

U4 HELDESK ANSWER 2026: 13

Third-party monitoring (TPM) and corruption

Challenges and best practices

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Third-party monitoring (TPM) has become an important oversight mechanism in fragile and conflict-affected settings (FCAS), where insecurity and access constraints often prevent donors from directly monitoring aid delivery. This Helpdesk Answer examines its uses, benefits, challenges, and corruption and governance risks. While TPM can strengthen accountability, improve the credibility of monitoring information and detect corruption related risks, such as aid diversion, fraud and political capture, it is itself vulnerable to bribery, collusion, conflicts of interest and manipulation of monitoring findings. Many of these risks arise from structural features of TPM rather than isolated misconduct. Practices that can strengthen the integrity and effectiveness of TPM include careful selection and training of monitoring providers, integration of TPM into broader accountability systems, greater transparency in data management and the use of technological verification and data triangulation to strengthen oversight.

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[Corruption in humanitarian assistance in conflict settings \(2024\)](#)

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[Aid diversion and corruption in Somalia \(2026\)](#)

Query

Please provide a summary of advantages, challenges and good practices related to the use of third-party monitoring (TPM) in fragile and conflict-affected settings (FCAS).

Main points

- Third-party monitoring (TPM) has become an increasingly important oversight mechanism in fragile and conflict-affected settings (FCAS) primarily because insecurity, access restrictions, weak institutional capacity and unreliable partner reporting often prevent donors from directly monitoring project implementation.
- Rather than replacing organisations' own monitoring systems, TPM is intended to complement them by providing independent verification and reducing information asymmetries.
- TPM encompasses a wide range of organisational models and monitoring techniques. Depending on the context and monitoring objectives, it combines qualitative and quantitative methods, people and asset focused monitoring, local or international providers, and increasingly uses digital technologies alongside more traditional monitoring approaches to triangulate findings and strengthen oversight.
- By providing an independent source of information from areas inaccessible to donors, TPM can strengthen accountability, improve the quality and credibility of monitoring data, support adaptive programme management and reduce information asymmetries between donors and implementing partners.
- Beyond its general monitoring role, TPM can help detect corruption related risks, such as aid diversion, fraud, ghost beneficiaries, political capture, manipulation of beneficiary selection and weak financial controls, and provide evidence that supports corrective action.
- While TPM can strengthen oversight in inaccessible environments, its effectiveness is constrained by operational challenges including limited access, data quality issues, weak information sharing, insufficient follow-up to monitoring findings, fragmented data governance and trust deficits between donors, implementing partners and affected communities.
- Evidence from FCAS shows that TPM arrangements may themselves become vulnerable to bribery, collusion, elite capture, extortion and manipulation or falsification of monitoring findings, particularly where oversight and quality assurance are weak.
- Many of these corruption and governance risks arise from structural features of TPM rather than isolated misconduct. Dependence on local intermediaries and patronage networks, incentives for positive reporting, conflicts of interest, and weak procurement and oversight of monitoring providers can all undermine the independence and credibility of TPM.
- Effective TPM requires careful planning and provider selection, capacity building, clear monitoring protocols, integration with existing monitoring systems and transparent data governance to ensure

monitoring quality, credibility and the effective use of monitoring findings.

- Although evidence on corruption specific safeguards remains limited, the literature suggests that combining TPM with technological verification, data triangulation, independent back-checks and broader accountability mechanisms can strengthen the integrity of monitoring and reduce opportunities for collusion, data manipulation and other governance risks.

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Introduction: Third-party monitoring (TPM)

What is TPM?

Third-party monitoring (TPM) has become increasingly common over the past decade, largely in response to humanitarian donors' efforts to address persistent knowledge gaps, particularly in high-risk and conflict-affected settings where organisations are often forced to manage programmes remotely (Diepeveen et al. 2025; Kelly and Gaarder 2017).

Although there is no universally accepted definition of TPM, Harrison (2020: 15) defines it as “the use of an independent organisation – typically in areas where the funder does not have access – to collect monitoring data in order to reduce risk and maximise performance and accountability”. TPM is therefore a narrower concept than monitoring, evaluation and learning (MEL), which encompasses monitoring, evaluation and learning conducted by a range of actors, including donors and implementing organisations. In contrast, TPM is undertaken by an independent third party that is neither the donor nor the implementing partner (Harrison 2020: 16). Its purpose is to provide an impartial assessment of project implementation and performance that complements information generated by implementing organisations and beneficiaries, both of whom have inherent interests in the success of an intervention (Kelly and Gaarder 2017; Diepeveen et al. 2025; KfV Development Bank 2025; Fahie 2026). In practice, TPM can provide donors with independent verification of implementing partners' reporting while also generating primary field data that supports programme adaptation and strengthens oversight (Sagmeister and Steets 2016).

TPM is typically carried out by non-governmental organisations (NGOs) or specialised private companies with the local knowledge, networks and access required to collect and verify information in areas that are inaccessible to donors or international implementing organisations (Hees et al. 2014; van Beijnum et al. 2018; Jenkins 2024: 33). Monitoring commonly involves interviews with beneficiaries and local stakeholders, site visits where feasible, document reviews and triangulation of multiple sources of evidence. In most cases, TPM focuses on verifying project outputs, implementation processes and compliance rather than evaluating longer term outcomes and impacts (Van Wicklin and Gurkan 2013; Vuylsteke 2021). While TPM is frequently used to strengthen financial accountability and sometimes

fiduciary oversight, it can also be designed to identify broader implementation, security and operational risks by incorporating targeted monitoring questions and verification mechanisms (Cliffe et al. 2023: 63; US GAO 2024).

The literature identifies several reasons for using TPM (ICRC 2020). First, it enables monitoring where donor or agency staff cannot safely access project locations because of insecurity, political restrictions or logistical constraints. Second, it provides independently verified information where there are concerns about the completeness or reliability of partner reporting. Third, TPM can complement the monitoring capacity of implementing partners where local monitoring systems are weak. Finally, it is frequently used for complex or high-risk programmes, including those with significant environmental risks, where independent oversight can strengthen accountability and improve programme performance (ICRC 2020: 4-5).

Growing donor emphasis on accountability has further contributed to the expansion of TPM (Kelly and Gaarder 2017). As Diepeveen et al. (2025) note, several high-profile cases involving the diversion and misuse of humanitarian assistance during the 1990s prompted donors to invest more heavily in monitoring and evaluation as a means of improving accountability to both crisis affected populations and taxpayers (see also Metcalfe-Hough et al. 2021). Accordingly, TPM is often described as providing the “eyes and ears on the ground” for organisations operating remotely (Steets et al. 2016). Beyond supplying information from inaccessible locations, it can strengthen accountability relationships between implementing partners, donors and affected populations while helping to reduce fiduciary, operational and reputational risks (Abdalla and ElSayed 2021).

At the same time, the literature consistently emphasises that TPM should not be viewed as a substitute for organisations’ own monitoring systems. Rather, it is generally regarded as a complementary mechanism that should be used primarily where direct access is constrained and where it demonstrably adds value (Kelly and Gaarder 2017; Price 2018; World Bank 2018; Sagmeister and Steets 2016).

The literature suggests that, before deciding to use TPM, organisations should first assess whether existing monitoring arrangements adequately address identified accountability gaps. Van Wicklin and Gurkan (2013) propose a four-step approach comprising:¹

- identifying the specific monitoring and accountability gaps that require independent verification

¹ Their discussion is broader, encompassing participatory monitoring and TPM. The description here is limited to TPM.

- assessing the political, social and operational context, focusing on political aspects (e.g. existing legal framework on transparency and accountability), social factors (e.g. willingness of project beneficiaries to provide feedback) and project specific factors (e.g. location, regarding access and security)
- selecting methods appropriate to both the monitoring objectives and operating environment of TPM
- determining implementation arrangements, including methodology, actors and budget

Structural reasons for using TPM in fragile and conflict-affected settings (FCAS) and beyond

Fragile and conflict-affected settings (FCAS) are characterised by higher implementation risks and weaker institutional capacity than more stable environments, increasing the need for independent oversight mechanisms such as TPM (Van Wicklin and Gurkan 2013: 9). Over the past decade, the use of TPM has expanded considerably in humanitarian and development programmes operating in FCAS, reflecting both growing access constraints and the declining physical presence of donors and international organisations in many conflict-affected areas (Abdalla and ElSayed 2021).

