



For a world without hunger

Study on the National Policy on Internally Displaced Persons

Welthungerhilfe



Monica Sandri January 2018

Acknowledgements

Welthungerhilfe would like to express its gratitude to the Ministry of Refugees and Repatriation for the support provided during the implementation of the study with the provision of background documents and information, and for the thorough review of the draft.

Welthungerhilfe would also like to express deep gratitude to all the people who participated in the key informant interviews (KII) and in the focus group discussions (FGDs). This includes officials from various government and non-government institutions and the United Nations as well as members of the communities who provided their valuable time to be interviewed.

TABLE OF CONTENT

TABLE	OF CONTENT	2
ACRO	NYMS	3
EXEC	JTIVE SUMMARY	5
Α.	Summary of the key findings	5
в.	Summary of key recommendations	
SECTI	ON 1 – SCOPE OF THE STUDY	10
C. I	Research Objectives	10
D.	Research Questions	11
SECTI	ON 2 – RESEARCH METHODOLOGY	13
Α.	Research approach	13
В.	Data collection	
1.	Key Informant Interviews	13
2.	Focus Group Discussions	14
C. (Challenges	14
SECTI	ON 3 - FINDINGS	15
Α.	Main national policies and instruments related to displacement	15
1.	The National Policy on Internally Displaced Persons	
2.	The Policy Framework for Returnees and IDPs	16
3.	Durable Solutions Working Group	17
4.	Citizen's Charter	17
5.	The Multi-Dimensional Integration Index	
В.	Awareness and implementation of the Policy	
1.	Level of awareness of the Policy	
2.	Assessment of the level of implementation of the IDP Policy	20
C. I	Progress and limitations in providing durable solutions	24
D.	Monitoring the IDP Policy	
E. 1	he Policy in the current context	29
SECTI	ON 4 – CONCLUSIONS AND RECOMMENDATIONS	32
ANNE	X 1 – STUDY TERMS OF REFERENCE	

ACRONYMS

AIHRC	Afghanistan Independent Human Rights Commission
ANDMA	Afghanistan National Disaster Management Authority
ARAZI	Afghanistan Independent Land Authority
CDC	Community Development Council
DiREC	Displacement and Return Executive Committee
DoRR	Directorate of Refugees and Repatriation
DPR	Department of Population Registration (Ministry of Interior)
DRC	Danish Refugee Council
DSWG	Durable solutions Working Group
FGD	Focus Group Discussions
IDLG	Independent Directorate for Local Governance
IDMC	International Displacement and Migration Center
IDP	Internally Displaced Persons
KII	Key Informant Interviews
IOM	International Organization for Migration
MDI	Multi-Dimensional Integration Index
MoF	Ministry of Finance
MoRR	Ministry of Refugees and Repatriation
MRRD	Ministry or Rural Rehabilitation and Development
NRC	Norwegian Refugee Council
NSP	National Solidarity Programme
OCHA	Office for the Coordination of Humanitarian Affairs
OCE	Office of the Chief Executive
PAP	Provincial Action Plan
RWG	Reintegration Working Group
ТоТ	Training of Trainers
UNAMA	United Nations Assistance Mission to Afghanistan
UN-Habitat	United Nations Human Settlements Programme
UNDP	United Nations Development Programme
UNHCR	United Nations High Commissioner for Refugees
WHH	Welthungerhilfe

About Welthungerhilfe in Afghanistan

Welthungerhilfe¹ was founded in 1962 as the National Committee of the Freedom from Hunger Campaign set up by the United Nations Food and Agricultural Organization (FAO). Non-profit making, non-denominational and politically independent, the organization is run by a board of honorary members under the patronage of the President of the Federal Republic of Germany. Today, it is one of the largest, nondenominational and nonpolitical German NGOs in development co-operation and emergency relief.

Welthungerhilfe's overall objective in Afghanistan is to reduce the level of poverty while improving the livelihoods for the most vulnerable population. Welthungerhilfe's activities in Afghanistan began back in 1980 - immediately after the former Soviet Union's invasion - to provide emergency aid for refugees. Welthungerhilfe works in the areas of food and nutrition security, durable shelter provision, rural development and basic infrastructure, WASH, natural resource management and disaster risk reduction. Welthungerhilfe is present in the provinces of Kabul, Nangarhar, Jawzjan and Samangan.

In Kabul Province, Welthungerhilfe focuses on integration and reintegration support and protection for vulnerable and marginalized internally displaced people and Afghan returnees, including supporting the Government in moving forward with the implementation of the Policy. To help the Afghan Ministry of Refugees and Repatriation (MoRR) to actively play its role as advocate for Internally Displaced Persons (IDPs), Welthungerhilfe in 2016 delivered two comprehensive workshops to enhance MoRR officials' knowledge of the Policy and enable them to implement it at National and sub-national levels. In November 2016 WHH organised also a national conference to discuss on the opportunities and challenges regarding durable solutions for Afghan returnees and IDPs. The conference brought together more than 100 key representatives from numerous organizations and agencies, including the government, UN, Embassies, NGO and media. Welthungerhilfe is also part of the Displacement and Return Executive Committee (DiREC) as representative of the NGOs.

About the Consultant

Monica Sandri has worked for more than 20 years in crisis and post-crisis countries focusing her work on the socio-economic integration of refugees and internally displaced people as well as on developing the capacities of governments and civil society organizations at national and sub-national levels. She has worked in the Democratic Republic of Congo, the Republic of Congo, Guinea, Afghanistan, Myanmar, and Somalia. Her experience in Afghanistan includes working with UNHCR, IOM and WFP as well as with the Ministry of Rural Rehabilitation and Development, as Social Protection Advisor, and most recently with the Administrative Office of the President to support the establishment of an autonomous training capacity. Some of her works include the development of the UNHCR's South-East Myanmar Durable Solutions Framework and the UNHCR's Somalia Reintegration Strategy. Since July 2015 Ms. Sandri is working for ATR consulting in Afghanistan as Capacity Development Director. In this capacity she has lead government institutions capacity gap assessments and the development of capacity building strategies. Ms. Sandri also lent her experience to the analysis of chronic and acute challenges faced by IDPs, refugees, and returnees to craft actionable recommendations for programmatic and policy responses.

¹ https://www.welthungerhilfe.de/en/refugees-afghanistan.html

EXECUTIVE SUMMARY

Launched in 2014, the National Policy on Internally Displaced Persons (IDPs)² in Afghanistan has suffered from slow implementation, uneven government commitment and institutional understanding, and a limited capacity to operationalize. This instrument, designed to protect the rights of the displaced citizens in Afghanistan, was developed and approved by the Government of the Islamic Republic of Afghanistan (GoIRA) in 2013. Yet, its implementation has been difficult since its inception. Therefore, Welthungerhilfe (WHH), with funding from the German Government, commissioned a study in August 2017 to take stock of the implementation of the National IDPs Policy, and to formulate recommendations for improving its implementation.

The study was carried out during the months of September and October 2017. By interviewing government officials, UN agencies, NGOs, community representatives as well as through focus group discussions with IDPs, returnees and host community representatives, both male and female, and by undertaking a desk review of key documents, this study aims to bring to light the challenges of the policy formulation and implementation regarding IDPs in Afghanistan. All interviews were carried out in Kabul city, and in Bagrami district of Kabul Province, where Welthungerhilfe is currently implementing a programme, funded by the Ministry of Economic Cooperation and Development (BMZ) in support of communities affected by displacement. The research study is part of the Welthungerhilfe initiative to support the Government of Afghanistan in moving forward with the implementation of the Policy in Kabul Province.

A. Summary of the key findings

The study shows that although there is a general awareness of the Policy among most stakeholders, especially those directly involved in its implementation, government officials do not always know the Policy in detail or understand their role in implementing it. This is particularly true for government actors at the provincial level, who are reportedly unable to abide by the principles set out in the Policy, as in many cases they are not aware of the procedures or their exact responsibilities. Communities complain of the limited outreach of the government not only in informing displaced people about their rights, but also in delivering services. Services delivered are considered of poor quality and insufficient to cover the needs of both host and displaced communities. Competing political priorities, and the turnover of government officials are identified by informants as being among the main hindrance to disseminating and implementing the Policy, particularly at the provincial level.

The Policy addresses IDPs' needs through preventing displacement, assisting and protecting IDPs while in displacement, and supporting durable solutions³. The government recognized that most of its actions have been primarily focused on providing humanitarian assistance, with little efforts to prevent displacement and support durable solutions. NGOs and UN agencies highlight some positive outcomes from the implementation

² http://morr.gov.af/en/Documents

³ Durable solution is defined in the Policy as "a sustainable solution (whether return, local integration or resettlement), as a result of which the former IDPs no longer have needs specifically related to their displacement and can enjoy the same rights as other Afghans", National Policy on Internally Displaced Persons, p. 9

of the provisions set in the Policy such as increased access for IDPs without *tazkera* to education and health services. However, IDPs interviewed in Kabul province reported far greater challenges in accessing public services without civil documentation, with IDP children reportedly being turned away from schools when unable to provide documentation.

Durable solutions have remained focused on return and reintegration, with reports of government institutions pushing for people to return too soon to areas where security was still a concern. However, thanks to the commitment of the local government in its implementation of the Policy, and the engagement of some international partners, a successful integration process is underway in Herat. Local integration, and relocation, have often been rejected as potential options, especially when their sustainability is linked to security of land tenure. In Kabul province, receiving communities are willing to share resources with the displaced and to consider them as part of their communities, yet they resist to the provision of land to IDPs.

