Linking
Forecast-
based Action
to Social
Safety Net
Programmes
in Bangladesh

Options for Linking Forecast-based Action and Social-Safety Net Programmes in Bangladesh

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June 2023

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Options for linking Forecast-based Action and Social Safety Net Programmes in Bangladesh

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Publication
June 2023

About the Document

This option paper presents the findings of a rapid assessment of five government Social Safety Net Programmes (SSNPs) identified to accommodate a forecast-based action approach to shock response in Bangladesh through their operational platforms and resources. Based on the enabling factors and barriers to such programmatic integration, the document proposes a staged approach to the institutionalization of forecast-based actions as part of the country's disaster risk management (DRM) and social protection strategies and draws some concrete recommendations for sector practitioners, including the SUFAL II consortium. The option paper is the second step of a broader research piece incorporating a local and global review of FbA experiences, and learning products based on a pilot planned to take place during the 2023 Monsoon season.

About SUFAL

The project "Scaling-up Flood Forecast-based Action and Learning in Bangladesh (SUFAL II) supports 38,340 people in community, sub-national and national level to take Forecast-Based Action (FbA) to protect lives, assets, and livelihoods from the impacts of monsoon flooding in northwest Bangladesh. Under the broader objective of strengthening capacity of government and communities to take early action, SUFAL-II continues to support GoB in developing a community-based approach on FbA; by highlighting risks and specific needs of most vulnerable households and communities and linking them to available institutional resources/services; and in turn, supporting institutions to better assist the most vulnerable communities ahead of anticipated floods.

The European Union Civil Protection and Humanitarian Aid Operations (ECHO) funded SUFAL II is a consortium project managed by CARE Deutschland e.V., implemented by CARE Bangladesh with Concern Worldwide (CWW) Bangladesh- and technical partners Regional Integrated Multi-Hazard Early Warning System for Africa and Asia (RIMES). Part of the implementation is sub-contracted to two national non-government organization: SKS Foundation and Echo-Social Development Organization (ESDO).

The European Union and its Member States are the world's leading donor of humanitarian aid. Through its Civil Protection and Humanitarian Aid Operations department (ECHO), the European Union helps millions of victims of conflict and disasters every year. With headquarters in Brussels and a global network of field offices, the EU provides assistance to the most vulnerable people on the basis of humanitarian needs.

About Oxford Policy Management

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Table of contents

List of tables, figures, and boxes

List of abbreviations

BDRCS	Bangladesh Red Crescent Society
CERF	Central Emergency Response Fund
DA	Disability Allowance
DC	Deputy Commissioner
DDM	Department of Disaster Management
DDO	Drawing and Disbursement Officer
DMC	Disaster Management Committee
DRF	Disaster Risk Financing
DRM	Disaster Risk Management
DRRO	Districts Relief and Rehabilitation Officer
DSS	Department of Social Services
DSSO	District Social Services Officer
EGPP	Employment Generation Programme for Poorest
FAO	Food and Agriculture Organization
FbA	Forecast-based Action
FbF	Forecast-based Financing
FD	Finance Division
FFWC	Flood Forecasting and Warning Centre
G2P	Government-To-Person
GDP	Gross Domestic Product
GR	Gratuitous Relief
GRC	German Red Cross
HIES	Household Income and Expenditure Survey
IFRC	International Federation of the Red Cross
KYC	Know-Your-Customer
MIS	Management of Information System
MFS	Mobile Financial Services
MoDMR	Ministry of Disaster Management and Relief
MoSW	Ministry of Social Welfare
MoU	Memorandum of Understanding
NGO	Non-Governmental Organization
NHD	National Household Database
NID	National Identity Document
NSSS	National Social Security Strategy
OAA	Old Age Allowance
OCHA	Office of the Coordination of Humanitarian Affairs
OPM	Oxford Policy Management
PHC	Population and Housing Census
PIO	Project Implementation Officer
PSP	Payment Service Provider

PwDs	Person with Disabilities
SOD	Standing Order on Disasters
SSNP	Social Safety Net Programme
US$	United States Dollar
USSO	Union Social Services Officer
WA	Widows Allowance
WFP	World Food Programme

Glossary

Disaster Preparedness - A set of measures undertaken in advance by governments, organisations, communities, or individuals to better respond and cope with the immediate aftermath of a disaster, be human-induced or caused by natural hazards. The objective is to reduce the loss of life and livelihoods.

Disaster Risk Financing (DRF) – A discipline that addresses the fiscal impacts and economic losses caused by natural hazards (e.g., cyclones, droughts, earthquakes, floods) and supports countries to increase their financial resilience to natural disasters.

Disaster Risk Management (DRM) – The application of disaster risk reduction policies and strategies to prevent new disaster risk, reduce existing disaster risk and manage residual risk, contributing to the strengthening of resilience and reduction of disaster losses.

Forecast-based Action / Early Action / Anticipatory Action (FbA/EA/AA) – Action initiated before a natural or climate-related disaster hits as soon as a forecast reaches a specified threshold value and activates a trigger. It aims to respond to a predicted disaster *ex-ante*, as opposed to just relying on *ex-post* humanitarian responses[1]. It aims at minimising the impacts of extreme weather events and save human lives or protecting livelihoods.

Forecast-based Financing (FbF) - A programme or mechanism that enables access to humanitarian funding for early action based on in-depth forecast information and risk analysis. The goal of FbF is to anticipate disasters, prevent their impact and reduce damage and losses, by making disaster risk management more effective.

Shock-responsive Social Protection (SRSP) – An aspect of social protection systems that focuses on shocks that affect a large proportion of the population simultaneously (covariate shocks). It encompasses the adaptation of routine social protection programmes and systems to cope with changes in context and demand following large scale shocks, so that they can be leveraged for response.

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[1] Ex-ante and ex-post responses simply categorize them based on the time of intervention, falling either before or after a shock.

1   Background

1.1   Background and framing

This option paper forms part of the technical support provided by Oxford Policy Management to the Scaling up Flood Forecast-based Action and Learning in Bangladesh project funded by ECHO and led by CARE Bangladesh, with Concern Worldwide Bangladesh and the Regional Integrated Multi-Hazard Early Warning System for Africa and Asia. The initiative aims at supporting communities and institutions to use Forecast-based Action to protect lives, assets, and livelihoods from the impacts of monsoon flooding in the northwest part of the country. This report documents the analysis of five existing government-led Social Safety Net programmes (SSNPs) to assess the barriers and enabling factors that can delay or favour the use of these programmes for emergency assistance through a forecast-based action (FbA). The option paper is the second step of a broader research piece incorporating a global review of FbA experiences, and learning products based on a SSNP/FbA pilot planned to take place during the 2023 Monsoon season.

Bangladesh has a long history of weather-related disasters[2], especially floods, due to its unique geographic and topographic features. The integration between emergency response and social protection dates to the 1980s, with the introduction of specific measures to combat the effects of food market distortions due to several types of covariate shocks (IFRC, 2022). Government social protection programmes evolved in the 1990s into a lifecycle approach with the design of schemes targeting specific vulnerable groups, such as children, the elderly, widows, and persons with disabilities and the unemployed (ibidem.). With emerging evidence at the national and global levels of the advantages of bringing together social protection and disaster management, Bangladesh could be a potential ground for testing the feasibility of different policy and programme-level integrations across the full spectrum of shocks, including floods.

Reaching chronically food insecure and vulnerable households through regular social protection is the most timely and cost-effective option for protecting individuals from both household and community level shocks, and there is good evidence that social protection helps households withstand shocks, and fosters household resilience.[34] Higher transfers can reduce negative coping mechanisms, rebuild asset stocks, reduce debt burdens, and have greater impacts on nutrition, investments, and productivity as well as economy-wide multipliers, with long-term consequences, and are potentially better value for money overall than annual humanitarian responses[5]

Forecast-based action has already been piloted by different organizations operating in the country with flood risk mitigation and response activities, for example, the Food and Agriculture Organization (FAO) and the World Food Programme (WFP) - under the coordination and financial support offered by the Office of the Coordination of Humanitarian Affairs (OCHA) through its Central

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[2] Bangladesh ranks 9th in the 2022 World Risk Index, which measures disaster risk for 193 countries globally. Between 1980 and 2019, the country faced 252 weather- and climate-related disasters, resulting in 163, 758 deaths and affecting nearly 60 million lives (Maintains, 2020).

[3] Barca, V., Sharpe, J., Flower, C. (2021) Social protection 'killer facts', Social Protection Approaches to COVID-19 Expert Advice Service (SPACE), DAI Global UK Ltd

[4] Resilience Measurement Pilot Study (2022) USAID/FNC/WFP (awaiting publication).

[5] Cabot Venton, C. 2021. Economics of Early Response and Resilience to COVID-19: Ethiopia. DAI/SPACE: UK

Emergency Response Fund (CERF), the SUFAL initiative and the programmes implemented by the International Federation of the Red Cross (IFRC). The positive effects of this approach are documented and, most importantly, were shared with relevant government representatives at the Ministry of Disaster management and Relief (MoDMR) and Ministry of Social Welfare (MoSW).

A primary legal framework for the pursual of FbA as part of the government disaster response management (DRM) strategy is the 2019 Standing Order for Disasters (SOD) – described at length in this document – which explicitly mentions Forecast-based Financing (FbF)/FbA as a viable response strategy and prescribes the creation of a government Taskforce for the definition of a relevant strategy and plans of action, the FbF/FbA Taskforce.

The SUFAL initiative, coordinated by CARE Bangladesh, has plans to pilot the implementation of a shock-responsive social protection initiative linking with FbA in collaboration with the government during the 2023 Monsoon season (should the need arise), in the target flood prone districts of Kurigram and Gaibandha. To this purpose, and in support of the work done by the FbF/FbA Taskforce, a process of institutional dialogue was initiated in the first quarter of 2022, with district consultation workshops centred on the assessment of different SSNPs based on a series of criteria for integration, followed by a national-level workshop to share the findings and further elaborate them into concrete programmatic options. A total of five government schemes were shortlisted to be considered for a pilot. These are:

Table 1 - Key features of the five eligible schemes (GRC/BDRCS, 2021; 2021-2022 Key Informants Interviews).

SSNP	Lead department/ ministry	Reach (N. beneficiaries)	Programme objectives	Targeting criteria	Transfer rate	Frequency
The Old Age Allowance (OAA)	DSS/MoSW	4.4 million	Income support for particularly vulnerable categories in all districts of the country.	Bangladeshi nationality, permanent residency. Age group-related and means-testing. Prioritization for persons with disabilities affecting their capacity to work, landless, old citizens, widows.	BDT 500 (4.7 US$) per month	Quarterly
The Allowance for Widows, Deserted and Destitute Women or Widows Allowance (WA)	DSS/MoSW	1.4 million	Income support for particularly vulnerable categories in all districts of the country.	Bangladeshi nationality, permanent residency. Priority to the elderly helpless and afflicted widow or the women who are deserted by their husband; to women who are poor, landless, widowed, or homeless and have children below the age of 16, people with disabilities and the sick.	BDT 500 (4.7 US$) per month	Quarterly
The Allowances for the Financially Insolvent Disabled or Disability Allowance (DA)	DSS/MoSW	1 million	Income support for particularly vulnerable categories in all districts of the country.	Bangladeshi nationality, permanent residency. Disability-based targeting. All PwDs above 6 years of age. Priority to the oldest of applicants; affected by multiple disabilities; children with intellectual disability or autism; women; landless and/or destitute; and extreme poverty stricken or live in remote areas. Participation of multiple members of the same household is allowed.	BDT 700 (6.60 US$)	Quarterly
The Employment Generation Programme for Poorest (EGPP)	DDM at MoDRM	0.83 million	To create employment for the able-bodied, unemployed poor for 80 days per year in two phases	Selected rural districts/upazilas based on budget and poverty rates. Bangladeshi nationality and permanent residency. Categorical targeting based on individual characteristics: adults, able-bodied between. Means	BDT 400 (1.8 US$)/day.	Weekly

SSNP	Lead department/ ministry	Reach (N. beneficiaries)	Programme objectives	Targeting criteria	Transfer rate	Frequency
			during the seasonal lean period, to reduce poverty and enhance disaster resilience of vulnerable households.	testing: landless, low-earning individual (< BDT 4,000 or US$ 47 per month). No double-dipping. Gender quota (One third female participation).		
The Cash-based Gratuitous Relief programme (GR)	DDM at MoDRM	Depending on activation.	Instant Cash assistance to disaster-damaged families or in the event of a death due to a disaster.	Vulnerable, poor households affected by the incident that GR is activated for.	Varying depending on type of shock, objectives, and coverage.	Varying depending on type of shock and objectives.

