

REGISTRATION, TARGETING AND DEDUPLICATION:

Emergency Response inside Ukraine
Thematic paper



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List of Acronyms

AAP	Accountability to Affected Populations
CVA	Cash and Voucher Assistance
CWG	Cash Working Group (of Ukraine if not specified)
DMS	Data Management System
DSA	Data Sharing Agreements
GDPR	General Data Protection Regulation
HCT	Humanitarian Country Team
IASC	Inter-Agency Standing Committee
IDPs	Internally Displaced Persons

IM Information Management
INGO International Non-Government Organization
KI Key Informant
KII Key Informant Interview
M&E Monitoring and Evaluation
MEB Minimum Expenditure Basket
MoU Memorandum of Understanding
MPCA Multi-Purpose Cash Assistance
NGCAs Non-Government Controlled Areas
OIG Office of the Inspector General of the USA
PMT Proxy Means Tests
SoPs Standard operating procedures
TT Task Team
UNICEF United Nations Children's Fund
USAID United States Agency for International Development
WB World Bank

Introduction

Six months after the Russian invasion, Ukraine has rapidly become one of the world's largest humanitarian crises. As of 23rd of July 2022, 6.3 million people are internally displaced¹. Out of the 10.4 million people recorded to have crossed the border to other countries, approximately 4 million have returned to Ukraine². With functioning markets in most of the territory, the Humanitarian Country Team (HCT) prioritized Multipurpose Cash Assistance (MPCA) as the most appropriate humanitarian assistance for the Ukraine crisis. According to the Ukraine Cash Working Group (CWG), there are currently 28 cash actors with operational presence in Ukraine³ who report their activities to the CWG, and the cash sector is delivering 492 million USD to people in need⁴.

The CALP Network is the co-facilitator of a Learning Group (LG) working under the governance of the CWG. The overall objective of this group is to strengthen the ongoing cash response in Ukraine through the analysis of existing learning and documentation of lessons and good practises to inform other cash responses globally. This thematic paper will contribute to learning, documenting key lessons learnt, emerging critical issues, and real-time recommendations.

Methodology and limitations

The researchers have used participatory approaches to ensure that the perspectives and insights of all key stakeholders are taken into consideration. Primary data collection was conducted mainly through key informant interviews (KIIs) with CVA actors. The CWG co-leads provided the list of key contacts, complemented by CALP. 33 key informants (KIs) were interviewed, and the first draft of the research paper was reviewed by a number of cash practitioners members of the Learning Group and the various Task Teams. Two workshops were organised with the LG:

- Prioritisation exercise and selection of the three priority thematic learning areas⁵, which will appear as research papers.
- Discussion some of the key findings from the KIIs

Secondary research was conducted via a review of key publications relevant to the selected theme, from various contexts.

The researchers conducted all the data collection remotely, through video conferences and online workshops. Due to the scope of work, the researchers did not directly interview cash recipients to ascertain perceptions of CWG members' programmes. Equally, the depth of the analysis has been contingent on the KIs' availability and the information shared. The secondary data review was limited to studies in the public domain, documents shared by CALP, and the researchers' own experience, especially since the majority of KIs could not identify other crises where relevant good practises have emerged, nor

¹ IOM's IDP estimation <https://data.humdata.org/dataset/ukraine-idp-estimates>

² Border crossings from and into Ukraine , as of 2nd of August 2022: <https://data.unhcr.org/en/situations/ukraine>

³ As the CWG co-leads reported, as of July 2022, there are 26 international and two national cash implementers. These are cash actors that report their activities to the CWG.

⁴ CWG reported figures as of 4th August 2022: <https://www.humanitarianresponse.info/en/operations/ukraine/cash-working-group>

⁵ The Learning Group voted Linking Humanitarian Cash to Social Protection as a first priority; Enabling local responders, as a second; and Registration, Targeting and Deduplication as third priority. Other themes included Coordination of cash assistance, MEB and transfer values, Protection and inclusion, and AAP.

share relevant unpublished work. For example, there aren't any published lessons learnt⁶ or evaluations around the deduplication system currently used in Ukraine, although it has been tested in other contexts, and is currently used at scale in Jordan and Bangladesh. Limited research has been published on the Ukraine crisis escalation to date.

Registration

The Ukraine response has offered numerous opportunities for digital innovation, including for registration purposes, due to the existing financial and digital infrastructure. However, there are growing concerns that some of the most vulnerable are being left out due to their low digital literacy. For example, in rural areas, 58.8% of adults have low to no digital skills. The most common profile of those with no digital skills are people above 60 who reside outside of the regional centers. 46.7% of above 60 have no digital skills and 38.2% have low digital skills⁷.

