External Review

Bangladesh Floods and Landslides 2012 SE Cash Transfer Project Review

the International Federation of Red Cross and Red Crescent Societies

Ben Mountfield 23 September 2013



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An overview of the review process

Background

The International Federation of the Red Cross and Red Crescent Societies (the Federation), on the request of Bangladesh Red Crescent Society (BDRCS), launched an Emergency Appeal for Bangladesh Floods and Landslides on August 2012, building on an earlier DREF allocation. The appeal was for CHF 1,753,139, and targeted 9,500 families over a period of 10 months, which was later extended by a further three months.

The Emergency Appeal operation includes relief and recovery interventions in shelter, WASH, emergency health and care and livelihoods, and it was intended to cover two separate areas of intervention, in the N and the SE of the country. It was intended to use a cash-based approach to meet some of the assessed needs: this would be the first time that BDRCS had used cash at this scale.

The cash based intervention received earmarked funding from donors such as DG ECHO together with matching funds from other sources. ECHO funding was earmarked to the southeast: Cox's Bazar, Bandarban and Chittagong.

On 19 March 2013, after receiving IFRC's first interim report, ECHO raised concerns on the unsatisfactory project performance by BDRCS/IFRC. Two months later there were allegations of misuse of funds against BDRCS, which were reported by local newspapers. Following the allegations, BDRCS conducted an internal investigation and produced a report that was shared with IFRC.

The cash based intervention project is completed before the project deadline date on 30 June 2013. In parallel to the BDRCS investigation, IFRC produced a Real-Time Status Report, which chronologically documented activity progress, HR level of involvement, challenges and management actions to overcome those challenges. It is shared on 17th July 2013.

As a result of the challenges in management, implementation and reporting, it was determined to engage an external consultant to lead a review process, focussing on the cash transfer processes and the recovery operations in the SE, and to facilitate a Lessons Learned Workshop with the key stakeholders.

This document is the report for the review process: the report of the Lessons Learned Workshop has been produced separately.

Review team

Core members:

Ben Mountfield, team leader, independent external consultant **Munira Hamza**, Senior Field Auditor, Risk Management and Audit, IFRC

Support members:

Md. Belal Hossain, Director Response, BDRCS

Md. Adith Shah Durjoy, Senior DM Officer, IFRC Dhaka.

Note that this team does not reflect the full ambition expressed in the TOR.

Review methodology and evidence base

The review adopted a mixture of qualitative methods to explore the questions raised in the Terms of Reference. It used software developed by the team leader to manage the various sources and preliminary findings and associate them with the TOR questions. It kept an open-ended approach, exploring additional relevant angles in addition to the specific questions, where these seemed in keeping with the main purpose.

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Documents considered as part of the review process

Terms of Reference

Tripartite Agreement BDRCS / IFRC / PNS

Letter of instruction to Branches

Appeal DREF

Emergency Appeal

Plan of Action

Operations update 1

Operations update 2

Operations update 3
Operations update 4

IFRC/BDRCS Cash Guidelines and annexes

One-pager guideline on roles and responsibilities for ECHO operation

ECHO Single Form

ECHO Contribution Agreement ref:

ECHO/BGD/BUD/2012/91015

Pledge M1212066

ECHO Interim report 1

ECHO interim report 2

ECHO Operational overview

Various email correspondence between ECHO

and IFRC

Real-time status report

HKRC budget

Various news articles and associated emails

BDRCS investigation report

BDRCS/IFRC investigation report

BDRCS Investigation report comments

Key informants KL (all IFRC)

Al Panico Head of Operations

Clarence Sim Planning and Reporting Officer

Fui Len Wong RM Officer
John Gwynn OD Coordinator

Karen Poon Operations Coordinator

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Key informants Dhaka

BDRCS

Professor Dr M. S. Akbar Chairman

BMM Mozharul Huq Secretary General

Md. Belal Hossain Director Disaster Response

Matiur Rahman Director OD (previously Director Disaster Response)

Md. Nurul Amin Assistant Director, Disaster Response
Md. Jahangir Alam Jr. Assistant Director, Disaster Response

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Olivier Brouant Head of Office
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Others

Dave Mather BRCS Country Representative

Stella Tsang HKRC International and Relief Service Officer
Seeta Giri UNDP Project Manager, Early Recovery Facility

Md. Obaidur Rahman Muslim Aid Country Director

M.A. Wahed Care Bangladesh Emergency Response and Preparedness Coordinator

Field visits – key informants and focus groups

The review team undertook some 29 focus groups, based on the type of support received, including over 200 beneficiaries. In addition, in each location, a physical inspection of the CFW project was undertaken, and informal discussions were had with local officials, beneficiaries and non-beneficiaries.

