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Covid-19, cash transfers, and corruption

Policy guidance for donors

By Inge Amundsen

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U4 is a team of anti-corruption advisers working to share research and evidence to help international development actors get sustainable results. The work involves dialogue, publications, online training, workshops, helpdesk, and innovation. U4 is a permanent centre at the Chr. Michelsen Institute (CMI) in Norway. CMI is a non-profit, multi-disciplinary research institute with social scientists specialising in development studies.

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Cash transfer programmes are being created and extended in developing countries as an economic response to Covid-19. Many donors are increasing their support for these programmes. However, the scale and speed of these programmes will intensify the corruption risks, in terms of fraud and embezzlement. This also extends to political abuse, particularism, and clientelism. Navigating the risks, dilemmas, and opportunities of cash transfer programmes via mobile telephony is important – with the right approaches for targeting mechanisms, distribution systems, monitoring, and more.

Main points

- As entire economies are shut down to control the spread of the Covid-19 virus, cash transfer programmes via mobile telephony can be a fast and efficient way to reach the poorest and most vulnerable.
- Cash transfers are considered a better way to reach the poor than food distribution and less prone to corruption, as the funds pass through fewer middlemen, thus limiting the number of officials with discretionary powers and private interests.
- Cash transfers can be very efficient in countries with existing structures and methods to deliver cash to the poor, such as previous social security nets, identified recipient groups, and widespread use of mobile money.
- Existing government cash transfer programmes can be supported and expanded to reach a larger proportion of the needy. When government cooperation is unwarranted, there are some international organisations with broad cash transfer programmes. Local NGOs can help in accessing target populations.
- Cash can still be diverted and embezzled all along the entire cash transfer chain, and the scale and speed of these programmes will intensify the corruption risks involved.
- The corruption risks are identified at four stages of the process: when funds are allocated to and managed by recipient governments; when decisions are made on who will be the recipients; when funds are handled by the distributing agencies; and when the funds are given to the end users.
- Addressing corruption challenges in cash transfer 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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The rush to deliver

When entire economies are shut down to control the spread of the Covid-19 virus, there is an urgent need to get cash to people quickly. Cash transfers can be fast and support local economies, and are well-known mechanisms to prevent people from slipping into deep poverty.¹

As of 8 May 2020, a total of 176 countries had introduced social protection programmes (or adapted existing ones) in response to Covid-19, and over a week countries and territories like Caribbean Netherlands, Cuba, Curacao, Equatorial Guinea, Fiji, Gabon, Gibraltar, Guernsey, Malta, Moldova, Slovakia, and Zambia joined the list.² Cash transfer programmes are clearly the most widely used social assistance intervention.³

Cash transfers are easier in some countries than in others. Some countries have existing social safety net structures with well-established ways to deliver cash easily, and widespread use of mobile money. Currently, India has the largest cash transfer programme. When India placed its population of 1.3 billion people under lockdown, the government launched a cash transfer programme that put 500 Rupees (US\$7) in the accounts of 204 million women who were already enrolled in one of its existing financial inclusion programmes.^{4,5}

Kenya also has cash transfer programmes for over a million people who receive 2,000 Shillings (US\$20) per month and has now added almost 100 million Shillings to cushion people from the economic effects of the pandemic.⁶ In Burkina Faso, a new US\$10 million cash transfer programme for fruit and vegetable sellers has been announced, and Colombia revealed a one-off payment of US\$108 for informal workers. El Salvador has pledged to give US\$300 to 1.5 million households in the informal economy.^{7,8}

1. Jerving 2020.

2. For a weekly update on how countries are using social protection programmes for responding to Covid-19 (a very comprehensive list of which countries are doing what, including in terms of unconditional cash transfers), see Gentilini et al. 2020 and Ugo Gentilini's blog Weekly Social Protection Links at www.ugogentilini.net.

