

Safe Programming in Design of Cash and Voucher Assistance – Lessons Learnt

Introduction

Cash and Voucher Assistance (CVA) is frequently used as a modality in Plan International's priority sectors education, child protection and youth economic empowerment. CVA has potential to support the recipients to make decisions that affect their own lives and take control of their own recovery. Evidence summarised by ODI1 and UNICEF Innocenti² shows that CVA can have protective outcomes, increasing women's' decision-making power, and when used appropriately can have a transformational impact. While the benefits of CVA are well known, there have been some cases of negative reactions such as coercion and [violent] backlash from spouses, peers or community leaders³ that must be mitigated against in the design of the programme. Beneficiary safeguarding considerations are also under greater scrutiny, hence tools⁴ have been developed by CVA practitioners to encourage safe programme design for CVA. In 2019, Plan International tested the Women Refugee Commission's toolkit⁵ for safe programming in three countries during the planning phase of cash and voucher assistance. The case studies outlined below summarise these experiences and recommendations for further use.

What this document is and is not

This document aims to share the lessons learnt from using the toolkit and recommendations for how to make better use of the toolkit in Plan International's CVA design. This document is intended as a practical review on how to implement the tool, not a critique of the tool. It is not intended as a guidance note as one already exists within the toolkit. This document covers both the process of conducting the focus groups as well as the outputs from the focus groups as it was considered useful to share these findings to promote the tool in the design of future CVA.

Toolkit overview

Plan International teams in Indonesia, Uganda and Ethiopia tested a part of the toolkit, 'Optimizing Cash-Based Interventions For Protection From Gender-Based Violence' designed by the Women's Refugee Commission. The toolkit is organised into two sections, section I: minimising potential harm, namely gender-based violence (GBV) that can be catalysed by cash or vouchers being provided to an individual; section II: CVA as a programme tool to support case management for GBV survivors. Case studies in this document refer to Section 1, specifically the focus group discussion tool which supports practitioners to assess and mitigate potential risks and is accompanied by a postdistribution monitoring tool to monitor whether the risks occurred. The focus group discussion tool is based on scenarios designed around characteristics of diverse and marginalised groups, including women and men with disabilities, unaccompanied adolescents and LGBTQI individuals. The scenario can be adapted to reflect the local context, putting the protagonist in a familiar setting to the FGD participants which provides a degree of distance for participants to answer the questions in the third person, minimising their need to recount real life events. Section II includes a protocol to assess and address GBV survivors' needs for cash assistance within GBV case management services.

¹ Jessica Hagen-Zanker, Luca Pellerano, Francesca Bastagli, Luke Harman, Valentina Barca, Georgina Sturge, Tanja Schmidt and Calvin Laing, 2017: The impact of cash transfers on women and girls A summary of the evidence. http://www.cashlearning.org/downloads/11374-

Ana Maria Buller, Amber Peterman, Meghna Ranganathan, Alexandra Bleile, Melissa Hidrobo, Lori Heise; A Mixed-Method Review of Cash Transfers and Intimate Partner Violence in Low- and Middle-Income Countries, The World Bank Research Observer, Volume 33, Issue 2, August 2018, Pages 218–258, https://doi.org/10.1093/wbro/lky002

http://www.cpcnetwork.org/oct-24-2018-how-effects-of-cash-transfers-on-protection-and-wellbeing-outcomes/

Amber Peterman, Anastasia (Naomi) Neijhoft, Sarah Cook, Tia M Palermo; Understanding the linkages between social safety nets and childhood violence: a review of the evidence from low- and middle-income countries, Health Policy and Planning, Volume 32, Issue 7, September 2017, Pages 1049-1071, https://doi.org/10.1093/heapol/czx033

Ghana LEAP 1000 Programme: Baseline Evaluation Report, 2016: https://transfer.cpc.unc.edu/wp-content/uploads/2014/09/LEAP-1000-Baseline-Report 2016.pdf

3 Ibid: Figure 1. Program Theory Linking Cash Transfer and Intimate Partner Violence

⁴ See annex for list and links to tools

⁵ Mainstreaming GBV Considerations in Cash-Based Initiatives and Utilizing Cash in GBV Response, Toolkit for Optimizing Cash-based Interventions for Protection from Gender-based Violence

Limitations

Incorporation of the post-distribution monitoring (PDM) questions to monitor and analyse the risks must constitute the next step of this learning process. Furthermore, these case studies do not cover the use of CVA in case management in response to GBV. Only two focus groups have been conducted per country and therefore are not representative of the wider communities within which they are held.

