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## The Afghanistan Humanitarian Access Working Group (HAWG)

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Summary of recommendations for humanitarian partners vis-à-vis the Ministry of Economy's Guidance on the Responsibilities of Provincial Economic Director  
Guidance Note

### Dissemination

This guidance note is intended for wide dissemination among humanitarian partners, including National and International non-governmental organizations (NGOs), the Humanitarian Country Team (HCT), the Inter-Cluster Coordination Team (ICCT), and other relevant coordination forums at the national and sub-national levels.

### Background

In October 2023, the Ministry of Economy (MoEc) released guidance 'on the responsibilities of provincial Economy Directorates and NGOs' in an effort to clarify the operations of non-governmental organizations and enhance transparency in alignment with provincial-level projects. The document has become one of the key documents with which MoEc frames its engagement with the humanitarian community.

Given the range of issues the document covers and potential impact they could have on adherence to humanitarian principles, it is important that humanitarian partners collectively have clarity on how the guidelines should be approached.

### Objective

This document aims at supporting humanitarian partners with first-line guidance on how to approach each of the articles when referenced by DfAs during regular engagement and programmatic implementation. It is envisaged that this document will form the basis of the humanitarian community's engagement with DfAs on the 22 articles.

### Overarching Principles

Engagement and negotiations to manage potential issues arising from the MoEc guidance should adhere to humanitarian principles and ensure staff and their dependents are protected.

In cases where partners do not have the negotiating space to adhere to this paper’s recommendations, they shouldn't work independently, but should instead take the issue to the relevant coordination forums or their relevant cluster to agree on a way forward.

**Key summary recommendations**

- Humanitarian partners, clusters, and other coordination fora should ensure re-emphasizing the humanitarian principle of operational independence governing humanitarian interventions.
- Humanitarian partners, clusters, and other coordination fora should ensure re-emphasizing the aims of humanitarian programming in terms of saving lives and alleviating suffering and clarify the distinction with development and political pillars. The people centered approach to programming should be continuously stressed.
- Humanitarian partners should ensure maintaining distinction between their own assessment and monitoring activities and those undertaken by the DfAs.
- Clusters should increase their coordinated engagement with relevant ministries to explain how programme and support costs are calculated as per international standards, including admin costs and fluctuating exchange rates, in order to pre-empt possible bureaucratic delays and interferences during implementation.
- Humanitarian partners should re-emphasize to DfAs that they are accountable to the affected communities and donors to promote and ensure financial efficiency of projects and programmes and to solely make all recruitment-related decisions based on this consideration.

	<b>Ministry of Economy (MoEc) Guidelines</b>	<b>HAWG recommendations to humanitarian partners</b>
<b>1</b>	<i>Donors must prioritize societal needs, sectors, and sustainable goals before announcing their projects and give them due consideration</i>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners should restate <b>their independence to the De facto Authorities (DfA)</b> vis-à-vis donor agendas, including that proposals to donors systematically rely on assessment results as well as the organisation’s mandate.</li> <li>▪ The High-Level Forum (led by the Humanitarian Coordinator) at the national level and the Provincial Coordination Forums (Led by OCHA) should endeavour to present the Humanitarian Needs and Response (HNRP) priorities on annual basis when the document has been finalized. This should also apply for any revisions to the document throughout the year.</li> <li>▪ Humanitarian partners should present and discuss <b>priorities and needs with relevant DfAs</b> both at the national and provincial levels during coordination and engagement meetings. Unless new priorities emerge and amendments are endorsed by donors regarding funding agreements, no deviations from agreed upon projects are permitted. However, clarifications pertaining to the separate humanitarian/development funding instruments should be made by partners, and during different collective engagement meetings by HCT members, clusters, ACBAR, and OCHA among others, including donors’ guidelines under each, and the limited funding availability particularly for development interventions.</li> </ul>

