

FINAL REPORT

INTER-AGENCY HUMANITARIAN EVALUATION OF THE RESPONSE TO THE CRISIS IN AFGHANISTAN

22 April 2024

Management, funding and implementation of the evaluation

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EXECUTIVE SUMMARY

1. This evaluation concerns the **collective humanitarian response to the crisis in Afghanistan since August 2021**. Specifically, it assesses the value of the coordinated response by members of the Inter-Agency Standing Committee (UN and non-governmental agencies and consortia) and their in-country partners to one of the world's largest humanitarian crises. The evaluation assesses the adequacy, relevance, and effectiveness of that response against an analysis of the humanitarian crisis, its nature and causes, and the ways in which millions of Afghans have experienced it.
2. In making this assessment, the evaluation considers how well humanitarian actors and the coordinated humanitarian system navigated the complex and challenging political and operational landscape from 2021 to mid-2023 and the period preceding the Taliban takeover. It considers what lessons can be learned from this experience and their implications for future practice in Afghanistan and beyond, when funding and operational space are becoming increasingly restricted.
3. Inter-Agency Humanitarian Evaluations (IAHEs) were introduced to strengthen system-wide learning and promote accountability towards affected people, national governments, donors, and the public. They are intended to help the humanitarian community improve aid effectiveness and contribute to humanitarian reforms. However, they are not an in-depth evaluation of any one sector or organization's performance. As such, they do not replace agency- or sector-specific evaluations.
4. Using a mix of methods, this evaluation draws on four main sources of evidence: a review of relevant documentation and literature; key informant interviews and roundtable discussions; a community consultation exercise in ten provinces across Afghanistan; and a field mission by the evaluation team involving multiple site visits. The overall guiding question for the evaluation has been how well the collective humanitarian response by IASC members served the short- and longer-term interests of vulnerable Afghans, particularly relating to acute threats to people's well-being and security. This is a function not just of the collective efforts of humanitarian agencies, Afghan and international, but also of international donors' willingness to support those efforts and of the *de facto* authorities' willingness to allow them.

The nature and causes of the crisis

5. The **humanitarian crisis in Afghanistan pre-dates the Taliban takeover in August 2021**. The extent of that crisis was only fully exposed with the cessation of the main hostilities, allowing access to previously inaccessible areas. A combination of drought, displacement, and COVID-19, together with the cumulative effects of armed conflict, chronic poverty, and development shortfalls, left much of the population in need of humanitarian assistance – but the prevailing conflict meant that a large proportion of those needs went unaddressed, particularly in less accessible communities.
6. The **causes of the post-August 2021 humanitarian crisis have been largely political and policy-related**. Political and economic isolation in the wake of the Taliban takeover led to the short-term collapse of the Afghan economy. Highly aid-dependent government services were severely affected by the suspension of development assistance. For ordinary Afghans, the results were disastrous. Many earlier development gains were reversed, and short-term risks escalated dramatically. While the rural economy has suffered acute stress, the crisis has created a **major new urban**

humanitarian caseload related to the loss of former employment. More generally, loss of livelihood options, lack of security of income, and near-universal food insecurity characterized this 'new' crisis for the majority of Afghans. Families struggled to feed themselves, to secure adequate shelter and clean water, and to access health care and education. Many are highly indebted and resorting to harmful coping practices. **Almost three-quarters of the population needed humanitarian assistance** during the evaluation period.

7. In parallel with the humanitarian crisis of access to basic goods and services, there has been a **crisis of human rights**, specifically related to Taliban decrees affecting the rights and freedoms of women and girls. The denial of female students' access to secondary and tertiary education, in particular, has significant humanitarian and developmental implications. From a humanitarian perspective, protection concerns constitute a major part of the agenda, particularly where they derive from DfA policies. They are some of the most difficult to address – including those related to the delivery of aid. Despite exemptions in some sectors and locations, the working bans on female Afghan aid staff have undermined both the delivery and quality of the humanitarian response. Differences over the proper collective response to these issues – both the bans and the rights issues – have been a source of tension and division within the Humanitarian Country Team and beyond. Those differences have played out at the international political level on the question of whether and how to engage with the Taliban authorities. This issue fuelled the **mutually antagonistic political positions** of the international community and Taliban authorities, leaving almost no space for constructive high-level engagement – in contrast to the often more productive local level engagement.
8. The humanitarian crisis in Afghanistan is a **protracted crisis** with multiple structural features and must be treated as such. While many aspects of the crisis pre-date August 2021, its escalation was caused by a series of policy decisions and the reactions to them – both by the DfA and international actors – which simultaneously exacerbated the crisis and restricted attempts to alleviate it. Even allowing for chronic and acute effects of climate change and natural hazards, **this has been a man-made, policy-related crisis**. It follows that its solutions depend on politics and policy change, as well as on an aid response that extends well beyond the core humanitarian agenda. With the reduction in funding for humanitarian assistance during 2023, the case for **allowing greater technical cooperation** with ministries and departments in life-critical services (including Health, WASH, and Nutrition) is compelling, as is the case for support to the related delivery systems at provincial and district levels. A comparable case can be made for additional support to the agricultural sector in cooperation with the Ministry of Agriculture.

Overall conclusions on the IASC response

9. Within the limits imposed by external factors (including funding and operational restrictions), the evaluation found the response by IASC agencies **largely fulfilled its primary humanitarian purpose**: it played a crucial role in protecting millions of vulnerable Afghans from many of the most severe threats they faced over the evaluation period. The response has also, as an important by-product, helped keep the Afghan economy afloat through the injection of cash over a critical period. Overall, **within its limits, the response effectively addressed the immediate needs of vulnerable Afghans**.
10. This conclusion must be qualified. Although it eventually scaled up to an impressive degree following the 2021 transition, the response only partially addressed the extraordinary scale and severity of needs. Benefits delivered have sometimes been overstated, and response gaps understated. Although relatively well funded through most of the evaluation period, that funding was quite narrowly focused and heavily conditioned – and was subsequently heavily cut back. Funding is

not the only issue: where the acute symptoms of crisis are the result of policy or structural factors (including many of the core Education and Protection issues), humanitarian approaches made relatively less impact. The overall conclusion remains: the ‘acute’ response was effective and essential to the short-term well-being of millions of Afghans.

11. The **medium and longer-term interests of Afghans have been much less well served**. The state-avoiding nature of the response and the policy and bureaucratic obstacles erected by the authorities severely limited the impact and sustainability of the aid efforts. The ‘bedrock’ problems of chronic poverty, underdevelopment, and social insecurity persist and are exacerbated by multiple compounding risk factors – including the extreme gender disparities resulting from the Taliban’s decrees. While over US\$6 billion was raised and spent through the internationally coordinated humanitarian system since August 2021, the actual costs of remedying the systemic and infrastructural deficits involved are far greater. This agenda lies well beyond the humanitarian system’s ability to deliver. The lack of linkage to any active development agenda is deeply problematic. Apart from the health sector, the ‘basic needs’ support agenda that was supposed to complement the humanitarian response materialized only in limited form over the evaluation period although it has since strengthened.
12. Overall, the response shows the **necessity of humanitarian action and the limits of what it can achieve alone**, particularly when heavily constrained by external factors. Within the limits imposed by external factors, the **performance of the humanitarian system was found to be relatively strong**, although the HCT was disunited at crucial points during the evaluation period over the bans and rights issues. The evaluation found that senior UN officials – including the Humanitarian Coordinator (HC) and deputy HC – provided strong leadership, along with key INGO directors. OCHA played a vital role, but sector leadership was variable.
13. Those responding to the crisis **struggled to reconcile the demands of the humanitarian and human rights agendas**. The result was confusion and sometimes a standstill when clarity and speed of decision-making were needed. Humanitarian aid has partly filled the vacuum of political and development engagement, but mutual mistrust, strict limits on aid engagement, and growing bureaucratic impediments made the **operating environment increasingly difficult to navigate** – something the ban on female Afghan aid staff exacerbated.
14. Regarding basic services, the **humanitarian system has been performing functions it was not designed to perform** in anything but the immediate short term (substituting for or maintaining basic state services), in the absence of substantive partnerships with government ministries. This parallel role provides no clear pathway to the recovery of state systems. Health is a primary example of this. Lack of investment in core systems and infrastructure means that basic services are increasingly fragile and limited in scope. Humanitarian support was stretched to breaking point in terms of resources over the evaluation period. The humanitarian response overall – while initially well-funded – saw a major decline in funding in 2023, though this was offset substantially by an increase in ‘basic needs’ funding.

Inadequate preparedness

15. Despite ongoing responses to drought, displacement and COVID-19, the humanitarian system was not well prepared to scale up for a crisis of the magnitude that unfolded after August 2021. The evaluation found a number of **measures could have been taken to anticipate and prepare for** the collapse of the government and takeover by the Taliban in August of that year. This includes planning for the potential impact of withdrawing development assistance on critical services and the likely

need to reconfigure and scale up the humanitarian response, which were plannable scenarios. Highly aid-dependent services like health are the clearest example of this. Planning was only part of the requirement. **Organizational and strategic flexibility** was crucial to enable the fundamental shift in the aid engagement model. This proved to be highly variable across the response.

Challenges in scaling up and shifting strategy

16. The period following 15 August 2021 and the establishment of an interim Taliban authority was characterized by a high degree of uncertainty and fear, particularly for the individual Afghans and civil society organizations associated with the humanitarian system or the deposed government. The evaluation found more should have been done to support them. The decision by UN operational agencies, the HC and OCHA, to ‘stay and deliver’ was brave and fully justified by the circumstances. They were well supported in this by the ERC and major donors. All agencies faced severe operational challenges including loss of air transport and restricted access to cash and did well to overcome them. The UN scheme for large-scale cash importation to the country played a crucial role.
17. The strategic shift required after August 2021 was achieved partially and gradually throughout the evaluation period. **It took too long to recognize how the nature of the crisis had changed** – and, therefore, how the response needed not just to expand existing operations but to evolve and shift the programme response in terms of targeting and content. It was not until the 2023 HRP that this shift was articulated more fully in collective plans, particularly with regard to the new urban and peri-urban caseload.
18. **Scale-up of the collective response** to the crisis was achieved more quickly in some sectors than in others, reflecting different levels of sector preparedness and organizational flexibility. Scale-up protocols played a significant part in enabling the transition, notably in filling personnel gaps. The speed and extent of scale-up in the food security and livelihoods sector was particularly impressive. However, there was some trade-off between coverage (scale/speed) and the quality of response. This was humanitarianism at its most basic, aimed at achieving high numbers quickly, geared towards short-term results – and implemented (at least in its earlier stages) with relatively limited detailed assessment, monitoring, or community engagement.
19. Major donors responded quickly and generously to the initial Flash Appeal in September 2021 and subsequent HRP for 2022. The response relied heavily on this initial investment and funds subsequently carried forward. Humanitarian funding tailed off sharply in 2023, and with no apparent prospect for the resumption of development funding, **future funding to meet Afghanistan’s basic needs remains highly uncertain.**

Variable coverage, effectiveness, and impact

20. The **coverage against needs of the scaled-up humanitarian response** to the new crisis by IASC agencies was proportionate to need in some sectors but not in others. For food security, the five-fold scale-up of food assistance after August 2021 allowed the response to match the ‘people in need’ figures up until 2023, when funding cuts caused a growing discrepancy between needs and response. The scale-up of agricultural support was unprecedented, funded by a combination of humanitarian and other resources. However, in sectors like WASH, Education and Shelter, the response has not been proportionate to needs, mainly because of limits on funding and policy restrictions. Overall, the scale of relief and recovery needs dwarfs even the relatively large humanitarian response.

21. With regard to **effectiveness and impact**, the response was similarly variable across sectors. In the key sectors of food security and livelihood assistance, the scaled-up response was largely effective in its primary purpose of mitigating the most acute threats Afghans have faced. The largest single sector of intervention – **food and livelihood assistance** – was found to have played an essential role in ensuring access to food, relieving pressure on household budgets, and (across the country as a whole) halting the extremely adverse trends in food insecurity. Agricultural support at scale was crucial, and the health response has played a limited but essential role in maintaining basic primary health services. Emergency Health and Nutrition support has been crucial to protecting the health and well-being of millions of adults and children. In other sectors – including Protection, Education, WASH and Shelter – the response made **relatively less impact** on the scale and nature of the problems involved, most of which are structural or policy-related. However, as the report documents, the role played in each of these sectors was crucial in relieving short-term threats to well-being and security, including through (inter alia) de-mining efforts, support to community schools, emergency WASH provision and concerted inter-agency ‘winterization’ programming.

Slow progress on accountability and community feedback

22. Most existing accountability mechanisms (upwards and downwards) are concerned with individual agency and programme performance. The Humanitarian Country team and the Inter-Cluster Coordination Team are the obvious forums through which to pursue collective and mutual accountability, but they fulfil that role to a limited extent only. Ultimately, aid agency accountability to intended beneficiaries must be understood in a broader framework of accountability and responsibilities encompassing the responsibilities of the *de facto* authorities and donor governments.
23. The humanitarian system **took too long to establish robust collective mechanisms** of Accountability to Affected People (AAP), which was not strong over the evaluation period. The AAP Strategy for 2023-24 represents a step forward, planning to integrate qualitative feedback from community consultations, including more female voices, and holds the potential to enhance the quality and effectiveness of the collective response.
- 24. Feedback from community consultations** undertaken for this evaluation raised two general issues. First is the importance of understanding the whole context for households and the compound nature of the risks they face, indicating the need for more multi-sectoral, area-based approaches. Second is the problem of trust, particularly concerns about perceived bias in the role of beneficiary selection by community representatives. Apart from transparency and two-way communication, this suggests the need for closer community consultation and more consistent monitoring by implementing agencies. Local NGOs play a crucial role in this.

Principles and engagement with the *de facto* authorities

25. On the question of principles, the evaluation concluded the humanitarian community had been right to invoke the humanitarian imperative. However, this was sometimes overstated and treated as applying almost by definition to everything done by humanitarian actors. In particular, claims that interventions necessary to save lives often lacked evidence. The threats to lives, health, and security are real, and so are the related imperatives to intervene. IASC members worked hard to defend the principle of needs-based response embodied in the principle of impartiality while often falling short for reasons beyond its control. Apart from re-affirming its Joint Operating Principles, the HCT could not reach a consensus on more specific operational ground rules and ‘red lines’ in late 2021. This reflected divisions between UN operational agencies and NGOs and was the cause of considerable acrimony in the HCT.

Conflicting views on engagement and response to Taliban edicts

26. Tensions between UN agencies and NGOs resurfaced concerning the **bans on female Afghan aid staff**, first for NGOs in December 2022 and then for the UN in April 2023. The evaluation finds the second (UN) ban should have been anticipated and better prepared for. The response to both bans should have been more concerted – allowing that agency mandates, sector-specific factors and different local contexts meant that some diversity of approach was inevitable. Further, the evaluation concludes **that a general suspension of aid in response to the bans would have been wrong in principle and probably ineffectual in practice**. However, it remains essential to engage with the *de facto* authorities on the irreplaceable role female staff play, particularly in reaching women and girls.
27. The broader question of **how to engage with the *de facto* authorities** has been a fraught one for humanitarian agencies. In the absence of any actual political process between the authorities and the international community, humanitarian aid agencies are expected to bear the burden of engagement. After an initial period with relatively few restrictions on internationally-funded aid, the DfA have increasingly exerted control over the aid agenda, imposing ever more onerous policy and bureaucratic requirements – including an increasingly time-consuming process for NGOs to secure MoUs. This has had a detrimental effect on delivering timely and effective aid across most sectors. The lack of effective channels for high-level dialogue with central authorities left NGOs managing this issue case by case. The impact on local NGOs has been particularly severe.
28. The **response by aid agencies to the bans on female Afghan staff has mainly been pragmatic**, using a combination of accommodation to the terms of the DfA edicts (such as insistence on accompaniment of female staff by a male relative *mahram*) and the negotiation of exemptions from the bans. The evaluation concludes that such approaches are generally justified by circumstances and by the aid imperative but a lack of harmonization of approach created problems of inconsistent standards being applied across different agencies, sectors and locations.

Navigating the operating environment

29. Overall, the **fragile and compromised** nature of the humanitarian response in Afghanistan – dependent on an uncertain patchwork of permissions, exemptions and locally negotiated access agreements – is one of its weaknesses. The increasingly restrictive operating space for humanitarian work has resulted in high levels of uncertainty over the continuity of aid provision. Even more concerning are attested instances of **aid diversion** or misuse, of which the cases in Ghor and Daikundi are the most serious examples. The suspension of aid in such cases is fully justified, but this seriously impacts the recipient populations, and the terms for the resumption of aid are uncertain. Humanitarian agencies and their donors need to be sufficiently confident they can satisfy humanitarian principles and that they can fulfil basic fiduciary responsibilities for the proper use of aid. The evaluation suggests **adequate processes are not yet in place** to justify such confidence, although it was unable to reach firm conclusions on this issue.

Recommendations

RECOMMENDATION 1: Ensure readiness Plans for high-risk countries		
Rationale	Recommendations	Resp.
<p>The Afghanistan experience in 2021 suggests the need for greater operational readiness in contexts of potential political or security transition. The response currently tends to be reactive and ad-hoc. This includes situations of potential regime change and/or descent into generalized armed conflict. Specifically, Afghanistan highlights the need to plan for the consequences of suspension or withdrawal of development cooperation and the role the humanitarian system may need to play in case of economic collapse, generalized insecurity, or potential system failure. Overall, the evaluation suggests there is a need for the IASC to take a more proactive approach to deteriorating situations.</p>	<p>1.1 Create a support framework in collaboration with development partners, at the global, regional and country levels for financing and implementing flexible readiness plans in countries at significant risk of fast-paced developmental failures and broad collapse of critical services.</p>	<p>IASC, EDG</p>
	<p>1.2 Systematically engage the bilateral and multilateral donors and IFIs to support readiness plans for high-risk countries.</p>	<p>IASC</p>

RECOMMENDATION 2: Resource And Harmonize The 'Basic Needs' Agenda		
Rationale	Recommendations	Resp.
<p>The evaluation concludes that Afghanistan's basic needs agenda (support to critical services) was under-resourced over the evaluation period and poorly harmonized with the humanitarian agenda. While reductions in humanitarian funding have been partly compensated by more recent increases in basic needs funding, there remains a disconnect between the two agendas. Humanitarian approaches have very limited sustainability, something of particular concern in an increasingly protracted crisis. Short-termism results in programme inefficiency, lack of local ownership, and an inability to address proximate risk factors, which results in needs being perpetuated. The global lessons concern adequate resourcing and harmonizing of support to critical services (basic needs) with a more short-term and reactive humanitarian agenda.</p>	<p>2.1 Continue to advocate with donors to ensure comprehensive planning and resourcing for a 'basic needs' agenda that complements the humanitarian response, recognizing the critical importance of sustainable support for essential services.</p>	<p>HCT, IASC</p>
	<p>2.2 Support for essential services, whether under a 'basic needs' rubric or otherwise, must be harmonized with the humanitarian response, ensuring the related roles and responsibilities of each are clear. Support for basic services should be planned on a multi-year basis as far as possible.</p>	<p>HCT</p>

RECOMMENDATION 3: Operationalize Humanitarian Principles and Protection Strategy

Rationale	Recommendations	Resp.
<p>While the Afghanistan situation is unique in many respects, the evaluation concludes that some more general lessons can be derived concerning the application of principles and the process by which this is collectively discussed and arbitrated. This includes the application of the humanitarian imperative, questions of programme suspension, and the relationship between the humanitarian and human rights agendas. Protection is generally perceived as a sectoral activity rather than as the collective responsibility of the entire system.</p> <p>The evaluation calls for clearer global guidance from the IASC concerning the above, and in Afghanistan, for clarity on the Protection strategy, application of the 'centrality of protection' principle, and stronger harmonization of approaches to policy edicts and access negotiation. When it comes to engagement, the evaluation suggests that lessons from the Afghanistan experience should contribute to a more global review of aid strategy in 'politically estranged' settings.</p>	<p>3.1 The IASC should agree on a more predic-table approach to operationalizing humanitarian principles within politically sensitive and complex environments, including criteria for when programme suspension is warranted and on interpreting the humanitarian imperative and the relationship between the humanitarian and human rights agendas.</p>	<p>IASC</p>
	<p>3.2 Establish an integrated protection strategy that clarifies the relationship between humanitarian and human rights agendas and the centrality of Protection, focusing on addressing policy edicts, including barriers to girls' education and restrictions on female aid workers. Promote stronger harmonization of approaches to policy edicts and access negotiation.</p>	<p>HCT, Protection Cluster</p>

RECOMMENDATION 4: Strengthen Accountability and Risk Management

Rationale	Recommendations	Resp.
<p>The evaluation found that Accountability to Affected Populations (AAP) had not been strong enough over the evaluation period and local ownership of and involvement in the response was limited. Feedback from community consultations suggested a lack of trust in the beneficiary selection process. Serious incidents of aid diversion in some Provinces highlighted problems of fiduciary risk management for aid providers in Afghanistan.</p>	<p>4.1 Establish a mechanism to monitor and review reported incidents of humanitarian aid diversion or other abuses and develop measures that might need collective action to reduce exposure to fiduciary risk.</p>	<p>HCT</p>
	<p>4.2 Establish a framework of collective performance indicators of the HCT to be reviewed and reported quarterly. This should include a combination of key programmatic progress indicators by Cluster together with crucial outcome indicators (e.g., food security, acute malnutrition levels, GBV levels) and process indicators (risk management, advocacy, etc.).</p>	<p>HCT</p>

RECOMMENDATION 5: Evolve Cash and Shelter Programs

Rationale	Recommendations	Resp.
<p>The evaluation findings suggest the need for robust multi-sector and area-based approaches to programming, including the expansion of the cash and voucher component of the FSAC response and a review of the potential for scaling up cross-sector use of multipurpose cash. The evaluation makes a case for a significantly scaled up and reconfigured WASH response and a greater investment in more sustainable shelter options (including transitional shelter). Both should be part-funded through a multi-year 'basic needs' stream.</p>	<p>5.1 Explore ways to expand the cash component of their responses to maximize programme efficiency and value transfer to beneficiaries. Harmonize this with the cash components of other sectors' responses.</p>	<p>FSAC, Cash Working Group</p>
	<p>5.2 Invest in more sustainable approaches to WASH and shelter responses. In the case of WASH, this will require advocacy with donors for a significantly scaled-up and reconfigured response, combining humanitarian and 'basic needs' (system-related) support. For Shelter, donors should establish a multi-year 'basic needs' funding stream to allow more sustained investment in transitional shelter.</p>	<p>Cluster Lead Agency, WASH and Shelter</p>

RECOMMENDATION 6: Improve Evidence, Outcome and Performance Indicators

Rationale	Recommendations	Resp.
<p>While the evidence base for the response strengthened considerably over the evaluation period, becoming more 'granular' and geographically specific, the evaluation found problems with how programme performance and outcomes are assessed and reported, reflecting more system-wide issues. Aid effects are too often assumed and too little is known about the role aid plays at household and community levels, or its wider impacts on markets and at population levels. The evaluation suggests that the 'diagnostic' component of the response must go beyond the standard needs assessment and monitoring approaches to answer deeper questions about relevance and impact. This may require new forms of impact analysis as well as the use of economic and behavioural research techniques.</p> <p>The evaluation makes several related findings concerning the use and interpretation of indicators, many of which are of system-wide relevance. These include the need for a clearer distinction between outputs and outcomes, the often-misleading use of indicators like 'reach' and 'target achievement', and the need to understand the consistency of benefit delivered over time.</p>	<p>6.1 Develop methods to gauge the delivery of aid benefits over time, including the consistency of aid delivery and its contribution to addressing vulnerabilities. This should include a harmonization of the use of 'reach' and coverage through shared metrics across clusters and an exploration of ways to focus on the outcomes of collective sector responses instead of aid delivered.</p>	<p>HPC Steering Group, GCCG, Cluster Lead Agencies</p>
	<p>6.2 Find better means of understanding the role actually played by aid within and between sectors, including exploring the use of alternative social and economic research techniques to understand the utility and impact of specific aid interventions at household level.</p>	<p>HPC Steering Group, GCCG, HCT, Afghanistan Clusters</p>

Abbreviations

AAP	Accountability to Affected Population/People
ACBAR	Agency Coordinating Body for Afghan Relief and Development
AITF	Afghanistan Infrastructure Trust Fund
ARTF	Afghanistan Reconstruction Trust Fund
AWD	Acute Watery Diarrhoea
BPHS	Basic Package of Health Services
BSFP	Blanket Supplementary Feeding Programme
CBE	Community-Based Education
CDC	Community Development Council
CERF	Central Emergency Response Fund
DACAAR	Danish Committee for Aid to Afghan Refugees
DfA	De Facto Authorities
DMAC	Directorate of Mine Action Coordination
DRC	Danish Refugee Council
EDG	Emergency Directors Group
EiE	Education in Emergencies
EMG	Evaluation Management Group
EO	Evaluation Office
EPHS	Essential Package of Health Services
ES-NFI	Emergency Shelter-Non-Food Item
ET	Evaluation Team
EU	European Union
FAO	Food and Agriculture Organization
FGD	Focus Group Discussion
FS&A	Food Security and Agriculture
FSAC	Food Security and Agriculture Cluster
FTS	Financial Tracking Service
GBV	Gender-Based Violence
GenCap	Gender Standby Capacity Project
GiHA	Gender in Humanitarian Action
GTS	Ground Truth Solutions

HCT	Humanitarian Country Team
HER	Health Emergency Response
HI	Handicap International
HLP	Housing, Land and Property
HNO	Humanitarian Needs Overview
HRP	Humanitarian Response Plan
IAHE	Inter-Agency Humanitarian Evaluation
IASC	Inter-Agency Standing Committee
ICCT	Inter-Cluster Coordination Team
ICRC	International Committee of the Red Cross
ICVA	International Council of Voluntary Agencies
IDP	Internally Displaced Person
IFRC	International Federation of the Red Cross and Red Crescent Societies
INGO	International Non-Governmental Organisation
INSO	International NGO Safety Organisation
IOM	International Organization for Migration
MoE	Ministry of Education
MoFA	Ministry of Foreign Affairs
MoPH	Ministry of Public Health
MOU	Memoranda of Understanding
MRRD	Ministry of Rural Rehabilitation and Development
MSF	Médecins Sans Frontières
MUAC	Mid-Upper Arm Circumference
NFI	Non-Food Item
NGO	Non-Governmental Organisation
NNGO	National Non-Governmental Organisation
NRC	Norwegian Refugee Council
OCHA	United Nations Office for the Coordination of Humanitarian Affairs
OECD-DAC	Organisation for Economic Co-operation-Development Assistance Committee
OHCHR	Office of the High Commissioner for Human Rights
PiN	People in Need
PLW	Pregnant and Lactating Women

PSEA	Protection from Sexual Exploitation and Abuse
SAM	Severe Acute Malnutrition
SCHR	Steering Committee for Humanitarian Response
SMART	Standardised Monitoring and Assessment of Relief and Transitions
ToR	Terms of Reference
UNAMA	United Nations Assistance Mission in Afghanistan
UN WOMEN	United Nations Entity for Gender Equality and the Empowerment of Women
UNAIDS	United Nations Programme on HIV/AIDS
UNDP	United Nations Development Programme
UNDSS	United Nations Department for Safety and Security
UNEG	United Nations Evaluation Group
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNMAS	United Nations Mine Action Service
UNOCA	United Nations Operations Centre in Afghanistan
US	United States
USD	United States Dollar
WAG	Women's Advisory Group
WASH	Water, Sanitation and Hygiene
WB	World Bank
WFP	World Food Programme
WHO	World Health Organization
WoAA	Whole of Afghanistan Assessment (REACH)

Note: The phrase 'UN agencies' is used in the report text as a shorthand to denote the UN Agencies, Funds and Programmes engaged in the humanitarian response.