The most important structural driver behind the increasing use of TPM is restricted physical access. As discussed in the previous section, TPM is primarily intended for situations where donors or implementing organisations cannot directly monitor activities on the ground. Security threats, active conflict, logistical barriers or restrictions imposed by state or *de facto* authorities may prevent international staff from accessing project sites, creating significant information gaps regarding project implementation and outcomes (Harrison 2020: 16; Strand 2023). Under such circumstances, TPM can provide access to otherwise inaccessible or “no-go” areas through locally based monitors or organisations with greater acceptance and mobility (Harrison 2020; Strand 2023).

However, insecurity may also constrain the feasibility of TPM itself. Consequently, organisations should first assess whether the security environment permits independent monitoring before deciding to deploy TPM (Van Wicklin and Gurkan 2013: 9). For example, the review of the UK’s Foreign, Commonwealth & Development Office (FCDO) Monitoring, Evaluation, Research and Learning for Yemen (MERLY) project’s inception phase reported that consortium lead Tetra Tech concluded that in-person data collection would not be possible in northern Yemen

because consortium partners considered the security risks and access restrictions too severe to deploy field staff (FCDO 2025).

Where access is possible, but some level of insecurity persists, TPM may offer advantages over conventional donor monitoring. Compared with highly visible visits by international staff, locally based third-party monitors can often operate with a lower profile, reducing security risks for both monitors and local communities while facilitating more regular access to project sites (Sagmeister and Steets 2016: 13).

Beyond overcoming access constraints, TPM can strengthen the quality of monitoring by providing complementary information on project implementation. Standard monitoring systems often focus on quantitative indicators of outputs and outcomes but are less well suited to identifying more nuanced implementation challenges, such as beneficiaries' experiences, unintended effects or whether communication and outreach activities effectively reach target populations (Van Wicklin and Gurkan 2013: 3). Independent monitoring can therefore provide additional qualitative evidence that complements routine reporting and contributes to programme adaptation and improved project effectiveness.

A further structural rationale for TPM is the limited reliability of available information in many FCAS, as national data collection systems may be captured by political interests, resulting in fabricated statistical data (Strand 2023). These limitations may extend to the monitoring data of implementing partners. For example, an online survey conducted under the SAVE research programme found that more than half of international aid agencies working in insecure environments were either "not so satisfied" or "not satisfied at all" with the monitoring and evaluation systems of their implementing partners, highlighting the demand for independent verification of reported results (Sagmeister and Steets 2016: 13). For example, in South Sudan, third-party monitors conducted lot quality assurance sampling (LQAS)² household surveys to measure health outcomes in the absence of reliable national survey data (Abdalla and ElSayed 2021).

Finally, the institutional characteristics of many FCAS further increase the demand for independent monitoring. Weak state oversight, limited administrative capacity and high levels of corruption may increase the risks of aid diversion, misuse of resources and weak implementation oversight (Harrison 2020; Strand 2023).

In these settings, TPM can also contribute to institutional learning by generating independent evidence that supports government counterparts and implementing

² LQAS is a random sampling methodology mainly used in the public health context nowadays to assess the quality of a product, specifically whether a group of items ("lots") satisfies set targets (Measure Evaluation n.d.). It is more time efficient and less expensive than traditional surveys as it allows for substantially smaller sample sizes (Measure Evaluation n.d.).

organisations in strengthening oversight practices. For instance, Van Wicklin and Gurkan (2013: 5) describe how ministries participating in a TPM programme in Afghanistan sought to work closely with the contracted international NGO to better understand the monitoring findings and use them to improve programme implementation.

Types of TPM and actors involved

TPM encompasses a range of organisational arrangements and data collection approaches that vary according to monitoring objectives, operating environment and the nature of the intervention. In practice, most TPM programmes combine several complementary methods to generate evidence and triangulate findings.

At the broadest level, TPM relies on both quantitative and qualitative methods.³ Quantitative approaches are typically used to verify outputs, measure service delivery or beneficiary satisfaction, and assess programme performance against predefined indicators (Harrison 2020; Jackson and Majid 2024). They commonly include structured household or beneficiary surveys, facility assessments and expenditure tracking. Qualitative approaches seek to understand implementation processes, beneficiary experiences and contextual factors that cannot easily be captured through numerical indicators. These include key informant interviews, focus group discussions, community consultations and direct observation (Jackson and Majid 2024; Harrison 2020).

A further distinction concerns what is being monitored. Harrison (2020: 19-20) differentiates between TPM focusing on people and TPM focusing on assets. People-centred monitoring examines whether services reach intended beneficiaries, how projects are implemented and how beneficiaries and other stakeholders perceive programme performance. Information is collected from direct and indirect beneficiaries, implementing partner staff, community leaders and other local stakeholders through qualitative and quantitative research (Harrison 2020). Asset monitoring, by contrast, focuses on verifying the existence, condition or distribution of physical goods and infrastructure. It is particularly useful in FCAS where donors cannot directly verify the delivery of medium-value non-food items or inspect high-value infrastructure investments (Harrison 2020: 20).

There are two key contracting models of TPM:

³ For an overview of benefits and challenges of different methodological approaches, see Figure A1 in the Annex.

- The ‘international’ model where donors commission a reputable TPM agency typically based in Brussels, London or Washington,⁴ which then turns to one or more local data collection firms to visit the donor’s implementing partners
- The ‘local’ alternative model, where a lead TPM agency is cut out and donors work directly with local data collection firms; this model has benefits in terms of saving costs and creating a closer bond between donors and those in the field but also creates a risk since local firms may lack sufficient skills and capacity to do the work to the standards required (Harrison 2020: 20-21)

TPM providers themselves may include NGOs, civil society organisations (CSOs), private consulting firms, research institutes, universities and, in some cases, media organisations (Van Wicklin and Gurkan 2013). Regardless of organisational form, TPM providers increasingly rely on locally recruited monitors who possess the contextual knowledge, language skills and access needed to operate safely in insecure environments (Abdalla and ElSayed 2021).

In practice, TPM employs a wide range of monitoring techniques, many of which overlap with conventional monitoring and evaluation. Frequently used qualitative methods include key informant interviews, focus group discussions, community meetings and beneficiary consultations. Quantitative approaches include beneficiary surveys, citizen report cards, expenditure and procurement tracking, facility assessments and structured spot checks. Documentary review of implementing partners’ reports and administrative records is also commonly used to triangulate evidence (Van Wicklin and Gurkan 2013; Jackson and Majid 2024).

Technology has become an increasingly important component of TPM, particularly where physical access is limited. Common approaches include GPS-enabled data collection and geo-tagging, mobile survey applications, SMS-based beneficiary feedback, web-based reporting platforms, call centres for complaints and feedback, aerial imagery and satellite photography for infrastructure verification, and digital tracking of field activities (Integrity Research and Consultancy 2015: 71-76;⁵ World Bank 2018).

TPM implemented in the health sector illustrates how multiple techniques are often combined within a single monitoring framework. Examples from Afghanistan, South Sudan and Yemen include health facility functionality platforms, data verification

⁴ Reflecting an increased professionalisation of TPM and dominance of Global North based private companies (Diepeveen et al. 2022, 2025).

⁵ For a full description, including benefits and disadvantages, see: Integrity Research and Consultancy (2015: 71-76).

visits, quality-of-care assessments, LQAS, beneficiary satisfaction surveys and supervisory visits (Abdalla and ElSayed 2021).

