



Towards More Common Cash? An approach paper for the Uganda Cash Working Group

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¹ [CashCap](#) is a specialised project within NORCAP, the Norwegian Refugee Council’s global provider of expertise to the humanitarian, development and peacebuilding sectors. It consists of personnel who provide cash and market expertise and support which is inter-agency and independent of agency-specific agendas, to ensure this is trusted as neutral by all parties involved. Any requests for CashCap support must have at least four sponsoring humanitarian and/or development agencies. In Uganda, CashCap support was requested by DanChurchAid, Danish Refugee Council, UNHCR and WFP; it has been provided since 2018 via coordination and technical functions, deployed within the refugee response via secondments of personnel hosted by UNHCR and WFP.

Recommendations at a glance

The greatest scope for significant gains in collaborative cash-based assistance is via **complementary operational models**: specifically a common cash system led by UNHCR and WFP and including other partners to the refugee response, and a locally optimised collaboration model led by the Uganda CCD Network; this in addition to models, such as regional (cash) consortiums, already in place and working well.

Complementary models, and a modular approach

- ⇒ Develop **more than one common cash operational model**, specifically oriented to the preferences and needs of the people it is intended to protect and assist, and its participating agencies;
- ⇒ Adopt a **modular approach**, across the programme cycle, where specific and targeted collaboration, harmonising and/or integration is conducted on identified **core components**;
- ⇒ Pay specific attention to building **complementarity between operational models** as they develop.

Core components:

- **Joint cash feasibility assessment/considerations**
- **Standardised and harmonised transfer values**, developed via reference to updated and relevant Minimum Expenditure Basket (MEB) data, whether for refugee settlements or urban response
- **Improved beneficiary registries and investment in interoperability** to enable equitable, timely, safe and data protection-compliant access to the information agencies need in order to communicate with, identify, target, verify, assist, case manage, and/or monitor persons of concern; for refugees using proGres v4; for other populations of concern evaluated case by case
- **Common cash delivery/transfer mechanisms**:
 - Investing in **digital delivery options** wherever possible: **agent banking** and **mobile money**
 - Diversifying to **more than one delivery option**; and providing **choice for recipients in how they receive their cash**
 - Exploring **common agreements with FSPs** and **harmonised fee structures** for all partners
- **Joint monitoring and analysis initiatives** in support of common cash, specifically data collection and analysis coordinated via the Market Analysis task force, and ideally a transition to an inter-agency Joint Market Monitoring (and Analysis) Initiative for the Uganda response later in 2020
- **Stronger linkages between social protection and humanitarian CVA**

There is a clear role and added value for **locally optimised INGO collaboration led by the Uganda CCD Network**, including: strategic, technical and operational support from a Collaboration Manager; exploring formation of CCD technical sub-groups to best represent CCD member agency priorities both within and beyond the refugee response; and on data sharing and interoperability to improve beneficiary registries.

Meaningful progress in further developing this common cash operational model workstream requires **dedicated interagency resourcing** beyond what currently exists in each individual agency. First priorities are to locate sustainable interagency coordination and technical support functions within Cash Working Group co-lead agencies (UNHCR and WFP), and via a more permanent Uganda CCD Collaboration Manager.

Coordination and technical exchange needs to be further strengthened between the Cash Working Group and relevant working groups for the Livelihoods and Resilience, Education in Emergencies and Protection sectors; sub-groups for Urban Refugees and People with Specific Needs; and on social protection via focal points including with the Ministry of Gender, Labour and Social Development, and at UNICEF and WFP.

Cash Working Group partners should continue to explore opportunities to benefit from **strategic partnerships with relevant providers of expertise and demonstrated added value** – including the REACH initiative in Uganda for its existing track record on interagency data collection and analysis products in support of evidence-based decision making; and the GSMA's mobile for humanitarian and development workstreams in context of scaling mobile money and strengthening the digital literacy of cash recipients.

Payment systems and financial service providers have been exhaustively mapped in Uganda; efforts should now turn to further **optimising cash delivery**, and investing in the complementary areas partners prioritise.

Overview

Based on evolving global policy and practice in terms of cash-based response², informed by strategic and operational priorities established by the national [Cash Working Group](#)³ – including its co-leads UNHCR and WFP, and INGOs via the local [Collaborative Cash Delivery \(CCD\) Network](#), and in line with donor recommendations, there has been developing interest in exploring adopting more common approaches for cash and voucher assistance (CVA) in Uganda.

Since February 2020 efforts have been ongoing, via the Cash Working Group and facilitated via requested technical support from CashCap, to: (i) review existing common cash-related analysis and models for response in Uganda; (ii) seek to further facilitate identification of opportunities, preferences and priorities; and (iii) propose how these may be framed in support of the development of more common, collaborative and integrated interagency cash-based assistance – within [the refugee response](#) as a priority, but to the extent possible with wider relevance and utility for agencies implementing cash-based programming.

This paper summarises the state of play in light of the above; it also provides [recommendations](#) for next steps which may be taken, whether via the Cash Working Group or sub-sets of its members.

It is important to note that even the terminology used in seeking to articulate a common cash-related initiative varies, and can be differently understood depending both on linguistics, and existing perspectives and experience. For example, the terms ‘system’, ‘platform’ and ‘facility’ – as used in various global and country-specific contexts⁴ – are at times used or understood interchangeably, but may better be seen as referring to discrete (if potentially overlapping) components of a wider operational model ‘systemic whole’. Meanwhile ‘interoperability’ – typically referring to data⁵, but also with reference to the system, platform and/or database that may hold that data – is a core concept, and in principle very likely a key objective, but is also a term that can generate different understandings or assumptions.

Recognising that policy, practice and learning on optimal [operational models](#) for jointly delivering cash and voucher-based programming continue to evolve, it is recommended to make reference to the ongoing learning agenda and evidence base coordinated by CaLP, including the working definition and categorising of operational models that have been developed:

“The overall structure through which agencies work jointly...to deliver cash and voucher programming...in situation response and analysis, programme design and implementation.”

CaLP’s working definition of an operational model⁶

² See for example: [Statement from the Principals of OCHA, UNHCR, WFP and UNICEF on Cash Assistance, December 2018](#); [Common Donor Approach for humanitarian cash programming, February 2019](#); [Joint Donor Statement on Humanitarian Cash Transfers, March 2019](#); [ECHO Guidance to partners delivering large-scale cash transfers, 2017](#); [EU Cash Compendium 2019](#)

³ As set out in its 2019 [Terms of Reference](#), the Uganda Cash Working Group (CWG) was established in December 2016 to support the humanitarian community in Uganda in assisting affected refugee populations, within the [Refugee Response Coordination Structure](#) jointly led by the Office of the Prime Minister (OPM) and UNHCR. The CWG membership includes both technical functions that focus on process (e.g. sharing lessons learned, harmonising approaches to delivering cash, developing guidelines) and strategic functions focused on results and impact (e.g. avoiding gaps and duplications, advocacy). At the time of writing, CWG membership had broadened to include agencies using cash outside the refugee response – e.g. for disaster-affected and urban populations, and social protection – plus donors, government, and private sector partners.

⁴ Cf. UN Common Cash [System](#); [Collaborative Cash Delivery \(CCD\) Network](#) and (ResponseBuilder) [Platform](#); Common Cash [Facility](#) in [Jordan](#): “a [platform](#) used by UN agencies and NGOs”; [Greece Cash Alliance](#): “a harmonised partnership [system](#) for cash assistance”; [LOUISE](#): Lebanon’s One Unified Inter-Organisational System for E-cards – amongst others a “[system](#)”, “[platform](#)” and “common card”; British Virgin Islands (BVI) [Joint Cash Platform](#); plus various cash consortiums e.g. Cash Consortium for Iraq (CCI); Somali Cash Consortium

⁵ One definition for interoperability [as provided by the EU](#) is as follows:

“Interoperability is the ability of information systems to exchange data and enable sharing of information...Interoperability does not mean pooling all data or collecting additional categories of information. It does not entail data registered in one system being automatically shared across all other systems. Interoperability is about a targeted and intelligent way of using existing data to best effect while at the same time ensuring full respect of fundamental rights, in particular data protection requirements.”

