Best practices for monitoring aid channelled to CSOs and the state during a humanitarian disaster in a pre-existing crisis context

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Systemic corruption is known to cripple the ability of countries to respond to humanitarian emergencies. Often, in such contexts, aid meant for targeted beneficiaries are lost to kleptocratic networks and consumed by the political elite. While there is no magic formula for eliminating corruption in emergency responses and there are important dilemmas and trade-offs to be aware of when formulating anti-corruption policies, there are a number of best practices that may be applied to curb corruption in situations of humanitarian crisis.

Caveat: The best practices listed in this answer are an illustrative indication of the various existing anti-corruption methods that may be customised according to contexts of operation.

Query

Can provide us with relevant materials that would help us design our intervention in monitoring aid and reconstruction in Lebanon?

Contents

Background

Crises corrode state legitimacy, temporarily or permanently diminish the well-being of societies, and drive wedges between communities and cultures (Scott 2015). In the context of Lebanon, weak political institutions have been unable to address pervasive corruption and deep structural issues, resulting in a severely compromised rule of law, which remains one of the main conditions stifling economic freedom in the country (Freedom House 2020; Heritage Foundation 2020). Since 2011, an influx of refugees due to the Syrian crisis, has taken a heavy toll on Lebanon's service delivery, public finances, and environment, widening income inequality and worsening poverty incidence among Lebanese citizens (World Bank 2019). Intense regional conflicts also form a reality of the Lebanese milieu (Doherty and Sullivan 2020).

Lebanese politics are dominated by a group of military veterans, former militia leaders and sectarian power brokers who gained prominence

Main points

— Corruption thrives in contexts of emergencies. However, there are several existing best practices in monitoring aid for humanitarian relief and reconstruction.

— Aid transparency and standardisation of information is a requirement to avoid gaps and duplication and ensure effective reporting.

— Tracking tools (expenditure/project) are helpful to identify places where the system for transferring funds breaks down, as well as cases of mismanagement and corruption.

— Select protocols and procedures fitted to the context may help reduce risks, such as anti-corruption policies and training, codes of conduct, whistleblowing policies, and vetting and compliance procedures for partners and contractors.

— Donors, CSOs, and the state have defined roles for short- and long-term measures.

during the 1975–90 civil war that engulfed the country (Freedom House 2020). A plethora of forces that are not democratically accountable, including but not limited to deep-rooted patronage networks, religious institutions, armed non-state actors such as Hezbollah, and competing foreign powers often use a combination of financial incentives and intimidation to exercise influence on Lebanese voters and political figures (Freedom House 2020). Such a structure of power sharing among the political elite leads to intraparty competition being hampered (Freedom House 2020).

Amid the worsening economic meltdown, widespread anti-government protests broke out in October 2019, sparked by increasing value added taxes (VAT) and a new fee for WhatsApp (an online messaging service) (Human Rights Watch 2020). The protests led to the resignation of then prime minister Saad Hariri (Chulov 2019).

The existing situation of political and economic freefall in the country was exacerbated by the ongoing COVID-19 pandemic (Saikal 2020). COVID-19 is overwhelming even the most advanced and prepared health systems, and the impact on developing economies with poorly funded healthcare systems is even greater (IRC 2002). However, even prior to the pandemic the country's public debt-to-gross domestic product (what a country owes compared to what it produces) was the third-highest in the world; unemployment stood at 25 per cent; and nearly a third of the population was living below the poverty line. Within such tenuous settings, the vulnerable members of society are particularly at risk (IRC 2020).

The country, which was suffering from different crises for decades, then suffered a deadly explosion that ripped through the Beirut port on 4 August 2020 (Doherty and Sullivan 2020). The explosion was caused by the detonation of 2,750 tonnes of ammonium nitrate stored unsafely at the port for years (BBC News 2020). The blast damaged buildings in a radius of several kilometres in Beirut, killing over 200 and leaving more than 200,000 people homeless or living in homes with no windows or doors. Officials estimate that the explosion caused more than US$3bn of damage and that Lebanon's collective economic losses may amount to US$15bn (BBC News 2020).

Due to the system of chronic corruption and poor governance, demonstrations erupted in the aftermath of the explosion with citizens demanding the ousting of the country's political elite, leading to the resignation of the Lebanese government on 10 August 2020 (El-Naggar and Chehayeb 2020).

Systemic corruption is known to cripple the ability of countries to respond to humanitarian emergencies, and in turn such contexts of disaster provide a perfect storm for corruption to thrive – creating a vicious cycle (Jenkins et al. 2020). Often, in such fragile milieus, aid meant for targeted beneficiaries is lost to kleptocratic networks (Maxwell et al. 2011; Transparency International 2016). For example, Transparency International Sri Lanka suspected that over US$500 million in aid had gone missing during the 2004 Tsunami, which the government denied (The New Humanitarian 2007).

Thus, ensuring quality aid during such emergencies, especially when it comes to crisis

situations, like the one in Lebanon, requires adequate planning and execution for delivery and monitoring (Scott 2015).

