

U4 Helpdesk Answer 2019:2

Managing corruption challenges in humanitarian settings

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Delivering humanitarian assistance efficiently and equitably in conditions conducive to high levels of corruption requires strong risk management processes. While further systematic research is still needed on which approaches work best, there is a considerable amount of literature available on the recommended tools aid agencies can deploy to manage corruption challenges.

U4 Anti-Corruption Helpdesk

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Query

We would like to gain a better understanding of how corruption works in humanitarian settings, including an overview of the principal challenges and how these might be prevented and managed. We would further like to assess the level of evidence on what works and what does not and the lessons which have been learned from humanitarian crises to date.

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Corruption challenges in humanitarian settings

Overview

The distinct nature of humanitarian assistance and the conditions in which humanitarian operations unfold present substantial corruption challenges. Aid agencies commonly work in countries where the existing institutional environment is weak and there are high background levels of corruption. When humanitarian crises emerge in these settings, donor agencies are often expected to directly manage the distribution of finite, valuable resources to vulnerable people. This work is often undertaken within urgent timeframes with strong pressure to distribute aid quickly. In many circumstances,

Main points

- The high level of vulnerability in the humanitarian sector to corruption challenges is increasingly recognised. The level of discussion and openness around the topic is gradually improving.
- Corruption challenges in humanitarian settings vary significantly according to contextual conditions. Risks are present across the programme cycle with corruption taking diverse forms. These are not limited to financial forms of corruption and include sextortion, nepotism and political interference.
- There are existing detailed resource texts on preventing and managing corruption risks (see in particular Transparency International 2014 and 2017) which provide various tools in these areas. This briefing summarises the key measures.
- There is also a growing number of country case studies which provide valuable examples of lessons learned from humanitarian crises.
- Nevertheless, there has been little systematic evaluation of which anti-corruption measures have proven to be the most effective. This is a gap in the literature where further research is needed.

populations in need of assistance can be hard to reach as a result of environmental or security reasons, and aid agencies may lack detailed knowledge of the local environment. All of these conditions exacerbate the existing corruption risk factors that agencies face when working in humanitarian settings (Transparency International, Feinstein International Center, Humanitarian Policy Group 2008; Transparency International 2014; Transparency International 2017).

Despite the severity of the problem, several key resource texts on the topic refer to a historical lack of openness among aid agencies about corruption issues (Haver and Carter 2016; Transparency International 2014). This stems from a tension between the imperative of delivering assistance rapidly and the difficulties of working in environments affected by pervasive corruption. Unwillingness on the part of aid agencies to share information about corruption in their operations that could potentially discredit their mission may have obstructed a deeper understanding of corruption challenges in humanitarian settings and the most effective means of managing the problem. As a 2015 blog by Humanitarian Outcomes put it: “there is no shortage of rhetorical commitments to combatting corruption...But these tend to be narrowly organisational and miss or deliberately steer away from some of the main ways in which humanitarian assistance is being abused and diverted” (Relief Web 2015).

Encouragingly, as new approaches and analyses have emerged over the last decade (see in particular Transparency International 2014 and Transparency International 2017), attitudes to the topic among aid practitioners appear to be changing. However, studies on the topic continue to find that in practice “many development agencies are struggling with how to embrace the risk inherent in the contexts where they work while

at the same time responding to concerns about protecting aid funds from misuse” (Hart 2016).

It is not only the reputation of the aid agency with stakeholders in the emergency environment and in the agency’s home country that is at stake (Transparency International, Feinstein International Center, Humanitarian Policy Group 2008). If not properly managed, corruption in humanitarian operations can undermine both the quantity and quality of aid programming, and even compound corruption issues in the emergency environment itself. In some cases, poorly managed humanitarian assistance can fuel insecurity by providing incentives for continued conflict (see, for example, a discussion of the role of aid in conflict in Sudan by Keen 2008). In this way, corruption in humanitarian assistance can engender corrupt practices that have long-term negative effects on human development.

