

CASH ASSISTANCE IN LEBANON

ACCOUNTABILITY TO AFFECTED POPULATIONS (AAP)



RESEARCH REPORT ON AAP IN THE WORLD FOOD
PROGRAMME'S MULTI-PURPOSE CASH PROGRAMME

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CAMEALEON

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The Cash Learning Partnership

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This report presents the research into factors affecting accountability to affected populations (AAP) in relation to the World Food Programme's (WFP) multi-purpose cash programme for refugees in Lebanon, and is the product of the efforts of several people and organisations. Data collection for this paper took place in February 2019.

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Cover photo:

A WFP MPC programme cash recipient in her settlement in Bekaa. She came to Lebanon with her children in 2013 and has received MPC since Aug 2014 (through UNHCR since 2014, and WFP since 2018).

Photo: Adrian Hartrick

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EXECUTIVE SUMMARY

The international humanitarian response to the devastating Syrian refugee crisis in Lebanon has grown steadily since 2011 and, today, cash and voucher assistance (CVA) comprises over a third of this assistance. The World Food Programme (WFP) started implementation of its multi-purpose cash (MPC) programme in late 2017, providing assistance for 23,000 severely vulnerable Syrian refugee households. The MPC assistance is delivered through joint delivery systems shared with other actors, including UNHCR and UNICEF.

There is a need to generate evidence on how CVA innovations and operational models are working in practice, including from the perspective of recipients. This report presents research into factors affecting accountability to affected populations (AAP) in relation to WFP's Lebanon MPC programme to contribute to strengthening the programme, as well as wider sectoral learning on AAP of cash assistance delivered at scale.

Employing a mixed method approach of desk reviews, stakeholder consultations, and analysis of primary and secondary data, this research set out to answer three key questions:

1. Through the lens of WFP, how does a large-scale MPC programme deliver AAP?
2. How do the accountability mechanisms within the programme deliver protection mainstreaming?
3. How do accountability and protection mainstreaming within the programme compare to relevant global benchmarks/best practices?

There is no definitive global benchmark regarding AAP commitments in CVAs and an absence of global guidance tailored to large-scale cash delivery. This research builds on the Inter-Agency Standing Committee Principals' commitments and the Core Humanitarian Standards through the consideration of agency and programme-specific guidance, as well as lessons from implementing accountability mechanisms on large-scale humanitarian CVA and social protection programmes.

Seen within the specific operating context for WFP's MPC programme in Lebanon, research and analysis revealed a number of important findings.

Leadership: WFP is making demonstrable investments to build its AAP capacity in line with international best practices, which have potential to add value to the MPC programme for the benefit of WFP and those it aims to serve. Donor support is also vital to ensure commitment to AAP.

Communication with communities: SMS is the primary and most effective channel for disseminating core information to communities, and SMS messages are generally well understood by the target group. The main challenge for communities is the gaps in information provided, in particular on programme duration targeting, neither of which have been pro-actively communicated.

Complaints and feedback mechanism: The call centre is widely used, and its existence is appreciated. However, refugees face difficulties in accessing the call centre due to call costs and perceived long wait times, and satisfaction with responsiveness varies depending on the issue. Other face-to-face complaints and feedback channels exist but are not fully functional or consistently communicated to communities.

Participation: Limited opportunities for face-to-face interaction can contribute to feelings of disempowerment and dissatisfaction among refugees.

Protection mainstreaming: Recipients face some difficulties in accessing their cash transfers through ATMs, but are employing a range of strategies to effectively manage these issues. There is some evidence of protection risks for recipients, especially those relying on third parties for withdrawals, including risks of coercion and exploitation by others in the community, including landlords and shopkeepers.

Coordination: The limitations in the current data sharing between UNHCR, which manages the call centre, and WFP curtails WFP's access to programme data, and means call centre data is not being used to its full potential to inform programme design. Cooperating partners, as the main interface with communities, can add value to AAP efforts if effectively included in strategic programme management discussions and decision-making.

This report concludes with a number of recommendations to complement AAP related investments and initiatives already underway, including these key recommendations:

- Provide top line information on MPC targeting at the same time that beneficiaries are now (since March 2019) informed about the duration of assistance, highlighting that limitation in funds means not all eligible households can be supported.
- Reduce costs associated with accessing the call centre, such as promoting the existence of the call back facility.

- Follow up with call centre callers to close the loop, even when issues cannot be effectively resolved.
- Collaborate with the 'hotspot' bank branches on crowd control, allowing oversight of protection issues.
- Continue to develop and expand the use of refugee advisory groups as a channel for community participation, and invest in communicating their existence and their role to communities.
- Improve beneficiary confidence in managing transactions through practical demonstrations of ATM use to reduce reliance on third parties.
- Systematically capture refugee issues and feedback shared with NGOs.
- Prioritise the establishment of data sharing agreement between UNHCR and WFP for greater oversight of data on WFP MPC recipients, including information collected through the call centre.
- Further investment in face-to-face channels, and outreach and qualitative monitoring capacities.

INTRODUCTION

Background and rationale

Cash and Voucher Assistance (CVA) is transforming the way that humanitarian assistance is implemented, as it becomes an increasingly common modality to deliver relief across sectors. In recent years, donors and implementers globally have made major commitments to scale up the use of, and increase the efficiency and effectiveness of, CVA. In a context of the increasing frequency, complexity and protracted nature of humanitarian crises, where needs are outstripping available funding, new ways of delivering CVA at scale is being explored. This includes the consolidation of sectoral assistance through multi-purpose cash (MPC) grants and new operational models to improve the value for money of programmes. Many of these models are also leveraging digital technology to achieve economies of scale.

At the peak of the Syrian refugee crisis, Lebanon was hosting some 1.5 million Syrian refugees.¹ Protracted displacement and lack of employment opportunities means the poverty of refugee households has increased and many are resorting to negative coping strategies detrimental to their development and wellbeing. The international humanitarian response to the crisis has grown year on year since 2011, during which time CVA has evolved to represent over a third of the response.

In 2014, 30 organisations were directly providing CVA for at least 14 different objectives, with many households receiving different transfers through different payment channels. Efficiency and effectiveness were seen to be reduced due to the fragmentation of assistance and there have been various attempts to increase the harmonisation of, and to streamline, CVA.²

As a result, there was a decision made by some donors to consolidate transfers through the adoption of MPC, which has made up the majority of CVA distributed to refugees since the end of 2016. World Food Programme (WFP) introduced MPC in late 2017. Currently, MPC makes up 36 percent of WFP's monthly loading in terms of USD amount. The cash assistance is provided alongside other transfers targeting specific needs – notably WFP's food assistance (cash and vouchers) and United Nations High Commissioner for Refugees' (UNHCR) winter transfers. Operationally, movement towards joint programming

approaches has taken advantage of the sophisticated banking and telecoms sectors to leverage digital solutions. This has included development of the Common Card facility with Banque Libano-Fran aise (BLF) in 2015 for use on all cash programmes and managed by WFP, and a joint data-driven targeting approach in 2016, which includes a proxy-means test (PMT) managed by UNHCR. In 2016, WFP and UNHCR, in collaboration with United Nations International Children's Emergency Fund (UNICEF), devised a broader collaborative model for harmonising CVA operations: The Lebanon One Unified Inter-Organisation System for E-Cards (LOUISE), which builds on the above joint processes according to the comparative advantages of each agency, whilst maintaining separate programmes.

As of 31 August 2019, 924,161 Syrian refugees were registered with UNHCR.³ This number does not include 'recorded' refugees, those that entered Lebanon after 2015. According to the 2018 Vulnerability Assessment of Syrian Refugees (VASyR), 51 percent of Syrian refugee households live below the Survival Minimum Expenditure Basket (SMEB) of \$2.90 per person per day, unable to meet survival needs of food, health and shelter. Since late 2017, WFP has been implementing a multi-donor funded MPC programme to provide cash assistance to cover food and non-food essentials for severely vulnerable Syrian refugee households. Implementation of the programme is conducted through the LOUISE platform, using the Common Card facility and joint targeting based on PMT. A joint complaints and feedback mechanism under LOUISE has been under discussion since 2016 and is still in development. In January 2017, WFP joined UNHCR's call centre and is still making use of it.

An independent monitoring, evaluation, accountability and learning component complements WFP's MPC programme. The Cash Monitoring, Evaluation, Accountability and Learning Organizational Network (CAMEALEON) was created with the aim of strengthening programme quality through research, learning and recommendations. CAMEALEON is a consortium of NGOs (NRC, Oxfam and Solidarités International), with several partners including the American University of Beirut, Economic Development Solutions, the Cash Learning Partnership (CaLP) and the Overseas Development Institute.