		<ul style="list-style-type: none"> <li>▪ During presentations to sectoral ministries for project approvals, reference should systematically be made to independent needs assessment conducted by humanitarian partners in coordination with the relevant DfAs and the selection criteria as per vulnerability and available resources, the centrality of accountability to the affected population, community consultations as well as how the project contributes to responding to the expressed needs of targeted communities and how it will engage women through women whenever feasible - in a culturally appropriate manner. Partners should systematically reference the humanitarian principles and joint operational principles endorsed on 21 December 2022, in particular operational independence. Wherever relevant, reference to sectoral ministries strategies and plans to underline strategic coordination efforts to respond to the needs of the Afghan people can be underlined.</li> </ul>
2	<p><i>Oversight of projects carried out by NGOs at the provincial level, should align with the needs and priorities of that specific province</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners should ensure full compliance with the MoU/authorization letter signed with sectoral ministries to ensure smooth oversight of projects in line with commitments made to donors, DfA as well as affected communities. Humanitarian partners should pay attention to close coordination with provincial authorities to pre-empt interferences during project implementation.</li> <li>▪ In case of monitoring exercise or visit, from NGOs own Monitoring, Evaluation, Accountability, and Learning (MEAL) teams, donors or third parties, each monitoring should be done strictly separately from the ones conducted by the DfA (e.g. monitoring actors cannot share facilities or interview recipients jointly, and if possible, exercises should be conducted on separate date and time and with clear communication to beneficiary to avoid confusion. Exceptional care should also be taken to ensure the safety of women recipients).</li> <li>▪ Humanitarian partners develop projects in response to needs independently assessed by humanitarian organizations, adhering to humanitarian principles.</li> </ul>
3	<p><i>Projects undertaken by NGOs should yield results corresponding with their costs</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian Partners and Clusters, should increase their coordinated engagement with relevant ministries to explain how programme and support costs are calculated as per international standards, including admin costs and fluctuating exchange rates.</li> <li>▪ Clusters should endeavour to clarify to DfA that program salaries constitute a program cost to both MoEc and the line ministry.</li> <li>▪ Humanitarian partners are expected to implement as per the costs indicated in their donor agreements as well as approved projects on the MoEc registration portal, that prioritises cost efficiency in all project implementation.</li> </ul>

		<ul style="list-style-type: none"> <li>▪ MoUs already outline the main budget lines. Humanitarian partners are advised not to share detailed budget information beyond the main items in the MoU. Detailed budget information should not be shared with provincial DfAs and any requesting entity should be directed to MoEc.</li> <li>▪ Whenever submitting reports, humanitarian partners should endeavour to demonstrate the results of their projects quantitatively and qualitatively.</li> </ul>
<p><b>4</b></p>	<p><i>NGOs must secure Sectoral Departments approval and be verified by Economic Directorates at the project's conclusion and this document be added in their semi-annual reports, as well. Six monthly reports, along with supporting documents, should be submitted through the online registration system to the Ministry of Economy. Reports without written approval from line Directorates are not acceptable</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners should submit all relevant documentation to MoEc through their online registration portal. All questions asked by MoEc should be addressed in a timely manner in order not to delay project implementation. Provincial DoEcs should not create delays in the signature of biannually reports. Prior to launching projects in the chosen locations, humanitarian partners are expected to sign a MoU with the relevant line ministry, and to conduct coordination and engagement meetings with the DfA representatives of the concerned project implementation location, to explain the purpose and scope of the project, and to pre-empt challenges during project implementation.</li> <li>▪ For multi-sector projects, the MoEc should acknowledge and accept that one approval letter is sufficient based on the signed MoU for all sectors.</li> <li>▪ Humanitarian partners should continue engaging, where possible and at every given opportunity, with the respective DfA representatives during project implementation as a way of providing updates on project implementation to pre-empt any unnecessary questions and delays as well as to enhance understanding of the project.</li> <li>▪ Reporting obligations must be met by said organisations, while upholding humanitarian principles and Joint Operating Principles (JOPs) endorsed in December 2022 and the protection of staff and beneficiaries. Requests by line ministries, the General Directorate of Intelligence, and other DfAs entities for data that fall under data protection protocols and data protected by the JOPs must not be agreed to. This includes and is not limited to: staff lists or identifiable information- These can only be provided to the ministries of Labor and Social Affairs and Finance as part of the work permit process<sup>1</sup>, mahram lists, and beneficiary lists. Please refer to HAWG guidance on beneficiary lists with DfAs, from April 2024 for more detailed support and any specific guidance related to the safeguarding of women both staff and beneficiaries. Such information requests by DfA representatives should be reported directly to the regional and national access coordination bodies.</li> </ul>

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<sup>1</sup> Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.

