complete vulnerability assessment is impossible. Secondly, for emergency non-rapid MPCA, practitioners explained the preference of not aligning with government definitions and criteria due to the prioritization of humanitarian principles, the risk of leaving people behind who did not fall under the government's criteria, and the absence of clear guidance on government programs and their eligibility criteria. Moreover, the IDP definition was not well communicated by the government nor required by the government for humanitarian organizations to apply to their responses. Additionally, while some humanitarian cash actors provide MPCA according to the CWG's broad eligibility criteria, several organizations widened the scope of vulnerabilities, time, and other criteria to cover a wider range of people (see OCHA's Information for Affected Population and the CWG's 2022 Targeting Framework for additional details).

¹⁵ Cabinet of Ministers of Ukraine Resolution October 1, 2014, No. 509. Procedure for the registration and issuance of a certificate of registration of an internally displaced person. Retrieved from: <https://zakon.rada.gov.ua/laws/show/509-2014-%D0%BF#n9>

TABLE 2. ELIGIBILITY CRITERIA BY PROGRAM

IDP Housing Assistance (government)	Rapid MPCA (CWG criteria)	Emergency MPCA (CWG criteria)¹⁶
<p>Individuals who are officially registered as IDPs. However, as of September 1, 2023, the financial situation of households will be considered. Households meeting the following conditions will not be eligible for assistance: 1) purchased a new vehicle; 2) purchase of a house, apartment, or land of more than 100,000 UAH; 3) funds in the total amount of more than 100,000 UAH in a deposit bank account; 4) purchased foreign currency, as well as banking deposits for a total amount of more than 100,000 UAH; 5) owning housing located in territories other than those where active (possible) hostilities are taking place or which are occupied, if such housing has an area of more than 13.65 m² per family member.</p> <p>A person can only officially be an IDP if registered as a resident before February 24, 2023 of a location on the list of territorial communities located in the area of military (combat) actions or under temporary occupation environment (blocking). This list changes regularly in line with conflict developments. When the list changes and locations are removed, citizens automatically lose their IDP status on the basis that their residence is safe to return. This information is communicated to Ukrainian citizens on the MoSP website and through other communication channels.</p> <p>Additionally, certain vulnerable households will be eligible for assistance for a longer duration. These include children with disabilities; persons caring for a person with a disability; persons of retirement age; families with three or more children under the age of 18; minors and young children who arrived unaccompanied by a legal representative; and if the total income per family member does not exceed four subsistence minimums.</p>	<p>Newly displaced households (within the last 30 days), households residing in areas of armed conflict (15 kilometers or fewer from the frontlines or territories beyond government control), and households affected by sudden shelling.</p> <p>The qualification of displaced households was not held to the geographical areas identified by the government to qualify for the IDP certificate.</p>	<p>Households displaced for more than 30 days or households in areas when armed conflict has occurred within the last four months. Households have an income of less than 5,400 UAH per person and have at least one vulnerability criteria, including households with multiple (three+) children, households with persons with disabilities, single-headed households, households with pregnant and breastfeeding women, and households with older adults.</p> <p>The qualification of displaced households was not held to the geographical areas identified by the government to qualify for the IDP certificate.</p>

Source: CWG, 2022a.

¹⁶ It should be noted that the Cash Working Group is currently piloting a new targeting framework establishing a scoring model based on a proxy means test for social-economic vulnerability (see <https://reliefweb.int/report/ukraine/multi-purpose-cash-assistance-targeting-framework-may-2023> for more details).

Some humanitarian organizations fully aligned their temporary cash programs with government eligibility criteria and represented their coordination through MoUs with the government, and their partnerships were reflected in law.

For example, the government adopted Decree N 405¹⁷ on April 5, 2022, which introduced a temporary cash transfer of three months with the United Nations Children’s Fund (UNICEF) (2,220 UAH per family member capped at five family members) for certain categories of vulnerable families with children (limited to families with three or more children in which at least one child is younger than two years and families with two or more children where at least one has a disability). The eligibility criteria, which was based on analysis from UNICEF’s 2021 [Child Poverty Report](#), were discussed with and approved by the government. The program, having ended registrations on 14 August 2022,¹⁸ allowed applicants to register online through either UNICEF’s website or the government’s (Diia) website, and UNICEF reviewed the applications and processed the payments. UNICEF was able to reach 224,303 households with cash transfers, covering close to 1,041,952 individuals, including 646,010 children (including around 55,000 households with children with disabilities, 150,000 households with three or more children, and 400 foster families). The decree specifies certain alignment details with the government SP system, such as how the temporary humanitarian assistance will not be considered when calculating the total family income for all types of government social assistance. However, it is unclear if recipients of the UNICEF program were still eligible to also receive the government assistance. Nevertheless, a second payment round was made, illustrating better alignment with government systems as the eligibility criteria included not only households with five or more children and families with children with disabilities, but also a list of households targeted through the government platform eDopomoga (UNICEF, 2023).

