Unbundled: A framework for connecting safety nets and humanitarian assistance in refugee settings

Karin Seyfert, Valentina Barca, Ugo Gentilini, Manjula Luthria, and Shereen Abbady
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Abstract. The debate on if and how to connect humanitarian assistance for refugees with national social protection systems can elicit polarizing views. Hence, it is not unusual to observe country-level approaches getting somewhat ‘stuck’ – especially where refugees represent a sizable share of the population: from a donor perspective, the question is how can governments be persuaded to be more inclusive; from a government standpoint, it faces disproportionate political and economic risks from “being left with the bill”; and from the international humanitarian agencies viewpoint, there might be quandaries on how to reconcile commitments to neutrality and independence with those to respecting the primary responsibility of governments. These stylized views are legitimate, but their combined effect may generate competing narratives and little negotiating space among the multiple actors involved. The net result might be the endurance of a sub-optimal dual systems operating in parallel – one for refugees, one for citizens. The framework laid out in this paper attempts to facilitate the identification of workable pathways for progress among actors. Instead of framing the humanitarian-social protection links as an ‘either-or’ choice, the framework includes a more granular analysis of how collaborations may emerge around select programmatic ‘functions’, as well as the ‘degrees’ of possible connection between national and international support within a given function. While work in progress, such analytical approach is already emerging from country practices and withholds the potential to help ‘unstuck’ the debate.

Keywords: social protection, social assistance, cash transfers, humanitarian assistance, refugees, displacement, fragility.

JEL codes: P33, P36, I38, H84, J61

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Acknowledgements

This paper was generously funded by the United Kingdom’s Department for International Development (DFID). Special thanks go to Chris Reilly, Will Helyar, Tamara Silver with DFID’s team for their precious comments and support. Hana Brixi, Tania Meyer, Lynne Sherburne-Benz, Khalid Ahmed Ali Moheyddeen, and Cristobal Ridao-Cano provided invaluable strategic guidance. The authors are grateful to participants at a workshop in Amman (May 2019) and seminar in Washington DC (June 2019) for their precious feedback, as well as to Paul Harvey and Mirey Ovadiya for their review and comments. Thanks also go to Helena Makarenko for her administrative support, and Raiden Dillard and Renata Mello for publication assistance.
1. Introduction
The links between humanitarian assistance and social protection elicit deep philosophical, policy and programmatic quandaries (Gentilini 2016). This paper lays out a pragmatic framework that would help, at least in part, to “take the heat out of the debate”. In doing so, the paper expands on work on social protection and humanitarian assistance by Gentilini et al (2018), O’Brien et al (2018) and World Bank (2016), and integrates it with recent research on cash assistance in refugee settings (EC 2019; UNHCR 2019a; 2019b; Maunder et al. 2018).

Interestingly, humanitarian-social protection interactions are characterized by growing convergence on some issues, and a soaring divide on others. For instance, about 10 percent of global humanitarian assistance is now delivered in cash, hence offering an opportunity to connect with national cash-based programs (CaLP 2018). Also, governments are increasingly investing in making national social protection ‘shock-responsive’, thereby opening new doors for collaborations with global partners (CaLP 2018; World Bank forthcoming). Yet, a distinctive feature of humanitarian assistance revolves around the degree of involvement with and engagement of national authorities (Konyndyk 2018). While governments have the primary responsibility to assist and protect their citizens in times of crisis (UN46/182) – an obligation reiterated in the 2016 Grand Bargain – only 2.5 percent of humanitarian aid is channeled through host governments (Development Initiatives 2018; WHS 2016).

Why is there such disconnect? UNCHR (2019b) and Gentilini et al (2018) point to a number of constraints that limit the ability of humanitarian cash assistance to integrate with government provisions. These may include a risky operating environment; the need for timely assistance in life-threatening situations; possible lack of government sovereignty over a territory in full or part; legislation preventing some types of domestic assistance to non-citizens; concerns about the impartiality of governments in conflicts; low government capacity; and ensuring transparency and accountability of resources.

The literature discussing factors inhibiting closer connections between social protection and humanitarian assistance is flourishing. The EC has recently completed a major study on shock responsive social protection (Cherrier et al. 2019); O’Brien et al. (2018) describe in which way national systems can be expanded to accommodate people affected by humanitarian disaster; and the World Bank is in the process of finalizing an overview of such debates within an ‘adaptive’ framework (World Bank forthcoming). Moreover, Mitchell (2018) discusses how national systems could flex to accommodate displaced people. Specifically, the paper calls for a progressive transition from a parallel humanitarian delivery system, to one including features that are compatible with the national system until they are completely with the national system, if institutionally separate. Once both systems are harmonized, displaced people are progressively included in the national system.

A growing number of them tend to focus on displacement contexts. Recent papers by both the European Commission and UNHCR spearhead calls for further integration of refugees in
national systems (UNHCR 2019b; EC 2019a). The recent Refugee Compact initiative explores strategies to move from UNHCR’s traditional ‘care and maintenance’ model to out of camp strategies promoting resilience and inclusiveness of host and displaced communities alike (ILO 2018). Under the Comprehensive Refugee Response Framework (CRRF) compact principles are currently piloted by UNHCR in 15 countries.