Findings

The main positive findings are presented below:

- The Ukraine crisis has offered a unique opportunity to digitalize emergency cash programming, with widespread use of self-registration via online platforms⁸ and government-led registration⁹. This offered agencies the opportunity to respond¹⁰ at scale in a record timeframe, reaching up to 2.64 million¹¹ new people in four months. **This scale-up could not have been achieved if agencies had used traditional in-person registration methods with enumerators.** In fact, a global report on state-led COVID-19 cash schemes shows that the identification of recipients mostly relied on open registration, social registries, and tax databases, and among registration mechanisms, online platforms were the most widely utilized¹⁸. In Colombia, self-registration for the “*caminantes*” population, an extremely mobile segment of the migrant population, was piloted¹⁶ and scaled-up, with relevant learning around digital literacy, attrition rates, and communication with the affected population amongst other things¹².
- Self-registration platforms offer the possibility to reach participants in non-governmental controlled areas (NGCAs) and conflict zones, moving away from a response limited by physical access and safety, although internet connection and mobile networks also suffer from interruptions.

⁶ A summary report will be published based on the Ukraine experience in mid-September 2022.

⁷ Available at: https://osvita.diiia.gov.ua/uploads/0/588-the_first_in_the_history_of_ukraine_research_compressed.pdf

⁸ There are several self-registration platforms in Ukraine, including e-dopomoga (launched in May 2022) <https://edopomoga.gov.ua/en.html> – a government-run platform; Estonian Refugee Council and Unity for the Future platform <https://register.pagulasabi.ee>, UNICEF platform <https://register.unicef.org/>, WFP self-enrolment form <https://ukr.reg.scope.wfp.org/ukr/code>, and NRC WhatsApp based registration.

⁹ One reviewer has flagged that the main source of recipient data at the onset of the crisis was the government-led IDP registration, which was a large-scale in-person exercise done by local Social Department offices. Participants were given a QR code for self-registration, with additional support being offered to those with low digital literacy.

¹⁰ While humanitarian agencies report 2.64 million assisted people, two reviewers argue that only the registration was very fast, and the actual payment was delayed for up to six weeks in some cases. The consultants could not verify this information, due to the lack of PDM reports made available.

¹¹ <https://www.humanitarianresponse.info/en/operations/ukraine/cash-working-group>.

¹² The project has used new technologies, including geotagged Facebook adds, WhatsApp chatbot for two-way communication, Signpost, automatic deduplication, and online registration forms.

- While some agencies are relying mostly on country-wide self-registration online platforms, others are using more traditional in-person registration, or a mixed approach.
- Operating with government referral lists (government-led IDP registration¹³ and e-dopomoga¹⁴) has been referred to as a success by KIs, initially allowing for a rapid scale-up of operations for agencies that did not have a presence in the country before the conflict escalation.

Discussion

Furthermore, KIs have also expressed growing concerns with the following issues:

- Several KIs expressed **concerns that the online self-registration platforms might exclude the most vulnerable from cash assistance**. According to a 2019 government study, approximately 53%¹⁵ of the Ukrainian population had very low to no digital competence, especially among older people and the rural population¹⁶.
- There is an **over-registration of participants** and a lack of necessary funding to assist everyone under a status-based approach (also known as a blanket targeting approach for all those displaced), raising issues around accountability. There are concerns that not all participants that have been registered and qualify for it have so far received cash assistance. Several KIs flagged that some agencies are struggling to respond to the extremely high demand for support through their online registration platforms, and to deliver assistance due to limited capacity and funding. This raises questions around **accountability to affected populations** and the need to develop a more effective communication strategy with all those who have registered and might expect assistance and those who have not been deemed eligible.
- There is a **higher risk of registration duplications**¹⁷ among agencies running country-wide self-registration systems in parallel¹⁸ as opposed to effective geographical coordination. The over-reliance on online platforms could hinder effective geographical coordination and impacts coverage, especially if in-person registration is needed to target the most vulnerable.
- Several KIs raised concerns with the **over-reliance of some agencies on government lists of newly registered IDPs**¹⁹ that have a high degree of exclusion. There is still a very high possibility that some people refuse to register their details with the government, due to fear of

¹³ Refer to footnote # 10.

¹⁴ <https://edopomoga.gov.ua/en.html>

¹⁵ In 2019, the Ukraine government carried out the first-ever study of digital literacy among Ukrainians aged 17-70: 37.9% have very low competence, while 15.1% have no digital skills at all. Available at: https://osvita.diiia.gov.ua/uploads/0/585-cifrova_gramotnist_naselenna_ukraini_2019_compressed.pdf

¹⁶ Older Ukrainians are falling behind in digital skills, available at: <https://www.undp.org/ukraine/blog/bridging-digital-divide-ukraine-human-centric-approach>

¹⁷ There are two types of duplications: of registrations and assistance/payments. The findings are referring to duplication at the registration phase.

¹⁸ Two KIs said that the current registration duplication rates are approximately 20% and growing. Three KIs from organizations currently using the deduplication system did not report rates of registration duplicates during the interview.