The selection of TPM methods ultimately depends on the operating context and monitoring objectives. Cliffe et al. (2023) argue that oversight mechanisms should reflect the political environment and degree of donor access. In highly politically estranged settings, monitoring via international third-party monitors has become the default monitoring mechanism, whereas in contexts with lower political risks and greater government willingness to accommodate donor oversight, community based monitoring and local civil society organisations may provide sufficient accountability. Similarly, the European Court of Auditors (2025: 47), in an audit of the European Commission's remote management approach⁶ in the humanitarian aid sector from 2019 to 2023 focusing on Somalia, Syria and Ukraine, found that humanitarian partners operating under remote management used beneficiary surveys, real-time monitoring of aid distribution, market inspections to detect the resale of distributed goods, key informant interviews, focus group discussions, asset inspections and financial verification.

Together, these examples illustrate that effective TPM rarely relies on a single method but instead combines complementary techniques tailored to local risks, access constraints and programme characteristics.

⁶ Remote management or remote programming and TPM are related but distinct concepts. Remote management is an operational modality adopted when insecurity or access constraints require organisations to relocate staff and delegate greater responsibility for programme implementation to local staff or partners (Integrity Research and Consultancy 2015). TPM, by contrast, is an independent oversight mechanism conducted by external actors (Integrity Research and Consultancy 2015). While TPM is frequently used to monitor programmes implemented under remote management, it can also be employed in other contexts, and remote management does not necessarily require TPM (Integrity Research and Consultancy 2015).

Anti-corruption potential of TPM

General advantages of TPM

The literature identifies several advantages of TPM that are particularly relevant in FCAS. While TPM is primarily introduced to overcome access constraints, its benefits extend beyond enabling remote oversight. Independent monitoring can strengthen the quality and credibility of monitoring information, improve accountability, support adaptive programme management and reduce fiduciary risks by providing an additional layer of verification between donors and implementing partners.

One of TPM's principal contributions is improving the reliability and credibility of monitoring information. Because third-party monitors operate independently of donors and implementing organisations, they can verify reported results, triangulate evidence from multiple sources and identify inconsistencies or weaknesses in routine reporting. This helps reduce information asymmetries between donors and implementing partners while increasing confidence in reported project performance (Sagmeister and Steets 2016). In addition, locally based TPM providers can often collect monitoring data more frequently and at a lower cost than international organisations, particularly where projects are geographically dispersed or located outside donors' regular areas of operation (Sagmeister and Steets 2016).

Independent monitoring can also strengthen accountability and transparency. Evidence from the World Bank's External Implementation Status Reports Plus (EISR+) initiative, which engaged CSOs in monitoring World Bank financed projects in countries including Ghana, Nigeria and Zambia, contributed to greater transparency and accountability of the bank's funded projects, strengthened the monitoring capacity of participating CSOs and improved trust between governments and civil society⁷ (Van Wicklin and Gurkan 2013: 3).

Research on health sector TPM in South Sudan likewise highlights a range of operational and governance benefits. Based on interviews with government officials, UN agencies, NGOs and donors, Abdalla and ElSayed (2021) conclude that TPM strengthened monitoring and evaluation systems, identified weaknesses in data

⁷ This assessment refers to non-state monitoring, which includes both participatory monitoring, referring to the "active participation of project beneficiaries, project affected people, communities, and other primary stakeholders in designing and implementing the monitoring" and TPM (Van Wicklin and Gurkan 2013: 2-4).

quality, supported the verification of health facility reporting, improved measurement of programme effectiveness and contributed to reducing waste, fraud and corruption. In the South Sudan context, third-party monitors proved particularly valuable in assessing health facilities located in hard-to-reach areas and independently verifying service delivery data that could not otherwise be reliably collected (Abdalla and ElSayed 2021).

Box 1. International Committee of the Red Cross (ICRC) experience with TPM in Somalia

In Somalia, ICRC relied on locally contracted independent consultants as third-party monitors to ensure that the project was implemented according to guidelines. Specifically, third-party monitors were tasked with providing an independent overview of the project, visiting places that are not accessible to ICRC staff, verifying that project activities are adequately implemented and conducting follow-up visits, among other tasks (ICRC 2020).

According to ICRC (2020: 6), these services were a key step towards implementing accountability measures and ensuring that ICRC's operations align with its rules, regulations and principles.

These findings suggest that TPM creates value not only by extending monitoring into inaccessible environments but also by improving the credibility, frequency and quality of monitoring information. These advantages are particularly important in FCAS, where limited access, weak oversight institutions and information asymmetries increase both implementation risks and opportunities for corruption.

TPM uses in anti-corruption

Beyond strengthening general accountability and oversight, TPM can contribute directly to anti-corruption efforts by detecting irregularities that would otherwise remain unnoticed in inaccessible environments. The literature suggests that independent monitoring can identify a broad range of corruption related risks, including aid diversion, fraud, ghost beneficiaries, elite capture, manipulation of beneficiary selection, misuse of programme resources and weak financial controls. Importantly, TPM not only documents such risks but can also provide evidence that supports corrective action by governments and donors.

One of the notable examples comes from Nigeria, where third-party monitoring of three components⁸ of the government's national social investment programmes uncovered numerous governance weaknesses and corruption risks (ActionAid Nigeria 2019). Across the monitored programmes, TPM identified implementation failures, leakages, opportunities for political capture, fraud and misuse of programme resources.

Within the government enterprise empowerment programme, TPM led to the documentation of several forms of abuse affecting the loan allocation process. Politicians reportedly established fake cooperatives or mobilised community members to apply for loans before requiring beneficiaries to surrender part of the proceeds. In many cases, recipients were reportedly unaware that the funds constituted loans (ActionAid Nigeria 2019: 11). Third-party monitors also identified manipulation of loan applications, resulting in reduced access to legitimate beneficiaries (ActionAid Nigeria 2019: 11). Additionally, beneficiaries reported inadequate information about loan conditions, delayed disbursement, unexplained underpayments and inconsistent loan amounts, all of which created opportunities for arbitrary decision-making (ActionAid Nigeria 2019: 11).

In the home-grown school feeding programme, TPM documented complaints about insufficient food portions and poor quality meals, including protein quantities below programme standards (ActionAid Nigeria 2019). The government subsequently warned suppliers and threatened removal from the programme (Olaore 2022: 15).

TPM also detected weaknesses in the job creation programme. Independent monitors identified absentee or "ghost" beneficiaries who continued receiving monthly stipends despite being absent from their assigned schools or workplaces (ActionAid Nigeria 2019). Beneficiaries further reported delayed or unpaid stipends and inconsistent payments, highlighting weaknesses in programme administration and payment controls (ActionAid Nigeria 2019). In response, the government introduced attendance monitoring mechanisms and suspended payments following repeated absences (Olaore 2022: 15).

Importantly, TPM findings contributed to concrete remedial action in several instances. One notable example concerned the payment mechanisms for cooks participating in the school feeding programme. The programme was designed so that funds would be transferred directly to cooks responsible for purchasing food and preparing meals. TPM revealed, however, that intermediaries had infiltrated the

⁸ Which included "Home-Grown School Feeding Programme (HGSFP), Job Creation Programme (N-Power), and the Government Enterprise Empowerment Programme (GEEP), across all the States of the Federation and the Federal Capital Territory, FCT (excluding Ekiti State), for the period May to November 2018" (ActionAid Nigeria 2019: preface).

application process by submitting applications on behalf of prospective cooks using bank accounts under their own control (Olaore 2022: 15). Once cooks were recruited, these intermediaries reportedly diverted part of the transferred funds, in some cases with the tacit involvement of bank officials (Olaore 2022: 15). Following these findings, the government required all participating cooks to open bank accounts in their own names and arrested some of those involved in the scheme (Olaore 2022: 15). TPM also raised concerns that many recruited cooks were affiliated with political parties, suggesting potential political influence over programme implementation (ActionAid Nigeria 2019: 39).

The Nigerian experience also illustrates that TPM effectiveness depends on the availability of information and adequate resources. Third-party monitors reported difficulties obtaining access to beneficiary lists, limiting their ability to verify programme implementation independently (ActionAid Nigeria 2019). They also highlighted poor public awareness of programme rules, which created opportunities for intermediaries and political brokers to exploit applicants, as well as insufficient funding for monitoring, which reduced geographical coverage and increased the likelihood that implementation problems would remain undetected (ActionAid Nigeria 2019).