Contextual variation and forms of corruption

The corruption challenges in humanitarian settings vary according to different contextual factors. In seeking to understand the dynamics of corruption in a given environment, some of the most important interrelated conditions include:

- the legal and institutional framework in the host country, which will influence how well the rule of law is upheld, and the capacity of the host government to support the delivery of humanitarian assistance
- the political economy in the humanitarian setting and the power structures at work in managing the distribution of resources
- the security situation and the extent to which aid agencies must negotiate access to hard-to-reach populations
- the types of actors involved in the delivery of aid, for example, whether aid is delivered directly or through partner organisations

- the forms of resource being made available, such as cash programmes, food, shelter or long-term reconstruction support
- the aid architecture in the humanitarian setting and the level of coordination between different aid agencies (Transparency International 2017; Transparency International, Feinstein International Center, Humanitarian Policy Group 2008)

Forms of corruption in humanitarian settings extend beyond cash bribes and other forms of financial corruption to include the fraudulent diversion or theft of resources, the denial or granting of access to resources to serve political ends, extortion of affected populations, nepotism in recruitment practices in aid agencies as well as sexual exploitation of those (predominantly women) seeking access to aid. The exact nature of corruption encountered will further depend on the form of aid being provided, whether this is shelter, food, healthcare, sanitation, longer-term infrastructure development or all-encompassing support, such as in refugee camps.

It is critical to recognise that some groups of people are more vulnerable than others to various forms of corruption in these settings. Studies of gender and corruption have shown how women and girls experience corruption differently and, as primary service users, may be more adversely affected by the problem (Transparency International 2016a.).

These risks are heightened in humanitarian settings where the need to access services is acute. Women and girls are often exposed to sexual exploitation and abuse in attempting to access the resources they are entitled to. This can have long-term physiological, psychological and social consequences (Transparency International 2009). A more recent study has also taken a gender perspective on corruption encountered during

forced and irregular migration (GIZ 2017). It highlights the vulnerability of women and girls at different stages of the migration process and the intersection between sexual violence and forms of corruption in these settings.

Corruption challenges throughout the programme cycle

While recognising that the type and level of corruption risk varies according to context, there are certain commonalities across the humanitarian programme cycle. One of the first publications on this topic prepared by the Overseas Development Institute (ODI) and Management Accounting for NGOs (MANGO) (2006) provides a useful step-by-step approach to mapping the corruption risks in humanitarian programmes, breaking these down across the following phases:

- initial assessment, decision to respond and programme design
- fundraising and allocation of funding
- working with local organisations
- procurement and logistics
- targeting and registration
- implementation and distribution
- finance, administration and human resources
- monitoring, reporting and evaluation

In the following section, each of these stages is considered briefly with reference to the ODI and MANGO report (2006) as well as Transparency International's more recent Handbook on Preventing Corruption in Humanitarian Operations (2014). This section does not intend to imply that these problems occur in all operations but rather highlights the types of issues which are frequently reported in the literature.

Initial assessment, decision to respond and programme design

The process of deciding the shape, size and location of a programme can be manipulated by local elites. They may seek to exclude or include certain populations within the scope of a programme due to political, religious, ethnic, tribal or clan or personal affiliations. This may mean that a needs assessment is based on inaccurate data, for example, where needs estimates are inflated to channel assistance to one community over another.

Fundraising and allocation of funding

Inflated costs or beneficiary numbers can be used by local elites or programme staff to generate surplus funds that can then be diverted. Bogus organisations may be set up to receive funding allocations. There may be duplicate funding of projects or overheads.

Working with local organisations

It is common for programmes to be implemented through partnerships with local organisations. The process of deciding which partner to work with could be influenced by corruption, such as bribes or kickbacks to staff or offers of employment. Staff may collude with a partner organisation to make false assessments of their work. The partner organisation itself may have a poor reputation for integrity or, in some environments, may have connections to armed or terrorist groups. These risks are greater in remotely managed programmes where agency staff have had to withdraw from the field due to security concerns.

Procurement and logistics

Procurement is a key risk area in humanitarian operations as a high proportion of goods and services are contracted to implementing contractors and partners. Agencies need to be alert

to corruption risks throughout the procurement process, from manipulated tender specifications, prequalification requirements and bidding documents to collusion, bribery or bias in the tender evaluation or award through to weak monitoring of the contract and the supply of substandard goods or services.

The logistical challenges facing aid agencies in humanitarian settings can be immense. This can start with the need to get goods through ports and/or across borders where requests for small-level bribes may be commonplace. Goods may also be lost on route to the populations concerned, particularly in conflict-affected countries where transporters may be extorted or bribed to divert supplies.