¹⁹ In the forthcoming paper on Linking Humanitarian Cash and Social Protection we are arguing that referral lists from the government of newly displaced is not a form of linking with SP, as new IDPs are not integrated in the state's IDP program.

conscripted and the general 2014 stigmatization of IDPs. KIs have argued that IDPs were discriminated against when accessing employment and credit and struggled with considerable barriers. Minorities are also said to be structurally excluded from government programs.

- Together with a status-based blanket targeting approach, **self-registration is not conducive to the inclusion of local organizations as implementing partners**, nor offers them entry points into the cash response at the registration phase. KIs have argued that the current model, which primarily relies on self-registration or government lists and is used by some of the largest cash actors is cutting out local implementing partners from their response that is focusing on the digitally savvy. The model does not harness the competitive advantages of local actors, which often relies on having a more people-centered approach.
- Several KIs argued that the Ukraine response is unique due to the scale and depth of digitalization of the cash response. However, the COVID-19 pandemic has accelerated a global shift towards digitalization of large-scale cash programming²⁰, and there are several country examples²¹.

Recommendations for the Ukraine response

- **Agencies should adopt a user-centered and smoother registration approach.** Self-registration platforms sometimes use different targeting criteria (even with a status-based approach), **meaning that people must register multiple times with different agencies to qualify for assistance.** Multiple organizations providing assistance does not have to mean multiple registrations, if interoperability and referrals are done right. As the CWG and cash actors move towards a vulnerability-based targeting modality, registration systems will include household level socio-economic data and household surveys will become lengthier and more detailed, making the registration process extremely cumbersome. Implementing the recommended centralized self-registration platform below would facilitate this next step²².
- **Humanitarian organizations currently using online self-registration platforms, or are planning to do so, should develop a common self-registration platform²³ and centralized referral system.** They should also agree on a data governance that allows for a caseload division between all cash actors²⁴ and minimize duplicative overhead costs. The current self-registration architecture is centered on the cash delivery agencies, not on those they serve, and there are too

²⁰ <https://blogs.worldbank.org/developmenttalk/ten-lessons-largest-scale-cash-transfers-history>

²¹ For example, cash actors in Colombia adapted their operations from in person to remote modalities, targeting approximately two million new participants in several months. Colombia is a good comparison due to the similar scale of cash operations and level of digitalization. With the digitalization of cash programs, cash actors experienced an increase in fiduciary risks, and exploitation and abuse of participants along the use of remote registration and use of e-transfers. Equally, an amplification of exclusion risks of the most vulnerable either due to lack of digital literacy, access to phones and internet, and KYC (know your customer) requirements was reported.

²² As per one reviewer, the design and expectations of these systems should meet or exceed those already deployed by the Ministry of Social Protection. If the humanitarian community cannot match that, it should reconsider why it's trying to replicate existing systems with much poor design / service maintenance.

²³ The e-dopomoga government run platform could be an option. However as some KIs flagged, there are also those unwilling to register with the government as IDPs. Also, for neutrality purposes, the humanitarian actors should develop/maintain a separate registration capacity if they are to target the NGCAs or conflict zones.

²⁴ As one reviewer pointed out, this would basically mean the transformation of NGOs/UN business model and more predictable donor funding.

many self-registration platforms operating in parallel. This important step could coincide with the launch of a new harmonized targeting model.

- **Cash implementers should refocus on coordination and find an inter-agency referral solution²⁵** for the distribution of surplus caseloads referred by the government, or through self-registration platforms. This approach requires significant coordination backed-up by MoUs, Data Sharing Agreements (DSA) between agencies and with the government authorities as well as data sharing legislation such as GDPR rules and regulations, and referral implementation standard operating procedures (SoPs). This process could be built along the existing deduplication system. Like Ukraine, cash actors in Colombia signed MoUs with the government and local authorities, and used government lists of registered migrants and refugees during the pandemic alongside their own registration. One organization, assigned by the relevant Colombia area based CWG, usually received the lists deduplicated, and then the caseload split among agencies.
- **Agencies should consider diversifying the way they register potential participants, to ensure that no one is left behind.** Online self-registration could still be a valid registration method alongside government referral lists, if combined with more traditional ways of reaching the most vulnerable and less those digital savvy. Online self-registration and in-person registration should be used in parallel, in a complementary and efficient manner.
- As more organizations see the benefit of, plan to introduce, hybrid registration models (self-registration combined with in-person registration), with few exceptions, **international cash actors should start involving local actors to conduct in-person registration and verification, monitoring, etc., activities that usually require a people-centered approach.** The implementation model will have to be reconciled with the localization agenda in the Ukraine response, if agencies are moving away from fully digital to a hybrid model that also targets those with a low digital literacy, and those in hard-to-reach areas.
- **Resources traditionally dedicated to in-person registration should be used to strengthen two-way communication mechanisms** geared towards those with high and low digital literacy, complaints and feedback mechanisms, and fraud prevention. Learning from the COVID-19 pandemic on the digitalization of the cash programs highlight that the deployment of new technologies should accompany a joint comprehensive communication campaign²⁶, easily accessible and effective grievance mechanisms, and investments in digital infrastructure²⁷.
- **Global good practices²⁸ on data sharing and data privacy should be systematically adopted at the inter-agency level.**

²⁵ A successful example comes from Colombia during the COVID-19 pandemic, where the area-based CWGs assigned one lead agency to receive and deduplicate the governmental referral lists, before sharing and dividing the caseload with all interested actors, including the UN, INGOs, and local organizations.