4 1 Lebanon Crisis Response Plan 2017-2020 (2019 update)

2 CaLP (2018) State of the World's Cash Report: Cash transfer programming in humanitarian aid. Oxford: Cash Learning Partnership.

3 UNHCR Operational Portal, Lebanon: <https://data2.unhcr.org/en/situations/syria/location/71>

The operational systems used to implement this MPC programme are also being used to implement a range of other CVA programmes targeting severely vulnerable households. This includes:

- The MPC programme of UNHCR (providing \$175/month), targeting 33,000 households in 2018-2019.
- WFP's direct food assistance (\$27 per person per month, either as cash assistance or as an e-voucher valid with registered retailers), provided to all UNHCR's MPC recipients and to other severely vulnerable households that are not benefiting from any MPC.
- UNHCR's annual winterisation grants, provided to all severely vulnerable households (167,367 households)⁴.

Several innovations in the operational model for cash delivery in Lebanon offer potential benefits. This includes increasing efficiency and effectiveness of CVA, improving ability to deliver assistance at scale, and improving accountability to affected populations (AAP), by simplifying delivery of assistance (one card, one hotline) and enabling better, more responsive programming. On the other hand, these ways of working could also create barriers to achieving AAP in practice, for example in relation to communication of information and how feedback is provided and processed.

There is a need to generate evidence on how such innovations and operational models – which are being tried and tested for the first time – are working in practice, including from the perspective of recipients, to inform their future roll out. In addition, it is important to acknowledge that AAP work is highly challenging, particularly in a protracted crises situation like in Lebanon, where an estimated 195,000 Syrian refugee households continue to lack sufficient resources to cover their essential needs, and where there is only sufficient funding to provide MPC to less than one third of households classed as severely vulnerable.⁵ Most households have depleted their savings, humanitarian services are strained, livelihood opportunities are severely limited, and 90 percent of people depend on debt or credit to cover basic needs.

Research summary

As a CAMEALEON partner, CaLP conducted this research to better understand the accountability benefits and issues arising from this way of delivering cash at scale in Lebanon, identify outlying versus systemic issues, and the benefits and constraints of accountability mechanisms being applied to date.

This research focuses on recognised drivers of accountability in CVA and seeks to answer three primary research questions, guided by a diverse array of secondary research questions:

1. Through the lens of WFP, how does a large-scale MPC programme deliver AAP?
2. How do the accountability mechanisms within the programme deliver protection mainstreaming?
3. How do accountability and protection mainstreaming within WFP's MPC programme compare to relevant global benchmarks/best practices?

Findings and recommendations will be used by WFP, CAMEALEON, UNHCR and the broader humanitarian community to improve accountability of CVA implemented in Lebanon, with the goal of informing global discussions concerning implementation of new operational models for delivering cash at scale from an accountability perspective.

Methodological approach

The methodology followed during this research comprised a mixed method approach:

- Desk review of accountability best practices, standards and approaches in humanitarian aid and CVA for the purpose of answering research question 3 and defining the areas of focus for the first two questions. Key source documents included sector-wide standards and guidance, WFP organisational approaches, agency standards and guidelines, and lessons and experiences from programming.
- Desk review of available programmatic documents/ data and other relevant contextual and programmatic materials sourced through direct requests to organisations in country.
- Remote stakeholder consultations to help build understanding of WFP's MPC programme design and operations, accountability mechanisms, the coordination and joint programming with UNHCR, and the operating context for and evolution of AAP and protection mainstreaming activities in the Lebanon response and within WFP/UNHCR.
- Analysis of existing secondary data gathered in CAMEALEON's Survey on the Multi-sector Impact of Cash Assistance on Syrian Refugee Households; Ground Truth Solution's refugee perceptions survey in Lebanon; and WFP and UNHCR call centre data.
- Primary data collection and analysis through 42 key informant interviews (KIIs) across a range of agencies, and 80 focus group discussions (FGDs) with existing or recently discounted recipients of MPC in four locations in the Bekaa region: Bar Elias, Karak Nour, Kfar Zabad and Majdel Aanjar.

4 22 February 2019 BAWG presentation

5 27 August 2018 BAWG presentation

Confidence in findings

The FGDs generated solid consensus on many of the topics discussed, across locations, groups and gender. The results consistently align with findings presented in the desk review. The findings were also substantially triangulated in the KIs. This, and the centralised and standardised design of the MPC programme (common messages, communications channels, common complaints and feedback mechanisms) mean we can be confident that, even though the FGD sample is not representative, the majority of critical findings (both positive and negative) are likely to be common across the programme, at least for the Bekaa region, where 85 percent of WFP's recipients reside⁶. Findings relating to protection risks may be more indicative, since risks are context-specific and will vary between locations.

This research may not have adequately captured the views of extremely marginalised households due to difficulties in identifying FGD participants who are particularly isolated and socially marginalised.

UNHCR MPC recipients were not included as CAMEALEON's focus on WFP's MPC programme.

Conceptual framework and lens for analysis

Achieving AAP - global concepts

Key findings of the desk review on accountability best practices, standards and approaches in humanitarian aid and CVA informed the scope of the research and identified commonly accepted standards for AAP to serve as a benchmark for research question 3.

The Inter-Agency Standing Committee (IASC) Principals' joint endorsement of five commitments to AAP is commonly taken as the standard for the aid sector and underpins the research framework.



The Core Humanitarian Standards (CHS), while not officially adopted by the IASC Principals, are nevertheless widely endorsed and influential. Two of the nine CHS standards (standards 4 on rights and access to information, and standard 5 on access to complaints mechanisms) are relevant to the research framework.

These global standards effectively orient AAP actions around three key components:



WFP's AAP policy also adopts these as the core areas of focus for achieving AAP within its programming. As such, these three components comprise the core focus of this research.

Conceptual and operational linkages between AAP and protection mainstreaming

The Sphere Protection Principles encompass the basic elements of protection in a humanitarian response. They underpin four key elements of protection mainstreaming endorsed by the Global Protection Cluster, to be considered in all humanitarian activities:

- Prioritise safety and dignity, and avoid causing harm
- Meaningful access
- Accountability
- Participation and empowerment

There are similarities in the core components for achieving AAP and those for protection mainstreaming. The IASC highlights that there is often "significant overlap between actions undertaken in pursuit of protection mainstreaming and those designed to ensure meaningful and effective accountability to people affected by crisis. While not identical, these goals are fundamentally linked, and should be approached as essential, complementary and mutually reinforcing components".

These linkages between AAP and protection mainstreaming mean there are several ways in which AAP mechanisms on a programme can support delivery of protection mainstreaming objectives. Just as with any programme process, if these are poorly designed or implemented, accountability mechanisms also have potential to contribute to protection risks. These linkages form the lens for analysis for research question 2 on how accountability mechanisms within the programme deliver protection mainstreaming.

Benchmarking - implementing AAP in practice

There is no definitive global benchmark outlining the precise actions needed to implement these AAP commitments in aid programmes/CVAs, since context plays a major part. Published guidance on operationalising the IASC Principal's commitments and the CHS do highlight some actions and associated indicators for the level of the response. However, they are couched broadly to be relevant across sectors and contexts, with less focus on the specifics of what mechanisms should look like or how they should be designed and implemented. Instead, they highlight various generic actions and considerations that provide a useful framework for analysis. This analysis builds on these through the consideration of agency and programme-specific guidance, as well as lessons from experiences of implementing accountability mechanisms on large-scale humanitarian CVA and social protection programmes. A key resource has been the detailed evaluation of the Emergency Social Safety Net programme in Turkey implemented by WFP, which is also providing MPC at scale to Syrian refugees⁷. This evaluation highlights common principles and good practices to guide design and implementation of specific AAP mechanisms, as well as common challenges experienced, and presents a solid basis for assessing AAP practices on the MPC in Lebanon.

While such best practices from international guidance and experience provide an important basis for analysis, these must be understood within the specific operating context for WFP's MPC in Lebanon, which will influence the relevance and appropriateness of these practices as well as the ability of actors to implement them effectively. Regarding research question 3, the analysis presented in this report, and interpretation of the programme-level issues, best practices and constraints identified, has been undertaken with reference to:

- The enabling environment for AAP and protection mainstreaming – including within WFP, the basic assistance sector, the Lebanon response, donors, and government.
- The scale of the programme – including the inevitable need for trade-offs between scale, efficiency, recipient visibility, and control/oversight of implementers, and the extent to which operational processes tailored for mass inclusion can (or should) be adapted to cater for special needs.
- The nature, and extent, of linkages with UNHCR's MPC assistance – including the delivery of separate cash programmes in the same community; the layering of WFP's food assistance with UNHCR's MPC; the use of some common delivery and accountability systems; and the harmonised, but not integrated, messaging – and whether and how these influence accountability processes or recipient experience.



