

# RISKS AND SAFEGUARDING STRATEGIES IN MULTI-PURPOSE CASH ASSISTANCE (MPCA) PROGRAMMING

Lessons from VenEsperanza, Latin America's  
largest cash consortium

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# Introduction

## Case study

### The VenEsperanza Consortium's MPCA program in Colombia

This report presents the VenEsperanza Consortium's multi-purpose cash assistance (MPCA) program as a case study to illustrate lessons learned and best practices in safeguarding MPCA participants against potential risks. The VenEsperanza Consortium is the largest cash consortium in Latin America, representing four international organizations: the International Rescue Committee (IRC), Mercy Corps, Save the Children, and World Vision. Since October 2019, VenEsperanza has provided emergency assistance to over 400,000 highly vulnerable people affected by the Venezuelan crisis. The program, funded by the Bureau for Humanitarian Assistance (BHA) of the U.S. Government's Agency for International Development (USAID), has served Venezuelan refugees and migrants, Colombian returnees, and host community members in twelve Colombian departments (see right) through unconditional MPCA. Provided over a maximum of six months, the assistance supports the most vulnerable people affected by the crisis by helping them to meet their basic needs and improve the living conditions and nutrition of their families.



### The five phases of VenEsperanza MPCA programming

This section provides an overview of each of VenEsperanza's five phases of MPCA: scoping, screening, selection, delivery, and withdrawal.

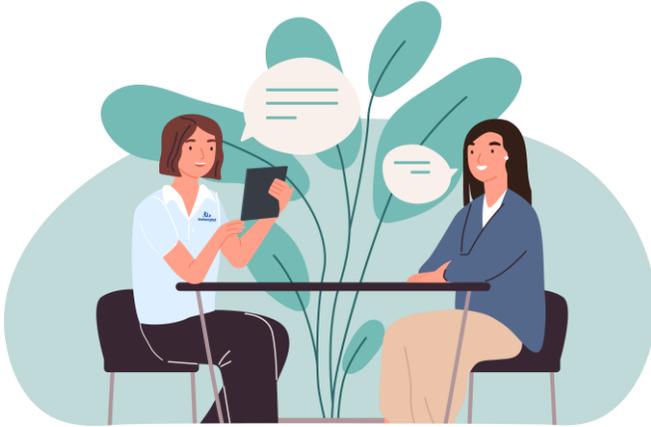
#### Scoping: identifying potential participants

The VenEsperanza consortium identifies potential participants through both direct and indirect methods. Direct methods include identification of potential participants by VenEsperanza program staff in the field, direct referrals of field personnel working in complementary programs, and active search of participants through community scoping and census exercises as well as through the registration of new arrivals along common migratory routes. Potential participants are also identified indirectly through referrals shared by community members including official and unofficial leaders, local authorities, and local service



providers including NGOs, municipal social service agencies, United Nations agencies, and informal/formal support groups. VenEsperanza team members are in regular contact with these actors to receive and verify referrals. The consortium has also conducted a pilot wherein potential participants themselves could fill out a self-application form through a website and WhatsApp bot to be considered for the program. However, the administrative burden of the pilot was unsustainable, in large part due to the large pool of ineligible applicants, so alternatives continue to be explored.

## Screening: surveying potential participants



During the screening phase, potential participants complete an eligibility survey. VenEsperanza's participant selection process is determined by eligibility criteria centered on vulnerability, developed through econometric analysis based on a proxy means test model, to ensure that assistance is directed to those most in need of humanitarian assistance. These criteria are automatically programmed in CommCare, VenEsperanza's data platform, and are unknown to field staff in order to mitigate fraud risk. All VenEsperanza

teams have sub-teams of surveyors who are trained in CommCare and survey implementation. During the COVID-19 pandemic, surveys were primarily conducted over the phone but have gradually shifted back to in-person as pandemic-related restrictions have lessened.

## Selection: enrolling selected participants

Once surveys are submitted, CommCare automatically selects those that meet targeted eligibility criteria. De-duplication and verification processes are then conducted separately, by different VenEsperanza personnel in accordance with the consortium's protocols and procedures, to ensure transparency and reduce risks. Approved participants are assigned to a cash transfer modality, based largely on accessibility of services in their specific geographic area, and informed of their enrollment into the program by a VenEsperanza staff member, typically via a phone call.



## Delivery: transferring cash to participants

In this stage, MPCA is transferred to participants. Prior to the transfer, participants learn when, where, and how to access funds once transferred. They also receive information about potential risks and recommendations to safeguard against those risks. Participants are also informed about communication channels so they can contact the VenEsperanza team to ask questions, raise concerns or complaints, provide feedback or suggestions, or report cases of exploitation or abuse. This phase differs slightly depending on the modality of transfer, as outlined below.



## Cash cards

Once cash card recipients are informed of and accept their enrollment into the program, they are invited to attend an event to learn more about the program and to receive their cards. During the event, VenEsperanza staff give an informational talk, lasting about 45 minutes, to explain everything that participants need to know about using their card. The talk, typically conducted in groups, includes step-

by-step simulations for ATM withdrawals and debit purchases to assist the participants who are not familiar with using an ATM. VenEsperanza staff provide participants with instructions and advice on how to avoid bank ATM charges and how to protect themselves against potential risks. Participants also learn to check their card's balance on an online portal through Grupo Aval<sup>1</sup>, the banking group housing the account associated with their cash card (no need for them to have a prior personal account). During the event, participants meet individually and privately with a member of the VenEsperanza team, who explains the amount of cash the participant will receive and provides the participant with his/her cash card and pin.

## Payments through Efecty

The other transfer modality is receiving cash at a physical point operated by the company Efecty<sup>2</sup>. Once Efecty recipients are informed of and accept their enrollment into the program, they are registered by VenEsperanza staff for an account with Efecty and are provided with key information about how and when their cash will be transferred and how to access it. VenEsperanza staff give a talk, lasting five to ten minutes, to provide information to participants about the steps involved and to give them important tips and recommendations on safety and security. Participants are also privately told the amount that they will receive. VenEsperanza staff either provide this information over the phone (during the COVID-19 pandemic) or invite the participant to an in-person event (following a return to presential work).

## Withdrawal: participants access transferred cash

In this stage, participants access the cash that has been transferred. Differences by modality are outlined below.

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<sup>1</sup> Grupo Aval is Colombia's largest banking group with four affiliated banks: Banco de Bogotá, Banco de Occidente, Banco Popular and Banco AV Villas. The four banks combined make up a network of more than 1,200 branches, over 3,300 ATMs, and over 36,000 banking correspondents and other points of service. <https://www.grupoaval.com/grupo-aval-eng> (Accessed August 1, 2022)

<sup>2</sup> Efecty is a Colombian cash transfer service operator with over 9,000 service points nationwide. <https://www.efecty.com.co/web/> (Accessed August 1, 2022)

## Cash cards

Cash card recipients have two options to access their funds. They can go to an ATM or service point (preferably one affiliated with their bank card to avoid commission fees) and withdraw cash directly from their account. Alternatively, participants can use their card to purchase items directly at a store, paying with debit.



## Payments through Efecty

Participants receiving payment through Efecty must make their way to an Efecty service point (Efecty site or franchise site) to withdraw funds. There, they are attended by an Efecty agent and need to present the ID associated with their account and provide their fingerprint to confirm their identity. Once confirmed, the Efecty attendant provides the participant the full amount transferred.



# Report overview

## Purpose

This research aimed to collect, analyze, and document potential risks to MPCA participants and to harvest lessons learned and best practices in risk safeguarding and mitigation. This research is part of the VenEsperanza Consortium's wider research and learning initiative. By prioritizing greater evidence generation and analysis on issues related to the provision of MPCA in emergencies, this work aims to benefit humanitarian agencies and cash actors and to help inform strategic decision-making for future cash work in Colombia and beyond.

## Report structure

This report is an account of VenEsperanza's cash transfer program in Colombia and lessons learned to date. The first section explores the two modalities of cash transfer and the advantages and disadvantages of each. The following section presents prominent potential risks and safeguarding strategies, including lessons learned and best practices. This report concludes with considerations for event planning, communication of key messages and fraud detection and response. An annex includes further resources.

## Intended audience

This guidance is intended for (1) internal VenEsperanza stakeholders, so that lessons learned serve to inform future programming and (2) external stakeholders delivering MPCA, so that lessons learned from VenEsperanza allow for adoption of best practices and avoidance of mistake repetition.

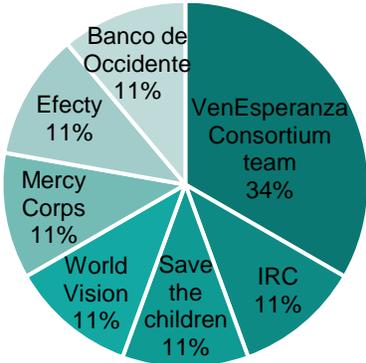
# Methods

## Data sources and collection methods

This research draws on a combination of primary qualitative data collection (key informant interviews and focus group discussions) and secondary document review (internal and public files and reports).

Semi-structured key informant interviews were conducted remotely and in-person with selected VenEsperanza members at various operational levels as well as key external stakeholders. Key informant interview samples were drawn using purposeful sampling following discussions with VenEsperanza leadership, who provided lists and contact information for targeted profiles. Ultimately, profiles included present members of the VenEsperanza Consortium management and coordination team, program and/or protection managers from each partner organization, and focal points for the service providers issuing e-payments (Efecy) and cash cards (Banco de Occidente, Grupo Aval). Of the ten key informants invited to participate, nine accepted the invitation, provided informed consent, and were interviewed in their preferred language of English or Spanish. Interviews lasted no more than one hour and took place in May and June 2022.

Key informants by affiliation



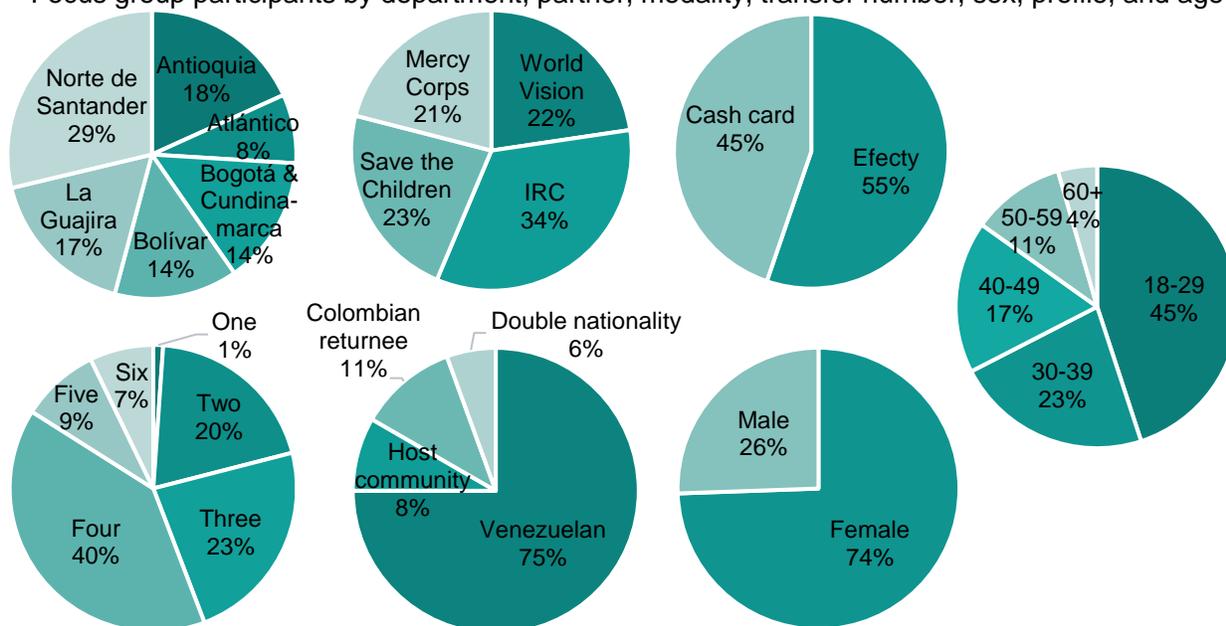
Focus group discussions were conducted in person with participants of VenEsperanza assistance, employing a semi-structured format to elicit participants’ views. Focus group samples with program participants were drawn from partner organization’s participant lists within selected sites in six Colombian departments, representing those with the greatest number of VenEsperanza MPCA participants to date, with the exception of Arauca, which was removed from consideration due to security concerns related to the national presidential election cycle. The departments selected were Antioquia, Atlántico, Bogotá (capital district) & Cundinamarca, Bolívar, La Guajira, and Norte de Santander. Specific sites within those departments were selected based on feasibility discussions with the VenEsperanza Consortium team and partners. Whenever possible, both urban centers and more remote sites were included to provide comparative contexts.