²⁶ One reviewer has flagged that there has been no communication strategy in place, and messaging has often been contradictory and inaccurate. Another reviewer has flagged that there is no added value in having a sophisticated registration system if people do not receive information about the selection criteria and requirements until they register.

²⁷ <https://www.poverty-action.org/sites/default/files/publications/Updated-The-Digitization-of-Emergency-Cash-Assistance-During-COVID-19-in-Colombia.pdf>

²⁸ There are already several global guidances on the topic specific to humanitarian cash:

CALP: <https://www.calpnetwork.org/resources/collections/data-responsibility-toolkit-and-case-studies/>

IFRC: <https://www.ifrc.org/document/practical-guidance-data-protection-cash-and-voucher-assistance>

HDX: <https://centre.humdata.org/guidance-note-data-responsibility-in-cash-and-voucher-assistance/>

Key learning for other responses

- **Digital tools are an effective and cost-efficient way of reaching scale in a timely manner, in contexts where people have a certain degree of digital literacy, and the digital ecosystem is well developed.** Humanitarians need to find better ways to communicate, using diversified technologies that focus on real-time collection of data, including online registration and social media tools. Agencies need to develop a comprehensive two-way communication strategy also geared towards those with high digital literacy.
- **The exclusive use of digital methods means that agencies are missing the opportunity to reach the most vulnerable – and in the ways that people affected by crisis prefer.** As in Colombia and Lebanon²⁹, the Ukraine response shows that limited opportunities for face-to-face interaction can contribute to people affected by crises feeling disempowered and dissatisfied. **Online self-registration and in-person registration should be used in parallel, in a complementary and efficient manner.**
- The use of digital solutions for the self-registration and deduplication³⁰ of participants should not replace an effective real-time and geographical coordination between agencies. With the proliferation of several self-registration platforms, **the current model used in Ukraine shows systemic sectoral issues around competition between agencies for caseload, data ownership, data sharing, and overall mistrust when it comes to data.** These issues need a global approach, as they are now surfacing in all crises around the world³¹.
- **Cash operations focused on large scale self-registration has led to the neglect of local actors and their inclusion in the project cycle as partners, cutting them out of the response³².**

Targeting

Five months on, the status-based or blanket targeting for IDPs³³ approach is no longer justifiable. It is now time to accelerate the transition towards a harmonized vulnerability-based approach.

Lastly, the (soon to be published) Donor Cash Forum principles on interoperability provide a valuable framework which can be the basis for standard-setting on these issues in Ukraine and in other responses.

²⁹ https://www.calpnetwork.org/wp-content/uploads/2020/06/1571834650.AAP-Report_24092019_Print.pdf

³⁰ Based on internal data, some respondents that are using the deduplication system stated that the current rates of duplication of registrations have reached approximately 20% - and are growing.

³¹ Reviewers point out the lack of interoperability of standard systems deployed in emergencies, even if there is a commitment to “deliver as one” and that systems often need tweaking, piloting and adaptation to live cases, to the detriment of participants.

³² This point will be further elaborated in the forthcoming thematic paper on localization of cash response.

³³ Status-based is used interchangeably with blanket targeting for IDPs.

Findings

- The majority of KIs argued that **blanket targeting of IDPs was appropriate at the start of the response, given the context**. Considering the significant scale of the displacement and needs, its main objective was to reach as many people as possible.
- While some agencies initially attempted to use a targeted approach for the selection of participants, the method slowed the response considerably. The general approach at the CWG has been a status-based approach.
- Although most KIs refer to this approach as a “no regrets” approach, one KI has flagged that this has been misinterpreted as a blanket targeting approach, while “no regrets” referred to the scale-up of humanitarian architecture as per IASC³⁴ guidance.
- Although the international humanitarian community had pre-existing cash operations in Eastern Ukraine, as several KIs mentioned, the scale was small and there is a perception that no relevant socio-economic data was readily available³⁵ that could be used to inform the development of the targeting criteria³⁶.

