PROTECTION SECTOR
COX'S BAZAR, BANGLADESH

HOUSING, LAND AND PROPERTY (HLP) SITUATION OF NEWLY ARRIVED REFUGEES IN COX'S BAZAR – ASSESSMENT REPORT

JANUARY 2026

1. SNAPSHOT OF THE KEY FINDINGS

The Housing, Land and Property (HLP) Working Group carried out an assessment using household surveys, focus group discussions (FGDs), and key informant interviews (KIIs). The findings below present a snapshot of how newly arrived refugees access shelter and navigate tenure arrangements, pointing to widespread informality, high exposure to eviction, and gender-based barriers in accessing secure and adequate accommodation.

- **Accommodation pathways are diverse and largely informal:** New arrivals report mixed shelter access routes with 40% households living with relatives, 35% in their own shelter (rented or hosted), and 17% outside the camps with the host community. A total of 14% report buying a shelter—mainly from host community member but in some instances through Majhis.
- **Eviction remains a persistent protection risk for new arrivals:** Approximately 10% of surveyed households report having been evicted (some multiple times) within and between camps and sometimes to the host community area outside of the camps. 16% of newly arrived have received eviction threats, and 47% are worried about future eviction.
- **Rental informal arrangements are widespread:** About 37% of new arrivals pay rent and 48% report paying more than BDT 1,000 (USD 8.2) per month. Among renters, 70% consider rent unaffordable.
- **Tenure security is very low due to lack of documentation:** Among renters, around 90% do not hold a written rental agreement; among those who bought a shelter, 92% lack written proof of purchase/ ownership. Absence of documentation leaves households highly vulnerable to disputes, land claim and eviction.
- **Dispute resolution is predominantly informal and male-led:** Households facing HLP issues, first approach Majhis/Imams with fewer refugees seeking support from CiCs and humanitarian partners out of fear of reprisal or lack of knowledge. Outcomes of dispute resolution, particularly those addressed through informal mechanisms, are inconsistently documented and weakly linked to formal referral pathways.
- **Gender-based barriers restrict access to tenure:** Women rarely negotiate directly with community/ refugee leaders including Majhis, to address HLP issues; female-headed households are more easily evicted, lacking written claims and spaces to participate and advocate. This also contributes to under-reporting and unequal access to remedies.
- **Insecurity of tenure leads to degraded shelter quality and access to service:** Fear of eviction discourages maintenance/rehabilitation, particularly among newly arrived and female-headed households.

2. BACKGROUND

The escalation of conflict in Rakhine State has led to sustained attacks on Rohingya villages, widespread persecution, forced recruitment, and severe restrictions on access to essential services. These conditions have forced many Rohingyas to flee to Bangladesh in search of safety. Between 5 January 2025 to 24 January 2026, a total of 142,844 newly arrived individuals (37,570 families) were biometrically identified, of whom 68% are women and children. A significant number of newly arrived refugees face specific vulnerabilities, including single parenthood, disabilities, and separation from family (770 unaccompanied and separated children -UASC- have been biometrically identified among the new arrivals).[1]

Following the 2017 influx, the Government of Bangladesh allocated land in Teknaf and Ukhiya sub-districts of Cox's Bazar to accommodate Rohingya refugees. However, these designated sites overlap with privately owned land in Teknaf and forest land in Ukhiya, the latter being areas where host community members have established rights to use under the social forestry rights. This overlap has created a complex and fragile tenure environment, where both private landowners and social forestry right-holders claim legitimate interest over the same plots now occupied by refugee settlements. As a result, tenure insecurity has become a central issue. Refugees residing on such land often lack any form of legal recognition or documentation, making them vulnerable to exploitation, arbitrary rent increases, eviction threats, and land-related disputes.

Due to limited space and administrative constraints, newly arrived refugees have not been allocated formal shelters and instead rely on relatives, informal rental arrangements, or unauthorized land purchases to secure accommodation. They rent from the host community members, existing refugees as well as Majhis/ block leaders. Many live in overcrowded and poorly constructed shelters, either inside the camps (across nearly all camps in Ukhiya and Teknaf) or within adjacent host community areas. Without any legal protection or documentation, they face heightened protection risks and it exasperates social tensions, particularly affecting women, older persons, and persons with disabilities.

In Teknaf, camp boundaries significantly overlap with privately owned land, and some host community members reside within designated camp areas. As a result, many newly arrived refugees have entered informal rental agreements with private landowners, contributing to a high volume of housing, land and property (HLP) disputes and eviction cases. The majority of HLP-related cases reported to the Working Group come from Teknaf, particularly Camps 24, 25 and 26, where land overlap is most pronounced.