Targeting and registration

Aid may not reach its intended beneficiaries if there is bias and corruption in the targeting criteria. The manner in which lists of beneficiaries are drawn up can be controlled by local elites to exclude or include certain groups. Less powerful groups, such as women and children, may find it difficult to be properly represented and may be ignored by local relief committees. Groups unaffected by the emergency may come to the area to obtain resources. There may be multiple or “ghost” registrations.

Implementation and distribution

Staff or implementing partners may divert goods for personal gain. Sextortion to gain access to resources is perhaps most prevalent at this stage of programming. In some environments, agencies and/or partners may have to negotiate with gatekeepers, such as armed groups, who seek payment in exchange for allowing access to affected communities. Agencies ultimately may not have full control over who is receiving the aid.

Finance, administration and human resources

Recruitment of agency staff can be affected by nepotism and conflicts of interest, particularly when there is a need to rapidly build up local staffing capacity. Recruitment decisions could be influenced by family, tribal, clan or ethnic considerations. Problems of nepotism and bias can also continue into influencing staff deployment plans or the promotion and supervision of staff. In some cases, it is possible for there to be political interference in human resourcing of aid agencies and/or partner organisations.

It is common for field operations to rely extensively on cash, and some programmes may involve direct cash transfers or cash-for-work components. This creates risks around the potential embezzlement of funds. Asset misappropriation or the personal use of agency property is a related issue. These problems may be hidden by improper accounting.

Monitoring, reporting and evaluation

Monitoring, reporting and evaluation of programmes is an important means of identifying potential corrupt activity in operations and determining whether aid is reaching its intended beneficiaries. These processes can, however, be undermined by corruption should reports be falsified or exaggerated to serve personal ends. Monitoring and evaluation personnel may lack independence from agency staff and/or partners.

Preventing corruption risks in humanitarian settings

Overview

This section provides an overview of the measures aid agencies can take to minimise the occurrence of corruption in their operations prior to engagement in humanitarian settings. There is some overlap with the following section, which discusses the

strategies and tools available to agencies for managing corruption issues once in the field.

The basis of any corruption prevention programme rests on strong leadership and an open culture. As noted in the previous section, however, transparency within aid agencies about the corruption challenges they face has not always been evident due to the fear of the reputational consequences for agencies should reports of corruption become public. Some practitioners also contend that, if corruption issues are brought into the open, new administrative barriers to the necessarily rapid disbursement of aid might be erected in the form of robust anti-fraud controls (see Guardian 2016 for a discussion of these arguments among non-governmental organisations). Nonetheless, open discussions between agencies would allow them to develop more nuanced understandings of corruption and adapt their programmes accordingly. As the Transparency International Handbook on Preventing Corruption in Humanitarian Settings states: “Discussion of corruption needs to be brought more into the open, with a clear emphasis that addressing it is not the same as condoning it or implying an agency’s particular vulnerability to it” (Transparency International 2014).

In establishing an overarching preventive framework, the Humanitarian Accountability Partnership (HAP) Standard in Accountability and Quality Management (2010) provides a ready reference standard which is widely supported by development agencies. Prevention of corruption is at the centre of ensuring agency accountability.

Accountability is defined in the standards as the “process of taking account of, and being held accountable by, different stakeholders, and primarily those who are affected by the exercise of power”. The HAP Standard Principles, in which

impartiality is of particular relevance here, include independence, a duty of care, offering redress and transparency. These are supported by a proposed accountability framework. This covers six areas: establishing and delivering on commitments; staff competency; sharing information; participation; handling complaints; and learning and continual improvement (HAP 2010). Many preventive measures specifically targeted at corruption are covered in these areas.

Specific anti-corruption measures

Corruption risk assessments

Aid agencies should undertake corruption risk assessments as a basis to incorporate anti-corruption measures into humanitarian programmes. An assessment could be carried out at the project or country level, or across a thematic consideration of certain forms of humanitarian assistance. Noting a scarcity of risk management literature which specifically treats corruption risks, Johnsen (2015) provides a useful reference document and basic methodology for conducting such assessments.