Recent country experiences with large refugees inflows vividly underscore the political economy considerations at play (Maunder et al. 2018). Governments may be unwilling to accept non-nationals into their delivery systems for several reasons. For instance, states might be reluctant to take on financial responsibility to delivery humanitarian assistance given budget constraints and the open-ended nature of the crisis. This can also generate high political risks in contexts of pre-existing societal tensions and weak social contracts. Political economy considerations are important when considering, for example, transfer amounts and programme sustainability. Humanitarian objectives are focused on saving lives and meeting basic needs. This may lead to larger transfer amounts than those received by the host communities, hence providing a potentially explosive situation in overcrowded urban areas with hosts and refugees living side-by-side (Gentilini 2015).

It is at this stage that the debate gets somewhat ‘stuck’ – i.e., from a donor perspective, the question is how can governments be persuaded to be more inclusive; from a government standpoint, it faces disproportionate political and economic risks from “being left with the bill”; and from the international humanitarian agencies viewpoint, there might be quandaries on how to reconcile commitments to neutrality and independence with those to respecting the primary responsibility of governments. Also, concerns around the technical, humanitarian and budgetary implications from transitions between national and international systems. All these stylized views are legitimate, but their combined effect may generate competing narratives and little negotiating space among the multiple actors involved. The net result might be the persistence of a sub-optimal dual system operating completely in parallel for an indefinite amount of time.

Against such backdrop, the framework laid out in this paper attempts to facilitate the identification of workable pathways for progress among actors. Instead of framing the humanitarian-social protection links as an ‘either-or’, the framework unbundles the variety of ways and options that actors can consider for better connecting humanitarian and social protection approaches. This includes a more granular understanding of how collaborations may emerge around select programmatic functions, as well as the degrees of possible connection between national and international support within a given function. These are not just analytical propositions, but practices already emerging from countries like Turkey and Lebanon.

The reminder of the paper is structured as follows: the next section lays out a continuum of four engagement options for humanitarian assistance, from parallel to integrated systems. Section 3 applies such continuum to a variety of programmatic function, including a
disaggregated discussion for fourteen individual functions. Section 4 discusses emerging implications for each four model, including in terms of sustainability, accountability, coverage, and other parameters, while section 5 concludes.

2. A continuum of options

Humanitarian social assistance systems for refugees can be placed on a continuum ranging from completely parallel systems to being fully led by national systems (see Figure 1). The options listed below, define arbitrary boundaries along what is actually a continuum.

Following O’Brien et al. (2018) we define the following four:

1. **Parallel or stand-alone humanitarian response**: under this option, the delivery of social assistance to refugees is stand-alone from national systems

2. **Shadow Alignment**, which is a stand-alone response, but one that aligns with existing or future social assistance programmes

3. **Piggybacking**, which represents a response that combines stand-alone response with working through national systems to deliver assistance.

4. **National system-led**, or entirely run through national systems, where refugees are part of the national caseload. In this case, approaches such as horizontal or vertical expansion as well as technical fixes, apply.¹

**Figure 1: A continuum of delivery approaches for social assistance to refugees**

![Figure 1: A continuum of delivery approaches for social assistance to refugees](image)


In order to illustrate the typology more in detail, we briefly outline funding and reporting lines of these different scenarios using simplified organisational charts to illustrate how these four

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¹‘Vertical expansion’ refers to temporarily increasing the value or duration of benefits for existing beneficiaries. Horizontal expansion refers to temporarily increasing the number of recipients in an existing social protection programme. Technical fixes refer to making small adjustments to the design of routine social protection programmes.
options might look like. In the case of stand-alone humanitarian response, for instance, international agencies and NGOs set up a parallel and independent social protection system for a target population within a country (i.e. in a set district) – as a standalone humanitarian response (figure 2). The org chart below is an illustration of one potential set up of parallel systems, it captures the flow of funding to refugees in the parallel systems approach. There may be coordination between actors, but key governance and delivery decisions are taken independently, with governments playing a relatively minimal role.

**Figure 2: Funding flows in the Parallel Systems approach**

![Diagram of funding flows in the Parallel Systems approach]

Alignment is also a stand-alone response run by a humanitarian relief partner. It is one that has been designed to align with or mirror existing or future national social assistance programmes. This means that while donors, the UN and NGOs deliver humanitarian assistance, government counterparts offer strong input during design stages to ensure the humanitarian assistance mimics the national one (figure 3).

**Figure 3: Funding flows in the Alignment delivery systems approach**

![Diagram of funding flows in the Alignment delivery systems approach]
Humanitarian assistance that is piggy-backing in national systems is no longer a stand-alone response (figure 4). Donors and international humanitarian implementing agencies rely on existing national social assistance structures to deliver assistance. That being said, humanitarian assistance delivery will not entirely depend on national structures, but rely on both the humanitarian and the national system.

**Figure 4: Funding flows in the Piggy Backing delivery systems approach**

In this scenario, donors would typically work through a UN agency and with the Social Protection ministry to deliver a humanitarian cash transfer through the national delivery system. An NGO may be engaged to support with M&E or protection referrals. In the scenario below, the government could provide manpower and access to existing institutions. In a different scenario, NGO and national delivery systems might work in parallel.

Finally, humanitarian assistance that is nationally led relies entirely on the national delivery system (figure 5). Nationally led social assistance to refugees is akin to giving budget support to a government for a national policy. Refugees would be considered as part of the ‘standard’ pool of social protection cases and no distinction would be made between them and nationals. In this case, refugees can be treated like a surge in needs and all ‘usual’ adaptive social protection strategies apply (World Bank, forthcoming; O’Brien et al. 2018). Yet, few examples exist of this approach. For instance, the EU gave small budget support to Greece and Spain as countries of first arrival (EC 2018).
3. Unbundling

This continuum can be applied across every element of the social protection delivery chain (Lindert et al forthcoming). For example, there might be cases when it could make sense to manage payment mechanisms for both the humanitarian transfer as well as the national social assistance through one common financial service provider. The humanitarian transfer could piggyback on existing payment mechanisms.