Best practices in monitoring aid and reconstruction

Transparency International's Handbook on Preventing Corruption in Humanitarian Operations (2010) notes that there is no magic formula for eliminating corruption in emergency responses and there are important dilemmas and trade-offs to be aware of when formulating anti-corruption policies. For most of these dilemmas, there is no definitive answer: what is essential is finding the right balance for each particular context. For example:

- Reputational risk vs. open discussion. Some humanitarian groups are cautious about discussing corruption openly for fear of damage to their organisational reputation and fundraising ability, particularly among the public. Corruption is often not transparently reported due to a fear of donor sanctions. Yet acknowledging publicly the corruption risks often inevitable in the challenging conditions of humanitarian operations does not mean condoning corruption. Instead it lays the basis for proactive strategies to prevent it. A transparent, proactive approach to reporting and discussing corruption leads to more robust anti-corruption strategies, which strengthen organisational credibility, pre-empt media scandals and reassure individual and institutional donors.

- Too many vs. too few controls. Too many or too rigid controls can either paralyse the system or cause staff to ignore the controls altogether. But too few or too weak controls can open the door for corruption. The right balance will vary according to the strength of the organisations involved and the capacity of implementing staff.

- Urgency vs. prudence. It is often argued that the need to move quickly to save lives precludes a robust or systematic approach to preventing corruption – especially in the very initial phase of a disaster response or in poor security contexts. Certain simplified and more rapid procedures are indeed appropriate in such situations – but only temporarily. During recovery and rehabilitation phases or in a post-emergency situation, it is essential to set up proper systems, staffing and controls, even if that takes a little extra time.

- Pressure to spend vs. getting things right. In a high-profile emergency, there can be pressure from donors and the media to be seen to be responding rapidly. However, a high financial "burn rate" can lead to weak systems and poor oversight, creating opportunities for corruption. To prevent this, it's worth developing a strong "surge capacity" as part of emergency preparedness so that experienced senior staff (particularly in finance, procurement and human resources) are there to set up systems and procedures that curb corruption right at the start of a response.

- Local empowerment vs. standardised procedures and controls. Humanitarian responses should always support efforts by affected communities to recover from

4

emergencies, rather than treat them as passive victims who must be assisted. Local empowerment (including of recipient communities) and partnerships are appropriate medium-term strategies, but without an in-depth understanding of local power structures and influence groups, the empowerment of local elites could distort equitable aid provision and lead to corruption. While adapting programmes to local circumstances is useful, agencies also need to maintain some uniform policies and procedures that conform to international standards and allow comparable reporting across operations.

- Inclusion vs. exclusion targeting errors. When aid resources are limited, humanitarian agencies have to strike a balance between the inclusion of non-target groups as a result of corrupt manipulation of targeting criteria and registration, and the exclusion of groups that should have been targeted. Definitions of who should qualify for assistance may vary between agencies and affected communities. It is important to communicate clearly to communities that the inclusion of non-targeted groups generally results in the exclusion of beneficiaries most in need, so that affected communities can be vigilant against corrupt inclusion errors. It is also important to understand that affected communities may redistribute relief items according to their own perceptions of vulnerability and fairness.

- Transparency vs. staff and aid recipient security. While maximum transparency by humanitarian agencies is to be encouraged,

the highly volatile environments in which aid is often delivered means it is important to recognise that public information about the value of programme resources and their transport may sometimes jeopardise staff and benefit security, particularly in conflict contexts. In such cases, security takes priority.

- Information sharing vs. legal and liability issues. Inter-agency coordination and joint responses can help mitigate both internal and external corruption. However, such coordination requires information sharing, for example, regarding staff terminated for corruption or corrupt suppliers. Labour and liability laws in emergency-affected countries may prevent agencies from sharing this information officially; managers may need to use more informal communication channels.

Having listed these scenarios, a few best practices that may be adopted to suit the contextual realities of crisis situations are as follows.

Different approaches

Aid transparency

Aid transparency data is a key instrument for holding all stakeholders in aid delivery, including but not limited to governments, donors and civil society organisations (CSOs), accountable for their financing, improving coordination between different participants and increasing the impact of development spending (Publish What You Fund 2018).

Before the stage monitoring (Ingram 2018): transparency and accountability ought to be

viewed not only as an end but as mechanisms to improve humanitarian action. There are three aspects of transparency that are especially valuable within humanitarian financing (Development Initiatives 2017):

- Traceability: being able to "follow the money" through the transaction chain from donor to crises-affected people
- Totality: reflecting all relevant resource flows including and beyond humanitarian assistance, bridging the humanitarian and development reporting divide
- Timeliness: providing an up-to-date picture of the resources available is essential in fast-moving humanitarian settings

Standards and resources for aid transparency are available from various organisations. The International Aid Transparency Initiative, for example has developed a common open data standard (IATI Standard) for financial and project level information to make aid delivery more accessible, useful and usable. The IATI Standard is split into two main sections: the "organization file" and the "activity file" (IATI 2020). The former is associated with strategic information that is relevant to the whole organisation, such as its overall budget, bilateral country budgets and national plans. The latter segment refers to project level information, such as a specific sector, project title, description, budgets and expenditures, sub-national locations (shared as either coordinates or location name), relevant documents and results. If the responsible stakeholder (donor/CSOs) publish timely, comprehensive and forward-looking data, then such standards can provide an overall picture of assistance going to a selected recipient country,

as well as more granular information on individual donors' portfolios (Publish What You Fund 2018; IATI 2020).

In the context of crisis situations, high-quality, timely, reliable data has long been recognised by humanitarian organisations and donors as a cornerstone of effective advocacy and coordination (ReliefWeb 2020).

Value chain analysis

There are numerous approaches to monitor corruption risks that could emerge in the lifecycle of a project, including at the stage of channelling aid; however, in line with the principle of "no one size fits all", many development practitioners recommend that each organisation either develops its own bespoke tool or adapts existing methodologies to account for local contextual realities (IACC 2015).