Discussion

- Most of the KIs mentioned limited funding as a constraining factor and the catalyst for change towards a more targeted approach. **They also argued that blanket targeting for IDPs is an unsustainable financial model and highlighted that donors are now advocating for a more targeted approach.**
- **Vulnerability remains poorly defined and understood** – some KIs argued that the blanket approach to displacement in the West of Ukraine was not justified with needs assessments. Also, some flagged that the assumption that all those who either fled the country or were internally displaced were equally socio-economically vulnerable and in need of cash assistance was not evidence-based³⁷. **For example, while the blanket approach targeted IDPs in accessible areas in the Western parts of the country, some KIs recognized that the most vulnerable and in need were in fact those in non-accessible areas, such as non-governmental controlled areas (NGCAs) or areas with active conflict.** Some raised concern over the disproportionate support given to IDPs in accessible areas (and in some instances of higher-value³⁸) versus those who stayed in NGCAs or conflict zones. The latter were not assisted mainly due to access constraints, safety, and

³⁴ IASC describes the “no regrets approach” within their Humanitarian System-Wide Scale-Up Activation: Definition and Procedures SOPs as the immediate allocation of the Central Emergency Response Fund by the ERC within 72 hours of the crisis, and the deployment of the Inter-Agency Rapid Response Mechanism to support in-country capacity, and fulfill key leadership and coordination needs. This approach can be used both in a technical IASC guidance sense and also for targeting at high speed. In Ukraine’s case, KIs refer to the foregoing of certain verification steps and acceptance of a certain degree of inclusion error, in order to roll out assistance faster.

³⁵ One KI mentioned that the World Bank has socio-economic data, however it is unclear if it is updated and whether this could be shared with the humanitarian community or whether the WB could also play an important role in the conversation around the humanitarian to social protection linkages.

³⁶ One reviewer commented that socio-economic statistics were already available from various sources, but that agencies applied a one-size-fits-all approach instead of understanding the context and the socio-economic profiling of the population.

³⁷ A 2021 USAID report on financial literacy, inclusion and wellbeing states that: “Ukraine is in the Top 10 countries in terms of adequacy of savings to cover current expenses for at least three months in case of loss of the main source of income”. Available at: http://www.fst-ua.info/wp-content/uploads/2021/10/Ukraine_2021_Financial-Literacy-Survey-Report_eng.pdf.

³⁸ One reviewer flagged that the value per person of in-kind assistance delivered by their organization in conflict areas is almost half when compared to the value of cash transfers delivered to IDPs in accessible areas. This discrepancy in value is of high concern.

human resource issues. A future targeted approach based on socio-economic vulnerability should move away from this imbalance and prioritize funds for the most vulnerable³⁹.

- Most organizations cited the significant scale of the displacement⁴⁰ at the onset of the crisis as the main argument for blanket targeting, and acknowledged the higher risk of inclusion during the emergency response. However, some KIs argued that the **blanket approach for IDPs was not evidence-based** and was a consequence of organizations managing to fundraise a considerable amount of money that had to be disbursed quickly, under significant pressure from senior leadership⁴¹.
- In the Ukraine response, **status-based targeting is not harmonized, and agencies apply it differently**. Some, for example, add criteria during the selection process (such as having children) or cap family sizes at three or five members. The latter also influences the transfer value⁴², generating discriminatory practices. Some KIs have raised concerns with the high competition over the number of recipients registered that exists in the Ukraine crisis, with “flag planting” actions and little accountability for actual implementation.
- KIs flagged a conundrum – while everyone agrees that actors should move towards a targeted model, **there is insufficient updated socio-economic data to create one**. As other experiences show (see the below case study on Iraq), it is feasible to graduate from a status based to a hybrid (status based and vulnerability based and/or area based approaches), and then a Proxy Means Test⁴³ (PMT) targeting method, while focusing on collecting the key indicators along the way. However, this approach requires commitment to a lengthy process.
- Some KIs argue that while a blanket approach for IDPs is no longer sustainable in accessible areas, a fully targeted approach is still operationally difficult to implement in hard to access areas. A **hybrid modality should be explored in such situations**, following a similar approach as described in the case study below.

Recommendations for the Ukraine response

- **CWG members should fully harmonize the current status-based criteria and align total cash transfer values/family size, especially if planning to use status-based in NGCAs.**
- The CWG and its members should design a **people-centered targeting model**⁴⁴ that is adaptable and based on data collected from different parts of the country, ideally to reflect the situation of NGCAs and contact areas.
- **While agencies continue with status-based targeting modality for the short term, they should agree on and start collecting a set of key socio-economic, categorical and**

³⁹ One reviewer has argued that many agencies did not reflect on the do-no-harm principle in their programming in areas of active conflict where the government is trying to evacuate people, and are delivering in-kind assistance that incentivizes staying, exposing people to greater danger.

⁴⁰ Since 24 February 2022, nearly 12.8 million people are estimated to have been displaced in Ukraine, most of whom have not left the country. According to the most recent estimates, 7.7 million people are internally displaced as a result of the conflict, which is equivalent to 17.5% of the entire population.

⁴¹ One reviewer mentioned this was also a donor request.

⁴² Total value per HH is calculated as 75 USD/person/month * # of persons.