In a similar vein, other elements of the humanitarian and national social assistance delivery chain could be aligned to each other. For example, targeting methods for the humanitarian and social assistance transfer could use the same targeting method but be run by two different agencies. One could be implemented by a humanitarian agency for the refugee caseload and the other by a social protection authority for citizens. Some elements of that same illustrative system could run completely in parallel. For instance, refugees may enrol into the transfer by registering with UNHCR, which could include an assessment for the transfer, while citizens might have to apply at social assistance offices. In the case of humanitarian cash assistance led by national provision systems, the host government leads on programme design and refugees are entirely part of the national social assistance system. Humanitarian agencies may offer financial support or technical assistance.

In practice, to date most systems of support for refugees are largely parallel to national systems. This paper considers whether and how they could move along the continuum (see 6). It is worth adding that different adaptation approaches can be combined with each other. Figure below may well represent the final and best way to link national and humanitarian cash assistance systems.
Aid agencies choosing along the continuum should also assess national social protection capacities to determine where opportunities for alignment and integration lie. The degree to which a country is affected by crisis is commonly used basis for an assessment\(^2\). We would concur with UNHCR (2019b) to argue that delivery capacity, along with political economy considerations discussed above, are likely more important. Annex 2 in UNHCR (2019b) includes a helpful decision tree that outlines how to assess host government capacity and humanitarian regulation in place. The Yemeni case shows, that even in severe crisis, existing social assistance systems can deliver, provided they are in place form the onset (Al-Ahmadi and da Silva 2018).

### 3.1 Financing

Funding for cash assistance when part of national social protection systems, comes from national budgets and is financed from government revenue. Donors, through international appeals, most commonly finance humanitarian cash transfers. Table 1 below describe in more detail how various financing options could look like along the continuum.

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\(^2\) i.e. A Typology of Humanitarian Contexts and Social Protection Provision Towards the development of a common ECHO-DEVCO guidance package, Phase 1 Report
Table 1: Financing

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Donors</td>
<td>Mostly, funding is channelled from donors, to UN agencies, to NGOs, to beneficiaries.</td>
<td>No effect on host government’s budgets. Even though humanitarian funding horizons are increasing in length, they are still shorter compared to national budgets and humanitarian funding flows can be unpredictable.</td>
</tr>
<tr>
<td>Donors</td>
<td>Funding is channelled from donors, to UN, to NGOs, to beneficiaries. Government counterparts may participate in cash working groups.</td>
<td>Same as for parallel systems above: No effect on host government’s budgets.</td>
</tr>
<tr>
<td>Donors</td>
<td>Donors will transfer funds either to a UN agency, a trust fund or a selected financial provider. Regulation governing humanitarian funding will be important. Most humanitarian funding has to run through specialized humanitarian funding mechanisms.</td>
<td>The government will likely make in kind contributions in the form of staff or PFM systems. Here is no effect on host government’s budgets.</td>
</tr>
<tr>
<td>Governments or donors</td>
<td>Donors will offer budget support to national governments, through a variety of instruments. Governments may increase budget allocations under their own DRM financing processes.</td>
<td>Refugees will impact national social protection budgets.</td>
</tr>
</tbody>
</table>

3.2 Legal and policy framework

The legal and policy frameworks of cash assistance set out what the goals of the transfer are, as well as define core procedures and assign implementation responsibilities. Table 2 below describes in more detail how various options could look like along the continuum.
### Table 2: Legal and policy frameworks

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs and donors, abiding by national legislation, but not bound by national social protection policies.</td>
<td>Delivery agencies follow humanitarian principles and polices set by coordination mechanisms (often the cluster system). National governments set the legal framework but are little involved in planning or design.</td>
<td>None.</td>
</tr>
<tr>
<td>NGOs and donors, abiding by national legislation, and following national social protection policies.</td>
<td>Delivery agencies follow humanitarian principles and polices set by national governments using coordination mechanisms such as working groups or steering committees. Policies governing the humanitarian systems should be aligned with national social protection policies.</td>
<td>Same as for parallel systems: None.</td>
</tr>
<tr>
<td>Line ministries and the UN. Depending on the degree of piggybacking.</td>
<td>A humanitarian transfer may ‘borrow’ national legislation, for instance on IDs. Or setting up legislation that allows refugees to formally enter social registries.</td>
<td>Changes in national legislation or policy are likely. For instance, to expand national social protection to refugees, create national IDs for refugees etc.</td>
</tr>
<tr>
<td>Line ministries</td>
<td>Refugees enter national systems and are classified as social protection recipients in line with citizens.</td>
<td>Changes in national legislation or policy are likely.</td>
</tr>
</tbody>
</table>

### 3.3 Setting eligibility criteria

Eligibility criteria and qualifying conditions set out who can benefit from a cash transfer. They can include characteristics such as age, family status, disabilities or household income. Table 3 below describes in more detail how eligibility criteria could be set and look like along the continuum.
### Table 3: Setting eligibility criteria