Upazila, District	Union	Village	Component	# M	# F
Chakaria, Cox's Bazar	Boroitoly	Poshim Khoirati para	CFW	6	
		Poshim Khoirati para	CFT		5
		Poshim Khoirati para	UCG	2	3
		Mosniakata	CFW	5	
		Mosniakata	CFT	6	
		Mosniakata	UCG	2	2
		Bahirmat	CFW	16	
	Dochori	Bahirmat	UCG	2	6
		Bahirmat	CFT		7
		Baghanghona	CFW	8	
		Baghanghona	CFT		5
Naikhanchori,		Baghanghona	UCG	1	1
Bandarban	Naikhanchori Shadar	Khotikata	CFW	12	
		Khotikata	CFT		6
		Khotikata	UCG	2	3
		Rosulpur	CFW	12	3
		Rosulpur	CFT	4	8
		Rosulpur	UCG	5	6
		Modho Kawerkhop	CFW	7	
Ramu,	Kawerkhop	Modho Kawerkhop	CFT		10
		Modho Kawerkhop	UCG	2	
Cox's Bazar		Monirjhil	CFW	13	
	Kocchopia	Tulatoli	CFT		5
		Titarpara	CFW	8	
Shadar, Cox's Bazar	PM Khali	Central bazar	N/A	2	2
		Shikderpara	CFW	10	
Moheshkhali,	Matarbari	Shikderpara	CFT		4
Cox's Bazar		Shikderpara	UCG	6	7
		Old Block Side	CFW	7	
totals			29	131	83

Workshop overview

The one-day workshop provided an opportunity for stakeholders to present feedback and observations about the operation in an environment where the casual factors could be isolated and explored, and different perceptions could be shared and challenged. The workshop approach fell into two parts. In the morning, a retrospective approach was taken to the operation; while in the afternoon a forward looking approach was adopted.

The retrospective session looked at the specific problems that arose during implementation, and the afternoon session looked forward to a future programme, and used a risk register approach to identify potential issues and seek solutions to them.

The workshop has been written up in a separate, partner report.

The framework

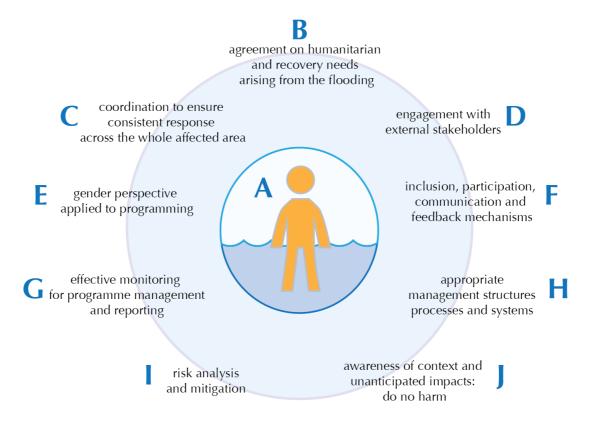
To aid the process of sorting the various opinions and perspectives, the following model was used throughout the workshop.

At the centre of the model stands the flood-affected population – both beneficiary and non-beneficiary. Their experience is the central measure of the quality of the response.

Around this are a number of elements that are considered to be good practice in humanitarian and early-recovery programming, and which combine to provide confidence that the resultant programme will be of high quality.

The letters in the diagram were used for clustering findings and observations during the workshop processes. This framework will also be used for the review findings, to allow for consistency between the two reports. Annex 3 contains a table showing how the subsections of the TOR relate to the framework used here.

Figure 1: the framework used for the workshop



Acknowledgements

The review team would like to sincerely all those who contributed time and effort to the review process, and the participants in the lessons learned workshop. Everyone was very open about the challenges of the past and clearly committed to building stronger systems, managing relationships better, and delivering higher quality programmes in the future. Particular thanks should be given to those who accompanied the review team on the field trips, and to those who put in extra hours in the evenings and weekends to contribute to the process in many different ways.

Evaluation and review processes always uncover different perspectives, and the evidence base does not always lead to concrete conclusions. Despite revision processes, errors will creep into the reports. The review team leader would like to apologise for any such errors or gaps, and takes full responsibility for them.

A note about lessons 'learned'

It is common parlance for evaluations and reviews to talk confidently about lessons learned, and it is deeply misleading: it is equally common for such 'lessons' to be forgotten on a shelf while the same mistakes are repeated.

It was made explicit during the workshop that the expectation was that the issues identified through the workshop processes, and the recommendations of the independently led review team, would need to be considered by the management teams of each major stakeholder. Individual recommendations could be accepted or rejected, but the decisions should be documented and the implementation of such recommendations that have been accepted should be followed up.

In short, lessons can only be considered to have been learned, once they have been consistently applied to the management of future operations.

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Findings

A. The experience of the flood-affected population

Impact

This is the core measure of the programme, and although an evaluation of impact evaluation falls outside of the TOR, it is worth exploring this briefly as it provides context for the other observations.

