

Housing, Land and Property (HLP) challenges in Rohingya response: rental increase, security concerns and forced eviction

Policy briefing paper on housing land and property (HLP) in the Rohingya response
ICLA, November 2023

Executive summary

Housing, Land and Property (HLP) rights centre around having a place to live, free from the fear of forced eviction, a place that offers access to safe shelter, secure livelihood opportunities and basic services, even if it is in a camp far from home in the country of origin. If cross-cutting issues, like HLP, are not addressed from the very outset of a humanitarian response, it will undermine the objectives of the entire response, excluding the most vulnerable individuals. However, failing to realise HLP rights not only further exacerbates the socio-economic vulnerability of the community, but also exposes the affected population to further protection risks prevalent in camps.

Starting from the 1970s and leading up to the 2017 influx, 2024, marks the seventh year in the most recent Rohingya refugee crisis in Bangladesh. This protracted phase of the response now requires more structural support to ensure preventing and redressing recurrent HLP rights violations. This includes:

- HLP standards should be mainstreamed in all sectoral priorities, guaranteeing minimum due diligence compliance prior to establishing any service point.
- Subsidiary cash, voucher assistance (CVA) assistance should be considered for the most vulnerable (e.g. female headed, the elderly etc.) living on private land.
- The land tenure administration and rental market should be regulated at the same pace of opening livelihood and working opportunities for refugees in camps.

This briefing note is developed by the Information, Counselling and Legal Assistance (ICLA) programme of the Norwegian Refugee Council (NRC). ICLA is a legal aid programme providing a comprehensive approach to support individuals and communities to navigate complex legal, administrative, and civil issues in humanitarian contexts. As of November 2023, the ICLA programme of NRC in Bangladesh is operating in 22 camps across several thematic areas, including legal identity documentation (LID), access to essential services (AES) and Housing, Land, and Property (HLP) rights; addressing tenancy rights, rental disputes, evictions, ownership issues and other HLP-related concerns.

This paper on the housing, land and property (HLP) environment in the Rohingya refugee camps is compiled based on ICLA's field-based experiences and extracts of standard tools, mapping, trackers, and assessments completed during 2022-3. The assessment covered both the Ukhiya and Teknaf areas, targeting HLP incidents raised and responded to in 21 camps, up to the end of

October 2023. This advocacy note is developed to provide an overview of challenges around security of tenure for refugees in camps, to inform operational decisions and illustrate strategic priorities of the response, according to the needs, regularly identified at field level.

Background: HLP challenges in camps for Rohingya refugees

There are severe protection gaps and concerns in the Cox's Bazar camps in Ukhiya and Teknaf, home to approximately 970,000 Rohingya refugees. These are specific to the access and exercise of HLP rights, particularly in Teknaf, where most of the camp boundaries overlap with private property. Access to land tenure, and rental agreements, have led to rising tensions among host and refugee communities, including evictions, conflict and forced relocations. This briefing note will identify and assess protection risks resulting from the gaps in HLP rights and describes priorities for a response strategy.

Living in the densely populated camps in Ukhiya and Teknaf brings many HLP issues for the Rohingya and host community (HC). According to ICLA's regular assessments in 2023, the most notable HLP challenges during this period are **disputes over rental issues, forced evictions, and disputes over public and shared resources**.

As well, a concerning number of refugees have to relocate due to security threats. Although the trend of eviction remains steadily increasing in 2022 and 2023, the significance of the underlying factors has changed in this context.

In 2022, the main factors for forced eviction were rental increases and imposing arbitrary rents. During 2023, security threats, as a result of territorialisation claims by armed and militant groups, came to play a leading role in forced eviction.

Violence and security incidents inside the Cox's Bazar Rohingya refugee camps have risen since the beginning of 2022.¹ This has raised protection concerns for Rohingya refugees, including exposure to general and physical insecurity, child-related protection concerns, and gender-based violence (GBV). Lack of livelihood and educational opportunities compound these protection issues, as do severe funding cuts² that drive concerns over food insecurity, exacerbating the situation for the Rohingya refugees. This has led many refugees to undertake dangerous sea journeys to reach other countries, for example Malaysia or Indonesia.

- **Type of lands – land tenure structure in place**

The land situation in camp area remains complicated, unverified and challenging, contributing to the vulnerability of an already devastated refugee community. The land that is allocated for settlement of Rohingya refugees is mostly overlapped with private lands in the Teknaf area and user rights for individuals - on forestry lands in Ukhiya. In the current phase of this protracted Rohingya crisis in Bangladeshi camps, the host community, who are one of the poorest communities in the country, have started collecting rent in these two areas. There is also a shift of

¹Crisis Mounts for Rohingya Refugees in Bangladesh, International Crisis Group, 6 December 2023.