In November 2022, the SUFAL consortium developed a FbA/SSNP integration concept note which was submitted to the DDM to prompt a decision over the best integration solution for the upcoming rainy season. A third workshop took place in March 2023 to discuss the concept note and make progress for the integration and activation plan.

1.2   Specific objectives and approach

This option study intends to contribute to the process of design of a FbF/FbA strategy for Bangladesh, under the leadership of the government FbF/FbA Taskforce, with particular attention paid to the viable solutions for integrating it within existing social protection policies and programmes. The main objective of the study is to propose a plan for progressive integration of ex-ante forecast-based humanitarian responses to floods and social protection, considering policy changes, funding strategies and programme design requirements, and acknowledging the critical role of third party, non-governmental partners in the process. The primary audience of this document is the Government of the Peoples' Republic of Bangladesh, through its DRM and social protection governing institutions, as well as the wider community working in shock-responsive social protection, including the SUFAL team. The SUFAL programme commissioned the study to generate practical recommendations for its own contribution to the country's FbA agenda.

The study's specific objectives are:

- To define the critical steps for designing pilot programmes that can generate evidence regarding the best practices and potential barriers to integrating FbA and SSNPs within the Bangladesh context (short term).

- Propose and document a set of options for permanently integrating FbA within one or more SSNPs, highlighting the necessary phases and steps for achieving it in the medium to long term.

- To assess the pilot concept note presented by the SUFAL II consortium and provide guidance on the key actions required for its implementation.

To achieve these objectives, a careful review of all documents related to the DRM and social protection legislation and policies, the five shortlisted instruments (programme documents, implementation manuals, research reports) and the FbF/FbA strategy progress was conducted before engaging with relevant stakeholders.

First-hand information was sourced from MoDMR and MoSW director, deputy-director, and officer level staff at national and local level during two separate data collection processes. Between October 2021 and March 2022, OPM engaged the government and external stakeholders to collect information for a separate study on the state of the DSS structure and functions vis-à-vis the need for more shock-responsiveness of its operations. Findings from the Key Informants Interviews (KIIs) conducted then fed into the analysis for this option paper. An additional round of consultations was conducted in May 2022 during workshops with local and national government stakeholders involved in DRM and social protection. The workshops took place on the 12 and 18 of May 2022. Finally, a complementary round of interviews, predominantly with DDM staff, was conducted between April and May 2023 to fill in any information gap. The consultations focused on the DRM and social protection legal and policy environment, programme funding mechanisms, coverage and targeting strategies, administrative capacity, systems and processes for enrolment and payment, data, case, and grievance management. The full list of consulted government and non-governmental agencies can be found as Annex 1.

This document is structured as follows:

- Section 2 presents a generic framework for integration, based on the features of FBA programmes and the SSNPs under examination, pointing to a series of required actions and programme changes to attain different degrees of integration – from systems' piggybacking to a full revision or refocusing of programmatic parameters. The framework aims at describing all options at hand, explaining their objectives and likely outcomes.

- The analysis of the enabling factors and barriers to a successful FbA integration is presented in Section 3, looking at cross-cutting policy areas and operational systems, before assessing the five programmes in separate sub-sections.

- Section 4 finally presents a proposed FbA/SSNP integration phased approach for Bangladesh, starting from the five shortlisted programmes to reach out to large sections of vulnerable population in flood prone Upazilas and to generate evidence that can spur tighter integration, policy change and the development of an FbF strategy.

- The closing section (5) presents the main conclusions from the analysis and concrete recommendations for the key stakeholders involved in the integration efforts – including the SUFAL II team - for the implementation of the plan, linking each step with the FbF/FbA Taskforce's action plan and other ongoing policy interventions.

1.3   Limitations of the study

This research has been conducted remotely, thereby increasing the challenges in engaging relevant stakeholders, particularly at the lower tiers of government. Despite efforts, no virtual interviews could be arranged, reducing the opportunity for discussion and investigation of the five programmes under assessment. Few face-to-face Key Informants Interviews (KII) could be arranged, although not attended by the assignment's lead consultant but through country-based OPM Bangladesh staff. Furthermore, the research period largely coincided with the end of Ramadan and with the extended Eid-ul-Fitr festivity in Bangladesh which reduced the availability of essential government staff.

Most of the SSNPs in the country, and particularly those under the review, have undergone upgrades of their operating systems (e.g., registration and data management processes and systems) which are not yet mentioned in the implementation manuals nor documented on the open-source government resource platforms. The KIIs conducted in 2023 were only partially able to inform on both completed and ongoing system enhancement projects. For this reason, the reduced availability of government staff during the data collection period impacted more where documentation is scarce, such as the GR programme, whose implementation are generally poorly documented.

Nevertheless, the reader will find the evidence and analysis presented in this document useful to pursue more dialogue with ministerial staff and a deeper assessment of the key programme design features, processes and supporting systems that can enable, or indeed prevent the expected integration to take place.

2　Integration framework

The integration of Forecast-based Financing and Action within existing institutionalized, government programmes can be activated in several different ways. It may partially take place through leveraging of data sharing of different SSNP beneficiary lists, and it can ultimately culminate with a refocusing of a SSNP to ensure complete anticipated action in response to a shock. Any adopted long-term solution will ultimately be integrated in existing plans at national and local level to guarantee its sustainability and timely activation. The table below presents all available options, their objective, and conditions for integration.

The integration options below aim at addressing the differences between standard FbA initiatives and SSNPs that have been running on consolidated schedules and operational models for years. The overall objective is to harmonize protocols and systems so that programmes can be scaled-up or their operating systems be used to support an anticipated action ahead of a shock. The options listed below are ordered from the operationally simplest and less ambitious, through temporary scale-up solutions, to a deeper level of integration represented by a permanent change of its key design parameters.

Table 2 - Integration options framework

Integration objective	Integration model
To harmonize targeting strategies (FbA initiative and SSNP)	**Separate scheme targeting SSNP beneficiaries in shock-prone areas.** To use a SSNP beneficiary list for a FbA initiative implemented separately, as a standalone programme, providing a different transfer value which effectively adds on to the regular SSNP transfer however running on a different payment system and schedule. The beneficiary list needs to be shared months before the start of the rainy season to allow for appropriate cleaning and verification in time for an FbA activation.
To align transfer schedules and respond to shocks in a timely manner	**Programme refocusing** transfer schedule realignment. To reschedule one or more transfers to align with the early warning trigger schedule. Following an alert, the programme needs to be able to promptly release cash within 24/48 hours or as defined by the Early Warning protocols endorsed to support the action.
To guarantee unconditional access to humanitarian support	**Programme refocusing** removal of conditionalities. To either remove hard conditionalities or to 'soften them' when activating an FbA intervention. The decision needs to be taken months in advance by the programme Steering Committee and activated in case of an alert.
To harmonize payment processes (FbA initiative and SSNP)	**Systems piggybacking** payment.

Integration objective	Integration model
	To make use of a consolidated payment platform to perform cash transactions as part of a standalone FbA initiative.
To harmonize grievance management processes (FbA initiative and SSNP)	**Systems piggybacking** grievance redress management To make use of a consolidated and independent grievance redress system to collect claims and complaints from recipients of cash as part of a separate FbA initiative.
To ensure that SSNP beneficiaries can access adequate financial support to mitigate the effects of a shock (prioritizing climate-vulnerable groups and areas)	**Vertical expansion** (with schedule realignment) To increase the benefits received by the beneficiaries of one or more SSNP, or by part of its caseload, in anticipation of a shock. The transfer must take place upon meeting one of the triggers included in the Early Warning system endorsed for that action.
To expand - temporarily and on a forecast-basis - the SSNP caseload to groups vulnerable to floods	**Horizontal expansion** (with schedule realignment) To increase the population coverage ahead of a predictable shock, by either expanding the rules of eligibility or by removing enrolment quotas/caps within the same eligible groups). In the case of floods, the caseload expansion must take place months before the start of the Monsoon season to enable all necessary data cleaning and validation steps ahead of activation, which is regulated by the Early Warning system endorsed for that particular action.
To make use of a flexible government emergency cash-transfer model to activate a FbA.	**Forecast-based activation of a government's flexible emergency cash transfer instrument.** To design a separate forecast-based emergency cash transfer scheme making use of existing government models, if available.
To permanently expand the SSNP caseload to groups vulnerable to shocks	**Programme refocusing.** To modify a programme's targeting and delivery strategy to link it with an endorsed Early Warning system; to permanently include new vulnerable groups; to make provision for seasonal forecast-based scale-up interventions in case of shocks.

3 Enabling factors and barriers for integration with existing SSNPs

Using social safety net programmes to reach households vulnerable to the effects of weather/related shocks, such as floods, frequently involves the adaptation of their scope, targeting approach and operations. In some cases, the policy and funding environment constitute an enabling factor, as in case of explicit policy mention of social protection shock-responsiveness or where guidelines for channelling emergency funds to social protection instruments existed. Barriers can be the absence of any of these factors and a strong "siloed", sector-specific approach to disaster risk management, where there are no formal legal frameworks or operating approaches linking to DRM.

At programme level, the availability of inclusive registries, and digital services for registration, payment and data management can be associates with a system's shock-responsiveness. On the other hand, a strict poverty targeting approach, wholly manual processes, or overly complex Know-Your-Customer (KYC) processes of beneficiary registration within electronic payment platforms can present barriers to a successful response, especially if anticipated.

Programme governance, capacity and coordination are cross-cutting inputs which gain even more relevance in the case of *ex-ante,* forecast-based interventions relying on an efficient set-up phase and on effective communication channels for their activation. The sections below are dedicated to assessing the observed enabling factors and barriers that the FbA community must harness or address to move forward with the government vision to make FbF/FbA part of its DRM agenda.

3.1 Legislative and policy backing

The legislative environment in Bangladesh is generally conducive to making steps forward in the design of increasingly effective and integrated responses to the numerous shocks affecting the country. In fact, the country's extensive experience in leading or enabling humanitarian responses for floods has resulted in a comprehensive body of legislation on the matter.

The 2012 Disaster Management Act provides the legal and institutional framework for disaster management in Bangladesh, defining the organisational structure of disaster management at national and local levels – through Disaster Management Committees (DMCs) responsible for the supervision and implementation of DRM-related policies, plans, and actions - under the overall leadership of the DDM at the MoDMR.