Another key problem to the achievement of a sustainable integration is that services such as access to water, health, and education are insufficient in terms of quality and quantity. Displaced, as well as host communities, would like the government to provide better services and more stable access to livelihood opportunities. They do not trust the government's capacity to fulfil its commitments, nor to deliver services in an equitable manner. Communities also feel abandoned by the international community, which allegedly rarely carries out assessments or monitors the delivery of assistance, relying mainly on information provided by the government.

Violations of the Policy's principles do happen, but reports on this are rare and sporadic, with no system to ensure government accountability, nor to allow communities to file complaints and receive feedback. In fact, the Policy does not have a monitoring system currently in place. Most respondents acknowledged the need to have a monitoring system with clear indicators to measure progress on implementation, identify shortcomings, and any violation of the principles.

While the Policy is considered good in its objectives and principles, the majority of the respondents believe that the Policy needs to be reviewed and updated, with government capacities strengthened at all levels to ensure its operationalization. The Policy is believed to have been too ambitious in terms of expectations, ultimately unrealistic in regard to the capacities and constraints that the government has in fulfilling its responsibilities.

Essentially, the implementation modalities failed to reflect properly the complexity of the Afghan context, lacking efficient and effective instruments, and a proper budget to make it operational⁴. While new instruments that support the implementation of the principles enshrined in the IDPs Policy are being developed, such as the Displacement and Return Executive Committee (DiREC) action plans, the government and its partners need to reflect on what could be the best mechanisms and modalities to bring forward sustainable solutions for the displaced.

⁴ While the Inter-Ministerial Coordination Committee on Refugees, Returnees and IDPs (IMCC) chaired by MoRR, has the responsibility to recommend budgetary provisions for the implementation of the IDP Policy, the Ministry of Finance has the responsibility, among others, to (a) allocate adequate budget and funding to MoRR to meet the needs of IDPs; and (b) build the capacity of the MoRR in designing realistic budget and funding proposals to the MoF, National Policy on Internally Displaced Persons, p. 9, 53 and 54)

B. Summary of key recommendations

Increase awareness of the Policy in particular at sub-national level and among government partners

- 1. Design and implement an awareness strategy that targets communities affected by displacement. The design of provincial awareness strategies must be part of Provincial Action Plans, use different means and media, and must have a budget.
- 2. Conduct awareness of the IDPs Policy and implementation plan, particularly targeting government officials at provincial level and those civil servants directly involved in the implementation of the Policy. In provincial capitals, also target key municipal departments and *nahia* staff, as well as municipal advisory boards.
- 3. Edit terms of reference of relevant line ministries staff at the national and provincial levels to reflect their responsibilities as contributors to the implementation of the Policy.
- 4. Enhance information sharing and awareness of durable solutions. Communities affected by displacement need to be better informed of the various options, strategies, and current possibilities in order to make a more informed choice. Government officials need a better understanding of the Policy principles related to durable solutions, and how they can support each of these solutions. Coordination and collaboration among different actors (government, UN, NGOs and communities affected by displacement) must also be strengthened for the implementation of a comprehensive support to durable solutions.
- 5. Organize workshops to understand factors that block the understanding and therefore the implementation of durable solutions, and carry out site visits to places where the implementation of the Policy was relatively successful. This approach can be used to instigate attitude changes, and unlock solutions

Improve implementation through proper planning, budgeting, management structures, coordination, and capacity development

- 6. Ensure that proper and sufficient budget is developed also for dissemination, awareness, and coordination, as well as regular monitoring and evaluation of the Policy.
- 7. Develop government officials capacities in all steps of the awareness, implementation, and monitoring of the Policy. Make sure that capacity development activities target institutions at different levels, particularly civil servants who implement activities in the field.
- 8. Improve management structures to hold the government accountable at all level, identifying and addressing weaknesses and obstacles in managing the implementation of the Policy.
- 9. Assess how IDLG could provide enhanced support to displaced populations in provincial capitals/urban areas through its municipalities, especially at *Nahia* level.
- 10. Develop a detailed understanding of the challenges and opportunities related to durable solutions. As there are durable solutions experiences that are successful with others less successful, it is important to have a detailed understanding of what has worked and what has not, and why, so

that to replicate and adapt successful experiences. Differences in the contexts need to be considered as, for example, what worked in Herat might not necessarily work in Kabul.

- 11. Engage with Citizens' Charter and its CDCs. The Citizens Charter creates opportunities for IDPs to be included in local governance and in community development decision and implementation mechanisms.
- 12. Strengthen activities that address prevention and preparedness. For instance, develop contingency plans for communities to deal with the arrival of displaced; or allocate resources, such as block grants that can be rapidly deployed to communities when an influx of IDP occurs; or enhance understanding of what are the reasons that induce some people to move and other to stay and design activities that can strengthen the resilience of the people remaining.
- 13. Increase livelihood opportunities exploring, poverty graduation models which, combining relief assistance with capacity building measures, enable the poorest individuals and households to move out of poverty. Enhance engagement of the private sector, as it is key in creating economic opportunities in particular where there are large numbers of displaced/returnees.
- 14. Due to the complexity of Kabul city and province, and the size of displacement, dedicate robust efforts in planning, budgeting, and implementation of Kabul Province Action Plan (PAP). In particular:
 - Engage IDPs, returnees, and host communities at the earliest possible point, ensuring extensive and frequent consultations, especially when planning for solutions.
 - Prioritize area based projects that support the entire community, not just specific areas (e.g. water systems, education or health services, and infrastructures). Plan activities through extensive consultations with affected communities to maximize local ownership.
 - Consideration should be given for the Kabul PAP to be broken down into smaller areaspecific plans, designed in close collaboration with community representatives. A few locations that have potential for success can be piloted, and evaluated before eventually rolling out a full PAP.

Develop, involving all stakeholders, a monitoring system to be used by government and partners

- 15. Develop a monitoring system with solid indicators to measure progress on implementation, with clear reporting mechanisms. Ensure that communities affected by displacement are able to contribute to the design and implementation of the monitoring system. Review the DiREC monitoring system with a view to identify collaborative opportunities for the monitoring of the Policy.
- 16. Identify modalities for the development of complaint mechanisms that will allow displaced communities to report on stakeholders' non-compliance with the Policy principles.

Review the Policy based on lesson learned and best practices

17. Analyse the actual feasibility of the guidance for implementation of the Policy. Current guidance for addressing IDPs challenges shall be thoroughly analysed to understand their actual feasibility and enable the development of pragmatic alternatives.

- 18. Consider specificity of each single context, the current and foreseen challenges, and the capacities and resources of the government.
- 19. Review the Policy based on evaluations and lesson learned aimed at appraising the implementation of the Policy in different geographical areas, as well as the development and implementation of the PAPs. This could be done through a national workshop that brings together different provinces and stakeholders, sharing challenges and best practices



SECTION 1 – SCOPE OF THE STUDY

In August 2017, with funding from the German government, Welthungerhilfe commissioned the "Study on the National Policy on Internally Displaced Persons" with the overall objective" to take stock of the implementation of the IDPs Policy and to formulate recommendations for improving its implementation".

The National Policy on Internally Displaced Persons (IDPs) was developed and then endorsed in November 2013 and launched by the Government of the Islamic Republic of Afghanistan (GoIRA) in February 2014 in response to the huge caseload of IDPs within Afghanistan. It is a national instrument designed to protect the rights of the displaced citizens of Afghanistan. Although the IDP Policy has been well received, its implementation has been slow and complicated. Three pilot provinces (Nangarhar, Balkh and Herat) were chosen in which an implementation plan was to be established. This has been achieved with mixed results, based on the degree of provincial officials' commitment, their capacity, their understanding of the IDP Policy, and the complicated relationships between the various line ministries.

The present evaluation considers the efficacy and relevancy of the IDP Policy from an NGO perspective, to assess how the IDP Policy has helped (or not) to address the needs of IDPs at field level, and make their demands more visible. The evaluation is multi-sectorial, and was conducted in a participatory manner, involving communities, NGOs working on the ground, UN agencies and government officials. Data collection with IDPs took place in Kabul Province, Bagrami district.

The research is part of the Welthungerhilfe initiative to support the Government of Afghanistan in moving forward with the implementation of the Policy in Kabul Province. The results of the research will be presented at a National Conference on displacement organized by Welthungerhilfe in 2017 and to the relevant clusters and working groups, in particular the Durable Solutions Working Group.

C. <u>Research Objectives</u>

The overall objective of the study "to take stock of the implementation of the IDPs Policy and to formulate recommendations for improving its implementation" was met through answering to the following overarching questions:

- 1. How has the Policy helped in addressing the actual needs of the IDPs and in making their demands more visible?
- 2. Is the Policy relevant and applicable to the current context? What adjustments, if any, can be recommended to the government?
- 3. What are the main challenges and obstacles to integration and what has been the impact of the Policy, and of the instruments⁵ which facilitate reintegration, on IDPs and returning refugees' integration

⁵ The main instruments and coordination mechanisms to facilitate integration of internally displaced and returnees are: National IDP Policy National and Provincial Action Plans, the Displacement and Return Executive Committee (DiREC) Policy Framework Action Plan and the Technical Working Groups, and the Durable Solution Working Group (DSWG).

process?

4. What principles and approaches should guide the development of an effective integration/reintegration monitoring system?

D. Research Questions

The study questions, which have led the design of the data collection tools, were developed to respond to the above four overarching research questions.

The questions were divided into two categories, those which relate to building an understanding of the current situation and those which relate to possible future actions to be taken by the stakeholders, the Government in particular, to improve the Policy implementation. The table below shows the study questions, their relation to the four overarching research questions, and the tools through which each question were asked. Each question was elaborated differently depending on the targeted respondent.