This situation is further compounded by the presence of criminal groups in Teknaf, who have increasingly targeted refugees through extortion, threats and physical violence. In 2025, more than 100 refugee households in Camp 24 reportedly relocated to other camps due to serious protection concerns, including intimidation, assault and threats of abduction. While these cases have not been formally verified, community accounts indicate that in some instances such pressure may be linked to landowner interests, with criminal groups allegedly used to create insecurity and displace refugees for alternative land use.

3. ASSESSMENT COVERAGE AND SAMPLE PROFILE

64%
Male-headed households interviewed

35%
Female-headed households interviewed

5
Average household size (members)

80%
HHs with children (<18)

1,851
Individuals included in household rosters

10%
Individuals with disability

22%
Households with an older person (60+)

56%
Female-headed HHs with no adult male (18+)

1. The Government of Bangladesh distinguishes new Rohingya arrivals from Rohingya refugees who arrived in the 1990s or earlier and from Forcibly Displaced Myanmar Nationals (FDMNs) who fled in 2017/18. While humanitarian assistance is being provided to new arrivals, biometric identification efforts continue in 2025 to accurately quantify and identify this population in Cox's Bazar. In parallel, humanitarian and donor actors continue to advocate for biometric registration of new arrivals to protect them against forced return and ensure equitable assistance across the camp population.

4. METHODOLOGY

The assessment used both quantitative and qualitative methods. A total of 399 households were surveyed, 35% of respondents were women. A total of 76 key informant interviews and 16 focus group discussions were also conducted. Data collection took place between 10–25 August 2025 across 25 camps in Ukhiya and Teknaf, selected based on UNHCR data identifying those with the highest numbers of newly biometrically registered arrivals.

Twenty-five trained staff from the HLP Working Group carried out the data collection in person, ensuring consistency and quality across all sites. While the household survey primarily targeted newly arrived refugees, the KIIs and FGDs engaged a broader range of stakeholders to capture diverse perspectives on HLP issues. Participants included Majhis, Camp-in-Charge (CiC) officials, block leaders, refugees from earlier influxes, host community representatives, and religious leaders, enabling a comprehensive understanding of both camp-level and community-based HLP dynamics.

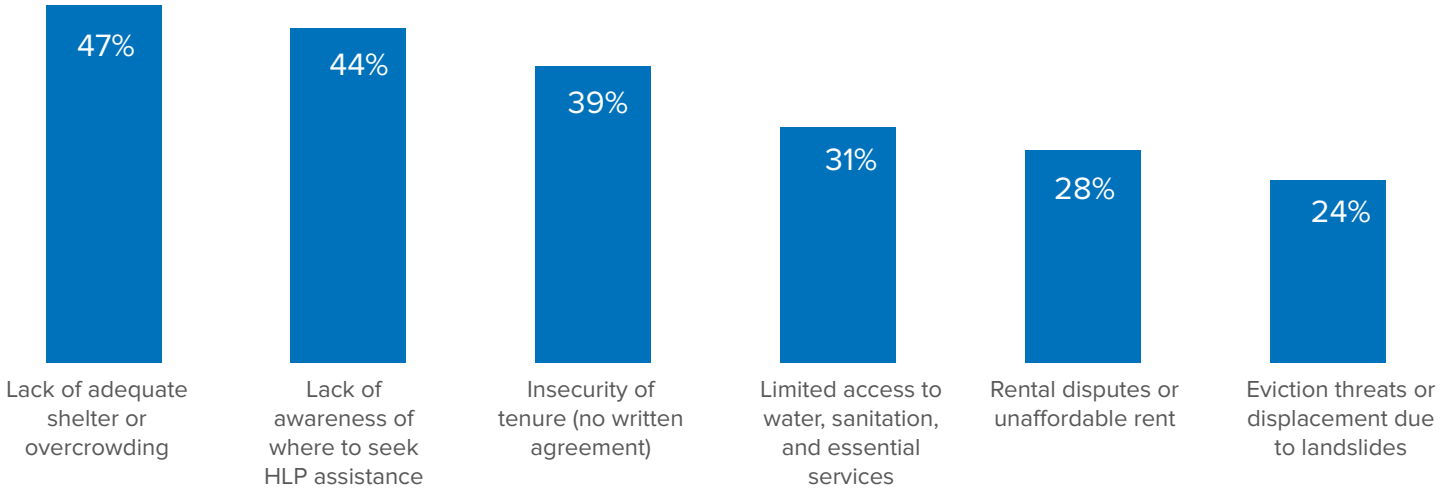
The surveyed households consisted of 1,851 individuals. Disability was measured using the Washington Group Short Set (WG-SS) for individuals aged 5 years and above, totaling 1,548 individuals, defined as reporting "a lot of difficulty" or "cannot do at all" in at least one area.

New arrivals refers to Rohingya individuals who have arrived in Bangladesh since 2024 due to renewed conflict in Myanmar and who have been biometrically identified by UNHCR and the Government of Bangladesh but are not individually registered as refugees.