Beneficiary response to the programme was extremely positive, regardless of the component from which they benefited: Cash for Work (CFW), Cash for Training (CFT) or Unconditional Cash Grant (UCG). The beneficiaries' feedback on the targeting, the size and impact of the grant, the quality and value of the training, and the physical works undertaken was all positive.

That said, the response was fairly late. Not just in terms of the contractual obligations to the donor, but in terms of the needs. The earliest the CFW could have been undertaken, for example, is the end of the monsoon in November. Instead it started in February.

The value of the cash grant was set at BDT 8,000 per family (about CHF 100) during ECHO partner coordination meetings. BDRCS were unhappy with this, preferring a grant of BDT 10,000. No detailed justification was put forward for either amount.

Focus group discussions revealed that a minority of people used the money exclusively for basic needs, while a majority were able to restore their livelihood base by investing the money into productive assets such as livestock (hens, ducks, goats and occasionally calves), into their farming activities or occasionally fishing, or into other productive assets such as a sewing machine, a tricycle rickshaw or forestry. Several people spontaneously suggested that the money had prevented asset depletion. A small proportion of beneficiaries were also able to use some of the money to make repairs to their shelter, although the amount provided was not sufficient for substantial repairs.

The cash transfers, then, were generally sufficient to meet the food security needs that were the priority of the main donor, but not enough to address the broader recovery needs identified in the Joint Needs Assessment.

Targeting

Other ECHO partners estimated the proportion of UCG beneficiaries to be 5-10% of the population, and used this proportion as the basis for their targeting. For BDRCS, 50% of the beneficiaries were in this category, although BDRCS were not claiming that they represented 50% of the population. The Federation reporting has not helped to clarify this situation; although it is surprising that this issue persisted after the ECHO field visits. ECHO's initial understanding was that the difference was a result of variations in targeting criteria between partner organisations, and this may be partially true. The main part of the explanation probably relates more to priorities and philosophy: BDRCS were prioritising this group, over others in the community with greater capacity for self-recovery. This approach is consistent with BDRCS' policy, but it still raises concerns about inclusion errors: were all the UCG beneficiaries properly targeted?

The evidence from focus groups in the field is reassuring: attending beneficiaries were clearly well qualified. Some 50 UCG beneficiaries attended 8 separate focus groups during the review process. However, the review team did not select random names from the beneficiary list and summon them, preferring to meet with beneficiaries who were able to make the time to meet, so no statement can be made as to whether these beneficiaries were fully representative. Verbal feedback from ECHO following a field visit, reported interviewing some UCG beneficiaries where the targeting was questionable. A field visit from HKRC did not report any issues in this regard.

When the UCG beneficiaries were interviewed in the field, the review team consistently asked them if there were other people in the village who were in a similar situation to them, who did not receive support. The answer in every case was 'yes'. This suggests that demand was significantly higher than supply, and consequently that there were potential issues of exclusion – even when 50% of BDRCS beneficiaries were drawn from this category.

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One area of concern for ECHO was the involvement of government lists and influence in beneficiary selection. This is covered below in sections D and F.

Payment mechanisms

When asked about disbursement preferences, the beneficiaries did not provide consistent answers. Many did prefer direct cash over cheques, but one group of women (for example) stated robustly that they preferred the cheque, as it gave them an opportunity to go out as a group to the town: an unanticipated social benefit. A robust post-distribution survey could explore these sorts of issues in more detail.

The experience of non-beneficiaries

Because of the weakness of the monitoring system, and the design of the review fieldwork, little is known about the experience of non-beneficiaries. Those in the targeted villages had an opportunity to approach the review team during the fieldwork period, but few did. Those in non-targeted villages had no such opportunity.

B. Agreement on humanitarian and recovery needs arising from the flooding

It is first worth noting that the Federation Appeal effectively combined two very similar flooding events, which happened almost concurrently in the N and the SE of the country. The needs-assessment processes for these two events were separate, and the donors treated them as separate events. This review only considers the response in the SE Floods and landslides Early Recovery operation, which eventually formed the major part of the response under the Appeal.

It is encouraging to see an interagency needs assessment with leadership demonstrated by the government authorities, coordination from the Early Recovery Cluster and the engagement and resources of other clusters and major humanitarian actors all being used for a common purpose. The Joint Needs Assessment 3 (JNA) was a multi-sector, multi-agency assessment process in the SE, and it was reported to be the first of its kind in Bangladesh.

It presents a common basis for programming decisions, and was accepted as such. The initial plan to have a Household Economic Assessment study (HEA) for the SE was dropped and the JNA was used instead. Unfortunately this change is not reflected in the monitoring tools, and the abandoned HEA still features prominently both in the single form and the Appeal monitoring frameworks.

