

# Standard Operating Procedure (SOP) for Assistance Deduplication

## – Bulgaria Cash Working Group

This Standard Operating Procedure (SOP) establishes a framework to identify and prevent duplicate records in assistance provision, ensuring accuracy and efficiency in delivering aid while minimizing fraud risks in the Cash Working Group (CWG) in Bulgaria.

To enhance the efficiency and effectiveness of assistance provided by individual organizations and the overall response using CBIs, while adhering to the Accountability to Affected Populations guiding principles, this SOP is developed by CWG to harmonize approaches among organizations in Bulgaria.

This SOP has been endorsed by the CWG and will undergo reviews and updates to incorporate the latest developments in the humanitarian context. Furthermore, ad-hoc revisions will be made as needed to address emerging challenges.

### 1. Objective and Scope

The objective of deduplication is to identify, prevent, and address duplication within CWG for cash assistance, ensuring efficient and equitable aid distribution.

This SOP defines the scope of deduplication tools and activities within the Cash Working Group in Bulgaria, including procedures, roles, and responsibilities. It applies to all Cash Working Group members and partners involved in managing beneficiary data, particularly those using databases or systems where identity deduplication is critical.

Moreover, the SOP aims to enhance communication with affected populations and other stakeholders, promoting clarity and consistency throughout the process.

### 2. Deduplication

Deduplication is a process designed to ensure the efficient and equitable delivery of humanitarian assistance. Its primary purpose is to guarantee that each beneficiary receives only one assistance package addressing the same needs from a single organization for the same period.

In principle, whether it be Multi-purpose Cash Assistance (MPCA) or sectoral cash, the assistance by different organizations with the same or similar characteristics (transfer amount, duration, eligibility criteria) is to be deduplicated. CWG members should agree on the programmes, their duration and scope of the deduplication.

Current practices and technical solutions in the MPCA response prioritize assistance deduplication to ensure fair, equitable, and accountable MPCA distribution. Continuous efforts to enhance registration deduplication through technical tools, coupled with close coordination among actors and clusters, contribute to overall response efficiency and effectiveness. The need for registration-stage deduplication can be revisited and addressed in CWG meetings.

Partner organizations have agreed to use the Bulgarian Lev (BGN) as the standard currency for deduplicating assistance.

### 3. Objectives of Deduplication:

- Preventing Overlapping Assistance: Ensures that individuals or households do not receive duplicate aid from multiple sources, avoiding inequitable distribution and resource wastage.
- Resource Optimization: Maximizes the reach of assistance by preventing duplication and ensuring that each aid unit benefits a unique recipient.
- Data Accuracy: Maintains precise records of MPCA distribution to improve planning, reporting, and gap identification in assistance.
- Improved Coordination: Promotes better coordination among humanitarian agencies by enabling accurate data sharing, preventing multiple organizations from assisting the same beneficiaries.
- Transparency and Accountability: Strengthens fairness and justice in aid distribution by accurately tracking recipients and enhancing transparency in the process.

### 4. Responsibilities

#### Roles:

- Data Entry and upload Staff:
  - Ensure verification and upload of the accurate and complete target/ assisted population list.
  - Flag potential duplicates when identified.
- Tool Coordinator: (Amin Abbasi [abbasi@unhcr.org](mailto:abbasi@unhcr.org) – UNHCR, Gökalp Arslan [arslanm@unhcr.org](mailto:arslanm@unhcr.org) – UNHCR).
  - Manage access to the tool (<https://iccp-bg.unhcr.org/Home>)
  - Provide the first line of support
- System Administrator: (Osman Yuncuoglu [siddik@unhcr.org](mailto:siddik@unhcr.org) – UNHCR)
  - Maintain deduplication tools and ensure the security of data.
  - Provide technical support for the tool development.

#### Registration and Training:

The tool coordinator will provide Training sessions for users on the deduplication tool depending on the need and availability. The sessions will be recorded and shared with new partners. Organizations and their active users must participate in user onboarding training whenever possible.

Users are expected to follow the guidelines detailed in the User Guidance for proper system usage, including the complete deduplication process.