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Determined by NGOs, in coordination with donors.</td>
<td>Often proxy means testing using assets as proxy but also vulnerability criteria (i.e. dependency ratio, disabilities, age).</td>
<td>Eligibility criteria and approaches will likely be different between humanitarian and national social assistance. Eligibility criteria among various humanitarian programmes may also differ. Such difference between nationals and refugees may lead to perceptions of unfairness among beneficiaries.</td>
</tr>
<tr>
<td>Set by NGOs, in coordination with donors, aligned to existing government processes and criteria.</td>
<td>Implementing agencies mirror government practice. Eligibility criteria do not need to be exactly the same but use similar conceptual approaches.</td>
<td>Humanitarian assistance will be strongly shaped by existing national practice. This may be in conflict with humanitarian principles.</td>
</tr>
<tr>
<td>Line ministries and implementers. Depending on the degree of piggybacking.</td>
<td>Eligibility is determined by the national system, though special conditions may apply to refugees. Full piggybacking would mean using the same eligibility processes and criteria as is used for nationals.</td>
<td>None.</td>
</tr>
<tr>
<td>Line ministries</td>
<td>Eligibility is determined by the national system. New eligibility criteria may be developed.</td>
<td>Capacity increases may be required as well as technical support in how to best determine eligibility.</td>
</tr>
</tbody>
</table>

### 3.4 Setting transfer type, level, frequency, duration

Table 4 below describes in more detail various options of setting type, level, frequency and duration of a cash transfer.

### Table 4: Setting transfer type, level, frequency, duration

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Determined by implementing agencies such as NGOs, sometimes UN and donors.</td>
<td>Mostly monthly cash transfers, occasionally vouchers. Levels are commonly set to help households meet a minimum expenditure basket. The overall duration is determined by</td>
<td>Refugees may receive higher benefits compared to host populations. Benefit levels among humanitarian and national programmes will likely</td>
</tr>
<tr>
<td>Who is responsible?</td>
<td>How is it delivered?</td>
<td>What are implications along the delivery chain?</td>
</tr>
<tr>
<td>---------------------</td>
<td>----------------------</td>
<td>------------------------------------------------</td>
</tr>
<tr>
<td>Determined by implementers. Aligned to existing government guidelines.</td>
<td>Type and frequency of transfer can often be easily aligned. The transfer amount will have to be negotiated to be coherent with national levels of support.</td>
<td>Humanitarian assistance will be strongly shaped by existing national practice. This may lead to lower transfers and might be in conflict with humanitarian principles.</td>
</tr>
<tr>
<td>Line ministries and the implementers. Depending on the degree of piggy-backing.</td>
<td>The transfer amount will have to be negotiated to, if not align, at least be coherent with national policy.</td>
<td>National transfer amounts will likely set the benchmark. These may be below humanitarian basic needs requirements.</td>
</tr>
<tr>
<td>Line ministries.</td>
<td>The transfer amount for refugees will be the same as existing national transfers.</td>
<td>As for piggy-backing: National transfer amounts will likely set the benchmark. These may be below humanitarian basic needs requirements.</td>
</tr>
</tbody>
</table>

### 3.5 Governance and coordination

Governance of a cash transfer is about ‘who makes strategic decisions about the transfer?’ and ‘who coordinates all the various partners?’ Ministries of social affairs or social development are often in charge of national social assistance. Humanitarian coordination procedures, the cluster or working group system, are in place for transfers to refugees. Table 5 below describes in more detail various governance options.

**Table 5: Governance and coordination**

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steering committee involving UN and NGOs, sometimes donors</td>
<td>Coordination, mostly through the Cash Working Group in the cluster system. The government is sometimes involved in an advisory capacity in steering committees.</td>
<td></td>
</tr>
<tr>
<td>Steering committee involving UN, NGOs and government line ministries</td>
<td>Coordination will move in emphasis from the Cash Working Group to a steering committee where the government plays a stronger role.</td>
<td>The government has greater input in design decisions. Attempts to align delivery may also lead to the alignment of various humanitarian cash assistance with each other</td>
</tr>
</tbody>
</table>
### 3.6 Outreach

Outreach is about bringing the cash assistance to people who need it and to ensure that services and information necessary reaches people targeted by the transfer. Outreach may include communication campaigns and home visits. Table 6 below describes in more detail various options for outreach along the continuum.

**Table 6: Outreach**

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs</td>
<td>Often NGO staff working with social workers or community-based volunteers. NGOs can commonly only afford a small caseload and outreach may be kept deliberately limited.</td>
<td>Often, there are no large-scale outreach campaigns (not to raise expectations). Outreach efforts to target refugees will also reach and inform potential non-beneficiary host communities.</td>
</tr>
<tr>
<td>Outreach likely led by NGOs</td>
<td>As above. Due to the alignment there is scope for cross-programme outreach being supported by government offices.</td>
<td></td>
</tr>
<tr>
<td>Either the government or humanitarian actors could lead outreach.</td>
<td>Implementing agencies may support national providers with resources and capabilities to design outreach campaigns. If assistance is national and large in scale, nationwide outreach is feasible.</td>
<td></td>
</tr>
<tr>
<td>Line ministries and their regional social protection offices.</td>
<td>Awareness raising campaigns are unlikely. There may be some outreach at the local level.</td>
<td>Assistance is likely focussed on reaching host communities. Making outreach accessible in different languages and platforms used by refugees may require technical assistance.</td>
</tr>
</tbody>
</table>
3.7 Registration
Registration refers to the process when potential beneficiaries formally express their desire to be enrolled into the cash assistance programme. Table 7 below describes in more detail various options for registration along the continuum.