RESEARCH FINDINGS

This section highlights the key findings of the global desk review and presents the primary research findings for each of the research focal areas, underlining where they align with other studies.

Leadership and capacity

KEY DESK REVIEW FINDINGS

Good practice

Recruit dedicated AAP and protection roles.

Undertake capacity assessment of programme staff and partners regarding AAP/protection.

Include AAP in partner selection processes.

Adequately sensitise Q&A officers/frontline staff on the programme's key messages.

Build appropriate skills in frontline workers including those receiving queries and complaints (listening and interview skills, demonstrate empathy etc.).

Deploy enough staff to manage AAP functions (communications, CFM).

Carry out and regularly update protection risk analyses.

Establish detailed guidelines/SOPs and performance standards to ensure consistent implementation of AAP activities.

In 2018, WFP's senior management in Lebanon endorsed the creation of a dedicated unit for AAP and Protection under its programme division, which leads on communication with communities, managing WFP's responsibilities on the joint call centre, handling complaints response, and protection mainstreaming. Cooperating partners on the MPC programme now report regularly to WFP on protection risks.

Programme donors are committed to strengthening AAP of the MPC programme. Broader efforts of the Basic Assistance Working Group (BAWG) to build capacity for and improve AAP and protection mainstreaming efforts across the sector are complementing these internal actions. Accountability and protection experts in UNHCR led capacity assessments, reviewed the sector response strategy, and trained BAWG members in tools for risk analysis. Sector-wide operational commitments and performance indicators are currently being developed.

This capacity is enabling greater AAP efforts

WFP key informants at programme and senior management levels were appreciative of investment in the AAP unit. There was agreement that this has potential to add value to programming, for WFP and for recipients. Several examples show how it is already contributing to positive changes with potential to improve AAP:

- Commissioning an inclusion analysis to better understand AAP risks and barriers for vulnerable groups
- Increased staff capacity to analyse protection risks
- Increasing efforts to close the loop with complainants
- Planning to improve management of complaints referred to third parties
- Improving call centre screening and categorisation processes
- Planning for increased oversight of the call centre functions

These investments are increasing WFP's understanding of AAP issues on the programme, which is a necessary precursor to addressing them. There are inevitably still challenges that WFP faces in improving AAP in practice, despite clear willingness and appetite to do so, most importantly the reality that building capacity and operationalising changes is an incremental process that takes time. Limited budgets mean compromises are necessary, and the programme's operational setup hampers WFP's ability to understand or address issues, since WFP does not manage the call centre or the software, and has no contractual relationship with bank branches managing ATMs where beneficiaries redeem their assistance. Any challenges that are presented in this paper must be understood in this light.

Donor support is vital but there are potential upward accountability pressures

Globally, AAP is a topic of increasing interest to donors, which has translated into demonstrable support on the MPC in Lebanon, including budgetary allocations for investments in AAP expertise and mechanisms, inclusion of AAP in performance indicators and as a topic in donor coordination meetings concerning progress and performance of AAP mechanisms. Donor support can be considered a prerequisite to ensuring effective commitments to AAP on the programme.

Analysis also identifies factors that could limit effectiveness of donor leadership in this space. Implementing good practices in AAP requires investment, and while there is clear commitment to improving AAP, there is also a lack of guidance from the major cash donors, globally, on what level of investment in AAP is 'good enough', or critical thinking on the value for money of such accountability investments.

Communication with communities

KEY DESK REVIEW FINDINGS

Good practice

- Map and consider the merits of a variety of communication channels.
- Provide full information on the mechanism and processes associated with receiving assistance (duration, value, frequency, eligibility etc.)
- Use more than one communication channel to maximise coverage
- Select channels and create messages based on access, cost, preferences, experience, trust, and protection risks.
- Where new technology is used, provide support for those who may struggle with access (for example due to age, gender, literacy, location, etc.).
- Monitor the effectiveness of communication.

UNHCR has conducted various studies on communication practices of refugees that highlight the potential of phone-based communication, given increasing levels of phone ownership and stated preferences of refugees. The 2018 Communication with Communities in Lebanon survey revealed ownership of 94 percent, and 93 percent of respondents stating a preference for mobile/SMS communication when receiving information. Still, surveys also highlight the significance placed on receiving information through more traditional face-to-face channels, especially for older persons.

UNHCR and WFP concluded that phone-based communication would be the most efficient and effective for timely communication at scale. The primary channel for actively communicating core information about the programme is SMS, and recipients as well as non-recipients can also contact the call centre for information.

UNHCR has linked with existing refugee-managed social media groups, and some information about the MPC programmes is posted there. WFP used to have a Facebook page for communication with refugees, and is considering re-establishing social media channels under the AAP unit.

Some investment in more traditional communication channels, such as WFP and partner staff interaction at reception centres and distribution and validation sites, as well as the distribution of leaflets, complement the mobile communication channels. Joint Q&A sheets, in Arabic and English, are drafted for both MPC programmes and shared with cooperating partners as well as other NGOs.

Up to March 2019, recipients were not proactively informed about the duration of the MPC assistance, but could find more information by contacting the call centre. This was to avoid setting expectations among recipients of 12 full months of assistance, as well as the risks of creating political and social tensions.

Annual SMS messages (on the MPC programmes and WFP's food assistance) inform households whether they are eligible, but do not provide information about the targeting method or variables used for this decision.

Recipients can seek further information with helpdesk staff at validation sites or with the call centre, but information can be inconsistent and incomplete. This is partly due to the complex Desk Formula targeting method, but also concerns among UN agencies that revealing variables could lead to fraudulent claims for assistance, or households taking extreme measures to fit the criteria such as having more children.

WFP and UNHCR send separate messages each month to their respective recipients. WFP's MPC recipients receive food assistance and MPC from the same agency and through the same modality (cash assistance on the ATM wallet) and receive only one message a month when their assistance is uploaded to their card. For UNHCR MPC recipients, the separation of MPC from food assistance grants (provided by WFP), and the modality that provides it (MPC cash assistance through the ATM wallet versus food assistance through the combo wallet) means recipients receive separate messages about these transfers, though there is close coordination between agencies on the content of messages. Winterisation messages are also sent separately.

SMS is the most effective information-sharing channel, despite some issues of access

Of the FGD participants, over 75 percent of households reported having access to a phone within the household, and others relied on the phone of a family member or other member of the community to receive programme messages.

WFP and UNHCR reported that changes to recipient phone numbers had been an issue early in the programme, contributing to key SMSs not being received. According to WFP, this problem has since reduced as awareness of the importance of programme SMS communication steadily grows among the affected population, although it does still persist. 25,000 people reportedly called to update their contact details between July and December 2018.

FGD participants were resoundingly satisfied with the SMS mechanism. Even though illiteracy rates of refugees are particularly high in the Bekaa region, people understand the key messages received about the programme (concerning validation, distribution, loading date, value, where to get it, and how to complain). Household or community support was considered effective in ensuring wide understanding of the messages. WFP's own FGDs, undertaken as part of programme monitoring, has consistently found the same, as has WFP's inclusion study. Those who receive multiple messages to their phones on behalf of more than one recipient reported that they were able to effectively match the message to the correct recipient through the case number. CAMEALEON's impact survey revealed that over 90 percent of respondents reportedly received information about their assistance through SMS and over 98 percent of respondents reported that messages are easy to understand.

One limitation with the SMS channel is the requirement that phone lines must be continually topped up with credit. While the SMSs are free to receive, recipients who are phone

owners incur a monthly cost in order to keep the line active. Most male FGD respondents reported using WhatsApp, and some are using Facebook. Refugees consider these to be effective channels for dissemination, but note that certain groups could face challenges of access (e.g. women, elderly, and households that cannot afford the cost of data).

Gaps in information-sharing are a major barrier to achieving AAP

FGD participants were unanimous in stating that they were unaware of the duration of MPC assistance, of the reasons why they were initially included in the programme, or the reasons for their subsequent continuation or discontinuation. This finding is consistent with some WFP monitoring data and WFP's inclusion study, and KIIs with NGOs conducted for this study.

