

Risk Mitigation Example B

Risk	Potential implications	Impact	Likelihood	Risk classification	WHAT DOES THE EVIDENCE SAY – Is the risk specific to CBI?	Benefits	Mitigation measures/comments	Responsibility
Inclusion error	Some persons with special needs but who are not especially vulnerable benefit from assistance	Medium	Low	Medium	ODI 2015 report mentioned that evaluations of humanitarian assistance still consistently point to weaknesses in targeting and monitoring. More efficient responses through cash would mean more time and resources to do these better.	More efficient responses through cash would mean more time and resources to do these better.	Improved targeting criteria with objective indicators, followed by household verification of assets (including phone ownership). Monitoring throughout programme. Beware potential for corruption / gatekeepers. Clear, early and continued two-way communication with communities about the programme's objectives.	Programme/ Protection/Partners, Data management, Registration
Exclusion error	Persons who are of most concern do not benefit from assistance	Medium	Medium	Medium				Programme/ Protection/Partners, Data management, Registration
Theft	Personal security breached and purchasing power lost	High	Low	Low	No, and in-kind assistance may be more visible, and is typically less portable than cash, making it an easier target for theft. A 2013 UNHCR / WFP review of evidence on CBIs and protection found that the risks of theft and manipulation are not exclusive to CBIs, and can be alleviated with good program design.	Less visible than in-kind assistance and other people will not know when a transfer has been made to a mobile phone. Can leave balance on the phone – need pin code to access.	Advise people to never to divulge pin numbers. Very low level of crime reported in the camp given the number of people.	Programme/ Protection/Partners, Community Services
Corruption by staff, authorities	Purchasing power affected	Medium	Medium	High	No, ODI study 2015 reported that cash is no more prone to diversion than in-kind assistance. Also money transferred using electronic payments (mobile money, ATM cards, or e-vouchers) can be better traced than physical cash and in-kind transfers, meaning that any fraud or diversion is more likely to be picked up (Brewin, 2009; Sossouvi, 2013).	Cash programmes are held to higher standards -therefore corruption more likely to be recognised.	Multi-agency / community targeting and verification teams and objective targeting / vulnerability criteria established where possible; strict monitoring. Ongoing verification required. Whistle-blowing policy should be reinforced and advertise. Tie in with complaints mechanism Online platform for transfers is used. Clear verification and payment control system in place. Complaints about non-receipt as well as unused transfers followed up quickly.	Programme/ Protection/Partners, Community Services
"Taxation" of beneficiaries by community members assisting Persons with specific needs (PSN) to access funds	Purchasing power affected	Medium	Medium	High	No – this can happen with in-kind assistance too.	Well designed programme should provide access to help and information from programme staff at no cost.	Multi-agency targeting and verification teams. Establish multi-sector targeting criteria. Regular monitoring. Whistle-blowing policy should be strengthened and advertised widely so people understand that services are free.	Programme/ Protection/ Partners, Community Services
Beneficiaries spend cash on items outside the programme's objectives	Objective/target of the intervention not achieved	High	Low	Medium	Evidence from elsewhere suggest this is unlikely and 'bad habits' not formed by cash -already existed.	Need to trust people to prioritise own needs and maximise the utility of assistance received - so not having to sell in-kind items at low value.	Sensitization campaign and proper needs assessment should identify most urgent needs. Explore possibility that spending outside of "sectors" is for protection or social capital. Conduct PDM to identify spending priorities. Indicators should, if possible, take into account gender-differentiated spending patterns. Apparently there are already high rates of spending on alcohol and sex workers – not clear that changes can be captured.	Programme/ Protection, Partners, Field