Questions	Overarching	ΤοοΙ
Current Situation	Question	
Is the Policy known, understood and used by stakeholders?	1 - 2	KII, FGD
Are the principles outlined in the Policy upheld by the government?	1-2	KII, FGD
Are the roles and responsibilities fulfilled by the different actors as outlined	1-2	KII, FGD
in the Policy?	1-2	KII, FGD
Is the Policy relevant and applicable in the current situation?	2	KII
How has the Policy been implemented in relation to prevention, protection	1 – 2	KII, FGD
and assistance during displacement, and durable solutions?		
What are the main outcomes of the implementation of the Policy?	1 -3	KII
What are the main difficulties encountered in the implementation of the	1-2	KII
Policy?		
What are the main challenges and obstacles on IDPs and returnees'	1-3	KII, FGD
integration?		
Are the instruments available effective in addressing	3	KII
integration/reintegration needs of communities affected by displacement?		
What are the actions taken by the government to address the	1-3	KII, FGD
integration/reintegration needs of communities affected by displacement?		
Have displacement affected communities been involved in planning,	1 - 4	KII, FGD
implementation and monitoring of integration/reintegration plans?		
Has the implementation of the Policy improved the conditions of	1 - 3	KII, FGD
communities affected by displacement?		
Has been a monitoring system designed?	4	KII
Is the implementation of the Policy monitored and in case by whom? How	4	KII
are the findings used?		

Study on the National Policy on Internally Displaced Persons

Possible Recommendations		
What can be done to enhance awareness of the Policy among the different	1 - 2	KII, FGD
stakeholders?		
How the government can be better accountable in upholding the Policy	1 - 2	KII, FGD
principles and in fulfilling its roles and responsibilities?		
How could the Policy be adapted to the current situation? And the	2	KII
instruments?		
What could be done to improve the Policy implementation and enhance its	1 – 2 - 3	KII, FGD
effectiveness in relation to prevention, protection and assistance during		
displacement, and durable solutions?		
What could be the possible solutions to the current challenges and	1-3	KII, FGD
obstacles to a sustainable integration of IDPs and returnees?		
How can the involvement in planning, implementation and monitoring of	1 – 2 – 3- 4	KII, FGD
affected communities be enhanced?		
How an integration/reintegration monitoring system should be developed	4	KII, FGD
to be effective? What principles should guide indicators and tools		
development? What approach should be taken to monitoring?		



SECTION 2 – RESEARCH METHODOLOGY

A. <u>Research approach</u>

The study targeted two levels, national and sub national. The national level looks at the implementation of the Policy nationwide, while the sub-national focuses on the impact of the Policy as well as the integration/reintegration instruments on IDPs and returning refugees in Kabul province, where WHH is working to support communities affected by displacement.

The study was conducted over a period of three months from the end of August to the end of November 2017, with a period of about three weeks dedicated to data collection.

B. Data collection

1. Key Informant Interviews

A total of 25 Key Informant Interviews (KII) was carried out at national and sub-national levels.

At the <u>national level</u> with:

- Government and United Nations, included Ministry of Refugees and Repatriation (MoRR), Afghan National Disaster Management Authority (ANDMA), President Office, Independent Directorate for Local Governance (IDLG), Ministry of Finance, UNHCR, OCHA, IOM, UN Habitat and UNDP
- Main NGOs, such as NRC, DRC, Care and Terres des Hommes supporting the implementation of the IDP Policy at national level through their programming and relevant clusters lead and working groups.

At sub national level with:

- Representatives of communities affected by displacement (i.e representatives of communities where substantive displacement or return has taken place in Kabul province, representatives of IDPs)
- Key government, such as the Provincial Directorate of Refugees and Repatriation (DoRR) and the Provincial Governor Office, UN and NGOs staff involved in the implementation of IDP Policy as well as on IDP and returnees' integration programming in Kabul Province.

Three different KII guiding questionnaires were developed to be used to interview the following groups:

- Tool 1: KII with government, UN and NGO at national level
- Tool 2: KII with government, UN and NGO at sub-national level
- Tool 3: IDPs and communities representatives

Each KII lasted between 45 minutes and one hour. The KII were carried out by the Consultant supported by a team of national Researchers. All interviews were audio-recorded with prior consent from respondents. Many of the respondents requested to remain anonymous.

Study on the National Policy on Internally Displaced Persons

2. Focus Group Discussions

Six Focus Group Discussions (FGDs) with members of communities affected by displacements including women and beneficiaries of WHH programming were carried out in Bagrami District:

- Two with host community members (male and female) in Momen Abad
- Two with IDPs (male and female) in Pul Shina
- Two with returnees (male and female) in Mohsen Qala

Each FGD lasted between two and three hours and were carried out by the national Researcher Officer supported by the national Assistant as note taker. The objectives of the study and the manner in which findings and contributions of participants would be used were explained to all participants in detail prior to the commencement of data collection.

Three FGD guiding questionnaires were developed to be used to interview the following groups:

- Tool 4: FGD with host community members
- Tool 5: FGD with IDPs
- Tool 6: FGD with returnees (IDPs and refugees)

Transcriptions was carried out for all data collected and all transcriptions in Dari or Pashto were translated in English.

C. Challenges

Difficulties in having appointments with key informants: The consultant sent out e-mails in English and Dari to all potential respondents explaining the objective of the research and the main questions and requesting appointments. E-mails were also followed by phone calls when phone numbers were available. Most of the potential respondents had to be contacted two or three times before getting the appointments. A few never replied (Citizen Charter and ARAZI) and, by the end of the data collection period, were replaced with other respondents.

Most respondents could only respond freely under conditions of anonymity: Many respondents, staff of international organizations in particular, requested to remain anonymous or not to mention the organization. One respondent had to be replaced because the formal authorization from the supervisor to respond to the interview was never granted.

Lack of knowledge of the topic of the study and understanding of the context by some of the respondents: Despite the objective and the main questions were included in the e-mail and in some cases the questionnaire was also sent in advance, it was in some cases unclear, due to staff turnover, who in the organization could have been the best person to participate in the interview. Some of the respondents who accepted to be interviewed had a very limited knowledge and understanding of the Policy and the context in which displacement, and solutions occur.

SECTION 3 - FINDINGS

A. Main national policies and instruments related to displacement

These findings derive from the desk review of available documents, reports and minutes of meetings as well as from individual interviews. This part looks at existing national policies related to internal displacement and durable solutions as well as their implementation plans, coordination and monitoring mechanisms.

1. The National Policy on Internally Displaced Persons

The **National Policy on Internally Displaced Persons (IDPs)** was endorsed in November 2013 and launched in February 2014. The Policy is a national instrument designed to protect the rights of the displaced citizens of Afghanistan. The Ministry of Refugees and Repatriation, the Office of the Administrative Affairs of the Council of Ministers and other respective ministries and entities are tasked to implement it⁶.

According to the Policy a **National Implementation Plan** should be prepared by MoRR on an annual basis. The first Plan should have been completed within six months of the adoption of the Policy⁷, but it has not been drafted yet.

The development of **Provincial Action Plans (PAP)** should be led by Provincial Governors through a provincial IDP task force. Provincial task forces should have been established, in main provinces affected by displacement, within one month of the adoption of the Policy. Each task force should gather and analyse data and develop a PAP to find durable solutions for the IDPs within three months of its establishment⁸. It was planned to adopt a bottom-up approach with provincial plans informing the development of the national plan. Provincial plans were drafted, although with mixed results, in three pilot areas: **Herat, Balkh** and **Nangarhar**. In Herat the plan has led, in particular, to the regularization of Maslakh IDP settlement and the delivery of development projects by the UN and NGOs. Maslakh is considered by many among the Government and its partners "the successful result of the implementation of the Policy". Balkh plan was drafted but not approved, and Nangarhar is the most recent having been drafted. The launch of the Kabul Provincial Action Plan, coordinated and facilitated by WHH, took place in Kabul on 11 October 2017.

The implementation of the Policy shall be monitored by an **oversight mechanisms** established by MoRR Monitoring and Evaluation Unit, together with Afghanistan Independent Human Right Commission (AIHRC) and the Monitoring and Evaluation Directorate of the Administrative Office of the President. However, no monitoring mechanism or framework currently exists and no systematic monitoring is carried out. Since the endorsement of the Policy, MoRR, both at national and sub-national level, was supported by international organizations in creating awareness of the Policy among government, UN, NGOs, local communities and IDPs.

⁶ National Policy on Internally Displaced Persons, p.4

⁷ National Policy on Internally Displaced Persons, p.51

⁸ National Policy on Internally Displaced Persons, p.71



2. The Policy Framework for Returnees and IDPs

At the end of 2016, the Government drafted the Policy Framework for Returnees and IDPs. The Policy Framework takes into account the National Policy on Internally Displaced Persons and the Comprehensive Voluntary Repatriation and Reintegration Strategy, approved by the Government in 2015. Focusing on Durable Solutions for returning refugees and IDPs, the Policy Framework governs humanitarian and development assistance with the aim of transitioning humanitarian assistance to durable solutions as soon as possible with a "whole of community" approach. Implementation of the Policy framework is led by the **High Migration Council**, chaired by the President of Afghanistan (defining national Policy and resolving issues of Policy interpretation and updating); the **Council of Ministers' Sub-Committee on Migration Affairs** chaired by the Chief Executive (main decision-making body on operational issues) and which Secretariat is provided by MoRR; and the **Displacement and Return Executive Committee (DIREC)**. DIREC, chaired jointly by representatives from the Office of the Chief Executive (OCE), MoRR, and the United Nations Assistance Mission to Afghanistan (UNAMA), leads and oversee the implementation of the Policy Framework. Membership of DiREC comprises representatives from the Office of the Office of the President, the National Security Council, the Ministry of Finance, Ministry of Foreign Affairs, and the Office of the State Minister for Disaster Management and Humanitarian Affairs, ARAZI, the World Bank, UNHCR, IOM and OCHA.