The value chain concept when applied to development assistance may be understood as the full range of activities needed to implement a programme, from designing the intervention logic at the policymaking level through to the different phases of mobilising and procuring resources to produce goods and services to the delivery to the target community (Jenkins et al. 2018).

While the specific approach taken will vary, there are typically three major steps common to efforts to identify, track and curb corruption at different levels of the value chain (Jenkins et al. 2018):

Risk identification

The mapping exercise to identify salient corruption risks is the process of risk identification (Johnsøn 2015). It is at this stage that value chain analysis

may be particularly useful. Value chains can be conceptualised in a number of ways. Mindful of the need for each organisation to tailor standard approaches to its own use case, Jenkins, Chêne, Laberge and Loekman (2018) offer a simple model to divide a value chain into three broad levels:

- Policymaking level: at the policy formulation stage, external corruption risks to development programmes can be found both inside and outside of government. Inside the recipient government, senior public officials may distort donors' policies or take actions that enable them or their neo-patrimonial networks to benefit at the expense of the public good. Outside of government, private firms and contractors may try to exert undue influence on the development or enforcement of regulations that can have an impact on development projects.
- Organisational level: when considering the management of organisational resources, such as personnel, goods, supplies and budgets, external corruption risks can take various forms, such as embezzlement of funds during procurement processes, or patronage and nepotism in licensing and hiring practices.
- Client interface/service delivery level: at the service delivery stage, where citizens receive services, corruption risks often take the form of bribery or extortion. This type of petty corruption is usually perpetrated by low- and mid-level public officials in places such as hospitals, schools or police stations.

The purpose of this mapping exercise at various levels of the value chain is to help aid agency staff ensure that their corruption mitigation efforts do not focus unduly on highly visible threats at the expense of tackling less obvious issues that may have a more profound impact on desired outcomes (Jenkins et al. 2018).

Risk prioritisation

Such a process includes understanding the severity of identified risks using a measure of probability and a measure of impact or magnitude. This exercise may be done by evaluating the likelihood and impact of different risks through broad consultations with stakeholders and experts, as well as drawing on existing data and prior experience. Likelihood and impact can then be quantified and used to evaluate the overall risk as follows:

Likelihood (scale from 1-5)	**4**
Impact (scale from 1-5)	**2**
Risk score (Likelihood * Impact):	**4*2 = 8**

The objective of such a method is to make it easier to identify the biggest threats and help prioritise the two or three most serious risks for each stage of the value chain for inclusion in the monitoring framework, which, as described below, can take the form of a dashboard. In emergency situations, often due to external exigencies, having such a snapshot of prioritised risks may prove valuable in dealing with urgent anti-corruption needs.

Identifying anti-corruption measures

The next stage of the process involves matching each prioritised corruption risk with

corresponding mechanisms believed to reduce the vulnerability to integrity threats. These anti-corruption measures may be identified using the same method as the risk assessment; in other words, either through collaboration with experts and/or internally within the aid agency, depending on the programme context.

Monitoring measures

The next phase is to consider which indicators would be best suited to track the identified risks. Since it is difficult to measure the incidence or risk of corruption directly, an alternative strategy is to measure the effectiveness of the anti-corruption safeguards paired with each prioritised risk as a proxy.

Jenkins, Chêne, Laberge and Loekman (2018) recommend identifying or developing a number of indicators for each selected anti-corruption measure. Ideally, these various indicators should draw on information produced by a range of different data providers, such as national statistics offices, government agencies, academics, civil society organisations, the media and the private sector. In addition, aid agencies are encouraged to include their own data where relevant.

Jenkins, Chêne, Laberge and Loekman (2018) further present a taxonomy of three different types of indicator that each anti-corruption measure should be assessed against:

- Framework indicators: also known as input indicators, these are a metric for whether anti-corruption safeguards are in place to minimise corruption risks. For instance, framework indicators measure the quality of legal and policy frameworks in place, the

existence of codes of conduct and sanction mechanisms, the size of budgetary allocations and the staffing capacity, among others.

- Progress indicators: these are metrics to gauge the governance performance of a programme's implementation. They are usually objective indicators that draw on administrative data to understand the progress made in converting inputs into outcomes. Progress indicators, for instance, track the number of complaints received and addressed, changes in the absenteeism rate among civil servants, percentage cases of corruption successfully prosecuted, and so on.
- Impact indicators: also known as outcome indicators, measure long-term impacts arising from the inputs invested, the actions taken, and the short-term outputs produced. These indicators are a metric of sector-specific outcomes and impacts (which may not be directly related to anti-corruption measures), as poor outcomes in programmes may be warning signs of hidden malpractices.

A single indicator is not sufficient to obtain a comprehensive understanding of the state of affairs and to identify possible points of intervention. All indicators have weaknesses and are subject to bias in one form or another. By assessing each anti-corruption measure identified for prioritised risks, against a so-called "basket" of three to five different types of indicators, development practitioners can generate a more comprehensive picture of exposure to corruption. This approach can also mitigate the risks of making decisions based on misleading data by

combining indicators so that they offer more than the sum of their parts (Jenkins et al. 2018).

Finally, once the most salient risks have been identified, prioritised and paired with an appropriate mitigation mechanism, the effectiveness of these safeguards is periodically assessed against a number of dimensions (framework conditions, progress metrics and broader impact). This method therefore provides a relatively reliable proxy for the magnitude of corruption risks facing a development programme over time (Jenkins et al. 2018).