Summary of learning and recommendations

Risk mitigation and quality programming

- CVA team trained on GBV referral pathways;
- confidentiality is favoured by vulnerable recipients over transparency, to protect their identity and avoid theft;
- feed results into delivery mechanism procurement, e.g. distribution close to the community if requested;
- consider standard integrated delivery model with CVA alongside female friendly spaces to capture and manage unreported GBV issues;
- alongside CVA, provide key messaging on the intention of the CVA, and provide awareness sessions on household financial management strategies, and gender-based violence;
- for young people, CVA should be provided within a package of child protection services (e.g. case management, psychosocial support, life skills) and livelihood support.

Quality focus groups

- adapt FGD tool for engagement with adolescents and young people;
- risk assessment should be grounded in gender and power analyses;
- ensure facilitators are trained adequately especially on protection issues;
- include gender and protection colleagues in the project;
- budget appropriately for staff time (esp. gender specialists) and translation;
- conduct security assessment on location of FGDs to ensure discussion is held in a safe space, with privacy and comfort.

Focus groups - context, process and challenges

Indonesia

In the post-earthquake and liquefaction context in Central Sulawesi, 2018, Plan International Indonesia provided a multi-sector response including multipurpose unrestricted cash, alongside vouchers restricted for dignity and education kits. The focus groups were held in March 2019 in an area near Palu with adults aged 18-60 (6 women and 10 men). As cash distributions had already taken place this activity was an opportunity to contribute to planning for future cash or voucher interventions. The Cash Program Officer (male) & interim Compliance & Quality Assurance Manager (female) led the discussions.

Due to limited knowledge of GBV the male facilitator of the male focus group found it difficult to talk with the participants about this heavily stigmatised issue which limited the group findings. The women's group were comfortable to discuss the GBV in the context of the questions but without specialised training the facilitator (female) did not probe into answers to understand at a deeper level the engrained cultural norms and practices, or to respond to issues raised. This disconnect between CVA and protection trained personnel represents a key learning of the toolkit testing exercise as it is essential for FGD leaders to be properly trained in dealing with any GBV issues disclosed. CVA is largely designed by non-protection specialists and therefore runs the risk of causing harm. During this discussion the older women were less forthcoming which was perceived by the facilitator to be due to the language barrier. Their reticence could also potentially be attributed to the different views of age groups and participants present.

Uganda

Uganda hosts hundreds of thousands of refugees from South Sudan which remains unpredictable and violent. Refugees arriving in Adjumani continue to report hunger, lack of education opportunities, and the need for family reunification. Plan International Uganda has been responding with interventions in Education in Emergencies, Child Protection in Emergencies (CPiE) and WASH. According to UNICEF in April 2019, Adjumani hosted around 5,257 unaccompanied and separated children (UASC)⁶. UNICEF cited reports of abuse in some foster care arrangements, in response to which Plan Uganda embarked on a project directly supporting unaccompanied and separated children with financial assistance and case management to enable safe independent living arrangements.

The focus groups were held with adolescents to determine their perspective of cash and vouchers, and the perceived risks this entails. One focus group was held with adolescent boys and one group with adolescent girls between the

⁶ Uganda - Refugee Statistics April 2019 - Adjumani

ages of 14-17 years. Participants were chosen to take part if they identified as adolescents in foster care or unaccompanied adolescents in child headed households. The focus groups were facilitated at the child friendly space (CFS) by the child protection case managers, and translation support provided by the CFS animators. With CPIE colleagues facilitating the sessions, the groups benefited from the use of role play and group brainstorming, especially around engaging the participants in reading and understanding the scenario.

The length of the tool, which takes approximately 1hr-1hr30 depending on the depth of discussion, is too long for this age group to engage with in-depth in one session. Despite having adaptable questions for adolescents, the tool could be better oriented towards engaging with children and young people. Despite some adaptation made for young people, some of the questions in the tool remained difficult for the young participants to engage with and would require further adaptation to improve comprehension and relativity to the adolescents' lives.