Focus group participants by department, modality, and site

Organization	Modality	Department						TOTAL
		Antioquia	Atlántico	Bogotá & Cundinamarca	Bolívar	La Guajira	Norte de Santander	
Mercy Corps	Cash card	13			25			38
IRC	Cash card	9		8			9	26
	Efecy	11		8			16	35
World Vision	Cash card		6				13	19
	Efecy		8				14	22
Save the Children	Efecy			10		31		41
<b>Total Cash card</b>		<b>22</b>	<b>6</b>	<b>8</b>	<b>25</b>	<b>-</b>	<b>22</b>	<b>83</b>
<b>Total Efecy</b>		<b>11</b>	<b>8</b>	<b>18</b>	<b>-</b>	<b>31</b>	<b>30</b>	<b>98</b>
<b>TOTAL</b>		<b>33</b>	<b>14</b>	<b>26</b>	<b>25</b>	<b>31</b>	<b>52</b>	<b>181</b>

Participants were selected for focus group discussions based on non-probabilistic, purposive sampling by location, partner organization, and modality (Efecty or cash card) and aimed to reflect a sampling frame with maximum diversity desired across four categories: age, gender, participant profile (Venezuelan refugee or migrant, Colombian returnee, or host community member), and number of transfers received. Twenty-nine focus groups, comprised of 181 participants total, were conducted in May and June 2022. Recruitment procedures aimed to be impartial to ensure broad representation and avoid potential biases. Special consideration was given to Age, Gender, and Diversity (AGD) perspectives in all primary data collection activities carried out for this research. Notably, female and Venezuelan participants represent a larger proportion of the sample as they represent a larger proportion of VenEsperanza MPCA participants<sup>3</sup>.

Focus group participants by department, partner, modality, transfer number, sex, profile, and age



## Data analysis and synthesis

Using an inductive and deductive approach to data analysis, all key informant interview transcripts and focus group notes were categorically organized and ‘open coded’ in Dedoose to identify and label all segments of data perceived relevant to central research questions. Codes were grouped by tallying conceptually equivalent themes and analyzed for response patterns and trends. Secondary data was analyzed and triangulated with primary data to minimize bias, enhance accuracy and reliability of results, and ensure the credibility of findings, with each directly traceable to evidence.

## Findings

Research findings are organized into three sub-sections. The first section presents advantages and disadvantages of each MPCA modality. The second details some of the most prominent potential risks associated with MPCA as well as risk mitigation strategies and best practices. The final section explores event planning, communication and key messages, and fraud mitigation and response.

<sup>3</sup> Of 5,905 participants who took post distribution monitoring surveys in February 2022, 87% were female & 73% were Venezuelan.

## Advantages and disadvantages of each MPCA modality

The following table lists modality advantages and disadvantages as described by key informants and/or focus group participants (see key).

### Efecty advantages

- Participants are registered with their ID and fingerprint, which is verified before every transaction so only the intended participant can withdraw from their account.
- Many participants are familiar with and/or have prior experience using Efecty
- Efecty has nationwide coverage and thousands of sites, often close to residences and workplaces
- Participants are provided the full amount of their transfer at once
- There are not fees incurred by participants
  - Efecty is easy to learn compared to cash cards and the informational talk is shorter
  - No one besides the attendant knows whether the participant is making a deposit, transfer, or withdrawal
  - Since Efecty also allows for transfers and deposits, participants can make payments (e.g., rent, utilities) while withdrawing
  - Efecty rarely has long lines or wait times and withdrawals are fast, taking a matter of minutes

### Efecty disadvantages

- Requires intermediaries (Efecty attendants), introducing subjectivity and potential risk of discrimination or xenophobia, mistreatment or abuse of participant or participants' data, extortion or exploitation (e.g., charging for services, like photocopies of ID), poor or improper protocol adherence (e.g., not verifying ID), refusal to disperse the participants' funds, or intentional or mistaken dispersal of the incorrect amount
- Requires additional processing for those without valid documentation (or a fingerprint<sup>4</sup>)
- An Efecty site may not have sufficient funds to disperse to a participant
- An Efecty site may be closed when a participant arrives
- An Efecty may not be close to where participants live
- Since Efecty operates both Efecty points and franchise points, not all sites are managed the same way and not all information reaches all sites, resulting in differing experiences for participants in different sites
- If a participant's ID is lost or stolen, he/she cannot access funds until/unless replaced
- Participants may be robbed after withdrawing their cash
  - Participants may arrive and Efecty's system is down
  - There is a 30-day limit to withdraw from an Efecty account before funds are blocked
  - Fraud allegations must pass through Efecty's lengthy internal investigation processes, and it can take months to reach a verdict and take action (e.g., reimbursement)
  - Requires close physical contact with an attendant, a risk during the pandemic
    - A registration error can prevent participants from accessing their account/funds
    - Participants sign before receiving cash in hand, a protocol that makes them nervous
    - Since ID verification allows only the intended participant to withdraw (an advantage in terms of preventing fraud), participants did consider this a limitation for those (e.g., sick, injured, disabled) who may benefit from someone withdrawing on their behalf

<sup>4</sup> Fingerprints can be worn down or erased for several reasons, including but not limited to: manual activities causing mechanical abrasion, certain skin conditions, medical treatments, etc.

## Cash card advantages

- Cash cards are an option for those without required documentation (or a fingerprint)
- Participants can withdraw up to five times from any affiliate ATM without incurring commission charges
- Allows participants to make multiple withdrawals if desired (up to a limit without fees)
- Participants have the option to withdraw cash at an ATM or purchase goods directly through debit
- Participants can review their balance through an online platform or phone call
- Cash cards are secure with a unique ID and pin
- If a card is lost or stolen, participants can contact VenEsperanza and fill out a form to receive a new card with remaining funds
- Longer withdrawal time-limit. Funds remain available for the duration of the program
- Cards can be used anywhere in the world
- There is no human contact involved with ATM withdrawals, a benefit during the pandemic
- Participants can lend their card and pin to a trusted person to withdraw on their behalf if unable to do so themselves (e.g., if sick, injured, disabled, etc.)
- There are usually ATMs or other service points close to participants
- ATMs rarely have long lines or wait times and the withdrawal is fast, taking a matter of minutes

## Cash card disadvantages

- Banks charge a commission if participants withdraw from a non-affiliate ATM
- Banks charge fees if participants exceed monthly withdrawal limit
- Participants can only withdraw in multiples of \$10,000 or \$20,000 COP so participants must often leave a part of their money in the bank, necessitating a direct “debit” purchase to access what remains
- A lost, damaged, or stolen card must be replaced and can take time during which a participant will not have access to funds. Any stolen funds can’t be replaced (if the thief has the pin, funds can be stolen through withdrawal. If the thief does not have the pin, funds can be stolen if used as a debit card in certain instances)
- Participants may forget their pin (especially because they do not set it themselves) and will not have access to funds until they reclaim it
- Not all participants have knowledge/experience using cards and/or ATMs and for some, there may be a learning curve to learn how to use it
- The cash card informational talk is long (averaging 45 minutes) owing to how much information must be provided
- ATMs may be out of service or without funds available, limiting access to funds if there are not other ATMs nearby
- ATMs may malfunction and not return the card and/or disperse funds
- Participants can be robbed after withdrawing their cash
- There is no guarantee that the person withdrawing funds is the intended participant
- Participants may lend their card and pin to someone to withdraw on their behalf only to have that person steal the money
- Some ATMs ask users whether they would like to make a charitable donation, which participants may feel pressured to do, may not know how to avoid, or may mistakenly agree to

### KEY

- mentioned by both key informants and participants
- mentioned only by key informants
- mentioned only by focus group participants

## Potential risks and safeguarding strategies

This section details some of the most prominent potential risks associated with MPCA (and what phase they might present in) as well as risk mitigation and safeguarding strategies and best practices. Risks are generally presented in the order that they may appear, from scoping through to withdrawal. Those risks that are cross-cutting and span all five phases are presented last.

### Exploitation of participants by third-party intermediaries (SCOPING)

During scoping, key informants identified the risk of exploitation of (potential) participants by third-party intermediaries (community members or leaders, organizations or institutions that make referrals, etc.), which can take on a number of forms. First, intermediaries may engage in kickback solicitations, requests in the form of payment or favors, for referring potential participants to the program, which may or may not actually happen. Kickbacks may be requested upfront (in exchange for the promise of a referral) or after the benefit is received (as a sort of “tax” for having been successfully referred and enrolled). Intermediaries may also solicit and/or misuse a (potential) participant’s personal information, identification, or data or may misconstrue information about the program for personal gain. A real time evaluation (RTE) of VenEsperanza conducted in April 2021, for instance, found evidence to suggest that some households received fraudulent calls from individuals posing as implementing agencies and asking for personal information, generating distrust between communities and VenEsperanza. Furthermore, the RTE found that participants were willing to give information to any organization who might help them, prioritizing potential assistance over concerns for their personal information. Other examples of exploitation shared by key informants include political candidates who might falsely affiliate the program with political parties or agendas to gain favor or votes in local elections. Similarly, community leaders might claim to have brought the program to the community or to have made referrals in hopes of gaining leadership favor, votes, or approval. Several reported that leaders can also exploit (potential) participants or spread false or misleading information about the program, which may hurt its reputation and generate mistrust.

**“Some participants may deal with intermediaries who don't really exist, who not only ask for kickbacks but don't actually refer them.”**  
— Key informant

**“We find there are some local and also religious organizations that charge a fee. We find people having to pay money to get on lists, return favors, those kinds of things. There are strings attached. That's inevitable when you're doing cash and it's a risk to participants.”**  
— Key informant

**“An important risk is the intervention of third parties. We don't know their intentions when referring people to us. Some sources may say, ‘I'll refer you, I'll put you on this list, but when you receive the transfer, give me part of what you receive.’ So, we need to look at who these third parties are and to what extent we as a program can verify their reliability.”**  
— Key informant

Focus group findings reveal that participants came to enter the program through a variety of different channels, many of which involved third party intermediaries. In certain communities, particularly those characterized by more informal settlements, all or nearly all focus group participants had been identified directly by VenEsperanza scoping activities, wherein staff conducted a community visit or door-to-door visits. Often, in these sites, a community leader facilitated contact between the VenEsperanza team and potential participants. The majority of focus group participants in these communities felt that leaders are trustworthy and play an important role in the scoping phase and beyond (only in one site did participants reference a corrupt and unscrupulous leader in a neighboring community), with many expressing that leaders deserved to receive some benefit for their time and effort. Another common way participants entered the program was through internal referrals from other VenEsperanza partner programs or external referrals from state institutions, national and local NGOs, health service providers, churches, etc., especially during the pandemic, when in-person pre-registration of participants by team members was not possible. Other participants found out about the program through family, friends, neighbors, or other acquaintances (most of whom were participants themselves). A small minority of participants had initiated contact with VenEsperanza after coming across the program’s social media or web pages.

While many participants’ involvement in the program involved third party intermediaries, findings indicate very few cases of exploitation. Kickback solicitations (made by a community leader and by a person falsely posing as an aid worker) were only reported in two of the 29 focus groups and in neither case directly affected participants but rather, people they knew. In post-distribution monitoring surveys, conducted with 11,691 participants between May 2021 and August 2022, less than 1% of participants reported having paid or done a favor to be included in the program.