Figure 1: Administrative map of Afghanistan showing Provinces

Source: <https://www.un.org/geospatial/content/afghanistan>



Map No. 3958 Rev. 7 UNITED NATIONS
June 2011

Department of Field Support
Cartographic Section

Figure 2: Map showing 2023 distribution of 'People in Need'

Source: <https://www.un.org/geospatial/content/afghanistan>

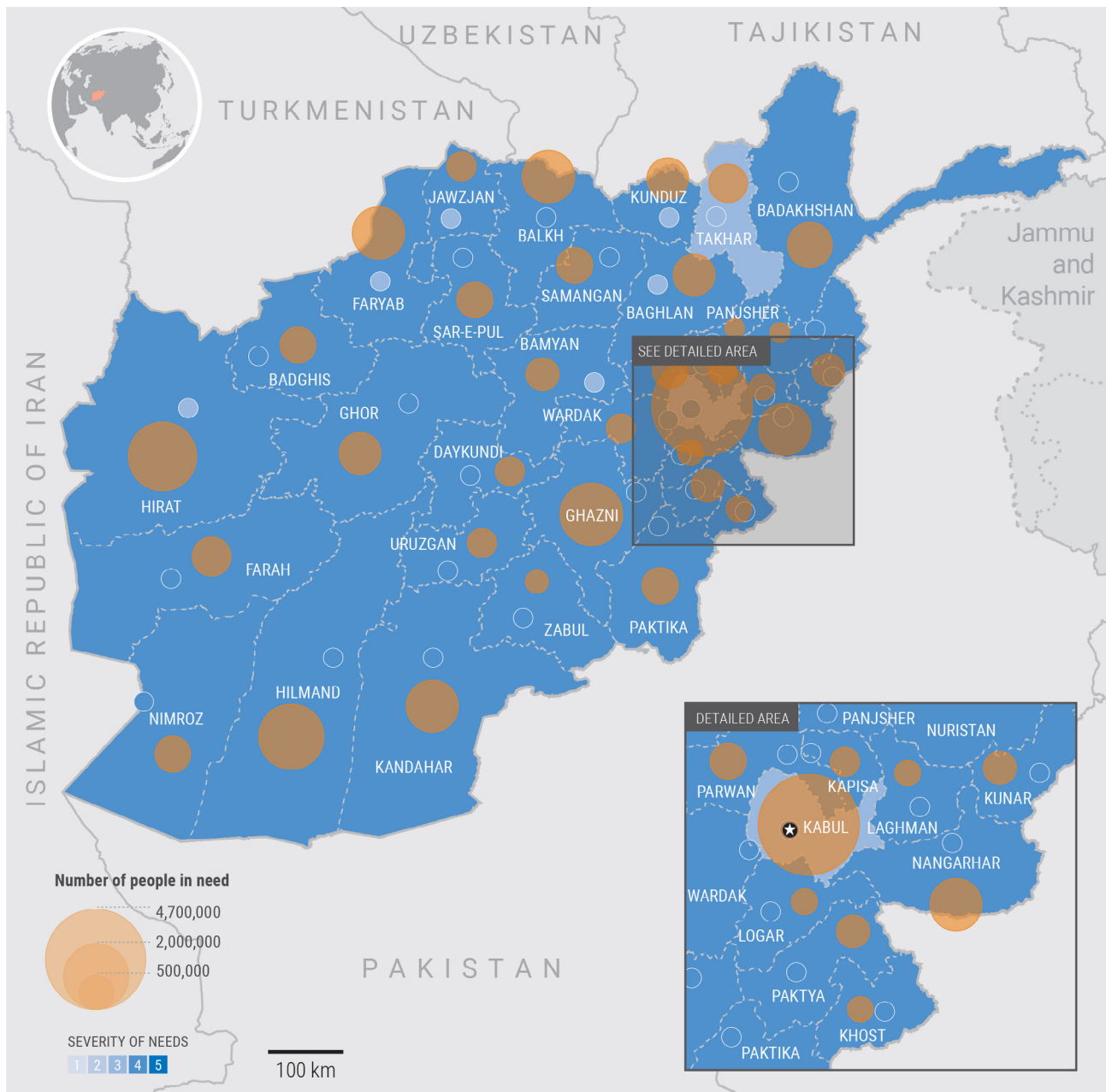
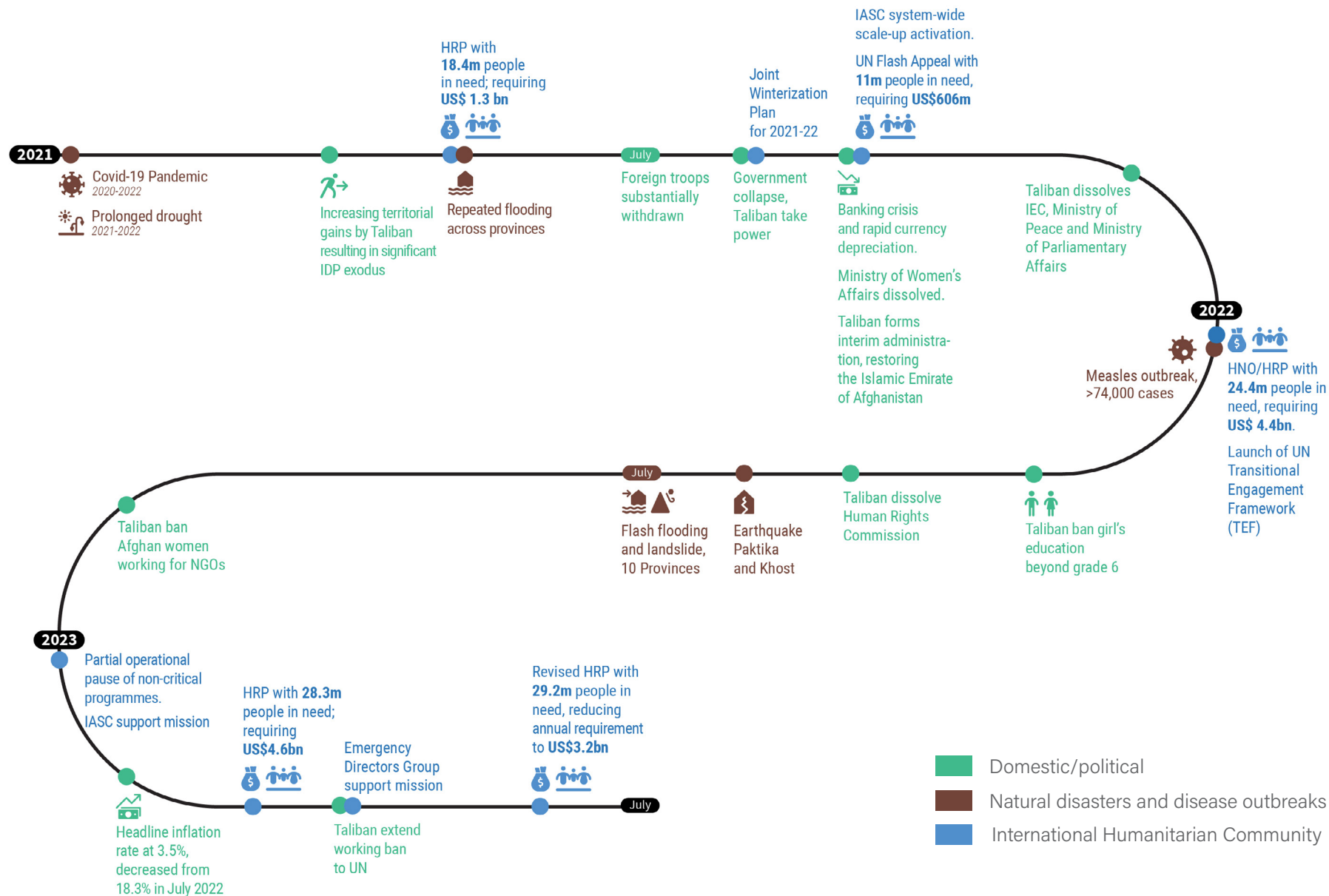


Figure 3. Selective political and humanitarian timeline for Afghanistan



SECTION 1: INTRODUCTION AND OVERVIEW

30. One of the abiding images of the crisis in Afghanistan is that of the chaos in Kabul in mid-August 2021, particularly the- desperate scenes at the airport as the Taliban took control of the city and the international forces hurriedly departed along with civilian administrators, many UN and NGO international staff, and some of the Afghans connected with the fallen government or foreign forces. Those associated with the Republic were afraid of retribution, and the supporters of the previous government saw the near-total collapse of their state-building, security and developmental efforts. Most Afghans had no ties to the government or foreign forces or to the related political and developmental agendas. For them, this was a period of extreme uncertainty and fear for the future and this remains the case today, particularly for the women and girls of Afghanistan.
31. This evaluation is about the less visible but more damaging aftermath of those events in 2021. It concerns the humanitarian crisis that escalated in the wake of that transition and the collective response to that crisis by the international humanitarian system and its partners in the country. It takes an 'outside-in' approach to assessing the value of that response. In other words, it seeks to base judgments about the relevance and effectiveness of the response on an understanding of how vulnerable Afghans experienced the crisis in reality. Meeting delivery targets is one thing; providing substantive, life-sustaining benefits to people in a form that meets their needs is another. As part of the evaluation, a community consultation process was undertaken. More generally, in dialogue with responders, the evaluation tried to comprehend the 'real world' challenges of assessing and helping meet the most acute needs of vulnerable people on such a vast scale, given limited resources, restrictive policy frameworks and often highly adverse operating conditions. Though the evaluation involves a critique of that collective endeavour, it should also be read as a testament to the hard work and sacrifice of those involved.

Purpose and scope of the evaluation

32. The subject of this Inter-Agency Humanitarian Evaluation (IAHE)¹ is the response by IASC members² to the humanitarian crisis in Afghanistan since August 2021. As set out in the Terms of Reference (ToR), the IAHE is intended to fulfill two purposes: (i) *'To enable learning for the humanitarian system'*, and (ii) *'To ensure accountability of the IASC organizations towards both affected populations and donors'*. The main objective was to provide *'an independent assessment of the collective action of IASC member organizations to meet the humanitarian needs of people affected by the humanitarian crisis in Afghanistan'*. Specifically, this includes assessing the relevance, coherence, and effectiveness of collective preparedness and response efforts, including the gender dimensions of the response; assessing the results and outcomes from that response; and identifying *'good practices, opportunities and lessons learned'*.³

1. The IAHE was commissioned through UN OCHA by the IAHE Steering Group on behalf of the Emergency Relief Coordinator (ERC). The conduct of an IAHE is a requirement of the Humanitarian System-Wide Scale Up Protocols activated in September 2021 by the global Inter-Agency Standing Committee (IASC); and it involves commissioning of an independent assessment of the results of the collective IASC response.

2. The IASC is chaired by the Emergency Relief Coordinator. The full member organisations are FAO, IOM, OCHA, OHCHR, UNDP, UNFPA, UNHABITAT, UNHCR, UN Women, WFP and WHO. Standing invitees include the NGO consortia SCHR, ICVA and InterAction; as well the ICRC and IFRC, Save the Children International, and the Special Rapporteur on the HRs of IDPs.

3. The original objectives include providing learning on the relevance and effectiveness of the Scale-Up Activation for the response in Afghanistan. This is now the subject of a more specific, separately commissioned review by UN OCHA that considers the application and utility of the Scale-Up Activation in Afghanistan and Northern Ethiopia.

33. Given the way in which the evaluation was conducted in practice, it is important to qualify the above. With regard to learning, the evaluation takes this to apply to the response in Afghanistan, and the approach of the evaluators centered on encouraging reflection by current aid practitioners, their organizations, and coordination bodies, including the HCT. Many of the evaluation's findings are based on conversations with these practitioners, individually and in groups, some of which will resonate beyond Afghanistan.

34. The evaluation provides an analytical account of the collective response as a basis for holding responders collectively accountable⁴ to key stakeholders.⁵ Over US\$6 billion was allocated and spent on the response over the evaluation period. In broad terms, the evaluation addresses the questions of how well that money was spent and whether it achieved its intended purposes. In this context, it should be noted that the evaluation deals with collective responses and aggregate results by sector and overall rather than individual programmes. It is not intended as a substitute for individual agency or programme evaluations.

35. Inter-Agency Humanitarian Evaluations (IAHEs) were introduced to strengthen system-wide learning and promote accountability towards affected people, national governments and donors. They provide an independent assessment of results of the collective humanitarian response by member organizations of the IASC. Part of their purpose is to inform humanitarian reforms and help the humanitarian community to improve aid effectiveness to assist affected people better. They are not an in-depth evaluation of any one sector or of the performance of a specific organization.

Temporal scope

36. The main subject of the evaluation is the collective response since August 2021, but this involves some consideration of the preceding period to establish some baselines, consider the issue of preparedness, and (crucially) understand the origins and causes of the crisis. The evaluation considers three main stages of the crisis response:

- (i) the lead-up to the events of August 2021;
- (ii) the political and aid transition that followed 15 August that year and scaling up of the response to address the emergent humanitarian crisis in the winter of 2021/22; and
- (iii) the response through 2022 up to summer 2023.

37. In addition to these three stages, the evaluation considers the future humanitarian outlook in reviewing lessons learned and making recommendations.

Substantive scope

38. The response by IASC members to the humanitarian crisis since August 2021 is the core subject of evaluation. This must be understood in a broader historical, political, and socio-economic context—specifically, the situation of the country in the period leading up to the political transition of 2021⁶ – and explored

4. Collective or joint accountability, and the means of achieving it, is notoriously difficult to define. The subject of accountability, including agency accountability to affected populations (AAP), is discussed later in this report. The related subject of mutual accountability within the aid system (e.g., between members of the HCT) is also considered.

5. The primary stakeholders are the intended beneficiaries of the response, and the main funders of the response (donors).

6. Beyond the period leading up to August 2021, the relevant context includes the political and aid history dating back twenty-five years to the period when the Taliban were last in power, and it extends even further back in time. A brief analysis of the relevant history and its enduring effects is given in Section 2.

in the analysis of the nature of the crisis in Section 2 below. The response is primarily considered in terms of coverage and reach, strategy and relevance, effectiveness and impacts. The functioning of the humanitarian aid system in Afghanistan, including the HCT and Clusters, is reviewed in the light of this analysis. Specific attention is devoted to the process of transition and scale-up in 2021, as well as to questions of principle and engagement with the DfA, notably around the bans on female Afghan aid workers. The ways the UN and NGOs addressed the multiple challenges, dilemmas and compromises of working in present-day Afghanistan are assessed with the aim of identifying lessons for the future.

39. While the subject matter of the evaluation is the collective response by IASC agencies, it also involves consideration of the roles of others in humanitarian terms. These include crucially the DfA and donor governments, whose respective policy decisions shaped both the crisis and the humanitarian space within which the response has been mounted. The essential role of civil society organizations in Afghanistan, including women-led organizations, and how this is impacted by the crisis, is considered in the context of their partnerships with international agencies. This subject deserves more in-depth attention than is possible in this evaluation. So, too, does the assistance and protection response to human displacement, informal settlements (largely peri-urban), and the return and reintegration of refugees and internally displaced people in their home areas. This is covered here relative to the general response post-August 2021 and is covered more fully in other evaluations and studies.⁷
40. The humanitarian system-related issues noted above have to be assessed in relation to the primary subject of the evaluation: the value of the coordinated response in light of the needs of vulnerable people in Afghanistan and the enormous scale of the challenges they face. Did the multiple-component responses come together effectively to address those needs? The ultimate test of this lies in the domain of changed outcomes for vulnerable populations, and this poses one of the main evaluability challenges: to assess what change occurred against predicted outcomes, and to what extent this can be attributed to aid interventions. Many of the outcomes in question have been framed in terms of 'life-saving' or reduction of mortality and morbidity, yet projections against these criteria are highly uncertain, and data against which to judge impact at this level are scarce.
41. The more general test of value is one of benefits provided to vulnerable households in combatting the acute daily challenges they face: securing income, obtaining food, fuel and clean water, getting access to health care, getting children into school, and keeping them safe, and so on. Here the questions relate more to coverage and reach of aid; the relevance, quality and effectiveness of assistance and services provided, and the role in people's lives. Assessing this depends partly on the quality of evidence from assessment, monitoring and feedback mechanisms. These questions are central to the evaluation and are considered further – together with effectiveness – in the following sections.
42. One thing that links the concern with outcomes and benefit delivered is the question of vulnerability reduction through mitigation of known risk factors for specific critical outcomes. Given the scarcity of reliable outcome data,⁸ judgments about effectiveness and impact made in the evaluation are primarily based on a combination of (i) programme logic and rationale including targeting in relation to assessed vulnerabilities, (ii) effective delivery of outputs, (iii) the likely reduction of known risk factors to vulnerable groups, (iv) general benefit delivered to households. The related evidence and the strength of the conclusions varies by sector and target group.

7. See in particular the Evaluation of UNHCR's Response to the Level 3 Emergency in Afghanistan 2021-22: <https://www.unhcr.org/sites/default/files/2023-07/evaluation-report-l3-emergency-afghanistan-june-2023.pdf>

8. We refer here to data collected by IASC agencies and Clusters concerning the outcome of their interventions. In a more general sense, 'outcome' data reflecting changes in external variables over time are available to some extent through assessment exercises conducted by REACH, Ground Truth Solutions and others. Attempts to establish correlations and potential causal relationships between these data sets and programme data are valuable but challenging, and they have been conducted only to a limited extent. They lie beyond the capacity of an inter-agency, multi sector evaluation to attempt, although some reference is made to apparent correlations between contextual and programme data where this appears significant.

Framework of evaluation questions and issues

43. The evaluation is framed in general terms around the following overarching questions: *How well has the collective IASC response in Afghanistan since August 2021 served the best interests (short and longer-term) of vulnerable people across the whole of Afghanistan? Specifically, to what extent has it enabled them to avoid, withstand and recover from acute threats to their well-being and security? How well has it addressed the particular needs of the most vulnerable groups?*
44. A matrix of specific evaluation questions formed the framework for the more detailed inquiry (see Annex E). These centre on the causes of the crisis and operational context; the scale and coverage of the response, its relevance and rationale; the delivery of the response and its effectiveness; issues of system coherence and coordination; and a range of cross-cutting issues, including issues of principle, gender and human rights; and questions of sustainability and connectedness.
45. In addition to the evaluation questions, particular topics of strategic interest were identified in advance of the field work in Afghanistan, as follows:
- **Preparedness and transition.** Could more have been done pre-August 2021 to prepare for the crisis that followed the collapse of the Republic? How well was the transition managed?
 - **Programme scale-up** post-August 2021. How effectively was the scale-up of the humanitarian response managed and resourced in practice?
 - **Engagement strategy and response to Taliban edicts.** How appropriate and effective was the engagement by IASC members with the DfA over the evaluation period?
 - **Humanitarian and human rights principles and approaches.** How were the demands of humanitarian and human rights principles understood and applied in practice?
 - **Prioritization, resource constraints and aid conditionality.** How well were the effects of funding and other resource constraints on the response managed?
 - **Humanitarian assistance, sustainability, and the 'nexus' with development.** Since the suspension of most development funding in August 2021, to what extent has the humanitarian response taken on functions previously covered by developmental interventions?
46. These topics are considered in the remainder of the report, alongside the core evaluation questions, and multiple further topics subsequently identified during evidence gathering.

Approach and methods⁹

47. To address these questions, the evaluation adopted a consultative and participatory approach, looking to identify lessons and ways forward in collaboration with those involved in the response while maintaining an independence of judgment that the accountability aspect of the evaluation demands. With regard to system performance, the focus is on collective mechanisms (HCT, ICCT, Clusters, etc.) rather than on the performance of individuals or specific agencies.
48. A mixed-methods approach was adopted to allow data to be triangulated as far as possible through both qualitative and quantitative analysis. Four primary methods of evidence gathering were used:
- 49. Document and literature review** – The evaluation draws on both primary and secondary sources. Primary sources included humanitarian response plans, HCT, agency and Cluster documentation (including reports, meeting minutes, and strategies), and IASC-specific documentation. Secondary sources included publicly available literature, including academic and 'grey' literature, such as relevant reviews and articles. Some non-public sources were consulted.

9. A fuller account of the methodology, including the community consultation process, can be found in Annex F.

50. Key informant interviews and roundtable discussions. These included senior leaders from the HCT, staff from UN agencies, Cluster coordinators, representatives from INGOs, national and local NGOs, donor representatives, academics, and independent informants. They also included several senior DfA officials at the provincial level. The evaluators conducted 137 key informant interviews, of which 115 were in-country and face-to-face. These were in addition to interviews conducted during the community consultation process below. Three roundtable discussions were held (in Kabul, Herat and Mazar) during the IAHE field mission to Afghanistan in late May/early June 2023, which included approximately 87 participants in total.¹⁰
- 51. Community consultation** with members of affected communities. Twenty-one districts were selected for this consultation exercise, to obtain a diversity of views across different contexts within the ten provinces of Northern, Southern, Eastern, Western and Central regions of Afghanistan. Undertaken with a partner organization in Kabul, this involved 24 focus group discussions and 62 key informant interviews. 192 people were consulted, of whom 43 or 22 per cent were women.¹¹ While not intended to generate statistically meaningful results, the consultation provided a window into people's situations, their coping mechanisms, and their experiences of aid.
- 52. Country visit/direct observation.** The evaluation team visited Afghanistan from 21 May to 8 June 2023. Besides consultations and interviews held in Kabul, Herat and Mazar-i-Sharif (see above), the team made several site visits in urban, peri-urban, and rural locations. These included health and nutrition centres, water supply facilities, schools, business centres and farms. Direct observation was supplemented with multiple consultations at each site that are not included in the above statistics.
53. Some limiting factors constrained the evaluation beyond the inevitable limits of time and resources. One is the availability of informants – many of those present during the transition of 2021 moved on from their posts, and while some of these were consulted, others were not available. Another limit was on the extent to which consultation was possible with officials in the *de facto* authorities. While some discussion was possible, for example, with Directorates at provincial level, no discussion was possible with central authorities in Kabul or Kandahar. The fieldwork for the evaluation was conducted in May/June 2023, since when the situation has evolved – though its main features persist. A more general limitation was the availability of reliable data. While there is no shortage of documentation and analysis – Afghanistan is one of the most analyzed contexts in the world – critical data gaps remain, particularly relating to health and education outcomes, household economies and the impacts of aid. These are discussed further in the following sections.

Report structure

54. The following sections begin in Section 2 with an analysis of the nature of the crisis (its symptoms and causes) and the implications of this for the response. The situation before August 2021 is considered in Section 3 relating to pre-existing causal factors and the question of preparedness, followed by a review of the subsequent transition and scale-up after August 2021. Section 4 reviews the coverage, relevance, quality and effectiveness of the sector-specific response over the evaluation period. Section 5 considers some specific aspects of the performance of the humanitarian system, including questions of accountability, feedback and management of aid risks. Section 6 looks at issues related to politics, principles and engagement with the *de facto* authorities, with particular reference to the bans on female Afghan aid staff and how the system responded. Finally, in Section 7, the report draws overall conclusions and lessons, and makes a series of related recommendations.

10. Some participated online but wished to remain anonymous. Given the scale of in-country consultation, it was decided not to conduct an online staff survey in addition, as had been proposed as an option in the Inception Report for the IAHE.

11. Although the consultation attempted to maximise the participation of women, concern for the safety of participants meant that in practice, less than one quarter of informants were female.

SECTION 2:

THE NATURE AND CAUSES OF THE HUMANITARIAN CRISIS

55. The Humanitarian Response Plans (HRPs) for the years 2022 and 2023 presented a compelling picture of the extent and severity of the threats facing ordinary Afghans. An estimated 22.4 million Afghans were assessed as being 'People in Need' (PiN) requiring humanitarian assistance in 2022, a figure that surged to 29.2 million in 2023 – or around three-quarters of Afghanistan's entire population.¹² But while most Afghans were assessed as vulnerable over the evaluation period and in need of assistance, these top-line figures mask a great deal of complexity and variation, and they do not say anything about the nature and causes of the threats people face.
56. So, how should the humanitarian crisis in Afghanistan be understood? Answering this question is the first step in evaluating the collective response. In this section, we review the main causes and symptoms of the crisis to characterize the situation more precisely and to distinguish its various component parts. This then informs the analysis of the different elements of the humanitarian response in the following sections of the report.

The causes of the crisis

57. The current crisis in Afghanistan cannot be understood solely in humanitarian terms: the humanitarian situation is the most acute aspect of multiple intersecting 'crises' that bear on Afghans' lives and future prospects. The outline causal analysis presented here suggests the need to understand the underlying and structural causes of the humanitarian crisis – including political, demographic, socio-economic and developmental factors – as well as more immediate causes of vulnerability and threats to people's well-being and security. There is a temporal dimension to this: some of the vulnerability factors pre-date August 2021, while others date to the immediate aftermath of the Taliban takeover. Some have evolved in the two years since the takeover. As the crisis becomes protracted, most such factors seem likely to continue for the foreseeable future.

Historical roots of crisis

58. Any adequate explanation of the current humanitarian crisis in Afghanistan has to consider its historical roots and the impact of the more recent period of history leading up to August 2021. Over the decades since the 1970s, Afghanistan has almost continuously been subjected to armed conflict, predatory warlordism, and violent insecurity. This has left a toxic and divisive political and social legacy as well as taking a massive human toll, including tens of thousands of civilian deaths in the past two decades;¹³ mass displacement of people (internally and externally);¹⁴ and high levels of

12. As reported in mid-year revision of the 2023 Humanitarian Response Plan (Revised HRP June 2023 – UN OCHA)

13. Estimates of civilian deaths vary, partly depending on time period considered. The US Institute for Peace estimates at least 46,000 civilian deaths during the US war with the Taliban, acknowledging this is likely to be significantly underestimated: *In Afghanistan was a loss better than peace*, K. Bateman, USIP, 2022. <https://www.usip.org/publications/2022/11/afghanistan-was-loss-better-peace>. Overall deaths including combatants run to hundreds of thousands over the past three decades, estimated at least 176,000 since 2001 (Costs of War, Watson Institute of International & Public Affairs, Brown University, 2021.)

14. Since 2001, some 5.9 million Afghans are reported to have been displaced, either as refugees or IDPs. Source: Brown University Costs of War project - <https://watson.brown.edu/costsofwar/costs/human/refugees/afghan>. This does not account for the millions exiled (largely in Pakistan and Iran) during previous periods of conflict.

dangerous remnants of war (landmines and unexploded ordnance).¹⁵ The related political history is documented extensively elsewhere.¹⁶ The most recent period of conflict, dating from the post 9/11 invasion by US forces in 2001, saw Western- (mainly US-) backed governments of Hamid Kharzai and Ashraf Ghani supported by high levels of investment in security and development, fighting a Taliban insurgency of increasing intensity.

59. While this period witnessed significant development gains, the extent and durability of these gains is uncertain. Advances were made in areas like maternal health,¹⁷ female literacy and school enrolment¹⁸, along with progress in infrastructure development. However, the achievements of the past two decades – many of which have been reversed – must be set against the broader legacy of poverty and insecurity. Poverty and lack of development are the bedrock problems, and significant rural/urban divides remain in terms of levels of development and access to services.¹⁹ This has left Afghans, particularly rural farming communities, ever more vulnerable to the climatic shocks (drought, floods) that have hit the country over the past two decades, most recently the massive droughts of 2018-2021 – comparable in scale to those of the late 1990s. At the macro-economic level, the Afghan state remained heavily dependent on foreign assistance: a staggering 75 per cent of governmental spending was funded through foreign aid²⁰, with total aid (civil and security) amounting to over \$8 billion annually – equivalent to 40 per cent of Afghanistan’s GDP²¹.
60. Despite the investment of billions of dollars in development aid, the state’s foundations remained fragile over the previous twenty years, plagued by pervasive corruption²² and a lack of robust governance. These elements combined to create a vacuum of internal legitimacy and local ownership that undermined nation-building efforts. The Taliban insurgency gained increasing momentum within this context, causing mass displacement and intensifying the population’s vulnerabilities. Geopolitical and political-economic factors contributed to this complex situation.
61. The period leading up to the Taliban’s takeover saw an exacerbation of this situation, compounded by the global COVID-19 pandemic. The pandemic’s impact almost doubled the number of people requiring humanitarian assistance to roughly half the population²³. Simultaneously, around thirty million individuals depended on social assistance from the government and development organizations to meet their basic needs and prevent an escalation of humanitarian needs, as highlighted in the HRP 2018-2021. Against this backdrop, significant portions of the Afghan population found themselves heavily reliant on assistance when the Taliban assumed control of the country.
62. Finding 2A. Pre-existing factors account for much of the current levels of vulnerability among the Afghan population. This was, to a considerable extent, an ‘exposed’ crisis as much as a new one. Economic and policy factors have significantly exacerbated needs and vulnerabilities, though these differ more in scale and intensity than in nature from the prevailing circumstances before August 2021 – especially in rural areas. In urban areas, the shock of sudden unemployment among former security workers, civil servants, and those working for collapsed businesses resulted in a new crisis of acute urban poverty and a new humanitarian ‘caseload’.

15. Afghanistan ranks as one of the countries most affected by landmines and unexploded ordnance in the world. See the Costs of War project: <https://watson.brown.edu/costsofwar/costs/human/civilians/afghan>

16. See for example Barfield T. (2010). Afghanistan: A Cultural and Political History. <https://www.jstor.org/stable/j.ctt7sqkc>

17. These efforts have led to significant gains, including a reduction in maternal mortality from 1450 maternal deaths in 2000 to 620 in 2017. <https://www.macrotrends.net/countries/AFG/afghanistan/maternal-mortality-rate>

18. <https://data.worldbank.org/indicator/SE.PRM.ENRR?locations=AF>

19. AAN (2010). <https://www.afghanistan-analysts.org/en/reports/context-culture/afghanistans-not-so-hermetic-rural-urban-divide/>

20. Centre for Strategic and International Studies (2022). <https://www.csis.org/analysis/reshaping-us-aid-afghanistan-challenge-lasting-progress#:~:text=Some%2075%25%20of%20all%20Afghan,and%2075%25%20of%20public%20expenditures>

21. USIP (2023). <https://www.usip.org/publications/2022/08/one-year-later-taliban-unable-reverse-afghanistans-economic-decline>

22. Afghanistan ranks 165th out of 180 countries and territories on Transparency International’s 2020 Corruption Perception Index (CPI). <https://www.transparency.org/en/cpi/2020>

23. HRP 2018 - 2021

Political and policy causes

63. The collapse of the former government and the subsequent takeover by the Taliban thrust the nation into a profound political crisis, which is closely tied to the humanitarian situation. Politics have heavily influenced international donor responses and limited the scope for action by the international financial institutions, which had played a central role in supporting Afghanistan's public finances, infrastructure, and services. These political dynamics led to the freezing of government assets, a widespread withdrawal of development funding, and policies of non-recognition and non-engagement with the new administration by many donors.
64. Contested legitimacy lies at the heart of many of these decisions. This is coupled with a high degree of mutual donor-DfA suspicion concerning motives and the use of aid.²⁴ The aid agenda is in a strange limbo as a result: despite the humanitarian 'People in Need' (PiN) figure remaining alarmingly high, donor appetite is dwindling for humanitarian assistance to Afghanistan and there is little appetite for developmental re-engagement.
65. The DfA in Afghanistan have placed ever-increasing limits on internationally funded and delivered aid since 2022. Such aid is suspected of being used as a tool of Western anti-Taliban policy, as are those delivering it, including both UN agencies and NGOs. Economic and social policy has taken a radical shift away from a national development agenda ostensibly based on human rights and the Sustainable Development Goals (SDGs), towards an as yet unclear model informed by Sharia as interpreted by the *de facto* authorities.²⁵ Amid the many crises unfolding in Afghanistan, an 'identity crisis'²⁶ is also taking place within the Taliban— reflecting clashing perspectives on the country's transformation, its future trajectory, and its engagement with the global community.
66. Because of these developments, many of those consulted for this evaluation explain the crisis in predominantly *political* terms, and specifically as a crisis deriving from the complex political-security factors that came to a head in August 2021 with the Taliban takeover. These aftershocks continue to reverberate. This explanation suggests the main drivers of the crisis have been and remain political and that the solutions depend on political progress. What constitutes 'progress' is contested. For many, especially in the US and Europe, the crisis of human rights – specifically the Taliban edicts affecting the rights of women and girls – is the defining feature of a political crisis. Indeed, it has been described as 'gender apartheid' by UN officials and others²⁷.
67. Finding 2B. Two main factors have shaped aid engagement in Afghanistan since August 2021: **the international political** reaction to the Taliban takeover and subsequent policies and the **attitude of the Taliban administration** to internationally funded and directed humanitarian aid. These two factors form the backdrop to most of the findings in this evaluation. **Mutual political antagonism and profound mistrust** characterize the relationship between the Taliban authorities and the international community, which in turn has a major impact on the aid agenda. The **main drivers of the crisis** and the main **limitations to the response** are policy-related – reflecting directly opposed political and ideological positions. The human rights situation for women and girls is the most prominent aspect of this opposition and one that has direct and indirect humanitarian consequences.