Johnsen outlines a four-step methodology which begins with the identification of risks, essentially the types of corruption issues prevalent in the environment, as well as the establishment of a tolerable level of development, fiduciary and reputational risk. Second, the level of risk is assessed in terms of the probability of a given incident occurring and the anticipated impact of the event should it occur. Third, the calculated level of actual risk is compared to the stated levels of tolerable risk to determine if proactive mitigation measures are required. Finally, there is the selection and usage of the most cost-effective corruption risk mitigation tools. A range of such mitigation tools are discussed later in this paper.

Anti-corruption policies and codes of conduct

Anti-corruption policies and codes of conduct provide a clear means of outlining an agency's expectations of staff behaviour. Two recently published examples by development agencies include the Gesellschaft für Internationale Zusammenarbeit (GIZ) Code of Conduct (2017) and Agence Française de Développement (AFD) Group Anti-Corruption Code of Conduct (2018). These documents typically start with a statement of values before stating specific rules and standards in relevant areas such as bribery, conflicts of interest, and gifts and hospitality. The best documents include practical examples to help employees consider possible ethical dilemmas. Some international aid agencies publish separate policies around sexual exploitation and abuse (Care International 2017; Oxfam 2018).

There is some discussion in the literature on the merits and flaws of policies that state a "zero tolerance" approach to bribery and corruption. Some experts have argued that it can reduce the amount of information sharing on corrupt practices (Transparency International 2017) and that it is "folly to expect that all types of corruption can be eliminated in any context, let alone in poorly governed countries" (Johnsen 2015).

Zero tolerance might alternatively be used to communicate a principled ambition provided it is accompanied by clear operational guidance and risk management processes. As articulated by De Simone and Taxell (2014), "zero tolerance policies should translate not to zero appetite for risk, but rather to adequate risk management processes".

Internal controls: human resources, finance and procurement

In response to the risks around recruitment and managing staff outlined in the previous section, the Transparency International Handbook on

Preventing Corruption in Humanitarian Operations (2014) recommends developing “effective, fair and transparent human resource policies”. These should cover “recruitment, appraisal, training, promotion, rewards and succession planning [to] help prevent favouritism or discrimination”. The handbook further recommends specific policies on nepotism and conflicts of interest. Agencies should have vetting processes, including thorough background checks on staff to be recruited.

As for the controls necessary to manage finance in emergency settings, and especially large amounts of cash, one useful resource cited in the handbook is the Ernst & Young Framework for Improving Internal Controls for Humanitarian Aid Organisations (2015). The guide covers key areas of financial controls including budget preparation and requisition approval, purchasing processes, inventory management, cash receipts and disbursement, petty cash management and best accounting practices.

There is specific guidance available concerning appropriate procurement procedures in humanitarian settings. The DG Echo Humanitarian Aid Guidelines for Procurement (2011) represent a comprehensive set of standards, which include the mandatory principles of ethics and transparency in the procurement process. The guidelines outline tendering procedures to ensure equal treatment of bidders and value for money. There is a procedure for urgent actions, based on a single bidding negotiated procurement, and specific guidance on food aid procurement as well as procurement of pharmaceutical and medical products.

Due diligence of local partners

Due diligence of partner implementing agencies, such as local non-governmental organisations or private contractors, is another important preventive measure. Due diligence should assess

the background and reputation of a partner, obtain their registration details and confirm their track record and ability to implement the planned programme with integrity. This information might be gathered by obtaining references and conducting desktop research.

The approach should be risk-based, with an agency conducting more in-depth due diligence for partners presenting higher risks. The UK Department for International Development (DFID 2013) Due Diligence Framework is one such example. DFID assesses its partners across four pillars: governance and control, an assessment of the partner’s risk management processes for bribery, corruption and fraud; ability to deliver, which encompasses past performance and staff capacity and capability; financial stability; and downstream partners, the quality of oversight where a partner is subcontracting elements of a programme.

Emergency preparedness

Emergency preparedness and special emergency measures can help to mitigate corruption risks accentuated by the need for rapid disbursement in humanitarian settings, especially if local capacity is underdeveloped. Of particular relevance to anti-corruption is surge capacity, the ability to scale up smoothly and quickly in response to an emergency (Transparency International 2014). This requires building up human resources capability as a priority so that additional staff can be rapidly deployed. A second example measure is to have in place a pre-approved supplier list, which allows suppliers to be quickly contracted in an emergency, having previously been appointed via a robust procurement process (Transparency International 2014).

