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Corruption risks in Cash for Work programmes

Query

What are the biggest corruption risks in Cash for Work projects and how can they be mitigated? I am especially interested in risks concerning the selection of the beneficiaries of those activities as well as the mechanisms/tools to minimise those risks.

Content

Caveat

There is little documentation of corruption risks in Cash for Work programmes, as the literature focuses more broadly on cash transfer programming.

Summary

Primarily used in humanitarian interventions, Cash for Work programmes refers to short-term interventions providing temporary employment in public projects to the most vulnerable segments of a population. While donors are sometimes reluctant to consider such cash-based approaches due to perceptions that they may be more vulnerable to corruption and theft, there is little evidence that cash-based interventions are more prone to corruption than other forms of assistance. As with other cash-based interventions, Cash for Work programmes have been promoted as a cost effective approach likely to limit corruption opportunities by eliminating the role of intermediaries along the implementation chain and reducing corruption risks associated with procurement, storage and transport of in-kind assistance.

However, these interventions face other types of corruption challenges, especially at the targeting phase of the programme, such as targeting criteria, corrupt inclusion or exclusion of beneficiaries, or multiple or "ghost" registrations and workers as well as challenges in the transfer of cash.

Addressing corruption challenges in Cash for Work programmes involves establishing clear, transparent and efficient targeting mechanisms, choosing reliable and context-specific cash distribution systems, ensuring transparency and participation of beneficiaries and putting robust monitoring and evaluation systems in place.

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1. Corruption risks in Cash for Work programmes

Benefits and challenges of Cash for Work programmes

The use of cash as a relief tool has become a viable programming option in humanitarian interventions, enabling people to decide for themselves what they most need and to buy it in local markets. As part of cash transfer programming modalities, Cash for Work (CfW) programmes provide temporary employment in public projects (such as repairing roads or rebuilding infrastructure) to the most vulnerable segments of a population in exchange of cash.

While it is a relatively new approach compared to Food for Work (FfW) or in-kind distribution programmes, there are a number of expected benefits of CfW programmes (Mercy Corps 2007; ODI 2007):

- Empowerment of beneficiaries: beneficiaries receive direct cash transfers that enable them to make their own choices and set their own priorities. It is not rare in in-kind programming that individuals sell their relief packages (often under their real market value) to address more urgent priorities such as health care.
- Poverty alleviation: CfW programmes provide short-term employment opportunities for large segments of affected populations, supplement incomes from other sources and help reduce seasonal income variability (Standing 2012).
- Rehabilitation of assets: CfW programmes are used to rebuild damaged community assets and result in the construction of public infrastructure.
- Community engagement and participation: communities are involved in reconstruction works and thereby have ownership of the project, involving large numbers of community members, including women.
- Stimulation of the local economy, supporting local businesses through the purchase of local goods.
- Efficiency and ease of administration: such programmes can also be implemented with fewer delays than food aid as cash can be transported more rapidly than food, speeding up assistance to eligible beneficiaries. Such approaches are also believed to be more cost effective than in-kind forms of assistance by lowering transaction and distribution costs. A recent study of value for money of cash transfers in emergencies confirms that compared to in-kind approaches, cash-based interventions consistently emerge as more efficient to deliver relief (Cabot Venton, Bailey and Pongracz 2015).

There are also some risks and challenges associated with Cash for Work programmes:

- Corruption, fraud, and diversion (see below): cash may be more attractive to theft/corruption than in-kind assistance given its fungibility, including by agency staff. Cash can also be diverted to illegal activities more easily than in-kind assistance. However, there is little evidence that cash-based responses are riskier than other approaches or in-kind assistance (EU 2015; UNHCR 2015; UNICEF 2006).
- Local market distortion: the injection of cash in the local economy can lead to hikes in prices of key goods, price distortion in local markets and inflation, deteriorating the purchasing power of recipients over time. However, a study of unconditional cash transfers in 15 Eastern and Southern African countries provided no evidence of such inflationary effects of cash transfers (Devereux et al. 2005).
- Negative influence on cultural norms by changing traditional responses to emergency situations based on solidarity and volunteerism.
- Biased targeted population, excluding the populations that are not fit for work such as the sick, the elderly or the disabled. Women may also have limited access and not equally benefit from such schemes due to their child care duties. Critics also argue that CfW programmes may lead to poor targeting, excluding those who need them most as the best connected would be in a better position to apply and gain from the programme (Standing 2012).
- Labour conditions, work safety and fair pay: there are also risks of unsafe work site

locations, child labour, sexual abuse, exploitation, harassment, etc., (Women's Refugees Commission 2013).