Ethiopia

In April 2018 insecurity and localised conflict between communities in Gedeo Zone (Southern Nations, Nationalities, and Peoples' Region – SNNPR) and West Guji Zone (Oromia Region) led to the rapid displacement of people⁷. Houses were burned, and people were forced to flee quickly. Assets and livelihoods were lost, education disrupted, protection concerns increased and other basic services and infrastructure damaged for both IDPs and host communities. Plan responded with child protection, education, WaSH and nutrition services, and trialled CVA as part of a complementary intervention.

In August 2019, two focus groups with women were held in SNNPR in two kebeles hosting returnees and host communities affected by the conflict. The FGDs were conducted by a female health worker from the nutrition project supported by the programme area Finance Officer (female) taking notes. Team members translated the tool into Amharic and further local language translation was supported by participants of the focus groups. Due to the political sensitivity of the IDP crisis, it was hard to determine who was displaced and who is considered a 'returnee' to their place of habitual residence.

Results - Benefits & Risks of CVA Identified, and Risk Mitigation

Indonesia

The focus group discussions with women and men in Palu identified a lack of understanding about what constitutes GBV with intra-community violence and intimate partner violence (IPV) accepted within the behavioural norms of the community. GBV was not explicitly mentioned as a consequential risk after the receipt of CVA in this community. However, the discussions revealed intra-household dynamics related to household expenditure that would have positive protection benefits on cash recipients. Both groups of men and women mentioned that discussions would take place between the husband and wife on the use of the assistance, and that this would reduce household tensions. Both women and men said that they should be the primary recipient to receive the cash assistance. The women firmly recommended that they should be the primary recipients in case the husband does not share the whole value for household needs. Discussion with the husband is considered important to agree priorities and prevent disputes over purchases such as cosmetics.

Regarding distribution, women who don't own a motorbike usually depend on motor-taxis for transport to and from market/ distribution which incurs a charge and could pose potential risks. Travelling at night especially is considered unsafe. Childcare commitments may prevent women from attending the distribution. Women were concerned that disputes may occur in the household if the money was spent without consultation. Outside of the household, conflict or tension might occur with lenders if debts are not paid and the receipt of money was known, therefore men would ensure middlemen are repaid. Other than with lenders, women considered that community tension would be unlikely as long as targeting criteria is well understood by their neighbours. Men considered the main risks of criminal activity to be perpetrated by outsiders of community/ village. Community tensions between selected and non-selected households were not reported as a concern; generally, men and women perceived that the support would improve community relations as credit could be repaid on loans due to community members and suppliers (for livelihood inputs), and the assistance shared with non-selected households whom the community deemed eligible.

3

⁷ IOM displacement tracker matrix, August 21st 2018

To determine whether incidences of GBV/ IPV related to CVA would be reported, the women discussed whether incidents of intimate partner violence (IPV) occurring are formally reported to authorities or an organisation. They unanimously agreed that the close intracommunity dynamics would prevent reporting of IPV/GBV incidents, unless considered to be a transgression of accepted GBV within the community. However, the women did not offer examples of what could constitute a transgression in terms of severity or perpetrator. The women added they would not expect reports to be properly followed up on by authorities. women said they would feel safer if the amount distributed is not made widely known to the community as this may encourage debtors to extract repayment immediately or even before distribution.



Figure 1: Women utilise CVA to purchase food in the Central African Republic

Access to withdrawal points closer to the village would make the women feel safer, as well as being well informed of the date and time of the distribution to plan accordingly. To avoid theft, women are aware of saving in a bank account, while others keep money locked in a drawer at home or with the husband. The women suggested that targeted awareness training on GBV provided by an external organisation would be beneficial for everyone in the village

Uganda

The girls' priorities for expenditure emphasised school costs, including fees and materials, and clothes, food, shelter and transport costs to meet family in other settlements while boys spending priorities included school fees and materials alongside purchasing clothes, food and traveling to meet with family in neighbouring settlements.

