# **Introduction**

High-level risks will have been reflected on as part of Step 1 Sub-step 8 within the context analysis, however, during the programme design and planning, the programme team will now be much clearer as to what approach and components of the rental assistance programme will be adopted, and on the overall objectives of the programme. This risk analysis and mitigation planning will be specifically about the designed programme.

To undertake this sub-step it can be useful to work or consult with a wide range of internal stakeholders (shelter, livelihoods, CEA, PGI, finance, logistics etc. colleagues) and consider involving external stakeholders (such as community representatives as appropriate). In the majority of responses there is not a specific *risk delegate*, however in very large IFRC responses there can be.

Some of the information below is taken from [IFRC (2020) Step-by-step guide for rental assistance to people affected by crisis](https://cash-hub.org/resource/step-by-step-guide-for-rental-assistance-to-people-affected-by-crisis/) , step 2, sub-step 1.9 and reproduced here for completeness.

Tools and examples from the toolkit, that may be useful to assist here include:

* 2.1.9\_Tool\_Programmatic\_Risk\_ Register\_RentalAssistance .xlsx
  + Although this template is based upon the IFRC Operational Risk Template, it can also be used at a programmatic level. It is quite a detailed risk register template.
* 2.1.9\_Example\_Risk Management plan UAImpactedC\_RentalAssistance.docx
  + Example that illustrates how different risk registers relate to each other in a larger operation and the overall framework of risk management in a big operation.
* 2.1.9\_Example\_RiskAssessment\_SK\_RentalAssistance.xlsx & 2.1.9\_Example\_RiskAssessmentNarrative\_SK\_RentalAssistance
  + Both examples from 2022-2023 Ukraine response in Slovakia

# **Recommended process**

1. Discuss with operational leadership if there is a specific format for creating a risk register and the process for how risks identified at a programmatic level should feed into any higher-level operation wide risk registers or country or regional level operation risk registers. See: 2.1.9\_Example\_Risk Management plan UAImpactedC\_RentalAssistance.docx , which provides an example of how risk registers relate to each other in a wider operation.
2. Try to identify and list out critical external factors and risks[[1]](#footnote-2) related to your programme - see annex A for examples.
3. As part of this, if useful, a Strength, Weaknesses, Opportunities and Threat (SWOT[[2]](#footnote-3)) analysis can be undertaken for the programme that is being designed. The Threats and Weaknesses section specifically can contribute to items on the risk register.

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| **Strengths**   * NS has delivered Cash and Voucher Assistance (CVA) previously and has a range of potential transfer mechanisms. * There is some absorption capacity in the rental market for a rental programme, due to the time of year and the low tourism demand. * Etc. | **Weaknesses**   * We are only able to support a small number of households that require rental assistance. * Even with targeting only those with more realistic exit strategies there will still be a number who may not be able to appropriately exit the programme when the supported rental period ends. * Etc. |
| **Opportunities**   * Government supports the Shelter Cluster (coordination forum) and there is a rental working group where the RC can play a leading role in defining rental assistance programming standards, helping to showcase the RC and bring in additional funding for this initiative. * There could be potential to tie the programme into the governments normal social protection system which provide rental support for specific groups. However, changing legislation may take time and not be in the host country’s economic interests. * Etc. | **Threats**   * While it is expected that tourism demand for rental accommodation will take several months to recover, when it does, property owners may not extend tenancy agreements or worse may seek to issue no-fault evictions. * There are also vulnerable members in the host community, and the host community may believe that all support is going to the displaced. Social tensions may rise if the programme is not delivered appropriately. * Etc. |

1. Populate your risk register.

See: 2.1.9\_Tool\_Programmatic\_ Risk\_Register\_RentalAssistance.xlsx

If you choose to adopt a simpler template the key items to consider for each risk are:

* Risk description
* Additional controls to be put in place (mitigations)
* Risk owner (e.g. Rental Programme Manager)
* How the risk will be monitored

1. When considering your potential mitigations spend time considering what is practical, how will it be achieved (what resources, what changes to the programme are required) and who will take responsibility for the mitigation (normally the same team that is responsible for the risk).

The Examples from 2022-2023 Ukraine response in Slovakia in the toolkit are a useful resource: 2.1.9\_Example\_RiskAssessment\_SK\_RentalAssistance.xlsx & 2.1.9\_Example\_RiskAssessmentNarrative\_SK\_RentalAssistance

# **Annex A – Example of risks and mitigations related to rental programming**

There are many common risks related to rental programming which can be summarised as follows:

## **Rental Market**

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| **Example Risks** | **Example Mitigations** |
| Discrimination and bias against target population or specific vulnerable groups. | Property owner hesitancy workshops  Rental guarantees  Deposit support |
| Market inflation resulting in negative impact on host community. | Do not support rental payments above median rent for area.  Consider small grants to property owners to bring unfinished buildings/sub-divide large rooms to increase rental stock. |
| Affected population are charged higher rates than host community and may incur additional costs above the advertised rental rate. | Do not support rental payments above median rent for area.  If property owners are doing this because of perceived risk, consider the NS providing rent guarantees or paying for insurance for property owners to mitigate this risk. |
| Affected people lack information about the rental accommodation market, including pricing and availability. Reducing access to market and risk of exploitation. | Produce a rental market and practices leaflet. Publish on website and social media, and print leaflets for distribution at humanitarian service points (HSPs) regarding |
| Property owners or service providers who do not usually pay tax on property and become liable because of rental assistance programme, potentially putting them at financial risk and decreasing their willingness to rent. | Advocacy with national government to exclude “new” rentals from rental income taxes for a defined period (e.g. 6 months) |

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## **Access to adequate housing**

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| **Example Risks** | **Example Mitigations** |
| Services in neighbourhoods targeted by rental assistance are overburdened. | Raise issue in coordination forums and request humanitarian agencies that support local authorities and educational, health and other services to work in area. E.g. in Lebanon one humanitarian agency provided additional garbage trucks to municipalities.  Complementary programming (e.g. Health programming). |
| Available rental accommodation does not meet agreed quality standards. | Consider small grants to property owners to improve standard of rental accommodation.  Consider a move-in/upgrade grant paid to tenants which can assist household to undertaken basic repairs directly (e.g. fit new more secure locks on doors) with property owners consent. |
| Lack of adequate accommodation for people with specific needs | Employ staff with occupational health background in programme. Work with property owners and tenants to make adaptions through the provision of a small adaption grant for property owners.  Specifically support these vulnerable groups with searching support to find possible accommodation options that meet their needs. |
| Households do not spend cash assistance on rental costs due to other priorities. | Conditionality (e.g. tenancy agreement to be submitted) prior to transfer of rental payment.  Assist household to access multi-purpose cash programmes. |

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## **Protection, Gender and Inclusion**

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| **Example Risks** | **Example Mitigations** |
| Lack of available accessible properties for older people and people with mobility impairments. | Employ staff with occupational health background in programme. Work with property owners and tenants to make adaptions through the provision of a small adaption grant for property owners.  Specifically support these vulnerable groups with searching support to find possible accommodation options that meet their needs.  Work with local authority to find buildings that can be brought into use to support those with ground floor accommodation for those with mobility impairments. |
| Increased security risks for households as a result of cash assistance. | Stagger batches of payments to tenants.  Use an appropriate transfer mechanism that minimises risk to household. |
| Exploitation and abuse by property owners. | Monitoring and follow-up / casework with each tenant household.  Hotline. |
| Forced eviction and tenure insecurity. | Roles and responsibilities meeting with property owner and tenant to avoid future issues.  Mediation support  Monitoring and follow-up / casework with each tenant household.  Hotline |
| Disruption to existing coping mechanisms - such as informal hosting - as a result of rental assistance | Host assistance programming, to reduce hosting household fatigue.  Targeting and selection criteria. |
| Fraud and collusion between property owner and tenant. | Do not pay over median rental market price.  Occupancy checks and visits. |
| Social tension and conflict as a result of humanitarian assistance and increased presence of displaced households. | Monitor social tension  Include vulnerable host community households meeting eligibility criteria or specific criteria for host community within rental assistance programme and publicise this. |
| Property owners evict households at end of programme on assumption they will be unable to continue paying. | Support tenants with livelihood programming.  Work with tenants and property owners to support relationship especially towards the end of the supported rental period. |
| Illegal land and property acquisition to benefit from cash assistance. | Undertake some basic due diligence to establish true owners of property being rented.  Monitoring of issue. |
| Households move out before the end of the programme. | Agree with property owner in advance that we will work with them to place and support another vulnerable household for the supported rental period. |
| Households are unable to pay rent at the end of the programme and have no alternative longer-term housing solutions. | Support tenants with livelihood programming.  Support tenants with exit strategies more generally through casework. |
| Women are unable to sign or agree rental contracts for cultural, or legal, reasons. | Work with property owners, property owner associations, community representatives, local authorities and civil society to overcome this barrier.  If necessary, agree contracts with RC directly and then sub-let to women headed household. |

There are many example risks and mitigations in addition to those highlighted here.

1. An assumption describes a risk as a positive statement of the conditions that need to be met if the intervention is to achieve its objectives. The risk, “the security situation gets worse”, can be written as the assumption, “the political and security situation remains stable”. Risks are often identified during the initial assessment stage and restated as assumptions during the design of the logframe. Based on IFRC, Project/Programme Planning, Guidance Manual, 2010. [↑](#footnote-ref-2)
2. SWOT analysis, is a matrix analysing the Strengths Weaknesses, Opportunities and Threats, for further information refer to IFRC, Project/Programme Planning, Guidance Manual, 2010. [↑](#footnote-ref-3)