24. See for example AAN July 2023

25. See for example the 2020 Afghanistan Partnership Framework agreed between the government of the Republic and its international partners at a 2020 Afghanistan Conference (23-24 November 2020)

26. For a detailed discussion see Hassan Abbas 'The Return of the Taliban' [REF]

27. Situation of women and girls in Afghanistan - Report of the Special Rapporteur on the situation of human rights in Afghanistan and the Working Group on discrimination against women and girls. OHCHR, A/HRC/53/21: June 2023

Economic causes

68. Related to this political account of the crisis is another more direct explanation: the *economic* crisis precipitated by the events of 2021, which has had profound effects at national, local, and household levels. Following the Taliban's assumption of power, the US government froze the assets of Afghanistan's Central Bank, amounting to approximately US\$9.5 billion.²⁸ This act inflicted considerable harm on Afghanistan's banking sector and eroded trust in its financial system. The freezing of Afghanistan's assets also caused a domino effect, leading to a cessation of regular money transfers and transactions by Afghan entrepreneurs and commercial enterprises, subsequently driving up business costs and resulting in the loss of business confidence²⁹. In response to the looming collapse of the banking sector, the *de facto* authorities implemented a range of targeted restrictions, including limits on cash withdrawals beyond specified thresholds.³⁰ These measures, in conjunction with the Taliban's policy choices – including the appointment of individuals under sanctions to pivotal government positions –³¹ have collectively contributed to a decline in investor confidence that continues to obstruct economic growth.
69. According to World Bank estimates, Afghanistan's overall economy regressed by the equivalent of fifteen years of economic growth within a mere ten months following the Taliban takeover,³² precipitating substantial job losses.
70. While some economic progress was achieved in 2022, this hangs in the balance. Many observers attribute the preservation of a degree of stability to UN cash shipments, which reached \$1 billion in the first half of 2023, following \$1.8 billion in 2022.³³ These shipments will likely decline as the humanitarian response continues to suffer from significant underfunding. Adding to the complexity is the Taliban's ban on opium poppy cultivation, which has taken a heavy toll on rural Afghan communities, leading to a loss of approximately \$1 billion in earnings.³⁴ Combined with the loss of employment, this combination of factors has led to a grim economic outlook for Afghan households. The resulting scale of needs is extraordinary: some two-thirds of all Afghan households now struggle to meet their basic needs³⁵.
71. Finding 2C. Macro- and micro-economic factors present the most immediate cause of crisis in Afghanistan. Specifically, this crisis revolves around livelihoods – the erosion of sustainable means of living, the loss of job opportunities, and the growth of debt burdens and is reflected in the proliferation of extreme negative coping mechanisms.

Recurrent and structural causes

72. Many of the causes of the crisis are recurrent or structural. Almost all these are poverty-related, and include exposure to – and lack of resilience to withstand – economic and environmental shocks. Exposure to natural hazards and to the effects of climate change is a major continuing source of vulnerability. Afghanistan has long been highly susceptible to natural hazards, with droughts and floods escalating in scale and intensity in recent years.³⁶ These disasters exacerbate existing

28. https://www.researchgate.net/publication/370114077_IMPACTS_OF_THE_AFGHAN_FROZEN_ASSETS_ON_THE_TRADE_AND_BANKING_OF_AFGHANISTAN

29. Formerly, commercial cash transfers incurred a \$100 fee per \$1,000,000; this cost has surged to \$4,000 per \$100,000. (ibid)

30. Ibid.

31. <https://www.nytimes.com/2021/09/07/world/asia/taliban-women-protest-kabul-afghanistan.html>

32. UN Security Council Report (06/2022). The Situation in Afghanistan and its Implications for international peace and security. [SG Report A76/862-S2022/485](https://www.un.org/News/Press/docs/2022/06/220604_SG_Report_A76/862-S2022/485)

33. <https://www.usip.org/publications/2023/08/two-years-taliban-rule-new-shocks-weaken-afghan-economy>

34. Ibid.

35. <https://thedocs.worldbank.org/en/doc/e5065dff5ce7cced35c8d51150e90326-0310012022/original/WB-Afghanistan-AWMS-Brief-R2-Aug2022-V7.pdf>

36. <https://climateknowledgeportal.worldbank.org/country/afghanistan/vulnerability>. According to the World Bank, Afghanistan ranks 8th in terms of climate change vulnerability, manifested in recurrent drought and flooding.

challenges, resulting in job losses, diminished livelihood prospects, and compromised infrastructure. Cyclical droughts and water shortages directly threaten the sustainability of farming livelihoods that constitute a significant portion — around 60 per cent-70 per cent of the country's economy.³⁷ As a result, the country faces repeated food production deficits, affecting rain-fed and irrigated crops, in an economy that remains primarily based on subsistence farming.

73. Other natural hazards present an even more acute threat. The devastating earthquake in the east of the country in June 2022,³⁸ one of the worst in the nation's history, was part of a sequence of earthquakes that hit the region in the past twenty-five years (see Timeline in Section 1). The impact of flooding and severe winter weather acutely felt over the evaluation period, disproportionately affecting displaced individuals and those living in temporary shelters.
74. Afghanistan's susceptibility to natural disasters is significantly exacerbated by the lack of adequate investment in critical infrastructure at community level, including reservoirs for water storage, efficient irrigation systems, robust flood walls, earthquake-resistant buildings, and a range of other protective measures.³⁹ This has led to a gradual erosion of resilience within local communities, rendering them particularly vulnerable to the increasing threat of climate change. The destructive effects of disasters are magnified as a result.
75. Internal and external displacement and migration has been one of the defining features of the Afghan context over the past 40 years, related to conflict, economic factors and natural hazards. The return and reintegration of millions of Afghan refugees from earlier conflicts in the 1980s and 1990s saw major demographic shifts over the past twenty years. Displacement and return are a continuing phenomenon in the country. On average, each year before 2021, some 500,000 undocumented migrants returned from Iran and Pakistan;⁴⁰ 200,000-400,000 were displaced by conflict; and 250,000 persons were affected by natural disasters. At the end of 2021, UNHCR put the number of internally displaced people in Afghanistan at 3.5 million. Although many returned home since the end of the main conflict, many remain displaced.⁴¹

Compound risk and vulnerability

76. This convergence of factors has created compound vulnerabilities and risks for most of the Afghan population that are only partially captured in the broad 'People in Need' (PiN) or IPC classifications. Many of these vulnerabilities have acute and longer-term dimensions.
77. The main symptom of the crisis, and the one used as a primary indicator by the humanitarian system, has been the dramatically rising levels of household food insecurity since late 2021.⁴² This, in turn, is connected to many other forms of vulnerability. There was an increasing resort to damaging coping mechanisms over the evaluation period, including rising debt levels as well as more extreme measures: early marriage, child labour, school dropouts and other measures damaging to children. Distress migration from rural to urban areas and often illegally into neighbouring countries has created forms of vulnerability, social fragmentation, and insecurity. In short, families struggled to meet their basic needs over this period and have resorted to ever more extreme measures to do so.

37. <https://www.worldbank.org/en/country/afghanistan/publication/unlocking-potential-of-agriculture-for-afghanistan-growth>

38. The worst affected provinces were Paktika and Khost, with over 1000 reported dead, many more injured, and c. 10,000 houses lost or damaged. UN OCHA: Afghanistan: *Earthquake Response Lessons Learnt Exercise Final Report (Jan 2023)*. More recently, four large and destructive earthquakes hit Herat Province in October 2023.

39. See for example: <https://www.unocha.org/news/afghanistan-alarming-effects-climate-change#:~:text=Rising%20temperatures%20are%20rapidly%20altering,common%20sight%20across%20the%20country;https://reliefweb.int/report/afghanistan/climate-change-compounds-longstanding-displacement-afghanistan>.

40. At the time of writing, thousands of Afghan refugees and asylum seekers are reported to be threatened with expulsion from Pakistan: <https://www.hrw.org/news/2023/10/31/pakistan-afghans-detained-face-deportation>

41. UNHCR Global reports 2021-23. The IDP figure has reduced to 2.2 million in 2023 as a result of returns, 'UNHCR has recorded over 1 million IDPs who have already voluntarily returned since the end of the conflict and an estimated 60,000 refugee returnees and 680,000 IDP returnees are anticipated in 2023' <https://reporting.unhcr.org/operational/situations/afghanistan-situation>.

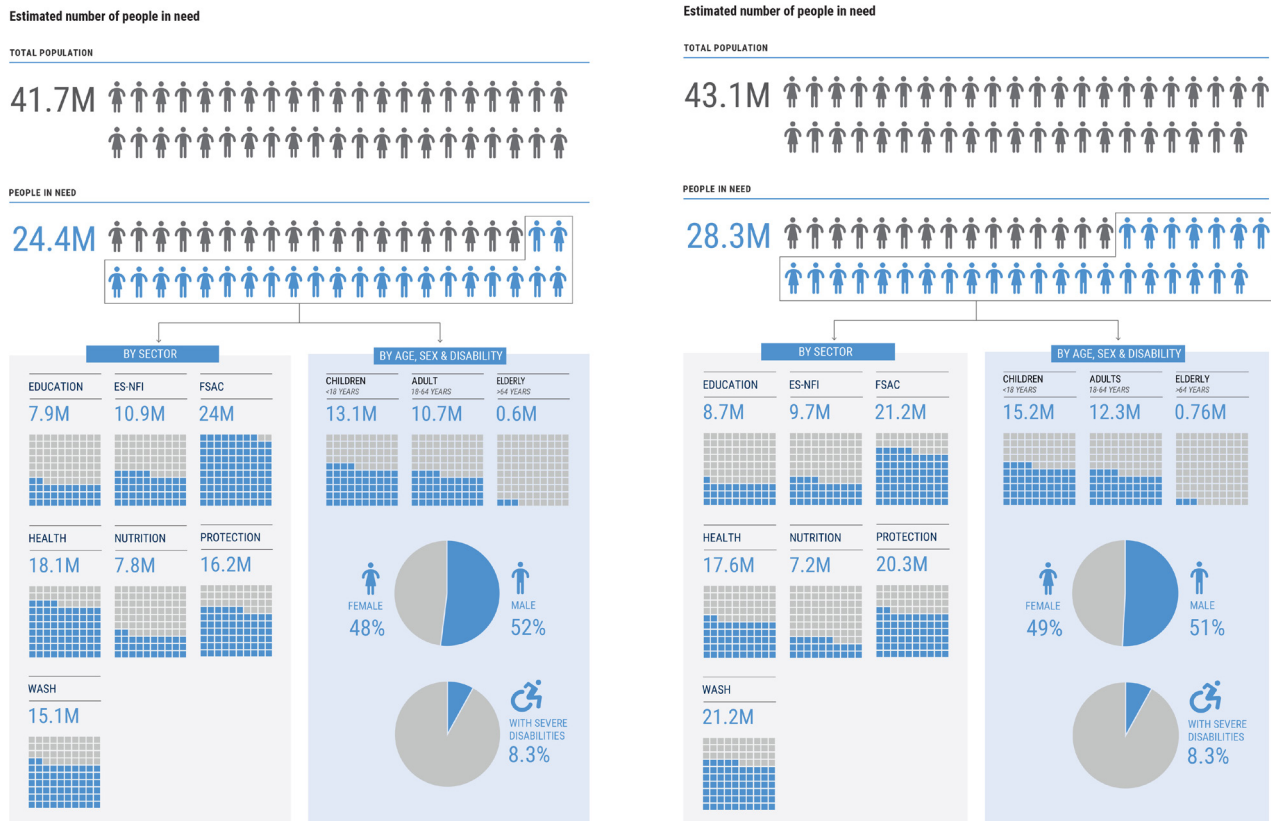
42. As measured through the IPC process – see Section 4 and Annex E

78. Other elements of the crisis regarding needs, risks and vulnerabilities are described in the following sections. The compound effects of these various risk factors on the security, well-being and prospects of ordinary Afghans are noted. This suggests the need to look beyond individual sectors in assessing vulnerability and consider more holistic approaches to programming. Given the structural factors involved, it suggests the need for multi-year planning and funding approaches.
79. Finding 2D. Although the humanitarian agenda focused on acute, short-term threats to the population, **many of the causes of the ongoing crisis are structural**, protracted or recurrent. The 'crisis' is not static but is evolving, creating new priorities and sources of vulnerability and, hence, a requirement for adaptive responses. Taken together, exposure to multiple simultaneous threats has contributed to rising levels of **compound risk** to the well-being and security of vulnerable Afghans. In many cases, the **risks to well-being and security have acute and chronic aspects** and relate to structural factors as much as the more immediate risk factors. Such threats are only partially amenable to humanitarian solutions and require multi-year planning and funding approaches.
80. The nature of the crisis – its symptoms and causes – determines the kind of response to it that is appropriate and necessary. The 'crisis' must be understood from the perspective of those experiencing it, and here further distinctions must be made. For the purposes of the evaluation, we distinguish the following broad and overlapping demographic groups:⁴³
1. Rural communities.
 2. The urban poor.
 3. Internally displaced people (many peri-urban) and returnees.
 4. People affected by extreme natural hazards (earthquakes, floods, extreme winter conditions).
81. The scale, distribution and breakdown of different types of need across the country is illustrated in Figures 2 above and 4 below.

43. These categories overlap in various ways. For example, even within rural farming communities, some family members may seek urban employment or migrate to neighbouring countries (Iran, Pakistan) in search of work.

Figure 4: People in Need Infographics 2022 vs 2023

Source: Afghanistan: Humanitarian Needs Overview 2022 and 2023; UNOCHA



82. Within the four broad categories noted above, the evaluation considered the extent to which the response addressed the specific vulnerabilities of women and female-headed households, children (both girls and boys) and young adults, and disabled and elderly people.⁴⁴ Some of the vulnerabilities in question relate to the effects of country-wide factors (including DfA edicts and policy decisions), but these often have different impacts in different provinces. More generally, needs and vulnerabilities vary according to geographic location and local social, economic, and political factors.⁴⁵

44. Two particularly striking facts emerge from demographic data. One is that Afghanistan is a very young society, with 35% aged 10-24 and only 3% over 65. (Source: World Population Dashboard – Afghanistan. UNFPA). The other is the extent of disability: levels of severe disability were put at nearly 14 per cent of the adult population in 2019 (Asia Foundation Model Disability Survey, 2019).

45. See Figure 4. The extent to which people living in different parts of the country have been affected differently is considered only to a limited degree, where major variations make this essential. While ethnicity also plays a part in vulnerability, the evaluation has not (with limited exceptions) been able to account for this.

BOX 1. Impact of Taliban policies on women and girls

The Taliban's decrees and bans have had multiple, compound effects for women and girls, including effects on their mental health. These effects and the response to them are discussed further in the following sections. The words quoted here illustrate some of the impacts on professional women from their own perspective:

'Since the day they took power, I have not been allowed to enter my school. They are excluding us from society by not allowing us to work alongside the men... All my classmates whom I am still in touch with are in the same situation. All of them are demotivated and depressed. I have lost my self-esteem during this last year.'

'I am angry. Women are half of a country, and we were not born to stay at home, cook or give birth. Let us work, let us learn, let us live!'

'There's a lack of women professionals in many sectors, and with these bans, there will be even fewer educated women. There will be no more women who will graduate to become teachers and doctors. This is a painful situation to endure.'

'[The ban] has a psychological impact on me. I am afraid. I am afraid that if I am not allowed to work, how will I support my family? Right now, I am the main breadwinner of my family. We are not in a good economic condition and my job is what gives us a stable livelihood.'

Quotes taken from 'As Afghan women and girls are erased from society, the UN in Afghanistan stands with them.'

<https://afghanistan.un.org/en/222053-afghan-women-and-girls-are-erased-society-un-afghanistan-stands-them>

Implications for the role of the humanitarian system

83. The role of the coordinated humanitarian system must be understood against the backdrop outlined above, and for the evaluation, we take that role to be somewhat broader than defined in the HRPs. For example, the agricultural and livelihood support programme led by FAO sits between humanitarian and development agendas but, in this context, is designed to perform a short-term and potentially existential role in terms of agricultural livelihoods and the survival of rural families. The role of the humanitarian system relating to the human rights crisis affecting women and girls has been largely limited to dealing with some of the more immediate humanitarian consequences. As Box 1 illustrates, the effects go well beyond the humanitarian.
84. The various **elements of the humanitarian crisis** might be summarised by sector as follows:
- **Food security and livelihoods:** an escalation of a pre-existing crisis, affecting over two-thirds of the population, the symptoms of which are loss of income and assets leading to extreme food insecurity and loss of ability to purchase essential goods and services. Causal factors include drought and water scarcity, agriculture system fragility and chronic under-investment; together with loss of employment, collapse of labour markets, and livelihood failure more generally.
 - **Nutrition:** a growing crisis of under-nutrition related to the acute food security and livelihood crises, as well as to chronic poverty. While the humanitarian focus is rightly on acute malnutrition, the extreme prevalence of chronic malnutrition (stunting) has not had sufficient attention. Acute malnutrition, in particular, is closely linked to elevated health risks.

- **Health:** the main features of this aspect of the crisis are high levels of public health risk (exposure to infectious diseases, poor nutrition, relatively low vaccination (EPI) coverage, high levels of disability, etc.); limited access to health care, and weak, fragile health care systems (primary, secondary, tertiary), together with a mental health crisis that is difficult to quantify but widely reported. Health risks are compounded by weaknesses in other sectors (including WASH), indicating the need for multi-sector approaches.
- **WASH:** is both a 'crisis' in its own right and a compounding set of risk factors related to chronic developmental deficits – particularly a lack of maintenance and investment in systems – and exacerbated by persistent droughts. For many, access to clean drinking water is becoming increasingly limited, either for physical access or the inability to pay for water provision. Water for agriculture is also becoming increasingly scarce. Coupled with poor sanitation, this creates risks to health, nutrition, education, and rural livelihoods. Difficulty in accessing WASH services also raises gender and equity concerns, with women, adolescent girls, and people with disabilities being disproportionately affected.
- **Protection:** Many of those consulted describe the ongoing crisis in Afghanistan as primarily a 'protection crisis' in which individuals, communities and whole demographic groups face threats to their safety, dignity, and overall well-being through the denial of rights. That is true, although there is a definitional problem here: how do the humanitarian and human rights agendas overlap, and how does the idea of a protection crisis relate to that of a humanitarian crisis? See further Section 4.
- **Education:** Here too there is a definitional challenge: how should the humanitarian or 'emergency' education agenda be defined as distinct from the broader developmental education agenda? For the one million girls currently excluded from secondary education, their situation seems to constitute an emergency in its own right. Concern revolves around the Taliban's prohibitions and the incapacity of the state school system to absorb rising numbers of students.
- **Emergency Shelter/Non-Food Items:** This is not as much a single or static crisis as a recurrent set of critical conditions related to harsh winter conditions facing those displaced and others without adequate shelter, heating and other physical necessities. This demands readiness to respond annually with 'winterization' support, together with ad hoc responses to new displacements. Here, the limitations associated with short-term aid responses (e.g., temporary shelter) risk perpetuating the cycle of crisis. In particular, the agenda of durable shelter for long-term, semi-settled IDPs is not well served by an emergency approach.

85. The evaluation reviews the relevance and likely effect of the collective humanitarian response against the understanding of the crisis components outlined above. It recognizes that the ability of the humanitarian system to respond to the indicated requirements for tackling each sector component of the crisis is limited by agency mandates, aid restrictions and conditionalities (particularly those relating to system strengthening and infrastructure); access, permissions and limitations on agencies from the DfA; and capacity constraints (funding, human resources, partner capacity, etc.). The recent downward trend in humanitarian funding makes the resourcing situation particularly acute.^{46 47}

46. A letter published in August 2023 from the heads of leading UK INGOs stated that 'we are gravely concerned that a second withdrawal from Afghanistan is under way: a withdrawal of the resources available to relieve this desperate situation. The UN humanitarian response plan quantifies the need for lifesaving assistance in the country at \$3.23bn; at the start of August, less than 25% of this has been raised.' They warned that the deterioration of the country's economy has turned the pre-existing crisis into a catastrophe and that aid cuts threatened to bear disproportionately on women and girls. <https://www.theguardian.com/world/2023/aug/15/two-years-on-we-fear-that-a-second-withdrawal-afghanistan-is-under-way>

47. This recent report illustrates the problem of maintaining substitutory services: 'On 31 August, the International Committee of the Red Cross announced it was terminating a project that has been funding 25 government-run hospitals across Afghanistan for nearly two years, as part of the organisation's efforts to cut more than \$475 million of costs globally. The ICRC insists that support to the Afghan hospitals, which covered everything from the salaries of more than 10,000 health workers to medicines and ambulance and generator fuel, was only ever meant to be a temporary response to the Taliban's 2021 return to power... and was never envisioned as a "substitute or replacement for government functions" in the country.' Source: The New Humanitarian, 25th September 2023. <https://www.thenewhumanitarian.org/>

86. Finding 2E. The humanitarian system has been performing functions in relation to basic services that it was not designed to perform in anything but the short term (emergency substitution) in the absence of substantive partnership with government ministries. This substitutory and parallel role provides no clear pathway to the recovery of state systems. Performing functions analogous to emergency medicine combined with 'life support' for essential systems, the system lacks the tools and resources to do either job properly – let alone work that might have more sustainable effect. This highlights the need for a properly planned and funded 'basic needs' (service support) programme.

BOX 2. What aid paradigm applies in Afghanistan?

Afghanistan does not fit the standard 'post-conflict' model of aid, in which relative peace, security and political stability bring investment and development funding alongside humanitarian assistance to help consolidate a new political settlement and to support a process of recovery and reconstruction. Western donors followed this model in Afghanistan in the period following the 2001 invasion; but in 2021, they had no desire to consolidate the new political situation. Donor hesitancy to engage with the Taliban-led government is explicitly rooted in concerns about legitimizing a regime that lacks commitment to human rights, gender equality, and inclusive governance. Major donors have chosen a 'state-avoiding' strategy, minimizing direct interaction with *de facto* authorities, and channelling aid primarily through the United Nations agencies and World Bank and ADB-administered trust funds.

Against this political backdrop, the standard 'triple nexus' paradigm linking humanitarian, development and peace-building agendas has no clear application. While both donors and the Taliban government share a mutual interest in averting instability, achieving 'peace' in this context challenges conventional norms of 'positive peace,' an idea inconsistent with the Taliban's policy choices. The development paradigm, typically based on supporting and strengthening relevant state systems and institutions, breaks down in this case as major donors are politically required not to bolster the new regime – and the IFIs are limited by mandate. Against this political backdrop, a new model of humanitarian assistance has emerged blended with elements of direct, state-avoiding support to essential systems like health – a mix sometimes called 'humanitarian plus' or 'development minus.' This hybrid approach raises questions about coherence, feasibility and long-term sustainability.

A related 'basic needs' agenda informed the UN's Transitional Engagement Framework of 2022 as it does the recent UN Strategic Framework for 2023-2025. The Executive Summary of the latter states that: The United Nations and its partners recognize humanitarian aid alone will not be enough to sustainably address the large-scale and increasing human suffering of the Afghan people in the medium and long term. As such, humanitarian efforts should be complemented and reinforced with interventions addressing basic human needs that aim to reduce the humanitarian caseload over time and support Afghans, particularly women, girls, and other vulnerable groups, to a) build resilience to shocks, b) sustain livelihoods, c) protect human rights and fundamental freedoms, d) strengthen social cohesion and build social capital, and e) preserve hard-won development gains achieved over the past two decades, including service delivery.

While this rightly acknowledges the limits of the humanitarian agenda, it suggests a level of ambition that is very far from the prevailing realities in Afghanistan.

SECTION 3:

THE AID RESPONSE: PREPAREDNESS, TRANSITION, SCALE-UP

Overview

87. This section covers the evolution of the humanitarian response from the period immediately preceding the Taliban takeover in August 2021 to the subsequent aid transition, scale up and strategic shift. It considers the state of the humanitarian agenda before August and the extent to which the humanitarian system was prepared for what followed. It then considers the radical shift in aid engagement that followed the fall of the Republic and the related strategic and operational challenges of delivering at scale in the uncertain environment that followed.⁴⁸
88. Programme performance is considered sector by sector in Section 4 below. This section is concerned with the evolution of the collective humanitarian response relative to the overall humanitarian picture and the dramatic rise in people assessed to require humanitarian assistance ('People in Need' – PiN) after August 2021.

Humanitarian context January to August 2021

89. For many years leading up to 2021, the Taliban insurgency had been growing in strength. The 2020 Doha agreement between the US and the Taliban, to which the Afghanistan government was not party, heralded the withdrawal of the US and other armed forces and left the Afghan National Security Forces alone, demoralized and ill-equipped to face the mounting insurgency. The months preceding the political transition of August 2021 were a period of increasing instability and insecurity as the Taliban's control over territory expanded rapidly from May 2021 and extended to provincial capitals as well as rural areas.
90. One consequence of the security situation was the mass displacement from rural to urban areas, creating a growing caseload of internally displaced people in need of urgent support. The direct and indirect effects of the COVID-19 pandemic were still felt, while drought affected crop production prospects. This was a continuation of the sequence of droughts that had hit the country since 2018, the result of which was rural households were already food insecure, highly indebted, and lacking in capacity to withstand further shocks.⁴⁹ The economic crash that followed later that year was particularly damaging as a result.

48. That scaled-up response is reviewed in part through analysis of the related data, particularly those related to funding and the relative scale of different elements of the response. The relevant data and trend graphs can be found in Annex A.

49. As the HRP 2021 Summary noted: *The proportion of households living with an 'emergency' Livelihood Coping Strategy Index (LCSI) score has more than doubled (from 16 per cent in 2019 to 42 per cent in 2020).*

BOX 3. The situation before August 2021

The pre-existing humanitarian situation was alarming, and the response to it was inadequate, limited by available funding and restricted access. The HRP 2021 Summary describes the situation in these terms: Nearly half of the population (18.4 million people) is in need of humanitarian and protection assistance in 2021... Already, more than one third of the country is facing crisis or emergency levels of food insecurity and nearly half of all children under-five are expected to face acute malnutrition in 2021. Protection and safety risks to civilians, particularly women, children and people with a disability, are also on the rise. Demand for assistance is soaring at the same time that humanitarians are facing increased attacks and interference in their work... More than four months into the year, however, the HRP remains only 12 per cent funded.¹

Afghanistan: Humanitarian Response Plan Summary 2021, UN OCHA – May 2021

91. The humanitarian sector before mid-2021 was described by many informants as passive, having apparently reached a point of accommodation with the difficult status quo created by the ongoing conflict. Before August 2021, the humanitarian focus was on specific vulnerability categories (IDPs, refugees, returnees, victims of natural disasters), with only limited efforts to push to expand interventions into the Taliban-controlled and hard-to-reach 'white' areas.⁵⁰ Most of these efforts were by a relatively small number of international NGOs (and the ICRC) working with national counterparts. Given the ongoing conflict and the requirement to negotiate multiple front lines, working in these areas was challenging and high risk. In addition to this, the Taliban and the government of the Republic put up obstacles to 'cross-line' work.⁵¹ While the present evaluation is not tasked with evaluating the earlier response, many of those consulted believed the response significantly 'bunkerized' and concentrated around government-controlled urban centres.⁵² One of the effects of the conflict was to limit people's access to services like healthcare – a situation that changed after August 2021. Despite ongoing displacement and natural hazards, the humanitarian system was not on a proper 'crisis' footing even by the summer of 2021.⁵³
92. Finding 3A. The humanitarian situation in Afghanistan was already very serious before the August 2021 transition – but the response to the pre-existing crisis was inadequate in scale and reach compared to needs. The effects of conflict, aid insecurity and lack of permissive access to work 'cross-line' were the primary reasons for this, with limited funding and an overall lack of collective will to respond. One result was the system struggled to adapt quickly to the scale of the new challenge.

Humanitarian system preparedness

93. The lack of preparedness efforts for the scenario that unfolded during the summer of 2021 can be explained by the relative inertia of the humanitarian system up to then. As the Taliban extended their control to provincial capitals and district administrative centres over the course of the year, some confidential scenario discussions were reportedly held,⁵⁴ but the evaluation found no concerted effort

50. 'White' areas were those not controlled by the government, most of which were controlled by the Taliban.