4.5. Transfer Value, Frequency, and Duration

Nationally Led Definition: Transfer value, duration, and frequency would be the same as the national program.

In the example case of alignment to the IDP housing assistance program in Ukraine, the humanitarian organizations would have implemented programs with the same components: 3,000 UAH for children and persons with disabilities and 2,000 UAH for everyone else for six months.

The transfer value for the MPCA is set by the CWG. In 2016, to determine the transfer value, the CWG conducted an income gap analysis, which compared income data collected by humanitarian cash actors to the Minimum Expenditure Basket (MEB). Previously, there was, to some extent, alignment with the government on the transfer value because the MEB used by the CWG was based on the actual subsistence minimum determined by MoSP (CWG, 2022b). The MoSP’s subsistence minimum was primarily composed of food, shelter, non-food items, and hygiene items. This approach continued during the scale-up response to the 2022 invasion with periodic revaluations of the MPCA transfer values.

¹⁷ Про реалізацію спільного з Міжнародним надзвичайним фондом допомоги дітям при Організації Об’єднаних Націй (ЮНІСЕФ) проекту щодо додаткових заходів соціальної підтримки найбільш вразливих категорій населення Постанова Кабінету Міністрів України від 05.04.2022 № 405 (On the implementation of a joint project with the United Nations Children’s Fund (UNICEF) on additional social support measures for the most vulnerable categories of the population. Resolution of the Cabinet of Ministers of Ukraine dated 05.04.2022 No 405) accessible via <https://zakon.rada.gov.ua/laws/show/405-2022-%D0%BF#Text>.

¹⁸ See <https://register.unicef.org/>.

However, concerns were raised among humanitarian actors that basing the transfer value on the subsistence minimum was not sufficiently aligned with humanitarian needs/consumption items. In mid-2023, the CWG undertook a new income gap analysis, which adopted a new MEB, one that dropped non-humanitarian items and incorporated humanitarian items determined by selected sectors/clusters. The new MEB¹⁹ is equivalent to an estimated cost of 6,318 UAH per person per month, resulting in a median income gap of 3,565 UAH per person per month within conflict-affected households. The Humanitarian Country Team approved a new transfer value to start on October 1, 2023 and cover 100% of the income gap, which was rounded up to 3,600 UAH per person per month for operational simplicity.

It should be noted that while the income gap analysis conducted by the CWG does allow for disaggregation by vulnerable groups, and past analysis shows that vulnerable groups are more likely to face adverse socio-economic conditions (CWG, 2022b), a flat transfer value is provided for both the rapid and emergency MPCA. On the other hand, the government’s IDP Housing Assistance Program provides 2,000 UAH per person per month, but children and persons with disabilities receive 3,000 UAH per month. The reasoning for the higher second transfer value is to meet some of the additional needs of children and persons with disabilities. However, there is no information on how the IDP Housing Assistance Program transfer value was determined.

TABLE 3. TRANSFER VALUE, FREQUENCY, AND DURATION BY PROGRAM

IDP Housing Assistance	Rapid MPCA	Emergency MPCA
2,000 UAH per person per month or 3,000 UAH per child or persons with disabilities per month. Payments are received for six months, but for particularly vulnerable families (see table 2) assistance can be received for 12 months.	3,600 UAH per person per month. Households receive three months of support provided as a one-time transfer.	3,600 UAH per person per month. Households receive three months of support provided as a one-time transfer.

4.6. Governance and Coordination

Nationally Led Definition: Coordination is led by and among government ministries with the possibility of donors and UN agencies being part of the steering committee.

In the case of Ukraine, nationally led coordination could have been reflected by the government heading the CWG jointly with the UN/NGO chairs.

The CWG leads the coordination of humanitarian cash transfers. CWG has established different timebound thematic task teams to identify context-based solutions to different thematic issues. Task Team 5 (TT5) on SP has the objective of exploring and identifying entry points for alignment with the national SP system. However, TT5 was disbanded by the CWG in July 2023 as other avenues are currently being explored in combination with the government/donor-led initiative, the PeReHID Initiative, which will be spearheading advancements on government shock-responsive SP. There is also a Task Team on deduplication and registration, which is intended to increase coordination between MPCA actors and reduce overlap of caseloads.