5. MAIN HLP CHALLENGES

The assessment reveals that new arrivals continue to face critical HLP challenges across camps. The most frequently reported issues include lack of shelter space, insecure living arrangements, rental disputes, and eviction threats. A significant number of respondents also identified difficulty accessing basic services, closely linked to their unstable shelter situations.

Figure 1: Main HLP challenges reported by respondents % of respondents:



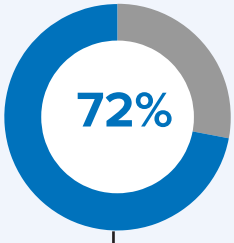
5.1. LACK OF SHELTER SPACE

The data indicates that most new arrivals are unable to secure stable or adequate shelter upon arrival and often rely on informal or temporary arrangements. In addition, nearly four in ten households reported insecurity of tenure, while eviction risks and disputes related to shelter ownership were cited as frequent concerns.

FGDs across multiple camps provided deeper context to these figures, illustrating the complex and overlapping nature of HLP challenges faced by new arrivals. In several FGDs, participants explained that, in the absence of formal shelter allocation, many new arrivals initially rely on relatives or acquaintances for temporary accommodation, which quickly leads to overcrowding and tensions within households. For instance, participants in Camp 27 and Camp 8W noted that in some shelters, up to three families share only one shelter, which is usually around 150 square feets, making privacy and safety, particularly for women and children, a major concern.

KII respondents corroborated this situation, with camp leaders and Majhis reporting that the camp infrastructure has not expanded in pace with population increases. One KII respondent from Camp 17 explained that *"newly arrived families come with nothing, they have to depend on others for space, and this dependency creates conflict over time"*. Another key informant emphasized that limited shelter allocation by CiC offices forces many families to seek informal options, including paying rent to other refugees or host community members.

Figure 2: Households reporting insufficient shelter space



reported their shelter space is insufficient

A majority of surveyed households reported inadequate space to meet basic living needs, including privacy and safe sleeping arrangements, and this concern increased with household size, with the highest levels reported among households with seven or more members.

5.2. LACK OF TENURE SECURITY

Both household data and FGDs confirmed that most new arrivals live without formal tenure documents, due to the lack of formal settlement arrangements. The absence of written agreements leaves them vulnerable to eviction and exploitation. FGD participants in Camp 26 shared that they *"have verbal permission from other refugees to stay temporarily but can be told to leave at any time."*

Several KIIs pointed to the lack of clarity in shelter ownership—particularly where older refugees "sell" or "rent" camp shelters to the new arrivals despite official guidelines that restrict refugees from selling or renting shelters. In some instances, more than one refugee family claimed ownership over the same structure, this creats disputes that local Majhis struggled to mediate.

These informal arrangements not only undermine tenure security but also expose new arrivals to financial exploitation. FGD participants in Camp 15 mentioned paying up to BDT 10,000 (USD 82) in "informal rent" as a lumpsum for one year to occupy a shelter that was supposed to be free of charge. Such payments, often verbal and undocumented, highlight the extent to which informal transactions have become normalized within the camps.

> *"We have verbal permission from other refugees to stay temporarily but can be told to leave at any time."*
>
> *FGD participant in Camp 26*

5.3. GENDER-BASED AND OTHER VULNERABILITIES

The FGD data underscores that HLP challenges are not experienced equally across all groups. Women-headed households, older persons, and people with disabilities were consistently described as the most disadvantaged in accessing adequate shelter and securing tenure.

Women explained that they have limited decision-making power in negotiating shelter or rent arrangements and rely heavily on male relatives or community leaders. One participant in Camp 8W stated that "*when women ask for a place to stay, people don't listen seriously—they think a woman alone cannot manage*". KIIs similarly observed that social norms and power imbalances reduce women's ability to claim shelter rights or challenge eviction. A Camp 25 community leader noted that *"women often get the smallest or least secure shelters because they cannot negotiate directly with Majhis or landlords."*

Similarly, people with disabilities faced heightened barriers. One caregiver in Camp 11 noted that *"when you share a shelter and have a disabled family member, moving them outside for water or the toilet becomes almost impossible, especially at night."* Children were affected by overcrowded shelter conditions, with FGDs reporting limited space, reduced privacy, and lack of safe areas for play, affecting their well-being.

5.4. STRUCTURAL AND POLICY LEVEL CHALLENGES

KIIs emphasized that the underlying HLP challenges stem from structural limitations in the camp management system. Space is scarce, and there is no official policy framework guiding the allocation or reallocation of shelters for new arrivals. As one KII respondent from Camp 26 explained, "*the CIC office does not issue authorization for new shelters, so people occupy whatever space they can find.*"

This gap in governance has resulted in inconsistent practices across camps; in some camps, Majhis mediate shelter access; in others, host community members exert influence. The result is a fragmented system in which new arrivals are left with little recourse or protection if disputes arise.