51. The Republic government was hostile to the idea of negotiating with the shadow Taliban administration and wary of providing them with any potential material benefit. More generally, the government was reported to have been increasingly reluctant to accept internationally supported humanitarian assistance in any part of the country, something evidenced in the long backlog of unsigned MoUs with NGO (a striking parallel with the current situation with the DfA).

52. Some expressed concern that the post-August 2021 was also overly concentrated in urban areas, creating a magnet effect and tending to increase displacement.

53. Some informants suggested that only the ongoing drought response together with the response to the COVID-19 epidemic had really kept the humanitarian agenda alive

54. Based on conversations with senior OCHA staff

by the HCT to plan for the political transition that transpired in practice. UNAMA's efforts to promote peace continued until August 2021 but to no avail. It appears as if there was some degree of denial about the emerging realities of the situation.⁵⁵

94. The events that unfolded in August 2021 were predictable from the middle of that year, even if the timeframe and pace of events were not. 'Nobody expected things to unravel so quickly' was a typical response from informants. Much reliance seems to have been placed on US security and intelligence sources concerning the likely course of events. Some informants suggested that the concerns of local staff warning of an imminent collapse were downplayed. The political and economic fall-out from the potential collapse of the government and ascendancy of the Taliban, although not predictable in detail, was nevertheless foreseeable in some of its features – including the likely suspension of development cooperation.⁵⁶
95. In practice, some agencies and Clusters (notably FSAC) were better prepared to respond to the change of circumstance than others. The ongoing drought response by WFP and its partners meant significant stocks of food had been pre-positioned;⁵⁷ UNHCR had taken a range of preparatory steps;⁵⁸ and some Clusters (FSAC, and to a lesser extent Nutrition and ES-NFI) were already undertaking a strategy review of their respective responses. The evaluation notes that those agencies that already had a working relationship with the Taliban shadow authorities appeared to be better placed to continue working without interruption – and to extend their area of operation after 15 August 2021.
96. Finding 3B. The evaluation found that not enough was done to anticipate and prepare for the crisis that followed the collapse of the government and takeover by the Taliban. Specifically, the withdrawal of development assistance in key services, the effects of such withdrawal, and the likely need to reconfigure and scale up the humanitarian response were plannable scenarios. Even more important than planning was organizational and strategic flexibility, which enabled a fundamental strategic shift. In practice, this was very variable across the sector.

Impact of transition on the aid system

97. The period around the fall of Kabul on 15 August 2021 and the establishment of an interim Taliban authority was one of great uncertainty, fear and 'chaos' in the international system, as well as for the individual Afghans and civil society organizations who worked with that system – or with the deposed government. 'The discussion at that time was not how to respond but how to evacuate.'⁵⁹ The collapse of the government and the Republic's security system resulted in multiple areas of uncertainty and risk around staff security, the status of programmes, and the identity of official interlocutors in the new de facto authorities. Parallel to the very visible exodus of US forces and the withdrawal of UNAMA political staff was the less visible exodus of international aid staff, both UN and NGO, on the grounds of security and in some cases a reluctance to deal with the Taliban authorities. Some INGOs relocated to the security of UN compounds. Afghan staff were left without guidance and in considerable fear. One senior UN official noted a transfer of risk to NGOs and local UN staff. 'Local staff were left alone in finding ways to navigate the new environment and relationships with DfA. Some said "we'll meet the DfA but we need an international to go with us"'

55. A UNAMA representative briefed the HCT on 5 August 2021 that there has been 'no progress on the peace process since the last HCT briefing as parties to the conflict seem more interested in a military solution at the current time.' [HCT 050821]

56. Planning around such a course of events was certainly politically sensitive, which may partly explain why it was not undertaken more concertedly.

57. Interviews with WFP staff

58. Evaluation of UNHCR's Response to the Level 3 Emergency in Afghanistan 2021-22 (p.41): <https://www.unhcr.org/sites/default/files/2023-07/evaluation-report-l3-emergency-afghanistan-june-2023.pdf>. The UNICEF L3 evaluation by contrast, found that 'UNICEF – along with the broader aid community – was unable to plan for [these events] in a way that measurably helped with the scale-up of operations once L3 was activated' <https://www.unicef.org/evaluation/reports/#/detail/18938/evaluation-of-the-unicef-l3-response-in-afghanistan>

59. KII with OCHA, Kabul

98. The exodus of international staff led to a loss of human capacity in both the development and humanitarian aid systems. Some of those interviewed suggested that ‘new blood’ was required for the newly emergent humanitarian role given the radical shift of gear required. For those that remained, this was a hard transition, the psychological dimensions of which should not be underestimated. For many staff, it was extremely difficult to make the adjustment. As one senior UN official put it, ‘The ‘human factor’ was one of the reasons for this slow adaptation, as well as the emotional factor. Many staff struggled in shifting mode and pace.’
99. The lack of staff with humanitarian experience was a significant initial limitation, a result of the previously development-oriented organizational focus. It took time to rectify this using scale-up protocols and agency emergency procedures (see below). The post-war state of critical infrastructure, the collapse of the banking system, and uncertainty about travel security were major hindrances to the initial response. It took some time for this to ease, with UNDSS at first imposing strict road transport conditions. As the HCT minutes make clear, agencies struggled to get sufficient cash to pay staff and partners during this period. Against this backdrop, one senior UN official commented, ‘I think what we achieved was miraculous.’
100. The ending of the armed conflict led to a radical improvement in access. For many Afghans, particularly those in rural areas, access to government-provided services like health care had been limited for many years, and access for aid agencies had been problematic and limited during the war, in terms of physical security and permissive access. That picture changed relatively quickly after 15 August. Despite air logistic challenges, road access was quickly established to all parts of the country. This enabled a rapid assessment process that was fairly comprehensive in geographic scope, if not in-depth data.
101. In this context of evident need and improved access, UN operational agencies (supported by the ERC) agreed they must ‘stay and deliver’ despite the general exodus of development and political staff. That was a well-founded and brave decision, reportedly made in the face of considerable opposition from some agencies within UNAMA. The scale of the undertaking was not immediately clear. The HCT (including donors) concluded in its meeting on 19 August 2021 that a Flash Appeal was not required, that information was sufficient, and that the existing HRP provided an adequate basis for proceeding. That view was soon to change.
102. Finding 3C. Most of those consulted felt that the decision by operational UN agencies and the ERC to ‘stay and deliver’ was the right one in principle and both justified and demanded by the circumstances. They were well supported by key donors. The work of both INGOs and NNGOs suffered more disruption, and they (like the UN agencies) took some weeks to re-orient to the new situation. Most agencies lost experienced staff capacity after the transition. During this period, many Afghan staff were left exposed and expected to carry too much of the burden of initial engagement with the Taliban authorities.

Scale up and shift of aid engagement model

103. By the end of August 2021, the need for a major scaling up of the humanitarian response was becoming clear both in-country and at higher levels within the international system – as was the corresponding need to mobilize considerably more resources.⁶⁰ A Flash Appeal was duly launched in early September to supplement the 2021 HRP and cover additional needs through to the end of the year.⁶¹

60. ‘The HC said the SG has expressed serious concerns about the funding level to Afghanistan and that a strong funding mobilisation effort will be undertaken following the ERC’s visit.’ HCT minutes 2nd September 2021.

61. Afghanistan Flash Appeal for Immediate Humanitarian Response Needs - September to December 2021 (UN OCHA). The appeal document states that ‘The plan urgently seeks \$606.2 million to provide prioritised multi-sectoral assistance to 11 million people in the four remaining months of 2021. \$413 million of this is already costed within 2021 HRP requirements, while \$193 million are new requirements. At present, the 2021 HRP remains only 39 per cent funded’ (p.6)

104. The Flash Appeal was essentially an extension of programmes already outlined in the 2021 HRP. However, the appeal also warned of the effects of disruption to basic services, given the high dependence (over 70 per cent) of the previous government's civil budget on international funding. 'This [funding] supported basic health and education as well as the maintenance of critical infrastructure. Without a rapid re-establishment of and sustainable funding for those systems, critical concerns remain that the 37 million people who already live on under \$2 a day will fall into... catastrophe.' The appeal document warned specifically of the effects of any delay or discontinuation of development funds on programmes such as the Sehatmandi project for basic health service provision. 'Without a clear understanding on how these services will be funded in the immediate term, critical gaps are anticipated in health and nutrition systems.' This was to be a dominant concern over the following months.
105. The subsequent HNO and HRP present a clearer picture of the response needs and vast resourcing requirements for the more ambitious targets. The single clearest indicator of the extent of the scale-up was the increase in the target for the food security and livelihoods response, which had risen from 3.9 million people in 2019 to 14.2 million people in 2021, to 21.6 million in 2022 – the 2022 target involving delivery of considerably larger food assistance and livelihood packages to those targeted. The corresponding budget requirement rose from US\$553m in 2021 to US\$2.66 billion in 2022.⁶² Increases in budget requirements in other sectors were also dramatic, in most cases doubling or tripling from 2021. As the charts in Annex A show, the donor response matched the demand, reflecting the urgency of the situation and the political importance attached to it.⁶³
106. One overall effect of the scale-up was to inject large amounts of cash into the Afghan economy, brought in by the UN agencies, when banking and currency restrictions meant that cash and foreign currency were in short supply. The effect of this cash injection into the economy is generally considered crucial in macro-economic terms⁶⁴ but is beyond the scope of this evaluation. It is noted that any large-scale package of humanitarian assistance – particularly when it becomes protracted in nature – is likely to become an integral part of the political economy of the country in question. In the case of Afghanistan, the effects appear to have been positive, though concerns remain about perpetuating aid-dependent systems as well as about aid diversion.
107. Different elements of the response moved at different paces.⁶⁵ The deteriorating food security situation was the dominant concern. WFP and to some extent the FSA Cluster were the fastest to respond among the agencies. They were helped by several factors: preparedness measures that were already in place for the drought response (including pre-positioned stocks); WFP's organizational flexibility and the ability to pre-finance some elements of the response, given strong backing from the donors; and a relatively simple 'transfer' model for food assistance (food, cash, vouchers), albeit one that was complex in terms of the identification of large numbers of new beneficiaries and operationally challenging to mount, not least in terms of procurement and delivery partnerships. The speed and extent of the scaled-up food assistance response was remarkable, especially given the complexities and uncertainties involved. Though some FSAC members felt 'left behind' and that joint re-assessment of needs was lacking, most agreed the need to move quickly justified the overall approach.⁶⁶

62. The 'cost per person' calculation for Food Security and Livelihoods increased in the 2022 HRP to \$123 from the previous average of \$52 'due to the need to increase to a 75 per cent food basket over a longer period, and more intensive emergency livelihood activities.' Nevertheless, the figures raise questions about efficiency and cost of delivery in this sector. These lie beyond the scope of this evaluation to investigate further.

63. Many informants attributed this to the responsibility (some said 'guilt') felt by major donor governments for 'abandoning' the country and its people in 2021, and for the subsequent economic isolation and suspension of development funding to Afghanistan. It partly reflected a reorientation of the previous development agenda towards humanitarian support.

64. 'The U.N. humanitarian cash shipments (\$1.8 billion over the past year) ... are propping up the Afghan economy and are essential for maintaining exchange rate stability and containing inflation.' Byrd, W. Afghanistan Requires a Change from Humanitarian Business as Usual. <https://www.lawfaremedia.org/article/afghanistan-requires-change-humanitarian-business-usual>

65. Section 4 below reviews the scaled-up response across all main sectors. Here we consider only the three largest sectors.

66. Interviews with FSAC Cluster members

108. The related FAO-led emergency support programme to agriculture and rural livelihoods understandably took longer to mount, given the radical change in the operating model (previously involving close collaboration with the Ministry of Agriculture) and the need to raise unprecedented levels of funding. The success of this was thanks to substantial backing from the World Bank and Asian Development Bank for early intervention in this sector.⁶⁷
109. The role played by the Health Emergency Response project (HER), covering primary and secondary health services following the end of the Sehatmandi project, was crucial, focused on the more urgent health needs – although it took a year to fully establish.⁶⁸ A stable funding arrangement for the project took months to establish (see section 4 below) and required bridging funds from UNDP and the CERF before the World Bank resumed funding.⁶⁹ Much of the initial focus was on preventing the collapse of existing systems and ensuring payment and retention of health staff, many of whom had already left.
110. The Nutrition response to the crisis also depended on the continued functioning of health facilities through which the therapeutic feeding component was delivered. For children with severe acute malnutrition (SAM), the number of admissions doubled between 2021 and 2022, from around 300,000 to over 600,000. In the face of rising levels of global acute malnutrition, maintaining and scaling up the overall nutrition response was a crucial part of the response. By ‘piggy-backing’ on its general food distribution network at local level, WFP was able to mount a scaled-up blanket supplementary feeding programme (BSFP) to address the rising levels of moderate acute malnutrition (MAM). In line with its overall scale-up, the target for BSFP rose dramatically, from around half a million people in 2021 to more than 2.5 million people in 2022.
111. The extent to which scale-up protocols – system-wide and agency-specific – enabled the response to scale up in practice is difficult to quantify.⁷⁰ Most informants agreed that the primary benefit of system-wide and agency-specific scale-up protocols was in enabling the rapid deployment of specialist human resources. The global clusters (particularly for FSAC and Health) played an important role in strengthening the relevant in-country coordination mechanisms. The system-wide protocol (Scale-Up Activation) had the additional benefit of providing for a Deputy Humanitarian Coordinator, which was felt to have been an essential addition to the collective senior leadership, enabling a division of labour with the HC at a time of extreme pressure of work, and providing a valuable troubleshooting role to access and operational issues arising with the DfA.
112. A number of informants raised issues about the various scale-up processes. Some felt there was a lack of harmonization between agency L3 protocols and the system-wide protocol, which added to existing confusion between system- and agency-mandated roles. There was also concern that the related indicators and benchmarks for the system-wide protocol were too complicated and too open to interpretation, as they are qualitative rather than quantitative. This contributed to a lack of clarity on accountabilities. On the overall utility of the system-wide protocols, one UN informant summarised their view as follows: “Scale- up initially served a useful purpose, agencies putting boots on ground in places we were not before. But its value plateaued. It was extended till March 2023, but there was no value added in the last 9 months.”
113. One of the challenges to simultaneously scaling up and changing the operating model was the need to reconfigure partnership arrangements – particularly, to identify and train new implementing

67. Around 35% of funding for the agriculture response was raised outside the HRP [KII 4 and donor reports].

68. Interviews with UNICEF staff; Global Health Cluster staff, WHO

69. Support from GAVI for essential vaccination programmes (including EPI, polio and COVID-19) was uninterrupted.

70. See further the recent IAHE learning paper on the IASC System-Wide Scale-Up Mechanism (‘From Protocol to Reality: Lessons for Scaling Up Collective Humanitarian Responses’, February 2024), which draws lessons from the experience of applying the system-wide scale up protocols to the collective crisis responses in Northern Ethiopia, Haiti and Somalia, as well as Afghanistan.

partners for scaled-up operational programmes. UNICEF had previously worked with and through governmental partners, with limited NGO implementing partnerships. With the change of the engagement model post-August 2021, that model was reversed. While continuing to work with some of the remaining technical staff in the various departments and ministries, UNICEF had to expand its partnerships with both national and international NGOs.⁷¹ The challenge for WFP was slightly different. Its operating model remained essentially the same and it already had a large network of implementing partners. However, given the extent of its scale up and the need to operate in new areas, it too had to expand its range of implementing partners, which roughly doubled in number from around 50 to 100 between 2021 and 2022. For these and other agencies that attempted comparable expansion of operations, concerns about the quality of delivery through new and untried partnerships appear to have been largely subordinated to the imperative of delivering quickly and to scale.

BOX 4. The case of UNICEF

Straddling the development and humanitarian agendas, and covering multiple sectors, UNICEF presents an interesting case study with regard both to scale-up and shift of engagement model. Prior to the political transition of 2021, UNICEF had a development-oriented programme that entailed close collaboration with a number of different ministries. Following the August 2021 events, UNICEF implemented a scale-up plan that involved a major shift into humanitarian and operational mode, as reflected in UNICEF's extraordinary request for US\$2 billion for its Afghanistan response as part of its Humanitarian Action for Children (HAC) in 2022.*

In order to implement this plan, UNICEF undertook an HR surge, in part to replace some of its national staff who had left the country. This involved reassigning UNICEF staff from other countries, deployed to Afghanistan for 1-2 years while retaining the right to return to their original posts. Staff interviewed considered this a success and a potential lesson for future scale-up operations. However, the UNICEF L3 evaluation** notes various problems with staffing the scale up – related to lack of adequate preparedness, as well as challenges of deploying suitable surge personnel and integrating them into existing country teams. Tensions between emergency & development 'mindsets' appear to have been part of the problem.

* Humanitarian Action for Children 2022 – UNICEF, December 2021, New York. This was more than UNICEF stated requirements within the HRP, reflecting the fact that its agenda continued to extend beyond the humanitarian after 2021.

** Evaluation of the UNICEF L3 response in Afghanistan (August 2021–March 2023) – <https://www.unicef.org/evaluation/reports#/detail/18938/>

114. Finding 3D. Scaling up the collective response to the crisis was achieved more quickly in some sectors than in others. Scale-up protocols played a significant part in enabling the transition, with agency-specific protocols playing an important HR role. The speed and extent of scale-up in the food security and livelihoods sector was impressive, although there were some concerns about a trade-off between coverage (scale/speed) and the quality of response. This was perhaps inevitable under the circumstances during the initial response of late 2021, but less so in the subsequent response through 2022 and 2023.

71. This move was accompanied a lot of internal debate about which elements of its programme should be classified as 'emergency' and included in the HRP, and whether a focused or more blanket approach to targeting should be adopted. In the end, UNICEF went for a broad approach given the extremely high 'people in need' figures.

Strategic transition

115. The situation in Afghanistan as it evolved post-August 2021 demanded a major strategic shift from the aid community in general and the humanitarian sector in particular. The transition in the humanitarian agenda entailed a change in scale, aims, target populations and modus operandi. The change in scale and aims was driven by the rapid deterioration of macro- and micro-economic conditions and the loss of governmental service capacity. The radical improvement in access and security conditions allowed previously unserved areas to be reached. The overall rationale of the new approach might be described in terms of providing a temporary safety net for millions of families and ensuring continued (or new) access to essential services. In terms of modus operandi, agencies began working more directly in 'operational' mode, coordinated through the HCT and an expanded Cluster system, providing large-scale cash and commodity inputs to households (safety net), helping prevent the collapse of essential services, and substituting for – or mitigating the effects of – lost services. Previous partnerships with government departments were discontinued.
116. As noted in section 2 above (Box 2), the theory was that the humanitarian agenda would be complemented by a 'basic needs' support agenda, as set out in the UN's Transitional Engagement Framework (TEF) of 2022. Under the framework, the agenda articulated in the HRP constituted one of three priorities: (i) to provide life-saving assistance (HRP), (ii) to sustain essential services, and (iii) to 'preserve social investments and community-level systems essential to meeting basic human needs.' In practice, the humanitarian agenda extended into the second priority, where it was combined with limited 'developmental' interventions through the same agencies (including UNICEF and WHO) but with divided funding streams, including funds administered by the World Bank and Asian Development Bank. Donor unwillingness to support developmental forms of engagement meant the basic needs agenda was only supported to a limited extent.⁷² Unlike the humanitarian component, the basic needs elements lacked a related delivery plan. Some informants, notably in the WASH sector, felt that the TEF had engendered tensions and confusion over roles and aims, with one Cluster member suggesting it had been a 'total failure.'
117. One factor shaping the approach of many agencies was the view that the humanitarian sector's role was to provide a 'bridge' pending the establishment of political relations between the DfA and the international community and the subsequent resumption of development cooperation – something that was expected by many to take a few months. This was perhaps an unrealistic assumption in retrospect. The practical consequence was that some agencies (including the ICRC) took on an essential 'bridging' role that they struggled to sustain in the absence of related funding commitments.⁷³
118. The HRP for 2022 followed the same basic strategic framework as that for 2021,⁷⁴ and was comprised of: (i) a relief component (SO1, framed as 'life-saving'); (ii) a rights-based protection component (SO2); and (iii) a resilience component focused on rural livelihoods and on displaced people and returnees (SO3). For the reasons described above, the majority of the response fell under SO1, and continued into 2023.⁷⁵ The 2022 plan was still framed around previously defined vulnerable groups, because the changed pattern of vulnerability was not fully understood by the end of 2021 when the 2022 plan was written. Displacement and vulnerability to the effects of conflict and natural hazards, while still factors, were no longer the defining features of the crisis. It was not until the 2023 HRP that this was articulated in the response plans.

72. As noted in a recent study, UNAMA sought in late 2021 to explore pathways to some forms of engagement between the international community and Taliban authorities, initially based on technical support to key ministries. But while the donor community wanted to maintain the UN political presence, 'in practice it has been reluctant to see any political engagement and has ruled out any form of technical support to the Taliban.' p.23, Navigating Ethical Dilemmas for Humanitarian Action in Afghanistan – Humanitarian Outcomes for UK HIH, June 2023.

73. On the ICRC's role, see footnote 47 above.

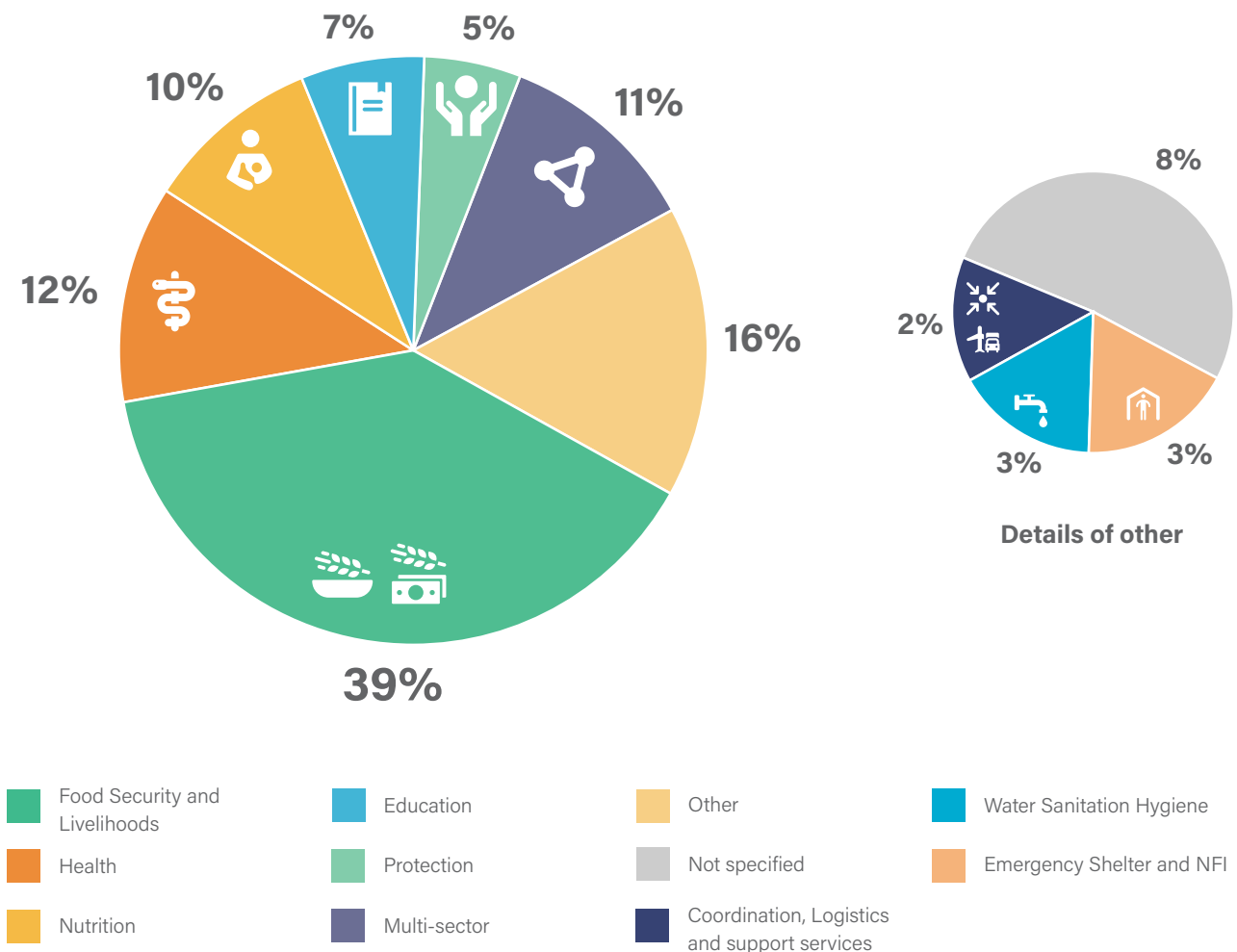
74. See the January 2021 revision of the 2018-21 HRP.

75. The strategic objectives in the 2023 HRP are essentially the same as for 2022.

119. This shift in the understanding of the crisis and response priorities is reflected in the text of the 2023 HRP.⁷⁶ It notes the commonality of needs for the majority of people but that ‘the largest distinctions are the differences between urban and rural dwellers who face different types of challenges.’ Recognition of the urban crisis is reflected in the targeting of assistance, with the highest number of people targeted being in Kabul province (4.5 million), ‘due to the concentration people in urban settings who are now facing crisis and emergency levels of food insecurity and malnutrition’; followed by Herat and Nangarhar provinces. The 2023 sub-objectives under SO3 began with ‘emergency livelihood support to vulnerable urban and peri-urban households.’
120. Finding 3E. The strategic shift required by the events of August 2021 and their aftermath was achieved partially and gradually over the evaluation period. Just as it took some months to re-orient and scale up the overall collective response to address the escalating crisis, so it took too long to recognize how the nature of that crisis had changed – and how the response needed not just to expand in scale but to change in terms of targeting and content. The changed context included increasingly tight restrictions on the freedoms of women and girls. The intended synergy between the humanitarian and the underfunded basic needs agenda was achieved to a limited extent, with the health sector being the most positive example. The crucial ‘bridging’ function played by some agencies in maintaining systems and the delivery of services was strained to breaking point by the lack of forward funding commitments.

Figure 5: Proportion of total funding received by sector (2022)

(Data source: fts.unocha.org)



76. HRP 2023, p.19

SECTION 4:

THE AID RESPONSE: COVERAGE, RELEVANCE, EFFECTIVENESS

Introduction and overview

121. Earlier sections considered how the humanitarian response in Afghanistan adapted and scaled up to meet the new challenges that followed the events of August 2021. This section reviews the coverage, relevance, effectiveness and impacts of the collective programmatic response to the crisis, considered by sector and Cluster.^{77 78} It assesses the reach and targeting of that scaled-up response, its rationale, and its likely effects, given the context and operational constraints. It also considers the more general question of benefit provided.
122. The meaning of terms like 'reach' (and 'target achievement') is ambiguous. As the HRP Response Overview (1 January - 31 December 2022) states: 'Expanded reach has been predominantly achieved through blanket distributions – such as soaps, aqua tabs and teaching and learning materials – [and with] activities such as awareness raising, counselling, explosive ordinance risk education, and hygiene promotion. For most Clusters, these activities constitute more than half of their total response reach.'⁷⁹ It follows from this that 'reach' figures must be interpreted with great care. Top line figures may be an aggregation of multiple forms of output, some of which are one-off or transitory in their effect. The evaluation suggests that depth of coverage among the most vulnerable groups (true 'reach') should be distinguished from breadth of overall coverage (or just 'coverage') against the total PiN category.⁸⁰ This issue of potentially misleading 'reach' figures is recognized and is being addressed within the ICCT, with Clusters revising their respective monitoring systems to distinguish direct from indirect beneficiaries.
123. Effectiveness and impact are difficult to measure. The challenge of gauging changes in outcome (actual, potential) faces all sectors, but few found a convincing answer to it. Many so-called 'outcome' indicators are output indicators. While there is value in monitoring and reporting against these, the evaluation found limited attempts to collect evidence of actual aid impact and a heavy reliance on programme logic and programme delivery against targets.⁸¹ Feedback mechanisms were not adequate to measure benefit as judged by aid recipients, although such mechanisms improved for the response overall during the evaluation period.
124. Finding 4A. The evaluation made several findings about the use and interpretation of performance indicators. This includes the ambiguous and potentially misleading use of 'reach' indicators, the tendency to confuse outputs with outcomes, and the heavy reliance on programme logic rather than real-world evidence of impact.

77. What is presented in this section is a summary of fuller analysis to be found in Annex E.

78. The analysis in this section is based largely on data compiled at national Cluster level, so it involves a level of generalisation that masks differences related to sub-national, demographic or agency-specific factors. The Whole of Afghanistan Assessment for 2022 notes that '*Exposure to, as well as impact of ... shocks, are felt across all population groups, suggesting similar levels of vulnerability. Yet, key differences observed between rural, urban and refugee populations highlight the need (for) a targeted response.*' (REACH WoAA Key Findings Presentation, ICCT, Kabul, 20 September 2022)

79. Afghanistan: Humanitarian Response Plan 2022 Response Overview (1 January - 31 December 2022) – UN OCHA, Feb. 2023

80. Although the metric for 'reach' in this sense may be harder to define, it forces the question of who is actually able to benefit from a given intervention – and whether it is reaching those most in need of assistance.