DiREC has established three working groups to address **policy**, **technical** and **financia**l issues and is establishing three Technical Sub-working Groups (Livelihoods, Land and Data). Among others, DiREC develops Policy guidance for the allocation of land for returnees and IDPs. The **Presidential Decree on Land Distribution for Housing to Eligible Returnees and IDPs (Decree 104)** is being revised to include also IDPs and Martyrs families as beneficiaries of land allocation schemes.

DiREC has drafted a unified **national action plan** which brings together issues related to IDPs as well reintegration of returning refugees, and has started the development of **provincial action plans (P-DiREC)** in Nangarhar.

A **monitoring cell** within the DiREC has been established and is tasked to identify key issues, track progress on the implementation of the Action Plan, and provide public updates on a regular basis. DiREC is a member of the Durable Solutions Working Group.

The implementation of the DiREC Action Plan is reported as being initiated in particular in regard to land allocation and education. On land allocation, viable sites have been identified and a land allocation and beneficiary selection process is currently being put in place. In regard to education, it is reported that additional teachers are being recruited particularly in areas of high return and displacement⁹.

3. Durable Solutions Working Group

In June 2017 the Reintegration Working Group became the **Durable Solutions Working Group (DSWG).** It is chaired by MoRR and co-chaired by UNDP, IOM and UNHCR on rotation. The DSWG is a platform for information sharing and decision-making at the planning and programmatic levels, and between the national level and the field. The objective of the DSWG is to coordinate humanitarian and development stakeholders, initiatives and activities in Afghanistan with a view to developing a durable solutions strategy for returnees and IDPs, identifying, mapping, addressing and monitoring major needs and gaps; to improve information gathering and exchange; to develop evidence-based recommendations; and to jointly mobilize resources for reintegration and inter-agency activities. The DSWG is the primary mechanism through which the UN and NGOs coordinate the planning and programming of durable solutions for IDPs and returnees while ensuring close linkages with the DiREC¹⁰.

4. Citizen's Charter

The **Citizen's Charter**, a National Priority Programs, seems to have a great potential to support IDPs and returnees, allowing them to be part of local governance and development decision making mechanisms. In relation to IDPs' and returnees' integration the Citizen's Charter states that all IDPs and returnees will have equal rights and say in CDCs and have the right to take part in CDC elections, community project prioritization and activities. This is ensured through a mechanism which allows to exceptionally vote two additional members (one male and one female) in order to include IDPs and returnees, in the case that more than 20 IDP or returnee families settle in a community where a CDC has already been formed¹¹.

Returnees and IDPs will also be clearly identified as households during the community mapping and well-being analysis, to ensure they benefit equally and equitably from the subprojects and the labour generated through the subprojects' implementation. All returnees and IDPs will have access to the same minimum services, both in rural and urban areas and informal settlements will be covered through a total area development approach with the minimum service standards. The Citizens' Charter, differently from the National Solidarity Programme covers also urban areas, and *Nahias* with more informal settlements will be prioritized in district selection. In

⁹ Reintegration Working Group (RWG) Minutes, 13 June 2017

¹⁰ Terms of Reference, Durable Solutions Working Group on Displacement and Return (DSWG), 16 June 2017

¹¹ http://www.acbar.org/upload/1474264894316.pdf

Kabul province, Bagrami, Chahar Asyab, Khaki Jabbar, Guldara and Musayi are targeted under the first phase of the Citizen's Charter.

In July 2017 the Ministry of Finance signed a financing package with the World Bank which includes USD 172 million in additional financing to the Citizens' Charter Afghanistan Project to support communities with internally displaced persons and returnees from Pakistan¹²

5. The Multi-Dimensional Integration Index

Supported by the former Reintegration Working Group, now DSWG, to assess the integration of displaced populations and returnees in Afghanistan the **Multi-Dimensional Integration Index (MDI)** was designed and piloted. The MDI aims to have a consolidated data collection system to provide a baseline on the integration of displaced and returnee groups. The MDI training for the members of the DSWG was planned to take place in July 2017¹³. It appears that the MDI is on hold pending strategic decisions and financing for its implementation.

B. Awareness and implementation of the Policy

This section looks at the awareness of the IDP Policy at national and subnational level and across stakeholders and whether and how the principles enshrined in the Policy have been implemented to meet the needs of the displaced.

1. Level of awareness of the Policy

Respondents from institutions, whether from the Afghan government or the international community are all aware of the Policy, and believe that there is a general awareness of the Policy and its principles amongst most of the stakeholders, in particular those who are directly involved in its implementation. The Policy was circulated both at national and sub-national levels and workshops, awareness and training sessions were carried out by UN agencies and NGOs and provincial authorities supported in developing the action plans. In the government, awareness seems to be stronger at national level, than at sub-national level.

"There is a general awareness at the central level but that doesn't really go wider into the field, with the result that is missed at the provincial level and then obviously displaced communities are even lesser informed" (UN)

"Awareness must go beyond national level to provincial authorities and communities" (NGOs)

At sub-national level, awareness is reported to be weaker among partner line ministries than in the Provincial Directorates of MoRR (DoRR), affecting the implementation of the Policy.

¹²http://www.worldbank.org/en/news/press-release/2017/07/12/government-of-afghanistan-signs-new-financing-package

¹³ Reintegration Working Group (RWG) Minutes, 13 June 2017

"I think that there is a general level of awareness of the Policy in MoRR but not necessarily in the other ministries and this is where the problem lies" (NGO)

"The National IDP Policy says that children should have access to education so you can go to the school director or to the department of education and say that this is the document and you should implement it. It is good that we can intervene on an ad-hoc basis but I don't think this should be the way. The government should make sure that every school director around the country is aware that IDP children can enrol in school. This should be the Ministry of Education's responsibility.".(UN)

For some of the respondents, competing political priorities and the turnover of government officials are among the main problems slowing down the awareness process, resulting in a slow implementation of the Policy in particular at the provincial level. This turnover happened after President Ghani took office and appointed new Provincial Governors and Ministries' leadership, replacing officials who had already been made aware of the Policy.

"When the Policy was endorsed, that was the time of the presidential election, a political transitional time, and overall every Governor and Minister and other authorities were busy with the election and the IDP Policy was endorsed at that time, so that was a big challenge. For example, when we were briefing one governor about the IDP Policy, just immediately after briefing him he was changed and replaced by another governor. A second time we went to the province and explained the Policy and again for the second time the governor changed and another governor came" (Government)

"There are still gaps in disseminating and circulating the Policy. Still there are gaps in the government, communities, NGOs and donors. We are working on it" (Government)

In Kabul province some awareness-raising activities were conducted but did not go below high level government officials. The number of issues dealt with in the Afghan capital, and the complexity of the relations between the central, municipal and provincial administrations seem to have been an obstacle in the dissemination of the Policy at grass root level. Indeed, the current sub-national governance system is structured in a way that marginalises large urban areas. Provincial directorates of line ministries have front line workers at the district levels (so mostly in rural areas), but not in provincial capitals (which is the case of Kabul), which constitute a district without a specific office staffed with frontline workers.

"My feeling is that there is much more understanding in other provinces compared to Kabul. Maybe because of different reasons – lots of activities in Kabul and engagement of authorities in other activities that are not related to IDP" (UN)

"For example if we organise any awareness session at the Kabul Governor office there you have all the heads of departments who are covering the rural areas. But for the urban areas you don't have their representation or even if you have it, the person attending is not in the position to disseminate the information – so this makes it complicated. (UN) "Although there are lots of IDPs within the city, in all the meetings I didn't see much involvement of the Nahia¹⁴." (UN)

In Kabul province, IDPs, returnees and community representatives, although generally aware of their rights as Afghan citizens, are not aware of rules or regulations protecting the rights of the displaced. Some people heard of the Policy, mainly through radio or TV, but are unaware of the details and what the Policy covers¹⁵.

"People should come and inform us and describe what rights we have" (Host Community, Female)

"The government did not come here, how should we know that they have rules for the IDPs? (Host Community, Male)

"I have heard it from the Radio, but the government has done nothing and I don't know why the government is doing so." (IDP, Male)

"I watched it on the TV, how government is helping others but the government did not help us yet" (IDP, Female)

2. Assessment of the level of implementation of the IDP Policy

Even with a relatively good awareness among institution, this does not necessarily translate in the implementation of the Policy, and although government institutions are aware of the existence of the Policy, the limited understanding of their roles and responsibilities hampers its implementation, in particular at provincial level.

"Some departments know about the Policy but do not know exactly their roles and responsibilities. When you ask, you cannot get details but they know that there is an IDP Policy in the country" (UN)

"The Policy has all that the government should follow. I think it is about explaining to provincial authorities what they should and shouldn't do" (UN)

Among communities in Kabul province the implementation of IDP Policy is generally perceived as weak, with only a small amount of the allocated assistance reaching them. They show a general mistrust in the government, its capacities and integrity, as commitments are made but not fulfilled. It is felt that assistance does not benefit the displaced community as a whole, and some IDPs complain of having been excluded from aid distribution, which is based on reports provided by MoRR, because they did not accept to share the assistance or are not well connected with government officials. Officials are reportedly conspiring to misappropriate aid resources or asking for bribes before granting access to public utility services, such as public security, which should be free of charge. Complaints also come from host communities which report the same lack of access to government services.