The act makes no mention of any linkage with the MoSW through the National Disaster Management Council – the steering group for disaster management headed by the Prime Minister - nor social welfare funding potentially available to respond to heightened needs during shocks. This gap was however filled by subsequent acts of government – the Standing Orders on Disasters, issued in 1997, 2010 and 2019 – which are there to provide the legal basis for disaster management by informing all concerned government entities about their roles and responsibilities in it. The SOD defines the membership of the disaster management coordination structures, all chaired by the MoDMR or by the DDM and, since 2010, participated by the MoSW or by the DSS, one of its constituting departments.

The 2019 SOD increased the number of policy and coordination committees and taskforce groups and increased the participation of the MoSW or its Department of Social Services in them (e.g., in

the National platform for Disaster Risk Reduction), both at national and district level, showing a marked policy shift towards the use of social welfare instruments for disaster relief. Both 2010 and 2019 SODs envisage the use of cash for relief, with the latter making specific reference to the use of conditional and unconditional cash programmes along the DRM cycle (response and reconstruction). Most importantly, **the 2019 SOD officially launches a technical Taskforce, reporting to the MoDMR, to define FbF/FbA strategies, guidelines, and plans.** The FbF/FbA Taskforce is also expected to make policy recommendations on the topic of FbF/FbA and to coordinate with the sector leads among the international agencies operating in the country. The FbF/FbA Taskforce has been in place since March 2021 and is currently working on policy determinants such as the definition of a standard FbA transfer value. Based on discussions held during the first three meetings held between March 2021 and January 2023, **the BDT 4,500 value already in place for ex-post responses and based on an estimation of the minimum expenditure basket levels for a four-member household, could soon be standardised across all FbAs**.

A 2022 shock-response addendum enables the eligibility criteria for key MoSW cash allowances to be relaxed in the case of a shock, to expand caseload to all those potential recipients of assistance complying with the programmes' eligibility criteria which were excluded from the final lists due to budget caps or other reasons.

A 2021-2025 National Plan for Disaster Management is currently guiding the implementation of the Disaster Management Act 2012 and facilitating the development of annual work plans for different implementing agencies. In the document, the MoDRM **commits to investing into** *"implementing disaster risk reduction integrated/inclusive social safety net programmes"* (Ministry of Disaster Management and Relief, 2020) **through ten SSNP implemented by different ministries.** It also envisages the creation of a team within the DDM to coordinate the mainstreaming of social protection in DRR plans by 2022. The FbF/FbA Taskforce is enlisted as one of the key national level disaster management institutions led by the MoDMR.

On the back of specific thematic policies on disaster management (2015), older persons (2013), disability (2013) and others, a National Social Security Strategy (NSSS) was developed in 2015, followed by an implementation plan (2016, updated in 2021). The strategy defines the key decision-making bodies and their powers over the DSS SSNP policy directives and resourcing allocation. In its latest version, the strategy makes explicit mention of shock-responsiveness and integration as one of the main priorities in the 2021-2026 period and lays down specific actions for the key involved ministries to pursue.

FbF/FbA does not feature anywhere in the document, despite the SOD's strategic directives through the establishment of the technical Taskforce, showing the still early stage of strategic development in this area of work. However, **several important systems' enhancement projects which could benefit the establishment of an FbF/FbA strategy in the future are in the making and mentioned in the document**. With respect to the MoDMR and MoSW planned work, these are outlined in table 2 below:

Table 3 – Relevant actions from MoSW and MoDRM action plans 2021-2026

Ministry	Action point	Timeline
MoSW	Make the OAA and WA programmes universal	July 2024
	Review OAA age threshold	December 2022
	Scale-up disability benefit for children and working-age (PwDs)	December 2022 (new targeting protocols defined)

Ministry	Action point	Timeline
	Create public awareness about the facility of central GRS of the Cabinet Division.	July 2023
	Develop online based single Registry and Management of Information Systems (MIS) for key programmes	July 2023
	Digitize cash transfers	July 2023
MoDMR	Consider horizontal and vertical expansion of existing programmes in the face of disasters	July 2023
	Prepare a disaster map based on hazard and vulnerability	January 2024
	Enhance grievance redress systems through partnerships with Non-Governmental Organizations (NGOs) and the use of a centralized system.	June 2022
	Create standard Programme MIS using a national identification document (NID) as a primary key	December 2023
	Make the MIS interoperable with other relevant departments	June 2025
	Digitize cash transfers	June 2025

(Source: Cabinet Division of the Government of the People's Republic of Bangladesh, 2022).

Despite such articulated policy and governance system and the existence of regularly updated plans, **the level of coordination remains weak due to limited human resource capacity within the ministries and the key committees tasked with implementing such plans** and the prevalence of sector specific agendas over coordinated decision making (Maintains, 2020).

3.2   SSNP ordinary funding and disaster risk funding strategies

In the current set up, all five schemes are funded through government annual funding allocations (partly supported through World Bank credit mechanisms), made based on different budget estimations and signed off by the Finance Division (FD) of the Ministry of Finance. Before the COVID-19 crises, the SSNP budget represented approximately 2.5 per cent of the country's Gross Domestic Product (GDP)[6]. After the COVID-19 surge in funding for the sector, the 2022-2023 budget indicates the return to pre-pandemic levels with the same 2.5 per cent levels (Ministry of Finance, Finance Division, 2022). The transfers are primarily tax-financed, while technical and institutional reforms are supported by external financing – either through budget support or technical assistance projects by a range of development partners.

The budgets for the following fiscal year are compiled at DSS and DDM level, revised at ministry and Steering Committee level, then approved by the Department of Finance. While for OAA, WA, DA and GR funds are allocated to all districts at the start of every fiscal year, the EGPP has its funds allocated based on upazila poverty rates and other criteria defined by the Ministry of Finance.

While operational costs are covered through ordinary funding to local administrations, programme disbursements for the OAA, WA, DA and EGPP take place from the DSS/DDM straight to the beneficiaries' accounts within the financial institutions issuing the payments. Such transfers take place on a quarterly basis or based on a specific programme schedule (in the case of the EGPP). For the GR funds are theoretically transferred to the district level administrations through the District Relief and Rehabilitation Officer (DRRO) at the MoDMR at the start of the fiscal year. These are to

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[6] Data for the 2019/20 financial year.

ensure a timely response to emergencies however, in practice the MoDMR only transfers part of the funds in advance, to better control their usage by the district administrations.

Adequate financing of disaster risks using appropriate instruments is a major bottleneck for the DRM system in Bangladesh. The lack of a comprehensive Disaster Risk Financing (DRF) and Forecast-based Financing strategies for the country empowers the Finance Division under the Ministry of Finance to allocate budgets for different line ministries at the beginning of each fiscal year based on the budgets submitted by different departments and on financial availability. The allocation can be subjected to some bargaining rather than being regulated by any particular protocol. Every year small allocations are made for the following items: a) a DRR fund; b) an emergency fund for disaster management at the district level; c) a fund for unforeseen incidents; and d) a fund to NGOs (Maintains, 2020). Additionally, the Bangladesh Bank, the insurance sector and the microfinance sector play a role in post-disaster responses in the country.

The lack of a DRF or FbF strategies is a major barrier to the allocation of funding ahead of a shock, therefore the finalization of the work currently being led by the FBF/FBA Taskforce will be a major step forward, paving the way to meaningful government ownership of the model.

Generally, there is a very high reliance on foreign aid for financing disaster responses. **However, the pandemic induced the government to commit 27 percent and 17 percent more budget to the SSNPs during the financial years 2019/2020 and 2020/2021 respectively compared to previous financial years[7]** (Maintains, 2021), **mostly funded through government budget reallocations.** A great portion of funding was directed to the GR programme, with only a marginal budget increase (about 15%) recorded by the three MoSW programmes, indicating the government's clear preference for a flexible instrument like the GR as opposed to complex scale-up initiatives using existing schemes.

3.3 Common systems supporting implementation

The application process for four out of five schemes (GR excluded) could lead to exclusions of the most vulnerable households if not properly informed and supported in their application to the scheme. Consequently, self-selection via an application process could play as a barrier to using the schemes in situations of emergency if not through additional caseload identification. Although the mix of categorical targeting and means-testing that the OAA, WA, DA and EGPP programmes employ can capture a vast section of the most vulnerable populations in the country, the effectiveness of the targeting model depends on the programmes' reach, also determined by budget restrictions communicated on an annual basis, and the effectiveness of the application and enrolment processes. In this case, the budget ceilings and the self-selection process enforced by the four programmes can constitute a barrier to inclusion.

There are essentially three conditional steps required for any household to participate in the OAA, WA, DA and EGPP programmes: First, the household must be aware of the existence of the programme. Second, the household must decide to participate in the program and place an application. Finally, having applied the household must be selected by the program authorities as

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[7] The government budgets for social protection from 2018-19 to 2022-23 FY are as follows:
2018-19: BDT 644 billion (Approximately US$ 6 billion).
2019-20: BDT 818 billion (Approximately US$ 7.61 billion).
2020-2021: BDT 956 billion (Approximately US$ 8.9 billion).
2021-22: BDT 1,114 billion (Approximately US$ 10,3 billion).
2022-2023: BDT 1,135 billion (Approximately US$ 10.5 billion).

eligible to participate (World Bank, 2017). Lack of information due to low outreach capacity and frequent cases of nepotism and corruption during eligibility assessments at ward level limit access to those truly vulnerable households that are not able to secure support by local political authorities (Ibidem.). Even if workers are selected on an annual basis based on fresh applications at the local level, like in the case of the EGPP, no rule is in place to limit the selection of the same households in different years.

The digital payment system in place in four out of five schemes (GR excluded) offers opportunities for expanding the range of access points (from banks to agents located in the communities). On the other hand, bank-based operations can at times slow down the enrolment of new recipients if not adequately anticipated and managed. Bank-based electronic payments and mobile financial services (MFS) are in place for the OAA, WA, DA and EGPP programmes, which suggests that ex-ante transfers could potentially be made at the click of a button at least for already enrolled households.

In fact, the Memoranda of Understanding (MoUs) between the DSS/DDM and the PSPs generally have the flexibility to support horizontal or vertical expansion of the cash allowances in the event of a shock. However, the payment service has generally suffered from access and system efficiency issues, as indicated by the World Bank in its 2019 programme briefs (World Bank, 2019a, b, c, d) and confirmed by several KIIs in 2021-2022. Low level technical challenges with the digital payment technology (e.g., e-wallet functioning) can contribute to diminishing the system's shock responsiveness and must be addressed through a continuous engagement with the private sector service providers.

Over the years, the quarterly funding process has been made more efficient (see box 1 for details about the current process) due to the centralization of transfers and the digitalization of the entire flow, removing any manual interaction by government or PSP officials alike. The new system represents a crucial step forward from manual payments towards the digitalization of the Government-to-Person (G2P) payments environment and presents undisputable advantages in terms of security and traceability of all transactions. **What remains to be tackled is the harmonization of all digital payment systems in the country to increase access close to home and to optimize the registration process' timeline, to make the overall payment system more shock responsive.**

In fact, programmes in different districts each engaged a trusted service provider which may be a bank or an MFS. In both cases, the digitalization, traceability, and security of transactions is guaranteed. However, while mobile money assures a flexible service and, most of the times, a cash-out process close to home, through its agents' networks, bank transactions still only take place at the nearest branch, often localised in urban areas.

Furthermore, even mobile money digital payments require adequate preparation to operate smoothly, through demanding and resource-intensive KYC and registration processes for guaranteeing customers identity and compliance with international anti money laundry and financing to terrorism regulation. **In the event of recurrent, predictable shocks requiring an FbA type of intervention, the early registration and onboarding of beneficiaries is an essential requirement for a successful response.** Furthermore, adequate outreach and financial literacy training must also be considered, especially when liaising with very vulnerable households yet not familiar with the mobile phone technology.