⁶ www.calpnetwork.org/themes/operational-models/

Categories of operational models adopted for humanitarian cash and voucher assistance⁷

- **Consortiums and alliances:** formed on the contractual and funding relationships between members, usually with funding channelled through a lead agency and disbursed to other members as sub-grantees (examples: Cash Consortium of Iraq, Cash Consortium of Ukraine, ECHO-funded Cash Alliance or Consortium e.g. for South-West Uganda).
- **Shared cash delivery mechanisms:** entail collaboration in the financial delivery of cash transfers but not necessarily in other areas of programming, although linking to shared registration systems may feature. There are broadly two types of shared cash delivery mechanisms: (i) one where a single contract exists between one agency and the financial service provider (FSP), but other agencies may use the platform (examples: WFP One Card in Lebanon); or (ii) one in which each participating agency has a contract and relationship with the FSP (example: Jordan Common Cash Facility).
- **Broad integration of systems:** models with highly harmonised and collaborative systems for CVA delivery and project cycle management, which build on the comparative advantage of each stakeholder (examples: LOUISE in Lebanon; Greece Cash Alliance; British Virgin Islands Joint Cash Platform).
- **Single-agency delivery** separates cash and voucher programmes into two components: (i) all the humanitarian programming elements of the intervention (assessment, monitoring, targeting, etc.) and (ii) the financial delivery of cash transfers – a model elaborated in ECHO’s guidance on large-scale cash transfers developed in 2017⁸.
- **Collaborative modular approach**, e.g. the Collaborative Cash Delivery (CCD) Network (and ResponseBuilder Platform) which groups different activities and competencies in the CVA project cycle. Taking a modular approach allows the CCD to provide a more nuanced, localised approach, depending on the context and active agencies.
- To the above is to be added the **UN Common Cash System** [announced by the Principals of OCHA, UNHCR, WFP and UNICEF](#) in December 2018 (after the development of this framework).

It is worth noting that the Operational Models Analytical Framework guidance underlines that decision making on the choice between these various operational models is often – rightly or wrongly – highly influenced by context, the policies and approaches of donor agencies, and the commonly held assumption that highly collaborative operational models result in greater efficiency and effectiveness.⁹

Regardless of the specifics of its component parts, it is recommended that any more common approach to cash-based programming in Uganda must be informed by certain **core principles**: i.e. to be [collaborative](#); [inclusive](#); [available to multiple partners](#); [context-specific](#); [demand- not supply-driven](#); and [to the extent possible based on the identification of shared business needs across agencies using CVA](#). Of note are that certain common threads – across a range and diversity of opinions – as expressed by implementing agency stakeholders in Uganda in the course of this analysis chime with some key takeaways from a global event on operational models held during the CaLP-convened 2019 Cash Week event¹⁰, including:

- the requirement to shift from coordination to meaningful collaboration;

⁷ Sources: [CTP Operational Models Analytical Framework](#), CaLP, 2018

[The State of the World’s Cash Report: Cash Transfer Programming in Humanitarian Aid](#), CaLP, 2018

⁸ “The Guidance...will favour streamlined contracting arrangements, based on a single delivery system for cash, where feasible and/or desirable, according to the specific context, which will in turn foster strengthened accountability and visibility...Central elements of the Guidance are common targeting criteria; a single registry or at least interoperable registries of eligible beneficiaries; a single payment mechanism delivering standardised transfer values through a single financial service provider, allowing top-ups by other agencies; a common feedback/grievance system; and a common results framework. Other elements...are the separation of the delivery of cash transfers from the other elements of the project cycle; and independent Monitoring, Evaluation, Accountability and Learning (MEAL).”

[‘Guidance to partners funded by the Directorate-General for European Civil Protection and Humanitarian Aid Operations \(ECHO\) to deliver large-scale cash transfers’](#), November 2017

⁹ [CTP Operational Models Analytical Framework](#), CaLP, 2018

¹⁰ ‘Operational Models: What do we want to see’ event, 3 December 2019. Source: [Cash Week 2019 Event Report](#), CaLP

- for collaborative approaches – that improve service delivery to beneficiaries and demonstrate efficiency and effectiveness – to include exploring policies and frameworks for joint procurement of financial providers, and for appropriate and safe interoperability of systems and data exchange;
- that what works will always be context-specific, and to beware of drawing global conclusions;
- and, perhaps most of all, that there will always be trade-offs; there is no single perfect standalone operational model that will suit all agencies, cover everything or be *the* most efficient, effective, equitable and sustainable – and so complementarity between more than one model will remain essential.

Common cash operational models in Uganda

At the time of writing, common cash operational models that already existed or were under development in Uganda included consortiums and alliances – typically at regional or local levels (e.g. the ECHO-funded South-West Cash Consortium led by the Danish Refugee Council); single agency delivery (e.g. WFP’s General Food Assistance delivered as cash in refugee settlements¹¹); an adapted version of a UN Common Cash System being developed specifically by UNHCR and WFP; and an iterative collaborative modular approach via the Uganda CCD Network.

Alongside existing consortiums using cash, the greatest scope for potentially significant gains in quality, efficiency, effectiveness, equity and sustainability – if these are agreed to be the relevant key criteria against which to measure or benchmark – are via the two latter channels, i.e. a common cash system led by UNHCR and WFP, and a locally optimised modular collaboration model led by the Uganda CCD Network.

While these two models may need to continue to evolve discretely and in parallel in Uganda, there is nevertheless in reality a high level of commonality, synergy and overlap between what has already been identified and prioritised between the two, and which could be leveraged going forwards; they are by no means mutually exclusive. This is borne out by a review of the existing key sources and relevant components which such common cash operational models would usefully build upon, intersect with and be informed by, i.e. the following:

WFP-UNHCR Joint Approach on Financial Inclusion and Cash-Based Interventions for Refugees in Uganda

Within a joint approach document signed in May 2019¹², UNHCR and WFP set out a series of objectives – pertaining to stronger synergies between their own operations, but also with the clear intention to provide inclusive benefits to other agencies working within the Uganda refugee response – including:

- Minimum standards and parameters for a common [cash] system, implemented through close collaboration with selected financial service providers (FSPs);
- For WFP and UNHCR to jointly procure financial services, based on a jointly agreed set of criteria for financial inclusion¹³; and cooperate to harmonise fee structures with FSPs;
- Based on the principle of inclusiveness, to invite other UN and NGO partners to join and leverage this common system for the implementation of their own programmes using cash transfers;
- To ask FSPs to avail the same fee structure to other UN and NGO partners wishing to engage in cash-based interventions for refugees through the common system;
- To seek to provide refugee households with access to one bank account (regardless which combination of agency or bank is delivering cash assistance), with:

¹¹ In nine out of the thirteen refugee settlements, and to c. 40% of refugees, as of March 2020

¹² ‘Financial Inclusion and Cash Based Interventions for Refugees in Uganda, WFP–UNHCR Joint Approach’, Kampala, May 2019

¹³ “Financial inclusion means that a full suite of financial services is provided, with quality, to all who can use them, by a range of providers, to financially capable clients” – [as defined by CaLP](#), citing the [Centre for Financial Inclusion](#) “Financial inclusion means that individuals and businesses have access to useful and affordable financial products and services that meet their needs – transactions, payments, savings, credit and insurance – delivered in a responsible and sustainable way.” – [as defined by the World Bank](#)

- bank account access dependent on the identity of the bank account holder being biometrically verified by the Biometric Identity Management System (BIMS) and record entered or updated in the Government of Uganda refugee registration database (proGres) administered with the support of UNHCR;
 - one bank account per household providing, at minimum, access to: savings; receipt of transfers from other accounts or mobile money providers; possibility to make transfers to other accounts or mobile money providers; and withdrawal of cash;
 - integration with mobile money: all bank accounts enabled to link to mobile money wallets, so that refugees can benefit from the services associated to a bank account through mobile money systems;
- To work with partners in the Cash Working Group to build on this system to establish a wider 'Common Cash Delivery Facility' in Uganda, capturing technical expertise, lessons learned and programmatic objectives of the wider humanitarian and development community;
 - To invest simultaneously in financial literacy training in all refugee hosting areas, to include literacy in the use of basic banking services, and other financial services which may support livelihood initiatives (e.g. access to credit / financing);
 - For cash-based assistance to be harmonised and channelled, wherever appropriate, through this common cash delivery system; and for cash transfer values – in particular unrestricted cash grants in support of meeting basic needs – to be informed by the Minimum Expenditure Basket (MEB) and its ongoing operationalisation, and associated harmonisation;
 - To collaborate in setting up a common system for regular market price monitoring, to provide an evidence base on the availability of essential goods and services and purchasing power provided to persons of concern in the form of cash, and to monitor if cash programmes affect market price levels;
 - To coordinate financial inclusion and multi-sectoral cash assistance programming through the Uganda Cash Working Group, within the framework of the overall refugee response coordination structure in Uganda, and specifically via a joint technical team to guide and coordinate an action plan for this joint approach;
 - Key milestones to include development of a joint response analysis defining readiness and feasibility for use of cash through this common system in different refugee locations; establishment of delivery arrangements; and joint procurement of service provision.