Having communities fully informed about programmes is vital for achieving accountability. Lack of knowledge of the duration of assistance limits recipients' ability to make informed financial decisions and may lead to decisions or coping strategies that are not in their best interests. FGDs highlighted a real risk that this lack of information is causing harm, where participants highlighted that they, or others in their community, had taken on debts that they could not pay back due to being unexpectedly discontinued. There was unanimous feedback that the lack of understanding of targeting is contributing to community tensions between the perceived 'winners and losers' of the targeting exercise. This is consistent with findings of the CAMEALEON NGO survey and WFP's own FGDs undertaken as part of programme monitoring, as well as Ground Truth Solution's refugee survey, where 73 percent of respondents, which included Syrian refugees and Palestinian refugees, who are assisted through different programmes, had negative perceptions of the fairness of targeting in the Lebanon response.

WFP's decision to switch households from cash-based food assistance to food vouchers without explaining why, was another issue raised during the FGDs. Participants expressed a universal preference for cash and frustration with the voucher assistance.

Not everyone in the FGDs was clear about the need to regularly update changes to their household circumstances with UNHCR – something which could affect targeting decisions and (if at significant scale) could impact on the accuracy of targeting.

Complaints and feedback mechanisms

KEY DESK REVIEW FINDINGS

Good practice

Use more than one channel for raising feedback/complaints, to maximise reach.

Select channels based on ease of access, preferences, experience, trust, cost, inclusion, and protection risks.

Minimise costs of access (phone lines should ideally be toll-free).

Where new technology is used, provide support to those who will struggle (age, gender, literacy, location etc.).

Consider the need for face-to-face channels as well as technological platforms, for meaningful engagement.

Where illiteracy is high, include channels that allow verbal reporting.

Inform the complainant on any follow-up and timeline, and whether their complaint is out of the scope/unable to be addressed.

Clearly categorise the nature of the complaint and log all actions and subsequent follow up actions.

Ensure protection related issues such as SEA are handled by appropriately trained staff.

Referral pathways and escalation procedures to ensure critical complaints are appropriately dealt with.

Close the feedback loop to build trust - even when the complaints cannot be addressed.

Include an appeals mechanism to reconsider 'borderline' cases of exclusion.

Ensure feedback data from all sources (including that received in the course of daily interaction), is regularly and systematically analysed to inform program design and implementation.

The decision to use a phone-based channel as the primary way for communities to feedback was based on research of refugee communication practices and prior experiences of early cash programmes in Lebanon, where hotlines have been effectively used for years. Toll free lines are not available to organisations outside of government, and refugees must pay to call.

Callers hear an automated answering message upon connection and enter a 'call waiting' system. For callers who enter the line but then disconnect/discontinue the call, the system can retrieve caller ID so staff can make outbound calls to reach these cases. It is a requirement of the operational procedures to call back any refugee who mentions in the call that they are running out of credit. Customer service operators follow a precise script and are responsible for dealing with information requests and logging issues, according to predefined categories, for referral to the appropriate teams.

UNHCR manages protection-related issues, and WFP manages card and PIN related issues. For WFP and UNHCR caseloads, WFP can only access and export the call centre records and data pertaining to those issues that it is tasked with addressing.

The emphasis of WFP (and UNHCR) has been on establishing a central, single channel for receiving complaints, for reasons of simplicity and scalability, and it is the call centre that is continually promoted with communities. Still, there are other channels available through which refugees could report issues with the programme, including email, partner staffed helpdesks and UNHCR reception centres. UNHCR employs an analyst to screen and analyse trends in refugee-managed social media pages and shares reports with WFP, and efforts are made to ensure that data from all these channels is included in WFP’s analysis of complaint and feedback data – though this is essentially a manual process since systems are not integrated.

Besides the call centre, recipients are provided with the phone number of BLF to report card and PIN issues, particularly in the case of lost and stolen cards. The bank handles such issues independently and WFP has no oversight of service quality, or access to data on the number or resolution of issues.

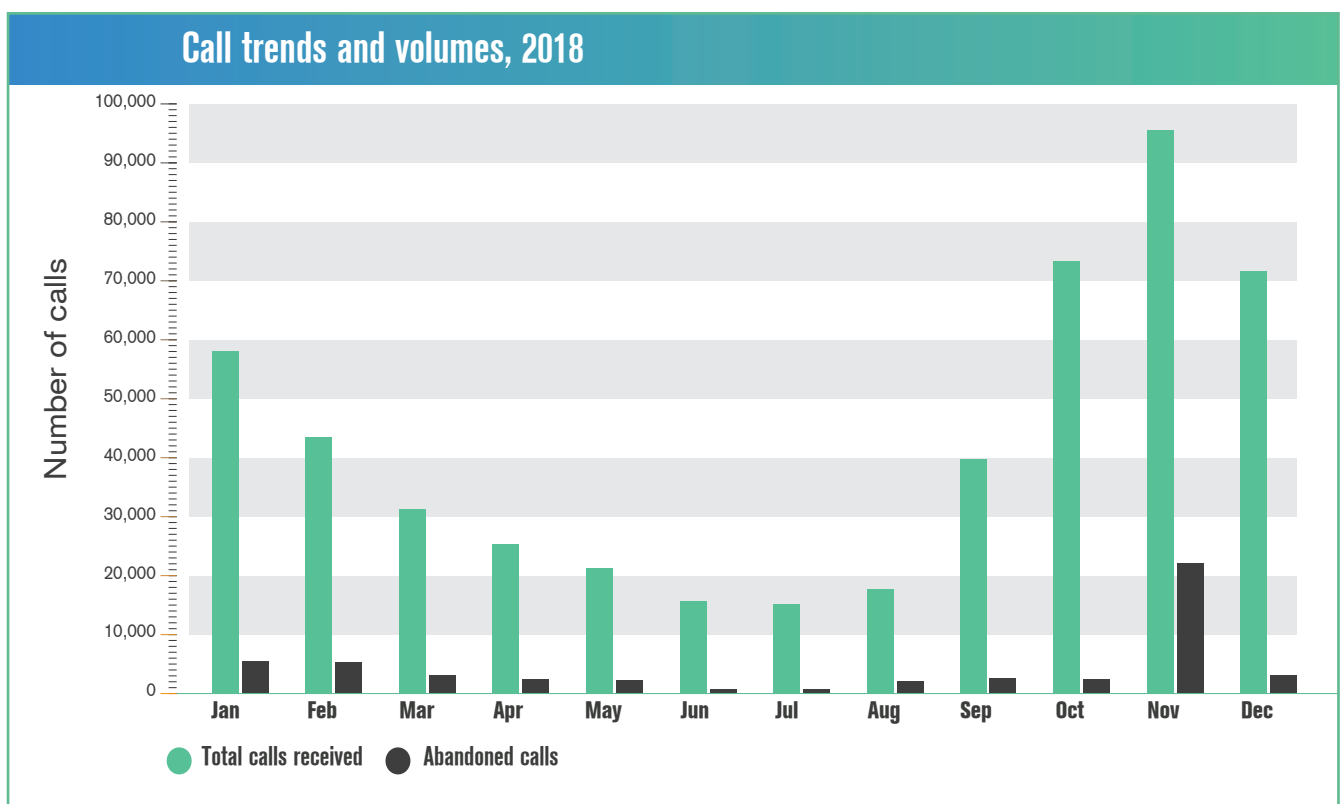
In 2018, in acknowledgement of the imperfect nature of targeting, a grievance redress mechanism (GRM) was set up on the two MPC programmes with the aim to complement and address gaps in the targeting approach and reduce targeting errors.

Refugees like the call centre in principle, but can face issues when accessing

A phone-based channel to manage complaints and feedback is highly relevant to the context and the nature of the crisis. FGD participants reported being comfortable with the channel and happy with the principle of a hotline for raising issues. It is simpler and more convenient to have a single number to call for all MPC and food assistance queries.

Around half of FGD participants said their household had made use of the call centre at least once, including those without access to their own phone. Similarly, data from the call centre highlights the high volumes of calls received each month, with over 1.06 million calls received in 2017 and 2018 (including multiple calls from the same household from both recipients and non-recipients).

On average, 10 percent of calls connect to the line but are not answered. Reasons for these callers hanging up or being cut off will vary, but a major issue emerging in FGDs was refugees’ perceptions of the accessibility of this service when they do try to call. The main problem cited was the cost of making calls related to complaints about lengthy waiting times to speak to an operator, during which time they lose credit. This was similarly reported in CAMEALEON’s NGO survey and in KII with NGOs, and is reflected in WFP’s call centre data illustrating that the number of abandoned calls go up as waiting time increases.