When completing this exercise, it is valuable to be transparent about the methodology used, and publish the following information (Jenkins et al. 2018):

- Metadata (the data describing the data; for instance how you define terms, what scoring criteria you use, your sampling methodology for survey data, etc.)
- Paradata (the data describing the process through which the data was collected, for instance the time period during which data collection took place, the names of the offices contacted, a description of enumerator training and pre-testing if you ran a survey, etc.)
- Disclosing shortcomings in data quality such as any methodological challenges, gaps in your dataset and so on. It is better to be upfront and explain how data is still relevant and valuable despite the drawbacks.

The value chain approach is explained in greater detail in Transparency International's 2017 publication Monitoring Corruption and Anti-

Corruption in the Sustainable Development Goals and in lesson six of Transparency International's online learning course, Corruption, Data and the SDGs, for which the videos can be found here and the accompanying course handbook here.

Expenditure tracking

Expenditure tracking refers to methodologies that examine how resources flow from one level to the next, and eventually to the intended beneficiaries (International Budget Partnership 2020a). Although this method is most often used to track government spending, the same principles may be applied to monitoring aid being channelled to CSOs as well as the state. By identifying places where the system for transferring funds breaks down, as well as cases of mismanagement and corruption, expenditure tracking is yet another tool to ensure that budgets are being executed on the ground as intended, and that resources are being used effectively (International Budget Partnership 2020a).

Public expenditure tracking usually involves some form of both quantitative research, such as verifying financial accounts to monitor the actual flow of funds, and qualitative research, such as interviewing users of public services about their experiences and assessments of the quality, accessibility and cost of such services. Expenditure tracking can be undertaken at the local, district or sub-national level (Malena 2010).

A few key steps in expenditure tracking are as follows:

- determining the scope and purpose of the tracking exercise

- identifying partners and key stakeholders
- designing the research/survey to determine the nature of the existing data, the effort required to access it and the types of quantitative and qualitative research that would be required. A useful method would be to trace the expenditure process from origin to destination along with other stakeholders. This would provide a starting point to be verified through further research.
- gathering and analysing the available data. Expenditure tracking usually involves two steps – tracing the flow of funds and assessing the reasons for dysfunctional practices or inefficiencies at each stage.
- public dissemination of findings and advocacy
- explore opportunities to make tracking more than a one-off exercise

A particular area of importance when it comes to expenditure tracking is the procurement process (International Budget Partnership 2020a). Minimum necessary information ought to be openly available for all contracts. The EuroPAM indicators on public procurement, for example, assess in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials. The indicators use several qualifiers such as value thresholds, publishing and record keeping, sub-contracting, bid evaluation, open competition, minimum number of bidders and institutional arrangements (EuroPAM 2020).

Due diligence

Proper due diligence requires careful background checks on potential bidders, including but not limited to performance history, ownership, financial capacity, corporate facilities and reputation for integrity. Create and disseminate list of corrupt suppliers, debarring them from future bidding. Setting up pre-supply contracts with vetted suppliers may be of value as both a short- and long-term measure (Transparency International 2010).

Donor organisations such as the Department for International Development have come up with a due diligence framework as a monitoring and risk management tool encompassing activities undertaken to assist the senior responsible owner (SRO) of a given programme in obtaining assurance of a potential delivery partner's capacity and capability to deliver DFID aid. The framework can be accessed here.

However, it ought to be noted that the implementation of due diligence processes and requirements are done in a way to not lead to inefficiencies, particularly affecting situations of emergencies (IASC 2016).

Monitoring implementation

Effective monitoring is an ongoing process of data collection in which the data collected must be used not only for accountability purposes but also to inform programming decisions and improve programme implementation in real time. When done well, monitoring plays a crucial role in making programmes flexible and adaptable to changing contexts, which is particularly relevant in complex and volatile situations of crisis (OECD

10

2012). It also ought to be noted that while there are guidance documents and toolboxes that provide overviews of different tools and best practices to monitor programme implementation in fragile settings, there is no standard framework. The monitoring implementation mentioned hereafter may be used by themselves or in combination with another to fit the contextual reality of the crisis-affected country.

Self-monitoring

Such a type of monitoring may be conducted by aid agencies or their local implementing partners. The two key factors for effective monitoring that were underlined time and again when operating in situations of crisis were trust and continuous capacity building (Beijnum, Berg and Veen 2018).

Good practices for monitoring through local implementing partners include the following (Beijnum, Berg and Veen 2018):

- Focus on building up long-term partnerships and trust relations.
- Invest in continuous capacity building, especially in terms of financial management.
- Create an environment where donors and partners can talk openly about the challenges and nuances of operating in crisis settings.
- Put protocols and procedures in place that reduce risks, such as anti-corruption policies and training, codes of conduct, whistleblowing policies, and vetting and compliance procedures for partners and contractors.
- Develop specific and pragmatic guidelines for dealing with corruption and nepotism

that take relevant protocols, procedures and policies as starting points, but adjust them to the local context.

Monitoring through third parties

Third-party monitoring has several advantages: it provides independent eyes and ears on the ground, allows validation of monitoring data from implementing partners where confidence in partner reporting is lacking, and can sometimes allow for more cost-efficient field monitoring. It is typically most useful for verifying quantitative and physical outputs of aid projects. However, there are downsides and challenges to take into consideration as well. For example, the time and resources required to make third-party monitoring work are often underestimated by commissioning agencies; they may lack the technical understanding to design effective monitoring tasks; and their use in the past has been perceived by some implementing partners as contributing to donor micro-management (Price 2018).