¹⁴ Urban district within a municipal boundary

¹⁵ It should be noted that no awareness was carried out yet targeting IDPs, returnees and host communities in Kabul province as this is one of the activities planned by WHH to support the development of the Kabul Province PAP

"We refused to be involved with them in corruption, and then nobody pays attention to us. Proper reports were not given to the foreigners about our camp so they could not provide us full and equal assistance" (IDP, Male)

"The government has never supported the IDPs. A commander in Bagrami, when we asked him to assign two police officers to be present in the time of aid distribution - and this is good because if something happens the police is there - but the police commander said: Okay, I will assign my officers with you, but you will have to pay each one of them 2,000 AFA. I said, we do not have as much money to pay the police officers" (IDP, Male)

"The government has not been respecting our rights because they are not cooperating and they are even not coming to arrest the thieves. If they cannot solve our problems, and they are treating us like this, so, how will they treat the displaced?" (Host Community, Male)

"It has been six years that this people live here. The government neither resolves our problems nor their problems." (Host Community, Male)

"The government has rules and regulations but they are not doing anything practically, although the government has always been saying that will build schools for those people who do not have access to school, then why the government did not build a school for this village? In addition to this, we also do have problems with safe water, but they (government) did not do anything in this regard" (Host Community, Female)



According to some IDPs, NGOs do not deliver aid either. They report that NGOs promise but do not deliver and the situation in the settlements does not change. Better services are demanded not only by the IDPs or the returnees but more generally by the inhabitants of the area. There is a general frustration with IDPs assessing the international community as neglecting them, not monitoring aid distributions or not visiting the settlements to see the conditions in which people are living.

"NGOs are claiming that, due to low budget, they have reduced the amount of assistance to some camps, but as a matter of fact, this is because of corruption in the government. The foreigners only give assistance and do not visit the camps closely" (IDP Male)

The government reports having been able so far to provide mainly humanitarian assistance. Prevention and durable solutions have not been consistently implemented. The inability to prevent, or mitigate the effects of displacements and find solutions to ending it, results in an increase in the number of people who are still displaced.

"Currently we are only providing humanitarian assistance, the two main components prevention and durable solution are not working and the number of IDPs is increasing every year" (Government)

"We do not have contingency plans for emergency situations. For example when Kunduz collapsed there was no plan to deal with all the displaced families" (Government)

"IDPs do not want to go back to their places of origin and should be told repeatedly that they should go back" (Government)

Among the solutions, return seems to be favoured by the government, even to areas where security is still fragile and conditions for returns are not met. Although the principles in the Policy seem to be known they are not always respected and there are cases reported when IDPs were encouraged to go back despite a prevailing insecurity.

'We do understand that unfortunately in some places the security has deteriorated. And it will take years, before they could return to their places of origin. But the government is still insisting that they should return to their place of origin although all know about the principles of Policy¹⁶" (Government)

"When [the collapse of] Kunduz happened last year and then the city was again retaken [by the insurgents], the government was pushing hard for people to return, while the fighting in some parts of the city was still ongoing. The government wanted to show that it was providing assistance and protection to the displaced but they wanted them to go back and receive assistance upon return. The government was trying to push people to return. I think on one hand the position of the government is well understood trying to make people return to have less internal displacement on the other hand this is totally not in line with the principles of IDP Policy" (UN)

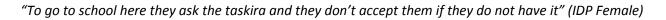
¹⁶ See National Policy on Internally Displaced Persons Durable solutions general principles p.49

Other examples of violations of the Policy principles are reported by IDPs interviewed in Kabul province. The national IDP Policy acknowledges that lack of documentation negatively impacts on displacement, preventing IDPs to access services such as education and health. In regard to education, the Policy provides children with the right to access primary and secondary schools, stating that "no IDP student will be denied access to a school on the grounds that they have no school records (children can be tested to find their appropriate grade) or no *taskira*" and then again "no IDP student will be denied access to the school because they cannot pay for a school uniform, school books, supplies or other similar expenses"¹⁷. However, it is reported that school directors do not always accept to enrol IDPs children if they do not have documentation. While the principles are accepted at the national level their execution in the field is not always happening.

"Even though IDP children should not need documentation to go to school, in practice they are turned away if they are without documentation (NGO)

"Last year when there was a high influx of IDPs, directors of schools didn't accept IDP children without documentation to be enrolled in the school" (UN)

"The ministry did not support my children to go to school, and I tried a lot to enrol my son in the school but I had no money to buy note books and pen for my son" (IDP, Female)





Other examples are provided by the IDPs who report difficult access to health care in government facilities.

¹⁷ National Policy on Internally Displaced Persons , p.45

"It is so tough for displaced people... they are asking us: Where are you from? If I tell them that I came here from this camp then they will not let us in, therefore I am always telling them that I came here from Arzan-Qemat or Kart-e-Now in Kabul" (IDP, Female)

"We have documents which says that displaced shall have free access to medical care but they (MoPH officials) are not aware of it, and it is a major challenge."¹⁸(Government)

"They are saying: Why are you coming here? Build a clinic for yourself in the camp!" (IDP, female)

Although for the IDPs settled in Kabul it should not be a problem to obtain a *taskira* as the application can be done in Kabul with central authorities, it still seems to be a problem due to the lack of knowledge of the procedures or the lack of cooperation by authorities.

"We can get the Tazkira in Kabul and when we go there they say you should go to your own district or province, but there is war and we can't go there. So, where we shall go and get the taskira? When we refer to Bagrami district they say your registration book is not here, if the book was here then we would have given you the taskira right now" (IDP, Female)

"I have a taskira but it was not easy to get it and you have to walk a lot here and there (IDP, Male)"

It could be more onerous and difficult for those IDPs displaced far from Kabul and in particular for those whose place of usual residence is still unsecure. The Policy states that "The Ministry of Interior will prioritize IDPs who do not have a *taskira* for receiving the *E-Taskira* and will authorize all central and provincial Department of Population Registration (DPR)¹⁹ to prioritize IDPs for issuance of the *E-Taskira*". While the distribution of E-Taskira is not progressing²⁰, there are pilot initiatives to support the government and facilitate IDPs in obtaining civil documentation, without being obliged to go back to their province²¹.

In regard to civil documentation which is a super lengthy process, in Herat right now there is a pilot project which is trying to implement in practice what is said in the Policy, so that IDPs don't need to return to their place or origin. When they collect enough requests for a particular district they go to the district so people do not need to travel" (UN)

C. Progress and limitations in providing durable solutions

¹⁸ "This Policy recognizes that IDPs are entitled to the same full access to basic health services as is enjoyed by other citizens and affirms that IDPs will not be denied access to medical facilities or services on the grounds that they do not have a tazkira", National Policy on Internally Displaced Persons, p. 43

¹⁹ Department of Population Registration (DPR) within the Ministry of Interior (MoI),

²⁰ National Policy on Internally Displaced Persons , p. 36. Currently, applications for Tazkera shall be done either in the place of origin, or with central authorities in Kabul.

²¹ https://www.nrc.no/news/2017/july/providing-legal-identity-to-displaced-afghans/

This section looks at how the Policy has supported the process of integration of IDPs and returnees and at the main challenges in doing so.

"At the provincial level, Herat has done the best of the three pilot provinces. In Balkh, the governor has not been fully engaged, and Nangarhar has been overwhelmed by emergency issues" (Government)

Solutions to displacement are an important component of the Policy and action plans shall focus on supporting durable solutions. Started in 2015 the development and implementation of the Provincial Actions Plans was piloted in three areas, Herat, Balkh and Nangarhar, with different results.

In Nangarhar the development of the plan was hampered by new displacements and high returns, therefore diverting the attention from durable solutions to relief assistance. In addition three different Governors were appointed since April 2014. The PAP was eventually drafted, but is not approved yet and discussions are ongoing on whether to merge it to the P-DiREC.

In Balkh, the plan was drafted a long time ago, but its approval is still pending, allegedly due to more pressing issues of political nature. In Herat the development of the action plan started in late 2015. There was resistance from some provincial authorities, particularly in regard to local integration, but the action plan was eventually endorsed by the governor and submitted to the High Migration Council. It is currently with the MoF for budgeting.

The development of the PAP for Kabul Province was launched on 11 October 2017 and is currently ongoing. MoRR is planning to develop plans also in Baghdis, Ghor and Farah provinces and eventually start the development of the National Action Plan. Discussions are however ongoing on a possible merging of the IDPs Action Plans with the DiREC Action Plans²²

The only PAP currently being implemented is the one of Herat. It is supported by international organizations and focuses on durable solutions. Local integration is reported to be ongoing successfully in particular in Maslakh settlement²³ where the development of a permanent water supply network, ended years of prohibition in the provision of long term services to displaced populations occupying public land. This initiative laid the foundation for a local integration process²⁴. This result has required investing time and resources not only on the provision of services and infrastructures but also in developing the government capacities to support durable solutions.

"It takes many agencies over the course of a couple of years to have [government officials properly] mentored and coached and to work with them and direct some of their activities to support this capacity, and that's what's happened in Herat" (NGO)

²³ Maslakh settlement is located in Injil district and is home to about 1,800 IDP households, majority of them being displaced by conflict for at least 10 years. Maslakh was closed by the government in 2005. UN Habitat, LIVE-UP Midterm Report

²² Consultant phone conversation with MoRR 5 November 2017

²⁴ Inter-Agency durable Solutions Initiative, Profile and Response Plan of Protracted IDP Settlements in Herat

Study on the National Policy on Internally Displaced Persons

While the government has traditionally supported return and reintegration as the main solution for the displaced, the continuing deterioration of security and worsening economic conditions, make clear that local integrations could be for many displaced the preferred solution. Local integration however continues to be poorly supported by the government as for many displaced it relies significantly on security of land tenure, a quite complicated and controversial issue. This is particularly true in Kabul where land ownership is often disputed.