FGD participants consistently cited the waiting time as around two or three minutes, though it should be noted that the call centre data shows total waiting times varying from 22 to 47 seconds. Still, this perception of inaccessibility is real and affects the utility of the call centre as a channel for providing feedback or receiving information.

While most male FGD participants had called the line directly, most women and elderly participants reported that they relied on a third party to make the call. There were similar findings in WFP's inclusion study, reflecting a lack of confidence in using the technology linked with cultural factors.

Being unable to connect to the line was another issue – though less reported, and significantly more of an issue in Mount Lebanon and North Lebanon than in Bekaa.

Managing call volumes

UNHCR scales up call centre capacity in months of peak demand (the months following delivery of the targeting SMS, Sep-Dec). In these months, despite the higher call volumes, there are fewer abandoned calls (with exception of November 2018 where the highest ever number of calls was received), suggesting that capacity increase has been mostly successful, but could also reflect that callers in this period choose to stay on the line and incur the costs because their issues are more urgent.

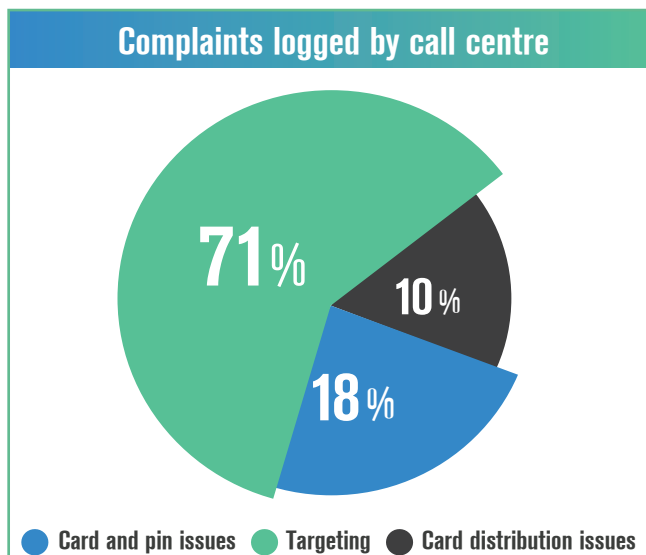
The call back facility is a potential mechanism to overcome these challenges of cost and wait time. Refugees can request a call back in two ways, either using the interactive voice response menu system during the automated answering message upon connection, or asking the operator. However, these options are not communicated in the information disseminated to refugees and there was limited awareness of these options among FGD participants. Still, UNHCR data shows that the call back option has been widely used, with over 31,000 outbound calls per month on average, accounting for around 28 percent of operators' call time on average. The call centre manager reported that the effectiveness of the call back system was constrained for several reasons:

- Lack of capacity of operators to deal with large volumes of call backs in a timely way, especially in months of peak usage.
- Difficulty in reaching people (partly due to delays in scheduling call backs due to the first issue).
- Inability of the call management system to screen for those cases where the refugees subsequently called back again themselves, leading to duplications.

In early 2019 UNHCR removed the call back option from the automated menu system, pending planned improvements to the system to address these problems. It was subsequently reinstated to return calls on Saturdays according to the Food Security Working Group meeting, 11 September 2019.

Main types of complaints

Analysis of WFP's call centre data from November 2017 to October 2018 shows that complaints logged about targeting represent a significant portion. These calls are concentrated in the months following the SMS communications about eligibility and the month of and following discontinuation (Sept-Dec). There are similar findings in CAMEALEON'S impact survey where almost 54 percent of respondents said that targeting queries and complaints were the main reasons, they had used the call centre line.



Further investment in other complaints channels would complement the call centre

The face-to-face channels through which WFP can potentially receive and respond to complaints could be improved. The helpdesks, though available at every distribution and validation point, have not been widely publicised, and cooperating partner data suggests few issues are being logged there in practice. A more systematic or automated system to regularly integrate and combine complaints and feedback received through these other channels could improve efficiency and lower the risk of complaints being lost. WFP is planning to develop an integrated ticketing system to address this. Other NGOs also receive large numbers of queries from households, especially about targeting. As flagged in the CAMEALEON NGO Survey Report on Changes to Cash Assistance, there is no mechanism to consolidate this information into the complaints feedback mechanism (CFM), which is being lost.

Satisfaction with call centre responsiveness depends on the issue

A key element of an effective CFM is the timeliness of issue redress and ensuring that all complaints – even where no action can be taken – are effectively closed. Ground Truth Solutions' refugee survey shows that the perceived lack of responsiveness of complaint mechanisms is a critical issue across the Lebanon (cash and non-cash) response as a whole, with 90 percent of those who had filed a complaint reporting that they had not received a response. Through the AAP team, WFP is actively seeking to improve this issue, for example through introducing procedures to ensure as much as possible that all end users are communicated with and logged issues are closed.

CAMEALEON's impact survey reported that 18 percent of complaints were closed on the same day of the call and 12 percent within a week, but that nearly half of the complaints had still not been resolved. 40 percent of call centre users expressed satisfaction, but a further 44 percent expressed dissatisfaction with their experience of the service. World Vision also reported that around 40 percent of their WFP cash recipients were not satisfied with the call centre. FGDs highlighted differing perceptions of call centre responsiveness, depending on the issues they called to raise. These perceptions are consistent with findings in WFP's call centre response data and the CAMEALEON impact survey.

According to FGD respondents, card and PIN related issues are being satisfactorily addressed, though most people reported waiting two to three months for new cards and PINs. According to WFP, this is largely down to insufficient or inaccurate information being recorded through the complaints logging process, requiring several calls backs, and is an issue that is improving as screening questions and issue logs are being updated. The bank complaint line is not seen to be responsive, with recipients often just referred to the call centre and reports suggesting there may be a lack of consistent or quality service provided to refugees through this line.

FGDs showed that negative call centre experiences are overwhelmingly related to targeting issues as participants feel they are not getting meaningful information, even after multiple calls, on whether or not – and why – they are getting assistance. This is consistent with CAMEALEON's impact survey, where 56 percent of those calling about targeting-related issues felt the issues had not been effectively addressed, and 67 percent considered that their issue had not yet been resolved. FGDs highlighted several issues:

FGDs showed that negative call centre experiences are overwhelmingly related to targeting issues as participants feel they are not getting meaningful information, even after multiple calls, on whether or not – and why – they're getting assistance. This is consistent with CAMEALEON's impact survey, where 56 percent of those calling about targeting-related issues felt the issues had not been effectively addressed, and 67 percent considered that their issue had not yet been resolved. FGDs highlighted several issues:

- Explaining discontinuation or ineligibility to a household in terms of others being 'more vulnerable' can contribute to tensions since there is no visible difference in circumstances.
- The call centre operator can provide some information on targeting methods, but the information callers receive will vary depending on the question the recipient asks.
- What refugees are told during the call can raise expectations ("we will study your file") that they will receive a response of some sort, but this does not happen.

The high number of targeting queries is being raised with the call centre (and elsewhere) firstly because WFP, along with other MPC actors, are not able to provide assistance to everyone who needs it. Furthermore, the minimal proactive communication about targeting or programme duration contributes to the large proportion of targeting related complaints. This overburdens the call centre for a quarter of the year, contributes to the access challenges that other callers experience and is a massive use of resources. Providing clearer information to communities from the outset would significantly reduce the need for contacting the call centre.

WFP is currently pursuing several options with the aim of improving responsiveness of the CFM. This includes the planned creation of a ticketing system to flag delayed complaints and prioritise urgent issues, as well as actively closing the loop on as many calls as possible from January 2019. These actions will help manage issues of card and PINs but cannot resolve the lack of responsiveness to targeting issues.

CFM could contribute more to responsive and quality programming

Some of the issues raised through the call centre have fed into programme management and coordination mechanisms and informed modifications to the MPC and food assistance programme design and implementation, demonstrating the potential value of the call centre as a source of data contributing to continuous improvements in programme quality. However, to make appropriate changes, this requires a detailed understanding of the issue – the underlying reasons why an issue is being faced and how this is having an impact.

UN actors could do more to exploit this potential. WFP understandably needed to prioritise building AAP capacity, and considerable staff time to date has been spent on case-by-case issue resolution, leaving limited time for more macro analysis of (accessible) call centre data. WFP is also restricted in what analyses it can carry out due to the limited access to call centre and recipient data, both managed by UNHCR. The AAP unit has recently begun analysis of available call centre data (such as time for issue resolution, closure rate, etc.) and is discussing having more oversight of call centre activities with UNHCR.