Box 1 - DSS SSNPs payment system (2021-2022 KIIs)

G2P payment system in place for DSS SSNPs
The process of beneficiaries receiving the payment is as follows: • The payment process starts with the Union Social Services Officers (USSOs) preparing the payroll for their respective upazila and sending it to the DSS head office through the MIS. • The drawing and disbursement officer (DDO) at head office consolidates and processes the payrolls and forwards these to the G2P MIS under the Social Protection Budget Management Unit (SPBMU) of Finance Division. • The Finance Division verifies the data and sends back the hardcoded data to the DDO at DSS head office. In terms of verification, the FD checks that NIDs and mobiles are valid. It does not check that the mobile number is registered against that NID, given that many beneficiaries are using the mobile money account of relatives or neighbours. • The DDO digitally forwards the hardcoded data received from FD to the concerned accounts officer through the government financial management system. • The accounts officer sends the electronic fund transfer (EFT) advice through the same financial management system to a trust account hosted within a state bank. • The bank uses the EFT to send the advice to all the mother banks (in the case of MFS and agent banking) or to the other state banks providing the payment service to beneficiaries. • They then send money to beneficiary's accounts. The mother banks need to report back to Bangladesh within 24 hours if they will not be able to make all or some of the payments e.g., because some accounts are inactive or cancelled. Beneficiaries receive two SMS in relation to receiving their quarterly payments; (i) when the Bangladesh Bank sends the advice; and (ii) when the money credits the beneficiaries account.

When triggering a cash payment a few days or weeks ahead of a forecasted shock time-efficiency gains during cash-out operations become especially important, hence electronic payments allowing the quick disbursement of cash take precedence, if access points are readily available in affected areas and do not require travel and long waiting hours. In the case of an ex-ante activation, electronic payments can only be used if eligible cash recipients are duly registered in advance. If time does not allow, a manual disbursement mechanism would have to be pursued.

Manual payments, although presenting multiple risks, can be used to rapidly reach new recipients. Cash-in-hand systems can be effective in emergency situations since they cut-down on several administrative steps such as KYC and registration with payment providers, bank account opening, distribution of cash-out tools (if any), which can be a real barrier to a quick response. However, manual payments are generally very inefficient, present considerable risks and, most importantly, can be inconvenient for vulnerable recipients who must travel to payment points and wait for hours before they can be attended to. They should as much as possible be discouraged for ongoing social protection programmes. The GR programme runs on a completely manual payment system, whose transactions are supported and recorded by the union and ward level committees. No evaluation of its performance could be found.

3.4 Administration capacity across the SSNP management structures

Limited capacity and resources at union and ward level to face additional responsibilities. Generally, and across different sectors, the local government and programme administration teams at district and sub-district level suffer from lack of sufficient administrative staff to ensure a comprehensive service to SSNP beneficiaries. Substantial evidence points to lack of sufficient funding to support some of the additional services to SSNP beneficiaries such as outreach, case, and grievance management (World Bank, 2019a, b, d) on top of the full range of functions expected, particularly at the union and ward level. Most of funds allocated to social protection across all ministries involved in the sector (up to 95 per cent in the fiscal year 2018-19)[8] are destined to the national and the upazila levels of administration. Budget constraints are also one of the reasons for the lack of mobility across unions and wards, even in the event of a shock requiring surge support (OPM, 2022).

Figure 1 - DSS administrative structure (Source: 2021/2022 KIIs)

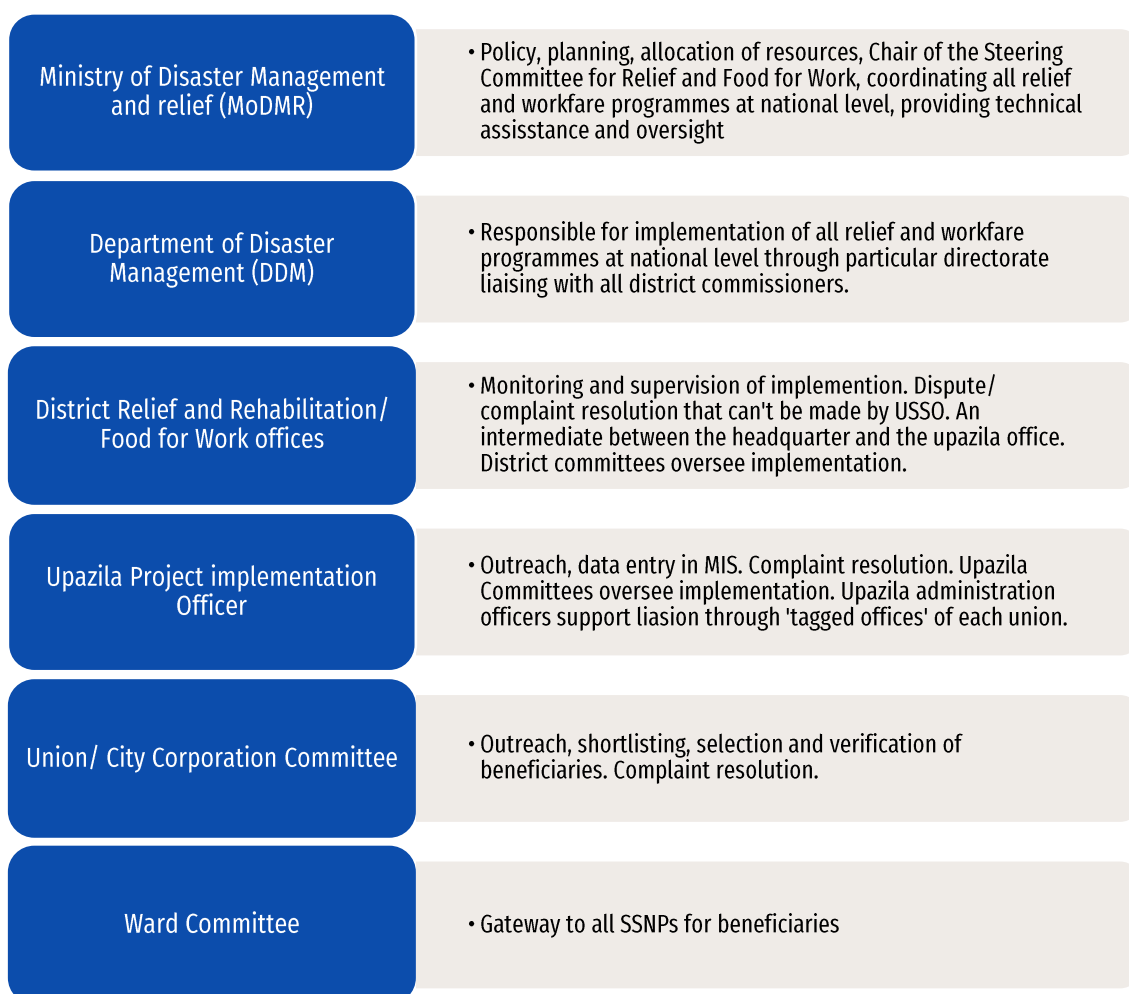|	
MoSW- Social Safety Net (SSN) branch	• Policy, planning and allocation of resources
DSS Head Office- SSN branch	• Created in 2019, SSN branch is responsible for implementing the 10 DSS SSNPs
Divisional Social Service Offices	• Monitoring and supervision of implementation within their jurisdisction
District Social Service Offices	• Monitoring and supervision of implementation. Dispute/complaint resolution that can't be made by USSO. An intermediate between the headquarter and the upazila office
Upazila Social Services Office	• Outreach, beneficiary list finalization, data entry in MIS. Complaint resolution.
Union Social Services Office/ Urban Community	• Outreach, shortlisting, selection and verification of beneficiaries. Complaint resolution
Ward Committee	• Gateway to all SSNPs for beneficiaries

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[8] World Bank, 2021, p. 95.

Within the DSS structure, the 2022 addendum prescribes the use of ordinary registration, payment, data, case, and grievance management systems for the implementation of a shock response, without specifying how, when, or where resources can be increased or reallocated in the event of a shock. There are currently no clear guidelines to outline how decisions would be made to mobilise additional resources – including human, technical and physical - to support scale-up.

The available literature reveals that these capacity constraints, lack of clear protocols for decision making and slow digitalization process is already impacting on the delivery of social assistance programmes (2023 KIIs; World Bank, 2021). In terms of day-to-day implementation of the cash allowances, it is upazila staff within the Project Implementation Office (PIO) and Social Welfare Office to play the most substantial role in the implementation of DDM and DSS schemes, respectively. A notable strength in relation to shock-response, when compared to the DDM, is that the **DSS has staff down to the union level**, however insufficient to guarantee service quality (World Bank, 2021). It is only one USW per union (although many of these posts are vacant) and his/her role is broader than just for DSS SSNPs and covers a range of other DSS programmes (Maintains, 2021). In practice, USWs also have additional responsibilities from other departments, which has important repercussions for their workload and the quality of delivery of essential services to SSNP beneficiaries (KIIs 2021/2022). Ù

Figure 2 - MoDMR programme implementation structure (source: 2023 KIIs with the Director of Relief at MoDMR)

Ministry of Disaster Management and relief (MoDMR)	• Policy, planning, allocation of resources, Chair of the Steering Committee for Relief and Food for Work, coordinating all relief and workfare programmes at national level, providing technical assisstance and oversight
Department of Disaster Management (DDM)	• Responsible for implementation of all relief and workfare programmes at national level through particular directorate liaising with all district commissioners.
District Relief and Rehabilitation/ Food for Work offices	• Monitoring and supervision of implemention. Dispute/ complaint resolution that can't be made by USSO. An intermediate between the headquarter and the upazila office. District committees oversee implementation.
Upazila Project implementation Officer	• Outreach, data entry in MIS. Complaint resolution. Upazila Committees oversee implementation. Upazila administration officers support liasion through 'tagged offices' of each union.
Union/ City Corporation Committee	• Outreach, shortlisting, selection and verification of beneficiaries. Complaint resolution.
Ward Committee	• Gateway to all SSNPs for beneficiaries

The DDM structure presents similar challenges, even more so since its operations at the union and ward level are coordinated exclusively through committees made of local government and civil society representatives, who oversee all government functions at those levels of administration. Enrolment and outreach activities are a primary responsibility of union and ward level committee members, which are also managing other programmes. As in the case of the selection of EGPP sub-projects, the committees at all levels can be involved with different technical decision-making functions and oversight responsibilities, which considerably limit their capacity to deliver quality personal services through the case management function.

Within this context, and across the arms of government, **it is difficult to imagine the widening of union and ward responsibilities for targeting, registration, case, and grievance management in a horizontal expansion scenario within the available resources**. Particularly with regards to targeting and registration, a separate team may have to be formed in cooperation with the DSS and DDM and other relevant functions of government, unless pre-validated lists were shared by external entities (e.g., partner NGOs).

Outreach activities, which are a critical component of any FbA intervention for their role in disseminating early warning messages and instructions on the recommended activities linked to the disbursement of emergency funds, are also a responsibility of the union administrative level. In the event of a shock, capacity within the DSS and DDM functions of the union office would have to be boosted via surge support from within government or in collaboration with civil society or non-governmental organisations operating in the area.

3.5 Other enabling factors and barriers within existing SSNPs

Knowing the barriers and particular enabling features of each of the five shortlisted SSNPs can help qualifying them as able to host a forecast-based activation and determining the best design options and set-up process. During the May 2022 consultation workshops, the following initial assessment criteria were used to assess them:

- Existence of a mandate for disaster response.
- Flexibility in terms of implementation guidelines & funding.
- Ability to roll-out a timely, adequate, and reliable response through current processes and capacity.
- Capacity in terms of system for implementation.
- Database.