"Lack of -clarity is still prevalent in the government as to whether people should go back to their place of origin or can be integrated in areas of displacement" (Government)

"There are lots of disputes over land; migrants have taken over lands allocated for clinics and schools" (Host Community, Male)

"We have a big problem with land grabbing. Most government land has been taken over and we need to provide IDPs with undisputed land" (Government)

There is a lot of resistance in regard to land, and disputes were reported in Bagrami, with host community accusing IDPs of occupying land and IDPs accusing local authorities of colluding with powerful people to evict the IDPs and grab the land where they have settled. Despite the disputes, however, the host community members know and understand the problems that the IDPs are facing.



"We have less problems. There is the problem of school and clinic for these people and we have a house but the IDPs don't" (Host Community, Male)

"The host community should get together and select a place for IDPs where we could all live together" (Host Community, Female)

A major problem is that host communities, IDPs and returnees alike are provided with a very poor level of government services. They all report poor governance and complain of overcrowded services in particular in regard to health, education and water. They all want more and long- term investments in infrastructure, public services and job creation. They all feel that the government is corrupted and not willing to listen and to help.

"Children are in school but the continuous influx of IDPs puts pressure on services. Medical services are bad. Both host communities and IDPs face the same problems with poor public services" (IDP Female)

"The children go and study their lessons and the children were going to school in one shift but now as the population increased so there are two shift now" (Returnee, Female)

"We do not want our children to be illiterate, but there is a lack of teachers. Especially there are very few female teachers. Let me tell you honestly this is a problem for both returnees and those who never left, because there is one school and all students are going to that school, but at school they are studying only for two hours, so what will they learn in two hours?" (Returnee, Male)

"This school does not have enough capacity and therefore they are not enrolling other students. Due to these problems our children are uneducated" (IDP Female)

Having a job is mentioned as a priority by IDPs as it can ensure self-sufficiency. Access to employment opportunities is mentioned as a challenge, linked mainly to the lack of network for people who have recently arrived. Livelihoods and skills cannot always be transferred and people are obliged to accept poorly paid, hard and dangerous works. To find a job, some decide to migrate abroad.

"But our situation compared to the first time has improved, for instance when I came to Kabul city, I was totally unfamiliar with this city, and I had never been to this city before. We had so many problems, we couldn't find work, and later on we managed to find daily labour" (IDP Male)

"If we could really work why we would be having these problems? Why our youths would have died in the seas trying to migrate to other countries? If the government was doing something for us, why would our youths get shot at by the Iranian and Pakistan police at the borders?" (IDP Male)

"I want to migrate to Iran', he had told his wife to stay here and he would go to Iran and send money from there but his wife told him: 'if you go then to whom you leave us here?' So they all moved toward Iran and on the way, Baloch people told them that the women would be transported in one truck and the men in another truck. But they didn't accept it and the Baloch people started beating them up and killed a few of the men. The widow women returned back to this camp, and when I saw their situation, believe me I became so sad and shouted but no one reached to help us" (Host Community, Female)

"We have the right to work here and the government should help us, we are not foreigners, we are from this country" (IDP, Male)

"There is no work, our sons work in the mountain and break the stones. It is dangerous and there are people who even broke their hand or leg doing that job. We were growing wheat at home, but not here and now we have to buy flour. (IDP, Female)

"My sons graduated from school now they are at home and don't have work. (Returnee, Female)

"Our men work but when it gets winter then there is no work" (Returnee, Female)

"The main problem is unemployment, neither there is work for men nor for women, my husband earns 300 AFA, so what should we buy with that money? (Returnee, Female)

D. Monitoring the IDP Policy

This section reviews the current state of monitoring of the Policy and identifies what are believed to be, by the stakeholders, the main points to be considered in the development of a monitoring system.

When asked about monitoring of the Policy most of the respondents highlighted the fact that no monitoring framework exists and that there are no mechanisms currently in place for a systematic and comprehensive monitoring.

The Policy foresees the creation of an oversight mechanism²⁵, to monitor and report on its implementation, and according to MoRR a monitoring cell was created after the Policy was endorsed. The initiative was however abandoned after six months as there were no inputs from the province. As of now the IDP Policy does not have a monitoring system in place.

Episodes of violation of the principles of the Policy are reported at the provincial level but not in a systematic way and there is no system to ensure government accountability nor to allow communities to file complaints and receive feedback. Provincial data are not compiled and there are no national data to show the scale of the violations. Monitoring and reporting violations should be a collective responsibility which shall involve all stakeholders, continue over time and escalate at the central level so that appropriate actions can be taken.

²⁵ National Policy on Internally Displaced Persons, p.54

The government, its international partners and IDPs, acknowledge the need to have a monitoring system with clear indicators to measure progress on implementation, identify shortcomings as well as non-respect of the principles. Monitoring should include the participation of the communities affected by displacement.

"A monitoring system should be developed to monitor the implementation of the Policy so that the shortcomings of every entity involved can be identified" (Government)

"We need clear indicators and a good system of monitoring" (Government)

"Monitoring should be government owned and its implementation must be a collective responsibility, with all actors on the ground reporting violations which should then addressed" (UN)

"There is no accountability and MORR does not have the ability to enforce the Policy, as issues go beyond MORR's remit," (NGO)

"The government should select few people to monitor and investigate where is this money going. Why the displaced are not assisted? (IDP male)

"We would like more monitoring of services with participation from IDPs "(Male IDPs)"

E. <u>The Policy in the current context</u>

This section provides a brief overview of the current context, the main shortcoming identified and what would need to be modified in the Policy to improve its operationalization.

The context in which the Policy was drafted and the current context are different: The number of people displaced has more than doubled²⁶, security is increasingly deteriorating reducing the possibility for many of the displaced to return home in the short term, the economic growth had decreased while the poverty rate has increased²⁷.

The Policy is considered good in its objective and principles. Its implementation modalities however do not always reflect the complexity of the Afghans context, nor take into account the capacity and resources of the institutions tasked to coordinate and implement it. It is believed to be too ambitious in terms of expectations of what can be really delivered and unrealistic on the timeline for the development of the plans.

"There were some problems with the implementation, but the principles are okay" (UN)

²⁶ In 2014 the number of IDPs was estimated at about 667,200 while in 2016 they were some 1,553,000 individuals. Source: International Displacement and Migration Centre (IDMC)

²⁷ GDP growth rate was 1.3. in 2014 and 0.8 in 2015 compared to an average of 9.8 between 2003 and 9.8. Poverty rate increased to 39 percent in 2013-14 compared to 36 percent in 2011-12. Ref. World Bank-UNHCR Fragility and Population Movement in Afghanistan

"Implementation modalities are ineffective. Too much focus on surveys and consultations and not enough on actual implementation" (Male IDP).

"It is difficult to implement the Policy, it is good in theory but divorced from the political context. The problem is that there is very little political will for implementation" (UN).

"Plans are extremely ambitious. There is no management from the government on the ground" (NGO)

"It is impossible in the current context of Afghanistan to pay the compensation to the people²⁸. Those countries who are paying compensations have the financial capacity to do it and currently we cannot are not even able to estimate properly the amount of the compensation." (Government)

The implementation of the Policy is in fact considered the main problem, without efficient and effective instruments, nor budget to make it operational. Uneven political commitment, limited coordination, poor planning and budgeting capacities, have hampered the implementation of the Policy. While MoRR's capacities to carry out a major role in coordination and implementation are a concern, in particular in the field, the lack of ownership and commitment by the other government institutions is considered to be hindering its implementation.

"No matter how good the Policy is, it will fail without collective responsibility throughout the government" (Government Official)

"All government institutions, not just MORR, should take responsibility for implementing this Policy" (Government)

The Policy is not realistic in regard to the capacities and constraints that the government has in fulfilling its responsibilities. The inability of developing proper budgets is reported as one of the main constraints in the operationalization of the Policy.

"The health department doesn't budget for the extra requirements that are needed for proper implementation of the Policy, education doesn't either. And so we have ended up with everyone staring at each other around a room who would like to help but it is not in the plans. If we were doing this properly, it should lead to on-budget financing with little bits added and supported, wherever appropriate, by NGOs or UN agencies or other stakeholders (NGO)

"The Policy is ambitious and the government does not have the capacity to deliver. This cannot be fixed with short-term training" (NGO)

According to the Policy, MoRR has the responsibility to "review the relevance of the Policy and the need for its adaptation or amendment" ²⁹. Majority of the respondents believe that the Policy needs to be reviewed and updated. Government capacities need to be strengthened at all levels to ensure its operationalization.

²⁸ See Right to Property Protection and Compensation, National Policy on Internally Displaced Persons, P.46

"The Policy should be reviewed and some clarity made on what are the real tasks of the government" (Government)

"The Policy should be modified and the mechanisms for its implementation clarified. Several surveys should be conducted to find out the effectiveness and the gaps, and the gaps shall be addressed, and the Policy should be implemented according to the actual context. We want this Policy to be more complete and stronger so that it could be more effective in its implementation." (Government)

"Many ministries can't plan or budget properly, and this cannot be solved with a two day workshop, they need years of mentoring and coaching" (NGO)

"Capacity of local authority should be built, in particular the governor's office, to be able to implement and monitor the Policy" (UN)

Since last year the DiREC has been supporting the implementation of the IDP Policy through the development of DiREC national and provincial plans. DiREC has also been looking, through its Support Groups, at issues of particular concern to IDPs, including solutions for lands and livelihoods. Some of the respondents believe that, although practical results have yet to be seen, DiREC has the potential to effectively provide substantial inputs to the implementation of the Policy, although there is a need to better understand its responsibilities and how it differs or relates to other coordination mechanisms.