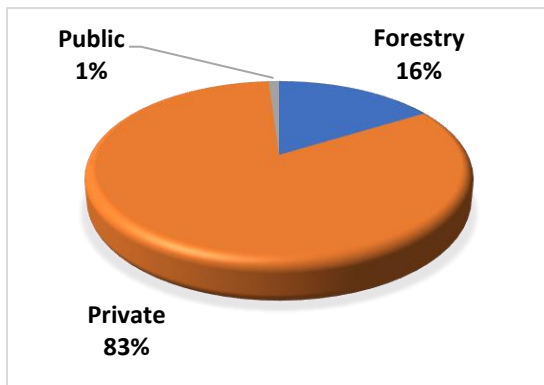
<https://reliefweb.int/report/bangladesh/crisis-mounts-rohingya-refugees-bangladesh-enbnmyzh>

² Including the World Food Programme cuts from USD12 to 8 per person per month in 2023. Starting 1 January 2024, WFP will increase the food ration to USD10 per person per month, and gradually add locally fortified rice to its food assistance package. <https://www.tbsnews.net/bangladesh/wfp-increase-food-ration-us8-us10-all-rohingya-refugees-coxs-bazar-767210>

dynamics in some camps: for example, in Camp 22, the host communities are seeking to earn an income through renting.³ Failing to establish a regulatory framework for special areas in camps is leading to arbitrary claims by the host community, forcing refugees to relocate to other areas, which may be unsafe and prone to flood, waterlogging and landslides.

The allocation of about 26 square kilometres (6,425 acres) of forest land in Bangladesh for Rohingya refugees,⁴ in accordance with Section 27 of the Forest Act of 1927, which grants the government the authority to cease the reservation of forest land, could potentially serve as a legal framework for such allocations. However, the inclusion of private land within the refugee camps without differentiating it from forest land has complicated matters. Host community members, including private landowners and people involved in social forestry and claiming ownership, are now charging arbitrary rents, leading to further disputes and legal challenges.

In Teknaf, the area fenced for Rohingya refugee relocation has limited private land, leading to settlement in risky, flood-prone areas or high-rent land without proper agreements. This situation created housing challenges and disputes with the host community. Landlords are increasing rents and imposing harsh conditions, adding pressure on the relocated Rohingya. The government's construction of barbed-wire fencing without substantial consultation with refugees, host communities, or aid agencies raises concerns about territorialism and tension. Post-relocation, refugees face resource shortages, leading to conflicts over shared facilities like water and latrines, further strained by the fence's impact on access to essential services.



Graph 1. Land allocation in camp area (private, forestry and public)

Analysing ICLA's 2023 caseload of 481 households dealing with HLP challenges in 21 camps, concludes that 83 per cent of the cases are raised on private land, 16 per cent are on forestry lands and only 1 per cent on public lands.⁵ Comparing these to the previous year's data (2022), where 93 per cent of HLP issues were raised on private land. This signifies the increase of HLP concerns for both private and forestry/ public lands.

³ Section 28A of the Forest Act 1927, regarding Social Forestry in Bangladesh, prescribes establishment of social forestry programmes on government-owned lands. This section provides for written agreements granting rights to land use for social forestry purposes. The agreements don't need registration for government-owned lands, and rights under such agreements cannot be overridden by subsequent assignments. The section also mandates rules for equitable benefit sharing, management plans, and transfer of rights, highlighting the government's commitment to sustainable forest management involving local communities. This approach offers the host communities residing on or near forest lands an opportunity to participate in and benefit from the management and conservation of these resources, fostering community involvement in environmental stewardship.

⁴The Rohingya Influx: One-Year-On, ISCG, 26 Aug 2018: accessible at: <https://reliefweb.int/report/bangladesh/rohingya-influx-one-year>

⁵ Public land denotes all land owned by the Government of Bangladesh (GoB), including its agencies, and allotted for a specified public use. Public land may also be allotted for large-scale development projects implemented under public-private sector partnerships.