3. Gentilini et al. 2020: 2; Tholstrup and Peachey 2020.

4. Jerving 2020.

5. However, prior to this crisis, in low income countries only 20% of the poorest were covered by safety net programmes (Tholstrup and Peachey 2020).

6. Jerving 2020; Kenya Presidency 2020.

7. Jerving 2020.

8. For a list of all countries with cash transfers as a core Covid-19 measure, see Gentilini et al. 2020: 8–87.

Most of these programmes are temporary and unconditional income transfers, in contrast to the more long-term social programmes using conditional payments, in which recipients must fulfil certain obligations such as getting their children vaccinated or enrolling them in school.

Cash transfer programmes are, for the largest part, run by governments, but the UN organisations (UNICEF, UNHCR and WFP) and the Red Cross (ICRC) also have some broad programmes – a number of which are ready for cash transfers in emergencies. NGOs and charities run only a smaller set of (largely pilot) programmes,^{9, 10} but the developments in this area have been greater over the last three months than over the last three years.

Cash handouts via electronic payment mechanisms (such as mobile phones and bank cards) are the now most widely used, much more than food vouchers. The traditional manual-based cash delivery methods are being phased out. According to several researchers, cash transfer via mobile telephony is the best way to reach the poor: it is cost-efficient and has several positive side-effects, such as strengthened local markets and increased smallholders' productivity.¹¹

Few, if any, of the alternatives to mobile telephony are suitable in a Covid-19 context. Credit cards must be produced and delivered to the recipients, and local stores need the technology to debit them. Also, a banking system with wide coverage is necessary to provide the service. Manual food and cash distribution is unfeasible in a Covid-19 context because it is unhygienic, creates queues, makes social distance impossible, and has even generated stampedes.

However, cash delivered by mobile phones leaves out at least 44% of the potential beneficiaries. Although the number of people with access to mobile money is also expanding rapidly in the poorest countries, in low income countries only 56% of people own a mobile phone and 'the offline population remains disproportionately poor, rural, elderly, and female'.¹²

An increasing number of countries are introducing and extending cash transfer programmes that use mobile phone technology to assure food security in response to

9. Peterman and Dale 2017.

10. See: <https://www.unicef.org/topics/cash-transfers>, <https://www.unhcr.org/en-ie/515a959e9.pdf> and <https://www.wfp.org/cash-transfers>. Two of the larger NGOs using cash transfers are GiveDirectly, a US-based organisation operating in Kenya, and World Vision, a Christian US-based organisation operating in 21 countries.

11. OPM 2014; O'Brien et al. 2013: 81.

12. Tholstrup and Peachey 2020.

Covid-19. An increasing number of these programmes are also being supported, or considered for support, by international aid.¹³

Corruption risks

Rolling out cash transfer programmes, when done through mobile phone technology, also involves a number of corruption risks. The corruption risks appear at four stages of the cash transfer chain: when donor funds are allocated to and managed by recipient governments; when political decisions are made on who will be the recipients and how they will be reached; when funds are transferred to and managed by the distributing agencies (ie the telecom groups and mobile money agents); and when the funds are distributed to the end users.

From donors to governments

It is highly recommended that assistance is channelled through governments,¹⁴ as governments are responsible for their citizens. Existing government cash transfer programmes should be supported and, when possible, expanded to reach a larger proportion of the needy.¹⁵ Donors should consciously align with, build on, complement, and fill gaps in government programmes. This will reduce the risk that multiple overlapping schemes are causing confusion and can lead to people ‘shopping’ around and bribing to get access to the cash.

However, even where robust systems exist, rapid vertical and horizontal expansion is challenging. Money transfers from international aid to recipient governments, and the recipient governments’ financial management, always involve some fiduciary risk. One recent example is Zambia, where US\$4.7 million of donor funds for a cash transfer programme was allegedly ‘diverted’ at the ministerial level, causing several donors to pull out.¹⁶

13. In late April 2020, the UN Emergency Relief Coordinator (ERC) called on rich country governments and international financial institutions (IFIs) for a US\$90 billion Covid-19 recovery package targeting 700 million vulnerable people around the globe. The ERC asked for much of this to be delivered through cash transfers, as they are only way to ensure basic needs are met at scale while kick-starting economic recovery (Tholstrup and Peachey 2020).