Evidence from Somalia similarly demonstrates TPM's ability to detect anomalies that may indicate aid diversion or favouritism. In one cash-based assistance programme in Lower Shabelle, third-party monitors found that approximately 40% of beneficiaries registered as residents of the area were simultaneously receiving assistance in another region, suggesting significant weaknesses in beneficiary targeting and verification (Majid and Harmer 2016: 21). Monitoring also revealed that staffing within the implementing NGO was reportedly dominated by members of a single clan, dominant in the Mogadishu region, raising concerns that assistance was being redirected towards areas where that clan was the most prevalent (Majid and Harmer 2016: 21). In another Somali case, third-party monitors questioned the credibility of beneficiary records after discovering that a village expected to contain 400 beneficiary households consisted of only around 20 dwellings. Despite documenting that only a handful of individuals appeared during verification visits, monitors reported pressure from some NGOs to produce more favourable assessments, illustrating that TPM can identify irregularities but does not necessarily guarantee that corrective action will follow (Majid and Harmer 2016: 25).

Challenges of TPM

General challenges

Although TPM can strengthen oversight and accountability, it also faces a range of operational, institutional and political challenges that may limit its effectiveness. Many of these challenges are not unique to TPM but are common to monitoring in FCAS more broadly. Others arise specifically because TPM introduces additional actors into already complex accountability relationships.

A first set of challenges relates to operational constraints affecting data collection and quality. Even locally based third-party monitors may face severe access restrictions, limiting their ability to verify project implementation or collect representative data (Van Wicklin and Gurkan 2013). In some cases, deteriorating security conditions require monitoring approaches to be redesigned altogether. For example, during the inception phase of the FCDO's Monitoring, Evaluation, Research and Learning for Yemen (MERLY) programme, the lead contractor concluded that in-person data collection would not be feasible in northern Yemen because of security concerns. To avoid major implementation delays, FCDO relied on a previously contracted local provider that was subsequently subcontracted by the lead contractor, illustrating the need for continuous reassessment of access constraints and flexible monitoring arrangements (FCDO 2025).

Beyond physical access, TPM faces many of the methodological challenges common to standard monitoring ones. These include difficulties in obtaining reliable and representative data, small or biased samples, reporting delays and inconsistent data verification practices (Van Wicklin and Gurkan 2013: 6; OIAI 2019). For example, research on health sector TPM in South Sudan identified delays in reporting, limited interaction between third-party monitors and implementing partners, weaknesses in sampling methodologies for facility visits and surveys, and the absence of harmonised verification approaches among development partners, all of which affected the quality and usability of the monitoring findings (Abdalla and ElSayed 2021). Resource constraints may further reduce the representativeness of monitoring. In Nigeria, for instance, only one CSO was assigned to each state to monitor the national social investment programmes, requiring monitors to limit geographical coverage and restricting findings to locations that could realistically be visited (ActionAid Nigeria 2019).

A second challenge concerns cooperation and information sharing. Effective TPM depends on timely access to programme information, yet implementing partners may be reluctant to share sensitive data (e.g. beneficiary lists or facility locations) with

external monitors. Such reluctance can delay monitoring activities and undermine sampling strategies. During the MERLY inception phase, for example, implementing partners were initially unwilling to share beneficiary data with the TPM consortium. Only after negotiating data sharing agreements and confidence building measures did monitors obtain most of the information required for effective monitoring (FCDO 2025).

A third challenge is ensuring that TPM findings actually lead to corrective action, considering that donors and project staff may be reluctant to act on the findings of TPM, especially in the absence of clear procedures for addressing recommendations of such monitoring (see Box 2). Concerns about the quality or contextual understanding of TPM findings may discourage programme staff from acting upon recommendations, while organisations often lack formal procedures for tracking the implementation of corrective measures (Van Wicklin and Gurkan 2013). At the same time, some audits have found that TPM reports may occasionally contain inaccuracies or fail to fully reflect local realities, highlighting the importance of quality assurance and appropriate interpretation of monitoring findings (OIAI 2019: 18).

Box 2. Acting on TPM findings requires clear follow-up mechanisms

The experience of USAID/Somalia illustrates the importance of institutionalising follow-up procedures for TPM recommendations. An evaluation of USAID/Somalia's democracy, stabilisation and governance portfolio found that the mission lacked a standardised system for managing recommendations generated through TPM (Office of Inspector General 2025). In response, USAID and its TPM provider introduced recommendation trackers that recorded monitoring findings, assessed whether recommendations were actionable and established a target of addressing them within 90 days. The reform sought to respond to concerns among technical staff regarding both the quality of TPM recommendations and the absence of oversight over their implementation (Office of Inspector General 2025: 10).

However, the evaluation found that the new system remained only partially effective. Not all programmes were included in the tracking process, actionable recommendations often lacked concrete corrective actions or meaningful deadlines and decisions not to implement recommendations were frequently left unexplained. Of 35 recommendations recorded between February 2023 and May 2024, only four were considered actionable, yet none included documented follow-up actions or evidence that corrective measures had been completed, while there were no explanations as to why the remaining 31 did not need to be addressed (Office of Inspector General 2025: 10-11).

Similar weaknesses were identified in UNICEF's use of TPM in Yemen. Although TPM reports were intended to inform field offices and implementing partners, monitors submitted reports to the planning, monitoring and evaluation section in Sana without copying concerned field offices. As a result, reports often reached operational staff only after significant delays or upon request, limiting their usefulness for timely decision-making. According to the audit, this created situations in which implementing partners whose financial controls had been assessed as weak could continue receiving funding before identified problems had been addressed (OIAI 2019: 18).

The increasing reliance on TPM also raises important data governance and accountability challenges. Diepeveen et al. (2022), focusing on Somalia's experience with TPM, identify several challenges:⁹

- Fragmented responsibility and weak accountability: TPM involves multiple actors (e.g. donors, implementing agencies, international TPM firms, local subcontractors, enumerators), creating unclear responsibility for data management, oversight and risk mitigation; no single actor has full visibility over the monitoring chain.
- Limited contextual knowledge: international TPM providers often lack deep understanding of local political, social and conflict dynamics because they frequently rely on remote management and subcontracted local partners, which can reduce the accuracy of findings and lead to the misinterpretation of programme performance.
- Displacement rather than elimination of security risks: TPM is frequently justified because donor or agency staff cannot safely access project sites; however, this shifts security risks onto local enumerators¹⁰ and subcontracted monitors, who often operate under insecure conditions with limited institutional protection; additionally, data sharing risks are unevenly distributed as they mostly include reputational risks for agencies but significant security and personal identification risks for data enumerators and beneficiaries (Diepeveen et al. 2022: 36).
- Trust deficits between stakeholders: although donors often place high trust in TPM providers, implementing organisations may view TPM as an instrument of donor surveillance rather than learning; this mistrust can discourage cooperation and reduce willingness to share data. Where monitoring methods fail to account for local perceptions, they may unintentionally undermine that trust. Howe et al. (2015: 37), for example,

⁹ For the full description of data related challenges, see: Diepeveen et al. (2022).

¹⁰ Staff employed by TPM providers to collect data from end users (Diepeveen et al. 2022: 23).

describe a case in Syria where beneficiaries contacted by telephone to verify receipt of food assistance believed they were being monitored by security actors and subsequently refused further assistance.

- Data protection and privacy risks: because TPM requires extensive sharing of beneficiary information across multiple organisations, each transfer increases the risk of data breaches, re-identification of beneficiaries and misuse of sensitive information.
- Heavy burden on beneficiaries: repeated surveys by different monitoring actors can create respondent fatigue, while affected populations often see little evidence that the information they provide leads to tangible programme improvements.

More broadly, Diepeveen et al. (2025) argue that the growing involvement of external monitoring firms may reshape accountability relationships in ways that reinforce existing global power asymmetries. Treating monitoring data primarily as a technical product can obscure the experiences of aid recipients and reduce opportunities for meaningful engagement with local actors, thereby weakening rather than strengthening accountability.