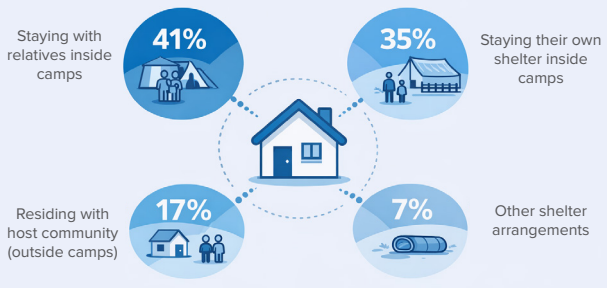
FGD participants repeatedly called for clearer rules and improved coordination between CICs, community leaders, and humanitarian actors. They stressed that lack of a transparent shelter allocation system is fueling conflict, uncertainty, and repeated displacement within the camps.

6. SHELTER ARRANGEMENTS

New arrivals have adopted various strategies to secure shelter. While the majority continue to live with relatives inside the camps, others have either rented or purchased shelters of their own[2]. Specifically, 41% of respondents reported living with relatives in the camps, 35% said they occupy their shelters (either renting or having bought them), and 17% indicated residing outside the camps within host communities. Nearly all respondents living with relatives described their situation as stressful and uncomfortable. These figures indicate that many new arrivals continue to depend on informal or shared shelter arrangements. The lack of adequate space compounds protection risks and heightens exposure to eviction, especially for women and children.

Under Bangladesh's legal framework, it is of note that foreigners are legally prohibited from purchasing or owning property in Bangladesh without prior government approval. As a result, all land and shelter transactions involving Rohingya refugees occur outside the formal legal system. Both Rohingya and host members are aware that such arrangements are unofficial; however, due to limited shelter options and space constraints, refugees often resort to informal property purchases or verbal rental agreements. These practices leave them without legal protection, exposing them to eviction risks and potential legal consequences in the future.

Figure 3: Reported shelter arrangements among new arrivals



Other shelter arrangement: Staying in temporary or atypical shelters, e.g. schools, mosques, transit sites, or similar.

[2]Foreigners are legally prohibited from purchasing or owning property in Bangladesh without prior government approval. As a result, all land and shelter transactions involving Rohingya refugees occur outside the formal legal system. Both Rohingya and host members are aware that such arrangements are unofficial; however, due to limited shelter options and space constraints, refugees often resort to informal property purchases or verbal rental agreements. These practices leave them without legal protection, exposing them to eviction risks and potential legal consequences in the future.

6.1. OVERCROWDING AND TEMPORARY LIVING CONDITIONS

FGD participants across multiple camps consistently described severe overcrowding as one of the main difficulties new arrivals face immediately after settlement. Participants in Camp 27 and Camp 15 explained that families often stay in shelters meant for one household, resulting in extremely cramped conditions and lack of privacy.

> In some cases, families reported having to ***"sleep in shifts due to lack of space."***

In Camp 12 and Camp 26, several participants said that newly arrived families constructed makeshift shelters using tarpaulins or bamboo, often in hilly or flood-prone areas. These structures are unstable and frequently damaged during the monsoon season. One woman in an FGD described how her family *"had to rebuild our shelter three times during the last rains because it kept collapsing."*

KIIs confirmed these observations, noting that the limited land availability and halted camp expansion leave no safe areas for shelter construction. A community leader from Camp 17 mentioned that *"new arrivals usually occupy whatever small vacant space they find, even if it is unsafe."*

6.2. RELIANCE ON RELATIVES AND SHARED SPACES

Sharing shelter space with relatives or neighbors emerged as a common coping strategy among new arrivals. This practice reflects solidarity within the refugee community but also creates tensions and dependency.

FGD participants explained that those who stay with relatives often feel pressured to contribute to food or rent expenses, which many cannot afford. In Camp 8W, a participant stated: *"At first, our relatives helped us, but after a few weeks, they asked us to leave because their shelter was too small."*

KII respondents further highlighted that overcrowding leads to disputes and even family separation. One Majhi from Camp 25 noted that "*many families who arrive together end up splitting across different shelters because there simply is not enough room."*

> *"When families stay with relatives, they do not feel secure because they know the arrangement can end suddenly if there is a disagreement."*
>
> *FGD participant, Camp 14*

6.3. LIVING CONDITIONS AND SAFETY CONCERNS

FGD participants repeatedly raised safety and privacy concerns in shared or temporary shelters, particularly affecting women, adolescent girls, and persons with disabilities. Overcrowding, inadequate partitions, and lack of secure doors were mentioned as factors that compromise privacy and expose women to harassment or theft.