Uganda Collaborative Cash Delivery (CCD) Network areas of focus

The CCD has been established in Uganda since 2018, and currently comprises 14 members.¹⁴ The original Memorandum of Understanding between CCD member agencies¹⁵ established a purpose and set of commitments including to:

- Enhance collaboration and harmonisation of approaches to cash-based programming
- Specifically to:
 - Conduct basic needs assessments and response analysis either jointly or based on the same templates and procedures;
 - Develop joint standard operating procedures (including targeting criteria and size of cash grants for different purposes and harmonising conditionalities);
 - Develop joint tools and templates for project implementation, including basic monitoring tools (post-distribution monitoring) and a common database to enable data collection that can be accumulated and analysed across a cash-based response;

¹⁴ ACTED; Action Against Hunger (AAH); CARE; Catholic Relief Services (CRS); Danish Church Aid (DCA); Danish Refugee Council (DRC); International Rescue Committee (IRC); Lutheran World Federation (LWF); Mercy Corps (MC); Norwegian Refugee Council (NRC); Oxfam; Relief International (although no longer present in country); Save the Children; World Vision International

¹⁵ 'Memorandum of Understanding Between Collaborative Cash Delivery (CCD) Platform Members Addressing Country Level Cooperation in Uganda', drafted in April 2018; revised in early 2019

- Carry out joint advocacy towards service providers to provide competitive rates, as well as exploring joint cash payment systems and delivery mechanisms where feasible;
- Where practical and feasible, develop joint feedback/complaints mechanisms on on-going responses, and contribute to developing lessons learned and best practices to enhance the collaborative work of members;
- Shared lobbying and advocacy strategies for a better CVA environment and regulations e.g. close engagement with the Cash Working Group, the Office of the Prime Minister (OPM) and implementing partners to push for 'do no harm' in CVA, targeting criteria, standards and procedures.

A renewed impetus to and updating of the Uganda CCD's priorities and areas of focus was developed via the short-term deployment of an interim CCD Collaboration Manager in late 2019. In addition to the aforementioned core purpose and commitments of the MoU, areas of potential relevance to developing an enhanced common cash operational model from CCD member agencies' perspectives as identified across the CCD's three core dimensions¹⁶ were as follows:¹⁷

- **Strategic**
 - Define a Governance Framework to set the rules, ways of working and enable collaboration through clear decision-making;
 - Seek opportunities to include local partners to support the diversity and capacity building of the humanitarian ecosystem;
 - Scope out need for collaboration, duplications/gaps and priorities to set-up a workplan/road-map.
- **Technical** – cash delivery, and data sharing:
 - Exploring setting up a joint cash delivery platform / work towards setting up a joint and cost-efficient cash delivery platform that would be open to all CCD members;
 - Financial Service Provider (FSP) mapping; study feasibility of joint FSP contracting / signing joint FSP framework agreements; finalisation of joint FSP contracting;
 - Study to identify challenges regarding data-sharing and identify solutions;
 - Managing data collaboratively: adopting common data sharing standards, signing a data-sharing agreement;
 - Starting implementation of an identified data-sharing solution.
- **Operational**
 - Collaboration to support joint implementation as sitting at the core of the CCD ⇒ specifically via a common platform through an identified data-sharing solution;
 - Joint implementation of pilots; joint submission of proposals; strategic collaboration between consortiums (e.g. the ECHO-funded Cash and Education Consortiums);
 - Developing innovative initiatives – e.g. DCA's digitising of cash delivery using e-cards or vouchers; Mercy Corps and Save the Children piloting cryptocurrency, distributed ledger technology and blockchain.

Joint donor recommendations

As made following a UK DFID, EU-ECHO and USAID joint donor mission to Nyakabande, Nakivale, Rwamwanja and Kyaka II settlements in February 2020¹⁸, namely that:

¹⁶ namely Strategic; Technical; and Operational

¹⁷ Sources:

- 'Interim CCD Collaboration manager, short term deployment report', Gabriella D'Elia (Cash Humanitarian Support Personnel, Global Humanitarian Team, Oxfam) November to December 2019

- 'CCD Presentation to the Uganda Cash Working Group', 18th December 2019

- 'CCD Uganda: Tentative 12-month workplan', January 2020

- 'CCD Uganda: (draft) Concept Note for a Collaboration Manager', January 2020

¹⁸ 'Joint Donor Mission to Nyakabande, Nakivale, Rwamwanja and Kyaka II by UK DFID, EU-ECHO and USAID, February 2020: Main Observations, Recommendations and Next Steps Related to Cash Based Transfers'

- Partners delivering cash should consider how to ensure maximum flexibility and choice for cash recipients, while ensuring mitigation of diversion risks and improved cost-efficiency. **The overall objective should be to set-up a single cash assistance delivery platform that includes several financial service providers.** The use of only one financial service provider per settlement should be avoided in order to mitigate risks.
- WFP and partners should take advantage of any upcoming tenders to include maximum flexibility within cash programming, as well as to get the most out of service providers and avoid monopolies, and other stakeholders ... should support this.

Adapting programming in response to COVID-19

In the context, since mid-March 2020, of requirements to undertake COVID-19-related contingency planning and mitigation measures, including programme criticality reviews and adaptations to programming that would likely be optimal and safer, a key component has concerned cash-based assistance – specifically:

- (i) the ongoing feasibility of existing cash-based assistance, whether multisectoral or sector-specific – in particular from the perspectives of market functionality, accessibility, and stability of prices;
- (ii) evaluating possibilities to scale cash-based assistance where technically and contextually feasible and appropriate;
- (iii) specifically exploring opportunities to invest in scaling up provision of cash-based assistance by digital transfers or means of delivery¹⁹, with a focus on agent banking and mobile money delivery channels.

From the perspective of pre-existing (i.e. pre-COVID) areas identified to look to develop in terms of common cash operational model(s), the decision by some agencies to scale digital cash delivery (according both to existing strategic plans, and as new emergency-oriented responses) has provided (i) renewed impetus and potentially significant opportunities around investing in collaboration, along with (ii) a rapidly evolving evidence base of use for the wider response. Of note with reference to the refugee response:

- UNHCR and WFP have moved to fast-track and operationalise the Joint Approach they had previously conceptualised (as referenced above), in the first instance via a concept of operations²⁰ for joint cash delivery to urban refugees in response to COVID-19; the two agencies mobilising to provide basic assistance to urban refugees residing in Kampala via provision of unrestricted cash transfers delivered using mobile money, based on premises which include:
 - A joint approach and road map on cash assistance to urban refugees and asylum seekers, coordinated by a dedicated taskforce comprising UNHCR, OPM and WFP;
 - Provision of multi-sectoral, unrestricted cash assistance via a shared delivery mechanism, with both agencies contracting the same Mobile Network Operator (MNO);
 - UNHCR providing multi-purpose cash transfers to cover basic needs including non-food items (NFIs) and shelter (rent); WFP providing unrestricted cash transfers to support food and nutrition requirements;
 - That the operationalising of a joint cash delivery response in Kampala also represents a test case which can be used to generate learning, and leveraged by adapted application more widely across the refugee response going forwards.
- With regard to the provision of assistance to refugees living in settlements, from April 2020 WFP decided to implement a large-scale increase in its use of cash for General Food Assistance (GFA),

¹⁹ ‘Digital transfers’, ‘digital payments’ and ‘e-transfers’ are interchangeable terms:

“A digital transfer of money or e-vouchers from the implementing agency to a recipient. [These] transfers provide access to cash, goods and/or services through mobile devices, electronic vouchers, or cards (e.g., prepaid, ATM, smart, credit or debit cards). E-transfers may also be referred to as digital payments; these are umbrella terms for e-cash and e-vouchers.”