Good practices for monitoring using third parties include the following (Beijnum, Berg and Veen 2018; Price 2018):

- ensure there is clarity on roles, tasks, and expectations vis-à-vis other monitoring entities
- focus on acting as a sparring partner and give active feedback rather than control and accountability only
- anticipate the need for time and resources to set up and maintain effective third-party monitoring systems
- ensure that the information collected can be used to inform decisions

- use technological devices to increase control over field monitoring
- strengthen security protocols and duty of care
- coordinate use of third parties and exchange on emerging lessons
- regularly reassess third-party monitoring and its alternatives

Monitoring via technology

Transparency should be the default setting in aid disbursement, including providing all relevant parties with the necessary information to plan, coordinate and evaluate the response to the crisis Where response funds are registered in publicly available information systems, it makes it easier to identify possible red flags and increase the traceability of resource flows (Jenkins et al. 2020).

New developments in technology allow for remote monitoring of projects. Yet, technology in conflict settings faces several constraints and needs. For example, it must be able to function without a constant electricity supply, without reliable mobile and internet access, across large distances and without advanced computing skills. Bearing those restrictions in mind, four technology applications are well suited for fragile settings: handheld devices for digital data collection, mobile phone-based feedback mechanisms, remote sensing with satellites or delivery tracking, and broadcasting with radios and other forms of media (Beijnum, Berg and Veen 2018).

The Open Government Partnership has compiled practical examples on the use of digital platforms and tools as part of the COVID-19 response to keep citizens informed and nurture public participation around the world. Stakeholders can also take advantage of existing tracking initiatives such as International Aid Transparency Initiative (IATI) and platforms like the Inter-American Development Bank's Mapainversiones (De Michele and Vieyra 2020). The IATI Secretariat has released detailed publishing guidance on aid transparency during COVID-19 and has strongly encouraged organisations to publish their spending and activities during COVID-19.

Publish What You Fund (2016) has developed aid transparency principles for bodies engaged in funding and delivering aid as well as for those who deliver aid on their behalf. Online trackers should allow intended beneficiaries of funds, journalists, civil society organisations and parliamentarians to identify whether the aid reaches its target and report suspicious cases to donors. Among other things, the principles encourage public bodies to develop the necessary systems to collect, generate and ensure the automatic and timely disclosure, information on assessments of aid and aid effectiveness, such as monitoring, evaluation, financial, audit and annual reporting (Public What You Fund 2016: 1). In conversations with aid-recipient governments abroad, donor agencies should also underline their own adoption of aid transparency principles and urge government bodies to use transparent budgetary tracking tools to monitor relevant public spending (Jenkins et al. 2020). The longer term aspiration from the state would be to enhance budgetary transparency that goes beyond public procurement. For example, indicators from the Open Budget Index, including but not limited to the availability of pre-budget statements, citizens' budget, and audit reports may be set as benchmarks for best practice to aspire to in the long run (International Budget Partnership 2020b).

Several donor agencies such as the Department for International Development (DFID) have developed an open platform which allows the exploration of detailed information on international development projects funded by the UK Government. The tracker is built using open data published by UK Government and partners, using the IATI standard (UK Aid 2020).

A few good practices that may be kept in mind while using technology in fragile contexts are as follows (Price 2018):

- take the time to study the context before choosing tools
- involve all users actively and establish informed consent practices
- provide back-ups and alternatives
- use security-conscious, free and open source software
- minimise and limit data
- invest in building acceptance and training
- pool funds and risks
- apply humanitarian principles to technology

Monitoring roles

CSOs

Civil society organisations (CSOs) can be valuable local allies in preventing corruption, whatever their specialisation, and can contribute to greater accountability to wider society and beneficiaries (Transparency International 2010). They can especially provide a grassroots vision of how a support package has actually been implemented (IMF 2020).

An example of a social accountability mechanism is the Integrity Pact tool developed by Transparency International back in the 1990s as a method for preventing corruption in public contracting. It is essentially a document signed between a contracting authority, bidders and an independent monitor. Legally binding, it commits all parties to comply with anti-corruption best practice and allows the monitor to make sure this happens. Monitors follow the whole procurement process, from design to implementation. They commit to maximum transparency, and all monitoring reports and results are made available to the public on an ongoing basis (Transparency International 2020).

Transparencia Mexicana (TM) adapted the Integrity Pact concept into a social witness model, whereby it served as the civil society coordinator to appoint a social witness to oversee procurement related to two major dam projects in El Cajón (tender in 2002, construction completed in 2007) and La Yesca (tender in 2006/2007, construction started in 2008 and completed in 2012) (Basel Institute on Governance 2019).

In the current context of the COVID-19 pandemic, for example, CSOs have been asked in some countries, such as Nigeria and Ghana, to help provide information to citizens about the disease and prevention measures, and there has been discussion about using these opportunities to also inform citizens about support policies and how to monitor them. Observatorio Fiscal of Chile has been analysing controversial procurement decisions related to the pandemic. A CSO (ICEFI) in Guatemala is instrumental in monitoring the implementation of emergency measures (IMF 2020).