#### Access Management:

UNHCR is responsible for user access management in Blind Cross-check. Each participating organization will provide UNHCR with a list of the names of their employees requiring access to Blind Cross-check, along with the requested access level through e-mail. Organizations with active cash programmes will be registered in the system. One user can only have one organization on the platform. However, organizations might have multiple users.

The participating organizations shall respectively designate a staff member of sufficient seniority as focal point, who is responsible for ensuring that only authorized staff members are granted access to Blind Cross-check, based on the functional requirements of the relevant staff members and their "need-to-know", with the required access level. The list shall be vetted and approved by the responsible staff member within the relevant organization before submission to the UNHCR Tool Coordinator. A list of all users with their assigned roles shall be kept updated and accessible to all participating organizations.

UNHCR will designate one or more UNHCR Tool Coordinators in Bulgaria who will be responsible for overseeing the successful and accurate granting of access rights to the requested users. Unless there is doubt regarding the appropriateness of the requested user or the level of access rights, the UNHCR Tool Coordinator will grant and maintain access rights to users as requested by an organization part of the deduplication. The UNHCR Tool Coordinator will also be responsible for documenting the level of access rights granted to each user, along with the username, for oversight and auditing purposes.

The participating organizations accept terms and conditions<sup>1</sup> for use of the platform. Furthermore, UNHCR reserves the right to unilaterally revoke a user's access in the event of any misuse of the platform. Other organizations involved in providing cash assistance to refugees or displaced persons from Ukraine in Bulgaria may join and become parties to the deduplication, subject to the written consent of all current parties and the submission of a formal request to UNHCR via e-mail.

#### **Termination and Withdrawal of Access:**

The participating organization's focal point shall notify UNHCR in writing, at the earliest opportunity, of any discontinuation of access or changes in the level of access rights due to staff separations or changes in their functions. In such cases, the relevant organization shall inform UNHCR at least 7 days in advance of the separation or change in function. Where advance notice is not possible, the organization shall notify UNHCR no later than the same day as the separation or change of function. Unauthorized or inappropriate use, compromise, or exploitation of an organization's access to Blind Cross-check by its users, other employees, or third parties, will be considered a "personal data breach", and UNHCR reserves the right to take appropriate mitigating measures, including suspension of access without limitation.

#### **5. Data points to be collected**

In CWG Bulgaria, the Temporary Protection (TP) or International Protection (IP) numbers issued by the Bulgarian government will be used for deduplication. All individuals considered for assistance within the household should be uploaded for duplication check for MPCA, Winter, and other assistance fitting the scope of deduplication agreed by the CWG. For sectoral or individual-based assistance, all beneficiary individuals' IDs should be uploaded.

- **MPCA and Winterization:**
  - Scope: This programme targets all family members within the household (HH) selected for assistance.
  - Data Requirement: The TP/IP numbers of all individuals in the household must be uploaded into the system.
  - Purpose: Although the assistance is provided exclusively to the Focal Point of the family, uploading the data for all family members enhances the chances of accurate data matching within the system.

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<sup>1</sup> Specified at <https://iccp-bg.unhcr.org/Home/Home/PolicyPage#termsOfService>

- Education Programme
  - Scope: This programme targets only school-aged children (6-17).
  - Data Requirement: Only the TP/IP numbers of the eligible individuals (school-aged children) should be uploaded into the system.
  - Exclusion: Do not upload the TP/IP numbers of other family members or the household's Focal Point for this program.

Harmonizing data collection practices among relevant agencies is crucial to ensure consistency and accuracy in the matching outcomes for data collection and deduplication.

Each actor shall generate files in the appropriate file format as per the template by the platform, which will contain the above identification numbers.