Participation

KEY DESK REVIEW FINDINGS

Good practices

Consult affected populations on needs and preferences for communication and feedback channels, timing and phrasing of key messages, barriers to access for specific groups and preferences for cash delivery systems.

Consult recipients on their experiences engaging with programme processes (communications, registration, enrolment, payment, CFM), satisfaction with service quality, and protection risks.

Undertake studies such as age, gender and diversity (AGD) analyses to understand vulnerability characteristics, needs and preferences of particular groups (including women, elderly, and people with disabilities).

Seek opportunities for meaningful engagement through face-to-face channels and personal interactions to complement technological platforms.

After soliciting suggestions or feedback, always try to close the feedback loop and inform people of changes being made.

The reality of delivering cash assistance at scale in this manner reduces opportunity for direct interaction with target populations as household visits or outreach-type activities into communities are not part of the design. In addition, interaction of cooperating partners with communities is limited to the distribution and validation sessions and these are not currently used for consultation.

Household level monitoring activities include quarterly food security outcome measuring surveys, conducted through cooperating partners, and monthly process monitoring with 100 MPC households. These surveys include some questions about communication effectiveness (knowledge of targeting, call centre, receipt of SMS), issues in using the ATM, and protection issues related to participating in the programme, but do not capture recipient experiences or satisfaction with the communication channels or call centre. WFP FGDs with communities engage approximately 180 MPC or food assistance recipients every quarter and include questions on experiences with accountability mechanisms providing an opportunity to collect further suggestions.

The recent inclusion analysis aimed to understand more about the needs, preferences and experiences of communities, especially particularly vulnerable groups of cash recipients (including women, elderly and people with disabilities). In 2018, UNHCR also established the refugee advisory groups to capture opinions of target populations on how activities are best designed or managed, including how to implement communication around targeting, i.e. SMS and Q&As. For a period, UNHCR used their network of outreach volunteers to seek opinions and suggestions from the population. This was stopped due to concerns about risks to their safety and their role on the MPC programme is now limited to information sharing.

Opportunities for improved interaction with targeted communities

Given the context, scale and caseload of the MPC programme, participatory activities are challenging to incorporate into design and implementation. Still, no FGD participant reported engaging in any participatory or consultative processes relating to the cash assistance, including programme monitoring. Whilst highlighting that they are grateful for the assistance, there was a distinct sense of lack of agency among those interviewed, with several reflecting that they are simply passive recipients with no say in things that affect them. Targeting was one example mentioned, another was the switch from cash to voucher modalities – without consultation or explanation – when everyone preferred the cash option.

This must be seen in the light of a prolonged displacement and the lack of funding to support everyone in need, and it is not necessarily the lack of consultation alone which is creating this feeling, but rather this combined with the lack of access to information, the inability to have their queries satisfactorily answered, and limited opportunity to interact with those implementing the programme. Feedback from FGDs indicated that the opportunity for personal interaction even at distribution and validation sessions is limited.

WFP's experience of engaging with the refugee advisory groups has reportedly been positive and of value to the programme, and assists the AAP unit in gaining better understanding of recipient perspectives and how things may be interpreted. These, or similar groups, are inexpensive to maintain and present one way to seek inputs from the target population.

Monitoring activities also provide opportunities to seek opinions of participants about design and implementation aspects of the MPC programme. A clear finding of this research, and WFP's inclusion study, was how much people appreciated the opportunity to sit with someone and have someone listen to their issues and experiences. The call centre also has potential to support greater participation of refugees in the programme through outbound surveys, a mechanism currently being considered by WFP.

Protection risks

Protection risks experienced during implementation can be reported to the call centre or to a separate UNHCR protection hotline. UNHCR is responsible for investigating and addressing these and other protection-related issues. If the complaint implicates WFP staff or cooperating partners (or shops registered for the food voucher), cases are referred to WFP and dealt with according to internal procedures.

Through reporting from cooperating partners, and its sub-office staff, WFP has been made aware of certain risks, including overcrowding at some ATMs on payment days creating tensions with the Lebanese population, and

difficulties in accessing validation sites due to disability or insecurity crossing checkpoints. Some modifications were made to mitigate the issues identified, for example through spreading out the SMS notifying recipients about payments over several days to stagger ATM use, by moving payment days to not coincide with Lebanese public sector salary payment days, and offering door-to-door validation to people with disabilities.

Anecdotal reports of bank staff treating refugees poorly have been more difficult to address, since WFP's contractual relationship is only with BLF, whereas recipients can use any ATM. An attempt to introduce monitoring of ATM sites through cooperating partners was abandoned due to complaints from bank branch staff and customers.

WFP's plan to switch validation processes to Liban Post is an effort to mitigate protection risks during implementation for refugees and safeguard donor funds. Donors now require recipients to attend validation every three months, which could increase the burden on recipients, although the number of verification sites will be also increased significantly. The roll out of this new system will be monitored.

Accessing and using ATMs can be challenging, but manageable

Across all FGDs, there was strong agreement on the difficulties recipients can face in accessing ATMs, but they do not prevent accessing of transfers (at least in the locations visited), as recipients are employing a range of strategies to manage the issues. In terms of reaching ATMs, these include sharing transport to reduce the costs. Harassment at checkpoints is a common issue, especially for men, and refugees report leaving transport before checkpoints or taking different routes to ATMs to manage this. In the FGD locations, households reported that they could always access more than one bank branch, though in certain border locations this is more of a challenge. It was furthermore reported that those with reduced mobility such as elderly, or female headed households in informal tented settlements, often rely on a third party to go to the ATM on their behalf.

Overcrowding is an issue faced at bank branches in locations with large refugee populations, where wait times can reportedly be two to three hours. Strategies include delaying their visit to the bank by at least one day or visiting other bank branches.

The majority of FGD participants (including young men) said they are not confident to complete the transaction process themselves and rely on others to help them. This is partly due to high levels of illiteracy as well as worries that they will make a mistake and lose their card or money. Some go with a family member, others, particularly women, send a household member to make the transaction on their behalf, and others ask people at the ATM or the bank staff for help. There were consistent findings in WFP's inclusion analysis and some evidence of this also in WFP's own FGDs.

AAP mechanisms and monitoring are not effectively identifying protection risks

Recipients relying on third parties to assist at the ATM or to visit the bank on their behalf could be exposed to exploitation. It appears common for those visiting the ATM on behalf of others to charge a fee, which could be wholly legitimate given the transport costs and waiting time involved. However, there was agreement among FGD participants that some people in the community are exploited as a result. Other statements related to possible exploitation and abuse include the Shawish (community leaders) and shopkeepers keeping recipients' cards, especially in cases where households owe debts, and perceived discriminatory behaviour of bank staff.

In order to further define and address these issues, a clearer visibility of protection issues, and more in-depth understanding of what is a systematic or a critical risk is required.

The call centre is not currently set up as an effective channel for identifying and addressing such risks, but closer engagement of cooperating partners and staff with communities, and exploration of these issues during monitoring, could be an effective means of uncovering incidence of such sensitive issues. This is, to some extent, included in some monitoring activities but perhaps not enough to clarify and identify protection risks sufficiently to drill down into them.

With the decision to move validation to Liban Post, where similar issues seen during cash delivery may also be experienced (attitudes of post office staff, crowd control, etc.), there is a need for more effective measures to identify protection risks.

Coordination

KEY DESK REVIEW FINDINGS

Good practices

- Combining AAP activities of different agencies - joint dissemination campaigns, common CFM and community engagement initiatives – makes engagement simpler and easier for communities, reducing duplication and increasing efficiency.
- On joint CFMs, establish protocols for data sharing and SOPs outlining roles and responsibilities, between participating agencies.
- Involve all actors with a role to play in implementation in interpreting findings and defining recommendations.
- Ensure common SOPs are followed by all cooperating partners.
- Establish coordination mechanisms that engage all actors with a contribution to make to the programme.

Part of the rationale for WFP and UNHCR to move to LOUISE was to improve the efficiency and effectiveness of accountability mechanisms – through establishing the common call centre and Q&A script, and the consistent (though separate) messaging to communities. The planned joint call centre is still not established and there

is no finalised data sharing agreement in place between UNHCR and WFP. The LOUISE steering committee, with representation from UNICEF, UNHCR and WFP, meets monthly, and bilateral meetings between the respective programme units of WFP and UNHCR are more frequent.