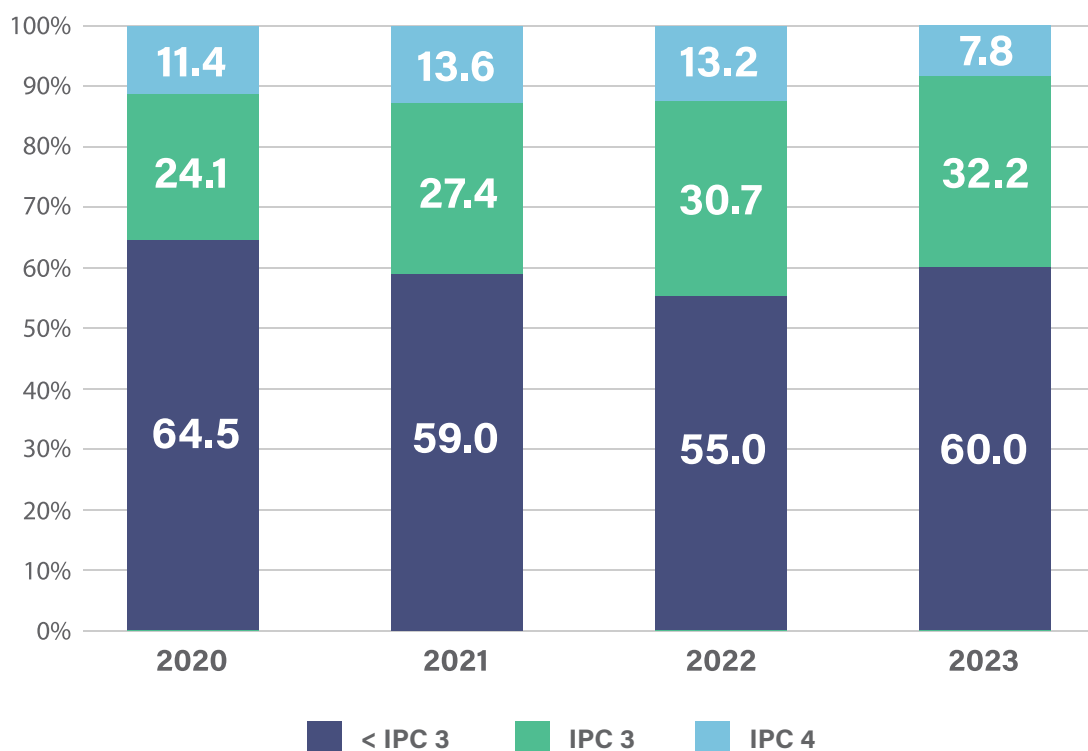
81. That it is possible to do more in this regard, particularly in establishing baselines against which to gauge progress and the impact of interventions, is shown by exercises like that undertaken by Norwegian Church Aid (NCA) Afghanistan's Integrated Community Resilience Action (ICRA) programme, funded by UNDP. Baseline Assessment of NCA Afghanistan's ICRA Program – Final Report, NCA: October 2022. This can be accessed at <https://download.acbar.org/files/files/9436908659.pdf>. More comprehensive in scope are the annual Whole of Afghanistan Assessments conducted by REACH, and the work of Ground Truth Solutions on aid perceptions.

The Food Security and Livelihoods response

125. By far, the largest single component of the response was mounted by agencies in the Food Security and Agriculture Cluster (FSAC). This accounted for around 40 per cent of the total humanitarian funding over the evaluation period (Figure 5) with WFP being by far the main direct recipient of funds (see Annex 1). Notably, FAO and the agriculture response received funding from both development and humanitarian sources at a much higher level than is usual in a humanitarian context – reflecting recognition of the critical need to support fragile farming and rural livelihoods.
126. With close to 9 million people in IPC level 4 in December 2021 – the worst such situation in the world – the outlook in late 2021 was so threatening that WFP declared a ‘risk of famine.’ Whether there was a risk of generalized famine is debatable; but pockets of IPC5 were found in Ghor province. Compound risk factors had escalated greatly and the situation was rightly judged potentially catastrophic. The IPC numbers have improved somewhat since the winter of August 2021 (see Figure 6), but they remain the fourth highest in the world according to the revised 2023 HRP. Extremely high levels of food insecurity persisted throughout the evaluation period.⁸²
127. The ambition until 2023 was to reach almost all those in categories IPC 3 and above, together with high-dependency vulnerable groups: returnees, IDPs, and victims of natural disaster. This was largely achieved, which – given the timeframe and scale of operations involved – is a remarkable achievement. However, the top-line numbers may not be entirely reliable and they conceal a mixed picture regarding benefits actually delivered, particularly for 2023.⁸³

Figure 6: IPC food security trends: relative proportions of <IPC3, IPC3 and IPC4 over time

Excludes IPC projection figures in averages and uncertain data on IPC 5. Data source: <https://www.ipcinfo.org>



82. The REACH Whole of Afghanistan Assessment for 2022 shows the seasonal variations in food consumption, but a particularly marked increase in hunger between 2021 and 2022. (WoAA Presentation, ICCT, Kabul, 20 September 2022)

83. As one Cluster member put it, “the high performance of 2021 and 2022 should be taken with a pinch of salt”. Another said ‘I don’t trust the historic data. There is a big problem of reporting, with (unintentional) inflation of figures and double counting of beneficiaries.’ These are legacy issues and FSAC is now ‘taking steps to do a ‘reality check’ on the figures.’

128. The scale of funding and response in the food security and livelihoods sectors reflects the seriousness of the food security situation, which is itself an indication of the extreme pressures on the household economy. Part of the function of food assistance (food, cash and vouchers) was to relieve some of that pressure.⁸⁴ With regard to livelihoods, the situation has remained critical throughout the period. Although the rural economy, harvest prospects and the drought situation improved to near average in 2023, the deficit left by years of under-production remains, along with high levels of indebtedness and much-reduced opportunities for casual labour and other income sources. One result is a rise in damaging coping mechanisms.⁸⁵

Drought is not the only natural hazard facing farmers. "Our agriculture fields are destroyed by flood and our animals are killed by natural disasters. We take our animals to the mountains for pasture during the summer. Last year unexpectedly, the weather got cold, and there was snow, and we lost around 200 animals in the mountains... Now, very few people are busy with animal husbandry", community member.

In 2023, a major outbreak of locust in northern Afghanistan threatened to 'destroy a quarter of this year's wheat harvest,' with the potential for even worse in 2024 (WFP Situation Report 25 June 2023).

129. In 2023, while the PiN figure for FSAC remains high, more recent shortfalls in available funding led to a *scale-down of food assistance*, with reductions in targets and a change in targeting strategy (see below). From April 2023, there was a reduction both in the coverage of assistance and the amount of assistance provided, with the numbers assisted reducing from 13 million to 9 million (a drop of 30 per cent) and the food ration cut from 75 per cent to 50 per cent. Following these cuts, WFP reported it was forced to drop another 2 million hungry people from food assistance in September.

130. The overall logic of providing large-scale food assistance – rather than a more targeted approach – was compelling over the evaluation period, given the IPC analysis and the known economic stresses at household level. As food markets recovered in the aftermath of the August 2021 transition, the challenge for many was (and remains) food affordability and the income to pay for food and other necessities.⁸⁶ With the collapse of casual labour markets, large-scale urban unemployment, and high levels of indebtedness, the household economy has come under enormous strain across the country. With respect to livelihood and agricultural support, the logic of intervention has combined *relief* and *resilience* elements: boosting income in the short term while building the resilience of food production and marketing systems.

131. The scale-down of general food distributions in 2023 brought about two **major shifts in balance** in terms of targeting. First, assistance was limited to those in IPC4 and vulnerable groups. As one UN staffer put it: '*We cover IPC4 plus as much of IPC3 as we think we can afford... [providing] a very basic safety net for those who really have no means of coping.*' The second major shift concerns the rural-urban balance. The June revision of the 2023 HRP shows a re-focus on urban populations: 12.3 million planned direct urban beneficiaries against 3.4 million rural beneficiaries. This appears to align with needs assessment data, although assessing different vulnerabilities in rural and urban/peri-urban settings was a challenge for the FSAC. This uncertainty about comparative vulnerabilities in urban and rural contexts reflects a more general 'diagnostic' challenge for the FSAC response concerning the ways in which households in different categories are coping with economic stress and the role played by aid in this sector.

84. According to data gathered by REACH in 2022, household food expenditure increased from 65% of the household budget (5077 AFN) in 2021 to 73% (4573 AFN) by the middle of 2022. REACH "Whole of Afghanistan Assessment 2022: Key findings Presentation, Inter-Cluster Coordination Team, September 2022", PDF report accessed on 22.07.2023.

85. See for examples the Community Consultation report, Annex D

86. The revised 2023 HRP (p.9) reports that 'people spend three quarters of their income on food, trading off their other basic needs,' which if accurate reinforces the urgent priority of relieving pressure on household budgets.

132. Finding 4B. The dramatic increase in the scale of the FSAC response post-August 2021 was justified by the context and the increased risk reflected in the numbers assessed to be in IPC3 and particularly IPC4. The Cluster did well meeting the ambitious targets from September 2021 to the end of 2022 and reports that it mostly met or slightly exceeded them. From March 2023, the food assistance component lagged assessed needs by an increasingly wide margin.
133. Finding 4C. The evaluation found the rationale for both large-scale food assistance and scaled-up livelihoods and agricultural support compelling over the evaluation period. The combination of these two components at scale has been essential to helping households meet immediate needs and providing a livelihoods 'bridge' for farmers. In the medium to longer term, rural and urban livelihoods depend on deeper investment, the recovery of labour and other markets, and the growth of other potential income sources. The current aid model does little to address this, with assistance increasingly focused on a 'relief' rationale rather than a preventive or resilience-oriented one.
134. Food assistance is routinely described in the HRPs as 'lifesaving'. The evaluation found too little evidence to support this assertion: it depends on assumptions at household level that do not appear to be validated. Nor did it find data-based evidence to demonstrate the impact of the cuts made to the scale and coverage of assistance provided. Nonetheless, the evaluation found the logic of intervention combined with indirect evidence – including positive trends in the IPC data (Fig 6) – compelling. Food assistance in its various forms has been one of the few lifelines available to people during the crisis, taking pressure off household economies under extreme stress, as well as having wider market-related and macro-economic benefits.
135. With regard to the choice of food-in-kind vs. cash or vouchers, the evaluation suggests that greater use of cash could have increased the benefit delivered to vulnerable families during the evaluation period.⁸⁷ The relative efficiency of this modality is a factor here, and the evaluation notes the very high cost of delivery of in-kind assistance in the scaled-up response based on related budget figures.⁸⁸
136. Finding 4D. Given the known risk factors surrounding food and livelihood insecurity and the logic of intervention, the evaluation concludes that **scaled-up food and livelihood assistance played a crucial role in enabling millions of vulnerable Afghans to endure the crisis over the evaluation period.** This is based on assessing direct and indirect benefit delivered, and reduction of key risk factors relating to food access. The extent to which interventions in this sector were 'lifesaving' is uncertain, although the IPC data from the early part of the evaluation suggests that lives would certainly have been lost without such intervention. Similarly, too little is understood of the household economy to be confident of defining with any precision the role played by that assistance in enabling households to survive.

The Health response

137. Before August 2021, the health system in Afghanistan centred around the 'Sehatmandi Project', funded mainly through the World Bank's ARTF, under which health services were contracted out through NGOs. This contributed to several improvements in the health status of the Afghan population, including dramatic falls in new-born and under 5-year-old mortality rates.⁸⁹ However, the

87. The shift in the ratio of in-kind food to cash-based transfers (cash/vouchers) from approximately 80:20 to 70:30 between 2021 and 2022 shows progress in this direction. Source: HRP Monitoring Reports 2021, 2022.

88. Economies of scale meant that the associated costs of delivery reduced significantly as a percentage of total costs over this period, while the WFP charge for indirect costs remained at a fixed percentage throughout.

89. Under-5 mortality rate decreased from 191 to 50 per 1,000 live births between 2006 to 2018; the new-born mortality rate fell from 53 to 23 per 1,000 live births from 2003 to 2018. Source: "Delivering Strong and Sustainable Health Gains in Afghanistan: the Sehatmandi Project." Results brief 23 October 2020. The World Bank. <https://www.worldbank.org/en/results/2020/10/23/delivering-strong-and-sustainable-health-gains-in-afghanistan-the-sehatmandi-project>

Project had coverage limits (particularly in Taliban-controlled areas) and was affected by structural, management, and corruption problems. A health system that was already fragile became even more so after August 2021 as demand increased, skilled capacity was lost, and funding became more restricted. The imperative of preventing the collapse of the health system led to urgent discussions between donors and implementing agencies. It took some months to identify new funding arrangements, following which the Project was effectively re-launched as the 'Health Emergency Response' (HER), part of the broader 'basic needs' initiative.

138. In light of the deteriorating situation and the increased access to previously hard-to-reach areas, the HRP-related health response – designed to complement the HER - increased in scope and coverage. The PiN number increased from 1.9 million in 2019 to 18.1 million in 2022, and the target number from 1.5 million to 14.7 million, reflecting a significant growth in demand for and access to health services. The Health Cluster target increased from 1.5 million to 14.7 million over that period. Out of approximately 4,400 health facilities in the country, around 2,300 are supported by the HER Project. Humanitarian partners support 1,000-1,200 facilities, through mobile teams covering under-served areas.
139. With the increase in access to previously neglected areas came an increase in the numbers of people left vulnerable by the financial and livelihood crisis and who were unable to cover the costs of private medical assistance or transport to public health facilities. The overall escalation of people in need meant that scale-up of the humanitarian response in the health sector was essential.

Economic barriers to accessing health care have become increasingly pressing for many, often demanding considerable sacrifice by family members. "I have a one-year-old child, and he has been sick since he was born. His medication costs 500 to 1000 AFS every month... I try to stay hungry myself, but I will definitely purchase my child's medicine for him". "Whenever any of our family members get ill, we take them to Herat province because there is no good doctor found here. We rent a taxi car and transfer our patient to Herat city; the taxi fare is approximately 700 to 800 AFN, it is a 5-hour drive to Herat province."

Quotes taken from Community Consultation report – See Annex

140. Although there are still glitches in the complementarity between the HER Project and the humanitarian response and coverage remains inadequate, the evaluation concluded that the overall humanitarian rationale for complementing the HER was sound. However, the limits and weaknesses of the latter obliged the Cluster to over-expand the humanitarian agenda into areas and domains beyond humanitarian capacities. The current decrease in financial resources threatens to have significant adverse consequences.
141. In terms of health risk factors and vulnerability, the situation remains precarious. The number of healthcare workers (9 for 10,000 people) is well below the recommended 23 per 10,000 people, while coverage is below standards: one in two children is not vaccinated and less than two-thirds of births are supported by a skilled attendant.
142. Based on the review of the HRP figures and of key indicators – particularly the numbers of primary health care (PHC) consultations conducted – the Health Cluster performed relatively well in 2021 and 2022 (hitting 79 per cent and 90 per cent of target respectively).⁹⁰ Several practitioners expressed the view that the absence of major outbreaks confirms the effectiveness of the response

90. Note however that these figures reflect consultations rather than beneficiaries and are inflated by the way these are counted – a patient can have more than one consultation.

regarding infectious diseases. The other key indicator tracked for the Cluster performance is the number of people treated for physical trauma. Coverage and achievement under this programme component expanded dramatically in 2022, reflecting the increase in access and coverage.

143. One area of concern is an apparent crisis in general mental health (anxiety and depression). While this issue existed before the change of leadership, it appears that the current livelihood crisis and the restrictions imposed by the Taliban have dramatically increased its magnitude. The evaluators were unable to find reliable data on this issue. It appears that needs far outstrip capacities in both diagnosis and treatment in this area.
144. Finding 4E. The fragility of the health system, together with high levels of health risk, decreasing humanitarian resources and limited bilateral/development funding, raises serious concerns for the sustainability and possible further deterioration of the situation. The evaluation finds that the combined humanitarian and basic needs (HER) response played an essential role in reducing public health risk (e.g., through vaccination and risk communication) and providing access to healthcare. The health system, however, remains critically vulnerable.

The Nutrition response

145. Even before the Taliban take-over, Afghanistan had some of the highest levels of malnutrition in the world, both acute and chronic.⁹¹ At that time, the main challenges were humanitarian access to non-government-controlled areas and the limited capacity of health systems on which the nutrition programme relies heavily. The sheer scale of the crisis was too great for the resources available through the HRP, although reliable nutrition data from this period is scarce. As a consequence of improved access to previously hard-to-reach areas and the availability of funds, the Cluster expanded nutrition service delivery through static and outreach facilities integrated into the health system. The number of mobile health and nutrition teams (MHNT) deployed to remote areas not covered by the HER Project or other static health facilities increased. The PiN figures for nutrition increased from 2.1 million in 2019 to 7.8 million in 2022, and targets from 1 million to 5.9 million. The Nutrition Cluster nearly doubled its response capacity between the end of 2021 and 2022.
146. The Nutrition Cluster took the ambitious decision in 2023 to target 100 per cent of SAM and 70 per cent of MAM cases. However, the expansion of these two complementary interventions did not happen at the same pace. UNICEF strengthened and increased the number of SAM treatment facilities (mobile and static) relatively quickly thanks to the increase in financial resources in 2021 and 2022. WFP struggled to expand its MAM response at the same pace, and there were some delays.⁹² According to HRP figures, the Nutrition programme performed successfully in reaching targeted beneficiaries. Informants from the Nutrition Cluster suggested that targets set in 2021 and 2022 were probably not sufficiently ambitious.
147. The scale-up of the nutrition response matched the increase in assessed levels of acute malnutrition. Given the high numbers of SAM, MAM and PLW cases enrolled and treated, the evaluators concluded that the programme was effective based on reported data and the programme logic. However, this conclusion must be qualified: results are difficult to quantify, information on the rate of drop-out and re-enrolment is limited, and the more general trends in acute malnutrition are not evidenced well enough through surveys.⁹³

91. Afghanistan Nutrition Cluster - 2020 Annual Report. The report notes that *'the most recent nutrition surveys show that 26 out of 34 provinces are above the emergency threshold for acute malnutrition.'*

92. Reflecting the very strong collaboration between the two agencies – noted by many informants – UNICEF agreed to cover part of the MAM requirements with RUTF (normally used for SAM therapy) for several months.

93. A new SMART survey was originally planned for 2023 but will be postponed till 2024 due to lack of capacity to conduct it.

148. Decreases in funding pose a problem for the Nutrition sector. While UNICEF should be able to cover SAM needs till the end of 2023, the situation for 2024 is concerning. For MAM and PLW interventions, WFP faced a drastic reduction of resources since the beginning of 2023.⁹⁴ As noted above, uncertainty concerning the health sector funding makes the current nutrition service provision model uncertain. Among other risk factors, the Taliban's edict on girls' secondary and tertiary education could have a significant adverse effect on the nutrition programme.
149. Finding 4F. The strategy to expand the scope and outreach of the nutrition programme matched the changed circumstances and greatly benefited from the post-August 2021 increase in funding. The Nutrition response is primarily based on health system structures and so is dependent on the latter's strengths and weaknesses. Risks associated with decreasing funding affect both sectors.

The WASH response

150. Water and sanitation infrastructure has historically been underdeveloped in Afghanistan. Despite years of investment, decades of conflict and recurrent natural disasters inflicted damage on the limited WASH infrastructure that was in place across Afghanistan. As a result, the proportion of the Afghan population with access to safe drinking water was among the lowest in the world.⁹⁵ The effects of recent droughts were especially felt at the rural level, with 73 per cent of households affected, compared with 24 per cent of urban households. The proportion of households experiencing barriers to accessing water increased from 48 per cent in 2021 to 67 per cent in 2023.⁹⁶
151. Until 2021, the WASH humanitarian response was relatively small, and the focus of the Cluster was on rural interventions and on IDPs who concentrated in peri-urban areas. Development interventions were largely implemented with and through the Ministry of Rural Rehabilitation and Development (MRRD).⁹⁷ This context changed dramatically with the regime change and suspension of development funding. Much of the technical staff capacity was lost, and WASH needs in urban areas increased dramatically due to a lack of supplies and maintenance.⁹⁸ WASH institutional management saw a near collapse and the water supply system could not meet the demand for 80 per cent of its urban population. Lack of basic supplies and technical capacity hampered operational capacity in major urban areas like Kabul, Kandahar, and Mazar-e-Sharif.⁹⁹ The Cluster's operational model was reshaped around evolving priorities (different for urban/peri-urban and rural contexts): provision of safe drinking water, hygiene promotion and sanitation.

Depending on location, families face different levels of challenge in accessing clean water. "We get our water from the hand pump located at the end of our alley. We used to have drinking water wells in our houses. But the water in the well dried up last year, and we are currently facing a water shortage." "We use water from the river. It is a one-kilometre way, and women and children carry water on their backs. These waters are of poor quality." [Community consultations for the IAHE]. In Ghazni and Nuristan Provinces, informants told us that they use canal water for drinking, despite knowing the risks. In urban areas, lack of money to purchase water is a major constraint on access.

94. WFP informed the evaluators that they had enough supplies to continue at least the BPSF programme till the end of 2023.

95. i) Afghanistan WASH Cluster Strategy and Operation Plan HRP 2018-2019. April 2018. ii) HNO 2021

96. Communication from WASH Cluster in response to first draft IAHE report. Urban households in particular are reported to have increased their monthly expenditure on water from 185 AFN in 2021 to 317 AFN in 2023 per month.

97. MRRD received around 80% of UNICEF's WASH budget for development interventions, largely at urban level.

98. Estimations indicate that in Kabul ~40% of households used to have piped water at house level but went down to 23/27% in the second half of 2021.

99. HNO 2022

152. The WASH Cluster met its targets in 2021 and in 2022 (82 per cent and 106 per cent of targeted beneficiaries reached, respectively), following an expansion of its programme and the doubling of its target.¹⁰⁰ However, achievement overestimations (e.g., based on NFI distribution or awareness campaigns) were acknowledged by WASH specialists. Crucially, the suspension of development funding and donors' reluctance to support the essential hardware component of the humanitarian response ("Any infrastructure is considered an asset benefiting the Taliban" – Cluster respondent) are seriously hampering the implementation of a sound WASH programme.
153. Finding 4G. The evaluation shares the perception of many WASH practitioners interviewed that the WASH crisis is a development crisis. The symptoms of this crisis are humanitarian, but without a return of large-scale development interventions, the work of the Cluster can only mitigate the risks. Cluster members were largely prevented by their main donors from carrying out necessary system-related and infrastructural interventions, and the WASH Cluster has been seriously underfunded.

The Emergency Shelter and Non-Food Item response

154. Internal and external displacement and migration has been one of the defining features of the Afghan context over the past 40 years. This is related to conflict, economic factors and the impact of natural hazards. The need for support for the victims of these hazards – IDPs, returnees, refugees and victims of natural disasters – has formed the core of interventions by the Emergency Shelter and Non-Food Item Cluster, the scale of which has progressively increased since 2012. The Cluster has also been the primary responder for the 'winterization' programme, helping Afghans most exposed to freezing winter conditions survive. As with other sectors, the overall number of potential beneficiaries increased following the fall of the previous government. However, given the reduction in conflict-induced displacements, the better security situation and increased access, the Cluster has aimed to expand the 'transitional shelter' component of its strategy for IDPs who have returned to their areas of origin and those in informal settlements.
155. The Cluster progressively shifted its focus to a new beneficiary category: 'vulnerable people with humanitarian needs'. This number gradually increased to nearly 1.7 million in 2022, eventually including long-term, protracted IDPs and host communities. Among these are the beneficiaries of the 'transitional shelter' interventions. However, there has been a persistent disconnect between large PiN figures and relatively small target numbers for the response.¹⁰¹ Informants attribute this to poor funding for the Cluster, the limited presence and capacity of implementing partners, and the decision by Cluster members and leading agencies (UNHCR and IOM) to be 'honest' about PiN figures and realistic about targets.
156. The shelter response has comprised three main modes of intervention: (i) emergency shelter for acute needs (cash for rent or emergency shelter kit); (ii) support to repair or upgrade existing shelters that are damaged or unfinished; and (iii) transitional shelter covering the needs of vulnerable families in protracted situations who have some security of tenure. The shift to the more sustainable 'transitional shelter' approach is perceived by most practitioners as a step in the right direction, pending more permanent housing solutions. However, donors have been reluctant to fund it consistently since this approach is much more costly and requires technical expertise. As a result, it represents only a marginal component of the ES-NFI programme in terms of PiN and target numbers and has underperformed in target achievement.
157. The evaluation found several inconsistencies in its analysis of the performance of the ES-NFI Cluster programme. While the HRP figures indicate good overall results of beneficiaries reached in

100. HRP 2022, 2023

101. The ratio of target numbers to PiN since 2021 have been: 17% (2021); 18% (2022), and 13% (2023).

2021 (97 per cent) and 2022 (105 per cent), a more in-depth review of the various elements of the response gives a different picture. Only the winterization and NFI distribution components indicate performance between 50 per cent to 100 per cent, while the others underperformed consistently. The discrepancies seem to be linked to different categories of beneficiaries being double-counted. Cluster staff acknowledged that achieved target numbers were skewed by the cheaper interventions, namely NFI distribution and winterization.

158. Finding 4H. Overall target achievement in the sector is somewhat skewed by the results from essential NFI and winterization interventions. Progress on the shelter component is limited, reflecting the inadequate funding available for anything other than emergency and repair interventions. The ‘transitional shelter’ package represents the most sustainable component of the ES-NFI programme. In Afghanistan’s harsh winter and summer climates, it is preferable to emergency shelter, but funding this approach at scale would require greater support from development funding streams.

The Protection response

159. Although the overall security picture in Afghanistan improved with the ending of the conflict, the protection situation for many vulnerable groups deteriorated during 2022 and 2023. The Taliban imposed increasingly restrictive limits on the freedoms of women and girls, and the economic situation led households to adopt coping strategies that are particularly damaging to children. Many protection threats facing vulnerable Afghans are matters of policy and law or practices that are socially or culturally embedded (see Box 4 below), exacerbated by the prevailing crisis. Much of the protection response is concerned with mitigating the after-effects of abuses rather than the prevention of abuse, which typically requires institutional, cultural and behavioural change on a large scale – and depends on a favourable policy and legal environment. That environment does not currently exist in Afghanistan.
160. Over the evaluation period, there has been a surge in the numbers assessed as needing protection assistance. Between 2018 and 2021, the number stood at 12.8 million. By 2022, this had risen to 16.2 million and escalated to 20.3 million in 2023. National policy changes are the main driver of this increase, particularly the restrictive policies imposed by the Taliban curtailing the freedoms of women and girls, which in turn has increased exposure to gender-based violence.¹⁰² The protection of children is of primary concern in this context, particularly concerning child labour and early marriage. The collapse of social service systems and the closure of almost all orphanages have exacerbated the situation. Other elements of the state apparatus for protection are also severely weakened. As the Operational Peer Review report in May 2022 noted ‘Almost all of the pathways that existed to address protection issues such as police family response units, courts, social services, and women’s support services – have been closed down. Issues such as gender-based violence can no longer be addressed directly... and there is widespread fear to report... protection incident[s].’¹⁰³
161. Even before August 2021, Afghanistan faced significant land ownership and property rights challenges, resulting in tenure insecurity across the country. The regime change has further intensified these uncertainties. Since the Taliban assumed control, there have been reports of forced evictions, with households expelled from informal settlements.¹⁰⁴ Forced evictions have not only disrupted lives but have raised concerns about access to essential services.

102. No recent data for this are available because data collection is not possible in the current environment. But with women restricted to the home, households struggling economically and the collapse of legal and protective mechanisms, there is a very strong assumption that violence has increased.

103. Afghanistan: Operational Peer Review, Mission Report, 13.06.22 (unpublished)

104. NRC (2023). Afghanistan: Taliban authorities violently evict displaced people from makeshift camps in Kabul. Available at: <https://www.nrc.no/news/2023/july/afghanistan-taliban-authorities-violently-evict-displaced-people-from-makeshift-camps-in-kabul/>

162. Some of those consulted for the evaluation describe the ongoing crisis in Afghanistan as primarily a 'protection crisis' in which individuals, communities and whole demographic groups face threats to their safety, dignity, and overall well-being through the denial of rights. This raises questions about how the humanitarian and human rights agendas overlap, how the 'protection crisis' relates to the prevailing humanitarian crisis, and how to resolve related questions of principle and engagement. The failure to resolve those questions in practice led to a protracted debate in the HCT, particularly between the more 'normative' agencies (focused on rights issues and policy advocacy) and those more operational agencies whose remit was more directly humanitarian. The result was a stalemate in the HCT over questions of principle and engagement with the authorities.

Elements of the protection response

163. Within the broader humanitarian response, the protection response differs in encompassing multiple sub-agendas covered by different sub-Clusters or areas of responsibility. Coverage and effectiveness issues are particularly difficult to quantify (or even to define) in this sector. The restrictive operating and policy environment relating to *coverage* and the nature of the threats involved means that the response has not been – and probably could not be – proportionate to the protection needs of vulnerable groups in Afghanistan.¹⁰⁵ The *effectiveness* of the response has varied from sector to sector for many of the same reasons.

164. Multiple gaps exist in protection-related evidence and data concerning specific protection threats and the impact of related interventions. The quality of monitoring and evaluation systems within the response is inadequate for the Cluster, while the lack of a unifying strategy and outcome-level indicators is a serious weakness. Despite this, available evidence for at least some components of the response (notably Housing, Land, and Property and Mine Action) is sufficient to show real impact in the areas of intervention. The (HLP) sub-Cluster is a positive example of what can be done to establish mechanisms for collecting outcome-level data. In Child Protection, UNICEF has been able to do some ex-post analysis to show the impact of emergency interventions.¹⁰⁶

165. Each of the sub-agendas within the protection Cluster has had to adapt to the very difficult operating environment described above. This has led, for example, to the suspension of certain activities related to **gender-based violence** (GBV) and the closure of several child protection centres due to a lack of acceptance and support from the de facto authorities. The focus of the child protection sub-Cluster before the Taliban takeover revolved mainly around system strengthening and the establishment of a social workforce. The sub-Cluster has since shifted the focus towards providing services related to mental, psycho-social, and health support; and strengthening case management.