- Some critics also argue that CfW can be a short-term solution that often involves "make-work" activities that have no economic justification (Standing 2012).
- Fuelling dependencies, diverting beneficiaries from their traditional livelihoods, leading them to rely on such programmes as a primary source of income.
- Staff and beneficiaries' safety: there are risks involved in handling cash, creating security issues (e.g. attacks, extortion) for both the implementing agency and beneficiaries, especially in conflict and predatory political economies (ODI 2007).
- "Anti-social use": cash can be used for anti-social purposes, such as buying alcohol, tobacco or other "temptation" goods. However, a review of 19 studies found either no significant impact or a significant negative impact of transfers on temptation goods (Evans and Popova 2014).
- Sustainability: unlike emergency programmes, which are by nature temporary, cash transfer programmes typically need to be implemented over longer periods of time for poverty alleviation, which may pose challenges of sustainability. Cash transfer programmes are also expensive to administer during the start-up phase, but the implementation costs decrease over time (Hyun H. Son 2008).

Cash-based programmes as a tool against corruption

In recent years, cash transfers programmes have been promoted as a cost effective way to deliver social programmes with a potential to reduce corruption by limiting the role of intermediaries and eliminating most links in the implementation chain. As resources pass through fewer hands, being directly transferred from administrative offices to recipients, officials have fewer opportunities to use the programme resources for personal gain. Such direct cash transfers are also believed to be less likely to be subject to political interference (Grimes and Wängnerud 2009).

Corruption risks associated with the procurement, storage and transport of goods may be minimised by using cash transfers (ODI 2015). In contexts where corruption is high, especially in fragile and conflict-ridden environments where food or in-kind assistance are vulnerable to seizure by armed groups cash may be delivered more securely than in-kind aid, limiting the risks of diversion or looting during procurement and transport (ODI 2007).

The use of banks and other financial institutions potentially reduces the security and corruption risks associated with cash transfers, with recipients collecting their cash from banks more safely, conveniently and discreetly rather than receiving assistance during highly visible distributions. Cash transfers that go directly to bank accounts may also provide greater opportunity for scrutiny. As the amount of the transfers are known to everybody, any deduction or non-delivery is likely to be visible and traceable, providing a deterrent to intermediary corruption (Standing 2012).

Indeed, an assessment of a conditional cash transfer programme in Mexico suggests that using cash transfers has had some success in mitigating administrative corruption in social welfare programmes, with a significant reduction in respondents reporting having paid bribes to become beneficiaries of public welfare programmes after the expansion of conditional cash transfers (Grimes and Wängnerud 2009).

In the longer term, there is also a growing body of evidence suggesting that cash-based welfare programmes, especially those with a universal coverage (rather than more targeted interventions) have the potential to empower beneficiaries, increase trust in political institutions and support citizens' participation in elections and civic associations (Grimes and Wängnerud 2009).

Corruption risks in Cash for Work programmes

However, concerns have been raised on whether cash-based assistance is more prone to corruption or diversion than in-kind assistance or on how such forms of assistance may affect intra-household or community dynamics.

While there is a broad consensus in the literature that cash-based responses are not riskier than other approaches in terms of corruption (EU 2015; UNHCR 2015; UNICEF 2006), practical experience suggests that such programmes present specific implementation challenges from a governance and anti-corruption perspective.

Cash-based assistance programmes are administratively complex, usually large in scope, involving a large number of financial transactions and multiple actors are involved in the process, making these programmes prone to risks of errors, fraud and corruption. These risks are most likely to emerge in the areas of targeting, registration, compliance monitoring, and payment systems (World Bank 2011).