¹⁹ See Ukraine Cash Working Group - Minimum Expenditure Basket (MEB) August 2023 [EN/UK] - Ukraine | ReliefWeb for more details.

In an effort for more effective coordination, the government, donors, and UN agencies established the PeReHID Initiative in January 2023 to further strengthen coordination and to support the transition from the immediate emergency response to longer-term recovery efforts. The PeReHID Initiative aims to support the gradual integration of humanitarian cash transfers into the national SP system, reducing the need for standalone responses and supporting strengthening the system to be more responsive and adaptive to shocks.

Coordination with the government directly on humanitarian response takes place in a more ad hoc fashion. There has not been a forum where representatives from the CWG, donors, and the government regularly meet to discuss issues of coordination between humanitarian cash response and the SP system. The rapid expansion of humanitarian cash responses (both the government's and humanitarian community's) coupled with the lack of such a coordination forum and regular discussion, led to some disconnect between government expectations and humanitarian principles. eDopomoga is a prime example where the government expected the humanitarian organizations to fully cover applications without consulting them, leading to only 3.2 million out of 10.2 million applications being transferred to humanitarian organizations. While the eDopomoga platform indicates that only 3.25 million applications have received cash support from humanitarian organizations,²⁰ it is unknown how many others with applications in eDopomoga have already received assistance through the parallel humanitarian system. However, earlier in 2023, MoSP designated a focal point to engage with the CWG co-chairs on any cash related discussions. This has resulted in some greater collaboration, for example a joint workshop on eDopomoga in May 2023.

4.7. Outreach

Nationally Led Definition: Government designs and implements outreach campaigns. In Ukraine, this would be more harmonized efforts for disseminating humanitarian activities/programs through government information channels such as through local authorities' outreach activities or communication via eDopomoga and other government platforms.

Dissemination of information about MPCA programs is generally led by implementing agencies through various channels, including social media, hotlines, CWG's website, and face-to-face communications. Leveraging government systems to conduct outreach and information sharing appears to be limited to listing program information on the eDopomoga online platform and to programs implemented in partnership with the government (MoSP, June 2023). Some national organizations have involved local authorities and social service providers to conduct outreach. However, these experiences appear to be the exception rather than the norm for MPCA providers despite local authorities being viewed as one of the most trusted sources of information and the role of local community actors, village heads (Starostas), and others being seen as crucial for disseminating information on available cash assistance programs (Ground Truth Solutions, 2023).

While common outreach measures are lacking in terms of available international aid, there was coordination in outreach regarding an anti-fraud campaign warning Ukrainian residents about fake aid applications mimicking foreign aid providers. The campaign was launched on both government (MoSP, January 2023) and humanitarian organizations' dissemination channels.²¹

²⁰ Of which, according to EDopomoga dashboard, 3.25 million have received cash support. See platform at: <https://aid.edopomoga.gov.ua/dashboard>

²¹ See Ukraine CWG website: <https://response.reliefweb.int/ukraine/cash-working-group-cwg/ukraine-cash-contact-numbers-and-information-un-and-partners>

4.8. Delivery and Payment Mechanisms

Nationally Led Definition: All payments would be issued by the government and delivered through the government financial service provider(s), which may be government institutions like the post office (Ukrposhta) or private providers.

For Ukraine, using government delivery mechanisms (Ukrposhta and the contracted banks) would have been promoted amongst humanitarian actors after an assessment of its social inclusion and reach.

Since the start of the 2022 conflict, the government of Ukraine has expanded its modes of delivery for its cash programs. The expansion was made to increase inclusivity and ensure the continuity of benefit payments in the face of a very fluid context based on an analysis of their effectiveness. There is no unified approach for delivering MPCA under the CWGs, and it is largely left to humanitarian cash actors to decide what delivery mechanism they will use.

Because the government uses several different delivery mechanisms, there is an overlap between the humanitarian organizations and the government.

Humanitarian cash actors often ended up mainly using the same mechanisms as they were the most efficient. However, while a mapping of all existing financial service providers was done in March 2022 by the CWG,²² there was never an evaluation of the government's delivery mechanisms to piggyback onto a mechanism that is efficient and already familiar to and trusted by the recipients.