The document is professionally produced, but does not live up to its early promise. It adopts a community-level approach, but presents information at household level – information that is not qualified by sampling frames or seasonality, undermining its value. In addition, it does not always distinguish between the reference situation (pre-disaster) and the baseline (post-disasters, pre-response) situation, undermining its utility as a comparison for impact studies. Although nominally multi-sectoral, it does not include health data or analysis.

Given the nature of the disaster, a standard proxy indicator for food security might have been considered, such as the Food Consumption Score. This would have contributed to targeting discussions and made impact monitoring much easier after the response was completed. The inclusion of income data tells us little and is potentially misleading. The section on coping strategies is more helpful and could have been used as a basis to assess impact and to strengthen the monitoring framework.

The JNA did not attempt to explore the needs in every affected area, selecting a sample of representative areas with an intention to extrapolate findings more widely. However, it appears that preference was given during targeting to those areas that were directly included in the assessment: a mistake that would probably have been avoided if the assessment and the implementation phases had a common coordination mechanism – see below.

Despite these weaknesses, the JNA has real value, because of its cross-agency ownership and its broadly multi-sectoral outlook. It is not clear why this multi-sector approach, which was echoed in the Federation appeal, was not adopted by the donor community.

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C. Coordination to ensure consistent response across the whole affected area

Initial coordination was led by the Early Recovery cluster and resulted in the JNA and a broad agreement on the approach to be adopted. As ECHO emerged as by far the largest likely donor, the gravitational centre of coordination shifted to ECHO, and the eight potential ECHO partners worked together in a field-based coordination meeting, hosted by IFRC, to agree the most affected districts and sub-districts on the basis of the JNA and share them out between them. ECHO leadership at this phase was quite firm: the three types of activity (cash for work, cash for training, and unconditional grants) were agreed, as were the grant amounts in each case and the targeting criteria – although these were differently interpreted by various agencies in practice. It seems to have been at this stage that the JNA districts morphed from being a sample to being the target locations.

However, ECHO then funded just 6 of the 8 agencies, leaving some selected areas uncovered, and the agencies jumped into these parts in a fairly uncoordinated way which led to some near-overlaps, and some inter-agency finger-pointing. The worst situation was in Ramu, where three agencies all operated, although in different wards, which must have been a headache for the local authorities. While it is not ECHO's responsibility to lead coordination, the mixed messages sent by the initially hands-on, and subsequently hands-off approach, may have contributed to the confusion. In the end, however, no harm was done.

ECHO is perhaps the leading donor in emergency response in Bangladesh, and ECHO were explicit that they would only support agencies working in food security and only in the SE. Other donors appear to have followed this lead, which undermined the likelihood of an effective integrated response. The humanitarian environment in Bangladesh appears to be rather too donor-led for comfort.

At the level of targeting affected areas, it is worth noting that the demand exceeded the supply: that certain areas were always going to be left out. The same appears to be true at the level of targeting beneficiaries, which is covered in more detail below.

There was a disagreement on the identification of target areas needs between BDRCS at the Unit level – in Cox's Bazar – and the various coordinators based in Dhaka. This was driven by two factors: the incomplete overall coverage and the use of the JNA sampling approach for targeting identified above. This kind of debate is normal and even healthy. It was a factor in the eventual selection of districts such as PM Khali and some island locations.

IFRC did not effectively communicate to ECHO the reasons for the changes, or the source of the differences of opinion, and that raised questions about the criteria being used for selection. The political context of Bangladesh being what it is, ECHO is completely right to raise such issues of geographic targeting as the potential for exploitation is always present: the mechanisms for such selection need to be explicit, and the decision criteria and processes need to be documented.

The review found no evidence that political or personal influence played an important role in the selection of target areas. However, it does not find robust evidence that they did not, as neither the criteria nor the decision-making are sufficiently well documented.

In the end, PM Khali was not included within the programme, and this decision was not formally communicated to ECHO (see below for details on the PM Khali situation). This again sent a message to ECHO which suggested that RC/RC was not consistent in its approach, further raising concerns.

D. Engagement with external stakeholders

BDRCS and government

Representation within the humanitarian system in Bangladesh is largely reserved for international actors, which effectively undermines BDRCS and places IFRC in a role that is at least partially compromised. This is not unusual, but it would be helpful for BDRCS to have their own seat at the table, even when the local NGO community is excluded. BDRCS is included at all levels of Bangladesh government disaster management coordination system, from national level to union level.

The donors have a slightly contradictory approach to their partners' relations with government. On the positive side, the need for INGOs and their NGO partners to gain approval for projects is a huge constraint, and BDRCS has the massive advantage that it can normally operate without this clearance. Local authority contributions to the CFW projects – in terms of high quality guidance on project

identification and physical contributions like bricks for road surfaces – have been very positive. On the other hand, the donors worry that the government has undue influence, and the fact that the BDRCS chairperson is a serving MP, appointed by the state, is a real area of concern for them.