The MPC winter cash, and food assistance programmes of WFP and UNHCR represent most of the cash assistance to refugees in Lebanon. The few other agencies implementing MPC programmes (such as Relief International) have adopted the common targeting strategy for consistency with the UN programmes, but have not joined the LOUISE platform.

WFP is a member of the BAWG, established in 2015 to coordinate and harmonise the cash-based response for basic needs, along with UNHCR, several NGOs and the Ministry of Social Affairs. At national level, the group is tasked with developing common programme approaches and standards for use across the basic assistance sector. Coordination activities through the group have included agreement on a common MPC transfer value, harmonisation of MPC targeting and common guidance for communicating with communities. WFP and UNHCR use group meetings to provide regular updates on the status and progress of their MPC programmes and changes such as to the Q&A sheets. Members have also provided input into accountability aspects of these programmes where requested – such as concerning the GRM, and the phrasing and timing of the messages.

Increased call centre data sharing could improve efficiency and effectiveness of joint programming and AAP

For the most part, inter-agency coordination at an operational level appears to function adequately. There may be room for improvement in terms of coordinating on the planning and scheduling of certain activities that implicate both agencies to avoid confusion for recipients and frontline workers.

WFP and UNHCR KIs agreed that efforts to harmonise programming through the LOUISE platform have demonstrated clear benefits, but also significant challenges. Having a single card for all assistance, and a shared approach for card distribution, training, validation and complaints, is simpler and more convenient for recipients. However, the lack of a data sharing agreement between UNHCR and WFP, and lack of progress in establishing a truly joint CFM, severely curtails WFP's access to data, which can be a barrier to improving programme management. Finalising a data sharing agreement would allow for WFP to access information on its beneficiaries, have visibility of the frequency of protection issues, and to help to inform programme design and modify the targeting strategy.

Trying to work around this and maintain programming without such agreements is difficult for programme teams and can place strain on organisational relationships. These experiences highlight the real difficulty of achieving fully joint, efficient and effective programming in practice when systems must meet the needs, policies and legal concerns of different agencies.

Staff from both agencies also highlighted that reliance on the other organisation to address issues for their own recipients, without any control or awareness on the quality or timeliness of this, limits their ability to be accountable to target populations.

Cooperating partners could add more value to AAP efforts

Cooperating partners felt they could be more strategically engaged in the MPC programme and that being a partner, in the full sense of the word, would add value to quality programming and achievement of AAP and protection commitments. There is a certain amount of frustration felt at the lack of opportunity for partner engagement in design of processes, interpretation of programme data (from the call centre and monitoring) or related management decisions, when arguably their staff are among the best informed about issues facing communities and on what changes may or may not be needed. It was felt that there is sometimes a lack of information about why certain activities they are tasked with are being undertaken and limited 'closing the loop' on issues or suggestions being reported to sub-offices. Partners have their own accountability policies and commitments to meet and this lack of information was felt to undermine their ability to do this.

NGOs in KIs expressed a desire to be more constructively involved and informed, as they field queries, complaints and information requests about the MPC. This is also a finding of the CAMEALEON NGO survey. While acknowledging and appreciating some improvements in information sharing between the 2017 and 2018 programme cycles, NGOs suggested this could be improved through more timely and planned engagement to ensure field teams are fully informed, and to provide feedback or modify messages.

NGO staff have technical capacity in CVA and grounded, up-to-date knowledge of community dynamics and issues, and feel they could provide valuable insights to inform design and implementation decisions to a greater extent. NGO membership of the BAWG, and the group's mandate to collectively develop common programme approaches and standards for use across the basic assistance sector, can provide an appropriate forum for such engagement.

CONCLUSIONS

WFP, along with other MPC actors, can be congratulated for the demonstrable commitment, efforts, and investments made to achieve AAP on cash assistance in Lebanon. As this analysis shows, several aspects of the design and implementation of accountability mechanisms are in line with recognised good practices. The design of mechanisms for communication with communities and use of technology are highly relevant to the context while moving to common implementation processes for cash assistance has simplified recipient engagement.

Inevitably, when programming at this scale, through new approaches, and where capacities are being incrementally built, there will be challenges. This research has identified various issues, and findings are consistent with those of other recent studies such as the evaluation of the ESSN in Turkey. Some of the challenges stem from the operational model, where innovations aiming to improve efficiency and effectiveness of implementing cash assistance at scale (use of digital technology, data driven targeting, and partnerships with the private sector) also reduce opportunities for personal interaction between humanitarian workers and communities. Therefore, new approaches to APP are required to mitigate this challenge.

This is especially the case when combined with pressures to maintain the cost: transfer ratio in the face of high levels of need. The practicalities of joint programming, when data sharing processes are not fully in place, are also causing challenges. There are also examples of where best practice approaches to achieve AAP were intentionally not followed due to decisions made based on the context.

As highlighted earlier in this report, there is no definitive benchmark or minimum standard for achieving AAP on cash assistance programmes. Much of the existing guidance on AAP is also designed with small-scale programmes in mind. The documentation of AAP related learning and evolving practices from the WFP MPC programme and wider MPC cash system is therefore extremely important, not only to inform an emerging understanding of what best practices and standards could and should look like in the Lebanon context, but also to inform global thinking in this area.

AAP can be best thought of as a continuum from poor to ideal, with practices always open for further improvement or refinement. Where a programme, or its various AAP mechanisms, falls on this continuum depends on factors such as budgets, capacities, programme scale, and expected returns on investment. It is necessary to find a compromise between the desire to achieve ideal AAP, on the one hand, and managing these difficult realities of programming on the other. For example, certain activities or designs may be desirable but prohibitively expensive in a context where funds are limited, and each dollar spent on such overheads is a dollar less towards transfers for recipients. On a largescale programme, it is inevitable that mechanisms developed 'for the average user' may be less accessible for certain households. Difficult decisions must be made in terms of what additional investments are worthwhile and how broad and inclusive it is feasible and appropriate to go.

With this in mind, the following recommendations have been made to contribute to the continual strengthening of the WFP MPC programme.

RECOMMENDATIONS

The recommendations are intended to complement AAP related investments and initiatives already underway. Some could be implemented alone by WFP, whilst others will require joint consultation and agreement with MPC partners and other actors, particularly UNHCR and UNICEF as LOUISE members.

Smaller to medium scale adaptations

1. Provide top line information on MPC targeting eligibility at the same time that beneficiaries are now (since March 2019) informed about the duration of assistance. This messaging could be based on the scripted text already included in the current Q&A. Clarify call centre messaging about whether follow-up action will be taken. For issues where there is no likelihood of them being further addressed, such as queries on seeking (re)inclusion in the MPC programme, which do not fall within the eligibility of the GRM, the fact that there will be no further follow up by agencies should be highlighted by operators during the phone call.
2. Closing the loop: all call centre callers with issues that are referred by the call centre to WFP for investigation or action should be followed up with, even if the issue cannot be effectively resolved. WFP's on-going efforts to follow up with and provide a response to all logged card and PIN complaints, linked to the efforts to improve categorisation of complainant's issues by call centre operators, will hopefully address this.
3. When providing explanations on targeting, it could be better to emphasise that because of limited funds, not all eligible families can be prioritised, rather than beneficiary households being more economically vulnerable than non-beneficiaries.
4. Consider removing information about the option of calling the BLF call centre as an alternative to the UN call centre, given there is no WFP oversight of the process which limits WFP's ability to be accountable to beneficiaries. This could be implemented by phasing out the number from future ATM cards distributed.
5. Conduct an assessment of 'hotspot ATMs' where there are larger crowds of people seeking to withdraw MPC and, if identified as needed, develop a protection monitoring plan in consultation with bank branches.
6. Build recipient confidence in managing transactions by complementing classroom-based sensitisation on the ATM transaction process with practical demonstrations of using an ATM and beneficiaries being able to practice making a transaction. This could help to improve confidence and reduce reliance on third parties.
7. Continue to develop and expand the use of the refugee advisory groups as a channel for community participation, and invest in communicating their existence and their role to communities. This activity would need to be designed in partnership with UNHCR.
8. Adapt programme management processes to further include cooperating partners. This could include a regular, formal mechanism within the MPC programme management structures to allow partners to participate in the interpretation of CFM/monitoring data, share insights from their community interaction, and discuss or propose solutions.
9. Inform NGOs earlier about planned changes to the programme (especially in the targeting period) to better help raise awareness among communities.