Lack of skills and capacity

Implementing cash projects requires significant administrative capacity and different skills and capacities than in-kind forms of assistance. When controls and accountability mechanisms are weak, corruption can occur (World Bank 2011). While the logistical challenges are often easier to manage, there may be a need for additional finance capacity. State-run cash transfer programmes are often located in government departments with little managerial capacity or bargaining power within government, creating risks of errors, fraud and leakages (Devereux et al. 2005).

Lack of transparency

Lack of transparency on how the programme operates and its eligibility criteria can also create opportunities for corruption and increase the likelihood of manipulation of beneficiaries, unaware of their rights and entitlements, and diverting funds for private or political gain (World Bank 2011).

Targeting and registration

Corruption in the targeting phase is a major risk for any social welfare programme, giving scope for discretionary activities by bureaucrats in charge of interpreting the policies and eligibility criteria and making judgements on who to help and who not to help. It manifests through various forms, including bias in targeting criteria, corrupt inclusion or exclusion of beneficiaries or multiple or "ghost" registrations (Transparency International 2010).

Given limited public resources, transfers should in principle be targeted at those who need them most. In practice, some experts argue that this is expensive and difficult to achieve, and is potentially divisive, especially in situations of political or social insecurity, affecting people's status in the community and relations between beneficiaries and non-beneficiaries (Devereux et al. 2005).

Identifying the target group may be further hampered by lack of data or technical expertise which may be lacking in cases of emergencies. Because cash is considered to be more attractive to everybody, targeting may be even more challenging in cash transfer interventions as even the wealthy may want to be included in the scheme, making such programmes susceptible to capture by the elites. As already mentioned, if the payments for work are attractive enough – as they should in principle be in "ethically grounded" programmes, the better connected will want to gain from the programme and are likely to be in a better position than poorer or marginalised groups to benefit from the intervention, resulting in poor targeting (Standing 2012).

At the registration level, there are also risks of collusion with programme staff to target the "wrong" beneficiaries, creating "false" beneficiaries or asking for bribes or for a proportion of the assistance in order to be included in the project (ODI 2015). Corruption at this level may involve registering ineligible beneficiaries to gain political support, accepting illegal payment from eligible or ineligible beneficiaries or diversion of funds to ghost beneficiaries or through other illegal channels. Fraud can also occur when beneficiaries make false statements or distort information to become eligible (World Bank 2011).

In an investigation of a Cash for Work programme implemented in Haiti, a study found that 30% of the beneficiaries reported having to pay a kick-back for getting or keeping their jobs while 10% of women beneficiaries reported knowing of cases of sexual extortion. Many reported that to "To get a job, you need a personal connection to a foreman" (Haiti Grassroots Watch 2010).

However, in practice, the literature suggests that targeting cash projects does not seem to have been more problematic than targeting in-kind assistance (ODI 2015; ODI 2007). Some authors argue that, unlike conditional transfers or Cash for Work transfers, direct universal cash transfers would have the potential to minimise problems of leakages at the targeting phase by reducing the discretionary power of bureaucrats in charge of targeting (Standing 2012).

Payment systems and diversions of cash

Cash can be taxed or seized by elites or militia, easily diverted, stolen or extorted. In areas where there are no ATMs, bank officials could also charge illegal fees to beneficiaries to access over-the-counter payments (World Bank 2011). It is expected that the management of large sums of cash can present new threats to the integrity of staff. During the Somalia crisis of 2011-2012 for example, while there were concerns that cash could be diverted by local terrorist groups, in practice the greater risk came from within, where agency staff was remotely managed and monitoring was compromised, with greater opportunities for corruption. Breach of payment protocols also occurred, including payment levels below the allocated amount per household (UNICEF 2013).

While vouchers are considered to be safer, there are also risks of fund diversion when pre-agreed traders collude to artificially inflate the prices of local goods or when beneficiaries sell vouchers to access cash (Cabot Venton, Bailey and Pongracz 2015). While usually considered to lower the risk of theft/corruption, vouchers can also be counterfeited (UNHCR 2015).

Assessing whether cash can be delivered safely by agencies, and spent safely by recipients is essential for the effective implementation of Cash for Work programmes. However, there are a number of ways to mitigate such risks using electronic payments that can be better traced than physical cash or in-kind transfers, mobile banking services, sub-contracted security companies and remittance and money transfer companies (see below) (ODI 2007 and ODI 2015).