Adolescent Girls

Girls mentioned both positive and negative external influences on their spending choices indicating both support around financial management as well as coercion and diversion of resources; 'some people will disturb her to use the money in a different way', vs. 'someone would advise her to keep the money properly'. The girls perceived a greater level of risk pertaining to the receipt and use of CVA than the boys. Risks included a range of violence including physical through theft and robbery, verbal abuse, and psychological due to jealousy from trusted relationships at school, from neighbours and from potential future husbands. Furthermore, the girls' reaction to the potential end of support indicated potential negative coping mechanisms including school drop-out, marriage, begging, self-harm and suicide. The severity of these answers indicate a serious need to provide CVA alongside a package of child protection services and closely monitor the CVA provision with ensuring regular follow-up and monitoring. Project sustainability and safe exit strategies are fundamental to ensuring young recipients have clear communication and resilience strategies to cope at the end of the project. This project has been designed to link to sustainable livelihood strategies although communication of that component had not been made at the time of the focus groups. On a positive note, the girls identified the potential for CVA to improve their living conditions through investment in their shelter quality, increased access to food, and to travel to neighbouring camps to meet family.

In the event of experiencing GBV, the girls mentioned reporting mechanisms including police, residential block leaders and heads of families (in the case of fostered or separated children) and added school head teachers if the abuse occurred at home. To reduce the risks identified, the girls would require maintaining confidentiality of the financial support received with bank accounts and bags to conceal the cash. Confidentiality is a core principle of case management whereas transparency is often prioritised in CVA targeting and selection including displaying lists of recipients for community verification especially in livelihood programming. These programme approaches need to be reconciled for good quality, safe CVA to occur. In reference to financial service providers, the girls preferred mechanisms which provided privacy during cash collection and withdrawal. They ranked mobile money as the safest

mechanism⁸, followed by banks and finally cash in hand, which was ranked as the riskiest option. The girls also expressed a preference for in-kind provision of school scholarships, clothes and shelter; alternative modalities of

⁸ In Uganda under 18s are not legally permitted to have a financial account with mobile money or a bank, in which case the account would be held in the case managers' name and withdrawn with both people present.

CVA may be acceptable for the girls such as vouchers or conditional cash assistance. They request sensitisation of the community and school head teachers not to mistreat the girls. Sensitisation should take place through schools and community mechanisms. They recognised one other international organisation that provides scholarship support in the settlement⁹.

Adolescent Boys

The boys had confidence that they would be able to make decisions on how to spend the money provided but noted that they would use the money to benefit host families, as well as sharing with other community members to ease any social tensions arising with non-beneficiaries. Regarding household dynamics, the boys considered that they would be the decision maker, regardless of whether younger female siblings are the primary recipient of the cash. This is an important consideration to further unpack with both boys and girls and corroborates the opinion of the girls that they would experience social pressure if they were the primary recipient. The boys indicated they would decide to re-enrol younger sisters at school, improve food availability at home to achieve a balanced diet and pay for medical expenses.

The boys recognised protection benefits of having a cash income including better nutrition 'better balanced feeding', cessation of begging, building and improving shelters, going back to school and paying for medical services. They also envisaged themselves as a role model in society and being able to support younger, vulnerable children. This would lead to some members of the community becoming friendlier and showing more respect to the recipient as he becomes a role model and can meet his own basic needs. The cash received would enable the boys to initiate a business which would sustain him beyond the lifetime of the project. Overall, conflict would be reduced as the recipient considers he would be able to cooperate with other members of the community through supporting and sharing the assistance. The boys displayed more resilience than the girls in reference to the assistance coming to an end, with a leaning towards investing the cash in productive livelihood activities such as petty trading.

The group did perceive some potential risks related to the receipt of cash, mainly caused by jealousy of other community members. The boys suggested physical attacks, including theft, may occur as well as verbal insults if the recipient is not willing to share the money. This could lead to generally feeling unsafe in the community. While the boys' perception of sharing the assistance with community members is generally seen as a benefit, it can be inferred that they would experience coercion from various influential community members, including leaders, neighbours and peers who would all expect to be supported with a share of the cash. With regards to the assistance ending, the boys didn't present any projected fear, and stated simply peers in the community would no longer expect them to share their income. The boys identified woman and people with disabilities as groups at greater risk of experiencing verbal and physical violence.

To ensure safety, the boys would improve security around their shelter through purchasing padlocks and fencing around the property. They would also share the money with neighbours to prevent jealousy and sensitise the neighbours and the wider community to the purpose and importance of the assistance. Plan should consider engaging or sensitising community leaders on the purpose of CVA to prevent coercive requests. The boys recognised that having a bank account would enable them to store the money safely, however the group ranked this delivery mechanism as third (last) choice after mobile money and vouchers due to inaccessibility of bank branches from the settlement. The boys identified reporting mechanisms including police, an INGO¹⁰, community leaders, neighbours and teachers, however mentioned not feeling safe to report in all incidences and types of violence. In order to communicate and sensitise the community, the boys suggested using posters with information of GBV and creating community dialogues through meetings with residential block leaders and elders regarding the purpose of the activities.