## **Risk mitigation and safeguarding**

During scoping, key informants expressed that an important mitigation and safeguarding strategy is diversifying referral lists as much as possible to avoid reliance on specific sources. This, informants reported, should be paired with communication and relationship building with referral sources as well as sensitization activities that define and denounce fraud, explain and enforce neutrality and independence, and highlight protection. Written agreements with referral partners should be pursued, when possible, to establish expectations, responsibilities, and commitments towards key principles and standards for engagement. Informants also recommend cash programs carefully consider potential rewards or compensation for trustworthy community leaders who dedicate considerable time and resources to the program. Equally important, they caution, is deciding not to work with leaders who can’t support healthy functioning of the program.

### **Best practices for mitigating exploitation of participants by third party intermediaries:**

- Diversify referral lists as much as possible.
- Communicate expectations, standards, and zero fraud policy to referral sources and seek written agreements on engagement when possible.
- Carefully consider potential rewards systems for trustworthy community leaders and consequences for untrustworthy ones.
- Develop anti-fraud messaging campaigns targeted towards participants (see “Communication and key messages” section for examples).
- Develop robust CARM channels, verification exercises, and post-monitoring surveys to identify, investigate and respond to allegations (see “Fraud mitigation and management” section for more information).

Another key strategy mentioned by key informants includes targeted messaging to participants, stressing that assistance is free, cautioning them against solicitations from third party actors, and requesting they report any exploitation through Community Accountability Response Mechanisms (CARM). CARM, explained in greater detail later on, allows participants and community members to report any cases of exploitation, abuse, or coercion to the VenEsperanza team so they can take appropriate action. Verification exercises and post-monitoring survey questions can help to further understand and mitigate exploitation risks and are thus considered to be a best practice as well.

## **Generation of individual and community-level expectations (SCOPING, SCREENING)**

According to key informants, another risk present during both scoping and screening is the generation of expectations at the community and/or individual level. They describe how the mere presence of a humanitarian organization in a community during scoping exercises can generate expectations or assumptions of future assistance among the community, especially if that organization is recognized or known for cash programming. However, for any number of reasons, an organization may ultimately decide not to work in the community (e.g., because there aren't enough potential participants, because of insecurity, etc.). Even if the organization does ultimately work in the community, it most likely won't serve the community as a whole since assistance is targeted to serve only the most vulnerable. In either event, organizations may not be able to meet community-level expectations. At the individual level, key informants explain that potential participants who are being screened might develop false hope or come to expect assistance if they are not made explicitly aware or don't understand that the survey doesn't guarantee enrollment into the program.

*“One complex issue is word of mouth in communities. For example, we did an exercise one day and word began to spread. When our team finished that day and arrived at the central square, there were several people waiting for attention that they expected us to give... but that was never the case and generated frustration. We had to meet with local authorities and explain that we had never summoned them, but rather that some found out and spread the word. So, it's risk because the community thinks we're providing attention when really, we're just [scoping].”*

— Key informant

*“I think any multipurpose cash program automatically generates a lot of expectation at the community level... there tends to be the expectation that every family will receive cash in a community.”*

— Key informant

*“I think as the program gets bigger and an organization is enrolling more people, it attracts more attention in communities too. That, for me, has been one of the bigger risks.”*

— Key informant

The expectation and anticipation generated by the survey is evidenced in focus group discussions with participants. After taking the survey, many participants remembered being attached to their

phones, anxious and afraid to miss a call from VenEsperanza. Participants expressed feelings of elation, relief, hope and gratitude when describing the moment they found out they were selected.



*“After the survey, I carried my phone with me, even to the bathroom, so I wouldn’t miss a call.”*

— Focus group participant in Cúcuta, Norte de Santander

## Risk mitigation and safeguarding

At the community level, key informants considered it important to use discretion (e.g., avoiding large events, not talking with prospective participants specifically about cash assistance until the distribution event, etc.) when present in a community so as not to attract undue attention and generate expectations that the organization is not able to be met. Transparent and clear communication with trusted community actors may also help avoid the spreading of misinformation and/or expectations, explained key informants.

### Best practices for managing community and individual level expectations:

- Use discretion when in communities to avoid generating undue attention and/or expectations.
- Clearly and repeatedly explain the selection process and that one’s participation in scoping and screening procedures does not guarantee enrollment into the program.

At the individual level, key informants expressed that all surveyors should be trained on protocols around expectation management and transparency during the scoping and screening processes. VenEsperanza uses scripts to explain at multiple moments that participation in registration or the survey doesn’t guarantee selection into the program (see Annex B). Focus group participants recalled VenEsperanza’s clarity and transparency about these processes, generally regarding it a good practice in managing expectations.



*“It must be made clear to them that taking the survey does not mean they will be a participant. An initial awareness-raising exercise must be carried out so they know it does not assure that they will receive humanitarian assistance, taking care to mitigate expectations that can be generated by filling out the survey.”*

— Key informant

*“In terms of community expectations, I think the key is mitigation from the get-go. When you do that kickoff, before you even do eligibility interviews, making it very clear that these are limited resources and there are clear criteria.”*

— Key informant

## Program staff empathy desensitization (SCOPING, SCREENING)

A personnel-related risk cited by key informants is empathy desensitization, which can occur if staff empathy towards participants is either not well grounded in the first place or not reinforced/nurtured over time. Informants recognized that the very nature of humanitarian work, especially at the field level and especially if workloads are heavy, can take an emotional toll on staff over time and lead to “empathy burnout” or “compassion fatigue”. The risk if staff become desensitized, is that they may become emotionally withdrawn or detached or exhibit less empathy when working with participants.

*“There’s a risk when staff who apply the instruments do not have sufficient capacity or empathy. We’ve increased efforts to ensure our surveyors understand the tool and the importance of neutrality and objectivity, etc. but for me, there’s a psychosocial risk for the survey team. Listening seven, eight, nine times a day to all the difficulties that our participant households may have triggers distress for surveyors, which may affect their empathy towards participants over time.”*

— Key Informant

Focus group participants only had positive things to say about how they were treated by VenEsperanza staff, with many recognizing and praising staff for being respectful, patient, and kind. Participants frequently mentioned that staff “took them into account” and “really listened”.

### Risk mitigation and safeguarding

To safeguard against the potential risk of empathy desensitization, informants felt cash programs should consider identifying empathetic candidates in hiring processes and reinforce empathy through trainings (an identified priority for VenEsperanza). Key informants also advocated for cash programs to (1) ensure staff access to care and psychosocial support services, and (2) establish a healthy work culture with realistic targets and manageable workloads and schedules.

#### Best practices to develop and maintain staff empathy:

- Identify and hire empathetic and compassionate candidates for field work positions in contact with (potential) participants.
- Cultivate and nurture empathy through trainings.
- Prioritize staff care by building a healthy work culture and ensuring staff - especially those on the front lines- have access to psychosocial support services.

### Survey participant distrust, discomfort, or distress (SCREENING)

Another risk during the screening phase, as evidenced by key informant interviews and focus group discussions with participants, is participant distrust of the survey or discomfort or distress during the survey, which can take on different forms. Key informants, for example, spoke to the potential risk of distrust or discomfort generated by either real or perceived pressure to take the survey, which can arise if the survey is not presented to or perceived by potential participants as voluntary in nature or if consent procedures are not properly followed by surveyors or understood by participants. Similarly, key informants considered that survey participants might experience distrust or discomfort if confidentiality or anonymity are not properly explained or understood. This potential risk was not raised in focus group discussions.

Another potential source of participant discomfort, as cited by key informants and participants alike, is the length of the survey. Indeed, participants’ most common complaint about the survey itself was that it was long and time-consuming. Key informants also felt the survey was long, which some felt was inconvenient and/or unfair to participants.

In addition, survey questions themselves can be a source of discomfort or distress. Overall, focus groups revealed that participants were satisfied with VenEsperanza’s screening phase and most felt survey questions were clear, simple to answer, and suitable for understanding their situation. However, though representing a minority, several focus group participants did express feeling

uncomfortable with questions, explaining that having to provide personal details about their situation made them feel embarrassed or ashamed.

Another, and even more severe source of potential distress to survey participants, according to key informants, is the risk of potential re-victimization of survivors of abuse, violence, or other protection concerns. Re-victimization, informants explain, can result from the types of questions posed, how questions are worded or asked, or because a perpetrator is present during interview, for instance.

**“When we first developed the survey, there was a real risk in whether we may re-victimize a potential survivor of any form of violence or abuse, or may identify someone in a situation with clear risk but maybe the perpetrator is present during the survey. From a protection perspective, these are things that we were thinking about and working through.”**

— Key informant

Lastly, the way that the survey is implemented can generate distrust or discomfort. Findings reveal a mix of survey methods applied among participants within any given focus group, with slightly more focus group participants interviewed in person vs. by phone. Focus group discussions demonstrated a definitive preference for in-person methods compared to remote ones. Most participants who answered the survey by phone expressed having felt scared, nervous, distrustful or skeptical about the legitimacy of the call, fearing it might be a scam. While most said they felt more confident by the end of the call, many still had doubts after hanging up. Participants cited additional phone-related challenges. A poor signal, for example, can result in broken conversations or lost connections. In addition, some participants don't have access to a phone, share a phone amongst many, or borrow a neighbor's phone, all of which can make it difficult or impossible to complete the survey by phone.

**“I felt distrustful at first because I wasn't sure who was really calling me. So many things happen around here and I felt afraid. After we talked, I felt better but I still had doubts right up until I got the card.”**

— Focus group participant in Medellín, Antioquia

**“At first, when they called me for the survey, I was unsure and afraid to respond. I think it's better to do it in person so you know who you're talking to. It's safer and more trustworthy.”**

— Focus group participant in Cartagena, Bolívar

## Risk mitigation and safeguarding

When it comes to survey design and question development, key informants recommend that, cash programs carefully consider and aim to balance the need for good data with respect for participants' time and comfort, avoiding overly lengthy surveys or potentially uncomfortable questions. To mitigate against re-victimization of survey participants, key informants consider it a best practice for all survey questions to be designed with the input of protection personnel and carefully reviewed and discussed again to ensure that the survey language and questions are appropriately framed.

*“In terms of re-victimization, I think a clear mitigation practice is having protection staff review the questions, thinking about, ‘Is this likely to re-victimize a potential survivor of sexual or gender-based violence?’ ‘Is it likely to generate uncomfortable feelings?’ One of the things we haven’t done yet, but we’re keen to do is psychosocial training. Save the Children has a methodology called psychosocial first aid, with light touch principles around how to talk to someone who may be in a situation of emotional distress. Thinking about the migrant and refugee population, who’ve gone through hardships and traumas and are in very vulnerable and difficult situations, a certain survey question may trigger them. We want anyone doing these interviews to feel like, ‘I have my principles, I can approach someone, I can calm the situation, I can orientate them to services.’ So we’re thinking about that as well.”*

— Key informant

Prior to survey implementation, there are several important mitigation and safeguarding strategies to consider. Key informants felt that staff training and oversight in proper survey implementation protocols, as well as empathy and emotional first aid, can prepare staff to administer surveys appropriately (e.g., in a safe, private, and comfortable place) and ensure they know how to respond to any signs of distress exhibited by individuals being surveyed. Articulating with protection partners and developing risk of harm protocols and procedures also arose as best practices so surveyors are equipped to make appropriate referrals and activate pathways for protection. To safeguard against the potential risk of pressure of any kind, informants were adamant that surveyors be well-trained in delivering informed consent protocols, so it is clear to participants that the survey is voluntary and there is no consequence if they do not wish to participate, decline to answer any question(s), or withdraw at any time.