⁴³ The PMT method is employed when reliable and accessible data on socio-economic status (such as tax returns, pay slips or bank account balances) are unavailable or difficult to obtain, such is the case among conflict-affected populations. Using detailed survey data, proxy means testing relies on multivariate regression analysis to generate a formula for estimating household consumption using proxy indicators, such as housing type or negative coping strategies. Households whose predicted consumption falls below a certain defined threshold are determined likely to be vulnerable and are therefore eligible to receive MPCA. PMT models are used by Social Protection schemes and often represent an entry point to link humanitarian cash to Social Protection that also uses means tested schemes.

⁴⁴ One reviewer proposed the idea of “crowd sourcing” the targeting model by asking people online and in person who is most in need and why, in addition to aligning with social protection targeting approaches, which are both categorical and means tested. Local actors could add significant value to this exercise.

protection indicators that can be used to better define what “vulnerability” means in Ukraine, and how the current humanitarian crisis has impacted vulnerable groups. Data collection should align with or complement similar governmental efforts.

- Agencies should agree on a **common vulnerability assessment survey**⁴⁵, and **start collecting data on key indicators** that are the future basis for an evidence-based selection model. As part of the intermediary solution, **agencies should develop a score for recipients that reflect welfare levels** based on easy-to-observe characteristics such as the location and quality of the dwelling, ownership of durable goods and the demographic structure of the household.⁴⁶
- In the medium to long-term, PMT models could serve as entry points with government-led Social Protection schemes. In the case of Ukraine, the Global Minimum Income (GMI) social safety net also uses a PMT for the participant selection process; while other schemes use life-cycle vulnerability based on categorical approaches. **Any targeting model should consider potential points of convergence with government SP schemes**⁴⁷, which currently have both means testing and categorical approaches.
- The CWG and the Targeting Task Team targeting should explore the different targeting models, including how to **develop an evidence-based model building on examples from Lebanon, Jordan, Iraq, or Colombia, among others.**

Key learning for other responses

- Although initially used as an instrument for a rapid scale-up of the humanitarian cash operations, **status-based targeting should have a clear exit strategy within a limited timeframe.** This method is not evidence-based, nor financially sustainable.
- **Status-based targeting (in this case of IDPs) could generate unequal humanitarian aid delivery when actors primarily focus on accessible displaced population at the cost of those remaining – and by nature often more vulnerable - in hard to access areas.**
- Collecting key socio-economic and protection indicators that predict vulnerability are needed for the development of a vulnerability-based targeting method, and this often requires time and resources. Ideally this information should be collected during the initial phase of blanket registration, or when using a hybrid model.
- A common targeting approach at the CWG level enables fairness to access cash programs for those in need across all geographical areas. **There is a need for a commitment from cash actors to agree and adopt the harmonized targeting criteria,** as some already flagged that large organizations might “go their own way” if the process does not move fast enough. As other crises show, such practices often result in an unfair delivery system (where participants are selected differently), going against the universality principle of humanitarian aid. Experience from other crises shows that a coordinated approach is possible, although it takes time (see the example below on Iraq).
- **Adopting the same targeting method together with the same transfer value and frequency are prerequisites for the fairness of the deduplication process** - as a hypothetical example, recipients receiving one-off assistance based on their status should not be excluded from receiving additional monthly transfers if their vulnerability scores are high.

⁴⁵ This process could take several months, based on other experiences.

⁴⁶ <https://www.unhcr.org/eg/wp-content/uploads/sites/36/2021/01/Multipurpose-Cash-Assistance-2019.pdf>

⁴⁷ The GoU has a well- established and matured social protection mechanism, including various categorical schemes and a PMT scheme, namely the GMI. However, it does not specifically target conflict-affected people except for a dedicated IDP program, established in 2014. Cash actors collecting new data could inform understanding of how people have been affected by the conflict and vulnerability redefined.

Example: The evolution of cash coordination and targeting modalities in Iraq, from 2014 to 2021

In Iraq, during the large-scale, repeated displacements between 2014 and 2018 following the conflict with the so-called Islamic State, MPCA was distributed in one-off installments to all those who were newly displaced. Agencies used a status-based blanket targeting approach. This model later evolved into a vulnerability-based approach, as the assumption that all those newly displaced were vulnerable from a socio-economic point of view and required humanitarian cash assistance, had changed. The transition from a blanket approach towards a PMT targeting model was also possible due to the large amount of harmonized data that was collected during the first response, including key socio-economic indicators. The blanket model evolved into a two-tiered approach: i) the provision of one-off transfers to all newly displaced; and ii) the provision of three additional MPCA monthly transfers to the most vulnerable among the displaced. As large-scale new displacements ended in 2018, agencies started using a PMT methodology for the selection of all recipients. The model was later revised in 2019¹ and 2021¹. This was an acknowledged common effort of Iraq's CWG involving all major cash actors in the process.

Deduplication

The deduplication⁴⁸ system has been a success story of the Ukraine emergency response that should be replicated in other future crises.