Participants also mentioned that limited access to WASH facilities and long queues at communal latrines exacerbate safety risks, especially at night. In one discussion in Camp 27, women reported avoiding nighttime latrine visits due to fear of harassment.

KIIs echoed these issues, emphasizing that camp infrastructure was originally designed for a smaller population. As one CIC official shared: *"we cannot allocate additional space because the camp layout is fixed. Families just keep arriving, and we have to manage within existing limits."*

> *"In shared shelters, women cannot change clothes or sleep comfortably because there are too many people in one room.*
>
> *FGD participant, Camp 13*

6.4. INFORMAL SHELTER CONSTRUCTION

In several camps, both in Ukhiya and Teknaf that are covered in this assessment, new arrivals have resorted to self-built or makeshift shelters on hazardous terrain, on steep slopes or landslide-prone hillsides, as no flat land is available. These shelters are mainly built from reused or worn-out materials, often borrowed from relatives or salvaged from old shelters. One participant of a FGD in Camp 26 said: *"We built on a slope because it was the only empty place. When it rains, the water comes through our floor."*

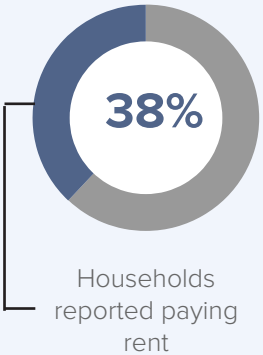
KIIs confirmed that humanitarian actors have repeatedly warned against these unsafe locations but acknowledged that no viable relocation sites exist at present. As a result, households remain exposed to heightened risks during the monsoon season. This is reflected in ERP 2025 data, which reports more than 14,500 shelters partially or completely damaged by monsoon-related hazards, particularly windstorms and landslides, leading to the displacement of nearly 10,900 individuals and ongoing instability for affected households.

7. RENTAL PRACTICES

Household data indicates that rental arrangements are widespread among newly arrived refugees. These practices are informal and officially discouraged by CiC authorities through verbal guidance, in the absence of a formally documented policy or penalty framework. Approximately 38% of households surveyed reported paying some form of rent for their current shelter, while another 27% said they were staying rent-free but under temporary or verbal agreements with relatives or previous occupants. The remaining 35% reported occupying their own shelters (either allocated to them by camp authorities and refugee leaders, or they have occupied a space and built their shelter without paying rent.

Gender analysis of the household data suggests that female-headed households are slightly more likely to rent shelters (42%) than male-headed ones (36%). This reflects both limited access to allocation processes and social constraints that make it harder for women to negotiate direct shelter allocations through camp leaders or CICs.

Figure 4: Households paying rent for shelter



Over one-third of surveyed households reported paying rent for shelter, indicating reliance on informal market-based access to space. Nearly half of renting households (48%) reported paying more than BDT 1,000 (USD 8.2) per month. Renting was far more prevalent in Teknaf (81%) than in Ukhiya (23.2%).

7.1. INFORMALITY AND LACK OF WRITTEN AGREEMENTS

FGDs across multiple camps reveal that rental arrangements are almost entirely verbal, with no written agreements or proof of payment. Participants repeatedly emphasized that such informal systems expose them to exploitation and uncertainty. In Camp 8W and Camp 15, new arrivals reported paying monthly rent between BDT 1,000 (USD 8.2) and 2,000 (USD 16.4), while some paid a lump sum of up to BDT 10,000 (USD 82) for a temporary shelter space, perceived as allowing longer-term use without the need for monthly payments.

In one FGD, a participant explained: *"we had no choice but to pay, because there were no empty shelters left. The Majhi said this was between us and the person renting."*

KIIs confirmed that older refugees and host community members often act as informal landlords. A community leader from Camp 26 stated that *"renting is common but hidden; people pay each other quietly because it is not allowed officially."* Several KII respondents highlighted that such transactions are difficult to monitor or prevent, as both parties benefit — the landlord gains income, and the tenant gains temporary shelter security.

90% of renting households reported having no written agreement

Household survey findings confirm that rental arrangements are largely informal: while 37% reported paying rent, 90% of renters reported not having any written rental agreement, with higher informality reported in Teknaf (95.9% of renters without an agreement).

7.2. ECONOMIC BURDEN AND COPING MECHANISMS

Paying rent imposes a heavy financial burden on new arrivals, many of whom have no income-generating opportunities in the early months after settlement. Under the encampment policy and given the limited availability of work in and around camp areas, refugees remain largely dependent on humanitarian assistance, with minimal or no income. Livelihoods and skills development programmes do not adequately meet actual needs. In 2025, only 8.4 per cent of people in need were targeted through livelihoods and skills development programmes for refugees, excluding new arrivals. FGDs revealed that households often borrow money or sell some of their food assistance to be able to cover rent costs. Women participants in Camp 12 explained that they *"sometimes skip meals to save for rent",* while men reported engaging in casual labor in nearby host communities despite movement restrictions.