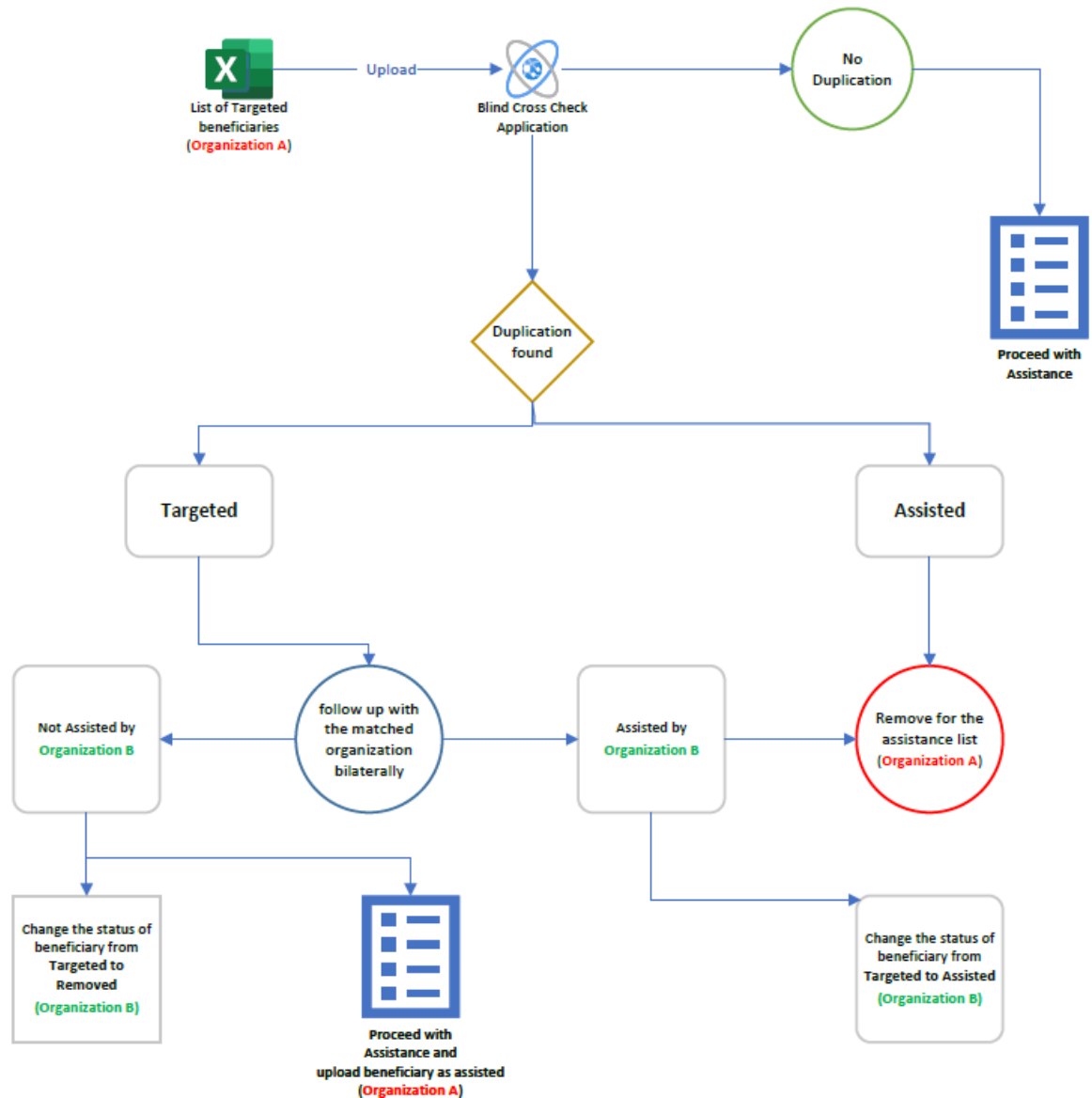
## 6. Frequency of Sharing

Projects for each programme/sector including agreed period will be created and organizations will upload cases for duplication check. The file shall be uploaded to the Blind Cross-check deduplication tool on an ad hoc basis before each payment list processing in the relevant project for the following purposes:

- To check, prior to the execution of cash assistance, whether any records in the uploaded list already exist in the database. This allows the system to identify duplicates within the same assistance period, indicating whether the beneficiaries have already been assisted or are currently being processed for assistance by another actor.
- To submit records in the list as having received assistance for the specified period. The system will compare these records against existing database entries and add new records for future reference.

## 7. Process flowchart

Prior to assistance



## 8. Payment Processing

Deduplication of assistance should be conducted only after household eligibility has been verified through assessments and immediately prior to processing payments. Payments should be processed post-deduplication. The organization that first uploads the successful import is responsible for providing assistance.