Table 7: Registration

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs or UNHCR, NGOs may be appointed by UNHCR</td>
<td>NGOs will often carry out home-visits to register applicants. UNHCR holds a central database of refugees and may refer certain cases to NGOs for registration for the cash assistance programme.</td>
<td>The registration process is likely different from the usual humanitarian assistance protocol.</td>
</tr>
<tr>
<td>NGOs or UNHCR, NGOs may be appointed by UNHCR. Aligned to existing government processes and variables collected.</td>
<td>The humanitarian and national SP programmes use similar registration processes, but registration may be with different organisations for nationals and refugees. Similar types of variables are collected.</td>
<td></td>
</tr>
<tr>
<td>Registration is done by national staff, but may be financed by a donor and supported by technical assistance.</td>
<td>If registration into the humanitarian transfer piggy backs on the national system, registration is likely to happen via application at a social protection office and not via home visits.</td>
<td>An unusually large caseload may enter national registration offices, requiring short term surge capacity in key locations, such as increased social workers, translators etc.</td>
</tr>
<tr>
<td>Regional social protection offices.</td>
<td>Refugees will likely make applications via a social protection office, the same location as nationals. They may also be registered via health visits or screenings at schools, depending on the national referral system.</td>
<td>As for piggy-backing in cell above.</td>
</tr>
</tbody>
</table>

3.8 Enrolment
Enrolment refers to the process when registered candidates for the programme are enrolled in it and become beneficiaries. Enrolment will likely overlap with registration. Those responsible for registration will likely also manage enrolment. Table 8 below describes in more detail various options for enrolment along the continuum.
### Table 8: Enrolment

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs</td>
<td>Social workers may collect enrolment information during a home visit, likely at the same time as registration. Once the data is entered, eligibility may be assessed automatically (i.e. using a PMT formula). Beneficiaries may be notified via text message or receive a letter or call about the status of their application.</td>
<td>None.</td>
</tr>
<tr>
<td>NGOs, sometimes UN</td>
<td>Enrolment of nationals and refugees is carried out separately, but using a similar process. Enrolment would be into a system run be the NGO or UN agency.</td>
<td>None.</td>
</tr>
<tr>
<td>Government agencies.</td>
<td>Enrolment will happen using a government system or process. This is likely an automated process after registration once key information has been processed. Beneficiaries are likely to receive notification via sms, phone or mail.</td>
<td></td>
</tr>
<tr>
<td>Government agencies.</td>
<td>Enrolment will likely happen in an automated way on the national social registry once key information has been processed.</td>
<td></td>
</tr>
</tbody>
</table>

### 3.9 Payments

A financial service provider makes payments to beneficiaries. This can be a public or a private provider. Table 9 below describes in more detail various options for payments along the continuum.

### Table 9: Payments

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Various third-party financial providers</td>
<td>A payment provider is usually selected following a competitive process. A variety of providers and disbursement mechanisms are possible.</td>
<td>Two visibly different payment process will be in operation, one for refugees one for nationals.</td>
</tr>
</tbody>
</table>
### Table 10: Case Management

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Various third-party financial providers, or the same as used by the government.</strong></td>
<td>As long as the use of the payment mechanism and the payment frequency align, the provider may be a different one. NGOs might use the same financial provider as used by the government and pay the same charge so as to not distort the market.</td>
<td>Alignment of practices across payment providers might have to be negotiated.</td>
</tr>
<tr>
<td><strong>Same payment provider as the government, with NGO/UN support to deal with the increased caseload.</strong></td>
<td>Payment is likely going to happen using the same payment provider as used by the national transfer. The relevant agency would negotiate an agreement with the provider or could use the same contract as the government.</td>
<td>UN agencies and NGOs may be bound by procurement rules to competitively procure a financial provider. If working with the government provider of choice is desired, a competitive process may not be feasible. The financial provider might see the additional case load as damaging or overwhelming.</td>
</tr>
<tr>
<td><strong>Government financial provider.</strong></td>
<td>Payment mechanisms are the same for both nationals and refugees.</td>
<td>If a large number of individuals is enrolled in a short time frame, surge support may be required. The financial provider might see the additional case load as damaging or overwhelming.</td>
</tr>
<tr>
<td><strong>NGOs, UNHCR or another UN agency</strong></td>
<td>Case management activities would involve repeated home-visits, validation exercises etc. These are staff-intensive. NGO case management might be run on an interoperable database, where cash partners make part of their beneficiary databases accessible to avoid duplication.</td>
<td>The staff intensive nature of this form of follow up means that it usually only covers a small number of beneficiaries.</td>
</tr>
</tbody>
</table>
### 3.11 Complaints and appeals

Complaints mechanisms are avenues for beneficiaries to raise concerns about issues such as late payments or clarity on eligibility criteria. Appeals mechanisms allow beneficiaries to appeal the decision that has been made on their benefit entitlements.

Table 11 below describes in more detail various options for complaints and appeals along the continuum.