Ethiopia

Despite similar characteristics of the two kebeles¹¹ and a close geographical proximity, the two groups responses were diverse, highlighting the value in conducting and analysing more than one focus group within the same demographic. The women agreed that there would be a discussion within the household to decide how to spend the money; the women could not take the sole decision. Culturally the husbands would be responsible for making the decisions, however the women intimated they have grown more aware of their rights and have begun to play a role in decision making. Some husbands are more dominant than others – the women referred to 'good husbands' and 'bad husbands'; good husbands would understand than women have been selected to receive the money and would be open to a discussion about expenditure. The definition of 'bad husbands' was not discussed however risks of IPV/ GBV were inferred.

⁹ This organisation also provides cash to adolescents through mobile money via case workers, but this wasn't mentioned by the girls.

¹⁰ Lutheran World Federation. Similar to the girls, the boys did not mention that the LWF is delivering cash assistance to adolescents.

¹¹ Kebele is the smallest administrative unit in Ethiopia.

The women were concerned that there could be a risk of theft on the return route from collecting the money, or on the way to the market to use the money. Some women discussed the likelihood of abuse perpetrated by their husbands if he feels entitled to the money. The assistance could cause tension, leading to the husband perpetrating physical violence against his wife. The women also felt that they could be pressurised by their husband's relatives to spend the money in particular ways. Neighbours – 'host community' – could also request a share of the money. Where debts have been taken on credit, some respondents highlighted the risk that the creditors may force repayment on loans and prevent the family from spending the money on their essential needs. Specifically, both groups mentioned the potential for rental prices to increase. Many homes were destroyed in the conflict. The groups had mixed perspectives whether the assistance would cause tension in their communities. Some neighbours may become jealous or envious of the recipient, others would be happy for them receiving support. Some non-beneficiaries may feel deserving but excluded from the programme. This could lead to tension and violence. Some women thought beneficiaries may be boastful that they've received the support which would lead to greater jealousy within the community. Overall however, the groups did not foresee that the assistance would cause significant distortion of their relationships within the community.

Expenditure suggested by women in both groups included priorities that would have protection benefits for the whole family, including; sending their children to school, purchasing more nutritious food, increasing shelter (rental) costs, savings (specifically mentioned for households without rental costs), purchasing clothes for children, and making livelihood investments. Intrahousehold relations could improve as husbands would be relieved of the burden of some daily labour to cover household expenses, reducing tension. The women specified this would depend on the success of awareness raising activities accompanying the distribution, to reassure the husbands of the purpose of the support and not to feel threatened by their wife's economic independence. One group observed that opportunities for women to come together and share information during distributions has had a positive effect on intra-community dynamics. Due to gatherings for selection and distribution of humanitarian aid, the women have organically shared experiences, and learnt from each other's practices in petty trading and business, particularly cross-fertilisation of ideas from displaced communities to host communities and vice versa. Furthermore, they have enjoyed the opportunity to partake in training and to be connected with suppliers for business opportunities in humanitarian interventions. The women perceive that their bargaining power will increase once they're exposed to markets with cash assistance. Their status in the community will also improve as they can support less well-off neighbours.

Communication around the assistance requires careful planning with the selected women. In general, women requested low-visibility distributions (to prevent community interference), and awareness raising for their husbands on the intended use of assistance, as well as training for the recipient on the best use of the funds. However, some women with so-called 'bad husbands' would potentially keep the assistance confidential from their husbands too, to avoid tension and misappropriation of the money. Women with 'good husbands' would discuss spending



Figure 2: Voucher for a new school uniform at a school supported by Plan International in

priorities together. Training of community members, or a small number of elders, would be acceptable to some women to ease any potential jealousy arising, although names of beneficiaries should still be kept confidential to avoid risk of theft and intimidation. To reduce risks en route to and from distributions and market, women would want to be accompanied by their husbands (good and bad), and would carry small amounts of cash when possible.