The evidence was consolidated, corroborated by additional findings from recent literature and new first-hand information, to identify the most critical enabling factors and barriers to the activation of FbA through the five schemes, outlined below.

3.5.1 The OAA, WA and DA programmes

The three schemes managed by the DSS at the MoSW (OAA; WA and DA) present several common features, which allow a joint assessment of their suitability of FbA integration.

Table 4 - DSS programmes' features (source: World Bank, 2019d, 2021; Ministry of Finance, 2022)

Key programme features
• **Ongoing schemes / shock-triggered / forecast-based:** Ongoing scheme   • **Conditionality:** No.   • **Annual Budget:**   OAA: BDT 34.4 (US$ 31.8 million) in fiscal year 2022-2023.   WA: BDT 14.9billion (US$ 13.8 million) in fiscal year 2022-2023.   DA: BDT 24.2 billion (US$ 22.4 million) in fiscal year 2022-2023.   For all three schemes, the ministry has the right to allocate a special quota for disaster prone areas and to keep 10 per cent of the total allocation for emergency beneficiary selection and distribution.   • **Enrolment:** For DA, the Deputy Director or USSO (rural) and DSSO (urban) shall register   all PWDs living in that District and maintain a registration book. The DD will provide ID cards to The registered persons. For OAA and WA, applications can now only be submitted online. After verification and validation by union representatives, the Upazila Committee (rural) and the District Committee (urban) finalize the list of potential rural beneficiaries and a waiting list and seek approval of the local Member of Parliament.   • **Payment schedule and modality:** Monthly (DA) or Quarterly (OAA, WA) via a combination of bank-based and mobile money via agents.   transfer.   • **Cash-out modality:** either at a bank branch or via mobile money agents in the community.   • **Data management:** via a software-based MIS accessible at national and upazila level.

ENABLING FACTORS

The existence of a mandate for disaster response and budget allocations. The 2022 addendum makes provision for an emergency scale-up to distribute cash allowances as relief, recovery, and rehabilitation assistance in case of a shock. The addendum does not however prescribe the source of funds other than the existing programme allocations from the MoSW, although it opens the way to additional, unspecified government allocations (Ministry of Social Welfare, 2022). The available budget for emergency allocations is equal to the 10 per cent of the overall envelope for all three schemes. Since, the total annual budget for OAA amounted to approximately BDT 26 billion (US$ 311 million) in the fiscal year 2019-2020 (World Bank, 2019d), a seasonal flood response could count on a considerable volume of transactions at a hypothetical BDT 4,500 transfer rate, should a FbA pilot be activated using government funds.

Implementation flexibility except on targeting criteria. The relevant programme governing authorities retain the responsibility to make decisions regarding the geographic coverage, implementation period, exact budget allocation, payment schedule, transfer value. All three schemes are active in rural areas in all districts and upazilas of the country, which gives great flexibility during emergencies. **Payments run all-year-round on a quarterly basis, which offers opportunities for lumping payments or shifting the payment dates in line with early warning communication without impacting on other poverty alleviation and consumption objectives of the three schemes.** The three programmes' transfer values are generally quite low to ensure broad coverage within the available fiscal space as opposed to matching national poverty, income, or

consumption parameters. Hence, vertical expansions of the schemes would be critical, to guarantee adequate resources for protecting against an imminent flood.

Efficient digital data management. The DSS is one of the first government departments to implement a software-based MIS for all three programmes, including information about eligible yet unsuccessful applicants recorded in a separate waiting list (KII, 2021/2022). The system covers the entire spectrum of functions from application to payment, due to the existing linkages at both end of the data flow, with an online application platform and with financial management and payment applications of the Finance Division. Through this last application, payroll files can efficiently and safely be sent to the financial institutions tasked with making the payments, *de facto* digitalizing the entire process.

Since the pandemic period, a wholly digital application process has been established to replace the old system handled by the USSOs and DSSOs. Currently, citizens wanting to enrol in any of the three schemes can only do so online. What could be perceived a barrier to access, due to the rural vulnerable groups' socio-economic and digital literacy status, has so far been managed by activating numerous digital support service points at upazila and union level to enable even the most vulnerable applicants to register online.

Following application, personal data on potential applications is pooled in different lists, which go through digital validation with minimal manual interaction. The excel-based beneficiary registries previously stored at different administrative levels for management and oversight are now digitally managed, with clear benefits in terms of data management transparency and error-control. The lists can still be easily downloaded and shared withing government departments and externally with third-party implementing agencies, provided that appropriate data protection and sharing agreements are in place.

Beside optimizing the operational platform for a correct management of citizens' data, data protection through the definition of data protection and sharing guidelines are a critical prerequisite to initiate responses involving the transfer of sensitive information outside of the DSS. For instance, in the case of a horizontal expansion of caseload supported by data from other ministries of non-governmental entities, strong data sharing agreements must be developed at design stage. Box 2 presents the minimum information to be included in this type of agreements, in absence of a ready-made government template.

Box 2 - Data sharing agreement template

Example of data sharing agreement
Purpose of Agreement: Describe the purpose of the data sharing agreement between the providing entity (government ministry, organization etc.) and requesting entity. Describe why the sharing initiative is necessary, objectives and benefits the requesting entity hopes to achieve.
Duration of Agreement: Describe length of agreement between the two parties.
Description of Data: Describe the data being provided in this agreement, the features of the dataset that make it particularly sensitive, referring to any data protection law, government policy or relevant guidelines.
Property and rights of utilization: Define the data property and outline the terms of utilization by the entity bound to the agreement.
Data Access: Describe how data will be physically transferred. Include individuals or groups of individuals that will have access to the data. List the frequency data will be exchanged between the parties.

Example of data sharing agreement
Data Security: Describe security measures around transferring, accessing, and storing data.
Termination of Agreement: Describe why and how the agreement can be terminated (verbal/writing, length of notice before termination), and what needs to happen once termination of services is provided by either entity (documents returned to providing entity or destruction of documents – deleted from hard drives, shredded, burned, etc. by requesting entity).

BARRIERS

No targeting flexibility. The enrolment quotas in place across all three programmes offer opportunities for an immediate expansion of caseloads to the households on the waiting lists in the case of a shock, including for an FbA response. A caseload expansion to these "reserve" beneficiaries would be immediately possible due to their compliance with programme eligibility criteria and the availability of ready-made lists, some of which are digitally recorded.

However, the emergency allowance mentioned in the 2022 addendum can only be released to new beneficiaries identified in compliance with the three schemes' targeting criteria, as expressed in the current programme implementation policies (Ministry of Social Welfare, 2022). This is a clear barrier to the inclusion of other climate-vulnerable groups through a horizontal expansion, who do not meet the programme eligibility criteria.

Decentralised targeting and enrolment systems at risk of bias and corruption but offering opportunities for frequent data verification and update, with sufficient capacity provided. A national social registry, the National Household Database (NHD) managed by the Bangladesh Bureau of Statistics (BBS), contains the list of all households and their socio-economic characteristics. The NHD was populated in 2018 but it is yet to be operationalised in targeting SSNPs. Self-selection or identification done at village and union level, for rural areas, is still the leading targeting mechanism for the three programmes. Registration and enrolment are therefore decentralised processes starting at the ward level and formalized by the USSO, for rural areas.

Despite being prone to errors and cases of corruption and nepotism (World Bank, 2019 a, b, d), the decentralized targeting system enables the continuous collection and update of data, which is consolidated in multiple lists – a list of approved beneficiaries remaining enrolled until their death, and a waiting list – and which can constitute a valuable baseline for targeting during recurring shocks. Although the current datasets do not include information on climate vulnerability that can be used to target in case of a shock (KII, 2023), the household structure, contact details and geolocation could at least help the targeting teams to quickly identify beneficiaries living in areas at risk of floods and conduct further verifications of their vulnerability. Unfortunately, not all information is currently collected by the programmes under assessment as part of their registration process, nor separate lists of vulnerable households exist outside of programme registration processes.

Weak outreach and grievance management services. In absence of effective media penetration in rural communities, communication is mostly channelled through local religious institutions, word of mouth and public address systems installed on vehicles moving around the communities, with varying level of success. With regards to grievance redress management, despite some attempts to upgrade and modernize the system through an online platform and a pilot engagement of civil society organizations and citizens to collect grievances and process grievances (World Bank, 2019d) – cases across the three programmes are still largely handled by programme staff at local level,

mainly the Union Committees. Beside representing a serious conflict of interest given that these committees are those undertaking identification and enrolment activities, case management is also very time-consuming and requires dedicated, well trained, and equipped teams.

Furthermore, emergency communication and grievance redress management represent a critical test of the service quality and a necessary channel for communicating programme operations instructions and delivery challenges in times of crises. Particularly when having to trigger one-off payments to new beneficiaries which are not part of the current programme caseload, effective outreach activities and independent grievance redress management are essential to ensure timely, effective access to one's entitlements.

3.5.2 The Employment Generation Programme for Poorest

Table 5 – EGPP key programme features (source: World Bank, 2019c; Ministry of Finance, 2022)

Key programme features
• **Ongoing scheme / shock-triggered / forecast-based:** Ongoing scheme
• **Conditionality:** Yes, public work. The programme is currently implemented in two phases: i) 40 days between October to December, ii) 40 days between March to April.
• **Annual Budget:** BDT 18.3 billion (approximately US$ 16.9 million) in fiscal year 2019-2020 (World Bank, 2021).
• **Enrolment:** Self-selection, eligibility assessment at Ward level based on poverty status. The Union Committee approves the list of beneficiaries and identified sub-projects, followed by the Upazila Committee. The approved lists are sent to the District Committee for final approval.
• **Payment schedule and modality:** via a combination of bank-based and mobile money using agents.
• **Cash-out modality:** either at a bank branch or via mobile money agents in the community.
• **Data management:** No registry, digital beneficiary list.

ENABLING FACTORS

Strong focus on resilience building and assets restauration. Among the five schemes under assessment, the EGPP is the only one explicitly advocating for resilience building and a climate-smart watershed management approach through activities aiming at restoring household livelihoods through paid work and at rehabilitating community assets through labour-intensive work. The model is in theory compatible with an FbA approach made of a cash component and activities turned to the protection of individual and community assets from shocks.

Furthermore, an ongoing World Bank funded pilot in five districts – the EGPP+ - is looking at generating evidence on a more flexible use of the public works approach across a variety of shocks, target groups and, most importantly, as a FbA intervention to *"prepare households for an imminent high impact hazard"* (MoDMR, 2020). The pilot offers a good entry point for the FbA/FbF Taskforce and other actors willing to explore the institutionalization of the approach in one SSNP to learn about good practice and challenge in implementation, should an ex-ante response be activated at a future date.

The ongoing EGPP+ pilot
In 2020 a more shock-responsive version of the EGPP was designed by the World Bank in collaboration with the MoDMR and approved for piloting in five districts in Bangladesh, including districts prone to seasonal floods.
The EGPP+, rolled out between 2021 and 2023, represents an attempt to broaden the programme scope to offer cash-based assistance in case of different types of onset shocks (including floods) and to support different groups beyond the able-bodied citizens targeted by the government programme. The pilot's objectives are related to food security and limiting negative coving practices after a **shock but also to community preparedness, risk mitigation response and recovery. (MoDMR, 2020). Additionally, the EGPP+** temporarily **replaces the ordinary scheme with a "controlled flexibilization" modality – namely an array of implementation options depending on the type of shock and needs - that can be implemented throughout the year as opposed to being restricted to the October-April period (Ibidem). The pilot also opens the way to unconditional, forecast-based transfers for households at high risk** of floods (Ibidem.).
The National Steering Committee acquires additional responsibilities to determine the policy and technical parameters through which the program can be implemented based on the information provided by the National Disaster Management Council and in line with the options presented in the programme guidelines.
The work conditionality remains but is extended to community service and self-help work, meaning activities carried out within one's respective home to improve household resilience.