Additional challenges include a loss of institutional memory and internal monitoring capacity when TPM is used as a substitute for an organisation's own monitoring, poor selection of TPM providers affecting the reputation of donors and implementing partners and a lack of adequate training provided for third-party monitors can result in poor quality of information received (ICRC 2020: 9; OIAI 2019).

Corruption and governance risks

Although TPM is commonly promoted as a mechanism for strengthening accountability and reducing corruption risks, it can also create new governance vulnerabilities of its own. By introducing additional actors into aid delivery chains, TPM generates new opportunities for bribery, collusion, conflicts of interest and manipulation of monitoring information. Rather than operating outside local political economies, third-party monitors frequently become embedded within existing networks of power, patronage and corruption that characterise many FCAS (Lanfranchi and Stuttaford 2024: 7).

Bribery, collusion and falsification of monitoring reports

Evidence from Somalia suggests that bribery and collusion can occur at multiple stages of the monitoring process. One risk is that implementing organisations may

seek to influence monitoring findings by offering payments or other benefits to third-party monitors in exchange for favourable assessments of projects that have been poorly implemented or not implemented at all. Drawing on evidence from South Somalia,¹¹ Majid and Harmer (2016: 24–25) report that both international and national consultants frequently faced pressure to produce reports that portrayed programmes more positively than their findings justified. In some cases, humanitarian organisations reportedly offered payments to monitors despite the absence of project activities on the ground. Conversely, monitors themselves may engage in extortion by demanding cash payments or other favours in return for writing positive assessments or suppressing negative findings (Majid and Harmer 2016: 25). The authors also discuss collusive arrangements that may emerge where agencies and monitors pre-arrange favourable evaluations, with the monitoring contract functioning as a form of payment or reward (Majid and Harmer 2016: 25).

These risks may be reinforced where third-party monitoring providers develop close or long-standing relationships with implementing organisations. In Somalia, some organisations reportedly maintained particularly close links with TPM firms, undermining the independence of the monitoring process (Majid and Harmer 2016: 25). Similarly, organisations using TPM in Syria and Somalia observed that repeated visits to the same project locations or repeated contracts with the same donors could gradually compromise monitors' neutrality and independence (Chaudhri et al. 2019).

Another study tells of an aid worker asking how to ensure that their staff is not bribing the TPM organisation to write a positive report, suggesting that they would rather rely on an implementing partner they know, rather than on a TPM organisation they do not, raising the issue of trust (van Beijnum et al. 2018: 23; Howe et al 2015: 36). This suggests that assessing conflicts of interest is particularly difficult in contexts characterised by entrenched patronage systems and networks shaped by group identities, where donors often have limited visibility over local relationships that may influence monitoring outcomes (van Beijnum et al. 2018; Building Markets and Orange Door Research 2018: 14).

Evidence from Afghanistan demonstrates that corruption risks may also arise through the manipulation or fabrication of monitoring data, particularly where TPM findings become directly linked to financial incentives. Alba et al. (2023), based on the analysis of perceptions of selected stakeholders¹² involved in the TPM of two

¹¹ The research resulted in a case study of South Somalia, as part of the Collective Resolution to Enhance Accountability and Transparency in Emergencies (CREATE) initiative, led by Transparency International (Majid and Harmer 2016).

¹² The focus was on three stakeholders: the Ministry of Public Health (MoPH) as contractor of health service providers, the NGOs contracted to deliver BPHS/EPHS and the TPM agency, tasked with collecting and analysing data for monitoring the implementation and reporting to MoPH (Alba et al. 2023: 2).

programmes that implemented the basic package of health services (BPHS) and the essential package of hospital services (EPHS) in Afghanistan between 2013 and 2021,¹³ report several accusations of data fabrication, corruption and undue influence related to the TPM implementation.¹⁴ They argue that TPM changed fundamentally once it evolved from a mechanism for informing health service delivery into a tool underpinning a pay-for-performance system, under which service providers were rewarded according to reported service volumes (Alba et al. 2023). This altered incentive structure reportedly increased opportunities for data manipulation and collusion, particularly following the greater involvement of national NGOs in service delivery. In response, additional verification mechanisms were introduced to reduce the risk of collusion between service providers, the Ministry of Public Health (MoPH) and TPM providers (Alba et al. 2023: 4).

Both service providers and MoPH expressed concerns over data fabrication by TPM staff, especially when they were unable or unwilling to travel to parts of the country due to security issues or geographical accessibility. Although TPM providers maintained that allegations were investigated through internal quality assurance procedures, they acknowledged the risk that experienced data collectors could become adept at circumventing monitoring procedures and “professionalising” shortcuts (Alba et al. 2023: 5). Respondents further described complex informal networks involving armed groups, Taliban representatives, some service providers, certain TPM data collectors and officials within the MoPH. According to these accounts, some data collectors exaggerated security risks to justify remote reporting, some service providers allegedly offered direct or indirect payments in exchange for favourable assessments and some ministry officials reportedly pressured TPM providers to adjust performance scores (Alba et al. 2023: 5). While these findings reflect stakeholder perceptions and allegations rather than independently verified cases of corruption, they illustrate how incentive structures surrounding TPM can create opportunities for collusion and manipulation.

More broadly, Jackson and Majid (2024), drawing on evidence from Somalia and Afghanistan, identify TPM itself as one potential entry point for corruption and aid

¹³ As Alba et al. (2023: 2) note, until 2013, the main instrument for TPM monitoring the contracting of the BPHS/EPHS was a nationwide health facility survey, summarised in a balanced scorecard index for every province. Starting from 2013, during the SEHAT project, a new tool was added, the health management information system (HMIS) verification and health facility functionality assessments, and a portion of the payments to NGOs acting as service providers became tied to the results of the bi-annual HMIS verification scores. From 2018, with the Sehatmandi programme, a new pay-for-performance model was introduced and payments became much more dependent on the volume of service delivery, and the frequency of reports increased from bi-annual to quarterly. In addition, TPM included several other assessments, such as the drug quality assessment and nationwide household survey, although these did not affect the payment (Alba et al. 2023: 2).

¹⁴ The study also identifies positive effects (not anti-corruption specific) of TPM. See: Alba et al. (2023: 3-4).

diversion, despite its widespread use as an anti-corruption mechanism. They argue that collusion between implementing organisations and TPM staff is not uncommon, particularly where monitors lack experience in resisting external pressure and where integrity screening receives insufficient attention during recruitment and human resource management (Jackson and Majid 2024: 21). They also cite examples from Yemen where third-party monitors reportedly depended on maintaining good relations with local authorities to continue operating, creating additional opportunities for coercion and bias in monitoring reports (Jackson and Majid 2024: 23; Vuylsteke 2021).

Drivers of corruption and governance risks

While documented cases of corruption involving TPM remain relatively limited, the literature identifies a number of structural factors that increase the likelihood of corruption and governance failures within monitoring arrangements. These drivers tend to interact with the political economy of FCAS, organisational incentive structures and weaknesses in TPM design and oversight. Understanding these underlying drivers is therefore essential for understanding corruption risks that TPM brings and for designing monitoring systems that are both effective and resistant to corruption.

Dependence on local intermediaries and patronage networks

Deeply entrenched patronage systems and informal power networks in FCAS constitute one of the most significant structural drivers of corruption risks in TPM. Because international organisations often cannot directly access project sites, they rely heavily on local firms, subcontractors and individual monitors whose ability to operate frequently depends on relationships with local political, clan or community leaders. Rather than remaining external to these political economies, TPM providers may therefore become embedded within them.

Evidence from Somalia illustrates the scale of this challenge. Studies have documented the extensive patronage networks involved in humanitarian assistance that link aid agencies, implementing NGOs, local authorities, clan structures and other intermediaries involved in aid diversion (Abdirahman 2015; Majid and Adan 2024; Jackson and Majid 2024; Bergin 2026). Similar patterns of politicised resource allocation have been documented in other conflict-affected settings, including Syria and Afghanistan (Dihmis 2021; Resimić 2024; Hamadeh 2026; Abdulghany 2026; Reuters 2025).