The women said physical violence perpetrated outside of the home could be reported to neighbours, community elders, police and Women and Children's Affairs department. Violence within the household would not necessarily be reported for fear of exacerbating tension, however in some cases neighbours and elders would negotiate and mediate between the couple. This would be the case for all forms of violence. Communication from INGOs to the women is preferred face to face as there is no media in the area. They mentioned one INGO working in the kebele delivering food in-kind. The women were unable to rank preferred delivery mechanisms (they were not familiar with the exercise of ranking) but were aware of banking as an option.

Conclusion

The experience detailed in this document validates the use of the WRC tool and other similar safe programming planning tools. Holding discussions with the intended recipients of CVA is an important step in understanding their concerns around perceived risks and provides insights into what actions recipients will take to reduce the risks. These discussions shed light on power dynamics at play in the communities, expenditure priorities and their impact on the

safety of individual recipients, and reporting mechanisms available to the FGD participants. Ideally a gender and power analysis should be conducted within which to ground the results. The findings of these three contexts provide diverse insights including common concerns to all groups. The results of these discussions should feed into a detailed risk analysis, with mitigation measures built into operating procedures, and monitored by specific indicators at process and outcome level.

Crucially for Plan International, moving towards providing more CVA for adolescents integrated into case management, guidelines for use of this tool with young people should be developed. The groups conducted with adolescents in Uganda by the Child Protection team produced rich information which is most likely due to the facilitation skills of the trusted child-friendly space animators and case managers. A child friendly version of the tool would enable even richer results from young participants.

One of the strongest recommendations to come from all groups is to maintain confidentiality of selected beneficiaries. This will be particularly important when integrated CVA with case management to ensure principles are upheld, however may prove contentious for CVA and livelihood professionals who traditionally promote transparency of targeting processes and selected beneficiaries. Strong accountability (AAP) mechanisms are integral to attain beneficiary confidentiality, ensuring the community are well informed of the purpose and process around targeting for the project (eligibility criteria, selection process etc). Feedback mechanisms must provide meaningful and accessible channels to enable the whole community including excluded individuals to report.

Improving Focus Group Discussions

It should go without saying that across all experiences working with translated tools in local languages facilitates a smoother discussion than on the spot translation. It is also recommended to have a notetaker in addition to the lead facilitator as this will enable the interviewer to converse more easily with the group and probe into discussion points. A security assessment should be carried out ahead of time to prepare a safe and confidential location to conduct the FGD. Gender balanced teams within COs or field teams should be trained in focus group facilitation. Same sex facilitators must be available for each focus group to create a safe and approachable space for discussions. Facilitators must be comfortable discussing sensitive and stigmatised issues, generating discussion on group experiences around coercion and abuse to identify the key dynamics in the community; involvement of gender, protection and MEAL colleagues in the implementation and analysis of the focus groups would support this. In the event of an individual disclosure, focus group facilitators must be aware of the referral mechanisms and able to sensitively signpost the individual to relevant services.

Annex

Acronyms

AAP Accountability to affected populations

CFS Child Friendly Space
CHH Child Headed Household

CP[iE] Child Protection [in Emergencies]
CVA Cash and Voucher Assistance

FGD Focus group discussion
FHH Female Headed Household
GBV Gender-based Violence
IPV Intimate Partner Violence

INGO International Non-governmental Organisation

IRC International Rescue Committee

MEAL Monitoring, evaluation, accountability and learning

PDM Post-Distribution Monitoring

UASC Unaccompanied and Separated Children

WRC Women's Refugee Commission

Toolkits and resources

Women's Refugee Commission:
 Optimizing Cash-Based
 Interventions for Protection from
 Gender Based Violence

International Rescue Commission:
Safer Cash Toolkit

 Care International: Cash and Voucher Assistance and Gender Based Violence Compendium

The case studies and lessons learnt were achieved thanks to the dedication of the programme teams in Indonesia, Ethiopia and Uganda, in particular project leads Yulies Puspita and Yifru Ambello and the Child Protection in Emergencies Team in Adjumani, Uganda. The report was authored by Plan International UK's CVA Adviser, Jen McAteer with review and input from Plan International's Global Child Protection in Emergencies Adviser, and Plan International UK's Child Protection in Emergencies, Gender in Emergencies and Safeguarding Advisers. January 2020