State

Governments of emergency-affected countries generally have a major role to play in coordinating international and national responses to emergencies, as well as in helping create neutral space for the delivery of humanitarian aid and setting an example of zero-tolerance for corruption (Transparency International 2010).

However, in scenarios of systemic corruption and weak governance mechanisms, it becomes all the more crucial to ring-fence support to programmes designed to improve governance and financial management of key systems, as well as promote two-way transparency in government-agency relations (Transparency International 2010; Jenkins et al. 2020).

Timescales

SHORT-TERM MEASURES

Taking an anti-corruption stance from the start

There might be a spike in corruption incidences during humanitarian operations due to the huge and sudden influx of funds and vast opportunities for the discretionary use of these resources, which may overwhelm existing accountability tools. Hence, donors, civil society and national governments should acknowledge the risk of corruption, including being internally open about the huge risk associated with funding in humanitarian crises, while simultaneously being open about their anti-corruption stance and policies with external audiences (Jenkins et al. 2020).

It is important for donors, civil society, and the government to be unequivocal in their messaging

and communication that corruption is not a tolerable cost of doing business during humanitarian crises. During this COVID-19 pandemic, the IMF acknowledged the importance of setting an anti-corruption tone and that funds will be monitored, with the fund's managing director warning national governments to "spend what you can but make sure [you] keep the receipts. We don't want accountability and transparency to take the back seat" (Georgieva and Rice 2020).

Allocation of resources for monitoring and evaluation

The strong tone on anti-corruption must be accompanied by the allocation of specific funds in each funding programme for evaluation and audit, as well as ring-fencing resources to programmes designed to improve governance and the financial management of key systems (Jenkins et al. 2020).

Donors and civil society may encourage and support government efforts to "immediately establish transparently appointed oversight task forces that include not only ministry staff but also representatives from the national audit office, experts from civil society and similar bodies" Steingrüber (2020). In addition, the government should be encouraged to empower these task forces to monitor financial budgets and to investigate all issues regarding any misuse of funds and instances where paid goods and services do not materialise (Steingrüber 2020).

Donors can also firmly encourage partner governments to uphold accountability systems during states of emergency and permit the justice system to continue to investigate and prosecute

corruption cases in an impartial manner (Steingrüber et al. 2020).

Real-time auditing

Transparency International chapters in Latin America recently launched an anti-corruption guide for emergency public procurement in response to the COVID-19 pandemic. Though targeted primarily at national authorities, the guide includes elements that could be adapted by donor agencies, such as real-time audits, the use of a single (preferably digital) platform, the publication of purchase and contracting information in an open data format, and the establishment of grievance mechanisms to help identify irregularities. Schultz and Søreide (2006) also recommend that donors include procurement as a focus in real-time audit evaluations to identify corruption risks. These exercises "involve a rapid, interactive peer review of humanitarian response on the agency or inter-agency level. The aim is to provide simultaneous recommendations that can be quickly implemented by currently-deployed staff" (Schultz and Søreide 2006).

Multi-stakeholder approaches

It is important to establish and enhance coordination between donors, government bodies and non-governmental organisations active in the country. Such collaborations between agencies working in the same humanitarian setting could monitor and minimise the potential for corrupt practices such as "double-dipping" created by duplication and overlap in emergency support. As such, information sharing is key, particularly with regards to any corruption schemes that different stakeholders have discovered in their own operations (Jenkins et al. 2020).

In the medium term, Transparency International (2014) recommends building a culture of cooperation between stakeholders that ranges from agreements on pre-arranged responses to incidents of corruption (both internal and external to donor agencies), coordinating funding requests and resource allocations, sharing lessons learned and disseminating lists of debarred staff, partners and suppliers.

An important principle should be to crowdsource accountability by engaging civil society organisations, journalists and state anti-corruption bodies to act as watchdogs on grant disbursement and holding implementing entities to account. These actors often play a key role in supporting budget tracking measures and monitoring procurement systems, and to provide crucial feedback from aid recipients (Jenkins et al. 2020).

LONG-TERM MEASURES

Auditing

A well-audited programme will likely expose corruption and allow the rectification and improvement of existing safeguards. The public communication of such long-term auditing may deter corrupt behaviour by conveying a clear message that those with discretion over resources will have to account for their conduct later (Jenkins et al. 2020).

As audits rely on an effective paper trail to successfully track the movement of funds and the use of procured goods and services, it is useful to appoint a records custodian at the start of the programme and specify a clear records retention policy, if this is not already the case (Transparency International 2014). Ensuring accurate and

thorough documentation of emergency procedures is key as are clear lines of accountability for these decisions. It is important to note that community-led audits will require full access to project information to determine whether the allocated resources reached their intended beneficiaries (Jenkins et al. 2020).

In addition to conducting thorough audits of their own programmes, donors and civil society should encourage governments to make relevant information on how emergency relief funds have been made available to independent auditors, particularly in high-risk areas like health, public procurement, infrastructure and social security expenditures (Jenkins et al. 2020).

Monitoring and evaluation in the long term

Beyond narrow financial audits, broader monitoring and evaluation of humanitarian programmes should incorporate assessments of corruption. Donors and development agencies can refer to existing benchmarks, such as the OECD's Quality Standards for Development Evaluation. Evaluations should gather reports of potential corruption in the programme's operations, perspectives on the effectiveness of controls in areas such as human resources and finance, as well as perceptions of the agency's integrity among stakeholders (Jenkins et al. 2020).