Managing corruption risks in humanitarian settings

Overview

This section provides an overview of corruption risk management strategies for aid agencies while deployed in humanitarian settings. Corruption risk management flows from the risk identification and assessment process described in the previous section. It involves the application of project management methodologies to choose the right tools to mitigate any corruption risks identified (see Transparency International 2016 for a full Helpdesk answer of corruption risk management approaches in development assistance).

However, as discussed in Hart (2016), the approach of many aid agencies to corruption risk management lacks sophistication. Hart notes, for example, that there is scant evidence that aid agencies are conducting cost-benefit analysis in risk management, where the cost of minimising a risk through adding a control is weighed against the expected benefit of the activity. This may be due to gaps in expertise but may also stem from the absence of clearly defined objectives around corruption management with a strategy for achieving these goals.

The sections below summarise some of the most commonly recommended tools from the literature for managing corruption risk. The combinations of tools selected should be adapted according to the circumstances of the intervention and be subject to regular review.

Key tools

Monitoring and evaluation

Monitoring and evaluation (M&E) of aid programmes is critical to corruption risk

management. Assessments of corruption issues can be incorporated into an agency's broader M&E of humanitarian programmes.

The Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee Quality Standards for Development Evaluation (2010) are widely recognised standards that provide a benchmark and guidance on planning evaluations. As concerns corruption, monitoring efforts should seek to gather reports of potential corruption in the programme's operations, views on the effectiveness of controls in the areas of human resources and finance, as well as perceptions of the agency's integrity among stakeholders. Particular attention should be given to the make-up of the M&E team to ensure its members are in a position to ensure an objective assessment of the programme (Transparency International 2014).

There are various mechanisms through which affected communities can be brought into monitoring activities to improve accountability. These include stakeholder surveys, citizen or community scorecards, public hearings or, increasingly, ICT-based monitoring, allowing individuals to report problems or abuses and provide feedback on programmes remotely (see Transparency International 2013 for a full Helpdesk answer on community monitoring). M&E teams should ensure that the individuals consulted are representative of the communities affected, making additional effort to provide vulnerable groups, such as women and girls, with the possibility to provide feedback without fear of repercussions.

Auditing, investigations and sanctions

Regular audits, whether conducted internally, externally or by affected communities, can identify cases of missing resources while also serving as a

deterrent to corruption. The Transparency International Handbook on Preventing Corruption in Humanitarian Operations (2014) argues that “audits are often thought of as just financial checks, but an audit is any systematic review to ensure that your organisation is fulfilling its mission and safeguarding its resources”. The handbook recommends pursuing audits that go beyond simply the paper trail to build a full picture of the circumstances in which funds may have been diverted. Community-led audits require full access to project information to determine whether the resources expended have reached their intended beneficiaries.

A related tool, a Public Expenditure Tracking Survey (PETS), measures step by step the funds received under a programme and the outcomes delivered in terms of service (Transparency International 2013). These options require different levels of resources necessitating a cost-benefit analysis to determine what measure is likely to bring the best return on investment of time and funds.

Aid agencies should have clear investigation procedures to identify perpetrators and build a case of evidence against them. Dependent on the size of a programme, an agency may have specialist staff charged with leading investigations or may rely on external resources to provide an additional level of independence to investigations. The sanctions for employees or implementing partners found to be involved in corruption should be clearly laid out in internal policy documents.

Whistleblowing and complaints

Handling complaints is one of the six pillars of the HAP Standard in Accountability and Quality Management (2010). The requirements for organisations include defining and documenting a complaints procedure, which refers to a procedure

for investigating complaints and a response timeframe. The requirements further guarantee confidentiality and non-retaliation, specify appeal options and support for people who complain and any witnesses to support them. This is also an area where it is important to consider separate mechanisms for complaints of sexual exploitation. This might entail a separate reporting line managed by specially trained staff. The HAP standard also recommends a process for fast-tracking allegations of exploitation and abuse, including those of a sexual nature (HAP 2010).

For agency staff, a whistleblowing hotline can be established to allow the reporting of issues. This might be managed by an independent third-party and again the principles of confidentiality and non-retaliation should apply. The two example codes of conduct cited previously, published by AFD (2018) and GIZ (2017), both include processes for reporting concerns and whistleblower protection.