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs, sometimes UN. Mimicking and building on government systems</td>
<td>NGO staff are mirroring government designed case management protocols (i.e. similar frequency of home visits or validation processes).</td>
<td>It is likely that NGOs will want to run closer case management if the government approach is quite hands-off. Poor case management has larger reputational consequences for NGOs compared to governments.</td>
</tr>
<tr>
<td>National mechanism, with NGO/UN support to deal with the increased caseload</td>
<td>Case management led by national social workers and national systems, with reporting mechanisms to the UN agency and close supervision by the M&amp;E team.</td>
<td>This may require expanding statutory duties of existing case workers to include refugees. The UN/NGO partner may have limited access to case files and limited oversight over case management.</td>
</tr>
<tr>
<td>National mechanisms.</td>
<td>Case management led by national social workers and national systems,</td>
<td>This may require expanding statutory duties of existing case workers to include refugees. Increased staffing and training to deal with the increased caseload may be required.</td>
</tr>
</tbody>
</table>

Table 11: Complaints and appeals
### Protection

Protection is included here since refugees are especially vulnerable to abuse and do not have the same rights and legal protections as citizens. Social and humanitarian assistance to refugees should include activities such as screenings to assess if a refugee is particularly vulnerable and may need additional protection (such as an unaccompanied minor, or a person with disabilities). People found in need of additional protection activities should be referred to the relevant service (such and mentorship and adult support for unaccompanied minors). Table 12 below describes in more detail various options.

#### Table 12: Protection

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs, sometimes UN agencies</td>
<td>Outreach and registration often include a protection assessment. Registration with UNHCR always mostly a protection screening. The efficiency of referrals depends on the availability of service providers and the capacity in the protection and social care sector.</td>
<td>Protection is dependent on the implementing agency’s connections to protection service providers.</td>
</tr>
</tbody>
</table>
Who is responsible? | How is it delivered? | What are implications along the delivery chain?
---|---|---
NGOs, sometimes UN | Protection referrals are often weak in national systems. NGOs could align to them but may reproduce a weak system in doing so. | NGOs may not choose to align to national protection/social care services if they are weak, but will continue using their own processes. The effort of aligning national and humanitarian protection activities may strengthen the national system and lead to systematising cross-agency protection referrals.

National social care services | Protection cases might be referred to social care services at registration, depending on the connections that exist in the national system between social assistance and social care services. Other options are referrals by schools or the health service. NGOs may beef up the national system. | If the national system is weak, this is likely reproduced in the humanitarian assistance. Considering that refugees are vulnerable, it may be worth considering providing extra support and surge capacity in this area.

National social care services | As above. | As above.

### 3.13 Information Management

Information management refers to how beneficiary data is managed and shared between agencies. It includes social registries and other beneficiary databases. Table 13 below describes in more detail various options.

**Table 13: Information Management**

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs, sometimes UN (e.g. especially UNHCR and WFP)</td>
<td>UNHCR’s registration database is often used as a de facto social registry of refugees. It functions as a basic case management tool. UNHCR often will register refugees and pass a redacted version of the data on to NGOs. NGOs may add beneficiary information to the database.</td>
<td>Each NGO will have its own database, these will rarely be shared entirely with other organisations. Though redacted versions are used for coordination.</td>
</tr>
<tr>
<td>NGOs, sometimes UN</td>
<td>A case management system is built with longer term objective of integration with government systems, as well as handover and capacity building for government.</td>
<td>Refugees are vulnerable and in need of rigorous data protection. Sharing full beneficiary profiles across agencies is likely impossible.</td>
</tr>
</tbody>
</table>
**Who is responsible?**  
Use of government SP data systems and capacity

**How is it delivered?**  
The government will lead on case management. This will likely require changes to the national social protection databases. Humanitarian agencies will see small excerpts of the full database.

**What are implications along the delivery chain?**  
For data protection reasons, it is unlikely that humanitarian partners will get full insight into this database.

---

**Who is responsible?**  
Use of government data, systems and capacity

**How is it delivered?**  
The government will lead on case management.

**What are implications along the delivery chain?**  
Changes in national databases may be required to accommodate refugees. Humanitarian agencies will not have access to this data without government approval.

---

### 3.14 Monitoring and Evaluation

Monitoring and evaluation examines if the cash assistance is delivered as intended, is reaching the people it intended and has the desired welfare impacts. M&E activities include the running of focus groups, household surveys and regular monitoring visits. Table 14 below describes the various options.

**Table 14: Monitoring and Evaluation**

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGOs</td>
<td>NGOs will carry out monitoring and impact assessments</td>
<td>If there are several programmes running in parallel this might lead to duplication of M&amp;E systems and reporting against a variety of not necessarily comparable indicators.</td>
</tr>
<tr>
<td>NGOs, sometimes UN</td>
<td>Governments rarely carry out impact assessments of their social protection policies. NGOs will carry out monitoring and impact assessments, beyond what the government is doing, likely to satisfy accountability to their donors.</td>
<td>Aligning of programming may lead to joint M&amp;E approaches. Even if monitoring efforts cannot be aligned, evaluations can be more easily coordinated.</td>
</tr>
<tr>
<td>If an international donor contributes to the programme, it is likely that the donor will hire an NGO to carry out third party monitoring and impact</td>
<td>M&amp;E partners will likely monitor government implementation on the ground and feed back to donors. They may work with national statistical offices to implement the M&amp;E effort.</td>
<td>Strong support is required to insist on rigorous and independent M&amp;E data.</td>
</tr>
</tbody>
</table>
### Table: Who is responsible? How is it delivered? What are implications along the delivery chain?