- **Evolving issues**

Following the 2017 influx, accommodating the large number of refugees in Cox's Bazar sub-districts adjacent to camps led to many housing, land and property (HLP) challenges. The key drivers of these issues are rooted in the lack of in-depth consultations with the community at the time of settlement, and the short-term and temporarily envisioned approach for the response in the area. Right after the Rohingya displacement, refugees were sheltered on forest, public and private land. Initially, the attention was primarily directed towards settlement itself, leading to oversight of HLP issues such as one-time lumpsum payment to the host community landowner. However, gradually challenges have arisen in different forms between the communities. For example, the host community started to charge regular and monthly rental fees to refugees, and after establishing rental arrangements, the lack of documenting payments has often led to more tension among the host and refugee communities. Furthermore, there has been a lack of due diligence in establishing shared and public resources, which has led to difficulties and denial of access to these services.

During the initial phase of the Rohingya refugee crisis, host community landowners were more inclined to receive one-time payments rather than collected monthly rents. This preference reflected the uncertain and fluid nature of the situation. However, in 2021, two significant incidents led to large movement in the camps. The first was the installation of barbed wire fences in May 2021, which forced more than 800 households to move into different camps. Among them, 370 households moved into camp-marked areas in camps 24 and 25. The second incident followed the announcement of the completion of the camp on Bhasan Char. *Majhis* started to engage in the selling and buying of land parcels for vacated land plots and this acted as a push factor' to convince more people to relocate to the island; some *Majhis* appeared to benefit from the relocation scheme, for example, by accepting bribes for relocation and selling the vacated land parcels. This dynamic is still present in 2023, and as of October 2023, a new wave of people, approximately 500 individuals, were relocated to Bhasan Char.

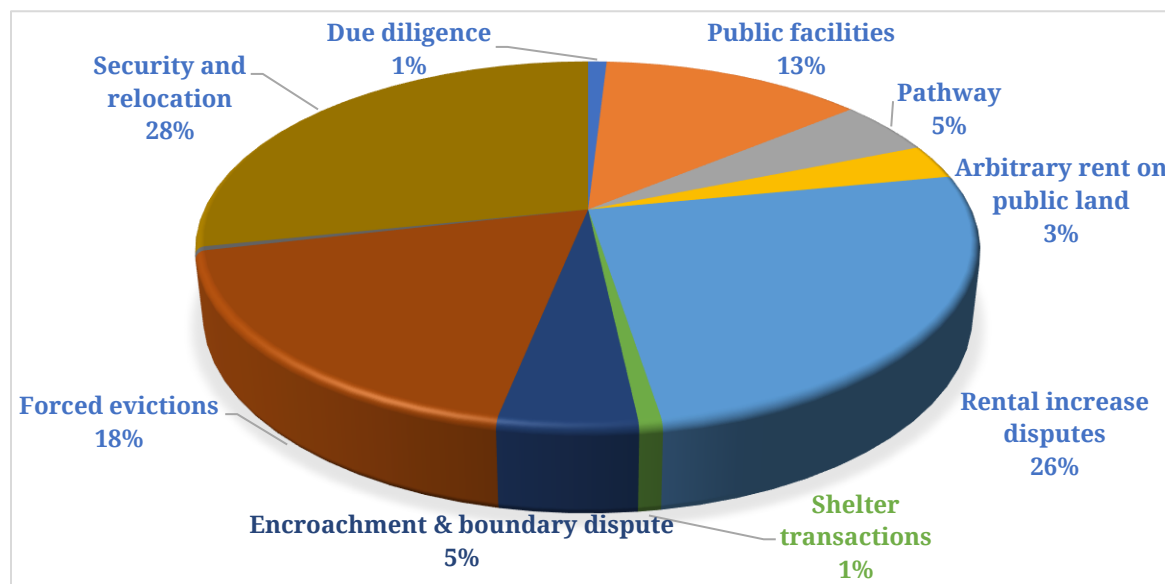
The HLP major trend in 2023 is interlinked with the worsening security situation in camps and its impacts on deteriorating conditions of security of tenure for refugees. Similar to the previous last two years, the main drivers for eviction and relocation cases were rental increases and setting arbitrary rental arrangements. In 2023, the security concerns become more visible, resulting in pushing people out of their shelters, to try to find new shelters in other camps where they have relatives, or in camps they consider safer. Based on the regular NRC assessments conducted in 12 camps, theft and looting of property was the leading reported HLP violation from the beginning of 2023 up to the end of October 2023. Since 2017, approximately 60 per cent of the crimes and security incidents in camps, took place during 2022 until April 2023. Since 2021, the number of clashes between armed groups or gangs and Bangladeshi security forces have increased, peaking within less than four months in 2023. ACLED (Armed Conflict Location and Event Data) data also revealed a similar but still increasing trend for violence against civilians⁶ and international crisis group report on December 2023 highlighted multiplying number of armed gangs and heated