[CaLP Glossary, 2019](#)

²⁰ ‘Concept of Operations for Joint Cash Delivery to Urban Refugees in Response to COVID-19’, UNHCR and WFP, draft, May 2020

starting with shifting all recipients in South-West settlements to cash in May and June²¹; where possible delivery via scaling up agent banking²², with refugees enrolled by Equity Bank, opening bank accounts and receiving debit cards.²³

Developing a more common approach to cash within the refugee response

A Common Cash task force was formed in late March 2020, as a sub-group working on behalf of and reporting to the Uganda Cash Working Group. Under an initial overarching objective to ‘reduce risk of COVID-19 contamination in refugee hosting districts, while maintaining operational continuity for provision of life-sustaining and life-saving humanitarian assistance’²⁴, the group is tasked to:

- Collaborate on and coordinate feasibility and operational dimensions of potential scaling of cash;
- Enable agencies to (i) feed into, and (ii) benefit from a more common cash system within the refugee response.

At the time of writing, task force membership comprised DRC (on behalf of the CCD²⁵ and ECHO-funded Cash Consortium); UNHCR; WFP; with facilitation and coordination support provided by CashCap. The group is open to other agencies while maintaining an optimal means of collaboration via a relatively smaller membership; it is not a channel for resource mobilisation or strategic positioning, nor designed to duplicate existing coordination or collaboration structures in this regard.

Via a series of working meetings, the following workstreams had been identified, presented to the Cash Working Group, and were under development with opportunities to collaborate by interested agencies:

Cash feasibility – incl. via market analysis	Common Cash approach paper for CWG
Cash transfer services: settlement level mapping	UN joint procurement of cash transfer services
Digital and financial literacy in support of digital cash	UNHCR-WFP multisectoral urban refugee COVID-19 response
Capacity to scale up of existing FSPs	Community-based protection using mobile
Working with agents on needed liquidity	Leveraging proGres v4
Mobile Money: information gathering + analysis	Risk assessment, analysis, mitigation
Engagement with MNOs	Advocacy points/key messages
GSMA support: webinar on Uganda key learning + orientation to using the MISTT	Leveraging best practice and existing learning in setting up a common cash system

As collaboratively defined via the common cash task force, the following **analytical assumptions** were identified and are recommended as underpinning the approach to developing a more common system for cash-based assistance within the refugee response:

- An adapted scenario of unknown duration exists under COVID-19, with programme criticality analysis having led to a reduction in programming across the board, and a priority focus on the essential e.g. predominantly life-sustaining and life-saving humanitarian assistance.
- The first priority remains to do no harm, i.e. reducing risk of COVID-19 transmission in areas of implementation and providing assistance as safely as possible, both for recipients and their communities, and for frontline agency staff.

²¹ With the exception of new arrivals, some asylum seekers and certain protection cases, who will continue to receive food in kind

²² Nakivale, Oruchinga, Kyaka II

²³ Cf. WFP Operational Update, Uganda Inter-Agency Meeting, 15 May 2020

²⁴ As adopted by WFP for its General Food Assistance – cf. ‘Concept of Operations for General Food Assistance to Refugees in Response to COVID-19, WFP Uganda Country Office’, April 2020

²⁵ As the Uganda CCD’s Memorandum of Understanding states, one of the roles and responsibilities assigned to the lead agency is to “act as key liaison with the national Cash Working Group as representative of the joint work and decisions of the CCD”; in the course of 2020, in line with its new Governance Framework the CCD will transition from a single lead agency structure to a model comprising a five member-steering committee supported and chaired by a neutral Collaboration Manager. This will amongst others enable clearer and more equitable CCD representation within coordination and operational working groups.

- Scaling up provision of cash-based assistance by digital means of delivery – where technically and contextually feasible and appropriate, including where markets allow – may represent a much safer and more optimal option for providing assistance than ‘business as usual’ according to the pre-existing system and set-up.
- The intention to scale up digital cash – and in particular mobile money – also likely represents a major opportunity in line with existing strategic objectives for many agencies operating in Uganda, whether from a cash delivery and/or a financial inclusion and wider livelihoods perspective.
- Any scaling of cash assistance remains contingent on required market functionality, accessibility, availability, stability of prices, and liquidity – in particular within local agent networks.
 - This has been urgently prioritised in terms of the need for ongoing, regular and increased monitoring, assessment and analysis of markets.
 - There is nevertheless an inherent functionality and responsiveness intrinsic to markets and the humans within them, even in times of crisis; markets are very rarely entirely non-functional; and where this may temporarily be the case, they will respond or return – including when ‘incentivised’ by demand generated by injections of cash/liquidity.
- Programme modality decisions related to shifting to, away from or back to cash assistance need to remain flexible, and informed by analysis and evidence.
- From a markets perspective, one key step in this regard was the establishing of a Market Analysis task force, also a sub-group working on behalf of and reporting to the Uganda Cash Working Group, which is co-led by REACH and WFP.²⁶ The Market Analysis task force has coordinated developing of a Markets and COVID-19: functionality and price monitoring tool²⁷, twice-monthly snapshot factsheet²⁸, and Tableau dashboard to understand the impact of COVID-19 on commodity prices and functionality of markets in refugee communities across Uganda and provide timely information to actors on a regular basis.
- For agencies utilising cash programming in refugee settlements, coordinating and/or bolting this on to the WFP system for cash-based General Food Assistance in that location is very often the reality on the ground; in such circumstances it follows that a more intentionally integrated and harmonised approach to cash delivery (e.g. more financially inclusive access to bank accounts via agent banking or mobile money) would be beneficial in terms of effectiveness and efficiency.
- Amongst the delivery options available²⁹, mobile money is perhaps the least developed, but with most potential for rapid and impactful expansion:
 - Existing refugee profiles/case records in the Government of Uganda and UNHCR’s proGres version 4 registration and case management system (‘proGres’) contain SIM card ownership and mobile telephone numbers, where these are held and have been registered by refugees;
 - Mobile Network Operator (MNO) presence can be extrapolated from mobile numbers (MNO prefixes are pending);
 - Existing data on MNO coverage per settlement can be both utilised and cross-referenced
 - Recent (March-April 2020) temporary reductions in fees offered by MNOs can be leveraged: different mobile money fees waived – on withdrawals; transfers between bank accounts; mobile wallets; transfers within the same MNO network;

²⁶ Other agency members of the Market Analysis task force are AVSI/Trickle Up; DRC on behalf of the CCD; UNHCR; with coordination support from CashCap.

²⁷ Data collection at the time of writing was led by WFP, using the remote [mVAM](#). The tool incorporates methodology from and temporarily replaces the existing inter-agency [MEB joint price monitoring](#); it is based on KII surveys with traders in marketplaces selling key commodities across the 13 refugee settlement locations. Data is collected on: prices of Minimum Expenditure Basket (MEB) food and non-food items; agent liquidity and payment methods accepted; and market functionality: numbers of vendors and customers; supply of key items/commodities; agent liquidity; wider market system function; volumes of cross-border trade; market rules and regulations; any restrictions on transportation of goods.

²⁸ See for example: [‘COVID-19 Market Monitoring: Refugee Settlement Price and Market Functionality Snapshot, 15-30 April 2020’](#), Uganda Cash Working Group – Market Analysis Task Force: REACH, WFP et al.

²⁹ Broadly, these are: agent banking with e-card; mobile money; cash in transit; pre-paid cards; e-vouchers with e-card; paper vouchers; cash in hand/direct; and direct bank account to bank account transfers.