166. There has been some limited collaboration on the child protection agenda with the DfA, particularly with the Ministry of Justice and Internal Affairs. **Mine action** is a relatively less sensitive agenda for the de facto authorities, and informants state that disruptions here are primarily a result of donor conditionalities that limit collaboration with the Directorate of Mine Action Coordination (DMAC). In **Housing, Land, and Property**, the sub-Cluster encountered fewer restrictions imposed by the de facto authorities. Evidence collected by the sub-Cluster indicates good progress in enabling beneficiaries to claim their rights through a combination of legal advice, training, sensitization, and advocacy efforts.¹⁰⁷ Even before the collapse of the Republic, the Taliban acknowledged the validity

105. With regard to gaps in the protection response, the UNCHR L3 evaluation reports that: '...UNHCR was inconsistent in providing protection support across regions and over time... important issues related to gender equity and gender-based violence (including PSEA) were not all addressed. UNHCR also struggled to ensure sufficient coordination capacity in the Protection Cluster and CCCM Working Group.'

106. Analysis of REACH and UNICEF programme data suggests that 'Households in districts that received UNICEF CPIE assistance have a 13% lower chance of having school-aged children engaged in child labor.' UNICEF L3 Evaluation <https://www.unicef.org/evaluation/reports#/detail/18938/evaluation-of-the-unicef-l3-response-in-afghanistan>

107. According to data gathered by the HLP sub-Cluster, in 2022 approximately 60% of male beneficiaries and 40% of female beneficiaries have successfully asserted their rights as a direct consequence of these interventions.

of land titles issued by the previous government in the areas under their control. However, the short-term nature of humanitarian assistance and the restrictions imposed on water supply systems continue to present ongoing challenges for the effective delivery of HLP assistance.

167. The evaluation found that **protection mainstreaming**, rather than being recognized as a collective responsibility of the entire humanitarian system, was predominantly perceived as a sectoral activity. This seems to relate partly to the slow implementation of adequate Accountability to Affected People (AAP) mechanisms and related cross-referral of protection cases arising during consultation and feedback. Issues like access negotiation were treated as operational matters related to aid delivery, as were questions of access by vulnerable groups to aid when their protection dimensions should have been more clearly recognized. The integration of protection into the broader response remains weak. The 2022 Operational Peer review¹⁰⁸ suggested there should be more integrated humanitarian services and multisectoral approaches, in part to facilitate the protection response. The evaluation found that much still remains to be done in this regard and it echoes the OPR's call for stronger integration.
168. Finding 4I. The overall protection agenda has been heavily constrained by the policy environment in Afghanistan. In some cases, particularly relating to gender and human rights, DfA policy is the cause of the protection issues. In other cases, the institutional and political climate is not conducive to progressing issues such as GBV and child protection. Progress has been possible in some areas – notably mine action and HLP – partly because of the relatively apolitical nature of the agendas concerned.
169. The evaluation found the lack of a unifying Protection strategy made it harder to make connections between the sub-components of the protection agenda and ensure protection mainstreaming. It also made it difficult to understand and communicate the relationship between the humanitarian and human rights agendas. Since this was one of the defining issues for the response as a whole, the gap is particularly significant. The Protection Cluster needs to find clearer ways of articulating and communicating the protection agenda.

BOX 5. Framing the protection agenda

The evaluation found the overall protection agenda was poorly conceptualized and difficult for those working in the humanitarian field to understand. Work is needed to remedy this, not least to enable more effective communication and collective action around protection. This evaluation suggests the need to distinguish four main sources of protection concern:

- A. **Policy threats** limiting rights and freedoms to act (**'freedom to'**), in particular those related to the edicts limiting the rights of women and girls to work, education, free movement and association, etc.
- B. **Behavioural and environmental threats** to physical and mental security (**'freedom from'**) including threats of violence (GBV, VAC, etc.), threats from remnants of war (UXO, landmines, etc.), threats of exploitation and coercion (child labour, child marriage, PSEA, etc.).
- C. **Threats to right to life and health** from **deprivation of the means of subsistence** and denial of access to services (including denial of access to aid and aid diversion).
- D. **Threats to legal entitlements**, access to justice, status recognition, security of property and land tenure (HLP rights).

These interrelated and overlapping categories allow for analysis of different agendas of concern and the links between those agendas. These include threats directly associated with the humanitarian agenda (2 and 3 above) and others (1 & 4) which may have less direct but still potentially serious humanitarian implications. The ban on female aid workers and the ban on girls' secondary and tertiary education fall into this latter category. So too does the widespread lack of security of land tenure. Freedom from fear cuts across all categories, as do issues related to forced displacement.

108. Afghanistan: Operational Peer Review, Mission Report, 13.06.22 (unpublished)

170. Finding 4J. **The protection response lacks a unifying strategy.** While the evaluation found many of the component elements of the protection response to be cogent and focused (albeit with limited reach and scope), the protection agenda in Afghanistan lacks a coherent framing – as well as a strategy – and to be poorly understood across the humanitarian system. The evaluation proposes one way in which this might be approached (see Box 5).
171. Finding 4K. Protection has predominantly been perceived as a sectoral activity rather than as the collective responsibility of the entire system. The protection implications of programme and funding decisions may be masked as a result. The integration of protection analysis into the response – as demanded by the ‘centrality of protection’ principle – remains weak and must be strengthened.

The Education response

172. The Taliban’s takeover dramatically altered Afghanistan’s education landscape. Despite the gains made since 2001, much of that progress – particularly in girls’ secondary education – has been reversed. While the Education Cluster has tried to adapt, the sector’s challenges are structural and policy-related. They go well beyond the capacity of the humanitarian system to address. This sector feels the lack of an ongoing development agenda particularly acutely. Ensuring access to education for all children, especially secondary school-aged girls, remains a formidable challenge and one on which there has been minimal demonstrable impact. Despite essential work on girls’ primary education and the recruitment and training of female teachers, education – and particularly access to education – is the area of the response where the least progress was possible.
173. The most serious challenge is in education policy: the Taliban edicts prevent girls from accessing secondary and tertiary education. An estimated 1.1 million secondary school-aged girls are currently unable to continue their education due to this restriction. This deprivation not only denies girls their right to education but also hinders their potential to actively participate in the nation’s social and economic development, with long-term implications for gender equality. The most recent decree (June 2023) prohibiting international NGOs from directly delivering community-based education has further complicated the situation, potentially leaving more children without access to any form of schooling. The restrictions on female staff working for NGOs and the United Nations have further compounded these challenges. Despite partial exemptions for female teachers, only around a third of female monitors have been able to perform their work effectively.
174. The extraordinary figures for children assessed to be in need (PiN) of Education in Emergency (EiE) assistance – 7.9 million in 2022 and 8.7 million in 2023 – reflect the severity of the education crisis in the country. The decision to propose an even higher PiN in 2023 reflects persistent concerns regarding the accessibility and quality of education for millions of children and young people.¹⁰⁹ The education crisis extends beyond gender disparities and the figure of 8.7 million represents a significant proportion of the school-age population in the country. The planned reach in the HRP 2023 is to support 1.6 million boys and 1.5 million girls, which illustrates this mandate and concern.
175. Defining the education ‘crisis’ is not a simple as it is deeply rooted in structural causes. During the formulation of the HRP 2022 and the HRP 2023, there were complex discussions about the classification of the education crisis. As one Cluster informant described, “There was a lot of debate on what should go in the HRP... Was this an emergency? Should we focus on those most in need or the whole population?”

109. One significant factor contributing to the high PiN is the livelihoods and food security crisis, which is hindering children’s ability to attend school as families struggle to meet their basic needs.

The dramatic rise in child labour over the course of the past two years (Gender in Humanitarian Action, 2022), as well as being a protection concern its own right, has had clear negative impacts on education:

“Unfortunately, my own children attended school only till the third and fourth grades. The reason they dropped out of school was their involvement in manual labour as we were unable to afford the expenses of their essentials like notebooks, pencils, etc.,” community member.

176. Since the Taliban takeover, the increasingly restrictive environment has made it difficult for the Cluster to devise a comprehensive strategy to address the education crisis. Most of the support has been delivered through temporary learning spaces and community-based education initiatives, which witnessed significant expansion over the past two years. One critical focus is on reaching secondary school-aged girls deprived of access to schools. In response, the Cluster explored the possibility of implementing alternative learning modalities, such as radio and TV programs, to facilitate distance education. Various obstacles and sensitivities surrounding these programmes prevented them from being implemented as planned.
177. Overall coverage of need in the education sector fell far short of ambition: it only reached 37 per cent of the target set out in the HRP 2022.¹¹⁰ This substantial gap can be attributed to the bans and restrictions imposed by the de facto authorities. Beyond the policy issues noted above, the lack of adequate infrastructure, teacher shortages, and lack of training, all require sustained effort and long-term planning that extend beyond the scope of emergency response.
178. Given the lack of educational outcome data and the scarcity of relevant data on indicators like attendance, the evaluation cannot draw any firm conclusions about the overall impact of the education response. The indicators used for monitoring and evaluation in the education sector remained focused on output delivery and ‘reach’ since the scale-up in 2021. While important, such indicators do not capture the impact of those interventions on the lives of beneficiaries. The proposed outcome indicator in the Humanitarian Response Plan 2023, which measures the number of boys and girls reached through community-based education initiatives, should be seen as an output indicator. Genuine outcome indicators might include reduced drop-out rates, improved learning outcomes, and enhanced well-being of the beneficiaries, when linked to Mental Health and Psychosocial Support (MHPSS) or cash assistance interventions.¹¹¹ One area where there is potential to strengthen existing metrics is the nexus between education and child protection.
179. Finding 4L. The Education in Emergency response is dwarfed by the scale of need and constrained in its ability to address the main challenges to access. The overwhelmingly adverse impact of keeping girls out of secondary school and university is the dominant concern, but lack of access to quality education is a more general problem. As with WASH, the education aspects of the crisis cannot easily be framed in standard humanitarian or ‘emergency’ terms except at the margins.

Cluster and Inter-Cluster Coordination

180. The Cluster coordination structure before August 2021 was centralized at the Kabul level. There was limited presence in the regions, and this was generally based on double- or triple-hatting arrangements – that is, with coordinators playing agency/programme and Cluster coordination roles. Following the events of August 2021 and the increase in access and needs, Clusters had to

¹¹⁰. As recorded in the 2023 HRP

¹¹¹. There has been some recent progress on this. For example, one of the output indicators in the HRP 2023 assesses the number of boys and girls continuing with their studies during winter, in an effort to measure continuity of education in challenging conditions. But more emphasis on genuine outcome indicators is needed.

manage a dramatically scaled-up response within a very different operating environment. Assisted by their respective Global Clusters, there was a drive to strengthen the coordination structures at the Kabul level and activate those at a regional level, thus drastically reducing double hatting. By May 2023, coordination structures were in place for all Clusters in most regions. Recruitment processes were ongoing (it has reportedly proven challenging to find suitably qualified candidates), and double-hatting arrangements were still in place in numerous locations.

181. The evaluation shares the concern raised by several interlocutors that the ongoing dramatic decrease of humanitarian financial resources will directly affect the efficiency and effectiveness of the coordination work done by the Clusters.
182. The number of organizations participating in Clusters increased dramatically after August 2021,¹¹² although not all NGO applications for membership were approved, and some were only granted observer status.¹¹³ Before August 2021, cluster coordination meetings had often involved the participation of line ministry representatives, sometimes with co-coordination responsibilities. Following the leadership change, while some Clusters (Health, WASH) thought it important to keep interacting and engaging with ministerial counterparts, other members felt uncomfortable discussing sensitive topics in the presence of DfA officials, as they were concerned confidentiality would be affected. In May 2022, the HCT recommended the cessation of all Cluster collaboration with governmental counterparts.¹¹⁴
183. The performance of individual clusters was mixed. The evaluation found intra-cluster coordination was effective overall (Protection was one exception),. Analysis of the yearly self-assessment Cluster Coordination Performance Monitoring (CCPM) results suggests high levels of member satisfaction. Inter-cluster coordination was more mixed, partly because of external factors. For example, the traditional collaboration between WASH/Education and WASH/Health was directly affected by the WASH Cluster's lack of funding for infrastructure interventions. Nutrition and Health have had a symbiotic and largely effective relationship. Coordination between the FSAC and Nutrition Clusters was initially considered weak but has progressively improved, particularly after discussion and agreement between WFP and UNICEF around interventions like SAM and MAM management. This allowed for the organization of the first IPC Acute Malnutrition Analysis survey in 2022.
184. According to several interviewees, the best example of inter-Cluster coordination has been around the winterization programme, under the leadership of the ES-NFI Cluster, and involving (to varying degrees) most of the other Clusters in both planning and implementation. Elsewhere, coordination between pairs of Clusters or agencies is the dominant form of inter-Cluster coordination.
185. One important area of inter-Cluster coordination concerns the use of Cash and Voucher Assistance (CVA).¹¹⁵ While this modality was employed predominantly (in terms of scale) by the FSA Cluster, it also formed an important part of the ES-NFI programme and was used by the Protection and WASH Clusters. This aspect of the collective response is coordinated through the inter-agency Cash Working Group. Although the evaluation could not assess the lessons from this use of cash, it is an area of growing importance and one that deserves full inter-agency cooperation, particularly relating to the harmonization of approaches around multipurpose cash.

112. For example, the number of FSAC members increased from 74 in 2021 to 237 by 2023 (HRP).

113. For example, the WASH Cluster mailing list increased from c.100 to c.300 recipients. Of these c.200 new recipients, only twenty were accepted as full members able to access AHF funds.

114. The HCT had from the outset deemed that Taliban participation in needs assessments was unacceptable. [HCT 050821]

115. The 2023 HRP noted that 'In 2023 it is estimated that at least \$972 million of the \$4.63 billion requested for Afghanistan responses is planned to be delivered in cash, this includes both sectoral and multipurpose cash. The principal Clusters employing CVA as a modality, are the Food Security and Agriculture Cluster (FSAC) – mainly Cash for food and ES-NFI mainly cash for shelter/winterization/transportation, with protection and WASH sectors occasionally employing CVA'

186. Finding 4M. At individual sector level, most Clusters performed well, although recruitment and funding issues left some posts unfilled at Provincial level. Inter-sector coordination through the ICCT worked relatively well, but practical collaboration between sectors was patchy and limited to bilateral agreements between lead agencies. The evaluation found limited evidence of truly multi-sectoral approaches, although using multipurpose cash holds significant potential in this regard.

SECTION 5:

ACCOUNTABILITY, FEEDBACK AND MANAGEMENT OF AID RISKS

Introduction

187. This report is concerned with the collective humanitarian response. However, most of the existing accountability mechanisms are concerned with individual agency and programme performance. This presents an evaluative challenge in assessing collective accountability to affected populations and donors. In addition, aid agency accountability does not sit within a vacuum. It can only be judged within a framework of fulfilment by the Taliban DfA of basic state and local government responsibilities for the security and welfare of the Afghan people. This includes a responsibility to enable the provision of humanitarian assistance where it is needed. Donors are also responsible for enabling essential and flexible humanitarian aid provision, particularly in a context where their decision to suspend development funding and cooperation is a significant contributory factor to the crisis. However, there is no mechanism or framework of collective accountability for this – beyond high-level commitments like the Grand Bargain and Good Humanitarian Donorship initiative – or for the application of humanitarian principles to aggregated funding decisions.

Accountability to donors

188. While the evaluation was unable to assess this issue in detail, donors consulted for the evaluation generally expressed reasonable satisfaction with the level of accountability for the use of funds provided. Two main issues arose in this area. One concerned the costs of delivery and particularly the indirect costs charged by some agencies, for which adequate justification appeared to be lacking (an issue beyond the scope of the current evaluation). The second concerned levels of exposure to aid diversion. The evaluation could not reach firm conclusions on the nature and extent of aid diversion or misappropriation. It found the response remained too exposed to fiduciary risk and was too dependent on mechanisms like AAP and existing monitoring systems to guard against this. The issues surrounding potential diversion or misappropriation of aid are considered in more detail below.

Accountability to affected populations

189. Established in July 2020, the Afghanistan Accountability to Affected People Working Group (AAP WG) operates under the co-chairmanship of the Agency Coordinating Body for Afghan Relief and Development (ACBAR) and the United Nations Population Fund (UNFPA). Replacing an earlier Community Engagement Working Group, the establishment of the present AAP Working Group was motivated by the need to strengthen response-wide accountability and community engagement.¹¹⁶ Concurrently, a UNHCR multisectoral rapid assessment conducted in late 2021 highlighted the necessity for direct communication through in-person feedback, complementing the existing nationwide feedback mechanism, the Awaaz telephone hotline.¹¹⁷

190. The system-wide hotline, Awaaz, established in 2018, functions as a conduit for communication between affected individuals and the diverse humanitarian organizations operating across various

116. This evolution was prompted by a 2019 Afghanistan Peer 2 Peer Mission, which emphasized the need for a more comprehensive and resilient collective approach to Accountability to Affected People.

117. Inter-agency Rapid Gender Analysis, GiHA November 2022

sectors.¹¹⁸ Awaaz does not directly handle cases but functions as a referral mechanism, directing concerns and complaints to the relevant agencies. Several humanitarian agencies, including the World Food Programme (WFP) and the United Nations High Commissioner for Refugees (UNHCR), operate their own hotlines. Due to funding constraints, Awaaz was not scaled up in line with programme scale-up and could only answer around 10 per cent of the 51,000 calls it received each month.¹¹⁹ Calls frequently concerned the beneficiary selection processes and the quality of assistance provided by humanitarian organizations.¹²⁰

191. The Whole of Afghanistan Assessment 2022 highlights that many households lack information about humanitarian assistance and the associated AAP channels, with 64 percent of households unaware of how to access such support, particularly in rural areas.¹²¹ This issue disproportionately affects specific demographic groups, including older men and women, people with disabilities (both physical and mental), those with chronic illnesses, and adult women.¹²² Information tends to be disseminated through male community leaders and household heads, resulting in limited access for women, especially those in women-headed households with distinct social networks.¹²³ The WoAA 2022 revealed that 77 percent of women-headed households were unaware of available feedback mechanisms.¹²⁴
192. The new collective AAP strategy, formulated by the AAP working group and endorsed by the Humanitarian Country Team (HCT) in spring 2023, represents a significant advance on the earlier strategic framework¹²⁵ and establishes a solid foundation for tackling existing accountability challenges.¹²⁶
193. The Afghanistan Community Voices and Accountability Platform established by UNFPA in 2023 is a central pillar of the revised framework. This dashboard serves as a lens through which stakeholders can scrutinize call patterns, feedback trends, and emergent issues. The aim is to encourage exchange of best practices, lessons learned, and innovative strategies among stakeholders. This new feedback channel does not supplant Awaaz but is intended to complement it.
194. Following the bans on female Afghan workers, a rapid consultation involving over 800 women and girls was conducted through the Awaaz helpline to explore community engagement issues within the local humanitarian responses.¹²⁷ In the wake of this consultation, system-wide efforts to reach women expanded, and half of the feedback responses were from women.¹²⁸ Regarding the accountability dimensions of programming, Minimum Standards for Programming were compiled in 2023,¹²⁹ while the GiHA Working Group, together with GenCap, produced guidance for women community volunteers together with advocacy and other tools intended to promote accountability to women and girls. The evaluation was unable to assess the impact of these initiatives.
195. **Finding 5A. The humanitarian system took too long to establish robust collective mechanisms of Accountability to Affected People (AAP). The introduction of the collective AAP Strategy for**

118. Awaaz receives funding from various sources, including the Afghanistan Humanitarian Fund (AHF), the European Civil Protection and Humanitarian Aid Operations (ECHO), as well as contributions from individual UN agencies.

119. The IAHE community consultation found that many respondents faced difficulties in reaching the hotline.

120. Inter-agency Rapid Gender Analysis 2022.

121. WoAA 2022. REACH.

122. Inter-agency Rapid Gender Analysis 2022.

123. Ibid.

124. WoAA 2022.

125. Accountability to Affected People (AAP) in Afghanistan – Strategic Framework 2020.

126. The strategy aligns with the International Standards for Accountability and Participation (ISAC) framework, translating global principles into actionable steps for local implementation.

127. Collective AAP Strategy 2023-2024.

128. Ibid.

129. These were put together by the Working Groups for GiHA, AAP, Disability Inclusion and the PSEA network.

2023-2024, transition away from hotlines, and practical guidance on accountability to women and girls represents significant progress. However, this had yet to show its value in practice at the time of the evaluation.

Feedback from community consultation

196. A community consultation exercise was undertaken as part of the IAHE process, covering multiple provinces across the five regions of the country.¹³⁰ The aim was to bring to the evaluation the voices and concerns of Afghan communities concerning their priorities, their experiences as aid recipients (or non-recipients), and their suggestions for improving the ways in which assistance is provided, particularly to vulnerable people within their communities. The consultation exercise, conducted mainly in June 2023, built on the results of earlier surveys and reports conducted by GeoPoll (2021), GiHA (2022), REACH (2022), and GTS (2022), providing a perspective of one to two years on. It differed from these earlier surveys in that all the interviews were conducted face-to-face with people in their communities, and researchers visited each site. In areas where it was possible to work with local female research assistants, the consultation succeeded in talking with women in the communities and better understanding the gender dimensions of the situation.¹³¹
197. Responses about aid-related feedback mechanisms varied, from those who did not know about complaint mechanisms to those who had tried using these mechanisms – but often got no response. “This is the first time we hear from you about any complaint mechanism. No one has told us that we can complain too.”¹³² “Once we all got together and decided to stand against this injustice, we wrote a petition... to the district administrator.”
198. Some communities or individuals who tried to register a complaint never heard back. Relatively few reported a positive outcome to such feedback: “[...] We shared the matter with the Department of Economy, then the [food] quality improved a little, and it became edible.” Some reported gaps in the feedback system or barriers to accessing these systems: “There is lack of an organized mechanism for addressing people’s complaints regarding aid distribution process. People try to visit the organization’s office or the provincial governor’s office, but their problems remain the same.” “People are illiterate and don’t know how to write a complaint or call the number written on the cards.” “People visit the district governor’s office, but their problems remain unresolved because [staff] listen to the district governor and abide by his orders.”
199. Findings from the earlier studies also highlighted a lack of understanding of complaints and feedback mechanisms. The GTS (2022) report indicated that 73 per cent did not know how to complain about health services, and those who did so saw no results.¹³³ Some positive cases were reported where interviewees complained to local district authorities about misconduct and steps were taken to address the issue. Fear of exclusion from future aid was one factor that discouraged complaints by community members. Some reported their names would be excluded from future aid distribution if they complained: “We have been threatened repeatedly to stay calm. Otherwise, you will be left out of any aid distribution. That is the reason we have kept quiet. We have left to Allah to do justice and take our rights from the oppressors.”
200. Aid recipients consistently complained about a lack of transparency. Specifically, they reported that NGOs did not disclose the contents of food packages when they made beneficiary selections

130. A full report on the results of this consultation can be found in Annex D.

131. The consultation had around 23% female representation among its respondents.

132. The community where this comment was in a remote part of Nuristan where aid may have reached less frequently.

133. GTS (2022), “Protecting and improving healthcare: Community insight from Afghanistan”, prepared by Ground Truth Solutions and commissioned by WHO. PDF file accessed on 15.07.2023.

or how many families in that community were supposed to receive food aid. In many cases, only a few who supplied ID cards received aid. This raised questions about NGOs' transparency and accountability and damaged their reputation. Some questioned their impartiality: "NGO employees commit favouritism by including ineligible families in the list, and people contribute to the problem by creating a disturbance and other techniques."

The role of local authorities and local authorities

201. Those consulted through the community consultation process also shared their views on accountability to and from local authorities. The main issues raised concerned local authorities asking for beneficiary lists, pressuring NGOs to recruit their favoured staff, or adding their preferred beneficiaries to the list – although, in some instances, local authorities were reportedly helpful in tackling corruption. "When we complain to the government officials, they would say they are not involved in this aid distribution. While the fact is that the whole process is under their control and aid is distributed as they wish." "The aid does not go to poor families, the government officials interfere in beneficiary lists, and NGOs are accepting relations. In Nuristan, corruption was an issue, but the distribution process was relatively well organized."
202. There was widespread concern regarding local interlocutors (community representatives) in both urban and rural settings. The Wakeel-e-Guzar (Community representatives in urban settings) and the Malik (Community representatives in rural settings) are the main gatekeepers of humanitarian aid distribution across the country. Most interviewees shared concerns about nepotism among these representatives, including the diversion of aid to their preferred list instead of those most vulnerable. Most official reporting refers to rural community representation as the Community Development Council (CDC) heads, but given that neither CDC elections nor the representation process were renewed in recent years, there is concern about the legitimacy of their representation and downwards accountability to the population they represent. This raises questions about the mechanisms humanitarian aid agencies rely on when identifying local interlocutors prior to surveying an area or selecting a site for aid distribution. "There is lack of transparency in the process of survey, and council heads try to influence surveyors to include their relatives."

Overall findings from the Community Consultation

203. The following general conclusions emerged from the community consultation undertaken as part of this evaluation:
204. Finding 5B. Feedback from the consultation demonstrates the importance of understanding the whole context that households face. Considering this programme by programme, or sector by sector, only shows a part of the picture. The various challenges people face are closely interlinked. This suggests the need for multi-sectoral, area-based consultations rather than simply processes of programme-related needs assessment and identification of lists of eligible households.
205. Finding 5C. The feedback highlights problems of trust and particularly concerns about the beneficiary selection process and the role played by community representatives (Maliks and Wakeel-e-Guzar). Securing trust in a context of widespread mistrust and suspicion (justified or not) of official bias and corruption is difficult. Transparency and good communication are central to this, as is collaboration with community consultative bodies, including CDCs and local shura.
206. Finding 5D. Multipurpose cash appeared to be especially valued as a form of assistance, particularly for its flexibility and for the fact that there were no transport costs associated with it. Access to

assistance and the cost of travel are recurrent themes. More generally, the pressures on household incomes, levels of indebtedness and sometimes extreme coping strategies were common themes.

Aid capture, corruption, and diversion

207. Concerns about official corruption in Afghanistan are not new: indeed, they were a feature of much of the period of the Republic.¹³⁴ However, donor concerns about potential aid capture, corruption and aid diversion by the DfA have grown over the evaluation period. A recent July 2023 report released by the Special Inspector General for Afghanistan Reconstruction (SIGAR) states that ‘it is no longer a question of whether the Taliban are diverting assistance from our programs to help the Afghan people, but rather how much they are diverting.’ It cites a recent USIP report for USAID¹³⁵ as finding that “the Taliban appear to view the UN system as yet another revenue stream, one which their movement will seek to monopolize and centralize control over.”
208. This evaluation heard multiple accounts of suspected aid diversion, varying in scale. The most serious of which, in Ghor Province, led to a general suspension of programming.¹³⁶ However, while most respondents commonly agreed that the risk was real and growing, they felt it was not of such magnitude as to warrant a more general suspension. A comparison was made with other aid contexts like Somalia and the higher levels of corruption encountered under the previous government. That said, during the community consultation process undertaken for this evaluation, frequent allegations of corruption emerged, although local populations sometimes misconstrued low-quality food deliveries as evidence of fund diversion (not realizing that procurement processes are centralized). Other anecdotal reports emerged during informant interviews. “I personally observed a major incident at a cash distribution point. The Taliban was standing next to the person handing out the cash and was recording the names of people who received cash” (UN informant). Some forms of aid (cash, food) are more susceptible to diversion than others (seeds, salary payments).
209. When asked about such incidents, agency representatives acknowledged the problem but felt their monitoring and feedback (AAP) mechanisms were sufficiently strong to detect them and allow for appropriate remedial steps. It appears these mechanisms effectively identified the situation in Ghor and in other cases. However, the issues raised lead the evaluation to conclude that aid transfers – particularly cash but also in-kind transfers – face a level of exposure to diversion or misuse that is uncomfortably high. This, in turn, is linked to the issue of accountability, including post-distribution monitoring. Roundtable discussions with stakeholders recognized the constraints of the humanitarian system in effectively monitoring food and cash distribution beyond their designated points. The community consultation process for this evaluation also raises questions about mechanisms for accountability and feedback.¹³⁷
210. The evaluation team encountered cases where the DfA or community leaders advocated for aid deliveries to be distributed among the entire community rather than to specific individuals. This request could be interpreted in various ways: as a lack of understanding of humanitarian principles and needs-based targeting; as a difference of view as to the proper purpose and allocation of aid; or as something more like corruption and abuse of the aid process. Context is important when

134. See for example *Tackling Corruption in Afghanistan: It's Now or Never* – Centre on American Progress (2015) <https://www.americanprogress.org/article/tackling-corruption-in-afghanistan-its-now-or-never/>

135. <https://www.usip.org/sites/default/files/Political-Economy-Analysis-Submitted-to-USAID-May-2023.pdf>

136. Substantial aid diversion reports and threats against aid workers by the de facto Provincial Governor led to general suspension of activities in the province, with limited exceptions for lifesaving interventions. In July 2023, WFP reported that it had resumed activities in Ghor ‘after months of suspensions and negotiations with de facto authorities. In alignment with other UN partners, WFP has put in place robust safeguards and monitoring mechanisms.’ WFP Afghanistan Sitrep, July 2023.

137. It should be noted that these concerns are not new. As part of the Whole of Afghanistan Assessment (WoAA), conducted in the summer of 2021, when people were asked whether the aid system was accountable, only 30% felt that it was.

judging different cases. While not all cases can be classed as ‘corruption’, it is essential to establish the principle of needs-based allocation of assistance – particularly in a context of diminishing aid supply. This is difficult unless aid officials deliver a consistent message .