#### **Best practices to establish and ensure trust:**

- In designing surveys, balance the need for good data with respect for participants’ comfort and time, avoiding uncomfortable questions or overly lengthy surveys. Include protection actors to mitigate against potential re-victimization.
- Prior to implementation, commit to (1) quality staff training and oversight in proper survey and consent protocols, as well as empathy and emotional first aid, and (2) articulation with protection partners, and (3) development of risk of harm protocols and procedures so surveyors are equipped to make appropriate referrals and/or activate protection pathways.
- During implementation, commit to (1) verification of participant identities, and (2) thorough explanations of the program and descriptions of the consent and survey processes.
- Prioritize in-person survey methods when possible. If conducting surveys remotely, consider including additional trust-building steps (e.g., orienting participants to the program or organization, extra verification checks, audio recording of consent and/or interview, etc.).

*“We take great care in telling participants, during the survey, that it’s a voluntary exercise and that they decide whether they wish to be in the process or not. We protect and respect their choice.”*

— Key informant

*“We are working to develop awareness-raising and prevention among staff and more articulation and coordination with protection partners, because if we identify a case of victimization, we can’t do case management directly. But we are fortunate to have articulation with other programs or with institutions present in the territory that can help us activate protection routes.”*

— Key informant

When it comes to survey implementation, evidence from focus group discussions reveal additional leverage points for programs to reduce the risk of distrust, discomfort, or distrust. Participants mentioned several practices that made them feel particularly safe, secure, and protected during the survey process. For example, focus group participants said that the surveyor’s verification of their identities (names, documents, etc.) and thorough explanations of the program and organization generated trust and confidence. Several said that they were encouraged by the surveyor to look up the organization online, helping to confirm legitimacy. Clear descriptions of the consent and survey processes also garnered trust and participants were assured by explanations that the survey is voluntary, that survey responses are anonymous and confidential, and that data is protected. The fact that the call and their consent were recorded made the survey feel official and trustworthy in the eyes of participants. Participants widely reported feeling respected by VenEsperanza staff during screening, citing that staff were kind, polite, and patient. The most common suggestion for improvement was to conduct the survey in person rather than by phone. While a select few preferred a phone survey, citing speed and convenience, the vast majority felt in person surveys are safer.

### **Inaccurate survey results (SCREENING)**

According to key informants, another potential risk during screening is the collection of inaccurate data. Informants explained that this may occur if instructions or questions are not sufficiently clear and/or participants don’t understand. Participant biases, such as acquiescence bias, courtesy bias, and social desirability bias may all affect participant responses and lead to imprecise results. Finally, participants may be dishonest, answering questions falsely in an attempt to be eligible or to receive greater benefit. For example, participants may claim not to have previously received any benefit, when in fact they had. They may also not be forthcoming about their documentation. Participants may also claim to have additional family members to receive a larger benefit or exaggerate or falsely describe their current situation in hopes of meeting vulnerability criteria.

*“Among the participants themselves or among those who know and understand the program well, there are people who tell others how to better answer the questions to receive more money. For example, “Say that you have eight people in your home, not three, because the cash value increases.” We’ve also heard of people who tell potential participants to divide as a family group so they receive transfers not for one head of household, but for two.”*

— Key informant

*“There was a woman walking along the line telling everybody how to lie to get into the program and that in itself is also a risk.”*

— Key informant

*“There is the possibility that the participant deceives us to get enrolled. For example, they already participated but lie and say that they have no documents or a problem with a visa so there is no way to corroborate the information for de-duplication. Or that they mislead us about family members, saying that someone's children are their own children for a greater benefit. Or they have family members apply for benefits in addition to those received.”*

— Key informant

## Risk mitigation and safeguarding

Several key informants have voiced the need for VenEsperanza to revisit its survey and to review question language, appropriateness, and relevance to reduce barriers to participant comprehension and help improve information shared by participants.

Key informants mentioned several best practices to mitigate against the risk of inaccurate survey data. The way VenEsperanza has designed its selection criteria is considered a best practice. Specifically, VenEsperanza assumed certain information bias and used a proxy means test, conducted by statistical experts, to reduce bias. In addition, VenEsperanza's selection criteria is automated within its data platform (CommCare), kept secret to staff and participants, and is composed of a combination of eligibility variables (47 total), to avoid having few criteria determine eligibility. Furthermore, the selection criteria scoring process has been periodically updated and modified based on econometric and statistical analysis, to further reduce bias and avoid the possibility of participants “learning” how to be selected. VenEsperanza survey staff receive regular trainings on how to deliver the survey and ask the questions.

Follow-up and verification procedures, conducted by VenEsperanza's monitoring and evaluation team, are also considered a best practice in ensuring accurate survey results. A certain percentage of participants, determined by set verification thresholds, are randomly and automatically selected from CommCare before each cash distribution and contacted to verify information. Verification procedures became especially important during the pandemic when implementation was conducted remotely. During that time, VenEsperanza increased the percentage of participants included in the verification phase from 3% to 10%. Thresholds were reduced upon resuming presential work, since such rigor was costly to the program and required considerable staff and time. Lastly, VenEsperanza has integrated a feature in the eligibility survey that allows surveyors to flag any suspicions (e.g., potential participant confusion or dishonesty) within the form itself. This feature is also considered a helpful mitigation strategy, as any flagged surveys are subject to additional follow-up and verification.

## Best practices for collecting accurate survey results:

- Revisit and review survey question language, relevance, and appropriateness to reduce barriers to participant comprehension and improve information shared by participants.
- Revisit and review eligibility criteria, using econometric and statistical analyses, to reduce information bias and avoid the possibility of participants “learning” the criteria.
- Regularly train survey staff on how to deliver the survey and ask questions. Incorporate methods for staff to “flag” any suspicions during the survey.
- Commit to rigorous follow-up and verification procedures to review accuracy of the data collected.

## Exclusion of potential participants (SCOPING, SCREENING, SELECTION)

Another risk described by both key informants and focus group participants is the exclusion of potential participants during scoping and or screening exercises. Both groups explained that potential participants may not be present at the time of an activity and thus may miss an opportunity to be identified or screened. Those at work or school during an activity, for example, may be left out of assistance even if they would have met criteria had they been surveyed. In addition, informants and focus group participants mentioned that phone-based scoping and screening activities may exclude those without phones. *Caminantes*, the name given to migrants walking through Colombia and other countries, were also cited by key informants as a difficult population for VenEsperanza to identify and thus at risk of being excluded as well. *Caminantes* often lack of access to economic resources, communication tools, and safe transportation and their constant mobility both inside and outside the country has been a significant challenge for program teams in terms of making initial contact, applying the eligibility survey, and carrying out the enrollment process, as well as providing protection and communicating key messages. During screening, another potential risk inherent in the design of the eligibility criteria is possible exclusion error (someone who should receive assistance doesn't) or inclusion error (someone who shouldn't receive assistance does).

When asked how VenEsperanza could improve, focus group participants' top suggestion for was to amplify scoping and screening activities to expand the program's reach and coverage. They perceived that there are still many people in need of the assistance who have not yet been reached. This finding aligns with post-monitoring surveys, which collected data from 1601 households across 10 departments in February 2022 and found that one in five VenEsperanza participants felt that there were people who deserved assistance but were excluded.

### Risk mitigation and safeguarding

To mitigate exclusion risks during scoping and screening, key informants and focus group participants considered that teams should consider returning to communities at different days and times during scoping activities or plan to provide multiple program "cycles" if appropriate to capture all potential participants in an area. Key informants felt that the latter strategy may be particularly effective in communities with high resident rotation, with members frequently moving in or out of the community. Both stakeholder groups suggested that cash programs commit to understanding the target population's phone access and design mitigation strategies accordingly.

Program figures indicate, for instance, that about 20% of VenEsperanza participants don't have access to their own phone lines. Instead, many can access a "community" shared phone, a common practice in Colombia. Thus, VenEsperanza has developed protocols in which staff call shared phone lines and request appointments with those on referral lists. This was particularly important during the COVID-19 pandemic, when scoping and screening were conducted remotely. VenEsperanza has since returned to in-person implementation, reducing exclusion risks for those without phones.

### Best practices to avoid exclusion of potential participants:

- Revisit communities on different days and times of day to scope/screen those who may have been absent the first time.
- Map out and assess which potential participants may be excluded from scoping and/or screening activities (e.g., those working and studying, those without phones, those who are highly mobile, etc.) and develop targeted strategies to reach those groups.
- Periodically revisit the selection criteria and conduct analysis to detect and correct inclusion or exclusion error.

To reduce potential exclusion of highly mobile populations like *caminantes*, VenEsperanza, in partnership with IMMAP, conducted a pilot aimed at registering *caminantes* along their journey through the country and providing them cash assistance upon arrival to their destination.<sup>5</sup> Since 2020, the consortium has implemented one of the first strategies in the country to meet the humanitarian, protection and socioeconomic integration needs of *caminantes* in transit from Venezuela who intended to stay in Colombia. More than 5,600 *caminante* families were registered, with 4,700 individuals surveyed for enrollment into the MPCA program. VenEsperanza employed strategies to identify and pre-register *caminante* families using common and accessible tools such as Facebook and WhatsApp to communicate and implement a short and simple registration survey. In doing so, the program was able to efficiently identify potential protection risks and employ mitigation strategies including (1) coordination within the consortium and with local actors to provide pre-registration, basic psychosocial attention, and key messages at main points along walking routes, (2) design of an integrated and harmonized system for registration, information management, case “hand-offs”, and communication with *caminantes*, and (3) implementation of de-duplication processes through unique codes for case management, allowing consortium partners to update contact information and report the arrival of *caminantes* to their destination.

To address potential exclusion (and inclusion) risks during screening, key informants consider it vital to periodically revisit selection criteria and conduct analyses to detect and correct any inclusion or exclusion error, ideally with the help and support of global experts and statisticians. Over time, there may be social, political, or economic shifts (e.g., inflation) that require adjustments and course correction. VenEsperanza, for instance, has refined its original definition of vulnerability through econometric analysis, based on a proxy means test model conducted by statistical experts, to reduce errors and to ensure assistance is directed to those most in need of humanitarian assistance. The resulting selection model is considered high-quality with low inclusion and exclusion error.

## Duplication of assistance (SCOPING, SCREENING, SELECTION)

For any assistance program funded by the U.S. government in Colombia, anyone having previously received or currently receiving assistance is ineligible for additional assistance. Therefore, anyone enrolled to receive U.S. government funded assistance more than once represents a duplication risk.

### Risk mitigation and safeguarding

Key informants consider that rigorous de-duplication procedures are required for any MPCA program. VenEsperanza, in coordination and harmony with Colombia’s other cash consortium, Cash for Urban Assistance (CUA)<sup>6</sup>, developed comprehensive de-duplication measures. Perhaps the most important of these was an investment in automated de-duplication within VenEsperanza and CUA’s data management platform, CommCare.

#### Best practices in de-duplication:

- Develop harmonized de-duplication processes in coordination with key actors.
- Automize de-duplication processes wherever possible.
- Design unique ID numbers for participants, composed of several identifying factors.
- Develop Data Sharing Agreements (DSAs) as early as possible.

<sup>5</sup> IMMAP. Consorcio VenEsperanza – Herramientas de captura de información. Available at: <https://colombia.immap.org/consorcio-venesperanza-herramientas-de-captura-de-informacion/>

<sup>6</sup> The Cash for Urban Assistance (CUA) consortium is composed of Action Against Hunger (AAH), Norwegian Refugee Council (NRC), and Danish Refugee Council (DRC)

Despite it having flaws and functionality issues at the onset, which have since been largely resolved, the ability to automate de-duplication of individuals directly within CommCare is credited with having dramatically reduced errors and the time and resources spent on de-duplication efforts between all partner organizations in the two consortia, as it was previously done manually. While this is highly regarded as a best practice in de-duplication, key informants do highlight several challenges that remain. For example, participants with double nationalities present a deduplication challenge because they may have received prior assistance with either of their identification documents. Using unique IDs, based on names, birthdates and sex rather than documentation, has helped address this challenge. Additionally, as of the writing of this report, UN agencies have not agreed to data-sharing agreements (DSAs) with the two consortia. This is seen by informants as a major obstacle that continues to stall and complicate deduplication efforts. Without a DSA in place allowing the exchange of personal data, it's essentially impossible to carry out de-duplication with UN agencies.