Presence of electronic record of enrolled and eligible households across programme cycles. Unlike the other SSNPs under the DDM which currently operate manual data management systems, the EGPP has a centralised beneficiary-level digital information systems, which keeps track of current and past programme beneficiaries and is linked to the election commission database via the NID. In some upazilas, non-digital records of eligible but unsuccessful beneficiaries are also present (KII, 2021-2022). A MIS is currently under development for some SSNPs, including EGPP, to include a shock responsive module enabling *ad hoc* payments and vertical and horizontal expansions of beneficiaries (KIIs, 2021-2022). Furthermore, the programme manages a database for sub-project specific environmental screening and environmental management plans, which can be useful when integrating cash distribution with other environmental protection activities in disaster preparedness.

This wealth of data for one of the largest programmes in the country, which has surpassed one million beneficiaries in the 2019 fiscal year alone, represents a precious asset for humanitarian actors working towards mitigating the risks related to seasonal floods. If supported by an adequate MIS able to translate such data into scale-up instructions for the EGPP, the data could well be utilized to disburse cash in response – or anticipation – to other onset shocks.

BARRIERS

Even in presence of a shock-responsive vocation, the scheme has very distinct workfare features, which prevent it from being flexibly used to respond to several types of shock, such as floods arising during the Monsoon season. This public workfare programme was designed to address the cyclical dry season shocks endured by a substantial portion of the rural communities of the country. It is active every year in extremely poor districts and upazilas during the Lean Season,

which runs between September and January. The programme has a national Steering Committee charged with decision making around the geographic location, budget allocation, implementation period, target population, coverage, transfer value, and type of sub-projects to be deployed.

Although some level of flexibility to do with activation periods, budget allocations, and target caseload is granted by the work done by the Steering Committee, the rules on activation, targeting, work conditionalities and implementation schedule are fixed and in contrast with an FbA response. As such, the design does not come with flexibility in terms of use of the programme to respond to different types of onset crises, including floods.

The workfare conditionalities hamper the possibility of an ex-ante activation, either unconditional or related to risk mitigation activities, which are currently not enlisted among the possible sub-projects. The related payment plan is dependent on the number of work-days accumulated by each beneficiary, and it requires several administrative steps for wages to be determined and released, in apparent contrast with the time-efficiency requirements in a shock response. The activation period excludes the entire Monsoon period, in which floods are likely to manifest and cause damage in riverine and coastal areas. Finally, transfer values are standardized across all households and purposefully low (at BDT 400 per day) to fall below the labour market rates and prevent negative incentives to its access by rural poor.

Geographic targeting based on poverty maps with no climate vulnerabilities criteria considered. Due to budget limitations, not all districts and upazilas are included in the programme. Targeting caps are in place based on the government poverty mapping system, which categorizes upazilas depending on the magnitude of poverty (proportion of affected population) using the country upper poverty line and data from the Household Income and Expenditure Survey (HIES) and the Population and Housing Census (PHC). The results, and consequent upazila selection, are based on estimated household consumption with no reference to other parameters – such as ownership of assets or housing conditions - which could widen the spectrum of vulnerabilities covered by the programme. The stubborn persistence of poverty in Bangladesh is further intensified by recurring natural disasters it faces, which not only hinder economic advancements but also undermine the resilience of impoverished households. Therefore, the programme's targeting approach could be better aligned with the flood vulnerability and impact maps generated by the Flood Forecasting and Warning Centre (FFWC) in collaboration with the SUFAL programme to support the permanent integration of an FbA component. Overall, the current programme's partial geographic coverage can be an obstacle to its scale-up ahead of a crisis in those areas most at risk of floods but not considered among the poorest in the country.

3.5.3   The Gratuitous Relief Programme

Table 6 - GR key programme features (source: KII)

Key programme features
• **Ongoing scheme / shock-triggered / forecast-based:** Shock-triggered
• **Conditionality:** No.
• **Annual Budget:** Budgets have been growing exponentially over the years. In the 2018-2019 fiscal year it reached approximately BDT 5,41 billion (almost US$ 52 million), but only BDT 98 million were distributed in cash; in the 2019-2020 fiscal year the budget reached BDT 14,16 billion (approximately US$ 134 million). No breakdown of cash versus food expenditure is available from Ministry of Finance data.

- **Enrolment:** Selection and registration of beneficiaries by the Ward, Union/City Corporation committees. Lists verification by the upazila and district administration. Consolidation by the DRR.

- **Payment schedule and modality:** Flexible schedule depending on the type of emergency. Manual distributions of cash and food items.

- **Cash-out modality:** manual by the ward committees/union committees.

- **Data management:** paper-based.

ENABLING FACTORS

Existence of a mandate for disaster response and pre-allocated funding. The scheme is the main government humanitarian instrument to respond with cash or food-based assistance, as shown during the COVID-19 crises between 2020 and 2022. The programme is a fully government funded scheme guided by the Humanitarian Assistance Programme Implementation Guidelines 2012–2013 (MoDMR, 2012). The decision to activate the GR can be taken as often as monthly based on the advice of different high-level government authority, including district Deputy Commissioners (DC), who are mandated to assess the situation.

DDM has a leading role in providing the analysis of a particular shock and in determining the geographic target of the programme, based on a categorization model in line with the level of risk or impact. During the COVID-19 crisis period districts were categorized using a class-based model, which looked at criteria such as population, poverty rate, number of upazila and unions in the districts, etc. The district and lower-level administrations can deliberate on the target upazilas, unions and wards based on demand, poverty rates and availability of funds and after approval by the DC (2023 KII with the Director of Relief at the MoDMR). District level funding is pre-allocated, and the DC has the authority to request the activation of a GR intervention (2023 KII).

The programme can be used to respond to any type of shock requiring extensive food or cash support and was already used for responding to flood emergencies (KII, 2023). Furthermore, despite no explicit reference to anticipated action in any of the guidance documents, the GR support instrument was activated and disbursed ahead of a shock - for example during the pandemic response - based on vulnerability mappings and forecasts (KII, 2023). Evidence from past experiences could easily support the institutionalization of forecast-based cash disbursements through the GR scheme via a change in policy and implementation guidance.

Flexible targeting criteria and bottom-up identification process. Beside the adherence to standard means-testing parameters for targeting (vulnerability, income, and land ownership, among others) like all other four assessed schemes, the programme includes elements of shock vulnerability *"during and immediately after a disaster event"*. Furthermore, the Humanitarian Assistance Programme Implementation 2012-2013 guidelines instructing on the GR programme parameters opens to *"any other individuals/families/communities under this assistance in response to emergency/necessity"*, which the government may want to include (MoDMR, 2011). This is compatible with a humanitarian response to floods, where additional climate-vulnerability considerations may come into play, though not associated to an FbA programme design.

Based on a targeting model which prioritizes underprivileged families affected families by disasters, Union Committees and Ward administrative staff are responsible for identifying the most vulnerable households to be enrolled in the scheme. No targeting cap is in place and the number of beneficiaries for any given activation is also decided by the local administration/committees. In emergency situations requiring a profound understanding of the local environment and needs, as

well as the necessary authority to extend beyond policy guidance for cash-based interventions' targeting criteria, this frontline role of the local authorities is an appropriate policy choice. Although presenting clear risks of bias during the selection process, **local committees can be quick as identifying the most affected households and be held accountable for their choice and for a timely communication with the communities.**

BARRIERS

Overreliance on the food instrument. Pre-COVID funding levels for GR in the 2018-2019 financial year reached BDT 5,41 billion (almost US$ 52 million), out of which only BDT 98.5 million were disbursed in cash to recipients, that is less than 2 per cent (Ministry of Finance, 2019; KIIs 2021-2022). The pandemic response partly changed the balance of food and cash disbursed to vulnerable households, with GR-cash becoming one of the key response mechanisms throughout the 2020-2021 period. In the financial year 2019-2020, at the start of the COVID/19 pandemic, the revised budget for GR-food was BDT 14.1 billion where the original budget for the GR food was BDT 5.4 billion that year (Ministry of Finance, 2022). However, In the following fiscal year, 2020-2021, the original budget for GR-food was BDT 30 billion, but the actual spent funds turned out to be only BDT 2 billion (Ibidem.).

The Ministry of Finance data shows the predominant use of food as a shock response instrument. While being a reasonable approach in cases of early onset disasters, where access to market is strongly affected, cash may be an appropriate response to FBA and but lack of sufficient funding for GR-cash risks affecting the government's capacity to respond to seasonal floods, which can be perfectly tackled through a cash and forecast-based strategy in a more cost-efficient manner.

A way to achieve a permanent change in perspective can be the generation of practical evidence - through localized pilots - on the cost-effectiveness and suitability of cash and the FbA model in response to seasonal floods.

Box 4 - Required empirical research for evidence generation.

Evidence generation to support the FbF/FbA strategy development
More empirical research is required to demonstrate the effects of cash-based FbA and attract more government interest and action. Process evaluations and outcome analysis performed on different integration options can contribute to the existing evidence on: • Efficient EW models and governance. • Competing DRF models. • Optimal institutional set-ups and policy frameworks for FbA. • Overall cost-effectiveness of the FbA model. • Household outcomes. • Livelihood protection outcomes and alignment with other sector or geographic specific initiatives. • Cost-efficiency of targeting, registration/enrolment, data management, governance, coordination, information, case management etc. The empirical research activities can be supported by scenario modelling to generate more evidence on the cost-effectiveness of FbA compared to ex-post responses in flood situations.

Weak case and grievance management system in place – The case and grievance management systems are extremely weak and prone to bias and low uptake by programme beneficiaries. All grievances must be presented to the union level committee, which is equally involved in everyday implementation activities, including payment operations. As shown in different studies on the subject the lack of an independent team to collect and management grievances and the reliance on the same implementing teams for this function is one of the first barriers to reporting (The International Policy Centre for Inclusive Growth, 2016).

Paper-based database and little capitalization of information used during each activation: No digital registry nor MIS exist for the programme, and this can prevent proper management of the cash distribution mechanism as well as affect the capacity to capitalize from past experiences in the case of recurrent crises like floods. Paper registries are usually stored at the upazila level without centralization of the information nor analysis. Poor data management is a barrier to the effective activation of an emergency response, more so if it is anticipated, since it can lead to errors or manipulations, and it can make case management and monitoring very burdensome.