211. There is evident pressure to allocate aid and cash to DfA personnel, particularly soldiers, and it is apparent that the de facto authorities face resource constraints. In another post-conflict context, programmes of Disarmament, Demobilization, and Reintegration (DDR) might offer solutions, but the political landscape in Afghanistan renders this approach unfeasible and disarmament and demobilization are not on the DfA leadership’s agenda. “The DfA is struggling with the lack of resources. This is the root of their struggle. How do we provide for those soldiers who are holding the gun? These are issues we are not talking about” (Roundtable participant).
212. For their part, local authorities have their own take on aid corruption and lack of transparency, as the recent research report from Jackson, et al found.¹³⁸ ‘Local authorities uniformly expressed concerns. They denied “interfering” but justified any interventions as wanting to ensure aid was delivered to the neediest. “When the NGOs do a house-to-house survey to prepare a list, the Taliban officials come with the NGOs to make sure there is transparency,” one authority said, noting that the authorities wanted to provide more oversight than the Republic. Another felt that “NGOs often complain that the Islamic Emirate interferes in their affairs, but if they do not interfere, NGOs honestly do not provide this aid to needy people but distribute it based on relationships, so this is our responsibility as a government.”
213. Finding 5E. It has not been possible to reach firm conclusions on the nature and extent of aid diversion or misappropriation within the limits of this evaluation. ‘Interference’ or obstruction of aid – as well as community-level redistribution – should be distinguished from corruption or abuse of aid. The consensus among multiple informants was that incidents of abuse or diversion had not been at levels that caused them to consider a general suspension of programming, and there was relatively high confidence that existing monitoring systems would pick up such incidents. However, the evaluation found that AAP and post-distribution monitoring systems were not strong enough over the evaluation period to justify such confidence.

138. Principled Humanitarian Action in Afghanistan - May 2023 Jackson, A., et al. for DG-ECHO and DRC. (Unpublished)

SECTION 6:

POLITICS, PRINCIPLES AND ENGAGEMENT

Introduction

214. The Joint Operating Principles, agreed by the Afghanistan HCT in 2019 and then revised and re-affirmed in August 2021, commit the humanitarian community in Afghanistan to abide by a set of core principles, and a range of more specific obligations. These include the generally accepted principles of humanitarian action – humanity, neutrality, impartiality and independence – and other principles that have become accepted as central to responsible humanitarian action. They also include a set of more specific operational commitments (see Annex B).
215. This section considers the questions of principle surrounding aid to Afghanistan and how the particular principles and commitments in the JOP have been interpreted in the rapidly evolving aid environment in Afghanistan. It reviews the challenges both of interpreting and applying these commitments and whether IASC agencies have been able to fulfil these commitments. Some of the ethical issues and dilemmas that arose since the revision of the JOPs in August 2021 fall outside this framework, due to the impact of decrees and procedural requirements introduced since that date by the DfA. This section considers how well the humanitarian system has dealt with these issues collectively.

Politics and the aid environment

216. Although the current situation presents several parallels with the period when the Taliban was last in power in the 1990s, there are also many points of difference.¹³⁹ Under Mullah Omar's rule in the 1990s, restrictions on women and girls were more comprehensive, with women banned from any work outside the health sector and girls' education banned altogether.¹⁴⁰ Today, although differences persist between urban and rural areas, the general population (and women especially) is much better educated, has higher expectations and an understanding of their rights – and, as a result, expects more from the government. They are also in touch with the wider world through social media, mobile phones and the internet. The DfA are different from their predecessors of the 1990s, being both more sophisticated and more in control. Unlike their predecessors, they also inherited a functioning set of state institutions and had, to some extent, built up shadow institutions during the years of armed conflict. Yet under Mullah Hibatullah, political and policy control by Kandahar has gradually tightened, extending to all provinces, reinforced by the establishment of religious ulema councils at provincial level to oversee the application of Sharia law.
217. Fortified by military victory and firm in the belief of their own legitimacy, the Taliban's attitude to foreign-funded aid and those who provide it (NGOs in particular) has also changed. That attitude is now far more sceptical – indeed deeply mistrustful – than in the 1990s. As Kate Clark points out,¹⁴¹ the United States military and others had used aid during the previous twenty years as part of a 'hearts and minds' strategy. Humanitarians condemned what they saw as the instrumentalization

139. For a comparison of the two periods, see Clark, K. Bans on Women Working, Then and Now: The dilemmas of delivering humanitarian aid during the first and second Islamic Emirates. Afghan Analysts Network, April 2023

140. Ibid.

141. Ibid.

of aid and a contravention of humanitarian principles of impartiality, neutrality and independence. The suspicion of aid remains, and is seen as an instrument of Western influence. Mistrust of Western-funded and directed humanitarian aid presents a continuing obstacle to effective humanitarian response in the country. But the mistrust cuts both ways. As discussed in Section 5, donors fear (with some justification)¹⁴² that their aid is not only controlled by the authorities but also being misused and diverted, both to secure the Taliban's political position and to provide a significant source of revenue for local and central coffers.

218. When the ERC met with senior Taliban officials in September 2021, he emphasized 'humanitarian principles, gender equality and equal access to women and men to work.'¹⁴³ He secured assurances from the Taliban (confirmed in writing) concerning the humanitarian response, in line with assurances that different ministers had given HCT members. The subsequent few months are commonly referred to as a 'honeymoon period' in aid relations with the DfA, and the authorities appeared to have been genuinely open to the humanitarian agenda. Yet as time went on and the Taliban failed to secure the international recognition they expected or the release of frozen assets, the promised humanitarian space grew increasingly narrow (see below).
219. Debates about the politics of aid and related questions of principle extended to donor capitals. Much of this concerned the use of aid conditions to apply leverage on the issue of human rights, something that caused heated debate among agencies in the country. In Kabul, the HCT minutes [HCT 230921] record that 'WFP expressed concerns about the dangers of "conditional humanitarianism" — linked to political, human rights or other stipulations — which erodes the principles of impartial humanitarian assistance. WFP stressed the need to raise this issue with donors! They also noted that the EDG was directly engaged with donors on this issue and 'pushing for the Somalia-model which grants blanket comprehensive humanitarian exemption instead of a mechanism where a case-by-case waiver is needed.' The minutes note that the humanitarian donors expressed understanding of HCT members' frustration but that 'these high-level decisions are made at the capital level! It was also noted that the Afghan diaspora was calling on decision-makers in donor capitals to apply pressure on the de facto authorities on rights issues.
220. The less high-profile aspects of this debate about aid conditionality concern the decision by donors to suspend development assistance and the limits (conditions) put on the purposes for which humanitarian aid was allowed. As noted in preceding sections, these policies combined have shaped the nature of the aid response, making it substitutory and state-avoiding by design, and limited in scope and durability of effect. Whatever the political arguments for this, the result was a one-dimensional response, focused almost exclusively on the short-term needs of crisis-affected people and preventing the collapse of the fragile systems on which they depend.
221. Finding 6A. The politics of aid are informed by profound ideological differences and deep-seated mistrust on both sides. Many of the related questions of principle extend well beyond the practices of humanitarian agencies. Finding areas of relative trust and acceptance by the DfA is the fragile basis on which the humanitarian response currently depends in the country. Agencies have yet to convince donors that such work is not only necessary and effective, but that it can be done without risking aid 'capture' by the authorities.

142. See for example a recent AAN research paper: Aid Diversion In Afghanistan: Is it time for a candid conversation? Ashley Jackson for Afghan Analysts Network, September 2023.

143. HCT 090923

Applying principles and addressing aid dilemmas

222. Agreeing principles is one thing, but agreeing on how they apply to a particular context – and then applying them – is another. Following the Taliban takeover in August 2021, the HCT in Kabul reaffirmed its Joint Operating Principles and began to discuss how to operationalize those principles. The subsequent discussion of a ‘Ground Rules’ document containing ‘red lines’ for the humanitarian response proved highly divisive,¹⁴⁴ particularly between the UN and many of the NGOs represented by ACBAR. While most of the proposed rules were uncontroversial, a proposal to make programming conditional on obtaining written assurance of operational independence from the DfA – and a stipulation that all staff (men and women) be able to perform their roles without restriction – found strong opposition in the HCT, particularly from UN agencies. In the end, despite attempts to revise the document, they did not come to a consensus and the higher-level principles of the JOP remained the agreed common guiding framework on principles.¹⁴⁵ The divide on this issue subsequently played out again in similar terms over a year later in the debates about the proper response to the bans on female Afghan aid staff.
223. Two recent (2023) research papers looked at the application of principles in detail and the approach to ethical dilemmas in the current context of Afghanistan, based on multiple interviews with humanitarian actors and communities in the country. The first of these¹⁴⁶ covers the dilemmas facing humanitarian actors in Afghanistan and the role that humanitarian principles play in dealing with them. Stressing the limits of humanitarian action and humanitarian principles in the face of political intransigence, it calls for a long-term humanitarian engagement strategy and action plan at the country and local levels, guided by humanitarian needs rather than donor constraints. It calls on donor agencies and governments to engage with the authorities to enhance humanitarian space and support country-level humanitarian efforts.
224. The second paper¹⁴⁷ considers the issues of principle involved from a broader ethical perspective. It makes a case for ‘principled pragmatism’ in the face of apparently conflicting demands of humanitarian and human rights principles, focusing on addressing acute needs and maintaining vital social services while working to overturn the bans on Afghan female staff. Informants to this study suggested that donors should have been more actively and collectively engaged at the diplomatic level rather than leaving this to humanitarian agencies. Evidence from its field work suggests a majority of women, while overwhelmingly opposed to the Taliban decrees on women, favoured maintaining the international aid presence. It also found that humanitarian organizations lacked adequate (or any) frameworks for deciding on ethical issues; and it urged realism in any assessment of the humanitarians’ ability to influence the situation in the country.
225. While the principle of *humanity* – and the related ‘humanitarian imperative’ – has only intermittently appeared to guide the policies of political actors in Afghanistan, the humanitarian community has invoked the principle repeatedly, both in its dealings with donors and the DfA, and in its internal debates about the sometimes conflicting priorities of the humanitarian and human rights agendas. The appeal to the humanitarian imperative was justified over the evaluation period, but it was overstated at times. One example is the tendency to label interventions like food assistance as ‘life-saving’ by definition when such claims often have little basis in evidence. Nevertheless, the imperative to assist was present across most sectors over this period and the principle of humanity was rightly invoked. This is a principle that extends well beyond specialist humanitarian action into the realm of public policy.

144. As had a similar initiative in Yemen, which also foundered on a lack of consensus.

145. Other issues too divided the UN and NGOs, particularly the issue of armed escorts. [HCT 160923].

146. Principled Humanitarian Action in Afghanistan - May 2023 Jackson, A., et al. for DG-ECHO and DRC. (Unpublished).

147. Navigating Ethical Dilemmas for Humanitarian Action in Afghanistan – Humanitarian Outcomes for UK HIH, June 2023. https://www.humanitarianoutcomes.org/sites/default/files/publications/ho-ukhih_afghanistan_final_6_21_23.pdf.

226. Maintaining independence of policy and operations would always be a struggle in a context where aid is such a highly charged political subject. This is particularly true of policy independence when agencies are so highly dependent on a few major donors and where some of the largest donors are heavily invested in trying to determine an alternative political future for the country. Working within strict conditions set by donors is not unusual (Syria presents another recent case), and the evaluation noted that foreign aid ministries have, in discussion with the HCT, made efforts to protect the humanitarian agenda from the vagaries of the political debate. Nevertheless, any claim to independence of policy is hard to sustain for agencies that are dependent on the donor governments. It is difficult to make a case for operational independence, given not just the limits imposed by donors but increasingly by the control exercised over the aid agenda by the de facto authorities.
227. The principle of neutrality is summarized in the JOP as follows: ‘Humanitarian actors will not participate individually or organizationally in hostilities or taking sides in controversies of a political, religious or ideological nature.’ On the face of it, most agencies have failed this test to the extent that they have insisted on the rights of women and girls in a context where those rights are denied. This says more about the limits of the principle than any failure of humanitarians. The principle was designed to ensure acceptance and aid access from parties to an armed conflict. In the present context, however, insisting on principles central to the basic norms of the United Nations can hardly be called non-neutral. Using rights arguments has proved difficult and sometimes counterproductive in terms of access. In practice, many agencies stressed the humanitarian consequences of the denial of the rights of women to work and girls to go to school.
228. The principle of impartiality – providing aid without favour, based on need and in proportion to need – was tested in the Afghanistan context over the evaluation period. The evaluation found that the intent and practice of agencies in this regard had generally been strong. However, a lack of evidence about needs and priorities sometimes made this difficult to demonstrate. Perhaps most importantly, agencies appear to have taken strong individual and collective positions on targeting criteria and distribution lists in the face of pressure from authorities to change the latter or redistribute aid on a different basis. Consultations with multiple informants suggest that the Humanitarian Access Group has played an important role at central and regional levels.
229. Finding 6B. Applying the principles of humanitarian action in Afghanistan has been challenging on several fronts in relation to the bans on female Afghan aid staff. With regard to the core humanitarian principles, the evaluation found the humanitarian community was justified in invoking the humanitarian imperative, although this had sometimes been overstated. It had worked hard to defend the principle of needs-based response embodied in the principle of impartiality while often falling short for reasons largely beyond its control.

The bans on female Afghan aid workers¹⁴⁸

230. On 24 December 2022, the DfA (Ministry of Economy) issued a decree preventing female Afghan aid staff from working for national and international NGOs, citing ‘serious complaints regarding non-compliance with the Islamic hijab’ and other alleged breaches. This ban was consistent with the rapidly shrinking space for women to live and work freely in the public sphere and raised issues both of principle and viability of existing operational approaches. The HCT agreed to an ‘operational pause.’ Some NGOs temporarily suspended their programmes, while others struggled to implement their programmes, particularly the components that depended on contact with crisis-affected Afghan women for their delivery. Women’s organizations faced particular pressures¹⁴⁹.

148. Annex C contains a fuller discussion of the bans on female staff, their impact and the debates within the aid system around the proper response to then bans. Here we note only some of the main issues arising.

149. HCT 120123

231. The UN initially appeared not to be directly affected by the decree, although many of its implementing partners were. Four months later, in April 2023, the situation was compounded when the ban was extended to the female Afghan staff of UN agencies. UNAMA issued a statement condemning the ban, refusing to comply and describing it as *'unlawful under international law, including the UN Charter'*. The head of UNAMA, as SRSG, initiated a period of operational review up to 5 May 2023.
232. The bans had an immediate and disruptive impact on the functioning of aid programmes and led to heated policy debates in the international humanitarian system and the Afghanistan HCT. The decrees themselves were seen by many as part of an attack on women's rights as well as humanitarian agencies' independence and the viability of their programmes. The ERC and IASC Principals were asked to advise on a situation with political and policy ramifications within and beyond the country. After issuing a strongly worded joint statement on the NGO ban and instigating a partial one-month pause for non-time critical programmes, the principals met with senior DfA officials and with the HCT in January 2023.¹⁵⁰ They agreed on a basic common approach following that visit, one that reaffirmed the humanitarian imperative and commitment to *'stay and deliver'*.¹⁵¹ The approach was based on an insistence that services *'be delivered whenever and wherever possible with a meaningful and active presence and participation of female aid workers'*. The ERC noted a consensus in the humanitarian community that it *'would work when it can with women's participation'* and would not replace female staff members with male staff.¹⁵²
233. In practice, agencies and clusters had to forge their own solutions, depending on local context and the attitude of different authorities, as well as that of different donors. An IASC monitoring framework was established by OCHA to monitor the impact of the bans on the humanitarian response based on reports from agencies against an agreed set of indicators.¹⁵³ By the time the evaluation team visited Afghanistan, much of the impact of the bans appeared to have dissipated. Yet although most agencies had found more or less effective *'workarounds'*, it remained a live issue and one from which lessons can and should be learned.¹⁵⁴

A divided humanitarian system

234. The bans on female aid workers proved highly divisive. The issue created a dilemma for the humanitarian system, caught between its commitment to women's rights and operational independence on the one hand and the imperative of continuing to deliver life-sustaining humanitarian assistance on the other. Agencies adopted diverse approaches to addressing this, ranging from a complete suspension of aid to maintaining business as usual as far as possible. Each agency has had to consider its mandate and policies in responding to the bans. Overall, a divide is evident from the HCT minutes [see e.g., HCT 230123] and from informant interviews between the attitudes of the more operational agencies and those whose mandates are more *'normative'* and policy-related. Other fault lines arose between UN agencies and NGOs, with many of the latter feeling unsupported by the UN. They were expected to continue to deliver after the ban on their female staff. This impacted local agencies in particular.

150. A summary of the discussions can be found in the HCT minutes for 23rd and 25th January 2023 [HCT 230123 and 250123].

151. Following its in-country mission, the IASC recommended moving from an *'operational pause'* to an *'operational trial'* period supported by a related concept of operations.

152. HCT 250123

153. The value in terms of accountability gains of the related monitoring framework was questioned by some, partly on the grounds of (time) cost; but the evaluation lacked the evidence to draw firm conclusions on this issue.

154. The same could be said for the period in the 1990s when the Taliban were last in power and applied similar restrictions on women and aid organisations, as well as a complete ban on girls' education. See Clark, K. (2023). *Bans on women working, then and now: The dilemmas of delivering humanitarian aid during the first and second Islamic Emirates. Afghanistan Analysts Network (AAN). The preamble to this paper sums up the choices for humanitarians as: 'familiar, and all unattractive: comply, boycott or fudge.'*

235. The humanitarian system has struggled to speak with one voice on this issue and was profoundly divided on how to proceed. Many saw this as a deliberate provocation by the DfA to hit back at the international community and confound the process of international assistance. This largely succeeded, by sowing confusion and disagreement for a period within the coordinated system. *“The ban on women working for NGOs was the most effective way to divide the humanitarian community. It fragmented and divided everything and everyone. There were some divides even before the ban, but the current situation is truly unprecedented.”* [Gender specialist informant].
236. On the question of aid suspension in response to DfA gender policies, the evaluation concluded that a general suspension of aid would have been wrong in principle and probably ineffectual in practice in terms of influencing policy (Finding 6C). Resorting to a strategy of what would amount to deliberate deprivation in an attempt to influence policy (or for its own sake) runs counter to protection principles (see Box 5 in s.4) and the humanitarian imperative. Arguably, it also imposes an extrinsic (political/rights) condition on providing assistance, contrary to more general humanitarian norms.
237. However, there are limits to this argument: either where the policies in question make it impossible to substantially fulfil the humanitarian imperative in accordance with humanitarian principles (notably impartiality); or where the imperative cannot reasonably be said to apply. Both of these are matters of judgment and will depend on context. A third limit, related to the first, concerns situations where the proper use of aid cannot adequately be accounted for or where there are reasons to think that aid has been misused or misappropriated.
238. In the Afghanistan case, although the quality and reach of assistance to women and girls has been compromised (as has the safety of the female Afghan staff), the evaluation concluded that overall, sufficient access and reach was maintained for women and girls to meet the first criterion (Education and Protection are the most compromised sectors in this regard). As to whether the humanitarian imperative applies, the evaluation notes the danger of over-extending the principle by applying it almost by definition to anything the humanitarian sector does rather than as a response to acute threats to life, health or security. In the case of Afghanistan, the evaluation found that invoking the imperative appears to have been justified over the main sectors of concern (Finding 6B) but this had too often been simply assumed.

BOX 6. Decisions on programme suspension or withdrawal

A decision to suspend potentially life-critical support will always be an exceptional one. The default position must be to act on the imperative where it is judged to apply. Such a decision is most likely made by individual agencies (and potentially their donors), but from time to time, the question of a more collective, sector- or system-wide suspension can arise, as in Afghanistan. The proposed suspension may be specific to a particular locality (as in the Ghor case) or programme component, or it may be more general. It will typically arise from a situation where either the humanitarian response is compromised in its ability to deliver in accordance with basic principles, or where it cannot ensure the proper use of assistance provided.

While no general rule can be formulated – this will always be a judgment call – the evaluators suggest that the IASC could provide further guidance on criteria for decision-making in such cases, including:

- (i) Does the humanitarian imperative apply to the programme in question?
- (ii) If so, is the humanitarian system's ability to deliver critical assistance in accordance with basic humanitarian principles (particularly impartiality) so compromised as to undermine the whole enterprise?
- (iii) Can the most basic requirements of accountability be met with regard to the proper use of assistance provided?
- (iv) For a decision to suspend programming in whole or in part, can criteria (and related indicators) be defined for deciding whether and how to resume programming?

239. Finding 6C. The evaluation finds that the second (UN) ban should have been anticipated and prepared for and that the response to both bans should have been more concerted – allowing that agency mandates, sector-specific factors, and different local contexts all meant that some diversity of approach was inevitable. On the question of aid suspension, the evaluation concludes that a more general suspension of aid would have been wrong in principle and probably ineffectual in practice. Resorting to a strategy of what would amount to deliberate deprivation in an attempt to influence policy runs counter to protection principles (see Box 5 in Section 4 above). It also effectively imposes a political condition on the provision of assistance, contrary to more general humanitarian norms.

240. Finding 6D. The decrees preventing female Afghan staff from working for NGOs and the UN have affected both the implementation of the humanitarian response and the welfare and security of female staff. The programme ban affected some sectors severely (particularly Protection), even with the negotiated exemptions. Advocacy on this issue was only partially successful, with most progress apparent at local and sector-specific levels.

Engagement with the De Facto Authorities

241. Finding appropriate ways to interact with the DfA has troubled the IASC agencies from the early days of the post-August 2021 response.¹⁵⁵ This is partly a reflection of the attitude of their principal donors. For most of the donors, any form of engagement that implies acceptance or recognition of the Taliban or risks providing them with political or material benefit has been anathema. UN agencies and NGOs have been wrestling with issues of mandate and principle – including both principles of humanitarian action and human rights, regarding the freedoms of women and girls.¹⁵⁶

155. See e.g., HCT 300821

156. As noted above, the HCT struggled to operationalise the general principles set out in the Joint Operating Principles (JOPs). These JOPs 'form the framework for engagement in bilateral and joint negotiations with authorities and armed groups at local, national and international levels in an increasingly complex situation.' (Extract from JOP text).

While the associated challenges have evolved following an initial 'honeymoon' period, the issues involved were a constant feature of the humanitarian context over the evaluation period.

242. Key informants for this evaluation provided evidence of the interplay between humanitarian agencies, the de facto authorities, and major international donors. A significant complicating factor arises from the fact that several prominent donors were engaged in armed conflict with the Taliban until recently. A general policy of formal non-engagement by major donors at the political level left operational humanitarian agencies as the primary interlocutors with the DfA. The Taliban perceives the United Nations agencies and the aid agenda as a critical entry point into the international system despite the absence of a formal negotiating mandate for the UNAMA. This poses difficulties for the humanitarian system as it wrestles with roles and responsibilities that extend beyond its traditional scope and capacities. Part of the expressed role of the HC has been to try to 'firewall' the humanitarian agenda from politics, but this proved almost impossible in a context where, for both the donors and the DfA, aid and the control of aid is part of a political agenda.
243. The absence of a political process is felt at all levels. Most donors maintain a strictly limited humanitarian posture in Afghanistan, driven by concerns of being perceived as endorsing the Taliban and a potential backlash from their domestic constituencies. During the evaluation interviews, a recurrent theme was the pressing need for a political process, the absence of which is viewed as exacerbating existing challenges, eroding trust, and placing aid actors in an untenable position. "The previous government understood that we wanted to work with them. Now the de facto authorities know we are not interested in building their capacity. That's why they are much more antagonistic." "The aid community in Afghanistan is between a rock and a hard place, having to navigate interactions with the Taliban and with the donors." "Everyone hides behind the humanitarians, but also scapegoats them" [Roundtable discussions, UN staff].
244. Many within the humanitarian community see the ongoing debate about engagement with the de facto authorities as misleading and unhelpful. Here, as in other humanitarian situations, aid actors are compelled to seek approval from the authorities to ensure the continuity of their operational presence. Moreover, the efficacy of various sectors of intervention is heavily reliant on the active involvement of the de facto authorities. For instance, activities such as training laboratory staff for cholera/AWD screening demand close coordination with the Ministry of Health (MoH) and its personnel at multiple levels. Similarly, the effectiveness of mine action relies on collaboration with the DMAC, which falls under the jurisdiction of the de facto authorities.
245. Numerous similar instances underscore the complexity of the situation. Where the engagement issue becomes most pressing is in relation to strengthening systems, building capacity or renewing infrastructure – in other words, work to tackle the more structural aspects of the crisis and ensure some degree of sustainability of effect and local ownership. Working with authorities and communities is a necessary feature of such work, but this is where donor restrictions and aid conditions are felt most. With limited exceptions, this 'bridging' agenda (humanitarian to development) has been off-limits, raising serious questions about the country's ability to exit the crisis cycle. Although aid is not the only factor here, it is crucial, especially given the extent of historic aid dependence.
246. The complexities that aid agencies face in navigating interactions with the de facto authorities are compounded by the lack of clear guidance from the United Nations Security Council (UNSC) and headquarters. The difficulties the HCT had in agreeing to ground rules early on in the post-August 2021 response reflected the diversity of views within the humanitarian community,¹⁵⁷ which intensified following the bans on female Afghan aid staff in late 2022 and April 2023. The absence of a unified strategy for engaging with Taliban counterparts across all Clusters has led to diverse

157. See e.g., HCT 300821 and 160921

approaches being adopted by agencies and NGOs, reflecting the different kinds of agenda involved and the different relationships agencies have with their respective ministries and directorates. Some agencies focused on collaborating with low-level staff while minimizing interactions with higher-ranking individuals. Conversely, other agencies emphasize the importance of engaging with higher authorities to address ongoing challenges.

247. There are indications that the stances on the issues of engagement are gradually evolving, as some countries are advocating for greater direct engagement with the de facto authorities, even contemplating the revival of diplomatic presence in Kabul. Some donors have disregarded certain forms of engagement to ensure humanitarian assistance reaches those in need. Nevertheless, the enduringly politicized environment remains a significant hurdle in upholding an impartial humanitarian effort. Several interviewees expressed a preference for greater involvement from non-traditional donors, particularly the Gulf states, as they perceived Western donors, previously engaged in military operations in Afghanistan, as having tarnished credibility. Concerns were voiced that with limited funding available in 2023, the system's influence and leverage could decline further, straining relationships even more. As one INGO informant said, "If the de facto authorities see that not much is happening, I think relations will deteriorate".
248. Finding 6E. The Afghanistan context lacks any true political process between the authorities and the international community. Humanitarian aid agencies are expected to bear the burden of international engagement with the DfA. The terms on which they are allowed to do so are tightly constrained. For their part, the DfA have made it increasingly difficult for agencies to engage or to work towards more sustainable forms of engagement through their bans on female Afghan aid staff, increasing restrictions on humanitarian space and the instrumentalization of aid.

De facto Authorities intervention in humanitarian operations

249. Over the course of the evaluation period, the growing control exercised by the DfA over aid operations led to a substantial contraction of humanitarian space. This was first formally evidenced in the introduction of a framework for regulating the NGOs' activities, released in February 2022,¹⁵⁸ followed by the establishment of a national monitoring committee in May 2022. UN data for the period highlights a substantial upswing in aid-related 'incidents' during 2022, which appears to have continued in 2023.¹⁵⁹ These incidents include movement restrictions, interference in beneficiary selection, procurement, and hiring processes. Such incidents typically take around three to seven days to resolve.¹⁶⁰ "Initially we were all on a honeymoon but then the DfA behaviour changed. They want to be part of all missions. They don't understand and accept that data is confidential" [Roundtable].¹⁶¹
250. There are several apparent motives behind this increase in DfA intervention. In interviews, respondents highlighted the strategic intent of the de facto authorities to present themselves as the primary deliverers of aid, a tactic reminiscent of 'hearts and minds' campaigns observed in prior stabilization efforts of NATO donors. UN agencies' practice of compensating Taliban escorts to ensure field mission security is now entrenched and is seen as difficult to change. From the perspective of the DfA, this arrangement not only generates revenue but also aligns with their strategy to garner

158. This has an earlier parallel in the 2020 draft NGO law proposed by the government of the Republic, which caused much concern at the time in the humanitarian community.

159. UN Security Council Report (09/2022). The situation in Afghanistan and its implications for international peace and security. The SIGAR quarterly report for April-June 2023 reports 'a 32% increase in incidents between January and May 2023 as compared to the same period in 2022. According to USAID BHA, Taliban interference in humanitarian assistance is the main barrier to beneficiaries accessing aid in 2023... including attempted aid diversion and bureaucratic roadblocks...'

160. Lang (2022). *Fit for Purpose: Getting Humanitarian Aid Right in Afghanistan One Year after the Taliban Takeover*.

161. The SIGAR report cited above notes that: 'According to analysis from USIP, the Taliban are comfortable accepting foreign support insofar as they can closely monitor the organizations, including restricting and controlling them, and claim some credit for the provision of the benefits.'

popular support by being present at aid distribution points.¹⁶² It also provides a mechanism for closely monitoring field missions. Several key informants highlighted the lack of mutual trust, fuelled by widespread accusations that agencies act as spies or foreign agents.