<p><b>5</b></p>	<p><i>NGOs cannot proceed with projects without memorandum of understanding (MoU) signed thru line Ministries and an introduction letter from Supervision and Evaluation Directorate of Ministry of Economy. This Economy Directorate must also acknowledge receipt and coordinate the process. Failure to adhere to these procedures will be deemed arbitrary, leading to project suspension by Ministerial Authority</i></p>	<ul style="list-style-type: none"> <li>▪ As reconfirmed by the Minister of Economy during the 5 March 2024 meeting with humanitarian partners, emergency projects with a duration of less than 6 months do not require MoUs but should be coordinated with the MoEc and relevant DoEcs.</li> <li>▪ Humanitarian partners are obliged to submit all relevant documents to MoEc through the online registration platform, to obtain an introduction letter to the provincial DfA of the concerned locations for project implementation, prior to any start of activities.</li> <li>▪ Humanitarian partners are also required to hold a coordination and engagement meeting with the DfA of the province (s) and district(s) concerned by project implementation, to ensure that the DfA are aware of the activities to be implemented.</li> <li>▪ Should issues arise during the pre-implementation coordination meeting, humanitarian partners should flag these impediments to their donors and relevant coordination bodies as appropriate and strive to pre-empt possible issues during implementation that may lead to interference or suspension.</li> <li>▪ In cases of delay, humanitarian partners cannot implement projects without direct approval from local DfA and in coordination with national entities.</li> </ul>
<p><b>6</b></p>	<p><i>NGOs are obligated to collaboratively resolve project-related issues with sectoral institutions and the Directorate of economy as needed and on time</i></p>	<ul style="list-style-type: none"> <li>▪ As above, with escalation measures when the issue cannot be solved locally, humanitarian partners should reach out to their national-level office when relevant, coordination bodies, and/or donors when appropriate, and the concerned Ministry at national level for resolution of the conflict/issue.</li> <li>▪ To the extent possible, all issues should be documented in writing with the DfA to ensure sustainability of the resolution in case of turnover in DfA representatives and be shared with the national-level office and/or front donor as relevant and appropriate.</li> <li>▪ Access impediments affecting project activities for women to access women if not resolved locally should be raised with relevant coordination bodies, HAWG and country offices.</li> <li>▪ Humanitarian partners must ensure the adequate representation during engagement with the DfAs at the provincial level to match seniority level and ensure consistency in messages.</li> </ul>
<p><b>7</b></p>	<p><i>Issues arise at provincial-level during projects implementation should be resolved through Provincial Development Council (PDC), and through the sectoral meetings under it, while unauthorized committees interfering in NGOs activities are disbanded.</i></p>	<ul style="list-style-type: none"> <li>▪ The PDC is a general development forum, making it unsuitable for specific issues related to a project or partner. The Provincial Humanitarian coordination Forum is more appropriate for discussing humanitarian issues.</li> <li>▪ Humanitarian partners should strive to pre-empt issues during coordination and engagement meetings with the relevant DfA entities at local level prior to project implementation. And, during implementation, continue to address any issues that arise as well as provide updates to the DfA entities.</li> <li>▪ However, should project-related issues or interferences occur on the part of the DfA, humanitarian partners are expected to enhance their engagement with the DfA to come to principled resolution of</li> </ul>