### **Program staff misconduct or corruption (SCOPING, SCREENING, SELECTION, DELIVERY)**

Staff misconduct poses another potential risk to MPCA programs, according to key informants. For example, program staff (and/or family members of staff) may solicit or accept kickbacks or favors for enrolling someone or for eliminating someone from the participant database (thereby avoiding duplication ineligibility so that person can potentially become a participant again). Staff might also enroll people that they shouldn't or enroll an imaginary "ghost" participant in order to reach participant targets in a certain region. Lastly, staff could potentially misuse a real or "ghost" participants' data, information, or identification for personal gain. Evidence suggests that while cases of program staff misconduct and/or corruption have occurred, it is uncommon.



*“There’s a risk that our own staff, in order to meet the targets for participants per region, call people and duplicate them.”*

— Key Informant

*“Staff could solicit kickbacks for many things: to remove someone from the main database to avoid being flagged for duplication in the future, to add someone to the referral list... They could ask for someone’s documents and use their personal information to obtain a benefit.”*

— Key informant



### **Risk mitigation and safeguarding**

Key informants consider that staff anti-fraud training, and regular refresher trainings, as well as staff oversight and monitoring for protocol compliance are important mitigation strategies. Informants also felt that any quotas or targets set for staff should be realistic and achievable and not cause undue stress or pressure. Furthermore, informants recommend cash programs ensure that (1) participants have access to CARM channels and (2) staff have access to internal integrity hotlines, with swift investigation into any allegations reported and consequences for confirmed cases of misconduct.

As mentioned earlier, a best practice gleaned from VenEsperanza is automated eligibility criteria, directly programmed into CommCare. This achievement allows the participant selection process to function more efficiently, with fewer errors, and with less bias and/or potential for corruption or coercion since surveyors don't know how criteria is determined or what variables factor into it. Another important practice is maintaining strict separation between program teams, financial teams,

and monitoring and evaluation teams with regards to access to the CommCare database, restricting information and limiting user access and editing/reviewing permissions to only those necessary.

#### **Best practices to prevent staff misconduct:**

- Provide regular staff anti-fraud training and refresher training.
- Conduct ongoing staff compliance monitoring and oversight.
- Set realistic and achievable targets.
- Ensure participants can access CARM channels and staff can access integrity hotlines to report misconduct/corruption.
- Commit to swift investigation of and response to any reported allegations.
- Consider automizing selection criteria and keeping it unknown to surveyors.
- Permit/restrict staff access to data on a “need-to-know basis” only, and separate team functions as much as possible.

### **Information provided is not understood or retained (SCREENING, SELECTION, DELIVERY)**

Information provided to participants by VenEsperanza staff may not be (fully) received, understood, or retained for any number of reasons. For one, illiteracy or low literacy may prevent a participant from being able to read or understand written information. A visual, hearing, or intellectual disability may prevent participant from being able to (fully) see/hear/understand information, respectively. A language barrier may be present, as is often the case for ethnic or indigenous communities. Any distraction (e.g., a child crying) or disengagement (e.g., because of hunger, thirst, stress, discomfort, etc.) when information is provided may prevent a participant from hearing, understanding, or retaining it. Furthermore, information itself, if not relevant or appropriate to a participant or presented in a clear, comprehensive or engaging way may not be effectively understood or absorbed.

### **Risk mitigation and safeguarding**

To ensure that information effectively reaches and is understood and retained by participants, key informants stress the importance of repeating key messages multiple times and in multiple ways. Presenting information through a variety of methods (visual, audio, written, etc.) improves accessibility. Best practices also include ensuring that accommodations or alternatives are provided and ensuring language interpretation or translation is available to those who need it. During talks, informants encourage staff to reduce distractions whenever possible and to address basic needs (e.g., offer food and refreshments, ensure bathroom access). People can't be expected to listen or learn when their basic needs aren't met. Lastly, checking comprehension by posing counter-questions and eliciting responses is considered a highly helpful practice.

#### **Best practices for ensuring information is understood and retained by participants:**

- Repeat messages multiple times and in multiple ways (visual, audio, written).
- Make accommodations and alternatives available to those who need it.
- Make language interpretation and translation available to those who need it.
- Reduce distractions (set up child spaces).
- Meet basic needs (provide food and drinks; ensure access to bathrooms, etc.).
- Ask comprehension-checking questions.

*“Asking questions is fundamental because sometimes people say they listen, but they're not listening, so repeating and counter-asking, “how many transfers are we going to make?” and have the person tell you. That tells us as a team that the message was received. In events, we do counter-questions, question roulette... what we want is for everyone to leave with the information.”*

— Key Informant

*“At the recommendation of the consortium, we always try to have child spaces at any event so that caregivers can focus on the activity without distractions and receive the information in the group talk. Or if a parent misses something because say, a baby or child is crying, and they get distracted and are no longer listening, we give the talk individually to those parents afterwards.”*

— Key informant

### **Efecty-specific risks (WITHDRAWAL)**

Findings from key informant interviews and focus group discussions reveal that participants may encounter several obstacles and limitations at the moment of withdrawal at an Efecty site, all of which risk them being unable to access their funds on time or at all. One potential risk is exploitation of participants by service provider personnel, Efecty agents, in the case of VenEsperanza. For instance, an Efecty agent may intentionally or mistakenly disperse the incorrect amount to participants. While the vast majority of focus group participants had not encountered this problem, several did report that Efecty agents dispersed less cash than they were owed. Another potential risk is that an Efecty attendant may needlessly charge participants for unnecessary services (e.g., for photocopies of documents) or charge them a tax to release funds. Unnecessary charges by Efecty attendants were cited by a couple of focus group participants, who chose to go to another Efecty point to withdraw instead. Furthermore, while not evidenced in focus group findings, key informants listed additional potential risks wherein Efecty attendants may (1) misuse a potential participant's personal information for their own personal gain or (2) steal from participants, cashing-out a participant's account and pocketing the cash but telling the participant that funds are not available.

Findings also revealed other Efecty-specific risks in the form of structural barriers. For instance, participants' information may be incorrectly entered during registration, which can prevent them from being able to access funds. Among participants who reported problems accessing their funds (a small minority of participants overall), this was one of the more common issues encountered. Participants described how they were unable to access their funds due to errors with their name, documentation numbers, or other information. Fortunately, participants said this was typically easily and quickly resolved by contacting VenEsperanza staff through the helplines.

Another, even more frequently reported problem was Efecty sites not having sufficient funds to disperse to participants. In the face of this obstacle, most focus group participants described eventually being able to access funds by choosing to go to another Efecty site (which may or may not have been close by) or returning on a different day or at a different time. Thus, this obstacle often implied inconveniences for participants or delays in them being able to access their funds.

Lastly, Efecty operates both branch and franchise offices, the latter of which are not subsidiaries of Efecty and thus have their own administration and policies. This can result in different - and sometimes worse - withdrawal experiences depending on the site and can generate confusion among participants. For instance, focus group participants stated that some sites required them to present copies of their IDs, while others did not. Some participants also said that how they were treated by Efecty agents differed from site to site, leading them to prefer certain sites over others.

## Risk mitigation and safeguarding

A lesson learned from VenEsperanza's experience is that cash programs should commit to establishing a working relationship with financial service providers, like Efecty, from the moment of contracting, to ensure their understanding of humanitarian assistance programming obligations and standards. Informants considered it a mistake and a missed opportunity for VenEsperanza not to have worked closer with Efecty from the outset to establish this fundamental groundwork. That said, the consortium has stepped up efforts to engage in regular conversations with Efecty leadership to develop protocols, guidance, and Efecty agent training on how to attend participants, requesting it be disseminated throughout the franchise. Learning from this experience, informants

recommend that future cash programs work with service providers from the onset to develop procurement documentation that includes a code of conduct and contracts that have clear anti-fraud clauses, specifying required actions and accountabilities in the case of at least one substantiated claim. Ensuring a commitment to reoccurring anti-fraud trainings and regular auditing of franchises are also considered essential safeguarding strategies.

Drawing on VenEsperanza's best practices, another way MPCA programs can protect participants is by equipping them with information about risks and safeguarding strategies and ensuring that communication channels are always accessible should they encounter a problem. VenEsperanza has committed to robust anti-fraud messaging campaigns, emphasizing that assistance is free and that they should not pay anything to access funds. Key informants also considered it a best practice to encourage participants to report any instances of fraud (a completely private process without any consequences to them) through VenEsperanza's CARM channels. For this to be most effective, key informants consider it essential that any allegations of non-compliance or alleged fraud by service provider attendants, reported through CARM channels, be brought to the attention of leadership as quickly as possible and followed through to resolution.

Participant reporting, as well as post-withdrawal follow-up and verification exercises, are also deemed to be important safeguarding strategies as they can identify any protection risks and/or illuminate obstacles, such as cases of insufficient funds at Efecty sites. To avoid these occurrences,

### Best practices to safeguard against Efecty-specific risks:

- Establish a working relationship with service providers from the onset and ensure their understanding of humanitarian assistance program obligations and standards.
- Don't assume service providers are familiar with humanitarian architecture or with donor expectations or requirements. It is important to accompany them in this process and establish clear guidelines, expectations.
- Ensure that service providers conduct regular anti-fraud trainings and auditing.
- Develop robust anti-fraud information and messaging campaigns for participants.
- Commit to rigorous post-distribution follow-up and verification exercises and consider "phantom client" exercises to illuminate access barriers and develop response plans.

VenEsperanza has coordinated with Efecty leadership, notifying them of planned transaction dates in advance so they can ensure local Efecty points have sufficient resources to dispense (Efecty has requested 5 days' notice). Alternatively, or additionally, cash programs can plan for transfers in a certain area to be spread out over different dates so that participants are not all approaching local Efecty points at the same time. This may avoid Efecty sites "collapsing" from a lack of capital and may have the added benefit of reducing potential targeting of participants in a community.

Key informants also cited IRC's "phantom client" exercises as a best practice for improving the withdrawal experience of participants. During these exercises, Venezuelan staff pose as participants and undergo all steps to withdraw cash just as a participant would, allowing them to identify any obstacles, which they can then raise to leadership and discuss with Efecty focal points.

*One exercise that we like a lot is what we call "phantom client". We develop a matrix to determine the most common Efecty points and times when most people go. We'll have one of our Venezuelan staff go, dressed in regular clothes, and stand in line, listening to everything that happens. Then she or he arrives at the counter and says, 'oh, I lost my ID, could you still give me my transfer without an ID?'. We'll test all kinds of scenarios to see how the financial provider deals with it. We've identified cases of xenophobia, poor protocol adherence, etc. We'll report findings from the exercise and use it to coordinate with our focal point with Efecty, to raise and work through any issues we find."*

— Key informant

## Cash card-specific risks (WITHDRAWAL)

When asked about cash-card specific risks, key informants and focus group participants identified several. For instance, cash card recipients may face several potential risks related to the safe-keeping of the card - which can be lost, stolen, or damaged - and pin, which can be forgotten. While many focus group participants cited these issues as potential risks, none of them reported lost, stolen, or damaged cards, and only a couple reported having forgotten their pin, which they were readily able to reclaim by contacting the VenEsperanza helpline. There are also potential risks associated with the use of card at ATMs or stores, in which participants can incur charges, limiting or preventing participants from accessing the full amount of funds transferred. Charges, commissions, and fees were among the most common issues reported by cash-card participants. Furthermore, since participants can only withdraw cash from ATMs in multiples of ten or twenty-thousand pesos, they often can't access their full transfer unless they buy something equal to the remaining amount via debit. Focus group findings suggest that a small fraction of cash-card recipients was not aware of or did not know how to access funds via debit (only ATM withdrawal).