Important work is underway to review the legislative base of the national society, and if successful, this would provide a foundation for substantial change in the way that BDRCS operates. In the meantime, there would be value in IFRC working with the ECHO office to ensure a more rounded and nuanced understanding of the nature of the Red Cross & Red Crescent Movement, the auxiliary role the national societies have to governments, the opportunities and constraints that this role brings in the context of Bangladesh, and the very practical nature of the BDRCS' *Independence*.

Some of the BDRCS written and verbal reporting sends mixed and perhaps confusing references to local authority involvement in beneficiary selection, including lists of affected areas. Once again, this lack of clarity has raised concerns within ECHO. During the review process, descriptions of the level of involvement of the local authority varied between key informants and between areas, particularly in terms of the origin of the initial list of affected people.

In practice this is probably realistic: the existence of a list may depend on the level of engagement and the proactivity of the local authorities, and its validity may depend on a wide number of factors operating at the local level. The government has, after all, the primary responsibility for the response to disasters, and where data exists it would be wrong to dismiss it, but it clearly needs to be used with caution.

In every case, however, it was clear that the BDRCS took ownership of the list itself and used trained Red Crescent Youth (RCY) members, and highly trained National Disaster Response Team (NDRT) members, to collect and validate the data, going from house-to-house for collection, and validating the final lists with the whole community. Again, what is missing is clearly documented operating procedures, uniform application of them across all project areas, and consistent and unambiguous reporting.

In essence, then, *auxiliary to government* does not equate to *agent of government*. BDRCS works hard to ensure and protect its independence from government. Where government and BDRCS priorities overlapped, this resulted in brick tops on paths and other interventions: this is good practice and should be encouraged. Where they did not overlap, for example in the selection of target areas, there is no evidence that BDRCS took direction from the authorities.

IFRC systems

IFRC was well aware of the sensitivity of this project, and its internal systems meant that most communication, at least for the early months, passed along the formal reporting line via KL and Geneva. This may have discouraged effective informal information sharing during the early months, with subsequent negative impacts on trust and accountability.

E. Gender perspective applied to programming

BDRCS is typical of Bangladeshi institutions in that the gender balance in terms of staffing is heavily skewed towards men: this is true both in the directorate and in the field positions. Although this is a reflection of Bangladeshi society, perhaps more could be done to address this through the organisation development function, especially through a more robust approach to competency-based recruitment. It will, of course, take time for new recruits to progress into senior positions within BDRCS.

The delegation does not set a particularly good example in this regard, and here it would be easier and quicker to make some substantial changes. This is not to suggest a quota approach in either case: just to ensure that recruitment procedures are such that an appropriate cohort of female candidates is available to the selection panel.

However, gender balance is a very simplistic way to consider this important issue. What is needed is a detailed and nuanced understanding of the different roles and responsibilities of men and women, boys and girls throughout the affected parts of society. This will vary between different groups: ethnic groupings, by livelihood strategy, according to urban/rural, and as a result of poverty and vulnerability. In a cash programme, it would be important to understand how decisions about household expenditure are typically made, and use this as one component in decisions about making payments in cash or by cheque, at once or on a weekly basis, and to men, women, or both.

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There is some evidence that gender and age were given informal consideration during the programme design phase. Once again, however, this is not reflected in the documentation: neither the Plan of Action (POA) nor the Emergency Appeal make any mention of gender at all, while the ECHO proposal is only a little stronger, and is neither realistic nor realised. In section 5.3 of the proposal, it states "Participation of women and other vulnerable groups in planning and decision-making will be supported and is a critical part of the early recovery." The sad reality is that no effort was made to include vulnerable groups in the planning of projects, and the whole operation was delivered in a very top-down manner.

F. Inclusion, participation, communication and feedback mechanisms

The section above on gender is, in effect, a special case of this broader set of expectations. The findings are very similar.

BDRCS undertook a community-level validation of beneficiary lists, although the specific process may have varied from one location to another. One common mechanism was the publication of lists of beneficiary names, but the levels of literacy are low, and within the UCG group extremely low: this approach is not inclusive. It was reported that some of the INGOs within the ECHO project adopted more substantial mechanisms for validation and community engagement: perhaps lessons could be learned from their approaches.

Beneficiaries in focus groups had only a weak understanding of why they had been selected, identifying poverty and vulnerability as the criteria but without being able to offer any further information.

Beneficiaries had very few complaints about the projects, but if they had any, they reported that they would know how to make their voice heard. However, the mechanisms they suggested were effectively independent of the project itself, involving local authority figures and community leaders. The feedback mechanisms within the project were weak, and again, depended too much upon the written word.

The selection of the physical projects for CFW was led by the local authority, based on the JNA implementation strategy. While this is not a participatory approach, it was mentioned in the ECHO single form and is a commonly accepted practice for all the ECHO partners.