For families unable to pay rent, eviction or forced relocation is a frequent outcome. One FGD participant described being told to vacate immediately after missing a payment: *"the landlord said if we cannot pay next month, we must leave. We didn't argue; we just moved to another place."*

Every week, there are new complaint about rent increases or unpaid rent.

Key informant

7.3. GENDER DIMENSION OF RENTAL PRACTICES

FGD and KII data underscore that women face specific vulnerabilities in rental arrangements. Female-headed households often have fewer negotiation options and are more likely to depend on verbal promises or mediation through male community leaders. As a result, their tenure security is weaker, and they face higher risks of harassment or eviction. Within this context, informal rental practices were identified as potential risk factors for GBV, as women and girls face increased vulnerability due to unequal power dynamics in these arrangements

In Camp 15, women in FGDs shared that some landlords exploit their situation, demanding additional payments or favors. One participant stated: *"as a woman alone, I can't argue about the rent. They say if I complain, I can leave and find somewhere else."*

KIIs also revealed that female tenants rarely participate directly in rent negotiations; instead, agreements are often made by male relatives or community representatives. This limits women's ability to contest unfair terms or report disputes. A community leader in Camp 27 observed that *"many women tenants come to us crying because they are told to leave without reason."*

Severe rent pressure and insecure tenure have led some newly arrived households to adopt negative coping mechanisms, including coerced marital arrangements linked to shelter access, with confirmed instances reported in some camps, in order to secure accommodation or meet rental costs. Quantitatively, this gender inequality is reflected in the slightly higher rate of female-headed households reporting eviction threats (19%) compared to male-headed households (14%).

3 in 10

women of surveyed adults reported that their household is paying rent for the shelter they currently live in.

4 in 10

men of surveyed adults reported that their household is paying rent for the shelter they currently live in.

3 in 10

women have received PSEA messages, and only 1 in 5 know where to report concerns about abuse or exploitation.

7.4. LEGAL AND GOVERNANCE GAPS

Both KIIs and FGDs pointed to a policy vacuum regarding rental practices. In the absence of formal shelter allocation processes and amid illegal rental arrangements in the camps, which has allowed informal markets to thrive. Camp officials interviewed acknowledged the issue and noted that enforcement is challenging due to limited staffing and the lack of alternative shelter options for new arrivals. One CiC official stated that *"even if we stop people from renting, they still find a way — because they have nowhere else to go."* Community members and key informants further reported that these practices are widely known and perceived that humanitarian actors are aware of them, with responses largely limited to protection monitoring and mediation in the absence of an approved framework regulating rental practices in the camps by relevant government authorities, including land and RRRC.

8. EVICTION

The assessment reveals that eviction is one of the most frequent HLP challenges faced by new arrivals. Overall, 10% of the respondents reported having already been evicted or forced to relocate since arriving in Bangladesh. Women headed-households were 3% more affected by eviction than male-headed households. In addition, 16% of the respondents reported having received an eviction threat, although eviction had not yet materialized. Nearly half of respondents (47%) reported being worried about future eviction, even if they had not yet experienced eviction or received a threat.

FGDs also reveal new arrivals being at higher risk of eviction. One FGD participant noted: *"there are cases where multiple individuals claim ownership... [then] we are told to leave and move to another place."* Another explained the fluidity of the situation: *"we took shelter in Teknaf. People told families to move at night with their children and elderly parents."* KIIs also corroborate these dynamics, pointing to duplicate or contested shelter claims, non-payment or sudden rent increases, and occupancy without CiC authorization as common triggers. One KII noted, *"yes, there have been cases of evictions involving newly arrived families... some were asked to vacate."* While men more often express fear about future eviction (likely reflecting their greater mobility and exposure to negotiations), women experienced sharper protection impacts when evicted. These included being forced to move at night, the separation of households across blocks, and the loss of informal tenure or verbal permission to occupy shelter spaces.

The assessment indicates that eviction is primarily driven by the lack of formal shelter allocation for new arrivals, which leaves households without administrative support and compels them to rely on informal rental arrangements within both refugee and host communities. This reliance on informal tenure increases vulnerability to land claims by host community members, rent-related pressures including delayed payments, and heightened exposure to environmental risks.