²⁹National Policy on Internally Displaced Persons, p.51

SECTION 4 – CONCLUSIONS AND RECOMMENDATIONS

A. Awareness of the Policy

There is a general awareness of the Policy among most stakeholders, in particular those directly involved in its implementation. In the Government, awareness is stronger at the national level than at the sub-national level. It is also reported to be weaker among line ministries staff than among DoRR staff. The high turnover of government officials (linked to the 2014 elections) has delayed the awareness process, impacting on the implementation of the Policy. Although aware of the Policy, government officials do not always know, understand and implement its principles. Efforts to disseminate the Policy at national and subnational levels shall continue, with the objectives not only to enhance the awareness of the Policy but also to ensure its principles are known and understood, and that all stakeholders raise their commitment toward its implementation. Finally, the lack of comprehension of their role in implementing the Policy often prevents officials from taking initiatives.

Kabul city and Kabul province are particularly complex and highly politicized environments with many competing priorities. Ensuring that the Policy is understood and implemented at different level will require robust efforts and solid strategies. Awareness and capacity development at different level and among many stakeholders will need to accompany the development of the recently launched Kabul Provincial Action Plan.

- Disseminate the Policy and conduct awareness targeting government officials especially at provincial level. This shall be the responsibility of all government institutions involved in the implementation of the Policy. Focus shall be on civil servants who will be directly involved in the implementation of the Policy. In provincial capitals, key municipal departments and *nahia* staff as well as Municipal Advisory Boards should be targeted under this campaign. Finally, line ministries **should edit terms of reference of relevant staff at the national and provincial levels** to reflect their responsibilities in contributing to the implementation of the Policy.
- Design and implement an awareness strategy which targets communities affected by displacement. The strategy shall look at the use of different media, including social media as it is important that all parts of the society will be aware. The design of provincial awareness strategies shall be part of Provincial Action Plans. The plans should be budgeted, by each relevant line ministry. The implementation should be properly monitored to verify achievement of the desired outputs and outcomes.
- Awareness and information sharing shall focus on durable solutions. Communities affected by displacement need to be informed of the various options, strategies and prospects for durable solutions so that they can make an informed choice. Government officials shall have a better understanding of the Policy principles related to durable solutions and how they can support each of the solutions. IDPs and host communities shall be consulted when start planning for the implementation of durable solutions.

Instigate attitude change to unlock solutions. While there are actual factors that make the implementation of a solution difficult, such as issues related or land ownership or limited infrastructure and services or livelihood opportunities, there are also difficulties in accepting that return is not the only solution. Factors that block the government mind-set need to be identifies and unlocked. By organizing working groups to discuss, identify, understand and find solution to unlock the blocking factors; or by organizing site visits to places where the local integration process was relatively successful (for instance in Herat), with local officials presenting the advantages of formalizing an informal settlement for instance, could lead to a change in attitude and a solid commitment to the implementation of solutions.

B. Implementation of the Policy

In Kabul province, IDPs, returnees and community representatives, although generally aware of their rights as Afghan citizens, are not aware of norms specifically protecting the rights of the displaced. There is limited outreach by the government, services delivered are poor and insufficient to cover the needs of entire communities and there are complaints from IDPs related to their exclusions from aid distribution. The **implementation of the principles of the Policy is generally considered weak**. Communities do not trust the government, which is seen as corrupted and unable to fulfil the promises made and to deliver adequate services. Improvement promised do not materialize and people feel abandoned also by the international community, who rely on information provided by the government and does not visit communities nor monitor the delivery of the assistance. Also, communities demand **more investments in infrastructure and priority public services and assistance in becoming self-reliant through the provision of job opportunities.**

The Citizens' Charter provides an opportunity for IDPs to be represented in CDCs and be part of development decision making and implementation mechanisms. Informal settlement, whether in rural or urban areas, will be equipped with minimum standard services. As some of Kabul province districts, such as Bagrami will be targeted by the first phase, **collaboration with the Citizen's Charter** could create seamless opportunities for community awareness raising and provision of priority services.

For IDPs and returnees, access to services (health and education in particular) is prevented by the lack of civil documentation and financial means. Despite the provisions set in the Policy and although obtaining the *Tazkera* in Kabul is possible public officials are reported not always aware of the procedure or uncooperative.

The government recognizes having been able to provide mainly relief assistance, without being able to consistently implement prevention and durable solutions. There are **no plans for dealing with conflict induced displacement** and supporting **durable solutions has mainly focused on return and reintegration**. Due to the prevailing insecurity, return cannot be an option for many IDPs, at least in the immediate. The government needs therefore to find **adequate mechanisms and resources to support local integration** through access to land, services and livelihoods for displaced and receiving communities. Security of land tenure might be a complicated and controversial issue in particular in Kabul where land ownership is often disputed.

- Kabul Province PAP needs robust efforts in term of planning, budgeting and implementation. Due to the complexity of Kabul, city and province and the size of displacement, the PAP might need to be broken down into smaller area-specific plans to be designed in close collaboration with community representatives. A few locations which have a potential for success can be piloted, evaluated before being eventually rolled out. Appropriate visibility should be given to successful initiatives and lesson should be learned also from the least successful experiences. Affected communities need to be engaged since the very beginning and through extensive and frequent consultations.
- Assess how IDLG could provide additional support to displaced populations in provincial capitals/urban areas through its municipalities, at *Nahia* level in particular. Additional support by the Municipality could be provided to complement the work of the provincial DoRR, acting as focal point for collecting petitions, creating awareness or providing information. As Kabul Municipality does not fall under IDLG responsibility, these discussions need to be held directly with the Municipality.
- Ensure that proper and sufficient budget is developed to allow also for dissemination, awareness, coordination, capacity development as well as regular monitoring and evaluations. These activities are of foremost importance for preparing and improving the implementation of the policy but they are sometimes overlooked and not properly budgeted. Budgeting capacities might need to be strengthened where relevant.
- Prioritize area based projects that support the entire community and not only part of it and maximize local ownership. Activities such as water systems, education or health services and infrastructures shall be planned in consultation with all parties of the affected communities. As the Citizen's Charter provides opportunities to IDPs to be part of CDCs and therefore being engaged in local governance and community development, these new CDCs have a great potential to support the implementation of the Policy. Engaging with CDCs at field level, will maximise local ownership in identifying priority projects to provide host communities with resources to address the needs of the community as a whole. Government and partner shall engage on a regular basis with Citizens' Charter staff/Ministry or Rural Rehabilitation and Development (MRRD) at central and provincial level, through key meetings, and Citizen's Charter contributions to the development of the PAPs.
- Strengthen activities that support prevention and preparedness. The development of contingency plans for communities to deal with displacement; or the allocation of resources, such as block grants that can be rapidly deployed and allocated to communities when an influx of IDP occurs; or the development of projects that support the resilience of the part of the community that has not displaced yet, are all activities that can support prevention and preparedness. As in many situations the potential of displacements can be predicted, it is also critical to understand what are the reasons that induce some people to move and other to stay in order to design activities that could help in mitigating displacement.

Study on the National Policy on Internally Displaced Persons

- Develop a detailed understanding of the challenges and opportunities related to durable solutions. In order to design effective and sustainable interventions it is important to have a deep understanding of the challenges and opportunities. This includes considering the needs of the host community as their welfare is also critical for the process of integration of the displaced. Developing, collecting and sharing lesson learned and evaluations related to the implementation of durable solutions will help in understanding what has worked and why and therefore being able to replicate and adapt positive experiences to different contexts. The implementation of a comprehensive support to durable solutions requires strong coordination and collaboration among different actors (government, UN, NGOs and communities affected by displacement).
- Strengthen livelihood opportunities. Livelihood is a key component to ensure communities self-reliance and the sustainability of the integration/reintegration process. Livelihood programmes shall promote and preserve the use of skills and assets to enable the poorest individuals and households to move out of poverty. As reintegration involves individuals, households and communities that have changed as a result of their experience of being displaced, the design of livelihood activities shall consider not only current but also future conditions. For instance, those who lived in displacement for extended period of time might have become accustomed to urban life and their ability to work might be based on urban employment standards, which might not be suitable to a return to rural areas. Livelihood interventions shall be grounded on sound market assessments while capitalizing on individuals' strengths, skills and assets. Poverty graduation models can be explored, combining relief assistance with capacity building measures, to enable the poorest individuals and households to move out of poverty. The engagement of the private sector is key in creating economic opportunities in particular where there are large numbers of displaced/returnees.
- Develop government officials capacities in all steps of the implementation of the Policy. Conduct gap analysis and develop provincial capacity development plans that include in class and on the job training through coaching and mentoring. Make sure that capacity development activities target institutions at different levels but in particular targets civil servants who implement activities in the field. This can include providing Training of Trainers (ToT) and coaching to key government officials, DoRR in particular, so that they can create awareness/train colleagues, from the same or other institutions, on the Policy principles and implementation modalities. This activity can further enhance ownership of the Policy among key institutions at provincial level. A management and accountability system should be set up by the government at national level to held provincial government official accountable for the implementation of the Policy at field level.
- Enhance dialogue between government and communities affected by displacement. Both humanitarian and development partners can act as facilitators for dialogue between the government and communities affected by displacement. DoRR officials shall possibly be trained and coach on how to engage with communities and build their trust.