Findings

- According to one KI managing the data system, most humanitarian cash programs reporting to the CWG are using the selected data management system for deduplication, Building Blocks⁴⁹. Most cash actors in Ukraine have identified deduplication of registrations as a common objective for a centralized data system⁵⁰. The CWG chose this system from among three other proposed systems through a selection process.
- **The majority of KIs believed that the humanitarian CVA community in Ukraine made significant collective steps and progress on de-duplication in comparison to other responses.**

⁴⁸ Duplication is not a concept equally understood by all cash actors. For example, duplication of assistance is categorized as improper payments by the Office of the Inspector General (OIG) of the USA. In some contexts, the OIG has requested USAID implementing partners to submit reports of duplicated assistance directly to the OIG;

https://oig.usaid.gov/sites/default/files/2021-04/9-000-21-005-P_0.pdf

⁴⁹ <https://innovation.wfp.org/project/building-blocks>

⁵⁰ Deduplication of registrations is different than duplication of assistance. While the deduplication of registration can prevent people from registering multiple times and reduces the risk of over-assistance between organizations, it does not fully eliminate the risk of over-assisting beneficiaries that can still occur at the payment phase. We recommend that each organization undergoes a thorough review of payment lists to check for potential errors or duplicates before payments are processed, process that happens outside of the Building Blocks technology.

- Even if, for some KIs, it should have happened faster, **the speed of the system⁵¹ roll-out has been very efficient** compared to other crises where it took several years to agree on a sector-wide deduplication system.
- The chosen system has been tested and improved in other crises. The blockchain-based technology can provide an efficient and timely solution to a process that involves data sharing of non-identifiable personal information, encryption, and flagging of duplicates.

Discussion

- During the initial couple of months of conflict escalation in Ukraine, there were extensive discussions around the adoption of a “single” data management system. Some key informants suggested that some agencies tried to impose their organizational system and some also argued that there was too much emphasis on deduplication to the detriment of having other important operational technical discussions.
- **As one KI pointed out, agencies are most likely inclined to use their own internal and tested information management systems for registration and monitoring and evaluation (M&E) functions.** There is an overall aversion towards new system adoption especially during the onset of a new emergency response and there is also significant reluctance to engage with UN systems from INGOs that need to follow GDPR rules.⁵²
- Although the improvements are significant, there is still a long way to people centered data management, with agencies trying to gain traction for their own data system’s sectoral adoption. Acknowledging the findings and applying the recommendations of this paper is a first step towards this change.
- Some KIs also argued that while it's important to get everybody onboard, the choice of the system did not appear to be transparent to many agencies and was not properly documented. KIs stated that the lack of documentation and insufficient details around the selection process put off some agencies that did not participate in the initial conversations. As a result, these agencies are not using it.
- Although the adopted technology offers real time solutions for deduplication, some KIs also flagged that **the blockchain technology is not fully understood by all agencies**, which also explains why not all CWG members intend to use it.
- While the chosen system flags duplicate registrations, some KIs have argued that there is **no common definition of a “duplication”** – when participants are registered multiple times and before receiving a first transfer; or once they receive a first installment (as some KIs argued that cases continue to appear in the system even when they have not yet received a first transfer for months). Based on the interviews, the decision tree behind the data algorithm was not entirely clear. In addition, there is a disconnect between how humanitarians deduplicate only heads of households (HH), and the reality on the ground - where all HH members have their own tax ID (HHs do not have single IDs). This can enable people from the same family to register multiple times with different agencies.
- The pre-requisites for a fair deduplication process lie in the harmonization of the cash programs (same transfer value, same definition of HH size, same frequency and duration) and program cycle (time from registration and deduplication to the actual transfer of cash). Different targeting modalities and divergence in terms of the frequency of transfers, selection criteria and amounts would result in an **inherently unequal and discriminatory system**.
- Preliminary discussions around deduplication platforms in the response have also included the government run, UNDP-developed DIIA data management system (DMS), which is hosted by the Ministry of Digital Transformation. Said to fulfill a similar, if not the same deduplication function, the

⁵² As one reviewer pointed out, the structural issue revolves around the lack of interoperability and needs a global solution.

DIIA system was planned to be launched in July 2022, five months into the crisis. **KIs have flagged that there is still a lack of clarity as to whether the two systems should be interoperable or simply run in parallel, including whether DIIA will offer the opportunity to deduplicate with the government run social protection schemes**⁵³. KIs have stated a number of challenges with the interoperability model: a lack of clarity around data privacy and data ownership; issues around recipient consent around data sharing with the government of Ukraine; preserving the humanitarian space and finding a niche for humanitarian organizations outside of government-led initiatives, which will not reach people in non-government controlled areas and conflict zones, among others. On the other hand, having two similar systems running in parallel means a duplication of efforts and increases the risk of duplication of recipients. Future conversations around the role of humanitarian organizations, links to social protection and extent of social protection coverage will most likely shape the use of DIIA and/or the current deduplication DMS.