4   Proposed phased approach for integration

Summary of section content

The phased approach presents three stages of progress towards an institutionalized integration between forecast-based emergency response and existing large-scale, government led SSNPs:

Phase 1 – Systems strengthening of routine social protection systems and evidence generation: *This phase represents the status quo in terms of development of a FbF/FbA Strategy, structure, and operations within the five SSNPs and funding availability (from government as well as donors). This phase is primarily dedicated to generating the necessary evidence to feed into the strategy and to encourage government ownership in the next phases. Systems strengthening activities are already ongoing within DSS and DDM (e.g., the digitalization of data management and payment systems).*

Phase 2 – Systems strengthening and government pilots: *In this phase progress has been made by the FbF/FbA taskforce in defining key parameters such as a governance structure for FbF/FbA, a targeting strategy for flood FbAs, transfer values and funding sources. Also, a team tasked with the mainstreaming of social protection in all DRR plans has been created at the DDM. A FbF/FbA strategy is not yet in place, but dialogue between the government and non-governmental invested partners has taken place to lay down the foundations for one or more large-scale, partly government-funded pilots. Additional systems enhancement projects must be prioritized, such as a modernization of case/grievance management, better outreach services, financial literacy as well as an update of all implementation structure and protocols with related documentation.*

Phase 3 - FbA institutionalization and permanent integration solutions: *This final phase takes place after the finalization and endorsement of a FbF/FbA Strategy, including options for integration with SSNPs. The key strategic objectives are institutionalised via policy revision and the issuance of specific addenda to existing guidelines. The programmes all have strong, shock-responsive systems and protocols in place that enable the design of permanent integration solutions using the most suitable schemes.*

The development of FbA in Bangladesh will be an iterative process, the success of which will be dependent on the strengthening of the routine social protection system for it to be robust enough to leverage for FbA. The following activities will need to be developed simultaneously for the success of FbA:

1. **Ensure that routine social assistance mechanisms target poor and vulnerable beneficiaries with timely and predictable transfers**, that has robust coverage and adequacy thereby building resilience to shocks.

2. **Adaptations to programming and delivery mechanisms are agreed and implemented ahead of shocks,** including financing mechanisms, capacity building, adjustments to operating procedures, integration within wider national and local plans for disaster response and strengthening of coordination structures. Preparations can help ex-ante emergency assistance to rapidly scale-up as and when required, using established social protection systems. Prominent FbA adaptations include increasing transfer values and/or caseloads to support those affected by shocks. These "shock responsive" mechanisms which target the poorest and most vulnerable households affected by shocks should ideally be part of a system that also builds resilience to shocks and ultimately reduces the caseload for humanitarian interventions, which may still be required for large-scale responses to shocks.

The Table 7 below illustrates the steps required to move FbA forward, including the requisite system strengthening and institutionalisation of legal and regulatory frameworks, processes, and agreements. The analysis supporting the definition of this phased approach was carried out from the qualitative data on enabling factors and barriers presented in the previous sections and in line with the vision expressed by the Government of the People's Republic of Bangladesh of making FbF/FbA a constituting part of the country's disaster management system. Implementing the proposed phased approach relies on the necessary political will and capacity within MoDMR and MoSW, including the FbF/FbA Taskforce groups and Steering Committees that they chair, to coordinate the work required to fulfil the vision set out in the 2019 SOD, 2022 Addendum and FbF/FbA Strategy under development.

The phased approach is made of three distinct phases, with an overall timeline of no less than 5 years due to the policy changes required to institutionalise FbA as a government emergency response tool. Each phase outlined in the table has an indicative timeline (expected number of years to be completed), which is also tentative and highly dependent on the quality and outcomes of the institutional dialogue and coordination efforts made by relevant stakeholders. The three-phased process is designed to allow time for the completion of the ongoing policy work, systems strengthening and the amendment of programme implementation guidelines in line with the identified options for integration. Finally, the phased approach points to key actions that can be taken forward by interested parties – including the SUFAL II consortium – to lead the process forward while meeting the humanitarian needs arising each year.

Based on the rapid analysis presented in previous sections of this report, **all five SSNPs show some potential for hosting FbA activations as part of their core mandate and operational framework,** based on distinctive design features or operational features.

- **The OAA and WA and DA**, being continuous, scalable programmes supported by digital systems, are the best candidates for vertical and horizontal expansions as a government pilot and permanent integration option. **In the short-term, their beneficiary lists can be shared externally** to encourage a harmonization of targeting approaches with external humanitarian responses including FbAs. **Government pilots can be activated in the medium-term using the available pre-allocated funding**, based on a plan including the definition of FbA targeting protocols and transfer values, and the adaptation of the programmes' operational structure to accommodate an expanded caseload, the in case of horizontal expansions. **A permanent refocusing of these programmes' mandate and operational platform** can be considered in the long term, due to the existing policy backing (especially the 2022 Addendum) and universal targeting plans (for OAA and WA). This option requires a careful review of the operational systems and protocols underpinning the delivery of all three schemes to identify any further barrier to an FbA activation.

- **The EGPP**, as currently implemented across most districts in Bangladesh, utilizes an articulated workfare design which makes it unsuitable for emergency scale-ups without **substantial design changes** (such a revision of its implementation schedule), a temporary waiving of its conditionalities or by extending the workfare feature to include anticipated action that can be completed within a few days ahead of a flood. However, the programme has been piloting a more flexible shock-responsive model (the EGPP+, funded and supported by the World Bank), whose **lessons gathered during its two-year implementation can be used to re-design the EGPP to be more shock-responsive in the future.**

- **The GR** is a completely flexible instrument that can be used to design a separate, government owned "flood cash-based FbA response mechanism" to be regularly triggered in anticipation

to floods. **In its current form, the instrument is not fit for a quality response** due to its largely manual operational platform. However, its decentralized funding structure and management at district level provides leveraging opportunities, if supported by policies allowing a localized response to be triggered. **However, the instrument requires extensive systems strengthening work**, which can only be pursued with political and economic buy-in from MoDMR, and with technical assistance from the FbF/FbA Taskforce and participating actors.

With regards to the policy environment, the phased approach proposes a progressive removal of all barriers to the institutionalization of FbA, mainly through mandate and work of the FbF/FbA Taskforce. In the first and second phase, efforts may be put into piloting and costing different integration options to generate evidence and proof of concept that can feed into the Taskforce's strategy development efforts. Meanwhile, a disaster risk financing or forecast-based financing strategy can take shape, with an initial support from donors and international implementing agencies paving the way for more government ownership in the years to come. Whilst awaiting the development and roll out of an FbF strategy, existing emergency funding allocations in place for the OAA, WA, DA and GR can be released to respond to FBA needs.

Table 7 - Phased approach for FbA/SSNP integration

Phased approach for FbA/SSNP integration		
• **Phase 1 - Approximately 2 years (2023-2024) - mostly donor funded pilots.** *This phase represents the status quo in terms of development of a FbF/FbA Strategy, structure, and operations within the five SSNPs and funding availability (from government as well as donors). This phase is primarily dedicated to generating the necessary evidence to feed into the strategy and to encourage government ownership in the next phases. Systems strengthening activities are already ongoing within DSS and DDM (e.g., the digitalization of data management and payment systems).*		
PROGRAMMATIC OPTIONS (listed from the least to the most process-intensive)	**Option 1. Use of current OAA/WA or EGPP beneficiary lists appropriately cleaned and verified.** in donor funded FbA intervention, implemented as a standalone programme by a non-governmental or international organization (e.g., SUFAL II). The beneficiary list can potentially be expanded to other shock-vulnerable households, identified, and enrolled by the implementing agency.	*System strengthening conditions: Complete, up-to-date, digital list of OAA/WA beneficiaries with geolocation and contact information. Capacity at Ward level to support household verification and data cleaning activities. Active bank accounts.*	*Key actors: implementing agency; DSS/DDM.*
	Preparatory activities: a) upazilas/unions identification based on early warning data from the national meteorological agency (implementing agency); b) funding allocation; c) data filtering and cleaning based on risk locations and other parameters (DSS); d) signature of a data sharing agreement between the DSS and the implementing agency; e) digital or encrypted/password protected electronic transfer of beneficiary data to implementing agency (DSS); f) data verification by the implementing agency (via phone or through household visits); g) data validation and use by the implementing agency; g) outreach activities.	*Outcome: Inclusive FbA pilot targeting very vulnerable households; evidence on DSS enrolment and registration process quality, data quality and record keeping, coordination within DSS and with external partners, communication with DSS. Evidence on impact of cash based FbA.* **Limitations/risks:** *exclusion of the extremely vulnerable unable to apply for the scheme; no evidence generated on the suitability of the SSNP systems to implement an FbA.*	
	Option 2. Pilot ex-ante vertical expansion (with transfer schedule realignment, where needed) of the most inclusive programmes active in flood prone areas, i.e., OAA, WA and/or DA (DSS). More than one programme can be scaled-up at the same time.	*System strengthening conditions: government approval of the pilot; donor funding for the VE; digital, flexible systems able to support a vertical scale-up of the programme.*	*Key actors: DSS*

	Preparatory activities: *a) upazilas/unions identification based on early warning data from the national meteorological agency (implementing agency); b) funding allocation; c) data verification (if needed, via phone or through household visits); d) data validation and system recalibration (payment, data, case, and grievance redress management etc.); e) outreach activities.*	**Outcome**: *Inclusive FbA pilot targeting very vulnerable households; evidence on DSS VE system applied to the OAA or WA programmes. Evidence on impact of cash-based FbA.* **Limitations/risks**: *exclusion of the extremely vulnerable unable to apply for the scheme.*	

- **Phase 2 - Approximately two years (2025-2026) - government-funded pilots.**

  In this phase progress has been made by the FbF/FbA taskforce in defining key parameters such as a governance structure for FbF/FbA, a targeting strategy for flood FbAs, transfer values and funding sources. Also, a team tasked with the mainstreaming of social protection in all DRR plans has been created at the DDM. A FbF/FbA strategy is not yet in place, but dialogue between the government and non-governmental invested partners has taken place to lay down the foundations for one or more large-scale, partly government-funded pilots. Additional systems enhancement projects must be prioritized, such as a modernization of case/grievance management, better outreach services, financial literacy as well as an update of all implementation structure and protocols with related documentation.

P R O G R A M M A T I C O P T I O N S (listed from the least to the most process-intensive)	**Option 1. Pilot ex-ante vertical expansion** (with transfer schedule realignment, where needed) of the most inclusive programmes active in flood prone areas, i.e., OAA, WA and/or DA (DSS). More than one programme can be scaled-up at the same time.	**System strengthening conditions**: *government approval of the pilot; donor and government funding for the VE; digital, flexible systems able to support a vertical scale-up of the programme.*	**Key actors**: *DSS, Finance Division for approval of the additional funding*
	Preparatory activities: *a) upazilas/unions identification based on early warning data from the national meteorological agency (implementing agency); b) approval and allocation of the additional funding for the VE by the Finance Division and/or donor involved; c) data verification (if needed, via phone or through household visits); d) data validation and system recalibration (payment, data, case, and grievance redress management etc.); e) outreach activities.*	**Outcome**: *Inclusive FbA pilot targeting very vulnerable households; evidence on DSS VE system applied to the OAA or WA programmes. Evidence on impact of cash-based FbA.* **Limitations/risks**: *exclusion of the extremely vulnerable unable to apply for the scheme. Getting approval of additional funding at the middle of a fiscal year may be difficult under the current practice, advance approval of the additional fund from the FD can address this barrier.*	
	Option 2. Pilot activation of a GR-Cash designed as a tailor-made cash-based FbA programme.	**System strengthening conditions**: *government approval of the pilot and instructions sent to the Deputy Commissioner for activation ex-*	**Key actors**: *DDM*

	ante; donor and government funding for the pilot; flood FbA targeting strategy and transfer value available; pre-registration of beneficiaries.	