- Existing inter-agency experience and learning on using mobile money for humanitarian and development cash-based assistance can be utilised;
- Providing mobile money may be inherently safer for recipients, and provide accessible financial inclusion opportunities.
- For assistance to refugees, there are significant opportunities to further leverage the Government of Uganda and UNHCR's platform of tools and applications for refugee registration and identity management³⁰, and specifically the proGres version 4 registration and case management system, supported by the Biometric Identity Management System (BIMS) and the Global Distribution Tool (GDT). These:
 - (i) represent the single registry of refugees in Uganda, and core point of reference for any partner providing assistance to these persons of concern;
 - (ii) can support key programme functions across the design and delivery cycle of cash-based assistance, including specifically for existing or any future scaling of digital cash;
 - (iii) in the case of proGres v4: enables UNHCR to grant access to partners³¹, ensuring a common platform for collaboration; is interoperable; and integrates with a system that allows end-to-end data transmission to financial service providers when cash assistance is used.³²
- As of April 2020, the proGres system contained records of 406,189 individuals having valid phone numbers, consisting of 153,992 households in settlements and an additional 40,980 urban population contacts. Of these, c.330,000 records were updated with latest information shared from the Uganda Communications Commission (UCC), which translated to 330,000 Know Your Customer (KYC)-confirmed phone numbers.
- In principle, access to proGres v4 for implementing partners via data sharing agreements can support the following:
 - Individual proGres records can each include selected assistance modality and mechanism, and information on either mobile number or bank account number.
 - All partners in the refugee response would then use these official accounts for cash transfers.
 - Partners that have already implemented activities including cash transfers via any modality or mechanism report back to UNHCR with the accounts that they have used.
 - This would generate 3 scenarios/actions:
 1. Reported account/number already in the database: proGres team confirms the account and it continues to be used for transfers;
 2. Reported account/number is different to what is in the database for that particular person of concern: proGres team determines/verifies which account will be used as official for all future transfers;
 3. Reported account/number is completely new and that person of concern did not have any information previously: proGres team updates the database with the new information and continues to use it as official for all future transfers.

³⁰ i.e. Population Registration and Identity Management Eco-System ([PRIMES](#))

³¹ UNHCR, the Office of the Prime Minister (OPM) and the National Identification and Registration Authority (NIRA) signed a Memorandum of Understanding on Registration and Data Management in Uganda in August 2019, amongst others to facilitate proceeding with deduplication of refugee biometrics against the national registry, and adopting proGres v4 as the registration system and main data repository. The MoU allows UNHCR to share personal data of persons of concern (PoCs) with partners for delivery of protection and assistance based on UNHCR's Data Protection Policy.

To access personal data of PoCs using proGres v4:

- i) Implementing Partners are required to sign Annex F to the Project Partnership Agreement (PPA);
- ii) Operational Partners are required to sign a Data Sharing Agreement with UNHCR, drawn up along the same lines as Annex F to the PPA, for the sharing and processing of personal data, including the use of proGres v4.

For more detailed guidance, refer to UNHCR's 'Note on Access of Personal Data in proGres v4 by Partners in Uganda' of December 2019; see also: [UNHCR Uganda Operational Update, August 2019](#)

³² UNHCR, Guidance on Registration and Identity Management: ProGres v4
www.unhcr.org/registration-guidance/chapter3/registration-tools/

- ⇒ In time this would generate a clean and updated set of records within proGres of one individual/household linked to one bank account and one mobile number, to the benefit of all partners across the refugee response.
- In terms of cash delivery options, as referred to above, UNHCR and WFP have decided to fast-track their existing plan for joint procurement of cash transfer services – in support of evolving a common system in line with their Joint Approach – and to consider both existing and new payment systems and providers.
 - Given the lead role that both these agencies play in terms of cash-based response from mandate, strategic and operational perspectives, their collective negotiating power, and their existing commitment to develop a delivery platform that is open and available to benefit other agencies, this represents a significant opportunity for Cash Working Group agency partners to engage with and feed into the ongoing process (in the first instance via the Common Cash task force), and in so doing be better placed to make informed decisions as to whether and how joining such a common facility could be beneficial and result in efficiency, effectiveness and programme quality gains.

Survey with Cash Working Group partners: main findings

At the outset of setting up this common cash-related analysis in February 2020, it was planned to run an iterative process consisting of:

- (i) mapping key stakeholders (i.e. relevant representatives of agencies who are members of the Uganda Cash Working Group and implement cash-based programming);
- (ii) conducting initial in-person interviews;
- (iii) running a survey to collect more detailed inputs;
- (iv) holding a validation workshop with all interested parties via the Uganda Cash Working Group, to present initial findings, finetune and adapt them, and discuss and develop recommendations;
- (v) summarise the above in a final report (i.e. this document).

Stakeholders were identified, and initial interviews conducted in-person in Kampala with nine agencies, and remotely with a further three, helping to frame the orientation of the analysis. The onset of COVID-19 then necessitated adaptations to the analysis process, due to constraints caused by lockdown and competing and more urgent priorities as agencies shifted into emergency response mode.

Nevertheless, in April-May a survey was conducted, and 18 agencies³³ provided detailed written inputs. In light of the UNHCR-WFP Joint Approach and the impetus to operationally concretise this and move forwards within the COVID-19 response, the core objective of the survey was to provide the opportunity for other agencies to collaboratively define whether and how (i) to feed into the design of, and then (ii) participate in and benefit from this more common cash system as it evolves. Where relevant (e.g. programmatic uses of CVA, on delivery) data for UNHCR and WFP is included for comparative purposes.

While it is beyond the scope of this paper to record in full the content and breadth of views, priorities and preferences expressed across agency respondents, and mindful of the inherently qualitative nature of the analysis, the following is a summary of the main findings that may be derived:

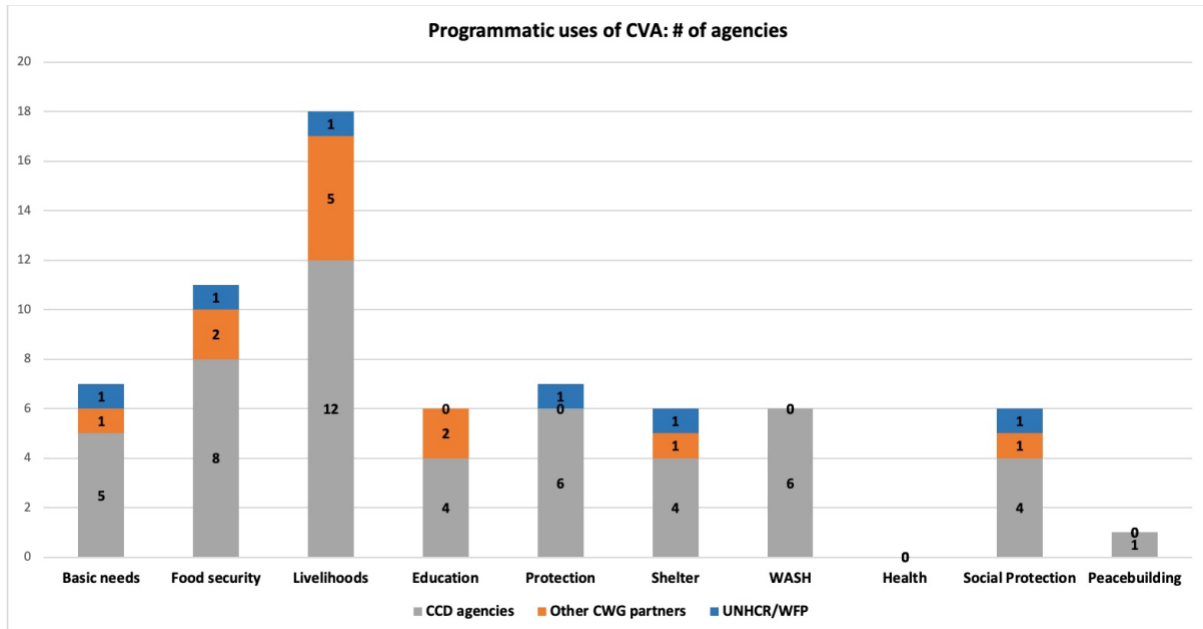
Cash-based assistance: target populations; programmatic areas; modality usage

- All but one – 17 agencies³⁴ – were using cash transfers to assist refugees, including all CCD agencies.