14. Tholstrup and Peachey 2020.

15. In Jordan, for example, humanitarian actors have worked quickly with the government to identify an expanded target population (UNHCR 2020b: 3). The UNHCR also has a number of examples of how refugee populations worldwide have been reached by cash transfers (ibid.).

16. The Guardian 2018.

Besides, some observers consider cash transfers to be particularly vulnerable to political manipulation and clientelism, as these programmes are usually immensely popular. Cash transfer schemes provide politicians with the incentives to reward political support. Hickey and Bukenya noted in a study on (pre-Covid-19) cash transfers in Uganda that ‘cash transfers have been adopted primarily as a form of clientelism rather than as a strategy for promoting either significant levels of poverty reduction or an improved social contract’.¹⁷

Thus, targeting can be influenced by the current government’s need to placate certain constituencies and punish others. This may mean that needs assessments are based on manipulated data, for example, and estimates can be inflated to channel assistance to one community over another.¹⁸

According to Lührmann et al.,¹⁹ 48 countries have a high risk of democratic declines during the Covid-19 pandemic, and an additional 34 countries are at medium risk.²⁰ This risk rises with increasing levels of recipient ‘bad governance’: short-term-ness, lack of transparency and accountability, low state capacity, and low trust in government.

Corruption risk assessments

Aid agencies should always undertake corruption risk assessments. An assessment of the political risk must be done, and there are numerous assessment tools available for recipient governments’ transparency, quality, and efficiency. Good starting points are the Worldwide Governance Indicators, the Corruption Perceptions Index, and the Varieties of Democracy databases.

It is preferable to carry out a risk assessment across the entire cash transfer chain. Johnsen²¹ provides a useful reference document and basic methodology for conducting such assessments, and Chêne²² provides an outline of the main corruption mitigation measures in high risk environments.

17. 2019: 1.

18. Shipley 2019: 5.

19. 2020.

20. Conversely, they found 47 countries not to be at risk of pandemic backsliding (demonstrating that it is possible to respond to the pandemic without jeopardising democratic standards).

21. 2015.

22. 2016b.

When the risks of government embezzlement and abuse are found to be (too) high, or their handling capacity found to be (too) low, donor funding should avoid exposure to recipient governments and channel funds outside of government systems.²³

Public financial management

In environments found to have an acceptable level of risk (according to the above assessment weighted against need and urgency), and with credible recipient government commitment to the international standards and principles, donor funding can be routed through recipient country public financial management (PFM) systems.²⁴

Donors will, however, have to insist and check that the existing international standards for the entire PFM cycle are adhered to.²⁵ For instance, the widely used financial management information systems (FMIS), which introduce appropriate budgeting and accounting codes, should be employed to enable transparent allocations and expenditures to respond to Covid-19.

In order to ring-fence donor funds and enhance donor confidence that they will not be mixed with government funds for ongoing expenditures, it is recommended that separate bank accounts are created along with separate budget lines. However, these also need to follow the standard financial reporting system,²⁶ to the extent possible.

Financial audits and control

In low-risk environments, the supreme auditing institutions (SAIs) can, and should, stand ready. Here, SAIs can provide audits of emergency transactions to assure value for money and identify actions to strengthen systems.²⁷

Identifying recipients

When deciding to whom to give cash transfers (and how much), the ideal is to base the decision on the objective criteria of need and vulnerability. However, political

23. Chêne 2016b: 6.

24. Chêne 2016b: 2, 8.

25. See the U4 topic pages on PFM: www.u4.no/topics/public-financial-management.

26. Gurazada et al. 2020; Chêne 2016b: 2.

27. Gurazada et al. 2020.

considerations will have to be made: at the central level, on groups and categories of people; and at the local level, on individual beneficiaries.