## Risk mitigation and safeguarding

Since there is no way to reclaim bank fees or commissions, participants must avoid these charges in the first place. Thus, key informants consider that the most important mitigation and safeguarding

strategy is informing participants about bank charges and providing step-by-step instructions and recommendations on how to avoid them. The same goes for informing participants about withdrawal options. With regard to reclaiming a forgotten pin or replacing a lost, stolen, or damaged card, participants have to contact the VenEsperanza team. Thus, ensuring that participants have access to helplines and communication channels is also essential.

Recommendations for informational talks and communication of key messages are described in greater detail in the “Communication and key messages” section further on.

#### Best practices to safeguard against cash cards withdrawal risks:

- Through communication of key messages and talks that provide step-by-step instructions and recommendations, inform participants about withdrawal options and about bank charges and how to avoid them.
- Ensure participants have full access to helplines and communication channels so they can request help and report issues.

### Stigmatization and/or targeting of vulnerable households (SCOPING, SCREENING, SELECTION, DELIVERY, WITHDRAWAL)

Key informants reported that an unfortunate and unintended consequence of targeting the most vulnerable households to receive assistance is that cash programs may inadvertently “reveal” or “expose” the household’s vulnerability to the community, which can result in stigmatization of the individual or family that lives there. Another potential risk exists, key informants explain, if and when a household is known to be receiving cash assistance, which can make any members of that household a target for theft or fraud.



*“There’s always the risk that you’re identifying very vulnerable families within a community. I think sometimes we find that there’s a risk of potentially bringing stigma to certain families.”*

— Key informant

*“It’s very likely that since we have many female heads of household, they may be targeted by people who want to harm, exploit, or take advantage of the fact that they are receiving resources.”*

— Key informant



According to key informants, the risk of stigmatization and/or targeting can occur at any phase of cash programming. A cash program’s scoping, screening, selection, and delivery activities and/or events, if not sufficiently discrete, can generate community attention and potentially stigmatize vulnerable households and/or signal individuals or families that may be/become participants, which may make them targets. There is also potential risk during the withdrawal phase. If, for instance, all participants in a community receive transfers and withdraw at once, it may reveal who is or isn’t receiving assistance and who may have cash at hand. Findings from both interviews and focus groups suggest that the risk of stigmatization and/or targeting is likely greater for participants in small and close-knit communities, where actions or behaviors are more easily noticed, compared to counterparts in urban centers who benefit from more anonymity and privacy.

### Risk mitigation and safeguarding

When holding any event, key informants recommend keeping it small and holding it outside the community itself to avoid drawing undesirable community attention. Requesting discretion from all

parties who know about the program can also help the program and its participants stay under the radar. During informational talks, a good practice is requesting that participants keep their status private and not tell others about the assistance. Informants also recommend clear communication with trusted leaders and key actors about where and when an organization plans to conduct activities in the community, clearly explaining the goal of the activity and who should and shouldn't be involved. Lastly, spreading out transfers to participants within the same community, so they receive the benefit on different days, can avoid mass transfer and withdrawal patterns that may attract attention and/or lead to stigmatization or targeting. This is considered especially important in smaller, close-knit communities with many participants.

#### **Best practices to mitigate stigmatization and targeting of vulnerable households:**

- Keep events small and hold them outside the community when possible.
- Request discretion from all actors to avoid revealing who participants are.
- For participants within the same community, spread transfers out across different days to avoid mass withdrawals.

*“Colombia is a supremely insecure country and the communities in which we work are even more so. When we hold large events, we could put people at risk because we are putting a ‘target’ on their back; that this person is receiving help. So that's why we have to do very small events and be very careful with what we say on the ground. We never, for example, mention it's a cash program, only to the participants.”*

— Key Informant

### **Generation of tension within communities** (SCOPING, SCREENING, SELECTION, DELIVERY, WITHDRAWAL)

Key informant and focus group findings revealed that the selection of some households into the program and not others can generate tensions within communities if the recipients of assistance are known. Since the risk of a participants' status becoming known can happen during any of the five phases (as described above), so too can the resulting risk of tension or discord in communities.

While VenEsperanza does include Colombian returnees and host community members (30%), the majority of those targeted for MPCA are Venezuelan migrants and refugees (70%). This percentage breakdown is due to a directive of the Colombian Government and the donor's mandate to provide life-saving humanitarian assistance. Key informants perceive that the programmatic distinction between those affected by a humanitarian emergency (i.e., the Venezuelan crisis) vs. those affected by other socio-economic inequalities (e.g., structural poverty), however, is not widely known, understood, or appreciated by communities. This can result in tension and/or resentment of (mostly) Venezuelan participants by their Colombian neighbors and community members, who see them as getting “preferential treatment” despite living in perceptibly similar circumstances of vulnerability.

*“Often the consortium and donor's expectations regarding target percentages of Venezuelans and Colombians creates situations where, for example, two people who exhibit the same vulnerability in the same place aren't both selected because of criteria. That puts those selected at risk of rejection from their neighbors and community. It creates [the question]: ‘why them yes and us no.’”*

— Key informant

*“There’s always difficulty when you’re doing that first eligibility survey. If someone isn’t eligible and maybe their neighbor is eligible, navigating those kinds of inter-communal tensions, trying to explain why one family was selected and another wasn’t, is hard. The main feedback that tends to come from MPCA program participants is: ‘I didn’t get selected. But people in my community did. Why is that? Why isn’t there cash for everyone?’”*

— Key informant

Focus group participants in all departments except Antioquia described having experienced problems in the community owing to their participant status. While in most cases, Venezuelan participants described receiving backlash from the Colombian community, there were also Colombian participants on the receiving end of criticism from the Venezuelan community. Some participants described family tensions as a result of one member being selected while another was not. In smaller community settlements, where everyone was more or less aware of who was receiving assistance and who wasn’t, tension arose both among recipients, who felt some level of guilt that they were selected over others in similar or even worse conditions, and among non-recipients, who were perceived to manifest resentments for not having been selected.

*“Where I live, the majority are Venezuelan and they haven’t received assistance. They criticize me a lot because I’m Colombian and they say that they need it more. So, I’ve had that problem many times.”*

— Focus group participant in Bogotá

*“That’s been really intense. They say that, ‘since you’re from Venezuela, you receive help and us Colombians don’t.’”*

— Focus group participant in Bogotá

### **Risk mitigation and safeguarding**

The strategies presented above for the mitigation of stigmatization and targeting of vulnerable households (i.e., discretion) can also serve to mitigate community tensions by reducing/eliminating awareness of assistance among non-participants. Key informants consider this easier to achieve in larger cities and urban areas and much more challenging or nearly impossible to achieve in smaller, close-knit communities. In the latter case, a strategy that some VenEsperanza partners have employed is offering complementary activities/services (e.g., health) to all community members, regardless of cash participant status.

#### **Best practices to prevent and/or mitigate community tension:**

- See prior section’s best practices on program discretion.
- In communities where program discretion is challenging/impossible, consider providing complementary services to all community members, whether or not they receive cash assistance.

*“We must always maintain the awareness of key actors and communicate criteria, so that they don’t forget that the purpose of the program is emergency assistance and the goal is to effectively direct resources to the most vulnerable populations.”*

— Key informant

*“In terms of community expectations, I think the key is mitigation from the get-go. When you do that kickoff, even before eligibility interviews, making it very clear there are limited resources, there are clear criteria. In the communities where we're giving cash, we try to complement with other services, so, child friendly activities, temporary education activities, and make sure the community understands that even if someone is not necessarily eligible for this intervention, there are other services we can provide.”*

— Key Informant

## **Leak of information/data or breach of confidentiality/privacy (SCOPING, SCREENING, SELECTION, DELIVERY, WITHDRAWAL)**

Another risk that spans across the five phases is the potential for a leak of information or data, which can result in a breach of confidentiality or privacy. Any time personal information or survey responses are collected from participants, key informants report that there is a risk that data collected may not be adequately protected and fall into the wrong hands. There is also the risk that a participant's confidentiality or privacy may be breached in the event of a data leak or if survey responses or other information are overheard by someone who may misuse information, by taking advantage of exposed vulnerabilities or the potential of future benefits, for instance.

*“Everything related to safeguarding sensitive information - name, ID numbers - is carefully regulated in Colombia under habeas data.<sup>7</sup> So we're very meticulous with personal information.”*

— Key informant

*“A potential risk is that sensitive information is leaked to criminal groups... that information about either our employees or our participants, or both, fall into the hands of the FARC or ELN,<sup>8</sup> or the paramilitaries, or any other criminal group.”*

— Key Informant

## **Risk mitigation and safeguarding**

Key informants highlighted several strategies to mitigate against leaks of information or data or breaches in confidentiality or privacy. For one, MPCA programs must develop and enforce stringent internal data protection policies and procedures, in accordance with national data protection and treatment laws. Furthermore, MOUs and DSAs with referral partners should describe expectations and minimum standards

### **Best practices to avoid ensure data security, privacy and confidentiality:**

- Develop and enforce stringent internal data protection policies and procedures.
- Develop MOUs and DSAs with referral partners to set minimum standards related to management of participants' personal information and other data.
- Develop SOPs and commit to regular staff trainings and oversight.

<sup>7</sup> *Habeas data* is a Colombian constitutional law that protects and regulates the use and treatment of personal information. Source: <https://www.sic.gov.co/manejo-de-informacion-personal>

<sup>8</sup> The Revolutionary Armed Forces of Colombia (known by its acronym in Spanish: FARC) and National Liberation Army (known by its acronym in Spanish) are Colombian guerilla groups. Source: <https://www.britannica.com/topic/FARC>; <https://www.britannica.com/topic/National-Liberation-Army-Colombian-guerrilla-group>

related to management of participants' personal identifying information (PII) and other data and establish a single focal point with the ability to manage and send encrypted databases for referral and reporting purposes. Lastly, key informants highlight the importance of ensuring that data collection and management are conducted in accordance with standard operating procedures (SOPs) and reinforced through enumerator trainings and oversight.

### **False identity and impersonation (SCOPING, SCREENING, SELECTION, DELIVERY, CARD WITHDRAWAL)**

Another potential risk is false identify or impersonation, wherein someone is dishonest about their identity in hopes of benefitting from the program, and it can emerge during several different programmatic phases. During scoping, for instance, there is a risk that potential participants, identified either by direct community scoping methods or indirect referrals, aren't who they say they are. Compared to direct, in-person scoping exercises, where identities are typically easier to verify, key informants consider that the risk of false identify or impersonation is usually higher when it comes to referral lists. Thus, this risk was particularly concerning for VenEsperanza during the pandemic, when teams had to rely almost exclusively on the referral lists of local partners, typically composed of names and/or ID numbers that can be hard to verify.

During screening, selection, and delivery, there is a risk of a non-participant posing as or acting in the place of a participant. In the former instance, someone may be fraudulently impersonating the participant without the true participant's awareness or permission, while in latter instance, the participant may have intentionally asked someone to act on their behalf.

During withdrawal, the identification verification procedures (ID and fingerprint) at Efecty are fairly rigorous and the risk of false identity impersonation of a participant is fairly low. However, there is no such identity checkpoint for cash card recipients at the moment of withdrawal of funds at an ATM and thus the risk of a non-participant withdrawing funds from a participant's account is much higher as anyone with the card and pin can access the account's funds. There are a number of instances where foul play can occur. First, a thief can steal a participant's card and pin and thus rob the funds either through withdrawal at an ATM or charge as debit at a store. Second, a thief can steal the card, and in some instances, can rob the funds even without the pin if charging as debit at a store (i.e., in some stores and for smaller amounts, a pin is not required). Lastly, the participant can intentionally give their card and pin to someone to withdraw the funds on their behalf and that individual might decide to steal the funds through any number of strategies (e.g., take the cash and disappear, take the cash and claim that it was stolen or that the ATM didn't release some/all of the cash, etc.).

### **Risk mitigation and safeguarding**

Key informants highlighted several best practices and lessons learned. During scoping, VenEsperanza employs various verification processes to confirm the identity of potential participants. Typically, team members conduct visits to confirm people's identities through in-person documentation checks. During the pandemic, however, when the team was limited to remote methods, team members consulted online databases to look up and cross-reference names and identification document numbers/dates and made verification calls to review whether referred persons were in the country, vulnerable/affected by the crisis, and were who they said they were.