Figure 5: Reported reasons for eviction

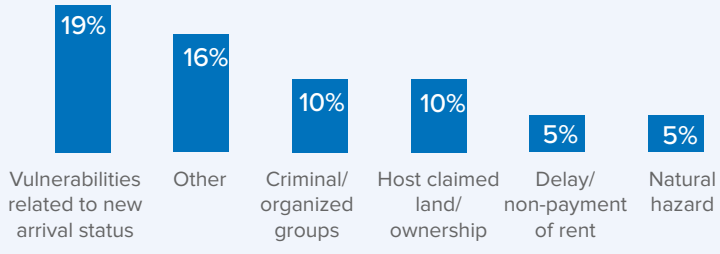
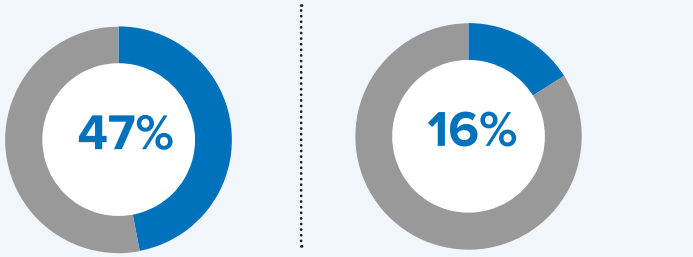


Figure 6: Households reported worried about eviction



When asked who they think are involved in them being evicted, the respondents most frequently cite CIC, host community members, Majhis, organized groups, and other actors, indicating that both community and institutional stakeholders are involved once disputes escalate. Consistent with FGD and KII accounts, most cases appear to originate informally, through verbal permissions, rental disagreements, or overlapping property claims and remain under-documented unless tensions rise to a level that prompts formal intervention.

9. SECURITY OF TENURE

Tenure for new arrivals is largely informal and undocumented, as highlighted by household responses to the questions on payment of rent and possession of a written rental agreement. Among the households that pay rent, the majority report verbal arrangements rather than written contracts, leaving renters exposed to unilateral rent increases, eviction without notice, and difficulty proving past payments. Between July and December 2025, a total of 165 cases of unilateral rent increases were recorded. Similarly, written proof of ownership is not a practice among those who report having purchased a shelter. Even where payments are made in the form of monthly rent, lump-sum contributions, or one-time purchase payments, tenure security remains weak, as agreements are rarely formalized and are not recognized by camp management.

In FGDs across Camps 12, 15, and 26, participants described accessing shelters informally "*asking around for any empty space*" and relying on verbal permission from a Majhi or an informal payment to an older refugee. As one participant explained, *"we never signed anything, only a verbal agreement"*. Such informal practices create confusion about rights: some households believe they are only borrowing the space, while others assume that paying rent or a one-time contribution gives them right to permanent use.

KIIs with community leaders and CiC staff confirm that land management and land administrative systems are weak, with no centralized record of occupancy, overlapping permissions, and even duplicate allocations. One leader reported that *"the same space was given to two families by two different people, one claims to be the owner, the other says the Majhi gave him authority"*. In this environment, even families who pay regularly have no proof of tenure and cannot defend their claims when disputes arise.

The issue is more severe for female-headed households, who are less likely to obtain written documentation or negotiate directly with community leaders. FGDs in Camps 8W and 27 revealed that women rarely approach Majhis themselves: *"the majhi talks only to men... I had to ask my brother-in-law to speak for me."* As a result, women often have weaker bargaining power and are more likely to be displaced during disputes. KIIs with protection and legal aid actors confirmed that women are under-represented in formal complaint systems and are frequently the first to be relocated when land disputes occur.

Women reported limited ability to negotiate shelter arrangements directly, with tenure often mediated through male relatives or intermediaries.

Resident in Camp 8W.

10. HLP DISPUTE RESOLUTION MECHANISMS

HLP-related disputes among new arrivals are being resolved primarily through informal, community-based structures. A clear majority (61%) said they would first approach a Majhi or Imam, compared with 14% who would go to the CICs and only 5% said they would seek humanitarian or legal aid actors. While 20% do not know where to seek help.

FGDs consistently described informal mediation as the entry point. Participants in Camp 12 said, *"the Majhi is the only one who listens when two families argue over a shelter"* and emphasized accessibility and speed over procedure. Yet both FGDs and KIIs highlighted the limits of this system as outcomes heavily depend on individual leaders, decisions are rarely documented, and women rarely participate.

As one woman in FGD in Camp 8W explained, *"even if the problem is about my shelter, I can't go alone to the majhi. They tell us to send a man to talk"*. Formal avenues were described as less accessible. Participants in an FGD in Camp 26 explained, *"the CIC listens but always says it's a community issue. We don't see any result"* with CICs and partners tending to engage only when tensions escalate or cases span multiple blocks.

KIIs with community leaders and humanitarian staff corroborate that most disputes begin informally and remain under-documented unless they trigger wider security concerns.