These dynamics also affect the independence of TPM providers. For example, the European Court of Auditors (2025: 47) noted that some monitoring firms operating

in Somalia relied on staff from particular clans to gain access to specific territories. While often operationally necessary, such arrangements may expose monitoring to undue influence and increase the risk of biased reporting.

Reflecting these concerns, an evaluation of the UK's Department of International Development's (DFID)¹⁵ use of remote monitoring tools including TPM¹⁶ concluded that TPM has important limitations as a tool for addressing fiduciary risks. Some interviewed monitors demonstrated limited willingness and, in some cases, limited capacity, to investigate fraud and corruption because doing so risked antagonising powerful local actors. The evaluation therefore cautioned that where fiduciary risks constitute the primary concern, TPM alone may not provide sufficient safeguards (Integrity Research and Consultancy 2015: 29–30).

Incentives for positive reporting by TPM providers and implementing partners

A second driver arises from the incentive structures facing implementing organisations and TPM providers. Implementing partners may perceive independent monitoring primarily as a donor accountability mechanism rather than an opportunity for organisational learning. Consequently, they may fear that unfavourable monitoring findings could jeopardise future funding or increase donor oversight. Reflecting this concern, an evaluation of DFID's use of remote monitoring, including TPM, found that many implementing partners viewed TPM as a form of donor micromanagement rather than collaborative monitoring, while others feared that the findings may lead to funding cuts (Integrity Research and Consultancy 2015: vii).

TPM providers may simultaneously face incentives that favour positive reporting. As the TPM market has expanded into a competitive commercial sector, monitoring firms increasingly depend on securing repeat contracts from donors and implementing organisations. This commercial dependence may discourage highly critical reporting where monitors fear damaging future business relationships (Majid and Harmer 2016: 24).

These incentives may be reinforced by weak professional standards and limited external oversight. In fragile settings, TPM organisations often operate without

¹⁵ DFID ceased to exist as a separate department in 2020 as “in September 2020, DFID and Foreign and Commonwealth Office (FCO) were merged to create a new department called Foreign, Commonwealth & Development Office (FCDO), whose stated aim was to unite development and diplomacy into one new department” (NAO 2024; Resimić 2025: 7).

¹⁶ The study included semi-structured interviews with 144 people, including thirteen TPM staff in Kenya (Nairobi) and Somalia, along with desk-based review, focus group discussions and observations (e.g. of two verification visits) (Integrity Research and Consultancy 2015).

established accreditation systems or common professional standards, while some organisations replicate the same governance weaknesses they are expected to monitor, including inadequate human resource practices, weak internal controls and tolerance of collusive behaviour. For example, early TPM providers in Somalia reportedly recruited staff with limited contextual knowledge and only gradually developed stronger local expertise (Majid and Harmer 2016: 24).

Conflicts of interest

Another important driver of corruption in TPM is related to conflicts of interest. While contractual arrangements may formally establish TPM providers as independent actors, financial and operational dependence on the contracting party can undermine both actual and perceived impartiality.

The OIAI (2019) audit of UNICEF's Yemen country office found that only two institutional contractors were responsible for a wide range of outsourced services, including TPM, call centre operations, field consultants and case management assistants. Although using the same contractors for multiple functions may improve efficiency, relying on the same personnel to conduct spot checks, site visits and audits can compromise the objectivity of these activities and increase the risk of conflicts of interest (OIAI 2019: 19).

The World Bank's (2018) good practice note on TPM similarly emphasises that third-party monitors should be independent from project preparation and should not have previously participated in project implementation. Their independence should be periodically reviewed to identify and manage potential conflicts of interest (World Bank 2018). This recommendation reflects a broader challenge within TPM: monitors are rarely fully independent because they are selected, managed and paid by one of the parties involved in project implementation. Consequently, robust safeguards to prevent and manage conflicts of interest are essential if TPM findings are to remain credible to donors, governments and other stakeholders (World Bank 2018).

Evidence from Afghanistan further illustrates how conflicts of interest may arise in practice. Based on a review of literature and a short survey of UN agencies working in Afghanistan on the use of TPM, circulated by the risk management unit in 2014, several examples of conflicts of interest were identified, including a monitoring company led by an individual who simultaneously served as a government minister whose official portfolio overlapped with the consultancy's activities. In another case, a company contracted to implement a programme was subsequently appointed as the third-party monitor responsible for overseeing that same programme (UN 2015: 24-25).

Poor selection and weak oversight of TPM providers

The selection of suitable third-party monitoring providers is itself a critical governance issue. In many FCAS, the market of organisations capable of conducting TPM is small, limiting competition and making it difficult to identify providers that combine technical expertise, contextual knowledge and independence. Consequently, careful market analysis, robust procurement procedures and continuous performance oversight are essential to minimise corruption risks and safeguard the credibility of monitoring (Van Wicklin and Gurkan 2013: 10).

The experience of the Afghanistan Reconstruction Trust Fund (ARTF) illustrates the importance of the careful selection of providers. Recognising both the widespread corruption risks in Afghanistan and the need for reliable monitoring of village level infrastructure projects in hard-to-access areas, the World Bank developed a detailed request for proposals to identify the most suitable TPM provider (Van Wicklin and Gurkan 2013: 11; World Bank 2018: 19). The procurement process explicitly acknowledged the trade-offs between different types of providers: while international organisations often possess stronger technical expertise and management capacity, they may lack an in-depth understanding of the local context; conversely, local organisations generally have stronger contextual knowledge but may face capacity constraints and be more vulnerable to political influence. Ultimately, the bank selected the international NGO International Relief and Development (IRD), which combined international expertise with extensive operational experience and established local networks in Afghanistan (Van Wicklin and Gurkan 2013: 11).

The appropriate choice of TPM provider is also highly context dependent. Van Wicklin and Gurkan (2013: 16) illustrate this through the example of Burkina Faso. Although the country has a vibrant civil society, many organisations are vulnerable to politicisation, while research institutes and advocacy oriented thinktanks supported by donors have limited influence outside major urban centres. Limited access to funding further intensifies competition among civil society organisations, potentially reducing effectiveness and increasing vulnerability to corruption. Recognising these contextual differences, the World Bank adopted different monitoring arrangements across sectors: a private firm was selected for agriculture and transport projects, whereas an umbrella civil society organisation with recognised sectoral expertise was engaged for monitoring in the water sector (Van Wicklin and Gurkan 2013: 16).

The experience of the World Bank's TPM arrangements in Yemen similarly demonstrates the consequences of weak provider selection and oversight. As discussed earlier, the project experienced reporting delays and weaknesses in monitoring quality that were attributed, at least in part, to the absence of a direct contractual relationship between the World Bank and the TPM providers, the

restrictive operating environment in northern Yemen and the limited availability of qualified monitoring firms (Cliffe et al. 2023: 64; World Bank 2022: 15).

Weak procurement processes can themselves become drivers of governance and corruption risks. An audit of the UN Office for the Coordination of Humanitarian Affairs (OCHA) in Yemen by the Office of Internal Oversight Services (OIOS) found significant shortcomings in the procurement of TPM services (OIOS 2019). The selected contractor submitted a bid that was substantially below both the original budget and the average value of other qualifying bids, raising concerns that the company had underestimated the complexity and scope of the assignment (OIOS 2019). According to OCHA staff, one of the principal causes of these problems was that the procurement process had been rushed, leaving insufficient time to develop robust terms of reference (OIOS 2019: 6). As a result, the selected provider struggled to fulfil its contractual obligations because it was not properly registered in Yemen and encountered difficulties accessing project sites, ultimately requiring subcontracting arrangements with two additional TPM providers (OIOS 2019: 6). The audit consequently recommended that OCHA strengthen its assessment and ongoing evaluation of TPM provider performance (OIOS 2019).