C. Monitoring of the Policy

The Policy currently does not have a monitoring framework and no mechanisms to carry it out in a systematic manner. A **monitoring system** with clear indicators is needed to ensure **government accountability** and to **measure progress on implementation,** identify shortcomings as well as non-respect of the principles. **Mechanisms to address grievances** are also needed to allow for the identification of problems related to the implementation of the Policy and for the identification of solutions.

- Develop a monitoring system, involving all stakeholders, which can be used by government and partners. The system shall identify proper mechanisms for monitoring performances of the government in the implementation of the principles and spell out clear reporting and feed-back mechanisms. Ensure that also communities affected by displacement contribute to the design and implementation the monitoring system. Consult with communities for the design of the Theory of Change and the development of indicators. Involving communities will be particularly important to understand what local integration or reintegration mean to people who are directly involved and how they could achieve sustainable integration.
- **Strengthen project monitoring.** This can be done also selecting and training community representatives to be part of joint monitoring teams including governments, IDPs/returnees and host community representatives and through the use of third party monitoring.
- Develop grievance mechanisms that will creates opportunities for the government and communities to identify problems and find solutions together. Accessible and transparent complaint mechanisms, shall be developed to allow all segments of the affected community to report on stakeholders' noncompliance of the Policy principles. The development and implementation of grievances management mechanisms will support the development and implementation of appropriate solutions and will enhance stakeholders engagement in developing strategies to address concerns raised through the grievance mechanism.
- **Review the DiREC monitoring system** with a view to identify opportunities for the monitoring of the Policy.

D. The way forward: Adjusting the Policy

Although the objectives and principles remains valid, the Policy does not seem to fully recognize the complexity of the context, actual resources and the capacities of MoRR and its partners. Expectations and timelines seem ambitious. In the last four years the context has changed and while the number of displaced has increased the resources of receiving communities remain limited. **A revision and an update of the Policy** needs to be carried out to identify implementation modalities which, taking into consideration the current challenges and limitations, would allow communities to enjoy their rights and find long term and sustainable solutions to their displacement.

The implementation of the Policy has been, so far, hampered by uneven political commitment and limited coordination, planning and budgeting capacities. While new instruments for the implementation of the Policy are being developed the government needs to reflect on which would be the best mechanisms to bring forward solutions for the displaced.

- **Review the Policy based on evaluations and lesson learned.** The implementation of the principles of the Policy, as well as the development and implementation of the PAPs, shall be appraised in different key geographical areas. A national workshop that brings together different provinces and stakeholders, and where challenges and best practices can be shared, could be organised to inform the revision of the Policy, its implementation modalities in particular. The review of the Policy shall consider the specificity of the different geographical context, the current and foreseen challenges and the capacities and resources of the government.
- Analyse the actual feasibility of the guidance for implementation of the Policy. Current guidance for addressing IDPs challenges shall be thoroughly analysed to understand their actual feasibility and enable the development of pragmatic alternatives. For example, a thorough review shall be carried out to understand whether the guidance to "allocate or design an IDP Trust Fund or an IDP National Budget" has been implemented, whether this implementation guidance is feasible or appropriate, and in case which could be the most pragmatic alternatives to ensure that funds could be easily available.
- Provide more clarity on the support and inputs that the DiREC gives to the implementation of the IDP Policy. While is clear that the DiREC contributes to the implementation of the IDP Policy, durable solutions in particular, the relation between the PAPs and the P-DiREC shall be clarified, in particular to avoid duplications.



ANNEX 1 – STUDY TERMS OF REFERENCE

Terms of Reference



For a world without hunger

Consultancy for Research project (study) on the IDP Policy

1. Background

Afghanistan has been in the state of a protracted humanitarian emergency with little prospect of recovery in the short to medium term. Thirty-five years of conflict and recurrent natural hazards have rendered the Afghan population very vulnerable, and many people 's coping mechanisms are exhausted. The fragile country is ranked in the bottom on almost all development indicators despite making significant strides since 2001. In addition to an internally displaced population of more than 1.2 million people, Afghanistan also has the largest population of refugees in the world, with many of them have returned/are returning from neighbouring Pakistan and Iran, either voluntarily or involuntarily. These returnees are then often displaced with Afghanistan upon their return. The Government of the Islamic Republic of Afghanistan (GoIRA) is stretched to provide relevant services and ensure access to basic rights to the displaced, thus relying on international and national humanitarian and development partners.

Most of the 1.2 million internally displaced persons (IDPs) in Afghanistan live in protracted displacement situation. IDP camps that were made for temporarily housing response are existing even more than 10 years after the beginning of the displacement. Despite of all the efforts of different organizations, advocating for a better future of IDPs, their persistent endeavour to reach the life they had before displacement remained unachievable. Most of the durable solutions have failed and IDPs remain disadvantaged and unable to fully enjoy their rights.

In response to the huge caseload of IDPs within Afghanistan and the challenges it brings to the affected displaced populations as well as the various areas hosting IDPs, the National Policy on Internally Displaced Persons (IDPs) was developed and then endorsed in November 2013 and launched by the Government of the Islamic Republic of Afghanistan (GoIRA) in February 2014. It is a national instrument designed to protect the rights of the displaced citizens of Afghanistan.

Although the IDP Policy has been well received, the implementation has been slow and complicated. Three pilot provinces (Nangarhar, Mazaar and Herat) were chosen in which an implementation plan was to be established. This has been achieved with mixed results, in varying degrees due to commitment by the authorities, capacity, complicated relationships between the various governmental departments and understanding of the IDP Policy.

With funding from the German government, Welthungerhilfe will conduct a comprehensive evaluation of the IDP Policy from an NGO perspective, to assess how the IDP Policy has helped (or not) to address the needs of IDPs at field level, and make their demands more visible. The evaluation will be multi-sectorial, and be conducted in a participatory manner, involving communities, NGOs working on the ground, UN agencies and government officials. Geographically, the evaluation will focus on Kabul Province. The aim of the study is to take stock of the implementation of the IDP Policy and to formulate recommendations for an improved implementation of the IDP Policy.

2. Welthungerhilfe in Afghanistan:

Welthungerhilfe was founded in 1962 as the National Committee of the Freedom from Hunger Campaign set up by the United Nations Food and Agricultural Organisation (FAO). Non-profit making, non-denominational and politically independent, the organisation is run by a board of honorary members under the patronage of the President of the Federal Republic of Germany. Today, it is one of the largest, nondenominational and non-political German NGOs in development co-operation and emergency relief.

Welthungerhilfe's overall objective in Afghanistan is to reduce the level of poverty while improving the livelihoods for the most vulnerable population. Welthungerhilfe's activities in Afghanistan began back in 1980 - immediately after the former Soviet Union's invasion - to provide emergency aid for refugees. Welthungerhilfe works in the areas of food and nutrition security, durable shelter provision, rural development and basic infrastructure, WASH, natural resource management and disaster risk reduction. Welthungerhilfe is present in the provinces of Kabul, Nangarhar, Jawzjan and Samangan.

In Kabul Province, Welthungerhilfe focuses on integration and reintegration support and protection for vulnerable and marginalised internally displaced people and Afghan returnees.

3. Objectives

- To assess how the IDP Policy has helped (or not) to address the needs of IDPs at field level, and make their demands more visible.
- To analyse the extent to which IDP Policy is relevant and applicable in Afghanistan context, and to recommend any adjustments which should be made to the policy by government.
- To conduct a comprehensive assessment of the effectiveness and impact of IDP Policy implementation in supporting the sustainable reintegration of IDPs in Afghanistan.
- To identify challenges and obstacles to IDP and returnee's integration and suggest potential solutions to these obstacles.
- To assess the role, effectiveness, and impact of existing instruments to facilitate the reintegration of IDPs and returnees.
- To provide clear recommendations on indicators, tools, and an effective system for the regular monitoring on the reintegration process.

4. Outputs

- A detailed report of all the assignments and outputs of the study in agreed template.
- A summary of the report, covering the main points.
- Presentation of main points of study in relevant clusters and working groups including, but not limited to, the Afghanistan Protection Cluster, Reintegration Working Group, Kabul Informal Settlements Task Force, and Humanitarian Response Team Meeting.
- Presentation of the study at a national conference in 2017.
- Electronic versions of the report in English, Pashto and Dari, to be made available on the web.

5. Methodology

As part of the assignment, the successful evaluator will apply a mixture of different methodologies, including primary data collection and review of existing resources:

- A desk review of all related documents (IDP Policy, Unified Action Plan, etc.)
- Interviews with all key stakeholders (IDP and returnees and their representatives, relevant government officials, NGOs, etc.)
- Focus group discussions with beneficiaries.
- KII with community representatives, relevant government officials and key staff.

As part of the assignment, the consultant will provide a detailed plan on proposed methodology. WHH will review the planned methodology presented by the consultant and provide feedback before the evaluation process begins.

6. Timeframe

The consultancy assignment should be conducted within the time span of a total of <u>three</u> consecutive months starting in August 2017. Details of the assignment schedule are to be provided by the consultant(s), taking into consideration the above-mentioned scope of consultancy activities, and after consultation with the relevant Welthungerhilfe focal points.

Any major obstacles or delays in delivery of the defined outputs should be immediately communicated to Welthungerhilfe. Any significant changes to the agreed-upon timetable should be communicated to Welthungerhilfe in advance.