To improve accountability, monitoring activities should include affected communities through various mechanisms. These include stakeholder surveys, citizen or community scorecards, or public hearings. Due to the current pandemic, restrictions on movement during lockdowns may pose a challenge for evaluators to comprehensively assess programmes, engage citizens and other key

stakeholders who can provide valuable information to verify programme outcomes. Hence, programme evaluators could devise mechanisms to ensure reliable monitoring and evaluation, such as the introduction of ICT-based monitoring and allowing individuals to report problems or abuses and provide feedback on programmes remotely.

The evaluation teams should also be representative of a broad range of stakeholders and able to provide an objective assessment. They should make a concerted effort to provide vulnerable groups, such as women, girls and minority groups, with the possibility to provide feedback without fear of repercussions.

Information obtained from audits and programme evaluations should be used as part of a feedback loop to strengthen development agencies' integrity management systems and minimise the risk of corruption in future responses to humanitarian crises (Jenkins et al. 2020).

Support to non-state actors

Non-state actors such as the media and civil society play a vital role in monitoring aid by exposing corruption. Recently, donors have been called to "invest heavily in local in civil society [to] reinforce the creation of new voices and new leadership in damaged communities" and improve the downwards accountability of responses to the COVID-19 pandemic (Global Initiative Against Transnational Organised Crime 2020). Others have gone a step further, encouraging donors during the pandemic to establish a "dedicated fund to ensure civil society and journalists are able to continue their important operations during this time" (Steingrüber 2020).

Hence, it is important to support enhancement of civic space, ensure freedom of information and expression, and protection of whistleblowers to enable civil society organisations, media and concerned citizens to prevent and uncover the mismanagement of funds, fraud and corruption (Jenkins et al. 2020).

Investing in state accountability and oversight actors

Finally, there is need to invest in long-term institutional support to state bodies, such as the auditor general, anti-corruption agencies, law enforcement and prosecutors. While there will be pressure to redeploy these resources to short-term crisis management measures, governments with limited political will to tackle corruption might take the opportunity to reduce resources to these bodies, which could affect their capacity to fight corruption (Basel Institute on Governance 2020). In such circumstances, continued donor support – both vocal and financial – to these institutions becomes critical. Likewise, given the real risk that aid may end up in offshore bank accounts, (Andersen, Johannesen and Rijkers 2020), development agencies should continue to support oversight agencies, supervisory authorities and financial intelligence units.

For longer-term economic recovery measures, stakeholders should back measures to establish dedicated oversight bodies for the management of aid and to encourage the participation of all relevant stakeholders to support and monitor national policies (Steingrüber 2020; Jenkins et al. 2020).

Annex I: Illustrative indicators for value chain analysis

(Source: Jenkins, Chêne, Laberge and Loekman 2018)

Indicator type	Illustrative examples
Framework indicators	• Right to Information Rating (by Access Info Europe and the Centre for Law and Democracy) • Open Budget Index (by the International Budget Partnership) • Public Expenditure and Financial Accountability (PEFA) indicators (by the World Bank) • Existence of legislation providing public access to information related to budgets, expenditure, accounting and procurement records at school level • Accessibility of all local budget documents (via government websites or the centralised online platform that the CSO consortium is building) • Public access to the minutes of tender-opening meetings with scores obtained by various bidders • Primary expenditures as a proportion of original approved budget, by sector (expenditure of governments as well as CSOs may be mapped) • Existence of an independent unit/agency to investigate complaints against staffing decisions and administer sanctions • Existence of a whistleblowing/complaint mechanism for any witness/victim of bribery by utility officials
Progress indicators	• Local per capita budget allocations for relief, poverty eradication and reconstruction • The proportion of contractors for which a recent audit or public expenditure tracking survey is available • Number of complaints about aid delivery, and the percentage of complaints acted upon
Impact indicators	• Proportion of the population satisfied with their last experience of humanitarian assistance • Percentage of households/private entities reporting having paid a bribe to obtain humanitarian assistance

Annex II: Illustrative indicators for budget transparency and public procurement

Indicator type	Illustrative examples

Budget transparency
 	
(Source: International Budget Partnership 2020b)
	• Public availability of budget documents such as:
	  a) pre-budget statement
	  b) executive's budget proposal
	  c) enacted budget
	  d) citizens budget
	  e) in-year reports
	  f) mid-year review
	  g) year-end report
	  h) audit report

Public procurement
 	
(Source: EuroPAM 2020)
	• What is the minimum contract value above which the public procurement law is applied (for goods, services and works)?
	• Is there a requirement that tender documents must published in full?
	• Are any of these documents published online at a central place?
	• Is it mandatory to keep all of these records?
	  a) public notices of bidding opportunities
	  b) bidding documents and addenda
	  c) bid opening records
	  d) bid evaluation reports
	  e) formal appeals by bidders and outcomes
	  f) final signed contract documents and addenda and amendments
	  g) claims and dispute resolutions
	  h) final payments
	  i) disbursement data (as required by the country's financial management system)
	• Is it mandatory to publish information on subcontractors in some cases?
	• Is there a ban on mentioning specific companies or brands in tender specification/call for tender?
	• Is there a preferential treatment for local/national companies?
	• Are there restrictions on allowable grounds for tenderer exclusion?
	• Are some bids automatically excluded? For example, lowest/highest price; unusually low price, etc.
	• Are there regulations on evaluation committee composition to prevent conflict of interest?
	• Are scoring results publicly available?
	• Does the law specify the location for publicising open/restricted/negotiated calls for tenders?
	• Is there a procurement arbitration court dedicated to public procurement cases?