		<p>conflict that prioritizes the humanitarian principles and safeguarding of humanitarian staff and beneficiaries, whether directly or with the support of a facilitator (access coordination bodies as a preferred option). Timely sharing of issues is key to build trust with the DfA and ensuring transparency in aid delivery and implementation.</p> <ul style="list-style-type: none"> <li>▪ Severe issues faced by humanitarian partners at the local level with DfAs and putting humanitarian principles under pressure must be escalated to the coordination bodies urgently to avoid pressure by authorities.</li> <li>▪ If necessary, the issue should be escalated to Kabul-level office for support and guidance on next steps. Any interference attempts by other committees should be reported directly to the regional and national access coordination bodies (RAWGs and HAWG).</li> </ul>
<p><b>8</b></p>	<p><i>NGOs must refrain from engaging in ethnic, racial and political activities</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners are reminded to abide at all times by humanitarian principles to ensure the principled implementation and delivery of assistance in all locations. In particular, humanitarian partners can recall the principle of neutrality, according to which humanitarian partners will not take part or side of any controversies of a political, religious or ideological nature. At the same time, humanitarian partners can also recall the principle of impartiality, according to which humanitarian assistance is guided solely by needs and without any discrimination according to gender, ethnicity, religious or political affiliation.</li> <li>▪ In case of dilemmas or issues arising during implementation linked to this point, humanitarian partners are required to timely inform their donors first, and then access coordination bodies for support and guidance.</li> </ul>
<p><b>9</b></p>	<p><i>NGOs should consider infrastructural indicators and the country's public interests in their project's implementation</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners are to implement projects as per their donor agreement and signed MoUs, which translate humanitarian needs into activities. These activities are based on findings of assessments and surveys that inform the humanitarian response and are part of the HNRP. No other considerations other than assessment and survey findings should influence the implementation of humanitarian response. All humanitarian projects must also adhere to do no harm principles including safeguarding staff and beneficiaries.</li> <li>▪ The humanitarian response by definition is intended to save lives, alleviate suffering and maintain human dignity during and after man-made crises and disasters caused by natural hazards, as well as to prevent and strengthen preparedness for when such situations occur, and is therefore limited in time and scope. However, all humanitarian partners whether with a sole humanitarian mandate or</li> </ul>

		<p>with dual humanitarian and development mandate, should strive to ensure an exit strategy in all projects towards resilience of the affected population as per global commitments of the aid sector.</p> <ul style="list-style-type: none"> <li>▪ MoEc assured in a meeting with OCHA in October 2023 that they will inform their provincial level departments on the distinction of humanitarian, development, and political pillars to limit such requests to humanitarian partners which are beyond their mandates.</li> <li>▪ Humanitarian partners to sustain efforts aimed at sensitization of local DfAs on the distinction of humanitarian, development, and political pillars.</li> </ul>
<b>10</b>	<i>Workshops, seminars, and gatherings organized by Donors and NGOs require coordination and approval from the Ministry of Economy, both in Kabul and at the provincial level</i>	<ul style="list-style-type: none"> <li>▪ Project-related activities, including workshops, seminars and specific gathering are already included in the MoU that is signed with the relevant line ministry and then a copy of that MoU is also submitted to MoEc for the introduction of the project to the provincial directorates.</li> <li>▪ In case of workshops, seminars or gatherings outside of specific project activities, or part of regular activities of the organisation, or coming up on an ad-hoc basis to discuss specific operational or policy matters, no specific coordination or authorisation should be sought with the MoEc. Humanitarian partners are encouraged to continue to organise workshops and other types of gatherings as per current coordination practices which entail facilitating the participation of all and in an inclusive location, without prior mention to the DfA, which may prevent the participation of specific groups, including women.</li> </ul>
<b>11</b>	<i>NGOs cannot employ an individual in multiple projects simultaneously unless the allocation of the employee's salary across projects is transparent.</i>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners should not share confidential and identifiable information on recruitment processes with the DfA to guarantee independence as well as data protection, beyond provisions contained in the HAWG guidance note on sharing sensitive staff information dated 25 February 2024 that can be shared with MoEc when an official request is made.</li> <li>▪ Humanitarian partners must sensitize DfAs that it is against operational principles to employ individuals across multiple projects while paying them a full salary under each.</li> </ul>
<b>12</b>	<i>Transparent hiring practices are expected, with priority given to qualified Afghan nationals, whenever possible, foreign employee recruitment should be minimized.</i>	<ul style="list-style-type: none"> <li>▪ As per localisation commitments as well as recruitment policy and standards, priority is given to qualified Afghan nationals, both women and men, whenever suitable. However foreign employees will be recruited whenever required and as per i) needs and technical expertise, ii) decisions from Senior Management Teams, iii) rules internal to these organizations.</li> <li>▪ Humanitarian partners are accountable to the affected communities and donors to ensure the financial efficiency of projects and programmes and make their recruitment decision based on this consideration.</li> </ul>
<b>13</b>	<i>NGOs cannot include office rent as an expense in each project.</i>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners are expected to charge office-related costs under percentage adequate with project size and total budget for said project- except when an office is only needed under one project. Total rent amount should be distributed across all projects, without duplication. Humanitarian</li> </ul>