<table>
<thead>
<tr>
<th>Who is responsible?</th>
<th>How is it delivered?</th>
<th>What are implications along the delivery chain?</th>
</tr>
</thead>
<tbody>
<tr>
<td>assessments on the government provider.</td>
<td>If the humanitarian relief is entirely funded from national budgets, the government will lead on the monitoring effort. Otherwise the same case as piggy-backing applies. Media outlets may play an ad hoc monitoring role.</td>
<td>If the government leads on implementation it will be national audit offices or statistical offices who will design and implement monitoring and evaluation approaches. Third party M&amp;E partners may monitor government implementation on the ground and feed back to donors if donors contributed to the cash transfer. As above.</td>
</tr>
</tbody>
</table>

### 4. Implications

Each of the chosen approaches has advantages and disadvantages. Below we briefly summarise key implications of each approach along the continuum. Negative implications are in italics.

#### 4.1 Parallel systems

**Sustainability**
- Humanitarian financial flows to international agencies may create a parallel system with little incentives for governments to engage. Lack of government involvement may make further regulatory change in other areas favouring refugees unlikely.

**Accountability and political economy**
- Strong accountability along the individual funding chain to donors.
- Refugees might prefer to interact with the UN, not with government.
- *Potential conflicts with the host community if refugees are perceived to receive ‘unfair’ benefits.*

**Addressing needs and protection**
- *Lack of clarity from beneficiary perspective about various transfers available. Enrolment into the NGO led system can be haphazard and arbitrary.*
- Once in the system, there are likely strong protection mechanisms for the most vulnerable.
- Refugees may have different needs from nationals due to their social networks, ability to work, asset ownership etc., and a stand-alone system may tailor assistance and serve them better than a routine system.

---

3 Building on framework within O’Brien et al 2018
Coverage of population

- Targeting and coverage in the NGO catchment area often strong. But overall national targeting and coverage may be limited/patchy.

Cost and duplicated systems

- *Expensive due to multiple overheads, parallel systems and caseload overlaps (which are often impossible to monitor because of lack of data sharing).*

Timeliness and predictability

- Quickly to mobilise since part of standard delivery package in humanitarian operations.

4.2 Alignment

Sustainability

- Involvement of government may create a venue to discuss refugee regulation and may lead to reforms in other social protection regulation.
- *If multiple providers are involved, it is very time consuming to set up an aligned platform and to get NGOs to work together on a joint platform.*
- *NGOs will often tailor their aligned programme – even if it creates unsustainable systems i.e. they will likely have much more hands-on case management than many governments, they will likely have stronger VAM and protection mechanisms (to abide by humanitarian principles).*

Accountability and political economy

- *Full alignment entails an accountability problem – NGOs have to implement a programme that they would not themselves design and are held accountable by donors for reaching targets.*
- If alignment is complete, this is a very attractive option for governments. Refugees would be looked after in a way that does not alienate host communities and host governments have few fiscal responsibilities.

Addressing needs and protection

- *The transfer value is likely below the Minimum Expenditure Basket as considerations linked to host community perceptions will guide the setting of the amount.*
- Once in the system there are likely strong protection mechanisms for the most vulnerable (stronger than if government implementing alone).

Coverage of population

- *Coordinated case management across NGOs will lead to better coverage nationally.*
- Overall national targeting and coverage may be still be limited since NGOs have smaller capacity.
Cost and duplicated systems
• Expensive due to multiple overheads of different organisations parallel systems.

Timeliness and predictability
• Process of alignment is likely time consuming.

4.3 Piggybacking
Sustainability
• More likely to be a sustainable solution if humanitarian actors convince governments to take on the refugee caseload.
• Possible in FCAS where some institutions and systems exist; can help to maintain some of these systems during a crisis.
• NGOs will often tailor their piggybacked programmes – even if it creates unsustainable systems i.e. they will likely have much more hands-on case management than many governments, they will likely have stronger VAM and protection mechanisms (to abide by humanitarian principles).

Accountability and political economy
• Can be an option for working with and supporting existing national systems where donors cannot fund state actors due to the crisis.
• Requires very strong cooperation and coordination between the UN and donors to manage coherent relationships with the relevant government ministry.
• May require changes in SP legal frameworks since new entrants will register in the national SP database and will be served by national SP centres.
• Governments may be reluctant to take on the refugee caseload.

Addressing needs and protection
• Refugees unlikely to be well represented in any existing social protection registries and information systems – will require ad-hoc approach to registration, etc.
• Staff, institutions and processes of the social protection system need to be accessible to and able to communicate with refugees/IDPs – language, cultural, distance barriers etc. likely require additional support via NGOs/UN.
• Working through administrative staff of state programmes could support access in insecure areas, or create barriers if government does not have access there.
• The transfer value is likely below the MEB as considerations linked to host community perceptions will guide the setting of the amount.
• Once in the system there are likely strong protection mechanisms for the most vulnerable (stronger than if government implementing alone – with implications for sustainability).