Practitioners noted that different factors influenced their decisions, namely the timeliness of delivery mechanisms and internal procurement processes. Regarding the former, certain organizations were already active in Ukraine before the conflict and prioritized using delivery systems with which they were already familiar to assist people as quickly as possible. Additionally, some practitioners noted that certain delivery mechanisms, for instance, Ukrposhta (postal service) took several weeks to process and deliver payments, which was deemed too slow. Regarding internal procurement processes, each organization has its own internal procedures related to financial compliance, procurement, and treasury, and this cannot be ignored to use the government's preferred delivery mechanism, so an analysis of those would be moot. Additionally, some organizations used Ukrposhta, similar to the government, due to the Ukrposhta's Know your Customer flexibility – accepting people without documentation with only protection letters from organizations. Finally, some organizations assumed that using national systems may preclude competitive procurement processes or audits.



Photos: Mercy Corps

²² See: Ukraine: Financial Service Provider (FSP) Mapping Tool (Task Team 2) as of 22 March 2022 | Humanitarian Response

4.9. Case Management

Nationally Led Definition: Needs assessments and referrals are led by government social workers, using government designed needs assessments, and referring to government services (social, health, education, employment) or to contracted providers. Cases are followed up by assigned case managers. There currently is not a case management system established in Ukraine where the needs of humanitarian cash transfer beneficiaries are assessed and referrals to government services are made.

Case management procedures to address beneficiaries' additional needs and vulnerabilities appear to be minimal, with few organizations having mechanisms to refer cash beneficiaries to government support services. One noted difficulty is the decentralized nature of social services, with local authorities having the responsibility to plan, finance, and implement services, resulting in differences between localities in terms of the extent of social services available. For example, for the International Rescue Committee to operate its cash for protection program for people with disabilities with a proper case management mechanism, they have to conduct desk research – check legal framework, state

policies, healthcare policies, etc. – within each locality to understand the services offered by each respective health care facility, the social protection department, and territorial centers for people living with a disability.

This situation is made more complicated when dealing with people on the move or rapid influxes of IDPs who can put additional, unplanned demands on local services. Practitioners noted that they could refer people to national hotlines for information on social services, but this does not guarantee that services will be provided.

4.10. Complaints and Appeals

The humanitarian response did not note an assessment of the effectiveness of the government's processes, mostly due to internal organizations' obligations and duties to provide an additional layer of protection/appeals for their

Nationally Led Definition: Government authorities establish and implement complaints mechanisms and appeals processes.

own programs. Even if humanitarian cash programs had been fully nationally led (using government systems and program designs), an additional layer of protection would likely be required to ensure proper accountability and neutrality.

However, it would have been difficult for humanitarian organizations to adopt national mechanisms for appeals of SP decisions as there is no centralized or digitalized appeal mechanism handling overall decisions of SP payments. Under administrative law, citizens can first appeal decisions related to SP payments to a higher authority or in administrative court.²³ The appeal options are usually spelled out by the SP administration when the decision to not grant a benefit is communicated to the applicant – where an applicant can send additional information to the SP body to have their case re-examined, or they can go straight to administrative courts.

²³ Article 12 of Code of Administrative Procedure of Ukraine, Bulletin of the Verkhovna Rada of Ukraine (VVR), 2005, No. 35-36, No. 37, p.446. Retrieved from: <https://zakon.rada.gov.ua/laws/show/2747-15/page#Text>

4.11. Monitoring and Evaluation

Nationally Led Definition: The government will design and implement monitoring and evaluation (M&E) frameworks. In cases where donors provide on-budget support, third-party monitors may be employed.

Humanitarian cash actors are responsible for conducting their own M&E, and the CWG has established guidelines for post-distribution monitoring. The government may have its own procedures for monitoring the IDP Housing Assistance program and other SP programs, but these are not public. There are scant examples of cooperation on M&E. However, the

newly implemented WFP pension top-up program does have some collaboration with the government to establish monitoring processes. Under the program scope and a data sharing agreement, WFP receives anonymised data from the PFU for the purpose of transferring complementary cash to target beneficiaries. As the data received to issue payments do not contain any personal identification information, in order for WFP to be able to conduct post-distribution surveys of recipients, WFP has to send a special request to PFU to receive telephone numbers and partial names of a sample of recipients.