As with any welfare policy, there is a risk of political manipulation, as noted above (recipient government risks). At the local level, the targeting can be manipulated by local elites. They may seek to exclude or include certain populations within the scope of a programme due to local political, religious, ethnic, tribal or clan, or personal affiliations.

At the local level, when the individual beneficiaries are identified, only full transparency and accountability in decision-making can limit possible political biases. In a Covid-19 setting, one should still strive to achieve transparency and clear eligibility criteria as far as possible.

Transparency

It is pivotal that all cash transfer programmes produce, and systematically make public, information on their design, objectives, beneficiaries, budgets, and delivery mechanisms.²⁸ This information should be complete and clearly presented, in a language understandable to most of the intended beneficiaries.

The clearer people are about their entitlements in a cash transfer programme, the more likely they will be to claim it, or raise the alarm if it is interrupted or misdirected. Targeted communications could be used to connect with ‘hard-to-reach’ groups. Local NGOs can sometimes help with this, as they have the capacity to access remote populations and inform recipients about programmes.

Unambiguous eligibility criteria

Another way of preventing political bias and corruption is to promote simple and transparent targeting criteria based on independently verifiable instruments. Objective criteria, in terms of who is more vulnerable or more in need, should trump political preferences.

Clear, simple, and unambiguous eligibility criteria can also help raise awareness about rights and entitlements in the target population, as well as enhance the capacity of target communities to hold governments accountable. To avoid the abuse of social

28. ODI 2015: 13.

programmes, it is also important that actual and potential beneficiaries have access to effective and widely disseminated complaint mechanisms.

These ‘report-and-complain’ mechanisms can include stakeholder surveys, citizen or community scorecards, public hearings, and ICT-based monitoring. ICT-based monitoring is increasingly used to allow individuals to report problems or abuses and provide feedback on programmes remotely and without fear of repercussions.²⁹

Choosing partners

Agencies considering the implementation of cash handouts via mobile payments will have to explore the state of infrastructures and outreach in the location, and consider whether challenges can be overcome.³⁰ When this is done, one of the main advantages of allocating resources through cash transfers is that the funds pass through fewer hands, thus limiting the number of officials who have the opportunity to use the resources for private gain.

Nevertheless, leakages and biases may still happen. When cash transfers are made directly to the beneficiaries’ mobile phones, telecom groups and mobile money agents are necessary and crucial. These agents are primarily responsible for registering customer accounts, but they also carry – in themselves – a risk of corruption, bribery, and fraud.³¹ In December 2017, there were over 2.9 million active mobile money agents worldwide.³²

Besides, government licensing and control of telecom groups and agents can be deficient and politicised. With increasing importance and profits, the larger providers can ‘buy’ lenient regulations, market preferences, lower taxes etc. from corruptible governments. Some government officials have direct interests in these companies, and, therefore, conflicts of interest. Thus, bogus and politically exposed providers may be selected, producing inflated costs and ‘ghost’ beneficiaries as well as super-profits.³³ Recruitment, deployment, and promotions can also be influenced by family, clan, or political considerations.³⁴

29. Shipley 2019: 9; UNHCR 2020b: 20–23.

30. For an overview of how to assess the range of cash delivery mechanisms available, see O’Brien et al. 2013 and UNHCR 2017.

31. FATF 2019: 100; UNHCR 2020a: 24–25.

32. GSMA 2018: 2.

33. Shipley 2019: 5.

34. Shipley 2019: 5.

These risks can be mitigated by clear anti-corruption policies, codes of conduct for all implementing partners, procurement principles, and limiting discretionary powers.