⁶ ACLED accessed 31/04/2023.

competition among them.⁷ Crimes such as murder, kidnapping, rape, robbery, human trafficking, arson and the illicit drug trade have soared in the Rohingya refugee camps in recent periods.⁸

- **Range of issues refugees and host community facing in camp areas.**

The leading factor for HLP issues in 2023, at 28 per cent, were related to security concerns initiated by armed gangs and militant groups active in the area. These armed groups are engaged in criminal activities and are pushing people out of their shelters either through forceful attempts for recruitment (to the gangs) or by causing life-threatening actions due to ongoing clashes for gaining territorial control. The second most frequent issue is rental increase with 26 per cent, both for private and public lands. Following the rental increases, forced evictions, at 18 per cent, are identified as another key challenge forcing refugees to seek relocation due to the deteriorating security of tenure.

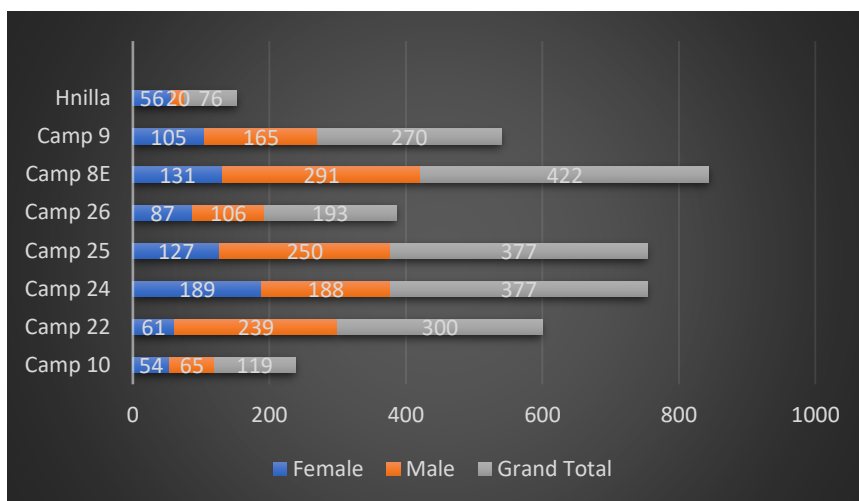


Graph 2. Percentage of diverse HLP disputes that Rohingya and host communities are dealing with in camps January-October 2023

⁷ Crisis Mounts for Rohingya Refugees in Bangladesh Crisis Group, Asia Report N°335, 6 December 2023. <https://www.crisisgroup.org/asia/south-asia/bangladesh/355-crisis-mounts-rohingya-refugees-bangladesh>

⁸ (Reuters 24/01/2023; The Daily Star 13/12/2022). <https://reliefweb.int/report/bangladesh/bangladesh-rising-violence-insecurity-and-protection-concerns-coxs-bazar-refugee-camps>

During 2022, camps 25, 9 and 10 were identified as the camps with the most frequent number of HLP issues across the board, whereas in 2023 the main affected camps by the end of October, were camps 25, 24 and 8E. There has been a consistent trend of key prominent HLP issues in the last two years, which include forced eviction, rental disputes and disputes over public and shared resources. Among host communities, the Hnilla union is the one reported with the most frequent HLP challenges.⁹



Graph 3. Most affected areas in camps and host community with HLP issues

a. Rental disputes

Many of the Rohingya refugees must now pay rent to the host community to continue access to land for shelter. These tenure arrangements are often undocumented and unregulated. The absence of tenancy documentation and regulation of the rental market leaves Rohingyas vulnerable to arbitrary rental price increments and increased risk of forced evictions. Most of the refugees who are living in public lands are usually paying a lump sum amount on an annual basis, to people claiming use rights on lands. Those who are living on private lands are mostly paying the rent on monthly basis. Setting and collecting rental arrangement periodically, causes further protection concerns for more vulnerable Rohingya families.

Case study: rental dispute

The landowner on forestland gave an eviction threat to the household. She [the Rohingya refugee] had been paying BDT300 per month to the landowner for the last 14 months. Prior to this monthly arrangement, she had paid another lump sum amount of BDT4,000 for this specific land parcel. However, there was no document between the parties certifying the issue. ICLA staff managed to successfully negotiate an extension period with the landowner, who said that he needed the land back for his private use. After extension of the notice period, ICLA supported for alternative housing and the safe relocation of the household.