Coverage of population
• Coverage of government systems is likely going to be reproduced.
• **Weaknesses of the underlying system may be transferred onto the emergency programme.**

**Cost and duplicated systems**
• Massively reduced overheads.
• Depending on the humanitarian financial instrument used, there may be scope to pay government for implementation.
• Can make use of some existing systems and institutions for time and cost savings – but only those that are strong enough and relevant for an emergency response.
• *Systems being piggybacked on, risk being overwhelmed, impacting on the long-term social protection system.*

**Timeliness and predictability**
• Likely to take a long time to set up, since is requires legal and policy change.
• *Slow-downs linked to coordination with government, government decision-making and existing legal/implementation/capacity constraints.*

**4.4 National systems-led**

**Sustainability**
• As for piggy-backing: more likely to be a sustainable solution if humanitarian actors convince governments to take on the refugee caseload.
• As for piggy-backing: Possible in FCAS where some institutions and systems exist; can help to maintain some of these systems during a crisis.
• *Protection mechanisms may be weak in national systems.*

**Accountability and political economy**
• Governments may be reluctant to take on the refugee caseload: refugees will become part of the national case load and may require funding from national budgets.
• *May require changes in SP legal frameworks since new entrants will be registered into the national social protection database and will be served by national referral centers.*

**Addressing needs and protection**
• As for piggy-backing: staff, institutions and processes of the social protection system need to be accessible to and able to communicate with refugees/IDPs – language, cultural, distance barriers etc. likely require additional support via NGOs/UN.
• The transfer value is likely below the MEB as considerations linked to host community perceptions will guide the setting of the amount.
• Protection mechanisms are likely to last beyond humanitarian funding horizons and offer long term protection in protracted settings.

**Coverage of population**
• People would be covered based on standard parameters independently of nationality.
• Weaknesses of the underlying system may be reflected into the emergency programme.

Cost and duplicated systems
• Can make use of some existing systems and institutions for time and cost savings – but only those that are strong enough and relevant for an emergency response.
• Systems risk being overwhelmed, impacting on the long-term social protection system.

Timeliness and predictability
• This may be swift or slow, depending on government capacity and legal changes required.

5. Conclusions
This paper presented a framework to help reconcile incentives of the many actors involved in connecting social protection and refugee-based humanitarian assistance. The analysis identifies several strategic options with comparative advantages and limitations.

Piggy backing and nationally-led delivery of humanitarian assistance are mechanisms preferred by donors since they offer a path towards integrating the humanitarian caseload into host country systems. However, the NGO community and national governments are likely to be more sceptical towards these approaches. National governments may be wary about embarking on a large financial and political commitments, often in a context of budget constraints and societal tensions. They may be afraid that, once on their books, refugees will remain part of the national social protection caseload permanently. National governments may be reluctant to extend benefits to refugees when they struggle to extend benefits to their own citizens. NGOs and international agencies, in turn, may be concerned of piggy-backing and nationally led approaches since they reduce their ability to shape programs and to ensure humanitarian principles are adhered to. Realistically, in the absence of ‘durable solutions’ there isn’t a sustainable route to supporting refugees. One way or another, international aid will fund relief and donors may be unlikely to persuade host countries to use their negligible tax base to support refugees.

Shadow alignment is a compromise whereby national governments have a true voice in the design of programs and can, to some degree, ensure it is coherent with national systems. This may occur without taking up management responsibilities and while keeping the refugee caseload separate from government accountability. From a donor perspective, shadow alignment may be seen as a way-station toward piggy-backing or nationally-led approaches.

Shadow alignment is time consuming to set up since it requires substantial negotiation between government and humanitarian partners. If there is no prospect towards piggy backing on at least some government systems, the strategy may not be a viable option to

4 See the HIP in Turkey (ECHO 2016), which stipulated this as an aim of the ESSN. It was omitted in later versions of the HIP.
pursue. Shadow alignment comes with many of the costs of piggy-backing and nationally-led provisions, without their benefits. Shadow aligned assistance likely compromises humanitarian principles by offering transfers below a basic-needs threshold. Since shadow alignment depends on a separate system for the delivery of the transfer, it does not benefit from overhead cost savings which accrue to piggy-backing or nationally led approaches.

Parallel systems are costly to deliver and rely entirely on humanitarian funding, making them unsustainable in protracted settings. They are easier to design in a way that meets humanitarian principles and allow host governments to stay in an ‘observer mode’ in providing humanitarian assistance to refugees.

It is important to note that actors do not need to choose one approach over another, and can pick and combine different options. Delivery partners may select, for example, parallel funding sources, combine them with piggy backing on the national system for registration, and align in payment delivery. Each context will lend itself to a different approach and it is useful to consider each element of the delivery chain separately rather than the delivery system in its entirety. Importantly, rolling out these combinations of engagement modalities will likely take time. But the patience required to undergo those delicate transitions will most probably pay out in long term in terms of assisting refugees in the most cost-effective way possible.
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<table>
<thead>
<tr>
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<th>Authors</th>
<th>Publication Date</th>
</tr>
</thead>
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ABSTRACT

The debate on if and how to connect humanitarian assistance for refugees with national social protection systems can elicit polarizing views. Hence, it is not unusual to observe country-level approaches getting somewhat ‘stuck’ – especially where refugees represent a sizable share of the population: from a donor perspective, the question is how can governments be persuaded to be more inclusive; from a government standpoint, it faces disproportionate political and economic risks from “being left with the bill”; and from the international humanitarian agencies viewpoint, there might be quandaries on how to reconcile commitments to neutrality and independence with those to respecting the primary responsibility of governments. These stylized views are legitimate, but their combined effect may generate competing narratives and little negotiating space among the multiple actors involved. The net result might be the endurance of a sub-optimal dual systems operating in parallel – one for refugees, one for citizens. The framework laid out in this paper attempts to facilitate the identification of workable pathways for progress among actors. Instead of framing the humanitarian-social protection links as an ‘either-or’ choice, the framework includes a more granular analysis of how collaborations may emerge around select programmatic ‘functions’, as well as the ‘degrees’ of possible connection between national and international support within a given function. While work in progress, such analytical approach is already emerging from country practices and withholds the potential to help ‘unstick’ the debate.

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