G. Effective monitoring for programme management and reporting

Monitoring systems and the quality of the proposal

BDRCS appear to have reasonable systems to monitor their internal systems and process for cash distributions. Beneficiary lists were collected at the HQ level and were available for inspection by the review team, as were the records of the cash transfers themselves.

BDRCS also have mechanisms for tracking the changing context of their interventions and the implications of their actions, and to a degree, responding to these in an operational manner. However, these systems are informal and qualitative, and there is a potential gap in communication with IFRC on such issues. This potential becomes an actual gap at the point of reporting, to the degree where the reporting can appear evasive or contradictory.

In terms of the monitoring of impact, and making higher-level decisions about programme implementation, there is no evidence that such systems exist beyond an anecdotal level.

This is evidenced right from the start of the programme. The objectively verifiable indicators of logframe were very weakly defined in the POA and subsequently in the Single Form. In several cases targets are missing, indicators are not well defined, and the means of verification are completely inappropriate. This results in part from the use of the JNA as a basis for programme design, but is primarily an internal weakness. These issues were not picked up by ECHO at the time that the proposal was first submitted, or in the several rounds of review that took place before it was approved. When a donor accepts a proposal with a very weak monitoring framework, they must share some responsibility later, when reporting is inadequate.

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These two documents are shared by IFRC with BDRCS at the Dhaka level. However, the working approach of BDRCS is to issue instructions from Dhaka in the form of a letter of instruction to the concerned Units. This does not contain detailed information about indicators or other essential programme information. Units did not receive a copy of the Single Form, or the Federation POA: only a highly simplified version in table form was given to the Units.

Both the Appeal documentation and the ECHO submission pass through the DMU in KL for technical input and approval. Responsibility for the poor monitoring framework must be shared between all stakeholders to the process: it is very difficult to understand how such a weak proposal was accepted by any of them, let alone by all.

Reporting

According to the proposal, ECHO have the right to expect disaggregated beneficiary profiles built up from household surveys. Such surveys have not taken place, and are not planned, but this is in part an outcome of the ECHO-approved decision to go ahead with programming on the basis of the (community level) JNA, and not undertake a full HEA exercise. No final impact is planned, and perhaps surprisingly, impact evaluation is not part of these TOR.

An impact evaluation survey might provide a useful evidence base to demonstrate the value of the programme in the future, and provide an additional basis for learning lessons, and it should be seriously considered if funds are available.

The reporting to ECHO has been weak and has sometimes appeared evasive. There are a number of factors that have contributed to this: many of them avoidable.

While the management structures in the field were appropriate, it appears that information was not being acted upon by IFRC and BDRCS at the management level. This may be because the relevant information was not moving swiftly enough up the management chain. It may be because IFRC management, which was in a state of transition, paid it insufficient attention. It is likely that both factors played a part.

Soon after the first interim report was submitted there were serious allegations made against BDRCS in local papers in Cox's Bazar. These were investigated by BDRCS. The investigation took some time: it ran from 14th May to 10th of June, and the translation of the findings took rather longer. IFRC did not have access to the report until 14th July: it was therefore difficult for IFRC to present the full picture in time for the second interim report, and subsequently IFRC requested a reporting delay. Requesting the delay, however, appears to have sent misleading signals to ECHO.

In addition, the quality of the reporting has been questionable. Some of the justifications for delays, for example, are poorly explained and only provide a partial explanation. Again, this was perceived as a lack of transparency, and generated a set of additional questions to IFRC.

Considerations for the future

The review team would have liked to see:

- A more nuanced baseline
- A set of outcome scenarios, linked to a detailed risk analysis
- A monitoring plan with well defined and qualified indicators, relevant MOVs, and a complete set of targets
- The monitoring plan to cover three different types of indicator: context and risk; internal BDRCS and IFRC processes; and results for the disaster-affected population
- A more substantial field monitoring presence with a focus on qualitative monitoring as well as quantitative monitoring of processes
- The use of standard tools to determine impact

Looking more widely, and given the frequency of disasters in parts of Bangladesh, it would be valuable to have a more substantial dataset in focus areas. This would document the 'normal' or reference situation, and provide a fixed point against which to measure both disaster impact and programme outcomes. HEA approaches could be considered, but the information would ideally be multi-sectoral. This is beyond the scope of the TOR, but could be considered by those responsible for coordination.

H. Appropriate management structures, systems and processes

BDRCS structure and the response

BDRCS is not an NGO, but a volunteer-based society with a technical, paid secretariat headquarters in Dhaka. It does not respond to emergencies by recruiting large numbers of short-term staff and deploying them, but by mobilising existing volunteers, and recruiting new volunteers if necessary. In terms that are perhaps over-simplified, these volunteers can meet demands of scale (through the RCY) and technical expertise (through the NDRT). With a long and respected history in disaster response, these volunteers are the proven backbone of the national society.