During screening, selection, and delivery, VenEsperanza staff confirmed verification exercises at the beginning of any interaction with participants by always confirming their name and identification

document number, whether over the phone or in person, and by re-asking certain questions from the screening survey to check for consistency as a way to confirm it is in fact the same person.

During Efecty withdrawal, there is little risk of someone impersonating participants if Efecty agents follow proper ID verification protocols. For cash card withdrawal, however, the best and only strategy is to educate the participant about risks and safeguarding practices (e.g. don't share your card or pin with anyone, don't leave your card where someone could take it, etc.) since there is no other way to confirm identity at the moment of withdrawal, and thus anyone with the card and correct pin can withdraw funds from the account.

#### Best practices to avoid false identity and impersonation:

- During scoping, conduct in-person visits (preferred) or calls to verify identification of potential participants.
- During screening, selection, and delivery, confirm the participant's name and ID number at the beginning of any interaction. When possible, re-ask certain questions from the screening survey to check for consistency as a way to confirm it's the same person.
- For withdrawal, educate participants - especially card recipients- on risks and safeguards to prevent anyone but the intended participant from withdrawing.

*“When we were working remotely, we increased verification procedures. As a team, we tried to validate the identity of the person first, by corroborating document numbers and dates before the eligibility survey. Later, we'd call and ask them the same questions, to see if the answer coincided with before. We found instances of false identity, like the sister pretending to be the participant, etc. So, we had to try to mitigate that.”*

— Key Informant

### Security risks (SCOPING, SCREENING, DELIVERY, WITHDRAWAL)

Insecurity is prevalent in many of the areas where VenEsperanza works and is considered a major risk by key informants and participants alike. Participant and staff security may be jeopardized by delinquent activity or violence at the hands of criminal organizations, gangs, armed groups, or other offenders throughout the program phases. Theft of cash or cards (or other personal items such as phones) in route to or returning from events and/or withdrawals at Efecty points, ATMs, or stores was the number one risk identified by focus group participants, mentioned in all departments.

### Risk mitigation and safeguarding

To mitigate and safeguard against security risks, key informants listed several helpful strategies. For instance, informants recommended MPCA programs engage in community pre-analysis and scoping. Security and risk mapping, ideally in the company of security teams and community leaders to scope out an area and understand the panorama of the territory, can help determine whether and how to implement there. Ongoing advocacy and communication with local authorities is also essential, as they can provide support to the program, maintain order, and improve security. Key informants felt that ongoing contextual and local

#### Best practices to safeguard against security risks:

- Invest in community security and risk mapping, ideally within the company of security teams and community leaders to scope out an area and understand the panorama of the territory, as well as ongoing contextual and local risk monitoring and contingency planning.
- Commit to ongoing communication and advocacy with local authorities.

risk monitoring and contingency planning is also crucial; as is the selection and set-up of safe events, described in greater detail later on.

## **Xenophobia or discrimination** (SCOPING, SCREENING, SELECTION, EFACTY WITHDRAWAL)

Xenophobia against Venezuelans or discrimination against Colombian returnees is prevalent in Colombia and key informants explained that it can become amplified or entrenched if community members perceive that these groups are (unfairly) receiving more assistance. Informants reported that xenophobia or discriminatory biases against the target population by third-party intermediaries, inter-agency partners, or other external actors, who are major sources of referrals, may negatively influence potential participants' access to services and/or referrals to the program. Similarly, participants can also face xenophobia or discrimination by Efecty agents, which can translate to poor treatment or mistreatment of participants at Efecty points. Lastly, key informants cited the potential risk of explicit or implicit biases among program staff, which may negatively affect the way staff treat or interact with participants. Such biases, they went on to explain, can also undermine trust in the program, affect whether/how participants ask or answer important questions, or report any issues they encounter.

Focus group participants described experiences with xenophobic or discriminatory behavior or attitudes by community members and by Efecty attendants. Focus group findings reveal that xenophobia within communities is prevalent and pervasive; for many, it was described as an everyday reality. A smaller proportion of focus group participants experienced xenophobia at the hands of Efecty staff and typically reacted by going to a different Efecty point. In two sites, several participants reported that Efecty agents gave them less than the amount they should have received.

### **Risk mitigation and safeguarding**



*“Not all Efecty points are the same. There are some where they discriminate against Venezuelans and others where they don’t. You have to change points sometimes to avoid problems.”*

— Focus group participant in Bogotá

*“Once I went to withdraw 370,000 pesos and I immediately put it in my bag. Then I went to spend it at the store and when I checked, I only had 350,000. I was missing 20,000 pesos. The woman gave it to me incomplete. Because I’m indigenous, they want to take advantage of me and treat me badly.”*

— Focus group participant in Riohacha, La Guajira



Key informants credited several VenEsperanza practices with helping to safeguard participants against xenophobia and discrimination. When possible and appropriate, VenEsperanza provides referrals and other services to the community at large, not just to participants, in order to reduce potential perceptions of “unfair preferential” treatment of one group over another. The consortium has also increased communication with Efecty management to raise awareness and hold Efecty agents accountable to fair treatment of all clients, including VenEsperanza program participants, regardless of nationality, background, or origin.

One challenge that remains, as evidenced from focus group interviews, is that while many expressed having experienced xenophobia from Efecty staff, none reported it through VenEsperanza CARM channels, choosing instead to visit a different Efecty site or go at a different time. This can make it difficult to identify and investigate cases of xenophobia, and additional work is likely needed to identify and investigate cases.

#### **Best practices to safeguard against xenophobia or discrimination:**

- Educate program staff and service provider staff about illicit and implicit biases and discrimination – what it looks like and how it can present itself - and about accountability, expectations, and consequences.
- Encourage participants to report any experiences of xenophobia or discrimination through CARM channels.

## **COVID-19 transmission (SCOPING, SCREENING, CARD DELIVERY, EFECTY WITHDRAWAL)**

The bulk of VenEsperanza’s MPCA programming took place during the global pandemic, when there was the risk of COVID-19 transmission and infection during any in-person activity involving contact between two or more persons.

### **Risk mitigation and safeguarding**

VenEsperanza adapted scoping, screening, and Efecty delivery phases to be conducted by telephone during the peak of the pandemic to reduce COVID-19 exposure risks. Two phases, however, still required close physical contact between two individuals. Cash card delivery requires an in-person exchange of the physical bank card from a VenEsperanza staff member to the participant and Efecty withdrawal requires an in-person exchange of cash from an Efecty agent to the participant. In both instances, strict biosecurity measures (e.g., physical distancing, facemasks, hand sanitizer, etc.) were followed to reduce the risk of COVID-19 transmission and infection.

## **Core components and key considerations for protection**

This section presents additional components and considerations that are key in protecting participants of any MPCA program.

### **Selecting and setting-up safe and welcoming events**

MPCA programs often organize and hold events with participants at key programmatic phases. VenEsperanza, for instance, commonly holds events during the screening and delivery phases. During the COVID-19 pandemic, these phases were primarily conducted over the phone but have gradually shifted back to in-person as the pandemic-related restrictions have lessened. As of the writing of this report, all activities, including screening and delivery events, should now be conducted in person. A summary of best practices related to event planning are presented at the end of this section. Several of these have already been mentioned in this report. For instance, key informants recommended smaller events outside of communities to avoid generating expectations and/or revealing community members with participant status, which can lead to stigmatization and targeting. Informants also recommended reducing distractions (e.g., by setting up child spaces) and meeting participants’ basic needs (e.g., providing food and drinks; ensuring access to bathrooms, etc.) to ensure that any information provided to participants is received and understood. Lastly, key informants suggested several measures (e.g., safe sites, day-time schedules, security personnel presence) to safeguard against security risks.

Additional best practices for selecting and setting up safe and welcoming events can be gleaned from focus group discussions. Most participants who attended in-person events (cash card recipients and some Efecty recipients) spoke positively about the experience and generally considered events to be well-organized with convenient schedules. They mainly described the spaces in favorable terms: large and comfortable, accessible, safe and secure, clean, and even well-decorated. Participants were especially satisfied and appreciative when events had dedicated child play spaces and offered refreshments (drinks or snacks). Participants also spoke favorably about VenEsperanza staff, who they described as attentive and supportive during events. They praised staff for providing directions to event locations when needed, answering any questions, resolving doubts, and providing comprehensive and helpful informational talks. Participants also appreciated when delivery events offered complementary or integrated services or resources, such as those relating to physical/mental/sexual & reproductive health, livelihoods, education, financial literacy, nutrition, child protection, and legal/immigration-related matters. They also cited strict biosecurity protocol adherence, the presence of hygienic facilities, and attendance of security personnel as favorable. In contrast, participants made it known when event spaces were unfavorable. In two cases, for example, event spaces were deemed to be too far away and in insecure areas, which left them feeling unsafe and on edge when arriving and leaving the event.

#### Key considerations for selecting and setting-up safe and welcoming events:

- Use discretion when event planning by avoiding large events, holding events outside communities, and requesting participants keep the location and timing of the event to themselves.
- Hold events in safe and comfortable spaces with hygienic facilities (e.g., clean bathrooms and wash areas). Bring hygiene and sanitation products (e.g., toilet paper, soap, feminine hygiene products) if not already available on site.
- Hold events in accessible and secure locations. Consider providing travel reimbursements if participants must travel long distances.
- Choose schedules that allow people to arrive and return home during daylight hours.
- Dedicate staff to make/answer calls and provide directions to the site.
- Commit to constant local risk monitoring. Rotate spaces as a safety measure. Suspend events if necessary (e.g. to avoid risks posed by strikes/protests, threats by armed groups, etc.), informing all attendees.
- Provide refreshments. Minimally, make water available to attendees.
- Offer child-friendly play spaces, with staff care support to allow parents to participate.
- Consider having security personnel at events, when appropriate.
- Consider offering complementary services, when appropriate.
- Adhere to strict biosecurity measures (e.g., physical distancing, facemasks, hand sanitizer).



## Communication and key messages

### Communication of important information

VenEsperanza partners communicate important information to participants in a number of ways, including but not limited to: mass WhatsApp messages (sent via CommCare), individual phone calls, in-person house visits, in-person events and presentations, printed materials, social media, community mobilizers and volunteers, and third-party communication streams.

Key informants consider that having a variety of communication channels is essential for ensuring that accurate and up-to-date information is accessible to a range of participants with diverse preferences and capacities. Special considerations should be made to include different demographic subgroups, including those participants who are disabled, those who are illiterate, and those without phone or internet access, among others. Informants also highlight the importance of ongoing and repeated communication throughout the program to reinforce key messages. Equally important is ensuring that messages are harmonized across all consortium partners and updated regularly to reflect current realities. The national cash working group<sup>10</sup> conducts continuous situation monitoring in Colombia and produces a monthly document with key anti-fraud messages that are important for cash participants to receive (see right). For example, to counter false information around elections, the working group developed messages to insist that assistance is not connected to any political party or affiliation. Messages have also been developed to inform participants of helpful resources, like the government's temporal protection status for Venezuelans. Lastly, informants consider it extremely important to communicate with participants about any changes or delays to cash transfers. Not doing so, they warned, can have major negative consequences for participants who are counting on those funds and can have reputational risks for the program since it can undermine participant trust. Even when transfers arrived as expected, focus

#### A sample of the Colombian Cash Working Group's anti-fraud messages<sup>9</sup>:

- “Don't be fooled! Remember that all services and products delivered by [*Organization*] are free and do NOT need intermediaries.”
- “Remember! Humanitarian aid is free. Under no circumstances do humanitarian organizations ask for financial resources or favors in exchange for services.”
- “No humanitarian worker should collect money from you or ask you for any kind of payment in return. You can report these situations through: [*XYZ channels*]”
- “If anyone asks you for votes in exchange for humanitarian aid, don't be fooled. It's fraud.”
- “If someone tells you that they work with humanitarian organizations but ties aid with political interests, be suspicious. It's fraud.”
- “If someone offers you access to a humanitarian aid program in exchange for your vote, report it. Buying votes is a crime.”
- “Let no one decide for you. Your vote is secret and should not depend on someone offering to include you in humanitarian aid programs in exchange.”