		<p>partners should keep records of rent payments, in case of audit and as per their rules and regulations contained in donor agreements.</p> <ul style="list-style-type: none"> <li>Refer to the letter dated 21 January 2024 from the MoEc on clarification regarding paragraph 13 of the circular #250/166 dated 6 June 2023. It includes: <i>the purpose thereof is 100% charging of office rent (in projects) and charging office rent in percentage in projects is excluded from this paragraph.</i></li> </ul>
14	<i>During logistics, transportation, and construction contract processes, NGOs must invite Ministry of Economy representatives as observers.</i>	<ul style="list-style-type: none"> <li>Humanitarian partners are expected to carry out contracting processes in complete transparency vis-à-vis their donors, and as per donor’s policies and requirements and relevant DfA line ministry. However, in order to safeguard operational independence as well as data protection and internal standard policies, humanitarian partners should not give in to DfA pressure to have DfA members sitting or participating in these processes and refer to any future HAWG Guidance note on the subject.</li> <li>Humanitarian partners are expected to inform their donors and access coordination bodies of any attempt from the DfA (whether at national or provincial level) to have a role in contracting processes, for further support and guidance. Recognising added pressure on NNGOs, reports made from NNGOs to ACBAR directly should be communicated from ACBAR to the HAWG without delay, for adequate guidance and support to be provided in a timely manner.</li> </ul>
15	<i>Oversight of NGOs offices falls solely under the purview of the Ministry of Economy. Any institution within the Islamic Emirate seeking to oversee NGOs offices must coordinate with the Ministry of Economy.</i>	<ul style="list-style-type: none"> <li>As per verbal feedback received from MoEc in October 2023, this article highlights that MoEc is the entry point for coordinating the humanitarian response, and other DfA bodies seeking information should not engage directly with NGOs but rather address their questions to the MoEc.</li> <li>MoEc remains the direct line ministry for NGO project implementation. NGOs have reporting obligations to MoEc as per provisions contained in the Procedure on regulation and coordination of NGOs (October 2022). NGOs are also expected to coordinate with sectoral DfA from MoU approval stage the implementation of sectoral activities, however this technical coordination does not include oversight of NGO offices.</li> <li>Therefore, all requests from entities other than MoEc or Directorates of Economy (DoEc) must be referred to the latter, and NGOs should inform their relevant focal point within these entities. Such requests can entail visit to compounds, requests for staff lists or information with regards to staff salaries.</li> <li>Once requests are channelled by MoEc or DoEc, humanitarian partners must refer back to available guidance and ensure the demands are met in line with humanitarian principles and relevant policies (e.g. on staff information, interference attempts in recruitment or implementation, or beneficiary lists).</li> </ul>
16	<i>All NGOs property belongs to national treasury. NGOs must not transfer movable</i>	<ul style="list-style-type: none"> <li>NGOs can opt to share with MoEc the inventory of assets pertaining to on-going or completed projects. However, requests for transfer of assets to the DfA (whether national, provincial, or local),</li> </ul>