The management structure of BDRCS is flat, with the many Units (branches at district level) reporting directly to the HQ. Each Unit has a single staff member – the Unit Level Officer (ULO). When a disaster occurs across a number of districts, it is normal practice for BDRCS to create a temporary level for coordination, in which a small number of branches are clustered together. In this response, one such post was created, based initially in Cox's Bazar town and later within Bandarban district. This post, the Livelihoods Officer, was a coordination and quality control role, while operational budgets were held at the Unit level in the three unit offices, in Cox's Bazar, Bandarban and Chittagong.

In its supporting role, IFRC placed staff in the field in each of the three operational Units, and one staff member as the counterpart to the Livelihoods Officer, at the level of the coordination. At the start of the operation, IFRC and BDRCS held a joint workshop in the field to explain the programme and ensure effective operations. The two structures (BDRCS and IFRC) were well aligned with clear counterpart relationships. It is not clear that roles and responsibilities were sufficiently separated, and IFRC staff may have taken a stronger role in implementation than would be considered normal or appropriate.

At the HQ level, however, there is also evidence that people had too many responsibilities to focus effectively on this response. No additional people were recruited at this level for the project, which increased the workload on some already busy people – and at a time of staffing changes.

It is well documented that the operation was slow to get going, and in some places the implementation stalled once it was underway. Once the senior management became aware of the problems – rather too late for comfort – two key members of BDRCS staff were replaced: the Livelihoods Officer at the coordination level, and the ULO in Bandarban. The order to reassign at least one of these staff was challenged, and took some time to be realised: this contributed to the delays (see below). These newly appointed staff were not given the same induction as their predecessors, but nonetheless both made a significant contribution to the improved programme delivery.

Later still, a 'reshuffle' of the directorate in BDRCS led to a change in Relief Director (amongst 7 reappointments at the same time): this happened shortly after the report of the internal investigation into the events in PM Khali.

Recruitment practices

BDRCS staffing systems have not kept up with broader changes in the humanitarian sector and do not reflect good practice. Hiring of staff is highly centralised (along with many other management decisions) and in practice it is the privilege of governance, although it is the management that then issues the formal instructions. It appears that too little emphasis is placed on competencies during recruitment processes.

This means that the door remains open to appointment making becoming influenced by other factors: political influence, personal favours, or geographic allegiance. It is outside the scope of these TOR to make judgements about the degree to which this is a reality: the important point is that in the current system it remains a distinct possibility. It would be very helpful to reduce this risk by strengthening various aspects of the HR system, and this is well recognised by IFRC: work is underway in this area.

Leadership

Leadership roles are very well understood within BDRCS, but are not defined in writing. In considering leadership, the strong organisational and cultural differences western donors (and IFRC) and BDRCS are an important factor, as is the demonstrated ability of the IFRC delegation to facilitate

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and manage relationships between them. However, in the early parts of the operation, this ability was not effectively utilised.

The leadership of IFRC did not provide adequate information to ECHO about challenges faced for the first months of the operation. It is not clear to what degree the IFRC leadership in Dhaka had access to detailed information about the challenges being faced in the field at this time, or if they were not paying sufficient attention to this information. Changes, gaps/acting in IFRC delegation leadership were a major factor here.

BDRCS and IFRC roles and responsibilities

The Appeal and the first Operations Update make reference to a Tripartite Agreement that specifically relates to the POA. This does not exist, and the reference is misleading. There is, however, a general tripartite agreement that was developed (or improved) as part of the 2012 pre-disaster planning.

This "tripartite agreement" takes the form of a fairly detailed MOU between BDRCS, IFRC and the PNS. This is explicit about the roles and the responsibilities on each party, across four key areas:

- Operational responsibilities
- Coordination mechanisms
- Acceptance of international assistance
- Agreement on specific standards

There is also a very light, one page instruction in Bangla sent from the HQ to the branches, which relates specifically to operations under the Federation Appeal.

Within BDRCS, roles are clear but not documented, which means that they may not be well communicated to IFRC and other stakeholders.

It seems that IFRC's role has been migrating over recent years towards a more operational mode, and the influence of ECHO and others on this is not healthy. Work is needed to re-establish the technical support and coordination role of IFRC, and protect the implementation role of BDRCS.

BDRCS and IFRC pay scales are very poorly aligned, and recent pay rises within the Federation have made matters worse. This can lead to very unbalanced counterpart relationships, which may also encourage the Federation towards decision-making rather than technical support.

Many of the PNS also work in a much more hands-on manner, sometimes closely with BDRCS and some of them in a manner that is almost 'unilateral'. BDRCS might take steps to manage this better, if only to ensure that the capacity being built is really captured within BDRCS and not just held within the PNS locally recruited staff. The pre-disaster agreement states that it will be shared with all new PNS partners for signature: it is not clear if this is actually used as a pre-requisite for them to be working in Bangladesh.¹

Cash grant processes and procedures

IFRC and BDRCS have a shared set of cash transfer guidelines developed in 2012, with a comprehensive set of annexes.² They are still marked as 'draft', are not yet available in Bangla, and do not yet appear to have been shared with all the branches, or with the NDRT.