Good practices and emerging opportunities

General recommendations

The literature identifies a number of good practices and emerging opportunities that can strengthen the effectiveness of TPM. While these recommendations are generally intended to improve monitoring quality and programme performance, they also have important implications for corruption prevention. As discussed in the previous section, weaknesses in TPM design, procurement and implementation can create governance vulnerabilities and incentives for corrupt behaviour. Strengthening these foundational aspects is therefore an important step towards reducing corruption risks associated with TPM. The following subsection discusses these general good practices, while the subsequent subsection focuses on recommendations that explicitly target corruption and integrity risks.

Adequate planning and addressing security risks faced by TPM providers

As discussed in the previous section, access constraints and security risks not only limit monitoring but may also create incentives for monitors to avoid difficult locations or substitute direct observation with incomplete or fabricated reporting. Consequently, careful planning and proactive management of security risks constitute important safeguards for both monitoring quality and integrity.

The experience of the FCDO's Monitoring, Evaluation, Research and Learning for Yemen (MERLY) programme demonstrates the importance of regularly reassessing access constraints and security conditions to adapt monitoring arrangements and avoid implementation delays (FCDO 2025). Similarly, the ICRC (2020) emphasises that organisations should explicitly incorporate the safety and security of third-party monitors into TPM design, recognising that TPM frequently transfers rather than eliminates security risks. Failure to adequately protect monitors may discourage them from accessing high-risk areas and inadvertently create incentives to falsify monitoring data to fulfil contractual obligations (ICRC 2020).

Planning should also recognise that TPM projects rarely proceed exactly as initially designed. Harrison (2020: 28) therefore recommends preparing key operational documentation before field deployment, including monitoring methodologies, field manuals, health and safety protocols, security procedures and training plans for

monitors. Likewise, Sagmeister and Steets (2016: 21) caution against overly ambitious monitoring frameworks and instead recommend focusing on priority indicators or geographical areas where reliable monitoring can realistically be achieved.

Careful selection of TPM providers

The previous section identified weak provider selection, conflicts of interest and limited market capacity as important drivers of corruption and governance risks. Accordingly, the literature consistently emphasises that selecting an appropriate TPM provider is one of the most important decisions in designing a credible monitoring system.

Robust due diligence should extend beyond technical competence to include beneficial ownership, previous implementation roles, organisational independence and potential conflicts of interest (UN 2015; ICRC 2020). Such scrutiny is particularly important because TPM relies heavily on the integrity and competence of field staff while operating in environments where opportunities for political influence and collusion are significant. Moreover, some evidence suggests that monitoring firms have sought to reduce operational costs by lowering remuneration and qualification requirements for field teams, potentially compromising monitoring quality and increasing governance risks (Henze et al. 2020: 30–31).

Drawing on operational experience, ICRC (2020: 12) identifies several desirable characteristics of TPM providers:

- significant experience in conducting TPM in the relevant context and extensive field presence
- physical access to monitoring locations
- extensive contextual knowledge
- a strong reputation and relationships with the community, beneficiaries and other relevant stakeholders in the region¹⁷
- adequate risk management policies (e.g. for data sharing)
- experience using digital technologies for data collection and management

¹⁷ However, as Van Wicklin and Gurkan (2013) recognise, the relationship with the government, project, beneficiaries and communities should not be too close to jeopardise third-party monitor's impartiality or risk their co-optation.

Finally, procurement processes should explicitly assess conflicts of interest. Harrison (2020: 25) notes that some international firms simultaneously act as implementing partners and third-party monitors. Procurement procedures should therefore assess whether prospective providers undertake implementation activities that could compromise their independence, while terms of reference should explicitly require the disclosure and management of conflicts of interest (Harrison 2020: 25).

Training of TPM providers

Several of the governance challenges discussed earlier, including weak data quality, inconsistent monitoring practices and limited contextual understanding, stem from insufficient capacity among TPM providers and field enumerators. Therefore, strengthening technical and organisational capacity is recognised as a prerequisite for effective and credible monitoring.

Given the limited number of experienced TPM providers in many FCAS, organisations should assess capacity gaps among selected providers and provide targeted training where necessary (ICRC 2020: 12). Van Wicklin and Gurkan (2013: 16) note that expertise is frequently concentrated in capital cities, making additional capacity building necessary in areas such as donor procurement rules, financial management, indicator development, benchmarking, data collection methodologies, analysis and the practical use of monitoring findings.

Evidence from Afghanistan illustrates these challenges in practice. Within the health sector TPM programme, service providers expressed concerns regarding the training of field data collectors, while TPM organisations acknowledged that preparing large numbers of enumerators under demanding reporting schedules represented a significant operational challenge (Alba et al. 2023: 5).

Sagmeister and Steets (2016) therefore recommend substantial investment in training, particularly for field monitors who represent the essential part of TPM. They further suggest that commissioning agencies and TPM providers jointly recruit and train monitors, helping establish a shared understanding of monitoring methodologies while strengthening trust between commissioning organisations and monitoring providers (Sagmeister and Steets 2016: 20). Beyond initial training, regular communication should continue throughout implementation to address emerging challenges and maintain monitoring quality (Sagmeister and Steets 2016: 20).

Building trust is equally important in relationships with implementing partners. As discussed earlier, implementing organisations may perceive TPM primarily as an instrument of donor surveillance, making them reluctant to cooperate or share programme information (Sagmeister and Steets 2016: 20). Lanfranchi and Stuttaford (2024: 7) therefore argue that presenting TPM as a mechanism for organisational

learning and knowledge generation, rather than solely as a tool for validating partner reporting, may improve cooperation and trust.

Clear protocols and integration with existing monitoring frameworks

One recurring weakness identified throughout the literature is that TPM findings do not always translate into corrective action. Independent monitoring has limited value if recommendations are not systematically reviewed, prioritised and incorporated, if well grounded, into programme management. Effective TPM therefore requires clear governance arrangements that integrate independent monitoring within broader organisational monitoring and decision-making systems.

ICRC (2020: 12) recommends embedding TPM into both project design and organisations' internal monitoring frameworks to ensure that monitoring findings are routinely considered during programme implementation. As van Beijnum et al. (2018: 24) highlight, organisations should clearly define the respective roles of TPM providers and other monitoring actors, establish a clear purpose for monitoring activities and designate a decision-making body responsible for reviewing monitoring findings and determining appropriate follow-up actions.

Commissioning organisations should also invest in internal systems capable of processing and analysing the substantial volume of information generated through TPM. Without adequate analytical capacity, valuable monitoring evidence may remain underutilised despite considerable investments in data collection (Sagmeister and Steets 2016).

Transparent data collection and data sharing arrangements

The previous section highlighted fragmented data governance, unclear accountability for data handling and weak communication with affected populations as important governance challenges associated with TPM. The literature increasingly identifies transparent data management as an essential component of responsible monitoring.

Diepeveen et al. (2022: 36) argue that organisations should improve the transparency of how monitoring data are collected, stored, shared and managed across the various actors involved in TPM, including enumerators, local and international monitoring providers, implementing partners and donors. Greater transparency is particularly important given the growing disconnect between increasing attention to data protection and fragmented data management practices. The authors therefore argue that organisations should first understand the institutional incentives contributing to

fragmented data governance before attempting to address them (Diepeveen et al. 2022: 36).

They further emphasise that affected communities and field enumerators should be placed at the centre of data governance by ensuring that they understand why information is collected and how it will be used (Diepeveen et al. 2022: 36).

Organisations commissioning TPM should also assume greater responsibility for responsible data management by incorporating explicit data governance requirements into TPM contracts and requiring equivalent standards from subcontractors (Diepeveen et al. 2022: 37; Westphal and Meier 2020: 16).

Given the highly data intensive nature of many TPM activities, Diepeveen et al. (2022: 37) additionally recommend applying the principle of data minimisation by collecting only the information necessary to answer specific monitoring questions. This reduces privacy and security risks while helping strengthen trust among implementing partners, enumerators and aid recipients.

Finally, transparent data governance should also include mechanisms allowing implementing organisations to respond to monitoring findings. Experience from Syria showed that some local CSOs became frustrated because they had no opportunity to comment on TPM findings before they were shared with donors, which reportedly damaged relationships between donors, monitors and implementing partners (Building Markets and Orange Door Research 2018: 24). By contrast, the Afghanistan health sector TPM programme shared draft monitoring findings with service providers before finalisation, enabling justified factual corrections while preserving the independence of monitoring conclusions (Alba et al. 2023: 4).