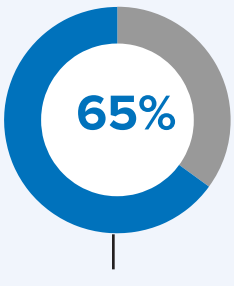
> **"The Majhi is the only one who listens when two families argue over a shelter"**
>
> *Resident in Camp 12*

11. PSEA AWARENESS AMONG NEW ARRIVALS

The assessment reveals substantial gaps in awareness of protection from sexual exploitation and abuse (PSEA) among newly arrived refugees and host communities in Cox's Bazar. Only 35% of new arrivals reported receiving PSEA messages, 29% of women and 38% of men surveyed, while just 21% knew where to report sensitive issues (18% of women, 21% of men). In contrast, the elderly refugees demonstrated higher awareness through NGO sessions and community meetings. Host community members in Alikhali (near Camp 25) and Palongkhali (Ukhiya) reported receiving no information at all. Low awareness of PSEA among new arrivals has direct implications for HLP risks.

Informal shelter arrangements, overcrowding, and unregulated rental practices place new arrivals in situations where power imbalances are common and safeguards are weak. Limited knowledge of PSEA reporting mechanisms, particularly among women, reduces the likelihood that exploitation or abuse linked to shelter access, rental arrangements, or dispute resolution will be reported or addressed.

Figure 7: Households receiving PSEA information/ messages



Not receiving PSEA information/ messages

Around two-thirds of new arrivals reported not having received PSEA messages, including 71% of women and 62% of men. Awareness of where to report SEA concerns was also low, reported by only 18% of women and 21% of men.

12. RECOMMENDATIONS

- Advocate with the Government of Bangladesh for additional land space and full registration to ensure newly arrived refugees can access adequate shelters.
- Advocate with the Ministry of Land, Ministry of Environment and Forests, and the RRRC to support land demarcation and strengthen inter-agency efforts on tenure arrangements for newly arrived refugees. This includes mapping informal shelter zones, clarifying overlapping land use, and promoting interim solutions to reduce eviction risks.
- Revise the shelter allocation SOPs to ensure waiting lists are respected and safe site selection with proper access to services and hazard-aware layouts is guaranteed.
- Activate block-level early-warning for rent and occupancy disputes and clear referral triggers from Majhis to CiC/protection/legal aid.
- Any eviction or relocation should adhere to minimum procedural safeguards, in line with international standards. This includes providing affected individuals with advance written notice, clearly stating the reasons for the eviction, and ensuring a reasonable notice period. Where written procedures are not feasible, verbal communication should still be timely, transparent, and coordinated with protection actors to mitigate harm.
- Establish female focal points or train women leaders at block level to facilitate confidential intake, safe referrals, and targeted support for female-headed households.
- Monitor informal rent-related practices and associated protection risks; prevent unlawful or exploitative rent charges, including the charging of rent for shelters located on public land occupied by refugees, which should remain rent-free; and support mediation, advocacy, and legal literacy on complaint mechanisms and early signs of exploitation, particularly for new arrivals. Any rental arrangements involving private land owned by host community members should be guided by applicable national legislation
- Strengthen the capacity of existing help desks at high-traffic service points to identify and address HLP-related issues or refer cases through appropriate channels. Link shelter and NFI assistance with case management systems, ensuring all referrals are sensitive to GBV risks.
- Regularize, where feasible, self-built/informally purchased shelters; where not, provide contingency relocation to available safer sites.
- Expand HLP awareness raising, legal assistance, including mediation and collaborative dispute resolution inside and around the camps through coordinated efforts by HLP and protection actors.
- Monitor HLP situations and alert on groups at higher risks like female-headed households including the different dynamics impacting HLP in Teknaf and Ukhyia.
- Strengthen messaging for new arrivals at registration desks to clearly communicate that all humanitarian assistance is free of charge, SEA is strictly prohibited, and safe, confidential reporting channels are available. Key messages can be accessed here: **PSEA Network Key messages**.
- Strengthen inclusive awareness and referral mechanisms by expanding visibility of formal reporting channels (helplines, complaint boxes, focal points) and training Majhis and CiCs on safe referral and confidentiality, ensuring outreach also covers nearby host communities.

About partners

The data collection process represented a joint effort of several active HLP WG members, reflecting strong inter-agency coordination. The following organizations contributed to this exercise: United Nations High Commissioner for Refugees (UNHCR), International Organization for Migration (IOM), Norwegian Refugee Council (NRC), Danish Refugee Council (DRC), International Rescue Committee (IRC), ActionAid Bangladesh, Oxfam and Mukti Cox's Bazar. Their combined efforts ensured wide geographic coverage, inclusivity in respondent selection, and a robust evidence base to inform HLP analysis and future programming.

For more details about the HLP report or related inquiries, please contact:

Ezzatullah Raji
HLP Technical Advisor, Protection Sector
Email: ezzatullah.raji@nrc.no

Johanna Reina Picalua
Protection Sector Coordinator, Protection Sector
Email: reina@unhcr.org

More details about HLPWG activities and updates can be found on the Rohingya Response website: https://rohingyaresponse.org/hlpwg