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Financial Service Provider (FSP) shares beneficiary data with country of origin	Beneficiary identity disclosure to third parties, resulting in protection threats	High	Low	Low	No, as data protection principles should be applied in the case of in-kind transfers from humanitarian agencies directly to beneficiaries, but electronic payment mechanisms necessarily include third parties (aside from humanitarian agencies and beneficiaries) which provide another potential channel for leakage of personal data.		Do a privacy impact assessment of the FSP; ensure data protection clauses in the contract. FSP bound by data protection laws – even sharing data of users with UNHCR/ Partners will require recipients to sign agreement <ul style="list-style-type: none"> • Data protection policy dissemination and adherence to data protection principles (see CaLP); PIA • Contracts with service providers include provisions in line with data protection policy • Beneficiary consent forms 	Programme/ Protection/Partners/ Finance, Supply
PSN experience difficulties using mobile technology	Redemption of funds by beneficiary difficult	High	Medium	Medium	CBI can be more discreet than in-kind assistance, so certain individuals e.g. LGBTI individuals or women heads of household may be able to receive assistance with less visibility than in-kind. HH will be targeted – strengthening family relationships and increasing the chances that difficulties will be overcome quickly.	Increase knowledge and capacity to use new technology.	In-camp information/ help desk and conditionality of capacity building for targeted individuals. Work with FSP to improve user interface Possibility of including a new module in literacy schemes (if any exist) on using mobile phones? There is already high usage of this technology amongst PSNs spoken to – especially in the Congolese community, Introduce conditionality of attendance/ understanding of training (use before and after survey of knowledge -this should not be "tick-box" exercise.	Programme/ Protection/Partners and FSP
Basic goods and services required by target group are not available	Access to basic items not increased	High	Low	Low	Specific to CBI		Sensitise market traders about cash payments and encourage them to stock suitable goods. Progressive introduction of cash programmes will ensure market grows. Need to encourage larger traders into Common Market. Current supply exceeds demand.	Programme/ Protection/ Partners, Community Services
Persons with disabilities cannot access the market	Redemption of funds/ goods by beneficiary difficult	High	Medium	Low	Not specific to CBI – this problem already exists for PSN accessing distributions as insufficient transport available – forcing PSN to depend on others leading to possibilities of exploitation.		Provide assistance to PSN to access the market (contract transporters) HH targeting reduces reliance on outside help.	Protection, Programme/Technical
Increased domestic violence/ tension over use of entitlement	Household violence, increased SGBV, or loss of control of assets by women	Medium	Medium	Medium	In general, studies have found that CBIs did not have dramatic impacts on gender relations, given the complex social and cultural roots of these relations. However, a 2014 study in Uganda found that gender relations generally improved between husbands and wives after cash transfers to women, though there were some reported cases of IPV against women.		Sensitization campaign on co-decision and management; Set-up or strengthen existing confidential complaints mechanisms. No evidence from elsewhere that this would happen. However, men control major resources including phones which may make access to transfers for women difficult. All members of focus groups felt that joint decision-making in HH took place and this would be unaffected by change in assistance modality.	Protection, Partners
Prices are fixed by retailer cartels	Purchasing power affected	Medium	Low	Medium	Specific to CBI		Strict monitoring; exclusion of offending traders	Programme/Supply

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Confusion of roles and responsibilities of different staff involved in UNHCR	Unclear decision making, lack of leadership, vacuum in terms of responsibilities and accountability, confusion when engaging the partners, delays in implementation/ disbursement	Medium	Low	Low	Not specific to CBI		Define clear role for each staff and IP involved as a part of the final SOPs, Staff capacity building and programme orientation. Ideally dedicated staff who are experienced in cash programme should be recruited and existing job descriptions changed to encompass CBI requirements.	Programme/HR/ Multifunctional team/Management/ Partners
Targeted HHs have no mobile phones	Unable to receive funds	High	Low	Low	In general, studies have found that CBIs did not have dramatic impacts on gender relations, given the complex social and cultural roots of these relations. However, a 2014 study in Uganda found that gender relations generally improved between husbands and wives after cash transfers to women, though there were some reported cases of IPV against women.	Supplying phones to small group will increase social standing and connectivity of sometimes marginalised people.	Targeted people with no mobile phones can be identified in advance during attendance at distributions etc..Sort out duplicates too. More likely to have inclusion than exclusion errors in this. Need field in ProGres Attempt to give the impression that phones will not be distributed to minimise numbers. Should be noted that men are in control of the main assets – not necessarily husband – maybe teenage son.	Programme/Supply/ Registration
Complaint mechanism not responsive/ not in place	Problems are not addressed in a timely manner and feedback is not provided to beneficiaries; Exclusion of eligible beneficiaries	Medium	Medium	Medium	Not specific to CBI – but a requirement for a CBI programme – cannot have CBI without		Accountability should be understood by all. Define roles and responsibilities both for collecting and managing complaints and for providing feedback. Should strengthen the community based complaints mechanism to be rolled out. At a minimum there should be a telephone hotline and a kiosk / stand for face to face interaction at least once per week as well as PDM. Understanding the shortfalls of a programme will lead to improvements.	Programme/ Protection/Partners, Community Services, Financial service providers
Increased risks to existing FSP agents	Increased number of risky visits to super agent(currently in Kibondo) to collect cash as well as increase in amount of cash stored in camp.	High	Medium	Medium	Specific to CBI		Work with FSP to increase number of agents. Training – encourage beneficiaries to make payments and save using the digital platform to minimise cashing out. Consider purchase of large heavy safes for agents.	Programme/ Protection/Partners, Community Services
FSP agents not be able to meet cash needs of beneficiaries	Agents unable to replenish cash frequently enough to meet needs	High	Medium	High	Specific to CBI		Work with camp leadership to increase access to permits for leaving the camp for agents. Work with FSP to increase number of agents. Training - encourage beneficiaries to make payments and save using the digital platform to minimise cashing out. Stagger transfers over time to minimise the number made each day – needs to be coordinated across agencies.	Programme/ Protection/Partners, Community Services
Network coverage prevents consistent access to mobile wallet	Tigo network coverage prevents beneficiaries receiving notification of transfers/ able to access service	High	Medium	Medium	Specific to CBI		New provision of connectivity expected to be provided. Insist that coverage improves before programme starts.	Programme/ Protection/Partners, Community Services
Transfers are not received	Beneficiaries claim not to have received transfers	High	Low	Medium	Not specific to CBI – seems to be an issue with NFI distributions in the camp too.		Careful/uploading of client transfer information to reduce possibilities of errors; strict monitoring of unused transfers using FSP online live portal.	Programme/Partners/ Finance