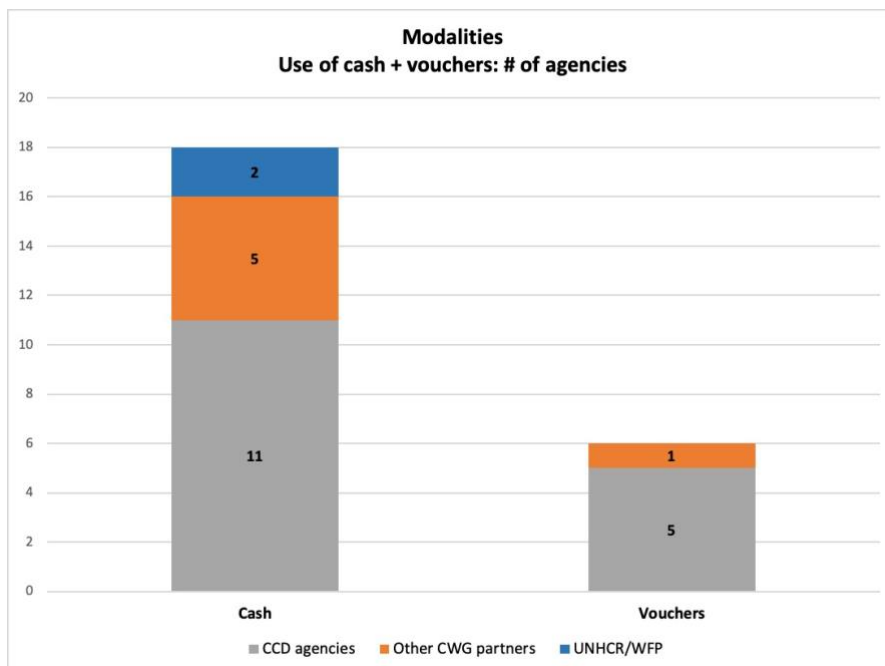
³³ The 18 agencies who participated (including all 13 CCD member agencies present in Uganda) were as follows: 100WEEKS; AAH; ACTED; AVSI Foundation; CARE; CRS; DCA; DRC; Finn Church Aid (FCA); GiveDirectly; IRC; LWF; MC; NRC; Oxfam; Save; Uganda Red Cross Society (URCS); World Vision

³⁴ This rises to 19 if including UNHCR and WFP; 100WEEKS provides livelihoods support to vulnerable Ugandan women, but does not currently work with refugees.

- 13 agencies reported using cash transfers to assist host communities, disaster-affected populations, or others, including 10 CCD agencies.
- In terms of programmatic outcome areas (sectoral or otherwise) where cash transfers are used, the breakdown per agency was as follows (NB this relates to **number** of agencies, but gives no indication of the volume of cash delivered):



- In terms of modality, a majority of agencies use cash; a third of respondents also use vouchers:



- A wide range of transfer values have been developed and used by agencies using cash-based programming. While this reflects the range of programmatic outcomes for which cash or vouchers have been used, the number of operational agencies, and the varying factors which dictate calculation of a transfer value, it also indicates an opportunity for targeted efforts to further

harmonise transfer values between agencies, from a national perspective via the Cash Working Group, and particularly where agencies operate in the same location or area.³⁵

- A majority of agencies were aware of the reference Minimum Expenditure Basket (MEB) developed in 2019, and had used this as a point of reference in their cash-based programme design and transfer value calculations.
 - The updated guidance on Minimum Expenditure Baskets – both for refugee settlements and urban response in Kampala – published in May 2020 is the point of reference for transfer value calculations going forwards.³⁶ A summary of transfer values based on responses to this survey has also been produced and made available for further harmonisation efforts via the Cash Working Group co-leads.

Cash delivery

Agent banking with e-card

1 CCD agency holds a contract with Equity Bank; a second is exploring using Equity via an MoU with WFP; UNHCR and WFP hold contracts with Equity Bank.

Mobile money

15 agencies use mobile money (of which 11 are CCD agencies)

Direct contracts:

- Airtel: 6 agencies (including 2 CCD, plus UNHCR and WFP)
- MTN: 3 agencies (including 2 CCD)

via Aggregators:

- 4 CCD agencies using the Beyonic platform
- 4 agencies (including 3 CCD) using Stanbic Bank;
- 1 CCD agency using True African to aggregate transfers to MTN, Airtel, and potentially Africell

E-vouchers with e-card

4 CCD agencies using RedRose platform (ONE Solution/ONEapp, or agency-customised) and e-cards – via existing organisational global framework agreements

1 CCD agency using CompuLynx COMPASS app and e-cards

Cash in transit

7 CCD agencies hold contracts with and use Post Bank; one using SGA Bullion
UNHCR and WFP hold contracts with and use Post Bank

Paper vouchers

4 CCD agencies using paper vouchers – all for food security and/or agricultural support

Cash in hand/direct

6 agencies using direct cash where no other option is available

Direct bank account to bank account transfers

6 CCD agencies making bank account to bank account transfers

Other delivery mechanisms

Koboko United SACCO; smart card (WaterCard) / Grundfos water stations in West Nile; cash deposited directly into a VSLA box

³⁵ e.g. reference to the latest MEB: income-expenditure, vulnerability and gaps analysis; availability (value and coverage) of other assistance; programme objective and specific sectoral expertise; additional requirements for households or individuals to be met over and above the MEB; targeting strategy and criteria; minimum national and/or local wage rates; etc.

³⁶ '[Minimum Expenditure Baskets for Cash-Based Programming in Uganda: Updated Guidance for Uganda Cash Working Group in 2020](#)', May 2020

Engaging in a common cash system and/or platform: perceptions and priorities

There is strong interest across agencies to join and/or benefit from a common cash operational model (e.g. delivery system and platform) in Uganda **in principle**³⁷, with a large degree of common interest in and articulation of the various potential benefits this could provide if correctly conceived and established.

However, there are also clear requests for:

- further clarity on – and space for collaborative engagement around – its core objectives and key components going forwards;
- acknowledgement of the limitations of any one system to meet the needs of or be able to fully incorporate the multiple UN, NGO and private sector actors involved in the implementation of cash-based programming;
- ensuring a correct process, according to which shared programmatic standards and governance structures (e.g. data sharing protocols) across actors are established and adopted before moving to interoperability of technology systems;
- concerns related to any perceived over-reliance on single technological solutions, single FSPs, single data management systems or single registries as a starting point or driving factor behind harmonisation;
- pragmatic identification of ‘quicker win’ priorities – for example optimising de-duplication of specific beneficiary records or lists; investing in targeted and impactful pilot initiatives to further test and develop specific common cash-related components – mindful of the time it takes to discuss, agree and establish the wider overarching architecture.

In terms of criteria to prioritise in the joint procurement for cash transfer financial services currently being explored by UNHCR and WFP – for example based on individual agency business needs, to ensure supporting specific programmatic or strategic objectives such as strengthening financial inclusion, to mitigate the effects of CoViD-19, or otherwise – common priorities across a range of responses were for:

- Payment systems/transfer mechanisms that strengthen financial inclusion;
- Avoiding monopolies and ensuring a diversity of cash transfer service providers/options;
- Ensuring the possibility to benefit from harmonised fee structures;
- Interoperability and compatibility with other existing agent systems;
- Integration of value-add services – particularly supporting financial literacy – for participants who open bank accounts with respective Financial Service Providers.

With reference to the Government of Uganda and UNHCR’s tools and applications for refugee registration and identity management, and specifically the proGres version 4 registration and case management system, the Biometric Identity Management System (BIMS) and the Global Distribution Tool (GDT), agencies were asked whether they saw access to and interoperability with these systems and tools as being relevant and adding potential value to their cash-based programming.

- For proGres v4, a majority of agencies³⁸ see this as relevant, for existing or future programming.
- Preferences and areas of potential benefit to programming that were identified included:
 - Equitable access to a single database of beneficiaries for all partners in the refugee response – while respecting necessary data protection standards and protocols) – in order to have a complete overview of assistance and services provided, including cash delivered; specifically to improve targeting, enable de-duplication, and reduce the need to assess where relevant data is already available
 - The centrality of proGres to the refugee response via its existing contents and uses: e.g. for initial registration – including supplementary data collected both from the [Vulnerability and Essential Needs Assessment](#) (VENA) and the UNHCR-led individual refugee profiling (formerly PSN verification) exercise; to support identification and targeting via basic biographical (including biometric) data for all registered refugees, along with categories relating to persons with specific needs (PSN) and extremely vulnerable

³⁷ 16 out of 18 agencies responded yes to this survey question

³⁸ 14 respondents, of which 10 CCD agencies

individual/household (EVI/H); for case management functions e.g. for protection (including child protection and gender-based violence); cash delivery decisions via data on bank account and/or SIM card ownership; and documentation, reporting and accountability on provision of assistance, both cash-based and in-kind.