Inter-agency coordination

Collaboration between agencies working in the same humanitarian settings can reduce the potential for corruption created by duplication in emergency support. The Transparency International Handbook on Preventing Corruption in Humanitarian Operations (2014) recommends building a culture of sharing and cooperation, such as through cross-agency training; pre-planning a joint stance on external sources of corruption; coordinating funding requests and resource allocations; and sharing lessons learned and lists of debarred staff, partners and suppliers. One mechanism for coordinating this work is the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) Inter-Agency Standing Committees (IASC) whose cluster approach was first used following an earthquake in Pakistan (OCHA 2019).

There are some cases of good practice from Afghanistan and Somalia, where, for example, coordination bodies in Afghanistan have drafted common processes for partner and vendor due diligence. However, a recent Transparency International review of the topic notes that, in practice, corruption is rarely discussed at IASCs (Transparency International 2017). Inter-agency coordination is therefore a mechanism whose potential to manage corruption risks may not have been fully explored to date.

Evidence on which anti-corruption measures work

While there is now ready guidance available on recommended anti-corruption measures for aid agencies in humanitarian settings, there is an evidence gap in the literature concerning the effectiveness of these recommendations. Few studies systematically evaluate how well a particular measure has worked in mitigating corruption, the reasons for this or what combinations of measures might work best in a particular context.

This evidence gap is highlighted by Hart (2016), who notes that “even agencies that have embraced corruption risk management tools cannot yet cite evidence of effectiveness or impact. While some agencies report that more corruption analysis is being done and more staff are familiar with the issues, it is less clear whether corruption risk assessment and management tools are creating meaningful differences in how aid activities are designed and implemented. It will be hard to make the case for investing in even more nuanced risk management efforts if their impact cannot be proven.”

The findings of this Helpdesk literature review are also consistent with a review undertaken in 2012 of evidence gaps across the anti-corruption field.

While not specific to humanitarian assistance, it found a weak evidence base that donors’ internal processes contribute to reducing corruption, highlighting that there have been a low number of dedicated anti-corruption evaluations of donor programmes. The review found that donor evaluations generally focus on the overall effectiveness of projects rather than anti-corruption impacts specifically (Johnsøn, Taxell and Zaum 2012).

The research currently available on one form of humanitarian assistance which may be associated with lower corruption risks, direct cash transfers and cash-for-work programmes, illustrates this point. There is a logical theoretical argument that cash-based programmes may reduce corruption as it is possible to circumvent those areas of programming especially prone to corruption, namely procurement and the use of intermediaries. Where locally available systems permit, it is also easier to control cash distributions if these are tied to bank accounts or money transfer accounts (Transparency International 2016b).

However, with the exception of one study identified in Mexico – which found cash-programming contributed to a decline in administrative corruption in public welfare services (Grimes and Wängnerud 2009) – the potential of cash transfers as an anti-corruption tool does not appear to have been systematically tested. A background note published by the Overseas Development Institute on the state of evidence on humanitarian cash transfers found “no evidence of cash assistance being more or less prone to diversion than other forms of assistance” (Bailey and Harvey 2015). Findings from recent individual case studies in Afghanistan and Lebanon reported different findings on how vulnerable cash transfers had been to corruption (Transparency International 2017).

Although, as the following section will outline, there are a growing number of case studies on corruption in humanitarian assistance, the predominant focus is on the difficulties and risks in these settings. Aid agencies need to invest more resources in generating evidence around the effectiveness of measures and make the findings publicly available. This ties into the importance of greater openness in the sector around the challenges of managing corruption issues.

Examples of lessons learned from humanitarian crises

Overview

There are several sets of case studies available in the literature that provide valuable resources on lessons learned on corruption in humanitarian crises. Some of the most detailed include case studies from Afghanistan, Guinea, Lebanon and Somalia published recently by the Transparency International-led Collective Resolution to Enhance Accountability and Transparency in Emergencies (CREATE) initiative (Transparency International 2017).

Other recent studies with substantive coverage of corruption issues include a research report based on fieldwork in Afghanistan, Somalia, South Sudan and Syria published under the Secure Access in Volatile Environments (SAVE) research programme (Haver and Carter 2016); a study on remote partnerships based on case studies in Syria and Iraqi Kurdistan published by the Feinstein International Center (2015); and an academic paper on the meanings of corruption and humanitarianism based on fieldwork with Palestinian refugees (Feldman 2018).