Preparatory activities*: a) programme design; b) Strengthening of the key systems supporting GR-cash operations – registration, data management, payment, case and grievance management, outreach; c) targeting and pre-registration in areas prone to floods (at least 2 months before activation); d) target areas identification based on early warning data from the national meteorological agency; e) funding allocation; f) enrolment; g) outreach activities.*	***Outcome****: Inclusive FbA pilot targeting the households most at risk based on a specific targeting strategy; evidence on impact of cash-based FbA.* ***Limitations/risks****: without a complete reset of the programme's operating systems, the FbA initiative risks suffering from severe inefficiencies and lack of transparency in the delivery of cash assistance.*	
Option 3. Horizontal expansion (with vertical expansion and transfer schedule realignment, where needed) of one scheme among OAA, WA and DA.	***System strengthening conditions****: government approval of the pilot; donor and government funding for the pilot; identification of a flood FbA targeting approach and source of data; government-funded surge administrative capacity at union level during Monsoon period; expansion of the mobile money payment technology to all districts in Bangladesh.*	***Key actors****: DSS, Finance Division for approval of the additional funding*
Preparatory activities*: a) Signature of data sharing agreement if data source is external to DSS; b) targeting and pre-registration of in areas prone to floods (at least 5 months before activation) if handled by DSS; c) beneficiary registration with service provider; d) upazilas/unions identification based on early warning data from the national meteorological agency (implementing agency); e) approval and allocation of the additional funding for the HE by the Finance Division and/or donor involved; f) enrolment; g) outreach activities.*	***Outcome****: Inclusive FbA pilot targeting the households most at risk based on a specific targeting strategy; evidence HE mechanism applied to DSS programmes, coordination within DSS and with external partners, communication with DSS. Evidence on impact of cash-based FbA.* ***Limitations/risks****: Poor coordination within and between ministries can affect or delay the targeting process. Getting approval of additional funding at the middle of a fiscal year may be difficult under the current practice, advance approval of the additional fund from the FD can address this barrier.*	

- **Phase 3 - Approximately two years (2027-2028)– institutionalized, government funded permanent integration solutions.**

<table>
<tr><td colspan="3">This final phase takes place after the finalization and endorsement of a FbF/FbA Strategy, including options for integration with SSNPs. The key strategic objectives are institutionalised via policy revision and the issuance of specific addenda to existing guidelines. The programmes all have strong, shock-responsive systems and protocols in place that enable the design of permanent integration solutions using the s can be designed and implemented through the most suitable schemes.</td></tr>
</table>

PROGRAMMATIC OPTIONS (listed from the least to the most process-intensive)			
	Option 1. GR-cash for flood FbA programme design.	**System strengthening conditions**: *FbF/FbA strategy completed and endorsed; Update of the government Humanitarian Assistance Programme Implementation Guidelines to include FbA and clarify the operational set up and implementation rules for GR-cash; Adequate funding allocated to GR-cash as opposed to GR-food .complete reset of the operational systems supporting the programme for an efficient and transparent delivery of cash to households in need; Digitalization of data management and payment processes;*	**Key actors**: *DDM, Finance Division for approval of any additional funding*
	Preparatory activities: *a) Consolidation of pilot learning and programme design; b) Operations strengthening (possibly including digitalization of information and payments); c) regular targeting and pre-registration in areas prone to floods (at least 2 months before activation); d) registration with payment service provider (PSP); e) target areas identification based on early warning data from the national meteorological agency; f) approval and allocation of the additional funding by the Finance Division; g) enrolment; h) outreach activities.*	**Outcome**: *Flood response FbA GR-cash design for activation when needed. Implementation guidelines integrated within an updated version of the Humanitarian Assistance Programme Implementation Guidelines.* **Limitations/risks**: *without a complete reset of the programme's operational systems and activation schedule/process, the FbA initiative risks suffering from severe inefficiencies and lack of transparency in the delivery of cash assistance.*	
	Option 2. Refocusing of one or more programmes among OAA, WA, and DA to permanently include a FbA component. The EGPP can also be considered if cash-based FbA is to be permanently associated with workfare, service provision and/or self-help activities promoted by the EGPP+ guidelines.	**System strengthening conditions**: *FbF/FbA strategy completed and endorsed; identified government funding sources; mobile money solutions integrated within the government payment system; identification and registration based on new targeting criteria*	**Key actors**: *DSS/DDM, Finance Division for approval of any additional funding*

	with regular verification/retargeting; government-funded surge administrative capacity at union level during Monsoon period expansion of the mobile money payment technology to all districts in Bangladesh.	
	Preparatory activities: *a) Align with the FbA/FbF strategy (governance, communication, targeting etc.); b) systems and processes enhancement (data management, case/grievance management systems; payment etc.); c) Increased administrative capacity at Union level. d) Revise programme implementation guidelines.*	***Outcome***: *Revised scope and operations to make the programme more shock-responsive by permanently including FbA among its ordinary scale-up options.* ***Limitations/risks***: *Limited resourcing and capacity within DSS/DDM and the programme implementation teams risks hampering the scale-up efficiency and efficacy.*

5   Conclusions and recommended next steps

This assignment intended to propose a set of options for permanently integrating FbA within one or more SSNPs, highlighting the necessary phases and steps for achieving it in the medium to long term. Table 7 in the previous section summarizes the most viable options at hand, sequencing them based on the level of readiness of the environment as well as the time-availability for designing quality pilots that can fulfil the dual expectations – life and livelihoods saving during a shock and evidence generation for increasing FbA/SSNP integration.

The proposed phased approach can be shared with relevant institutional players – particularly the FbF/FbA Taskforce – to initiate an institutional dialogue aimed at defining a roadmap for the permanent integration of FbF/FbA with ongoing social protection programmes in Bangladesh. Roadmaps are highly effective tools for directing complex, multi-year processes and are most successful when emerging from a process of consensus-building involving national and district government, development partners and donors.

This study also aimed at defining the critical steps for designing pilot programmes that can generate evidence regarding the five eligible programmes for furthering the integration of FbA and life-cycle social protection. Some recommended next steps for laying the foundations of government-led pilots during the upcoming Monsoon seasons - should the need arise - are the following:

1. **Geographic targeting and linkage with Early Warning system** - Identify districts/upazilas/unions at risk of floods based on early warning data from the national meteorological agency and historical data. Cross reference the data on flood vulnerability with the socio-economic profiles of those areas and the level of coverage of the five shortlisted schemes.

2. **Prioritize the definition of a targeting strategy for FbA** – As part of the FbA/FbF Taskforce mandate, the definition of a targeting strategy for flood FbAs should be prioritized. Following its endorsement by key ministries and departments, the strategy must be operationalised through existing programmes as well as DRM and local development plans at all levels.

3. **Identify government funds able to finance or co-finance the pilot** – the DSS 10 per cent emergency allocations are a starting point for attracting additional resources form MoDRM and interested donors. The government contribution should reach 60 per cent of the total budget and should include additional human and logistic resources for a quality delivery of all programme activities.

4. **Assess each programme's emergency funding release and cash-transfer processes** – The entire funding flow, which is where delays can mostly occur, must be adequately assessed to identify any possible bottleneck to the advance disbursement of cash. Any misalignment with the country's fiscal year must be addressed via appropriate means – e.g., buffer funds or multi-year allocations. Any barrier must be addressed via system strengthening and shock-responsiveness measures.

5. **Define data protection and sharing protocols** – the protocols should at least include information on the type of personal information that is processed by the social protection teams and systems and the purpose for such information; how long the information is retained; who has access to the information and how. The protocols should critically include a data

sharing agreement template for shock-responsive social protection programmes, including FbA.

6. **Systems and processes enhancement** – The systems for beneficiary identification and application, data management, case, and grievance management; and payment must be thoroughly assessed from an equity, efficiency, sustainability, and shock-responsiveness perspective; they should be strengthened and, where possible, digitalized, and integrated.

7. **Pursue the harmonize the payment system for DSS programmes** - To ensure the same level of service of all OAA, WA and DA beneficiaries across districts in Bangladesh and to offer a variety of cash-out options through a fully interoperable infrastructure, a harmonization of the current payment modalities (bank and MFS-based) should be considered. All beneficiaries at risk of floods or other recurrent shocks should be able to access agent-based cash-out services in their village.

8. **Define resource needs during scale-ups –** An accurate assessment of the resources needed to successfully scale-up the five shortlisted schemes ahead of a shock should be prioritized. Plans to increase the administrative capacity at all levels of programme implementation and oversight must be drawn based on the assessment's findings. DDM and DSS should consider the temporary allocation of resources for a separate pilot programme management unit.

9. **Definition of a sound M&E strategy, including a VfM component, for the pilots -** The M&E framework and plan should include both quantitative and qualitative analysis through process monitoring/evaluation and post-distribution monitoring.

10. **Initiate a participative process for the design of the pilots** – Using the FbF/FbA Taskforce forum or creating new better-suited interdepartmental coordination structures, a participative process of pilot design can leverage the knowledge and experience of key government and international actors that have worked with the FbA model before.

Finally, recommendations for the SUFAL II consortium to consider when designing its flood FbA pilot were formulated. These are available in Box 5 below.

Box 5 - Recommendations for the SUFAL II consortium

Recommendations for the SUFAL II programme team

The SUFAL II project is proposing to make use of the GR and EGPP schemes for piloting and testing integration of forecast based action in 2023 Monsoon. The consortium intends to design a tool will to identify most vulnerable people from the existing beneficiary database, using its in-house expertise with *"adaptive capacity, inundation and settlement mapping and analysis"* to identify the best targeted wards and distribution beneficiaries for cash grant.
 	
The proposed key activities for the pilot are:
    I.   beneficiary pre-selection using the beneficiary identification tool in consultation with upazila-level administration.
   II.   linking the SSNPs to appropriate triggers in the Early Action Matrix.
 III.   linking the SSNPs to union-level disaster management plans.

Recommendations for the SUFAL II programme team

In line with the analysis and phased approach presented in this document, the operational options available to the SUFAL II team are:

Option 1 – Design a pilot FbA GR-cash for the flood response, supporting with beneficiary identification but relying on the existing GR delivery platform. In fact, the historical beneficiary record of the GR programme is not up-to-date nor digitalized, therefore a fresh identification will have to take place based on impact maps generated by the SUFAL II programme. The consortium may want to provide additional resources and support in the areas of outreach, case management and M&E. This option would generate valuable evidence on the suitability of the current GR model for FbA initiatives. However, setting-up the pilot may require several months.

Option 2 – Temporarily waive key design features of the EGPP (conditionalities and programme schedule) to make use of its operational platform – beneficiary lists, payment, and case management system – to deliver anticipated cash to the flood-vulnerable households already enrolled into the programme. Through a robust M&E system, this option could provide evidence on the outcomes at household and community level, on the efficiency of programme operational systems, and it could point to the design changes required to permanently integrate an FbA component as part of the programme's strategy.

Option 3 -Should neither of the two proposed options receive favourable feedback from the MoDMR, the programme may resort to engaging with the MoSW and DSS to support a vertical expansion of any of its three shortlisted schemes. Through a robust M&E system, this option could equally provide evidence on the outcomes at household and community level, on the efficiency of programme operational systems, and it could point to all design changes required to permanently integrate an FbA component as part of the department's strategy. It could also generate a demand by the very SSNP beneficiaries for similar scale-ups to take place every year, therefore encouraging the permanent allocation of resources and the integration of an FbA strategy within the local flood response plans.

A final choice between the three available options may ultimately have to be made based on the available design and programme set-up time. In fact, should none of the three options appear feasible for implementation during the upcoming Monsoon season, the SUFAL programme should consider the activation of a standalone FbA response. In such a scenario, existing government beneficiary lists, appropriately verified, could be included as part of the final caseload (**option 4**). This final option could generate a demand for more integration within government SSNPs in the years to come and in line with the phased approach proposed in table 7.

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Linking Forecast-based Action to Social Safety Net Programmes in Bangladesh

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