Corruption control related recommendations

The TPM literature provides relatively limited guidance aimed explicitly at preventing corruption within monitoring arrangements. Nevertheless, several practices emerge from documented TPM experiences. These include using technology to strengthen verification, triangulating TPM findings with independent data sources, conducting independent back-checks and, where appropriate, rotating monitors to reduce the risk of entrenched relationships. Crucially, TPM should be embedded within wider accountability and anti-corruption systems rather than treated as a self-contained safeguard.

Enhanced monitoring oversight via technologies

As discussed in the previous section, insecurity and limited access may create opportunities for monitors to avoid remote locations, fabricate visits or submit

incomplete information. Appropriate technologies can strengthen oversight by generating evidence that fieldwork occurred and by enabling more timely quality assurance.

A review of ICRC's (2020: 10) TPM experience in Libya, Yemen, the Democratic Republic of the Congo (DRC) and Somalia complemented with evidence from other agencies suggests that GPS tracking of field monitors and the automated random recording of interviews can improve accountability and quality assurance. GPS data can help verify that monitors reached assigned locations, while recordings allow supervisors to identify misunderstandings in questions or responses and provide rapid feedback to monitoring teams (ICRC 2020: 10). These techniques require caution in conflict settings, however. Devices may expose monitors or respondents to suspicion and security risks, meaning that low-visibility equipment should be prioritised and its use discussed with field teams before deployment (Sagmeister and Steets 2016: 21).

Technological choices should also reflect the operating environment. Given unreliable electricity supplies and internet connectivity in many FCAS, potentially suitable tools include handheld devices that permit offline digital data collection, mobile phone based feedback systems, satellite remote sensing, delivery tracking technologies and radio based communication (van Beijnum et al. 2018: 24). These tools can enable near real-time reporting, more systematic tracking of indicators and the collection of different forms of evidence (van Beijnum et al. 2018: 24). Such benefits are not automatic: organisations should assess technological infrastructure and local contexts before selecting a tool, involve intended users in its design, obtain meaningful informed consent and invest in training and local acceptance (van Beijnum et al. 2018: 25).

The World Bank's TPM arrangements for the Afghanistan Reconstruction Trust Fund illustrate how digital tools can strengthen the audit trail (Van Wicklin and Gurkan 2013: 14; World Bank 2018: 19). Field engineers used customised smartphone applications to complete standardised inspection forms, record observations and take georeferenced photographs. Data were uploaded to a central processing system, checked for accuracy and completeness, and stored alongside inspection reports, drawings and photographs in an online project catalogue (Van Wicklin and Gurkan 2013: 14; World Bank 2018: 19). This created a more traceable body of evidence and made it harder to alter monitoring information without leaving inconsistencies, while enabling supervision of infrastructure projects inaccessible to bank staff (Van Wicklin and Gurkan 2013: 14; World Bank 2018: 19).

Geo-tagged photographs were also used in Afghanistan's health sector TPM to verify that monitors had physically visited health facilities (Alba et al. 2023). More recent TPM guidance points to the potential of satellite and drone imagery, as well as big data, to expand the range of verifiable information while reducing some fieldwork

costs (Harrison 2020: 7). Satellite imagery may, for example, verify visible infrastructure or use proxy indicators such as traffic around a health facility. Yet such technologies cannot establish all aspects of implementation. Dashboards can similarly improve the accessibility of monitoring data, but their effectiveness is mixed, according to existing evidence (Harrison 2020).

Data triangulation

Given the risks of collusion, fabricated reporting and methodological weaknesses identified earlier, no single TPM report should automatically be treated as definitive. Triangulation, comparing findings across different methods, actors and data sources, can help identify inconsistencies and reduce dependence on any one monitor or provider.

The World Bank's experience in Yemen suggests that TPM should be used in combination with other mechanisms such as technology (e.g. satellite imagery), community monitoring and other sources to work around severe data limitations and provide more timely evidence (World Bank 2022: 15). Drawing on its experience with TPM, the World Bank (2022: 24) is also exploring an idea of contracting a portfolio-wide monitoring agent to triangulate reporting for project specific TPMs as a complement to portfolio supervision while benefiting from additional data collection, verification and direct reporting sources.

Triangulation can also take place within individual programmes. In Afghanistan's health sector, the Ministry of Public Health reviewed final TPM reports alongside administrative and other non-TPM data sources (Alba et al. 2023: 4).

Rotating monitors

Direct evidence supporting the routine rotation of TPM personnel is limited. The Afghanistan health sector experience provides some support for independent back-checking: data were re-collected in a sample of approximately 10% of health facilities by independent monitors, while independent analysts reviewed the statistical programming files used to generate results (Alba et al. 2023: 4). Such rechecks can identify fabricated visits, systematic errors and manipulation of analysis without requiring the entire monitoring exercise to be repeated.

Since evidence on staff rotation in TPM remains limited, it should be treated as a potentially useful safeguard rather than an established good practice. In principle, periodically changing field assignments may reduce the risk that long-standing relationships between monitors, implementing partners and local intermediaries develop into favouritism or collusion. However, the drivers discussed earlier also

point to important trade-offs: TPM markets in FCAS are often thin, qualified personnel may be scarce and monitors frequently depend on trusted local relationships to gain safe access to project locations. Excessive rotation could therefore weaken contextual knowledge, community trust and operational access.

Linking TPM with broader accountability systems

Drawing on evidence from Yemen, Vuyjsteke (2021) argues that relying on TPM to track aid and financial resources without a broader system of staff monitoring and donor oversight is inefficient. Reported cases of resource diversion, falsified records, misstated project expenditure and weak controls over financial transfers pointed to broader failures in institutional risk management and accountability rather than simply gaps in field monitoring (Vuyjsteke 2021: 9–11). Therefore, the effectiveness of TPM as a corruption control mechanism is also tied to the wider accountability system in which it operates. TPM may identify anomalies, but it cannot by itself investigate misconduct, impose sanctions, recover diverted funds or correct weak financial controls. As the earlier sections described, the literature seems to agree that TPM is also not a substitute for other monitoring tools, but rather a complement.

Annex

Figure A1: Benefits and challenges of different methods in TPM.

	Why and how to use	Challenges in using
Qualitative: Depth interviews with community members	These have become the most common approach to obtaining the views of beneficiaries and community members during TPM, because they provide rich insights, allowing respondents to tell the full, sometimes complex story of their engagement with the intervention.	- They can take a long time to administer; even if the intention is to speak for just 20 to 30 minutes, individuals may want to speak for longer, and so completing a daily quota can be difficult. - In highly conflict-affected areas, open conversations can be especially likely to open up feelings that may even require Psycho-Social Support (PSS).
Qualitative: Depth interviews with project team members	- When undertaking TPM regarding the progress on an intervention, it is sensible and necessary to speak with those implementing the work. No TPM can claim to be balanced without this. - Project team members can be interviewed remotely, and it can make sense before a deployment with one or two key individuals.	- The right balance of individuals is key; it is unhelpful to speak to only senior or only junior colleagues. - Where the intervention relies on highly technical staff (such as a surgeon in a field hospital) – interviewing this person is key. - Tools have to be carefully crafted, and monitors trained, to avoid overly-defensive responses.
Qualitative: Key Informant Interviews	Key Informant Interviews with other actors (such as community leaders, other INGOs) are crucial to understanding the broader context and so highly useful for enabling the donor to be confident about the relevance and impact of an intervention.	These can be difficult to arrange in certain settings, and on occasion politically sensitive.
Qualitative: Focus Group Discussions	- FGDs ‘strength in numbers’ may make it easier to talk frankly. - Quality of discussion can be higher as a result of interaction of numerous people.	- In some communities men and women cannot come together. - Logistical challenge of scheduling multiple people at one time
Quantitative: Surveys	Robust, categorical evidence of progress of an intervention.	Cost and time of large sample sizes.

Source: Harrison (2020: 33).

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