Ukhyia, Private land

During the last two quarters of 2023, due to severe ration cuts, refugees are dealing with even more pressure for securing their shelter. Whereas in previous periods, they were able to sell some of the items to pay in lieu of their rental cost; for many this is no longer an option. Many families

⁹ In Teknaf, the Hnilla union stands out among host communities for frequent Housing, Land, and Property (HLP) issues. This is largely due to the presence of camps 24, 25, 26, and 27 with mixed private and public lands in this area.

who have been living in camps since 2017 find themselves unable to pay and are faced with eviction threats. To avoid eviction, they have started paying rent to landowners on private lands or claimants of public and forestry lands with in-kind items, for example oil, soap, sugar, onions.

Case study: In March 2023, a landlord, in a camp in Teknaf, increased the monthly rent of more than 80 families from BDT100 to BDT300-500. ICLA staff successfully provided their collaborative dispute resolution (CDR) intervention to avoid eviction and rental increase.

It is worth noting that the allocation for the public, private and forestry land in different camps varies. In Teknaf, most of the land parcels in camps 24, 25 are private and belong to the host community. However, in camps 26 and 27 a much smaller percentage of land is privately owned.

Monthly rent ranges between BDT350 to BDT700 in camps, for both forest or private land is charged by landowner or host community with use rights.

Identification of the nature of land (whether public or private) does not necessarily determine whether refugees pay rent or not. NRC piloted a rental mapping exercise in camps 24 and 25 in the first quarter of 2023. According to this assessment, some specific sub-blocks in Camp 24 (e.g., A-1, A-2, B-3, B-4 and C-1, C-2, and C-3) are considered as forest land, where refugees can live free of charge. However, in the same camp, refugees who are living in the forest land in other sub-blocks (e.g., D-1, D-2, D-3, and D-4), are paying monthly rental charges ranging from BDT400-600 per month. In other sub-blocks that are partially forestry and private (e.g., E-3, E-4 and F-1 and F-2), the rental fees range from BDT350-700 per month.

In Camp 25, which is also composed of private lands and partially private and forestry lands across all the sub-blocks, all the people living in different sub-blocks were found to be paying rent, with no significant difference between these two sets of sub-blocks (private and forestry). For instance, in sub-block D-1 and D-2 the range of rents are BDT300-400, while in sub-block D-6 and D-7 the range is BDT350-700. Since all the blocks in D area are private lands, in D-22 and D-23 this rental amount goes up to BDT800. In sub-blocks D-25 and D-26 the rental charges oscillate between BDT300-800, while land in these areas is partially forest and private.

b. Shared resources and encroachment, boundary, and pathway disputes

Example: dispute over public facilities emanating from lack of due diligence

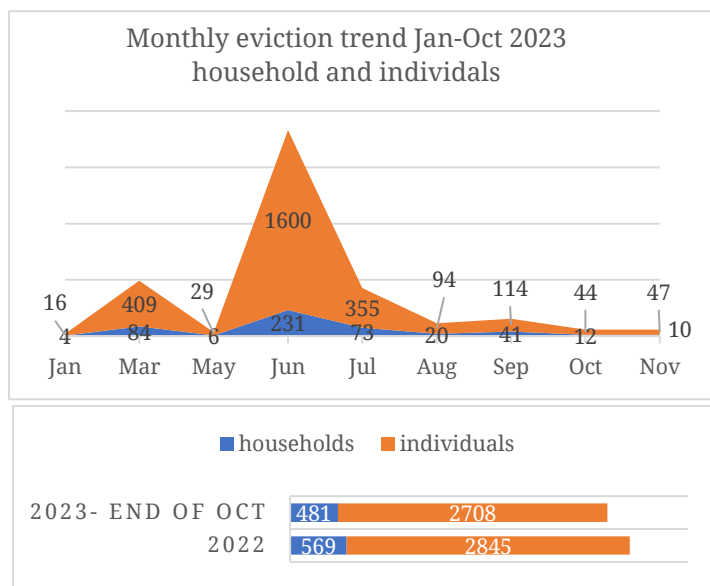
A host community member in a Ukhiya camp, was verbally teasing three families and preventing them to use the latrine allocated to their sub-block. By claiming ownership on the land plot, the claimant is asking for money in return for use of the public facility.