251. Many respondents noted a limited understanding of (or sympathy with) the core principles of humanitarian assistance among the DfA. They stressed the importance of explaining those principles, as well as the vulnerability and beneficiary selection criteria, to the authorities.¹⁶³ They also noted that while some requests for information may have ulterior motives, others may not. Some believed that through dialogue and transparency, appeals made by the de facto authorities to intervene in operations could often be effectively addressed.
252. Finding 6F. The Taliban authorities have increasingly exerted control over the aid agenda, imposing ever more onerous policy and bureaucratic requirements – including the bans on female Afghan staff and the extremely time-consuming process for NGOs to secure MoUs. Both have reportedly had a substantial detrimental effect on timely and effective aid delivery. The response by aid agencies to these obstacles has been pragmatic, a combination of accommodation to the terms of the DfA edicts (such as the use of mahram) and the negotiation of exemptions from the bans. The evaluation concludes that such approaches were warranted by circumstances and the imperative for aid. However, because the approach lacks harmonization it has created problems of standards being applied inconsistently across the country. Continued advocacy is essential to ensure that such approaches do not become the accepted norm for aid delivery in Afghanistan.

Challenges in negotiating access

253. Amid the multiple challenges of permissive access have been those faced by agencies in negotiating framework agreements and memorandums of understanding (MoUs) with the de facto authorities.¹⁶⁴ The UN introduced a decentralized engagement strategy to empower UN personnel at the field level for direct negotiations with the DfA. This approach, favoured by most informants, is regarded as more effective than centralized negotiations, which yielded limited positive outcomes. “It allows us to negotiate with provincial governors and some of them are cooperative. If everything is centralized, it is difficult to negotiate exemptions. We currently rely on these exemptions to get our work done.” [INGO informant].
254. While the decentralized strategy appears to have helped access negotiations, those negotiations are not conducted according to any consistent framework, resulting in disparities in the agreements achieved. Concerns were voiced by some respondents that “if one organization blinks, it comes back to others”, implying that the failure to address shared concerns by one organization can negatively impact the entire system. It is difficult in this context to maintain a “unified voice” as each organization is keen to secure favourable terms for itself. This has also contributed to a situation where MoUs vary significantly in scope: the duration of some MoUs was notably short, while one agency reported successfully securing a three-year MoU.
255. While the shift towards decentralized access negotiations has improved humanitarian access, it also highlights a significant concern surrounding the disproportionate reliance on Afghan nationals for engagement efforts, potentially exposing them to heightened risks. Conversations with national UN staff at the sub-national level underscore these concerns. Many expressed unease when interacting with the de facto authorities without the presence of international staff. Some DfA officials make

162. One senior respondent to the evaluation, discussing local government ‘branding’ of aid-funded WASH infrastructure, felt that this was inevitable and not necessarily undesirable. ‘We want them to own this agenda.’

163. Much work has been done on this. For example, OCHA reported leading more than 100 sensitization sessions.

164. Again, this requirement pre-dates the current administration and indeed dates back to the Taliban era of the 1990s.

practically unattainable demands, placing national staff in a difficult position. Given the lingering apprehensions from a violent past, some national staff members and organizations are hesitant to push back against these demands, which could lead to more significant challenges down the line.

256. National NGOs are generally more vulnerable to pressure from local administrations due to their more limited authority to decline requests than international NGOs, UN Agencies, or the Cluster. “There is a divide between INGOs and NGOs. They feel the heat in different ways than INGOs” [Roundtable discussion]. National and local NGOs are inherently more vulnerable given their limited reserves and dependence on programme funding, which weakens their negotiating position. While OCHA and the Humanitarian Access Group have taken steps to assist in access negotiations with staff (including female personnel), local NGOs – especially women-led organizations – appear to face particular challenges and risks. A report written by the UK aid watchdog ICAI stated that: ‘We heard from interviewees that local and national civil society organizations have been more impacted by the ban than international organizations. While UN and international NGO female staff were able to negotiate with local Taliban officials to continue their activities, the Taliban refused to negotiate with Afghan women, raising the risk of getting their projects cancelled. Local women-led organizations have raised concern that UN agencies were not adequately using their negotiating position with the Taliban to stand up for national organizations.’¹⁶⁵
257. While some organizations initially refrained from signing MoUs, this practice has now become the norm (as it was under the Republic). The perception is that the situation has worsened as de facto authority officials absorbed ‘unfavourable practices’ from the previous administration. Both national and international NGOs are obliged to obtain an MoU with the relevant government entity for each project, although the specifics of these agreements vary based across organizations. UN agencies are required to establish agreements with the Ministry of Foreign Affairs,¹⁶⁶ as under the Republic, whereas NGOs fall under the registration of the Ministry of Economy. Additionally, there are specific agreements tailored to different contexts. For instance, UNHCR has a framework agreement with the Ministry of Refugee and Repatriation.
258. While the requirement for MoUs is not new, the delays in securing them are recognized even by the DfA as an unacceptable hindrance to timely, effective programming. This was the most complained about aspect of engagement with the DfA by NGOs, combined with official involvement (some call it interference) in the details of programming. “We need MoUs; we cannot work without them. Now there are a lot of delays, and the de facto authorities want to be involved in all aspects, in the procurement, beneficiary selection, etc. The situation has become very challenging” [INGO informant]. It was reported that the de facto authorities have committed to ensuring MoUs are signed within a two-week timeframe, although whether this results in tangible improvements remains to be seen.
259. The ease of securing permissions may depend on the sector involved. The priorities of the de facto authorities concern food, cash, and health initiatives, while other activities – notably protection-related – are either deemed irrelevant or are openly disliked. Other inconsistencies arise from different applications of norms and directives across different regions. Certain provinces present greater challenges than others, often depending on the political discretion of governors to grant exemptions, alongside the personal inclinations of officials and their perceptions of benefits tied to specific activities. It is important to recognize that at the community level, the Taliban’s integration into community-based structures plays a significant role in shaping dynamics. “When we work at the community level, we need to be clear that the DfA are part of community structures. When they see benefits [at] the community level, they let it happen” [Protection Cluster informant].

165. UK Independent Commission for Aid Impact: UK aid to Afghanistan - Information note, May 2023

166. The ICRC and MSF also have MoUs with the Ministry of Foreign Affairs

260. Finally, the relative challenge of negotiation with the authorities is influenced by prior interactions with the Taliban during the era of the Republic. One respondent noted that the “politics of engaging with the Taliban did not undergo significant changes after August 2021” [National NGO]. Organizations that had established close relationships in the past seem to have a comparative advantage, and those with pre-existing ties were able to swiftly recommence their operations. Local organizations, particularly women-led organizations, appear to face a far greater challenge.
261. Finding 6G. While the practice of requiring MoUs is not in itself objectionable and certainly not new, the reality of the current practice is such that it severely impedes the work of humanitarian NGOs. This was the issue most commonly raised with the evaluation team by NGOs as an obstacle to the delivery of vital services. Informants stressed the importance of the UN (and OCHA in particular) prioritizing this as an advocacy agenda with the DfA and ensuring that the proposed reforms are introduced and delivered. They also emphasized the importance of the humanitarian system supporting (and not undermining) the work of local NGOs in this regard, particularly that of women-led NGOs; and of understanding local dynamics and the stake that the authorities have in community-level structures.

SECTION 7:

CONCLUSIONS, LESSONS AND RECOMMENDATIONS

General conclusions

262. This report highlights the crucial importance of the humanitarian response in Afghanistan, the stifling effects of current funding and in-country operating restrictions, and the inevitable limits of what is achievable in a protracted crisis through humanitarian action alone. The causes of the humanitarian crisis in Afghanistan are political and policy-related. Unless and until there is political movement that allows the economic and political isolation of Afghanistan to end, and willingness by the DfA to prioritize meeting the basic needs of all Afghans, that crisis is likely to continue. Even then, the country is likely to need humanitarian and development assistance in the medium term.
263. The humanitarian response since August 2021 has been a function not just of the collective efforts of humanitarian agencies and their Afghan and international staff, but of international donors' willingness to fund those efforts and of the de facto authorities' willingness to allow them. These latter factors set the parameters within which effective humanitarian action has been possible.
264. Within the limits imposed by external factors, the response by IASC agencies has fulfilled its primary humanitarian purpose. It has played a crucial role in protecting millions of vulnerable Afghans from many of the most severe threats they faced over the evaluation period. This was achieved through the direct provision of benefit to households, reduction of known risk factors, and work to ensure the continuity and extended reach of essential services. An important by-product of the response has been to help keep the Afghan economy afloat through the injection of cash over a critical period.
265. This conclusion must be qualified. Although it eventually scaled up to an impressive degree following the 2021 transition, some sectors and agencies were more effective than others and the response was only partially able to address the extent and severity of needs. Responding agencies and Clusters were not always clear about response gaps, often citing high 'reach' figures based on outputs that do not reflect the actual benefit delivered over time to vulnerable Afghans. Although relatively well funded through most of the evaluation period, that funding was quite narrowly focused and heavily conditioned. Recent cuts in funding have seen the gap between needs and response widen alarmingly. Meanwhile, the operating space for humanitarian work in-country has become ever more restrictive, as the DfA has exerted increasing control over this agenda and sought to instrumentalize it. The overall conclusion remains: the 'acute' response was generally effective and essential to the short-term well-being of millions of Afghans.
266. While the short-term needs of vulnerable Afghans have been relatively well served, their medium and longer-term interests have not. With few exceptions, this cannot be attributed to failures of the humanitarian system. Regarding medium-term outcomes – which become a matter of humanitarian concern in a protracted crisis – the conditions attached to funding and the adverse operating environment meant the approach was mainly palliative and one-dimensional. The response has lacked sustainable impact, forced to adopt repeated short-term fixes in the context of protracted crisis, unable to invest in more sustainable and efficient approaches, and lacking the ability to prevent foreseeable suffering.

267. The 'basic needs' agenda embodied in the 2022 UN Transitional Engagement Framework which was supposed to complement the humanitarian agenda through support to central services and community-level systems, was only partially realized over the evaluation period. In practice, there was no sustained and coordinated support scheme for basic services beyond essential ad hoc interventions to prevent system collapse. Although funding for the 'basic needs' agenda grew in 2023, this was in the context of much reduced humanitarian support, and these two agendas remained poorly coordinated. Meanwhile, the humanitarian system has been performing functions it was not designed to perform beyond the immediate short term; and the structural and system-related risks involved are not amenable to humanitarian solutions.
268. With respect to longer-term outcomes, the humanitarian response could not be expected to fill the gap left by the withdrawal of development assistance. The symptoms of the crisis derive from the impact of specific 'shocks' (natural and economic) on top of more structural vulnerabilities: chronic poverty, development deficits, lack of effective investment, and other impacts of decades of conflict. The humanitarian response was crucial in preventing the collapse of basic services, but it could only help maintain (or substitute for) systems that are crumbling and in desperate need of investment. With the 'transitional' scheme of support failing to materialize as envisaged and without clear development prospects, the concept of the 'triple nexus' linking humanitarian, development, and peace agendas lacked real-world application in Afghanistan.
269. The evaluation concludes that funding restrictions need to be eased to allow essential technical cooperation and support to basic service systems in line with the recent independent assessment of Afghanistan for the UN Security Council.¹⁶⁷

Topic-specific conclusions and lessons

System preparedness, transition and scale-up

270. The dramatic shift of the aid agenda in Afghanistan after 15 August 2021 – involving a change in both function and scale of humanitarian response relative to development assistance – raises several lessons for the aid sector as a whole and the IASC in particular. These include the need for greater readiness in a context of potential political or security transition, the response to which currently tends to be reactive and ad-hoc. This includes *situations of potential regime change and/or descent into generalized armed conflict*.¹⁶⁸ More specifically, the lessons from Afghanistan concern planning for the consequences of suspension or withdrawal of development cooperation and the role the humanitarian system may need to play in case of economic collapse, generalized insecurity or potential system failure (Finding 3B). In essence, **the IASC should take a more proactive approach to deteriorating situations.**
271. With regard to scale-up and transition, lessons from the humanitarian response in Afghanistan include the change needed in the human resource profile, the need for organizational flexibility, and the ability to support a radical shift of strategy and operations. The evaluation found that the humanitarian system in Afghanistan struggled to scale up and re-orient its strategy in the last quarter of 2021 and faced the familiar challenges of shifting from a developmental to a humanitarian 'mindset'.

167. Report delivered in November 2023 by Special Coordinator Feridun Sinirlioğlu pursuant to UNSC Resolution 2679 requesting the Secretary-General to provide the Security Council an independent assessment on Afghanistan. The recommendations of the report are still under discussion by the UNSC.

168. Besides Afghanistan, this includes (historically) contexts like Myanmar, Syria and South Sudan. While the outcomes from such political and security transitions cannot be predicted in detail, the consequences of potential withdrawal of development cooperation can be largely predicted. While not all such contingencies are foreseeable (e.g. coups d'états), most do not occur overnight but are preceded by a period of political instability and insecurity.

272. The evaluation highlights two particular issues concerning scale-up and strategic transition. The first is that simply scaling up existing programme elements may miss the point. Humanitarian priorities and the vulnerability profile may change significantly as the situation evolves, as with the ‘new’ urban caseload in the Afghanistan case. The second is the need for re-appraisal of partnerships and partner support needs in contexts where local partners may be particularly vulnerable to policy and security changes while at the same time carrying greater response burdens.

Principles, protection, human rights, engagement

273. Some of the defining questions for the humanitarian response in Afghanistan since August 2021 have been ones of principle and related policy: most pressingly, how to respond to the increasing official restrictions and denials of the rights of women and girls. This has been a source of disagreement and division within the HCT. As the Afghanistan case shows, individual agencies will ultimately reach their own conclusions about how to proceed in such cases based on their mandates, their interpretation of the principles involved, the demands of the context and the willingness of donors to support them.

274. The inability of the HCT to agree on joint ‘red lines’ and the question of operational suspension in this case, illustrates the differences of perspective. As the direct involvement of the ERC, IASC Principals and EDG shows, this is an area where a high premium was placed in attempts to find convergence and agree on collective positions (particularly across the UN agencies), to avoid damaging splits in the humanitarian system and to demonstrate unity of purpose to the Taliban and donors. This was only partly successful. While a united front was rightly presented on the issue of principle concerning the essential role played by female Afghan staff, divergent approaches were taken in practice. The decentralized approach to engagement yielded positive outcomes (including negotiated exemptions and improved access) but made it difficult to maintain a unified position across the sector (Finding 6F).

Reconciling the humanitarian and human rights agendas

275. The apparent clash between humanitarian and human rights agendas in Afghanistan – which lay behind many of the tensions noted above – appears to have been less one of principle and more one of strategy and incompatible approaches. This was reflected in divergent views over engagement with the DfA and whether to suspend programmes in reaction to Taliban edicts affecting women and girls including aid staff. The evaluation concluded that a general suspension would have been contrary to the humanitarian imperative and would probably have been ineffective in changing policy. This issue needs consideration case by case, although where the humanitarian imperative applies and can essentially be fulfilled, there should be a general presumption in favour of continuing aid provision. The evaluation proposes some criteria for such decisions (Box 6 above) and suggests that this needs further guidance from the IASC.

276. Some of the divisions on this issue relate to a lack of clarity on the outcomes involved. The evaluation found that the humanitarian implications of the bans and restrictions on the freedoms of women and girls were poorly articulated. It concluded that the Protection Cluster needs to provide a clearer articulation of the Protection agenda (Finding 4K) and this needs to underpin an overall protection strategy, which is currently lacking.

Centrality of protection

277. Protection has been predominantly perceived as a sectoral activity rather than as the collective responsibility of the entire system. The protection implications of the programme and funding decisions may be masked as a result (Finding 4L). For example, the reduction in funding for food security

and the subsequent reductions in rations risked intensifying the livelihood crisis and prompting an increase in harmful coping strategies, including child marriage and child labour. The integration of protection analysis into the response remains weak, and its relationship with AAP should be more clearly recognized.

Accountability, community involvement and fiduciary control

278. The evaluation found that Accountability to Affected Populations (AAP) had not been strong over the evaluation period and the system took too long to establish robust collective mechanisms (Finding 5A). The AAP Strategy for 2023-2024 represents a step forward, but the proof of this will be in the implementation of the strategy. More generally, the evaluation found that local ownership – and specifically community involvement in the design and oversight of programmes – was limited. While local civil society bodies play an essential bridging role, the working environment for many is challenging and often hostile, especially for women-led organizations.
279. Community consultations for this evaluation highlighted concerns about perceived bias in beneficiary selection by community representatives (Finding 5C). This suggests the need for alternative forms of community consultation and more consistent monitoring by implementing agencies.
280. Major incidents of aid diversion in Ghor and Daikundi highlighted problems of fiduciary risk management for aid providers in Afghanistan. The evaluation was unable to reach firm conclusions on the nature and extent of misappropriation across the country. However, it noted that systems of AAP and post-distribution monitoring did not appear to provide an adequate basis for managing such risks.
281. The evaluation concluded that the HCT should review its risk management oversight and accountability processes, which were found to be relatively weak. Regular review and reporting against a few key collective indicators would help to enhance accountability and give focus and purpose to data collection and analysis.

Food security, livelihoods and cash

282. The combination of large-scale food assistance with scaled-up livelihoods and agricultural support has been essential to helping households meet immediate needs and providing a livelihoods 'bridge' for farmers and others. In the medium to longer term, rural and urban livelihoods depend on deeper investment, the recovery of labour and other markets, and the growth of other potential income sources. The current aid model does little to address this.
283. Further investigation is warranted on the differential impact of providing food assistance to rural and urban/peri-urban populations (including the impacts of food-in-kind vs. cash/vouchers), the effects of ration cuts since early 2023, and the provision of support to the agricultural sector on an unusually large scale. Community feedback suggests that cash support is particularly valued for its flexibility (Finding 5D). Although using cash/vouchers to support food security and livelihoods is partly dependent on market conditions, the evaluation suggests its relative proportion in the FSAC aid mix could be higher than the 30 per cent found over the evaluation period (see s.4.11). The use of cash has also formed an important part of the programme mix in other sectors, coordinated through the inter-agency Cash Working Group. However, the evaluation could not assess the collective impact of such interventions.

Health and Nutrition

284. The evaluation found that the health system's fragility, together with high levels of health risk, decreasing humanitarian resources, and limited bilateral/development funding, raises major concerns for sustainability and possible further deterioration of the situation (Finding 4E). The combined humanitarian and basic needs (HER) response has played an essential role in reducing public health risk (e.g., through vaccinations, risk communication) and providing access to health-care. However, the health system remains critically vulnerable.
285. The Nutrition response is based on health system structures, and is highly dependent on the latter's strengths and weaknesses. Risks associated with decreasing funding affect both sectors.

Gender, Education, Protection

286. The Afghanistan context involves particularly extreme gender disparities, and these are legally enforced with official oversight. The evaluation found the education in emergency response was dwarfed by the scale of need and constrained in its ability to address the main challenges to access (Finding 4L). The overwhelmingly adverse impact of keeping girls out of secondary school and university is the dominant concern, but lack of access to quality education is a more general problem. As with WASH, the educational aspects of the crisis cannot easily be framed in standard humanitarian or 'emergency' terms.
287. The overall protection agenda has been heavily constrained by the policy environment in Afghanistan (Finding 4J). In some cases, relating to gender and human rights, DfA policy is the cause of the protection issues. In other cases, the institutional and political climate is not conducive to progressing issues such as GBV and child protection. Progress has been possible in some areas – notably mine action and HLP –because of the relatively apolitical nature of the agendas concerned. The sector needs an overarching strategy and clearer guidance on applying the 'centrality of protection' principle.

Coordination and multi-sector and programming

288. Although joint planning between directly related sectors (e.g., food security and nutrition) strengthened over the evaluation period, genuine multi-sector programming was far less evident (Finding 4M). One of the obstacles to this appears to have been the discrepancies in funding levels between different sectors, suggesting an advocacy priority with donors. Overall, the evaluation concluded that multi-sector planning and implementation were a growing priority, given the compound nature of risks facing vulnerable Afghans.
289. Given the adverse conditions within which it was working, the evaluation found the response was relatively well coordinated. The Cluster system was extended quite effectively beyond Kabul to regional level, and most Clusters performed well. However, recruitment and funding issues left some posts unfilled at Provincial level (Finding 4M). Inter-sector coordination through the ICCT is reported to have worked well, but practical collaboration between sectors was patchy and limited to bilateral agreements between lead agencies.

Operational support issues

290. Current DfA practice concerning the signing of MoUs for all programme components severely impedes the work of humanitarian NGOs (Finding 6G). This was the issue raised most frequently with the evaluation team by NGOs, as an obstacle to the delivery of vital services. Informants

stressed the importance of the UN (and OCHA in particular) prioritizing this as an advocacy agenda with the DfA and ensuring that the proposed reforms are introduced and delivered. They also emphasized the importance of the humanitarian system supporting and not undermining the work of local NGOs in this regard, particularly that of women-led NGOs; and of understanding local dynamics and the stake that the authorities have in community-level structures.

Evidence, outcome and performance indicators

291. The evidence base for the response strengthened considerably over the evaluation period – and became more ‘granular’ and geographically specific – but remained patchy and often inadequate, with problems relating to the way in which programme performance and outcomes are assessed and reported. This reflects more system-wide issues. The effects of aid are too often assumed with too little known about the role aid plays at household and community levels, or its broader impacts on markets and at population levels. The evaluation concludes that the ‘diagnostic’ component of the response must go beyond the standard needs assessment and monitoring approaches if it is to answer deeper questions about relevance and impact. New forms of impact analysis may be required using contextual data, as well as economic and behavioural research techniques. This is a necessary supplement to the more generic measures such as IPC classification, which plays a vital role in overall forecasting and trend analysis but is affected by so many variables that it cannot be relied on as an outcome indicator in relation to aid inputs.
292. The evaluation made several related findings concerning the use and interpretation of indicators (Finding 4A). These include the need for a clearer distinction between *outputs* and *outcomes*, the often-misleading use of indicators like ‘reach’, and the need to understand the *consistency of delivery over time* as essential to gauging the benefit provided by aid. Differences between various agencies’ internal planning and monitoring systems make consolidating results within the HRP Cluster framework difficult, and work is needed to harmonize these systems.

RECOMMENDATIONS

293. The following recommendations relate to the topic-specific conclusions and lessons identified above. Some of these have system-wide implications, and the related recommendations are therefore addressed to the IASC and related global forums as well as to the Afghanistan HCT. Of the recommendations addressed to the HCT and Clusters, the evaluators note that some are already the subject of current work streams. In these cases, the evaluation's findings can be understood as a validation of ongoing efforts as well as suggesting particular priorities for attention.

Recommendation 1: Ensure readiness planning for high-risk countries

294. [IASC/EDG] **In collaboration with development partners, create a global, regional, and country-level support framework for financing and implementing flexible readiness plans in countries at significant risk of fast-paced developmental failures and broad collapse of critical services.**

295. Joint IASC/EDG/HCT readiness planning must be considered a priority in any complex political emergency or other high-risk situation in which there is potential for 'adverse' regime change or descent into generalized insecurity or armed conflict in the short-term (within 6-12 months). Ensuring the continuity of critical services and support to food security should be a priority. Planning should allow for a *potential radical shift of aid strategy* and scale up of the humanitarian and basic needs agendas relative to the development agenda – including the possible general suspension of development cooperation. It should focus on enabling strategic re-orientation and operational scale-up, including flexible funding mechanisms that can resource rapid adjustment of development and humanitarian priorities.

296. Such planning should be triggered by the IASC, EDG, HCT, and UNCT's own analysis of likely political and security outcomes. It should include preparation for potential System-Wide Scale-Up Activation, including adaptable leadership and coordination frameworks, and it should involve global Clusters as appropriate, to allow planning of potential support to the country team. Readiness planning should be considered a global priority for the humanitarian system, and responsibility for this should be shared with the in-country HCT. This might require establishing global/regional planning teams to support and augment in-country planning. Given the likely political sensitivities around planning for the kinds of scenarios involved, this may require 'closed door' and confidential processes.

297. [IASC] **Systematically engage the bilateral and multilateral donors and IFIs to support readiness plans for high-risk countries.**

298. While some donors are engaged in country-level discussions on preparedness, there needs to be an appropriate forum at the global level. Such a forum could help define the funding modalities more clearly and allocate responsibilities for funding humanitarian aid and basic needs programmes. Establishing regular dialogue with donors and International Financial Institutions around specific high-risk countries would enable more thorough planning and better harmonized responses to crises involving development failures and threats to critical services. This dialogue should prioritize the integration of innovative financing mechanisms—such as forecast-based financing and insurance solutions—into traditional funding models, aiming to create a more adaptable and resilient funding strategy for humanitarian efforts.

Recommendation 2: Resource and harmonize the ‘basic needs’ agenda

299. [HCT, IASC] **Continue to advocate with donors to ensure comprehensive planning and resourcing for a ‘basic needs’ agenda that complements the humanitarian response, recognizing the critical importance of sustainable support for essential services.**
300. A collaborative investment strategy engaging bilateral and multilateral donors is required, including in the Afghanistan case, the Gulf states, the EU, the World Bank, and the Asian Development Bank. Extending the use of existing multi-partner trust funds, with robust oversight and reporting mechanisms, should be explored to secure this sustainable funding.
301. [HCT] **Support to essential services, whether under a ‘basic needs’ rubric or otherwise, must be harmonized with the humanitarian response, with the related roles and responsibilities of each made clear. As far as possible, support for basic services should be planned on a multi-year basis, subject to the discussions with donors proposed in R.1.2 above.**

Recommendation 3: Operationalize Humanitarian Principles and Protection Strategy

302. [IASC] **The IASC should agree on a more predictable approach to operationalizing humanitarian principles within politically sensitive and complex environments.**
303. Delineated criteria for when programme suspension is warranted should be included, guiding the HCT on effectively navigating constraints while maintaining the principles of neutrality, impartiality, and independence. Besides questions of programme suspension, further guidance from the IASC is needed on the interpretation of the humanitarian imperative and the relationship between the humanitarian and human rights agendas.
304. [HCT, Protection Cluster] **Establish an integrated protection strategy that clarifies the relationship between humanitarian and human rights agendas and the centrality of protection.**
305. This should address policy edicts, including barriers to girls’ education and restrictions on female aid workers. The strategy should set out approaches and common guidelines for effectively engaging with and influencing de facto authorities. It should establish clear protection priorities across Clusters, and specify the roles of key stakeholders to facilitate strategic dialogue with the de facto authorities and the international community. In doing so, it should clarify the application of the ‘centrality of protection’ principle and promote more stronger harmonization of approaches to policy edicts and access negotiation.

Recommendation 4: Strengthen Accountability and risk management

306. [HCT] **Establish a mechanism to monitor and review reported incidents of humanitarian aid diversion or other abuses and develop measures that may need to be taken collectively to reduce exposure to fiduciary risk.**
307. [HCT] **Establish a framework of key collective performance indicators to be reviewed and reported on quarterly.** This should include a combination of the main programmatic progress indicators by Cluster together with outcome indicators (e.g., food security, acute malnutrition levels, GBV levels) and process indicators (risk management, advocacy, etc.). The related process should be light, conducted through existing inter-Cluster mechanisms and dovetailed with existing processes.

Recommendation 5: Evolve CASH, WASH and Shelter Programmes

308. [FSAC, Cash Working Group] **Explore ways to expand the cash component of their responses to maximize programme efficiency and value transfer to beneficiaries. Harmonize this with the cash components of the other sectors' responses.**
309. [Cluster Lead Agency WASH; Shelter] **Invest in more sustainable approaches in WASH and Shelter responses.**
310. In the case of WASH, this will require advocacy with donors for a significantly scaled-up and reconfigured response, combining humanitarian and 'basic needs' (system-related) support. For Shelter, donors should establish a multi-year 'basic needs' funding stream to allow more sustained investment in transitional shelter.

Recommendation 6: Improve evidence, outcome and performance indicators

311. [HPC Steering Group, GCCG, Cluster Lead Agencies] **Develop better methods to assess the delivery of aid benefits over time, including the consistency of aid delivery and its contribution to addressing vulnerabilities.**
312. This should include harmonizing of the use of 'reach' and coverage through shared metrics across Clusters, exploring ways to focus on outcomes of collective sector responses instead of aid delivered.
313. [HPC Steering Group, GCCG; HCT, Afghanistan Clusters] **Find better means to understand the role played by aid, within and between sectors,** including exploring the use of alternative social and economic research techniques to understand the utility and impact of specific aid interventions at the household level.

Areas for learning

314. In addition to the recommendations above, the evaluation identified multiple opportunities for areas of learning that could provide valuable lessons for the ongoing response in Afghanistan and for humanitarian responses worldwide.

A. Engagement: [IASC/HCT] Consolidate the humanitarian system's learning on dealing with de facto authorities in settings where international political engagement is limited or absent and where regular development cooperation is impossible. Include lessons from instances of temporary aid suspension due to aid diversion. Review the cost-benefit of the IASC monitoring framework in Afghanistan.

B. AAP: [Afghanistan AAP WG/IASC AAP Taskforce] Evaluate the Afghanistan AAP Strategy. As part of this evaluation, the mechanisms for community consultation should be reviewed, particularly in light of the difficulty identifying genuinely representative individuals and forums at the community level, and the increasingly challenging context for local civil society.

C. Cash: Undertake a more general cross-sector review of the use of cash in the humanitarian response to assess the potential for expansion, particularly of multipurpose cash.

D. FSAC: Review the results of providing large-scale food assistance to rural and urban/peri-urban populations and the differential impact of each, including the impacts of food-in-kind vs. cash/vouchers and the respective market effects of providing food-in-kind and cash/vouchers.

E. FSAC: A lesson-learning exercise on providing early, large-scale support to the agricultural sector would benefit both the Afghanistan response and the humanitarian sector.

ANNEXES

- Annex A** The scaled-up funding response in numbers
- Annex B** The Joint Operating Principles
- Annex C** The bans on female Afghan staff
- Annex D** Community Consultation report
- Annex E** Expanded sector analysis
- Annex F** Evaluation Matrix
- Annex G** Evaluation Methodology
- Annex H** Terms of Reference
- Annex I** List of reference documents
- Annex J** List of Key Informants interviews
- Annex K** Field mission itinerary