	<i>or immovable property to Emirati or non-Emirati entities or auction it without Ministry of Economy coordination and guidance.</i>	<p>should not be entertained as it may entail legal liability. As per verbal feedback received from the MoEc in October 2023, this article intends to ensure NGOs avoid purchasing assets with each new project, but instead reuse assets from completed projects in new ones, while informing the MoEc of such practice.</p> <ul style="list-style-type: none"> <li>▪ The transfer of assets is outlined in the grant agreements between the partner and the donor. There is no obligation to transfer them to the DfA.</li> </ul>
<b>17</b>	<i>NGOs must provide all necessary facilities for project and organizational monitoring and evaluation to the Ministry of Economy's monitoring team.</i>	<ul style="list-style-type: none"> <li>▪ NGOs are not expected to provide any material support to DfA personnel for monitoring purposes and should not provide financial support, or incentives, to them. This includes the provision of per diem, or other benefits regardless of their nature. The DfA may conduct their own monitoring of NGO activities (as reflected in paragraph 12 (Article 4, Chapter 2 that indicates that it is mandatory for sectoral authority to “monitor and control project implementation in accordance with the MoU”) but these monitoring visits should be done on the condition that such monitoring is carried out separately, and it does not require resources from NGOs. In case of in-house monitoring via NGO MEAL staff, or in case of third-party monitoring, these visits should strictly be done separately and independently from the DfA monitoring visits, if possible, on separate date and time and with clear communication to beneficiary to avoid confusion.</li> <li>▪ As per oral feedback received from the MoEc, MoEc highlighted that they pay per diem and provide transportation to their staff while conducting monitoring, so NGOs are not expected to do so. They encouraged partners to report such requests.</li> </ul>
<b>18</b>	<i>All NGOs must share the precise locations of their central and provincial offices with the central and provincial authorities.</i>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners can opt to share office addresses with national and provincial DfA from MoEc, if requested and when safe to do so. Any request from other entities should be referred back to DoEc as per point 15.</li> </ul>
<b>19</b>	<i>Establishing field offices at the provincial and district levels requires a letter from the Ministry and coordination with the directorates of Economy.</i>	<ul style="list-style-type: none"> <li>▪ To limit administrative and staffing costs, new offices should be established only when absolutely needed as per agreements with donors, and in coordination with local DfA to ensure acceptance and relationship building.</li> </ul>
<b>20</b>	<i>All NGOs must register projects and relevant documents in the Ministry of Economy's online system for visa</i>	<ul style="list-style-type: none"> <li>▪ NGOs should comply with relevant registration processes pertaining to MoEc. In case of technical delays in completing the online application, NGOs are required to undertake the necessary follow-</li> </ul>

	<p><i>applications, customs exemptions, vehicle license plates, and telecommunications equipment, and process their due processes.</i></p>	<p>ups in a timely manner with their focal points in the Ministry to avoid delaying project implementation, and to reach out to their donors for support and awareness.</p> <ul style="list-style-type: none"> <li>▪ In case women led organisations face additional impediments in registration, they are encouraged to reach out to the Gender in Humanitarian Action (GiHA) forum.</li> </ul>
<p><b>21</b></p>	<p><i>Head and executives of NGOs residing outside the country must have physical presence in the country. Effective from the issuance of this letter, all executives and heads of NGOs should return to the country. Upon expiry of this deadline, if the above-mentioned officials of NGOs have not return to the country, the executive board has the responsibility to elect the head and other executives official of NGO in coordination and in presence of the MoEc representative. If the aforementioned advice is not adhered to, the NGO will be directed to dissolution.</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners’ leadership staff, unless faced with exceptional circumstances, should reside in Afghanistan, in order to provide the appropriate leadership and support to staff operating in offices and in the field, to support meaningful and timely engagement with the DfA, and provide the accountability required of management roles.</li> <li>▪ As advised above, humanitarian partners should not permit the presence of DfA officials in any election processes to ensure independence and avoid unnecessary influence.</li> <li>▪ Women-led organizations facing these issues due to their exceptional circumstances are advised to raise the issue to GiHA who in turn might opt to mobilize the humanitarian leadership.</li> </ul>
<p><b>22</b></p>	<p><i>NGOs are required to open bank accounts for all employees in Kabul and provinces. Districts and villages without banking services are exempt from this requirement.</i></p>	<ul style="list-style-type: none"> <li>▪ Humanitarian partners are expected to pay employees through bank transfers in areas where such facilities exist. Humanitarian partners who are currently paying employees by cash payments are encouraged to progressively discontinue this practice throughout 2024 if they operate in areas where banks are functional and accessible, with the support and guidance of their donors. However, there should be a degree of flexibility, such as consideration for alternative methods like hawala in areas where the banking system is dysfunctional.</li> <li>▪ In many cases where organizations have not been able to officially register their women staff or face blockages by the Ministry of Finance in opening bank accounts/obtaining TIN, organisations have been using cash transfers. Women also have less access than men to bank accounts in Afghanistan. Flexibility should therefore be considered for such cases.</li> </ul>