Larger scale investments

1. Finalise the establishment of an in-country data sharing agreement between WFP and UNHCR to give WFP greater oversight of call centre data on WFP MPC beneficiaries.
2. Invest in enhancing face-to-face channels within the CFM, for example by building upon and making further use of helpdesks and establishing a data management system that can log and integrate complaints received from multiple sources.
3. Reduce costs associated with accessing the call centre, focusing particularly on raising community sensitisation and awareness of the free call back facility and call menu system, proposed as part of the new call centre, which is expected to reduce queue times.

4. Invest further in outreach and qualitative monitoring capacities, such as incorporating more qualitative approaches within existing face-to-face monitoring activities, and establishing dedicated outreach roles within partners to maintain more face-to-face contact with refugees, seek their opinions, and allow for greater oversight of protection risks (especially going forward at the new Liban Post as well as existing bank sites).
5. Systematically capture refugee issues and feedback shared with NGOs. For example, all issues reported by communities to NGOs (in addition to the data collected by WFP cooperating partners) could be logged with their case ID, for follow up by WFP/UNHCR. This could improve coverage and inclusion of the CFM. Integrating this into WFP's planned ticketing system of the future planned CFM would be a better way of collating such feedback, if non-UN actors can be provided with access to the system for data upload.

Some of the challenges identified during this research ultimately cannot be solved through changes to the existing systems, since they are fundamental to the design choices underpinning the programme. This includes the targeting mechanism, transfer modality design and the GRM. Addressing these issues would thus imply a fundamental rethink of these decisions. It is beyond the scope of this research to fully investigate these issues, the rationale for these design decisions, or the implications from any change. These are therefore presented below as questions for discussion. It is strongly recommended that all actors, including donors, reflect on these implications.

Commitment to achieving AAP – implications for programme design

Questions about design	What is the issue?
Do vouchers have a place in the basic needs response?	<p>The extensive evidence base from the years of providing CVA in Lebanon shows that refugees prefer cash to vouchers for meeting their food and basic needs. These vouchers appear to be continuing because particular donors and the government prefer this method. This upward accountability is reducing accountability towards communities, as their preferences and opinions are not followed.</p>
Should we be helping more with less?	<p>Best practice for designing MPC indicates that, to effectively meet desired outcomes, transfer values should cover the gap households face in meeting essential needs. However, programme effectiveness also depends on the ability of the programme to reach those most in need. In a context such as this, where so many of the most in need households (i.e. two thirds of those considered severely vulnerable) are not receiving MPC, there is a trade-off between these two drivers of effectiveness. There is a debate to be had over whether the most effective use of aid is to partially serve one third of those in need, at the expense of the thousands who are then excluded. Indeed, programme effectiveness should also be measured with reference to the occurrence of unexpected negative outcomes and, in this context, this decision to preserve transfer value but tightly target assistance is contributing to some social tensions.</p> <p>An alternative approach could be to lower programme expectations (objectives and indicators) and reduce transfer values in the interests of including and partially meeting needs for a larger percentage of severely vulnerable households. Some refugees themselves requested this during FGDs, and it seems many consider this a fairer allocation of resources. The ESSN evaluation in Turkey also stated that recipients preferred a larger number of refugees reached, even with a smaller amount. This is important from an accountability perspective, where community views and preferences should inform design.</p>
Is the PMT an appropriate targeting mechanism?	<p>No targeting method is perfect, and all will always have limitations. A well-known challenge of the PMT targeting methodology is its complexity. It is difficult for those without an econometric background to fully understand or be able to critique it, and even more difficult for communities to understand it. This lesson is evident in almost all countries where the PMT has been used on social protection programmes. The complexity of the targeting method employed in Lebanon is at the crux of the main challenges identified in this report. There is ultimately a limit to how transparent a complex process can be. From an AAP perspective, this calls in to question the appropriateness of such a methodology. Other limitations of the methodology were also identified, for example, the reliance of refugees updating their personal information with UNHCR. The ranking of households also provides notional objectivity, but is not meaningful in practice to identify the most vulnerable as there is no real difference in the vulnerability of households with a range of expenditure scores. Maunder et al. (2018) highlights the challenges of targeting in a context where most refugees are poor and where there is a high degree of homogeneity in the distribution of expenditure.</p> <p>An alternative approach could be to target cash assistance using a criteria-based approach, rather than PMT. Maunder et al. (2018) shows that the use of categorical demographic indicators was – to some degree – progressive. It facilitated transparency and a predictable caseload, with 48 percent of the transfer going to the poorest 40 percent. In Lebanon, this could draw on the variables that are presently included in the PMT. These indicators are shown to correlate with poverty, and most importantly, being mainly based on household demographic characteristics, are readily understandable to communities. It will not be possible to support all households who display these criteria and communities would need to be fully sensitised about limited funds and that only a percentage of those who fit the criteria can be assisted.</p>

Can a GRM add any value?

If the present focus of the GRM (only reassessing households already ranked as severely vulnerable) does not change, the mechanism will not be able to identify true exclusion errors (those excluded by the methodology and not by low coverage). In which case, it would be more cost-effective and equitable not to have it, and to spend these resources on including additional households in the initial targeting exercise.

If such a mechanism is to be continued, refugees must be informed of the opportunity to use it and of any outcome. This has a cost implication that should be weighed against the benefits, and compared to the alternative of simply investing these resources in increasing coverage during the initial targeting exercise. With the current gaps in information on targeting, or on how any re-inclusions are decided, such communication is likely to generate a surge in the use of the call centre/reception centres. Better to inform refugees about targeting from the outset, and set realistic expectations about which types of cases can be reassessed, which could mitigate this.

To be able to identify cases of erroneous exclusion, the GRM needs to assess complaints from those who were excluded based on their score. Taking this into account, the high levels of unmet needs and the need to manage the expectations of and demands on the system, any GRM must have a clear and specific focus that is understandable and considered fair. One option could be to limit the GRM to reassessing cases where households did not update their circumstances with UNHCR. Another is to investigate those excluded cases where there is a protection risk. This latter one should involve a face-to-face interview, which has a cost implication.

Research findings that contribute to wider learning on cash at scale

Developing minimum standards and guidance on what's 'good enough' for achieving AAP on large-scale programmes

Cash programming at scale inevitably means those implementing have less visibility of the situation for each recipient, and less ability to individually support each household along the 'user journey'. Furthermore, the technological approaches that are enabling CVA to be delivered at scale also reduce the interaction between programme implementers and communities, and therefore require new strategies from communication. Much of the guidance on AAP is designed with small-scale programmes in mind. It would be helpful to contextualise this guidance through the lens of a large-scale cash programme, and outline the fundamental best practices to strive for, including small investments that can make big differences for people and their experience of the programme, and define a level of error that is acceptable.

Selecting operational models for delivering cash at scale must consider AAP aspects and include perspectives of recipients

Desire for economy and efficiency gains has been a key driver in the evolution of the present operational model for delivering cash at scale in Lebanon. There has been an assumption that this operational model will also contribute positively to programme effectiveness, with greater coverage of the affected population strengthening efficiency and through harmonisation of assistance for recipients (single targeting, single card). However, there has been little focus in Lebanon, or elsewhere, on how communities experience automated processes and less face-to-face contact. The findings of this research suggest that this operational model contributes to accountability benefits for recipients but also poses certain constraints, which could undermine programme effectiveness. Ensuring accountability requires investments – in systems and in people – must be factored in to discussions on programme efficiency.

Establishing joint systems can be difficult in practice

There are legal and operational constraints to establishing efficient and effective joint systems between operational agencies. Without data sharing agreements, these systems cannot function to their full potential and returns on any investments in joint accountability systems will not be maximised.

Giving third party monitoring an appropriate mandate

If donors favour similar third party monitoring roles in other contexts, these should be conceived in a way that takes into account any joint systems underpinning the programmes of interest. This should include either providing a clear mandate to access the data needed from these joint systems or defining the scope of the role of third party monitoring accordingly (i.e. recognising the limitations on data access).

Defining the role for cooperating partners

The operational model followed on the MPC in Lebanon has centralised many programme functions. While it is certainly important to find ways to improve the efficient use of resources on CVA, there could be a risk that it misses opportunities to fully utilise the role of cooperating partners who work directly with affected communities and can contribute to capturing recipient experiences, programme effectiveness and inclusion of the vulnerable. Based on the evidence emerging from this study and other experiences of delivering cash at scale, cash actors globally should give thought to the operational and strategic roles that cooperating partners should play in these new ways of working.



A WFP MPC programme cash recipient in Bekaa participates in a CAMEALEON impact survey. She came to Lebanon with her husband and children in 2014, and has been receiving MPC since Dec 2017 (UNHCR since 2017, and WFP since 2018).
Photo: Adrian Hartrick

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