Ghost workers and beneficiaries

In CfW schemes, there is also the possibility of billing the central agency more money than required by the programme by inflating the number of workers on the job site. The attendance sheets can be falsified, registering more workers present on the construction site than in realty, using “ghost” workers: individuals who are reported as present on timesheets but are not actually working (Mercy Corps 2007).

Funds can also be diverted by agency staff by various means such as ghost villages and beneficiaries. Although not frequent, these cases have been identified by the evaluation team of the cash and voucher responses to the 2011-2012 crisis in Somalia (UNICEF 2013). Ghost beneficiaries were included in the programme, with false names or beneficiaries who were not informed about the project and their entitlements, and did not receive any funds.

Political corruption

As with any welfare policy, there is a risk of political manipulation of the policy. Cash-based programmes are perceived to be more vulnerable to political manipulation and clientelism, as such interventions are usually very popular among beneficiaries, providing politicians with incentives to use cash transfer schemes to reward political support and secure electoral outcomes. Payment levels can be adjusted prior to the elections to secure political support for the government in office (Standing 2012). When targeting methods lack transparency, politicians may also find ways to target specific communities for political reasons. Politicians can also find ways to register supporters and exclude opponents (World Bank 2011).

2. Mitigation strategies

Preventive measures can be devised to minimise risks of leakages and ensure sufficient resources and capacities are allocated to the various phases of implementation, from targeting to monitoring (World Bank 2011).

Risk mapping and mitigation measures at the planning stage

Preventing fraud and corruption in cash-based schemes involves systematically mapping corruption risks at all stages of the programme cycle and designing strategies to address these risks from the planning stage.

Risk mapping and assessments

Good practice involves conducting in-depth assessments before setting up such social assistance programmes, including an analysis of key risks to ensure that safeguards are put in place to prevent corruption. This includes analysing existing systems for financial management, transparency and accountability.

Process risk mapping is a tool that can help identify vulnerabilities in key stages of programme implementation, including at decision-making points where programme implementers at the national or sub-national levels have a high degree of discretion. This mapping exercise can help design targeted mitigation measures. This approach has been used in the Philippines (World Bank 2011).

Selecting the partners

It is also important to identify local partners in a manner that limits corruption risks. Partnering with local NGOs can facilitate an effective response, especially in the case of emergency situations. Local NGOs can get mobilised rapidly, can often access remote populations and help mitigate the risk of cultural inappropriateness by informing programme design with their knowledge of local practices and preferences. However, local partners may not possess the administrative or programme skills required to implement CfW projects and increased training and monitoring may need to be conducted by the international agency (Mercy Corps 2007).

As NGOs take on a greater role as implementers of development assistance, it is also important to assess their integrity and anti-corruption policies and practices. While there is no distinct assessment framework, there are some key elements that anti-corruption policies of NGOs should cover, namely: commitment to zero tolerance of corruption, definitions of corruption, codes of conduct and expected behaviour vis-à-vis corruption, conflict of interest provisions, complaint and whistleblowing mechanisms, transparency mechanisms, sanctions, due diligence processes and an implementation strategy (Lindner 2015). Previous Helpdesk answers have been compiled on assessing anti-corruption policies of NGOs and key features of NGO accountability.

Other mitigation strategies

More generally, mitigation strategies to avoid fund diversion can include establishing strict protocols and procedures, build staffs' technical and financial capacities and ensure division of responsibilities (e.g. NGO for registration and monitoring, money business services for money transfer etc.) (UNHCR 2015).

Clear, transparent and efficient targeting mechanisms

A simple, efficient and objective targeting system with clear and transparent eligibility criteria based on independently verifiable instruments can help ensure that resources are allocated to the intended beneficiaries of the programme and reduce opportunities for political manipulation and discretion for selecting beneficiaries. Clear and unambiguous eligibility criteria are also easier to communicate to the beneficiaries and raise their awareness of their rights and entitlements.