Annex III: Summary of recommendations for development agencies during the COVID-19 pandemic (these may also be applied to the crisis context in Lebanon)

(Source: Jenkins, Khaghaghordyan, Rahman and Duri 2020)

Messaging and communication

Internal

- Be unequivocal that corruption is not a tolerable cost of doing business during the response to COVID-19.
- Encourage open discussions about the risks of corruption in humanitarian environments as part of a commitment to minimise it as much as possible.
- Establish formal and unambiguous lines of accountability for decision making.
- Designate dedicated anti-corruption focal points in embassies in high-risk countries.

External

- Leverage influence with aid-recipient governments to underscore that tackling corruption is central to ensuring effective crisis management.
- Emphasise the importance of civic space, freedom of expression and whistleblower protection in assisting timely and effective responses to the public health crisis.
- Encourage governments to appoint capable figures to head the national response to the COVID-19 crisis.
- Support efforts by national health ministries to establish transparently appointed COVID-19 oversight task forces that include representatives from the national audit office, experts from civil society and similar

bodies. Encourage national governments to empower these bodies to monitor pandemic related financial allocations.

- Back measures to establish dedicated oversight bodies for the management of stimulus funds.

Transparency

- Work as transparently as possible ("open by default") to provide all relevant parties with the necessary information to plan, coordinate and evaluate the response to the pandemic.
- Register emergency response funds in dedicated information systems available to the public.
- Make use of existing tracking initiatives, such as IATI and platforms like the Inter-American Development Bank's Mapainversiones. The IATI Secretariat has released detailed publishing guidance on COVID-19 related spending.
- Urge aid-recipient governments to utilise transparent budgetary tracking tools to monitor relevant public spending.
- In addition to financial data, publish activity plans and clearly link spending commitments to stated desired outcomes.
- Use clear, objective and transparent criteria to identify intended beneficiaries.
- Ensure that those eligible for assistance are made aware of the nature and level of

support they are entitled to, and the method by which this will be delivered. Online platforms, social media and community radio may be valuable channels to communicate this information.

- Use digital technologies where possible to increase programme effectiveness while reducing the need for physical contact that may heighten the risk of contagion.

Multi-stakeholder approaches

- Explore how to improve coordination with other donors, government bodies and NGOs active in the country.
- Be sure to share information related to any corruption schemes that donor agencies uncover in their own operations.
- Consider channelling funds jointly with other donors through established mechanisms, such as multi-donor trust funds and the Global Fund that could be adapted or repurposed to channel humanitarian assistance in the context of COVID-19.

Preventive measures

- Identify and reinforce existing systems that have robust anti-corruption procedures rather than devising new integrity management systems.
- Crowdsource accountability by engaging civil society organisations, journalists and state anti-corruption bodies as much as possible during the COVID-19 crisis.

Clear guidelines

- Develop written guidelines as soon as possible and disseminate to all staff so everyone is clear about procedural freedom and boundaries in the current emergency.
- Establish qualitative criteria and time limits for the initial crisis period during which special procedures can be used.

Due diligence

- Conduct risk-based due diligence where possible, prioritise partners presenting higher risks.
- If ex-ante due diligence is not possible due to urgency, be sure to complete due diligence processes after the first disbursement of funds.

Procurement

- Include experienced procurement staff in emergency response teams.
- Continue to maintain a separation of duties in finance teams and decision-making committees to prevent conflicts of interest that can result in corruption.
- Where procurement staff are granted some additional freedoms, such as the ability to solicit quotes orally and shorten application deadlines, set clear limits on the use of emergency non-competitive processes.
- Continue to issue contracts and document transactions, as well as document exceptions to standard procedures, even after contracts are signed.
- Include anti-corruption clauses in contracts.
- Where pre-approved lists of suppliers and partners are available, use these to procure

goods and services from suppliers with established track records and mobilise organisations with extensive experience in disaster response.

- Solicit as many offers as possible and involve at least two people in evaluating these offers.
- Collect as much high-quality data as possible on suppliers and prices during the tendering stage. This will be critical for pursuing disciplinary action against fraud and other irregularities later.
- Where they exist, remove the paywalls that donor-funded tender notices are locked behind.
- Publish all emergency contracts in full open data format, including names and beneficial ownership information of companies awarded contracts, as well as terms of payment, delivery and value.
- Encourage civil society to monitor procurement procedures.
- Publicise complaint and grievance mechanisms for applicants and protect whistleblowers to help identify red flags and irregularities.
- Set aside designated resources to conduct spot checks on the quality of goods and services.

Audits

- Set aside specific and substantial resources in each programme for ex-post evaluation and audit, and widely communicate this decision to deter potentially corrupt behaviour.

- Where not already the case, appoint a records custodian and specify a clear records retention policy.

Support to non-state actors

- Invest heavily in local civil society to improve the downwards accountability of responses to the COVID-19 response.
- Consider establishing a dedicated fund to ensure civil society and journalists are able to continue their work.

Support to state actors

- Ring-fence support to programmes designed to improve governance and financial management of key systems, particularly in the health sector.
- Maintain existing institutional support to state anti-corruption bodies, such as anti-corruption agencies, law enforcement and prosecutors, even in the face pressure to redeploy these resources to short-term crisis management measures.
- Consider expanding support to oversight agencies, supervisory authorities and financial intelligence units as well as border control and customs officials.

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