- For the BIMS and GDT, this was relevant for 8 agencies responding (including 5 CCD).

Since late 2019, UNHCR has developed a specific framework³⁹ and associated requirements, modalities and user profiles for partner agencies in order to enable access to, sharing and processing of personal data of persons of concern in proGres v4.⁴⁰ According to this, an Implementing Partner (IP) jointly drafts and signs a dedicated Annex⁴¹ to their Project Partnership Agreement (PPA); meanwhile Operational Partners (OP) are required to sign a Data Sharing Agreement, which is drawn up along the same lines as the data sharing-related Annex to the PPA.⁴²

While the framework itself may be clear on paper, there remain strong needs for strengthening awareness across partners, and for supporting and resourcing further uptake of the opportunities it entails by enabling agencies to appropriately access proGres in a timely manner. Across those surveyed:

- Only three agencies (2 CCD) had signed an Implementing Partner Annex F on Processing and Protection of Personal Data of Persons of Concern; two agencies had an IP Annex F and one an OP Data Sharing Agreement in process but were experiencing delays in getting these agreements finalised; one agency had information management and consent concerns preventing it from using proGres for case management or any other functionality; for four agencies access to proGres had not been prioritised as it was not relevant for their current programming.

Amongst others, agencies recommended or requested:

- for access to the registration module to be provided as soon as possible to partners which have signed their data protection protocol or agreement;
- for a light user training to enable better understanding of the access, functionality and interoperability to of the system.

A majority 13 agencies (of which 11 CCD) saw value and would be interested in collaboratively developing an inter-agency joint data sharing agreement with UNHCR. Amongst others, this would provide the opportunity for agencies to jointly develop their own process, standards, governance and priorities with regards to data sharing and interoperability, and is a natural priority around which the CCD Network can coalesce and provide leadership.

In terms of specific priorities and relevant lessons learned to date, the following were highlighted:

- **Requirements:** needs for data sharing are clearly defined – and for some agencies further clarified; e.g. to validate and update a specific existing beneficiary dataset;
- **Functionality:** assessment, monitoring and evaluation data is centrally held and accessible to all agencies to facilitate faster programme design or response adaptation; existing challenges with multiple platform components, differing indicators and difficulties reconciling and de-duplicating beneficiary records are addressed
- **Data quality/accuracy:** timely two-way channels by which each partner has access to the system and the data they need when they need it; and is also enabled to contribute to the broader common concern of improving data accuracy for persons of concern in proGres by feeding back updated data in an appropriate manner on a regular basis;

³⁹ The framework for access is based on the MoU signed by UNHCR, OPM and NIRA; see footnote 31 above.

⁴⁰ See: 'Note on Access of Personal Data in proGres v4 by Partners in Uganda', UNHCR, December 2019

⁴¹ Annex F, which expands on and complements Article 12 in Appendix 2 of the PPA outlining the purpose of information sharing, data elements to be shared and processed, legitimate basis for collection and sharing of information, sharing of information with third parties, rights of data subjects, handling data breaches and modalities of data sharing, including the use of proGres v4.

⁴² Implementing Partners are funded by UNHCR; Operational Partners are institutions who do not receive funding from UNHCR but play a major role in refugee operations. Source: www.unhcr.org/uk/partnership-protection.html

- **Data protection standards:** further strengthening of safety, confidentiality, and need-to-know aspects for protection-sensitive cases e.g. Sexual and Gender-Based Violence (SGBV) survivors and Persons with Specific Needs (PSNs).

Digital and financial literacy

A majority of agencies (15 surveyed, of which 12 CCD) provide some form of specific support to strengthening digital and/or financial literacy⁴³ within their existing programming, and see this as a priority going forwards.

- Support components – including training curriculums used – varied; most were agency specific, and focused on financial literacy within livelihoods programming;
- There was some awareness of the WFP-UNCDF 5-week financial literacy training programme that was developed and then rolled out since 2019, with two agencies involved in the pilots, and a third currently using the training guidance and tools; this still represents limited use, and could be significantly expanded;
- Investing in basic digital literacy training to beneficiaries is a priority e.g. on mobile device basics required for receiving mobile money, managing mobile wallets, and safely and effectively using devices when engaging and transacting with mobile and/or bank agents.

Market monitoring and analysis

11 agencies (of which 9 CCD) were conducting regular market monitoring.

- ⇒ All agencies saw value in an inter-agency Joint Market Monitoring Initiative ([JMMI](#)) if one were to be established in Uganda; a number expressed interest in participating directly in such an initiative.

In terms of specific priorities in the context of COVID-19 to be prioritised by the Cash Working Group, the following were mentioned:

- Further analysis of market functionality across key marketplaces and systems, for both refugees and Ugandans;
- Strengthening price monitoring and market analysis – including a dedicated MEB for urban areas including Kampala, and for vulnerable non-refugee communities e.g. disaster-affected;
- Ensuring alignment between the Livelihoods and Resilience Sector and the Cash Working Groups, in particular in terms of the decision to deprioritise cash for livelihoods programming in favour of in-kind assistance modalities; and also around further harmonising calculations of daily rates used for Cash for Work.

⁴³ **Digital literacy:** For the [GSMA Digital Literacy team](#), this represents digital skills training programmes and raising awareness of the benefits of getting online: “Digital skills and awareness are essential enablers of mobile internet adoption. People need to understand the relevance and benefit to their lives from being online and to have the necessary skills to take advantage of the opportunity.”

Financial literacy: According to The World Bank, “the term can encompass concepts ranging from financial awareness and knowledge, including of financial products, institutions, and concepts; financial skills...and financial capability more generally, in terms of money management and financial planning. In practice, however, these notions frequently overlap.”

‘[Financial Literacy Around the World: An Overview of the Evidence with Practical Suggestions for the Way Forward](#)’, The World Bank, 2012

Recommendations

Complementary models, and a modular approach

Developing more common, collaborative and integrated interagency cash-based assistance is a shared strategic and operational priority in principle, due to the apparent and inherent benefits this provides when correctly framed and structured. However, while there may be agreement on the broad definition of this as a concept and the different iterations such operational models can take, there remains the inherent limitations, indeed impossibility, of any single model to optimally suit – or even be seen as of relevance to – all agencies, particularly given the diversity of cash-based programming undertaken in Uganda.

It follows that it may make most sense to:

- (i) Develop **more than one common cash operational model**, with the overarching objective of the model in question specifically oriented to the preferences and needs of the people it is intended to protect and assist, and the agencies who will participate as partners;
- (ii) Adopt a **modular approach**, across the programme cycle, where specific and targeted collaboration, harmonising and/or integration is conducted on identified **core components**;
- (iii) Pay specific attention to building **complementarity between operational models** as they develop.

Core components

In view of the Uganda operational context and in light of the above analysis, the following programme cycle core components and associated recommendations are identified, with a view to facilitating their further development as relevant by interested agencies:

- **Joint cash feasibility assessment/considerations** ⇒ in particular for ongoing COVID-19 response decisions regarding assistance modality selection, informed by joint market analysis
 - **Standardised and harmonised transfer values**, developed via reference to updated and relevant Minimum Expenditure Basket (MEB) data, whether for refugee settlements or urban response⁴⁴
 - **Improved beneficiary registries** to enable equitable, timely, safe and data protection-compliant access to the information agencies need in order to communicate with, identify, target, verify, assist, case manage, and/or monitor persons of concern; including:
 - appropriate and robust data sharing protocols or agreements, and interoperability between systems where required
 - two-way channels to enable de-duplication, and the updating or correcting of individual or household records
- ⇒ Within the refugee response, a single/common registry already exists in the form of proGres v4, uptake of which now needs to be better supported and more equitably leveraged; for partners working with vulnerable Ugandans – whether disaster-affected, in urban areas or via social protection/other forms of assistance – the questions of (i) if, and if yes then (ii) how to develop interoperability between registries need to be evaluated and addressed on a case by case basis.
- **Common cash delivery/transfer mechanisms:**
 - **Investing in digital delivery options** wherever possible, in particular **agent banking and mobile money**, for their financial inclusion benefits for participants;
 - for refugees, enabling partners delivering cash to utilise the bank account and/or SIM card and mobile number per individual or household registered in proGres in a harmonised manner;
 - **Diversifying to more than one delivery option** e.g. per settlement or area of implementation, to move towards the objective of **providing choice for recipients in how they receive their cash**, and to mitigate the risks associated with any form of monopoly;
 - **Exploring common agreements with FSPs** where feasible and appropriate; with framework agreements prioritised over project-specific arrangements; and future