Anti-corruption policies and codes of conduct

Anti-corruption policies and codes of conduct for private companies provide a clear means of outlining expectations of staff behaviour. The best documents include practical examples to help employees consider possible ethical dilemmas.

GiveDirectly, for instance, are using ‘a mix of prevention, detection, and auditing techniques to manage fraud. These include [...] defined staff roles, and spot checks of data captured in the field’.³⁵ There are also several types of codes of conduct for public officials. These typically start with a statement of values, before outlining the specific rules and standards in areas such as bribery, conflicts of interest, and gifts and hospitality.

Procurement principles

It is sensible, in an emergency, to stick to current or known service providers, given they have the capacity and skills. There is a risk of awarding new contracts to mobile money agents without oversight or fair competition, which can enable companies to rig bids and public decision-makers to receive favours. This can, time permitting, be mitigated by open contracting, enhanced transparency, monitoring mechanisms, and training of procurement officials.³⁶ Corporate integrity and incentives and deterrents for the private sector can also be combined to mitigate these risks.

The inter-governmental Financial Action Task Force (FATF) has developed a risk-based approach, taking into consideration the specific risks related to different industries, products, delivery channels, and country characteristics. For instance, in countries identified by credible sources as having significant levels of corruption, ‘enhanced Customer Due Diligence (CDD) measures have to be taken’.³⁷

35. GiveDirectly 2020.

36. For an overview of procurement principles and standards, see the U4 topic pages on corruption and anti-corruption efforts in procurement: www.u4.no/topics/procurement.

37. FATF 2019: 100.

Limiting discretionary powers

This also applies to situations when there is a need to partner up with local NGOs. Local NGOs can facilitate effective cash delivery systems, access remote populations, and mitigate the risk of cultural inappropriateness by informing programme design with their local knowledge. However, local partners may not possess the administrative or programme skills required to implement programmes, and training and monitoring may need to be conducted by other agencies.³⁸ Nevertheless, in emergencies, a basic recommendation is to work with established NGOs that have undergone a due diligence process.³⁹

Agent monitoring can also be done by the end users, but this is a complex and sometimes laborious process, especially with geographically dispersed agent distribution networks. However, online dashboards, mobile apps, and conversational interfaces can enhance agent monitoring systems. Data analytics and dashboards can create real-time visibility and useful benchmarks for agents, field staff, and head offices.⁴⁰

End delivery risks

At the delivery stage, individuals may falsify their records, under-report income and fail to report changes in circumstances to benefit from a cash transfer programme.⁴¹ There is also a risk that multiple overlapping schemes cause confusion and result in citizens ‘shopping’ (and bribing) to get themselves on different lists.

Furthermore, informal ‘taxes’ or kickbacks can be levied by local elites, as a form of extortion of beneficiaries when cash has been received. In particular, this happens where clientelism is the social norm, ie in situations where an individual – a patron in the higher position in a social hierarchy – will ‘help and protect’ people or groups situated lower in the hierarchy – the ‘clients.’ The patron, for example a local ruling party boss, can use his power to drain resources from legitimate beneficiaries.

These problems of unqualified recipients and extortion of qualified recipients can be mitigated through providing information to the intended recipients about their entitlements and by flagging the ensuing monitoring and evaluation mechanisms. Quick

38. Chêne 2016a: 6.

39. Ibid.

40. GSMA 2018: 3.

41. Chêne 2010: 6.

feedback loops are vital in risky and uncertain environments, and social media and, possibly, blockchain technology can be useful here.

Monitoring and control

Donors should look to work with oversight agencies such as auditors and parliaments, even when this is time-consuming. In a few countries, like Sierra Leone, auditors have set up special bodies or programmes to review Covid-19 spending.

Spot checks can also be conducted to verify how the programme is being implemented in the different localities. Some checks can be conducted (when travel bans are lifted) by external and independent consultants and local NGOs, and can be put in place quite quickly. For instance, in a randomly drawn sample of localities and some aspects of the programme implementation.