Some of the first research on this topic published by the ODI was also based on case studies in

Afghanistan, Liberia, Sri Lanka and Uganda (ODI 2007–2008).

Based on this collection, the rest of this section provides short summaries of three case studies which cover humanitarian assistance to refugees, the area most relevant to the agency which requested this review.

Operations to assist Syrian refugees and affected host communities in Lebanon

The TI Lebanon case study illustrates the challenges of delivering assistance in a highly fragile environment characterised by weak governance (Transparency International 2017a). The study found a need for more comprehensive risk assessments of the environment to enable aid agencies to design better programmes adapted to the prevalent corruption issues. Donor agencies and international organisations that had subcontracted operations to private companies or channelled funds through public institutions were more exposed to corruption risk due to a lack of transparency around how funds were managed. This encouraged agencies to work with national civil society organisations, although the report calls for these partnerships to be made more transparent and “designed in a way that does not further expose them to corruption or misuse of funds”. Despite positive dialogue around the development of an accountability framework between aid agencies and other actors, the Lebanon Crisis Response Plan, the case study finds only limited open discussion of corruption issues among aid agencies.

On corruption mitigation measures, the study shows that social media and new technologies have improved communication with affected communities by offering an alternative mechanism for whistleblowing and complaints. It further shows that in this context the move towards cash-based operations for food aid, non-food items and

multi-purpose cash programmes has reduced corruption risk by providing aid directly to beneficiaries rather than through multiple subcontractors. However, ongoing problems around corruption in procurement, conflicts of interest, petty bribery and favouritism are all highlighted as significant operational problems for humanitarian actors.

Maslakh camp case study, Afghanistan

Although the study dates from 2007, the ODI analysis of corruption in Maslakh camp in Afghanistan provides insights into corruption in humanitarian camp settings (ODI 2007). In this case, the camp was for internally displaced persons (IDPs), but the lessons also have applicability to refugee camps. The study maps some of the common corruption risks in IDP and refugee camps, including in the registration of beneficiaries, procurement of goods for the camp and the management of incentives for displaced groups to be repatriated.

In addition, the case study highlights how camp governance systems can underpin corrupt activities and be one of the main catalysts for diversion of aid. In this case, the Taliban armed group were able to control the camp governance structure for their own purposes. One of the key lessons from the study is therefore to form a full understanding of the power structures that are set up with internal and often informal camp management systems and consider how agencies can interact with these structures to ensure the equitable distribution of aid. The study also called for better use of technology, such as biometric data, to reduce fraud at the beneficiary identification and registration stages of programmes.

Lessons from SAVE case studies

Based on research conducted from 2013 to 2016 in four countries affected by high levels of insecurity – Afghanistan, South Central Somalia, South Sudan and Syria – the SAVE report reviews the practices of a wide range of humanitarian agencies and organisations (Haver and Carter 2016). Among the key lessons emphasised in the report are the importance of organisational culture, with the most effective agencies found to have “a strong internal triage culture” between the country and global level to reach hard to access areas. The report adds that “organisational ethos is particularly effective when combined with a rich understanding of the given political environment, including possible pressures from political actors on the ground or in donor capitals, and flexible funding”. It recommends that agencies therefore take the time to map out and understand power dynamics in humanitarian settings.

The report discusses the problem of agencies paying for access to remote areas. It finds that local-level staff are most frequently faced with this form of ethical dilemma but “receive insufficient support due to a culture of silence on these issues”. It argues that “zero tolerance” policies on corruption can negatively affect an agency’s ability to gain access as they inhibit discussion of corruption. The report consequently calls for additional policy guidance, support and training on negotiations for the local staff. It recommends agencies “select and develop national staff with relevant personal networks and integrity, and empower them to perform in senior positions at a high level of quality by providing regular, sustained support and by monitoring to prevent corruption”.