<sup>9</sup> Selected and translated from the working group's “Estrategia de Comunicación con Comunidades: parilla de mensajes clave 2022. Versión 4”.

<sup>10</sup> Set up in 2016, cash working group (CWG) has sought to ensure a coordinated, harmonized, effective and efficient response for interventions using Cash and Voucher Assistance (CVA) as a modality, for both sectoral and multisectoral interventions. <https://data.unhcr.org/en/working-group/217> (Accessed August 11, 2022).

group participants that received calls or texts when transfers were made (not a universal practice across organizations or locations) were grateful for confirmation.

## Key messages

Drawing from qualitative data collection and document review, a summary of key VenEsperanza messages is presented below. While not a comprehensive list, these messages all convey essential information and recommendations to safeguard participants throughout the program.

### Key messages for MPCA participants:

- Participants should receive information about the program: its purpose, partners, and funder.
- Participants should know the exact amounts and duration of assistance they will receive.
- Participants should learn when and where they can withdraw their funds once transferred.
- Participants should never pay fees, bribes, or favors to access assistance. Assistance is free.
- Participants should not accept help from third party intermediaries to access assistance.
- Participants should receive all communication channels and be encouraged to:
  - contact the VenEsperanza team with any questions, doubts, or issues.
  - denounce any cases of mistreatment, abuse, extortion, exploitation, or fraud by reporting it to the VenEsperanza team (with no negative consequence to them).
- Participants should save receipts of transactions for their own records.
- Participants should learn what the cash assistance is and isn't meant to be used for.
- Participants should not tell anyone about the assistance they are receiving, and store written program materials in a safe and private place to avoid people learning they are a participant.
- Participants should receive recommendations for withdrawing money safely, such as:
  - withdraw in sites that are in safe areas and avoid insecure areas.
  - withdraw during daylight hours and avoid withdrawing at night.
  - consider withdrawing in the company of a trusted companion instead of alone.
  - consider withdrawing at different sites and times for added security.
  - avoid withdrawing if there are suspicious people close by.
- Participants should count money withdrawn to make sure amount is correct.
- Participants should know that assistance is not affiliated with political parties or agendas.
- Cash card participants should be provided with:
  - step-by-step instructions and simulations on how to use an ATM to withdraw funds and how to use a debit card feature at stores.
  - instructions and tips on how to avoid bank fees and commissions (e.g., withdraw from affiliated bank ATMs, don't withdraw more than the monthly limit, etc.).
  - recommendations for safe storage and use of the card and pin (e.g., keep it in a safe and private place, don't share the card or pin with anyone).
  - advice on how to access the full amount of their funds given ATM withdrawal limits (e.g., leave the remaining money until the next transfer; buy something that costs close or equal to that of the remaining funds in the account via debit card).
- Participants should be encouraged to save/invest if possible and advised against leaving their job or business if they have one because the assistance is temporary.
- Participants should receive any information about any other resources available to them.

## Fraud mitigation and management

With any cash program comes the need for fraud mitigation, detection, reporting, and response.

### Mitigation and detection

According to key informants, one of the most important ways to mitigate and prevent fraud is to ensure that participants, as well as other actors, are informed via regular anti-fraud campaigns and targeted messaging. If and when fraud cases do occur, it is essential that any cash program establish robust detection systems to identify potential cases and encourage all actors to report cases through established channels. An effective way to detect such cases is through Community Accountability Reporting Mechanisms (CARM), which aim to provide participants and community actors the opportunity to communicate with the program team to ask questions, raise concerns or complaints, provide feedback or suggestions, or report cases of exploitation, abuse, or fraud. While VenEsperanza partners have each developed their own individual CARM systems, the consortium has required that, at a minimum, each partner have three communication channels available to participants: a helpline phone number, WhatsApp, and email. Beyond these channels, partners are also welcome and encouraged to implement additional strategies, which have included comment/suggestion boxes in key sites, help desks, social media platforms, text messaging, websites, and focus groups, among others. Consortium level post-distribution monitoring (PDM) surveys and follow-up and verification calls are also useful practices. Key informants stress the importance of ensuring that CARM systems are up and running from the onset and carefully maintained to ensure optimal functioning. Similar to the “phantom client” exercise described earlier, conducting regular “test calls” to ensure lines are working is also a good practice. Informants emphasize the need for regular CARM analysis and discussions to identify and resolve bottlenecks and/or to make programmatic adaptations and improvements in response to information collected. Other strategies for detecting fraud cases include having robust relationships and communication with community networks including leaders and religious organizations as well as interagency coordination bodies who can directly report suspicions or allegations back to the consortium.

The majority of participants (with the exception of those served by one of the four partner organizations) had not received all three consortium-sponsored communication channels and those channels provided varied by partner. Few focus group participants used communication channels, mainly because the vast majority (96% according to PDM results) didn't have any problems accessing funds and thus, didn't have a need to reach out. Among those who did use a channel, most were satisfied with their experience and were able to reach a member of the VenEsperanza team who attended to and resolved their case. These findings corroborate with results of a July 2021 PDM survey, wherein 79% of respondents knew about the communication channels and 20% had used one, among which nearly 83% were “satisfied” or “very satisfied” with the channel. Notably, a handful of focus group participants were unable to reach the team despite multiple attempts.

### Reporting and response

Once potential fraud, exploitation, abuse or corruption complaints or allegations are received through partners' CARM systems, they are fed into a single digital template for managing cases, triggering a pathway for reporting, response and resolution. This pathway details how fraud cases are handled and reported (including deadlines and reporting obligations) by each partner's internal ethics and integrity team, service operators' (Efecty, bank) internal investigation teams, the consortium's ethics and accountability officer, and the donor's accountability offices, as well as feedback loops back to

the community and process changes as a result of learning. Informants caution that for this system to work effectively, it's extremely important that all cash program and service provider actors at all levels are aware of what fraud is and what their responsibility is in terms of reporting and responding to it. This requires developing clear fraud definitions and thresholds as well as protocols and procedures for reporting, ideally included in subawards from the onset. Once developed, an investment in coordination and communication with all staff about (1) standards and expectations regarding implementation, reporting, compliance, and oversight, (2) what constitutes sufficient evidence for investigating cases of fraud allegations, and (3) what documentation is/isn't accepted, should follow. This is an especially important when it comes to working with private sector service operators, who may not be used to standards related to humanitarian responses and donor funding.

**Best practices in fraud mitigation and response:**

- Commit to developing robust CARM systems with a variety of communication options.
- Make certain that CARM systems are up and running from the onset and carefully maintained to ensure optimal functioning. Regular “test calls” are a good practice.
- Establish minimum standards regardless of whether CARM is harmonized at the consortium level or left to partners. Monitor partner compliance with standards.
- Ensure there is a team dedicated to regular and timely analysis, compilation, and sharing of incoming CARM data. Facilitate spaces to regularly review and reflect on CARM data trends and build action plans to address any issues that emerge.

# Annex A: Resource toolkit

## Key resources

[The Cash Learning Partnership \(CaLP\) website](#)

[The Collaborative Cash Delivery Network \(CCD\) website](#)

[The Cash and Livelihoods Consortium of Iraq \(CLCI, formerly CCI\) website](#)

[VenEsperanza website](#)

## Cash program implementation guidance

USAID & Save the Children (2022) [Lessons Learnt from Latin America and Practical Guidance for Multipurpose Cash Assistance \(MPCA\) Integration](#)

Grand Bargain Cash Workstream (2022) [Multipurpose Outcome Indicators and Guidance](#)

IRC (2020) [Safe Cash Toolkit: Collecting and Using Data to Make Cash Programming Safe](#)

CaLP (2020) [Data Responsibility ToolKit: A Guide for Cash and Voucher Practitioners](#)

Mercy Corps (2018) [E-transfer Implementation Guide for Cash Transfer Programming](#)

Mercy Corps (2017) [Cash Transfer Implementation Guide](#)

Overseas Development Institute (2016) [Cash transfers: what does the evidence say? A rigorous review of programme impact and of the role of design and implementation features](#)

Mercy Corps (2015) [Cash Transfer Programming Methodology Guide and Toolkit](#)

UNHCR, CALP, DRC, OCHA, Oxfam, Save the Children, and WFP (2015) [Operational Guidance and Toolkit for Multipurpose Cash Grants](#)

UNHCR (2015) [Guide for Protection in Cash based Interventions](#)

WFP (2014) [Cash and Vouchers Manual. Second Edition 2014](#)

## CARM guidance

Mercy Corps (2020) [Community Accountability Reporting Mechanism \(CARM\) Policy](#)

## Annex B: Survey checklist and script

The following checklist and sample language are translated from VenEsperanza partners' field guide and scripts for surveyors, indicating key steps and instructions involved in explaining the survey to a potential participant, herein called the "respondent".

- Explain that today a survey will be conducted in order to determine whether or not the respondent is eligible for possible humanitarian aid.
- Explain the survey duration (about 40 minutes), describe the type of questions you will ask, and clarify that the survey assesses whether the household may be eligible to participate in a humanitarian assistance program. **DO NOT MENTION THAT THE PROGRAM DELIVERS CASH.**
- Tell the respondent that it is important he/she knows the information of all the members of the household and has the ID of each household member. If someone in the household is undocumented, the respondent will be able to indicate this later in the survey. Tell the respondent that he/she must be sure that all information provided is true and that follow-up visits may be made to verify the accuracy of responses. Explain that if the respondent includes people in the household who do not live with him/her, uses documents from third parties or relatives residing in Venezuela, or responds deceitfully, he/she may lose the possibility of receiving humanitarian aid.
- Explain that taking the survey does not guarantee participation in the humanitarian aid program and that this exercise is only meant to assess the possibility of taking part in the program.
- Explain that the possibility of being part of the program does not depend on any particular person or profile, but that the system and the survey itself will determine this possibility.
- Tell the respondent that it is important they provide their correct contact details and **INFORM US OF ANY CHANGE**, because if we cannot contact them within 120 days, the survey will no longer be valid and they will not be able to receive humanitarian aid. Repeat that taking the survey does not guarantee that the respondent will receive humanitarian aid.
- Ensure the respondent has the consent and authorization of all household members for their inclusion in the survey. Inform the respondent that if we find any household member registered without his/her consent, it could have consequences for program participation.
- Explain that for this reason it is important that the respondent provides truthful information about his/her situation and that of his/her household.
- Ask if the household or any member has previously participated in humanitarian aid programs with the VenEsperanza Consortium (or any of its partners: IRC, MC, SC and WVI), with the Cash for Urban Assistance Consortium (or any of its partners: NRC, DRC and ACH) or with the WFP (or implementers: WVI, Samaritan's Purse, or the International Red Cross).
- Explain the de-duplication process and indicate that no household may receive humanitarian aid more than once. Specify that if a duplication is detected, that household will not be eligible for aid.

### Sample language from VenEsperanza's survey implementation scripts:

- "This survey is about your current situation. It does not guarantee your entry into the program."
- "I remind you that your participation is completely voluntary and having completed the survey does not mean that you will automatically receive humanitarian aid. Please be very attentive to your phone because if you are selected, we will contact you by phone".
- "You have just completed a survey. This does not mean that you are a participant in the program. The organization will carry out an internal review processes and then we will notify you if you will be continuing in the process."
- "Keep in mind that we will also be checking if you have received humanitarian aid from another organization. If that is the case, you will not be enrolled in this program."

## CONTACT

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### About Mercy Corps

Mercy Corps is a leading global organization powered by the belief that a better world is possible. In disaster, in hardship, in more than 40 countries around the world, we partner to put bold solutions into action — helping people triumph over adversity and build stronger communities from within. Now, and for the future.



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