Blockchain technology

The problem of identifying and verifying recipients can also be alleviated using blockchain technology, when technological, political, and outreach circumstances allow. The blockchain is a type of distributed digital ledger hosted across a network of multiple participants. It provides a way to share information and transfer digital assets in a fast, tracked, and secure way. For instance, in a World Food Programme (WFP) pilot in Pakistan, the beneficiaries received in-kind food assistance in addition to a cash transfer, and the system reconciled, authenticated, and recorded all transactions on a public blockchain smartphone platform.⁴² A WFP project in Jordan has passed the pilot stage and is in ordinary operation.⁴³

The WFP argues that in ‘vulnerable countries lacking financial infrastructure, blockchain could help humanitarian actors roll out life-saving cash assistance in matter of days should disaster strike’.⁴⁴ Furthermore, its peer-to-peer nature removes the need for third party verification from costly intermediaries such as banks or other institutions.

42. WFP 2017.

43. Juskalian 2018.

44. WFP 2017.

As public registries have been plagued by tampering from corrupt public servants, the blockchain promises transparency and immutable registries.^{45,46}

However, for blockchain technologies to be deployed, a certain level of digital infrastructure needs to be in place.⁴⁷ Besides, the WFP uses biometric registration to ensure that the correct beneficiary is registered, and the biometric registration process may pose risks and be challenging to undertake during the Covid-19 pandemic.

Concluding recommendations

Given the above, the recommendations for donors are:

Support exiting programmes

In emergencies, such as the Covid-19 pandemic, there is no time to invent methods and delivery systems.⁴⁸ Work with experienced partners and service providers. Some countries have widespread use of mobile money, and existing and well-established ways to deliver cash. India and Kenya have been mentioned, but very fragile states, like Somalia, also have a good coverage.

Work with governments

Wherever possible, assistance should be channelled through governments,⁴⁹ as governments are responsible for their citizens. Existing government cash transfer programmes should be supported, and, when possible, expanded to reach a larger proportion of the needy.

45. Aarvik 2020.

46. For more information on the possible use of blockchain technology (and biometrics) as a means to ensure the 'unicity' and 'singularity' of identities, and the associated challenges pertaining to the security and confidentiality of personal information, see Wang and De Filippi 2020.

47. IFRC 2018.

48. Only in narrow concentrated settlements, like refugee camps, can it be worth considering the rapid innovation and rolling out of cash transfers to formerly excluded populations (see UNHCR 2020a and 2020b).

49. Tholstrup and Peachey 2020.

Do a corruption risk assessment

A risk assessment has to be done on government quality. Some minimum standards of democracy, transparency, and government efficiency have to be established beforehand, and, according to the assessment, weighted against need and urgency. If this assessment finds the risks of government embezzlement and abuse to be too high, or a particular government is insupportable, search for other ways to channel the funds.

Work with international organisations

When the risks of government corruption and abuse is found to be (too) high or their handling capacity (too) low, the alternative is to work with international organisations, in particular the UN organisations. UNICEF, UNHCR, and the WFP have broad cash transfer programmes, some of which are ready to be scaled up, and so does the International Red Cross. Check what is available and has the possibility to be topped up and broadened.

Work with NGOs

When government cooperation is ruled out and international organisations are non-existing, the second-best alternative is to work with NGOs. Although very few international NGOs and charities have extensive experience of cash transfers, some of their pilot programmes can perhaps be expanded on and supported. Also, local NGOs rarely have the capacity to manage cash transfers, but they might help identify vulnerable groups affected by Covid-19, mitigate the risk of cultural inappropriateness, and inform recipients about programmes.

Work with the private sector

Cash transfers via mobile phones are technologically and logistically challenging. Cooperation with telecom groups and mobile money agents is necessary to determine the most appropriate modalities and delivery mechanisms to reach a particular population. Transparent and competitive bidding should be employed to find the best providers (when there is a choice).

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