References

- Agence Française de Développement. 2018. *AFD Group Anti-Corruption Code of Conduct*.
- Bailey and Harvey. 2015. *State of Evidence on Humanitarian Cash Transfers*.
- Care International. 2017. *Policy on Protection from Sexual Exploitation and Abuse and Child Protection*.
- Department for International Development. 2013. *Due Diligence Framework*.
- De Simone and Taxell. 2014. Donors and "Zero Tolerance for Corruption": From Principle to Practice.
- European Commission Directorate-General for Humanitarian Aid and Civil Protection (ECHO). 2011. *Humanitarian Aid Guidelines for Procurement*.
- Ernst & Young. 2015. *Improving Internal Controls: The EY Guide for Humanitarian Aid Organisations*.
- Feldman. 2018. *Care and Suspicion. Corruption as Definition in Humanitarian Relations*. Current Anthropology. Vol. 59, Supplement 18,
- Fernstein International Center. 2015. *Breaking the Hourglass: Partnerships in Remote Management Settings – The Cases of Syria and Iraqi Kurdistan*.
- Gesellschaft für Internationale Zusammenarbeit. 2017. *A Gender Perspective on Corruption Encountered During Force and Irregular Migration*.
- Gesellschaft für Internationale Zusammenarbeit. *Code of Conduct – Basic Principles*.
- Grimes and Wängnerud. 2009. *Curbing Corruption through Social Welfare Program? The Effects of Mexico's Conditional Cash Transfer Program on Good Government*.
- The Guardian. 2016. *It's Time to Talk about Fraud in Aid Agencies*.
- Hart. 2016. *Why is Corruption Risk Management So Hard? Assessing Current Practices in Development Aid*.
- Haver and Carter. 2016. *What it Takes: Principled Pragmatism to Enable Access and Quality Humanitarian Aid in Insecure Environments*.
- Humanitarian Accountability Partnership. 2010. *The 2010 HAP Standard in Accountability and Quality Management*.
- Johnsøn. 2015. *The Basics of Corruption Risk Management. A Framework for Decision-Making and Integration into the Project Cycles*.
- Johnsøn, Taxell and Zaum. 2012. *Mapping Evidence Gaps in Anti-Corruption. Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption*.
- Keen. 2008. "Aid" (Chapter Six) in *Complex Emergencies*. Cambridge: Polity Press
- OECD Development Assistance Committee. 2010. *Quality Standards for Development Evaluation*.
- Overseas Development Institute and Management Accounting for NGOs. 2006. *Mapping the Risks of Corruption in Humanitarian Action*.
- Overseas Development Institute. 2007. *Corruption Perceptions and Risks in Humanitarian Assistance: an Afghanistan Case Study*.
- Overseas Development Institute. 2007 a. *Corruption Perceptions and Risks in Humanitarian Assistance: A Liberia Case Study*.
- Overseas Development Institute. 2008. *Beneficiary Perceptions of Corruption in Humanitarian Assistance: a Sri Lanka Case Study*.
- Overseas Development Institute. 2008 a. *Perceptions of Corruption in Humanitarian Assistance Among Internally Displaced Persons in Northern Uganda*.
- Oxfam. 2018. *Protection from Sexual Exploitation and Abuse Policy*.
- Relief Web. 2015. *Evidence on Corruption and Humanitarian Aid*.
- SAVE. 2016. *Listening to Communities in Insecure Environments*.

Transparency International, Feinstein International Center, Humanitarian Policy Group. 2008. *Preventing Corruption in Humanitarian Assistance*.

Transparency International. 2009. *Gender and Corruption in Humanitarian Assistance*.

Transparency International. 2013. *Community Monitoring of Humanitarian Aid and Service Delivery*.

Transparency International. 2014. *Preventing Corruption in Humanitarian Operations*.

Transparency International. 2016. *Overview of Corruption Risk Management Approaches and Key Vulnerabilities in Development Assistance*.

Transparency International. 2016 a. *Gender and Corruption Topic Guide*.

Transparency International. 2016 b. *Corruption Risks in Cash for Work Programmes*.

Transparency International. 2017. *Collective Resolution to Enhance Accountability and Transparency in Emergencies: Synthesis Report*.

Transparency International. 2017 a. *Collective Resolution to Enhance Accountability and Transparency in Emergencies: Lebanon Report*.

United Nations Office for the Coordination of Humanitarian Affairs. 2019. *Webpage on Overview of Cluster Approaches*. (accessed 3 February 2019)

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Partner agencies

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