In the Rohingya refugee camps in Bangladesh, the struggle for access for shared resources, which include water points, toilets and communal spaces has intensified, leading to disputes and tensions. The refugee camps are severely overcrowded, with only 10.7 square metres per person. Cramped living conditions on small parcels of lands with common pathways and shared resources increases tensions within the refugee community. Failing to comply with due diligence standards at the inception of building shared resources has led and contributed to intersectional HLP issues, often leading to denial of access to services.

As the camp population grows, the demand on these limited resources increases and has at times resulted in encroachment, boundary and pathway disputes. For example, there have been instances where a host community landowner, block *Majhi* or relatives have prevented other residents from accessing communal water facilities. Additionally, host community landowners exert control over water resources, often demanding monthly rents for access, exacerbating the water scarcity issue. These situations not only restrict essential resource access but also fuel tensions within and between communities. Another example involved a case where the construction of a brick wall by a host community member resulted in blocked drainage, waterlogged shelters, and a tense situation between refugee and host community. Attempts for annexing the shared land parcel, pathways and gardening are also common sources of disputes among refugees living camps. Disputes over public facilities, such as a household struggling with annexed latrines, further illustrate the complexity of these conflicts. The elderly, people with disabilities and women are among the most vulnerable people suffering from the ongoing power dynamics in community; and are often forced to comply with unjustified claims or must relocate to alternate locations.

c. Evictions

The number of evictions in the last two years (2022-23) continues to be at the same level. Underlying challenges cause continuous eviction trends forcing people out of the shelter. Many of the refugees are facing secondary or multiple evictions, as they were not able to find a place secure to live in, for a long period. Access to HLP rights is fundamental to socio-economic inclusion of refugees and evictions are amongst the worst violations that jeopardise their stability, exposing them to further harm and limits their access to essential services.



Graphs 4 & 5: Eviction cases Jan-Oct 2023 and monthly trend of eviction

Three locations with highest number of evictions	2022		2023	
	Camp 25	464 Households 2,302 Individuals	Camp 25	305 Households 1,963 Individuals
Camp 24	61 Households 303 Individuals	Camp 26	86 Households 419 Individuals	
Camp 26	23 Households 107 Individuals	Camp 8E	14 Households 61 Individuals	

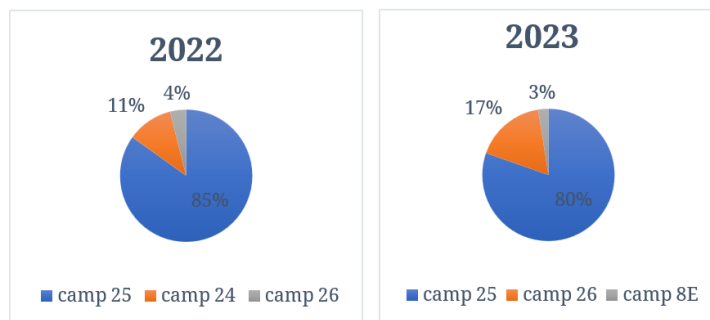
Graph 6. Three camps with the highest number of eviction cases

The camps in Teknaf are the ones most prone to eviction cases. In the last two years, camps 24, 25 and 26 faced the largest number of households and individuals with evictions due to mixed security of tenure arrangement in Teknaf.

Furthermore, in 2023, Camp 8E in Ukhiya also witnessed an increase in evictions. The key driver for the large number of evictions in 2022-23 are the influential host community landowners, who initiate eviction notices for many families at the same time. An example of such an incidence was reported in Camp 25 in October

2022 where over 400 households were affected and again in June 2023 in the same camp, when over 231 families were affected.

For the last two years (2022-23) the most affected camp by eviction was Camp 25. Camp 26 remains as one of the three most impacted camps by eviction cases consistently in last two years. The number of eviction cases in Camp 24 had a notable drop compared to last year, because of relocation of 300 number of households and solidifying their security of tenure arrangement with informal lease agreement in the camp during previous period in 2022. However, same approach was not successful in camp 25 due to presence of criminal gang in Hnila union in camp 25. In last two years there is an increasing demand to impose rent by user right holders for rental arrangement in camps 26 and 8E which leads to more eviction threats.