⁴⁴ See the '[Minimum Expenditure Baskets for Cash-Based Programming in Uganda: Updated Guidance for Uganda Cash Working Group in 2020](#)', May 2020

- agreements – whether common facilities or bilateral/independent – able to benefit from harmonised and transparent fee structures available to partners;
 - For digital cash options, working closely with providers to ensure incorporating robust **capacity building, engagement and mitigation measures with agents.**
- **Community communication, engagement and accountability:** leveraging COVID-related requirements to collect data remotely by exploring developing more common approaches and systems for digitised communication and sensitisation, assessment, monitoring, feedback and complaints.
- **Joint monitoring:** continuing to develop joint monitoring initiatives in support of common cash, specifically:
 - **Data collection and analysis coordinated via the Market Analysis task force** – at the time of writing oriented to understanding evolving commodity prices and market functionality in the context of COVID-19 in refugee communities across Uganda in order to provide timely information to actors including on the feasibility of cash-based assistance⁴⁵;
 - Resourcing and enabling a **transition to an inter-agency Joint Market Monitoring Initiative** for the Uganda response later in 2020.
- **Developing linkages between social protection and humanitarian CVA** via:
 - Strengthening collaboration between the Cash Working Group and relevant Government and agency focal points including the Ministry of Gender, Labour and Social Development (MGLSD), UNICEF and WFP;
 - Leveraging the linkages articulated in the Uganda UN Emergency Appeal for Response to COVID-19 Theme 3: Life-Saving Services and Social Protection.⁴⁶

Interagency resourcing

Further developing a common cash operational model – or models – to represent the diverse strategic, operational and programmatic priorities and preferences of the agencies using cash-based programming in Uganda will remain complex and challenging; meaningful progress requires **dedicated interagency resourcing** beyond what currently exists in each individual agency.

- Prioritise interagency coordination and technical support functions (i) located within the Cash Working Group co-lead agencies i.e. UNHCR and WFP; and (ii) via a more permanent Collaboration Manager within the Uganda CCD Network; and further benefit from existing interagency expertise e.g. Consortium Coordinator for ECHO-funded South-West Cash Consortium.
- Continue to support, evolve and resource the Common Cash task force in order to take this workstream forwards on behalf of the Cash Working Group.

Uganda CCD Network

Alongside the refugee response common cash system development being led by UNHCR and WFP, there is a clear role and added value for **further articulating of locally optimised INGO collaboration led by the Uganda CCD Network.**

- To best take this forwards requires a renewed and galvanised CCD in Uganda, based on the process to **reconfigure its governance structure** already underway, and with **strategic, technical and operational support from a dedicated Collaboration Manager.**
- To represent the diversity of strategic and programmatic priorities across the CCD membership, one option to explore is the **formation of two CCD technical sub-groups**⁴⁷ (i.e. subsets of the full Uganda CCD membership). One would focus on further developing a cross-agency set of priorities for and engagement with the UNHCR and WFP-led common cash system and platform within the

⁴⁵ See for example: '[COVID-19 Market Monitoring: Refugee Settlement Price and Market Functionality Snapshot, 15-30 April 2020](#)', Uganda Cash Working Group – Market Analysis Task Force: REACH, WFP et al.

⁴⁶ Source: '[UN Emergency Appeal for Response to COVID-19 and its Impacts: Uganda, April-September 2020](#)' – including:

- expansion of the Senior Citizens Grant programme (SCG), under the leadership of the MGLSD;
- OPM initiatives to scale up existing social protection programmes and re-purpose them to protect the most vulnerable, including the elderly, youth, poor, women, people with HIV, people with disabilities, refugees and others.

⁴⁷ In line with and as proposed in the 'CCD Uganda: (draft) Concept Note for a Collaboration Manager', January 2020

refugee response; and another on one or more parallel CCD-led operational models oriented around cash-based assistance to vulnerable Ugandans – whether disaster-affected, in urban areas, or via social protection/other forms of assistance.

- At global level, within its [Collaboration Products and Services](#), the CCD has a dedicated workstream on **data interoperability**⁴⁸ led by its [data sharing working group](#); this core competence can be leveraged by relevant CCD agency focal points at Uganda-country and global levels in order to drive CCD-led collaboration around the ‘improved beneficiary registries’ core component recommended above.

Additional recommendations

- Strengthen coordination and technical exchange between the Cash Working Group and other key working groups – in particular the working groups for the [Livelihoods and Resilience Sector](#), Education in Emergencies, [Protection](#), [People with Specific Needs](#), and Urban Refugees⁴⁹; and on social protection via focal points including with the Ministry of Gender, Labour and Social Development, and at UNICEF and WFP.
- Continue to explore opportunities to benefit from partnerships with the [REACH initiative in Uganda](#), given (i) the inherently interagency nature of its [organisational focus](#) on strengthening evidence-based decision making by humanitarian actors through efficient data collection and analysis products, working within the framework of inter-agency coordination mechanisms in contexts of crisis, disaster and displacement; and (ii) its existing strong track record of adding value to Cash Working Group priority workstreams e.g. on [COVID-19 market analysis](#), [assessment of vulnerability and essential needs](#), and data-gathering to inform [refugee responses in urban settings](#), and on [refugee access to livelihoods and housing, land and property](#).
- Prioritise **strengthening digital literacy** in tandem with scaling digital cash delivery – including via further leveraging – and collaborating on – existing agency-specific partnerships with [the GSMA](#); and accompanying scaling of mobile money with provision of mobile internet skills training e.g. via the [Mobile Internet Skills Training Toolkit](#) (MISTT), and with a particular focus on addressing barriers to and overcoming gender imbalances⁵⁰ on digital literacy.
- Transition from mapping and analysing payment systems and financial service providers – which has already been relatively exhaustively conducted [see [Annex](#)] – to investing resources in optimising actual cash delivery, including via:
 - A focus on further analysis of the normative framework – including policy and regulatory environment – for both mobile and agency banking, to ensure future decision-making on the most appropriate transfer mechanisms;⁵¹
 - Further collaboration on joint piloting of innovative approaches, and in line with the ‘common cash delivery/transfer mechanisms’ recommendations above.

⁴⁸ “Data interoperability is focussed on helping national CCD networks developing an ecosystem where all cash actors are able to securely and seamlessly access data to meet the needs of affected people. Initial tools include [practical guidance on data sharing](#) and a [data sharing agreement template](#). Another area of work includes researching and possibly piloting a data trust. A data trust is an innovative way to see data as a shared resource that is available to everyone and balances individual, collective, and societal interests.” www.collaborativecash.org/our-work

⁴⁹ An Urban Refugee working group was established in December 2019, under the leadership of UNHCR, to serve as a multisectoral forum / coordination platform bringing together key actors involved in urban refugee response.

Source: [UNHCR Monthly Protection Update: Urban Protection Response, December 2019](#)

⁵⁰ Cf. ‘[The Mobile Gender Gap Report 2020](#)’, GSM Association, March 2020

Key findings include that mobile access and use remain unequal, with women still less likely than men to own a mobile phone, and less likely to use the internet on a mobile; handset affordability remains the primary barrier to mobile phone ownership for men and women; among mobile users who are aware of mobile internet, a lack of literacy and digital skills continues to be the main barrier to use.

⁵¹ e.g. related to SIM card registration; cases where minors hold bank accounts or mobile wallets; dual accounts per household, etc.

Annex: Mapping and analysis on payment systems and financial service providers in Uganda

[‘Financial Inclusion for Refugees \(FI4R\): Results of Baseline Survey’](#), FSD Uganda, March 2020

‘Refugees’ Digital Financial Services Needs: Assessment of drivers, barriers, and solutions for use of digital financial services by refugees in Kenya and Uganda’, DCA and MicroSave Consulting, March 2020
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