In the event of a match, the responsibility of providing proof is shared between the actor receiving the response from the tool (Organization A) and the actor identified as having provided assistance (Organization B) during the same period. The first actor will contact the second to exchange additional

information and jointly verify whether the record(s) correspond to the same person or household. The organization that uploads the case later and receives the match (Organization A) should (refer to the flowchart above for the process flow):

- In case of an “assisted” match, remove the duplicated record from their assistance list and inform the individual.
- In case of a “targeted” match by another organization (namely, by Organization B), (Organization A) immediately follow up with the matched organization bilaterally to verify the status of the matched record:
  - For this verification, further information will need to be provided shared in a secured manner (e.g. password protected file with encryption), including:
    - first name,
    - family name,
    - date of birth.
  - If the assistance is confirmed, the organization that has already provided the assistance (Organization B) should update the status from “targeted” to “assisted.” The organization that has not yet provided assistance (Organization A) must remove the individual from their assistance list before sharing it with their FSP and notify the individual.
  - If the assistance is not confirmed and will not be provided by the previous actor (Organization B), Organization B should change the status from “targeted” to “removed” and inform the individual that no assistance will be provided. Organization A should then update the person’s status from “targeted” to “assisted” and proceed with the assistance, notifying the individual.

Additionally, both organizations must communicate with the households/individuals involved in the partial hit to verify the accuracy of the information in their databases. Any discrepancies identified will be shared with UNHCR to update relevant records in the database and preventing future false duplications.

Cash actors are committed to removing from any lists shared with their FSP all records/households corresponding to individuals identified by the tool as already having received assistance.

## 9. Data retention

Assistance records will be retained in the system until one month after the completion of the CBI programme by an organization and then to be deleted by each organization's focal point or designated user.

As the record is hashed and stored using a hashing and salting method as a one-way encryption process, the system will only store the hashes. The technical administrator, Osman Yuncuoglu, can clear databases and projects upon request with DIST's assistance.

## 10. Tools and Technologies

**ICCP system:** The Blind Cross-check is a web-based system built to reflect the above deduplication process flow. It is hosted on a secured network (Cloud), The application and database have been published in AWS cloud services. With DIST's configuration, the application has secure WAF (Web Application Firewall) and network configurations and system administrators cannot access any information or details stored/processed in the system. Refer to the ICCP Interagency Cross-Check Platform User Guidance for more information.

## 11. Data Minimisation, Access Control and Confidentiality

The tool:

- Follows data minimization guidelines to ensure confidentiality.
- Encrypts all personal and sensitive data:
  - The tool encrypts all personal and sensitive data from the user's computer to the server.
  - The encryption utilizes a one-way algorithm, making decryption impossible, even for the tool owner or developer.
- Limits access to deduplication tools and flagged records to authorized personnel only.

Each organization is responsible for ensuring the accuracy of the data they provide, maintaining the integrity and reliability of the information shared within the scope of deduplication.

## 12. Responsibility Relating to Data Subjects

The organizations commit to upholding the rights of data subjects, including the rights to information, access, correction, deletion, and objection, in line with applicable laws and their respective data protection frameworks. To this end, the organizations will establish and implement appropriate procedures to ensure these rights are respected.

Specifically, the participating organizations will ensure that data subjects are adequately informed about processes involving their data, such as the deduplication process, including the specific data elements being processed by each organization for this purpose.

The relevant organizations will address unlawful, unnecessary, or inaccurate data entries by making corrections or deletions as needed. These updates will be promptly communicated to UNHCR, as appropriate, including the submission of corrected files to ensure data accuracy and integrity.

## 13. Reporting and Monitoring

The tool includes a reporting feature for users with report roles, accessible via the left panel. It enables efficient analysis and monitoring of project data, including record management, data imports, and duplication checks. Refer to the ICCP Interagency Cross-Check Platform User Guidance for the access, use and functions of the reports.

## 14. References

- Cash Working Group Meeting Minutes 15.10.2024
- ICCP Interagency Cross-Check Platform User Guidance

10 December 2024