Good quality data is a pre-requisite for accurately identifying eligible beneficiaries. In the Philippines, for example, a transparent and standardised household targeting system was established consisting of a database of poor households and a specialised automated management information system to support the targeting operations. Data quality was ensured by checking the consistency of information and running validation routines to control quality. An objective targeting method was used, statistically estimating the household income based on relevant proxy variables and comparing the estimated income to a poverty threshold. The system was combined with geographic targeting to identify the poorest areas of the Philippines (World Bank 2011).

One validation approach can be to involve local communities in the selection of beneficiaries, such as the verification process by local assemblies and communities implemented in Zambia (Schubert 2005). Here, the targeting and approval process was done entirely through the Public Welfare Assistance Scheme (PWAS) structures, consisting of a hierarchical framework of voluntary committees. The Community Welfare Assistance Committees (CWACs) were elected or approved by the community and operated at the village-level using a multi-stage participatory process to identify the most needy and incapacitated 10% of households living within their area.

The first stage of this process involved interviewing all potential beneficiaries and documenting their household structure and level of poverty on a standardised form. These households were then ranked according to the severity of their destitution. The vertical effectiveness of this system of targeting was found to be very high and has been effective in targeting intended beneficiaries of the programme and selecting households that are critically poor. Spot checks have found very few cases where households did not fully meet the target group criteria.

Reliable cash distribution

It is also important to plan cash distribution in a way that limits risks of theft and diversion and choose a safe and reliable method to distribute cash, based on an initial assessment of availability of reliable financial mechanisms for cash delivery, location of the beneficiaries, and frequency of payment and beneficiary preferences (Mercy Corps 2007). Practitioners recommend letting beneficiaries monitor the distribution process as well as having programme officials present at the distribution points (Transparency International 2010; UNHCR 2015).

Direct cash distribution

In direct cash distribution systems, the choice of distribution site and days (particularly if a bank/post office system is not being used) is critical in terms of reducing security and corruption risks.

In direct cash distributions, while people should know roughly when the distribution will take place, so they can make plans to be there, they should be informed shortly before the distribution of the exact time and location to minimise security risks (ICRC and International Federation of Red Cross and Red Crescent Societies 2007). Other distribution practices can also limit security risks, such as varying distribution days and locations, smaller/more frequent transfers to reduce the amount of money transported, etc.

Agencies can also use local distribution mechanisms such as hawala agents (hawala remittance systems are informal banking arrangements that allow the transfer of funds both domestically and internationally without using formal financial institutions) and other remittance systems, as has been successfully implemented in Somalia and Afghanistan (ODI 2015). A number of additional measures can be taken if direct cash transfers are found to be diverted, such as reverting to voucher programming, watermarking vouchers to avoid counterfeiting and using biometrics (e.g. finger prints and iris scanning) for identity verification to reduce duplication (likelihood that recipients receive more than one transfer) and impostering (UNHCR 2015).

Electronic cash transfers

Many organisations are moving away from the manual distribution of cash and paper vouchers and are increasingly exploring the use of electronic transfers as a more efficient and safer way to deliver cash-based assistance. While e-transfers are not feasible in all settings, due to the infrastructure they require and the time they take to set up, they have shown to significantly reduce theft and the risks associated with transport of cash and for beneficiaries to travel to a distribution location. They also eliminate the need to count cash and related errors. They are also popular with beneficiaries because of the privacy they afford (ODI 2015).

However, the distribution methods are highly dependent on contextual issues. Despite expectations that technology and electronic transfers could lower cost and improve efficiency in cash transfer programming, a study comparing three different cash transfer mechanisms (physical cash, electronic vouchers and mobile money) used in one humanitarian programme in the Democratic Republic of Congo demonstrates that in challenging environments, they can have quite the opposite result.

In the DRC, e-transfers took longer to implement, made programme implementation more expensive and, in the case of mobile money, were also less reliable. Staff time used to manage both types of e-transfers as well as hardware and service fees for e-vouchers contributed to the higher costs compared to cash. While cash was the fastest, simplest and most straightforward to set up, it was not available to all programme participants because of security risks. E-vouchers worked reliably and offered an alternative where cash was unavailable or too risky. Though expensive for short programmes, their up-front costs could be offset in longer term programmes, and are expected to fall as demand increases (Mercy Corps and Oxford Policy Management 2014).