Graph 7. The most affected camps by eviction

d. Relocation application

The relocation of the Rohingya within Bangladesh's refugee camps is compounded by several other pressing issues, including escalating rental costs, significant and increasing security threats and acute land scarcity. Relocation is one of the leading requests of refugees living in camps; for some it is voluntary, but for most Rohingya refugees, it is not. Having difficult relationships due to rental increases, harassment and security concerns have forced the refugee individuals and households to leave their current location and search for alternatives. Moreover, failing to follow through with all the required bureaucratic procedures, including household registration and verification by both camps (departure and destination), results in deprivation of all the limited essential services available, including food and shelter. During the last two quarters of 2023, the number of self-relocations increased due to security concerns. There are also concerning reports indicating that individuals living in camps 8W, 9, 17, 16, and 25 were forced to move to other areas to temporarily stay with their relatives due to increased security and protection concerns/risks.

The implementation of barbed-wire fencing around the camps since 2021 has drastically altered living conditions. This fencing restricts movement and access to essential services and has forced those relocated to the fenced areas into even more confined, often overcrowded, spaces within the camps. Additionally, the limited availability of land inside the camps exacerbates the situation, as the Rohingya struggle to find adequate space for living. The arbitrary and often inflated rental demands imposed by landowners further aggravate their living conditions. These compounded challenges of security threats, rental hikes, limited land availability and arbitrary rents are driving the ongoing, complex relocation process.

The Norwegian Refugee Council (NRC) Information, Counselling, and Legal Assistance (ICLA) programme plays a pivotal role in ensuring that the relocation of the Rohingya refugees is

conducted in a structured manner and responsive to identified needs. This multifaceted process is planned, beginning with the detailed mapping of vacant land to identify appropriate relocation sites while carefully avoiding protected or reserved forest areas. ICLA's approach is designed to ensure a more organised and dignified relocation process. Focusing on the basic needs and rights of the displaced individuals, they aim to ensure that the relocated Rohingya communities can settle into their new environments with dignity and access to necessary resources, thereby facilitating a smoother transition into their new living conditions.

legal identity and civil documentation are closely linked to Housing, Land, and Property (HLP) interventions. Disputes on different issues within the household is common, which in turn leads to change in household composition requiring to separate shelter. The only way to secure further relocation in new shelter, is to have changes of family composition reflected in Family Attestation cards. Additionally, change in family structure due to events such as marriage, divorce, or the new-arrivals amount to issuing new cards or modification. Moreover, families who are facing eviction find themselves relocated to different camps. Upon relocation, it becomes crucial to update the details of information such as camp's name in their family attestation document to reflect the new living arrangement. NRC assist families by identifying new suitable vacant land or available shelters, conducting due diligence, resolving disputes, rental negotiation and facilitating informal rental agreements and securing civil documentation in different scenarios. Furthermore, after changing family composition like in case of marriage registrations, they may require additional documentation and shelter support, simultaneously.

e. Women and HLP issues

In the refugee camps in Cox's Bazar, women are one of the most vulnerable groups, often facing insecure tenure, encroachment, eviction and rental disputes. The social practice of *purdah* (veil) is strictly adhered to in the Rohingya community living in the camps. Adhering to *purdah* means women should not have interactions or show themselves to men who are not their relatives and so remain at home. These cultural practices also deprive women of participating

in the limited space of livelihood opportunities. Not being able to afford rent puts women, and women-headed households, in a precarious situation, and increases their susceptibility to be abused due to the imbalance of power and lack of protection. Women-headed families will often have to rely on their relatives, which does not necessarily guarantee the family members will act in their best interests. This also potentially escalates women's vulnerability to further ill-treatment and exploitation. These women-headed families in refugee camps face greater vulnerability in rental negotiations due to insecure tenure and limited work opportunities; they often end up paying high rents, despite limited income. Their challenges are also compounded during relocation, including finding new land, dealing with hostile landlords and navigating arbitrary rental negotiations. These households also struggle with accessing basic services and

Example: Overlapping of charging arbitrary rent and security concerns

Because of theft and harassment, a woman needs to move out of the rented shelter but the landowner forbids her to take the shelter material, claiming she has unpaid rent.