Recommendations for the Ukraine response⁵⁴

- The conversation should move away from what KIs have flagged to be a competition between the best agency systems to be adopted widely in the sector, towards the **acceptance of a plurality of systems that currently form the cash IM architecture**. The focus should be on points of convergence between data systems, which is often the case for deduplication. **Agencies can still use their own data management systems and still be able to deduplicate**. Generally, the plurality of IM systems that can still deduplicate does not support the need for a single registration system for all cash operations.
- Agencies should agree on a **common definition and purpose of duplication and map out agencies' processes and timeframes from registration to payment**. It would be desirable to deduplicate before transferring the first payment, however, the reality is that harmonizing the time from registration to payment between so many agencies will be extremely difficult due to the many processes involved. An alternative is to maintain the deduplication process at the registration phase, and upload lists right after registration (first agency that registers, “keeps” the recipient). Of course, this will need to be reconciled with the plans to centralize the self-registration platforms and automatic deduplication before lists of recipients are shared between agencies.
- Task Team 3 (TT3) on Deduplication should develop a deduplication and adjudication SoP that maps the decision-making process behind the deduplication system, including: key programmatic decisions around harmonization of cash programmes that are to be deduplicated and those that are not (for ex. one-offs); map processes and timeframes of participating agencies from registration to payments; develop the decision-making tree during the deduplication process; add a case management component and troubleshooting (for example to accommodate beneficiaries that want their data removed from the system, etc.), and map any data sharing involved in the process.
- **TT3 and CWG members should consider deduplicating only cash programmes that have the same frequency, duration, and transfer value**. Deduplicating programs that offer shorter-term transfers with those offering longer-term transfers creates an unequitable delivery system.
- **TT3 and CWG members should consider deduplicating all adult individuals instead of heads of households**, using the individual tax ID as the taxonomy of reference across all parties. This will prevent the “hidden” duplication of assistance, when multiple family members register as heads of households and receive assistance from multiple organizations.

⁵³ One KI has flagged that the Ukrainian government has very stringent laws when it comes to data protection.

⁵⁴ The humanitarian community could use the principles of the Donor Cash Forum interoperability statement as a basis, in particular: “Put people at the centre; Protection rights and respect privacy; Collaborate and cooperate; Governance; Design for inclusivity; Build on what already exists.” https://reliefweb.int/attachments/0da56795-52fc-49dd-af9d-3a949a48a59b/common_donors_messaging_cash_ukraine_final06272022_external.pdf

- Considering the high turnover of staff at the onset of an Level 3 (L3) crisis, the CWG and task teams should **document important decision-making processes**, develop specific guidelines as needed, and store all documents in a common location.
- Agencies should agree and commit to a **common timeframe for uploading the data into the system for deduplication** (x days before the transfer), to avoid situations where participants appear in the system but have not yet received the transfers. Equally, all the required M&E processes, including verification, should be done prior to loading the data in the system.
- Generally, data protection and data sharing issues are the main obstacles for the adoption of a particular deduplication mechanism. When considering shifting to other deduplication systems, agencies should prioritize **pre-encrypted systems that do not require data sharing agreements** ⁵⁵.
- To ensure neutrality and decentralized ownership, one single agency should not host blockchain-based systems. Instead, other cash actors should join the system through the creation of the so-called blockchain nodes. This will require additional capacity building and resources.
- **Add a case management component to the deduplication process to prevent people from falling through the cracks.** For example, if a recipient has been identified as registered in the system, but claims he/she did not receive assistance, establish a protocol for additional data sharing between agencies that allows for case management troubleshooting. Since recipient lists are uploaded before transfers are actually made, there might be a disconnect between the reported and actual received assistance. The addition of case management will most probably require significant additional time and human resources invested in the process, which could be a good evolution of the data systems as the crisis evolves from a blanket for IDPs to a more targeted approach.
- Develop global tools and guidance that could guide decision making around deduplication system adoption for CVA, at the onset of a new emergency response.

Key learning for other responses

- **Agencies or coordination mechanisms should not impose their own proprietary IM registration and recipient data management systems to the other organizations during the first phase of an emergency response.** Organizations will use their own preferred internal IM systems, as adopting a new system within an emergency consumes important resources that should be dedicated to better registration, targeting and deduplication.
- **For deduplication to work at scale, employ a common ready-to-use technology**⁵⁶ **that has already been tested elsewhere.**
- While technological solutions for system interoperability are easier to develop and implement, there is still a long way to solve some of the **key concerns when it comes to legal and governance issues around data sharing between agencies, systems interoperability, data storage and ownership, data protection and cyber security.**

⁵⁵ Encrypted systems refer to systems where identifiable personal data is not shared with other organizations nor uploaded to the system itself and therefore do not require DSA between organizations to deduplicate

⁵⁶ Such as WFP's Building Blocks, Dimagi's CommCare, Genius Tags' blockchain deduplication technology, among others.

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