Transparency and participation of beneficiaries

Transparency and access to information

Providing stakeholders with timely and accessible information on all aspects of the programme's operations allows stakeholders to provide feedback and input at all stages of the programme cycle and facilitate the monitoring of financial flows, which builds trust among stakeholders. The agency can publish a transparency policy providing clear guidance to staff on which information must be made public, promoting the timely publication of information on all aspects of programming in a user-friendly, accessible and easy-to-understandable manner (Transparency International 2010).

When feasible, transparency involves: making beneficiaries aware of the eligibility criteria, principles and methods used for targeting; publishing the amounts beneficiaries are entitled to; budget and; distribution lists, rights and entitlements, complaints and redress mechanisms, etc. It also involves making sure that local authorities and community groups are present during cash distributions to ensure transparency and accountability.

Information technology can play an important role as relevant information on the programme's targeting and selection mechanisms, procedures and regulations, budgets, selected districts and beneficiaries can be published online.

Participation of targeted communities

The participation of targeted populations at all stages of programme design and implementation can be instrumental to mitigate corruption risks and facilitate CfW project implementation – especially targeting, supervision and monitoring. This can be done by identifying or setting up a community/village committee to act as a liaison and contribute local oversight of CfW activities.

Participation in such village committees should be voluntary. These oversight activities may include the monitoring of projects, hosting joint meetings with the aid agency to review progress on projects, addressing any problems that have arisen in implementation, and discussing emerging community concerns (Mercy Corps 2007).

Complaints and redress mechanisms

Internal feedback mechanisms and community complaints mechanisms are important tools to allow staff and community members to report suspected error or fraud without fear of reprisal (UNHCR 2015). These should include clear rules for handling complaints and the capacity to process and resolve complaints, impose sanctions as well as protect whistleblowers. Irrespective of the forms, procedures and channels for handling complaints, the mechanism should be transparent, independent, accountable, accessible, safe and easy to use.

Such complaints mechanisms can increase accountability to aid beneficiaries by providing them with the opportunities to provide feedback on the quality and quantity of the programme as well as to complain about potential wrongdoing. They need to be adapted to the local context, taking into account issues such as cultural norms and values, level of literacy, phone coverage, and social patterns, among others. Beneficiaries should also be consulted in the design of the complaints mechanism to develop appropriate culturally-sensitive and context-specific responses that identify and address the various barriers to reporting (Chêne 2013).

Addressing the issue of ghost workers

The issue of ghost workers can be addressed by unannounced monitoring visits carried out as part of routine programme management. This approach allows monitoring staff to document, report and investigate discrepancies between names reported on the time sheets and workers physically present at the site. In case of repeated incidents, it may be advisable to suspend CfW activities in that work site, to send a clear message to the local community about the consequences of widespread fraudulent activity on programmatic operations and helps maintain credibility in the project area. (Mercy Corps 2007)

Effective monitoring, oversight and supervision

Monitoring and evaluation (M&E) are key to assess if programme objectives have been achieved, ensure adequate controls, detect irregularities and assess the impact of the programme. Effective monitoring and evaluation systems look at: the process of delivering assistance; the design of the programme; the context/assumptions; the results/outcome; and the impact on beneficiaries and local economies. M&E activities can determine, for example, if payments reach the targeted beneficiaries, how the cash is being used, the impact of CfW activities on local market activity, and the effects of wage income in beneficiary households (Mercy Corps 2007).

Different monitoring approaches and methodologies can be envisaged, such as third-party monitoring or spot checks. The latter can improve quality control and correction mechanisms. Good practices include conducting periodic third-party ex-post reviews of key aspects of the programme. These spot checks consist of rapid evaluation of the quality, effectiveness and efficiency of programme implementation (World Bank 2011).

The ODI's Tsunami cash learning programme designed checklists used for post-distribution monitoring of Cash for Work, including: i) interviews with a randomly selected 5% of workers on their participation in the activities, payment and whether they were asked for a portion of their payment; ii) interview with non-workers; and iii) focus group discussions (separately with women, men, elderly/disabled, older children who wanted to work) on the selection process, use of the cash, payment, security, knowledge of the complaint mechanism, etc. (ODI no date).

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