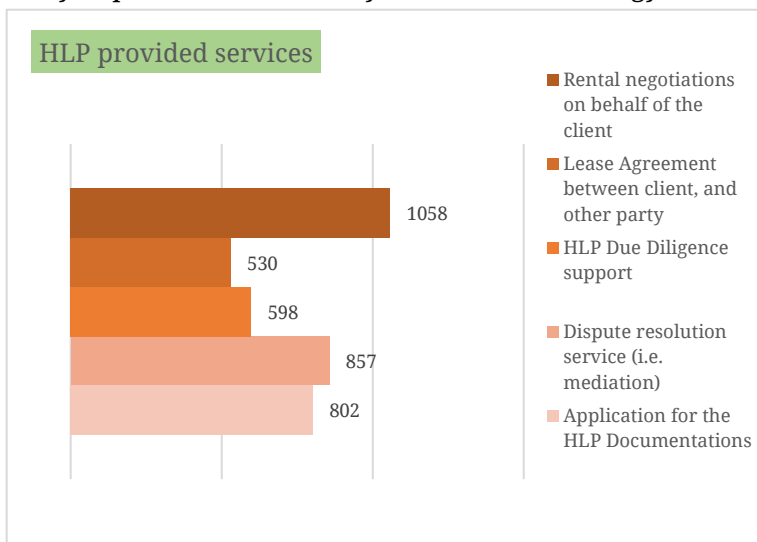
A case involving a female-headed household in Teknaf.

shared resources, further hampering their ability to lead dignified lives. The continued reliance on *Majhis* for land allocation within camps, can also further restrict their housing choices.

The barbed wire fences around camps raise serious concerns as it limits freedom of movement and access to essential services, further affecting these vulnerable populations, including their safety. The existence of fencing is a particular concern during any fire emergency, hindering access and evacuation.

- **ICLA housing, land, and property (HLP) related services**

HLP services provided by the ICLA team try to preserve the security of tenure for Rohingya refugees in the fragile environment of camps. These services range from support for rental negotiation on behalf of refugees, to dispute resolution through amicable techniques including mediation, application for HLP documentation for approvals and concluding rental and lease agreements. At the same time, ICLA provides due diligence services for other partners working in camps, to ensure safe and sustainable service points are established.



Graph 8: List and number of HLP-provided services in 2023

In the period January- October 2023, conducting rental negotiations on behalf of the households was the leading service provided by ICLA with a total of 1,054 cases. Dispute resolution through mediation and other collaborative

Provided services	2022	2023	Change in percentage
Three leading HLP services provided in last three year	Rental negotiations total 509	Rental negotiations total 1,058	107.8 % increase
	Application for the HLP Documentations total 335	Dispute resolution service total 857	460% increase
	Dispute resolution services total 153	Application for the HLP Documentations total 802	139.4% increase

Graph 9. HLP leading services

dispute resolution mechanisms, including providing training and capacity development for collaborative dispute resolution (CDR) offered to both refugee and host communities, made up 857 cases and there were 802 cases for the assistance with applications for HLP documentation. ICLA is committed to providing protection from eviction and facilitates resolving disputes and relocations to safer places according to needs identified in each case.

Rental negotiation and resolving disputes are becoming increasingly more vital for refugees to ensure their safe and secure access to shelter. There has been an increase for providing the services, accordingly with 107 cases, a 460 per cent increase, for these services in 2023.

Recommendations	
Reinforce coordination to sector, ISCG and HLP TWG (Technical Working Group)	Since HLP is a cross-cutting theme among sectors and impacts their interventions, there is need to forge an organised, joint effort to mainstream addressing HLP issues.
Advocate for preventive structural measures against rental increase, arbitrary renting, and eviction to ISCG and authorities in camp	1. Developing land tenure and rental mapping in camps to contain and prevent further increases in arbitrary renting practices and rental charges. And 2. Continuing advocating for a land administration regulatory framework to facilitate easy access to land for the Rohingya refugees and humanitarian actors in the camps. It is also crucial to continue advocating for documenting the transactions done by <i>Majhis</i> , whose intervention leading to relocation of refugees into Bhasan Char or disaster-prone areas, is often neither transparent nor informed.
Mitigate disputes on public resources through sector and HLP TWG	This is done by developing and enforcing the minimum standards for due diligence, which must be adhered to by all the relevant stakeholders, without exception, in collaboration with the sectors and led by a HLP technical working group. This will minimise the number of disputes over shared humanitarian facilities and prevent anticipated complication to the benefit of end users. Furthermore, this can be tackled by providing due diligence training and support to humanitarian partners by ICLA and the HLP WG (Working Group) advisor.
Redress the HLP rights of the most vulnerable groups to shelter partners and CCCM	By initiating rental subsidiary cash, voucher assistance (CVA) support to the households who are living on private land, after completion of land tenure mapping. This plan can be piloted for the most vulnerable groups including the elderly, women-headed households and people with disabilities.
Reinforce the community's resilience and capacity to resolve conflicts to HLP TWG and NRC	Continuing capacity building and community-based empowerment of local mechanisms in place to resolve the disputes through alternative conflict resolution.