5. Conclusion on Improving Alignment of Future Responses

The Ukraine humanitarian response presents a prime opportunity to practice what the international community has long been advocating: implementing a humanitarian-development-peace nexus approach at policy and programming levels leading to, amongst other commitments, the integration of humanitarian cash assistance with national SP mechanisms. Ukraine boasts a mature and growingly inclusive SP system structured within a highly digitalized environment and is led by a government genuinely welcoming of international aid and expertise. Moreover, the 2022 conflict was not unprecedented in nature as humanitarian actors have been providing MPCA in Ukraine since 2014/2015 as a response to the incursion in the Donbas region by the Russian Federation.

Despite the high potential for preparedness and structured/strategic coordination, humanitarian organizations linking with SP and coordination between the government and humanitarian MPCA have been ad hoc. Reflections on how future responses could be improved are grouped into two pillars: preparedness and coordination.

Preparedness

- › There has not been an assessment of the entire national SP system to identify entry points and bottlenecks in the design and operations of cash programs (e.g., delivery mechanisms) or development of procedures for how to leverage the SP system despite the long presence of humanitarian agencies, including UN organizations in Ukraine. Several countries in the region, including Armenia, Tajikistan, Uzbekistan, and Georgia, have undertaken similar assessments and developed road maps.
- › An assessment of the national SP system identifying entry points and bottlenecks, inclusive of an information management/data protection analysis, would **support a more common approach to leveraging the national SP system** and would position humanitarian organizations to understand if and how to utilize nationally led systems for each element of the delivery chain (e.g., registration, payment mechanisms, information management, etc.).

- › While some assessment tools have already been developed (SPAN, UNICEF), it is important that **analysis be conducted through the lens of humanitarian principles**, looking at the implications of different types of emergencies (e.g., natural disasters, financial crises, conflicts) on response.
- › Any further assessment of the national SP system will need to pay **special attention to the capacity of local authorities to respond**. In cases where local authorities are unable to respond by themselves, a plan could be made for how the international community can supplement (with the legal boundaries).

Coordination

- › Efforts to **encourage the government to lead cash coordination mechanisms** should be formalized to ensure structured governance and coordination mechanisms for future responses, as already proposed by the Inter-Agency Standing Committee Cash Coordination Model (2022). The PeReHID Initiative will most likely respond to this need as it aims to enhance coordination between the international community and the government (MoSP and others) while reforming the SP system to be more shock responsive. However, it is important that the process remains as inclusive as possible and that the perspectives, expertise, and experience of international and national NGOs are incorporated as much as possible to ensure synergies and coordination. The NGO representatives on PeReHID must actively involve the NGO community.
- › Efforts to establish **data-sharing agreements** and other arrangements to allow the **safe transfer of individual data** between the government and international organizations need to be standardized and harmonized between actors to avoid the current ad hoc, and undoubtedly time consuming for the government, arrangements. **High-level discussions with the government are needed** to set a standard approach to facilitate coordination and collaboration with humanitarian organizations.
- › On system coordination, it is important to continue to strive for a **nationally led information management system** (or at least one that is interoperable with government systems), where through individual consent, humanitarian organizations' aid could be found easily on government websites facilitating registration and enrollment, as well as facilitating deduplication efforts of the humanitarian response.
- › While coordination led by the national government is encouraged and has achieved fruitful results in other country responses, it is also **essential to encourage coordination led by local authorities**. UN, international NGOs, and donors should widely support local NGO entities and civil society organizations as they play a pivotal role in establishing a vital system of checks and balances within government-led initiatives for SP due to their close ties and connections with local communities. If well executed, this could ensure that initiatives are executed transparently and effectively, reducing the risk of corruption and mismanagement of resources. Few organizations have partnered with local authorities to carry out different elements of the delivery chain, such as outreach, registration, and case management. Humanitarian organizations can explore how to partner with local authorities, learning from those who have already established MoUs. Area based coordination efforts should include local authorities to streamline delivery elements of the delivery chain.

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CONTACT

CLARA DECAMPS
CCD Social Protection Advisor
CCD
c.decamps@savethechildren.org.uk
www.collaborativecash.org

KRISTIN SMART
Cash Director
Mercy Corps
ksmart@mercycorps.org

About Mercy Corps

Mercy Corps is a leading global organization powered by the belief that a better world is possible. In disaster, in hardship, in more than 40 countries around the world, we partner to put bold solutions into action — helping people triumph over adversity and build stronger communities from within. Now, and for the future.



45 SW Ankeny Street
Portland, Oregon 97204
888.842.0842
[mercycorps.org](https://www.mercycorps.org)