Full lists of beneficiaries etc. were made available to the review team. Financial records within the IFRC appear to be generally well kept.

The cash grant forms used in the field are good. Those without national ID cards can qualify with a letter from authorities: other agencies reported similar practice. Beneficiaries needed to expend about BDT 100 for photographs at the start of the process, and some also needed to spend money to reach the bank to gain payment. It is not clear that this expenditure had been included in the grant amount calculation.

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¹ See Clause 2 of the agreement: *Purpose*.

² BDRCS Direct Unconditional Cash Transfers In Emergencies

Information management

While beneficiary's personal information was well managed, that does not imply that adequate information was generally available to programme managers, or that appropriate decisions were consistently taken. Decisions about the amount of information to share with ECHO in the early months of the operation, for example, seem to have been very poorly judged. Key informants reported a nervousness about the ECHO relationship, which may have led to an understanding that all communications had to come through KL, which in turn reduced the levels of sharing and transparency in the field.

Reporting lines were generally followed, although with some exceptions. For example, the Livelihoods officer in BDRCS (at the coordination level) was not working in the appropriate manner with all colleagues at the Unit level, or at the HQ level. This appears to have been an inappropriate appointment.

Financial management

The ECHO contract is for EUR 747,780 (equivalent to CHF 912,293), of which 40% (EUR 300,00) was contributed by ECHO, and the remaining EUR 447,780 was sought from other donors. The budget for the overall grant was developed by the delegation and vetted by the relevant stakeholders, forming part of Single Form. The breakdown of the budget line items has been shared internally: however expenditures initially charged under ECHO activity did not necessarily follow the agreed ECHO budget lines

For example, the contract is specific about expectations relating to staffing, and the review team could not match the expenditures on staff cost to what was agreed in the budget. One of the ECHO budget lines is for an expatriate staff member for 4 months, with 50% allocation of time. The reality is that the delegate responsible was fully funded from another source, and left his post part way through the project: this budget line was used to support senior national programme managers.

Another instance, the ECHO breakdown budget clearly stipulated expenditures under the relief component are solely for cash distributions. The review team found expenditures associated with tarpaulins under this component, but fortunately this was corrected before the project closed. It was unclear whether the field managers consistently made reference to the breakdown of this ECHO budget in making their plans and financial reporting, particularly when this ECHO grant formed part of a larger appeal of CHF1.7Million.

The Appeal Manager for the overall appeal was former Preparedness and Resilience Coordinator Sajit Menon, although there is an inconsistency, as the project manager specific for this ECHO grant (but not the co-funding) was Khaled Masud. Expenditures for the Appeal including for this ECHO grant would still have had to go through Sajit as the Appeal Manager and budget holder, and the inconsistency does not appear to have caused any issues, but it remains unexplained. The Appeal Manager would normally be the HOD.

The majority of the co-funding came from the Hong Kong RC (95%) with amount of CHF 520,005 disbursed in two tranches. The second tranche of the HKRC funding came very late³, in June 2013 was mainly used for cash distribution in the SE.

Resourcing

Despite the strength of the volunteer body, including the highly trained NDRT, the operation was probably understaffed, both from an operational (BDRCS) and technical support (IFRC) perspective. This statement needs some clarification:

On the BDRCS side, the quantity of staff was adequate for the operation as it was planned. Two key people were inappropriately appointed to critical positions (one previously, one as a direct result of the response): once these people were replaced and the NDRT re-deployed, the work was completed quickly.

If the work had been planned in a more robust manner, with a higher level of community participation, and more substantial monitoring, as is appropriate to a recovery programme, then a

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³ From the perspective of the ECHO grant, which required IFRC to find co-funding.

higher level of staffing from BDRCS would have been necessary. BDRCS should seriously consider mechanisms for skilled short-term surge capacity to support ULOs during the response.

On IFRC side, the technical skills were certainly available to the programme at the Dhaka level, but the demands on these individuals were too high, and the programme started at a time of quite disruptive change and turnover within the management of the IFRC delegation. It does not appear that sufficient attention was paid to the programme, especially given the nature of the relationship between IFRC and ECHO.

Timeliness and delays

The cash transfers were delayed, as demonstrated by the expenditure graphs provided in the real-time status report of the delegation. The delays have been attributed to a number of causative factors: it's not possible now to quantify the contribution made by each of them at different times. The process is outlined below in roughly chronological order: see also Annex 3 for a detailed timeline.

There was a month-long gap between the start of the qualifying expenditure period, 1 November 2012, and the announcement that IFRC had been granted funding. IFRC could have started work during this period, or (since the ECHO grant was effectively a contribution to the Appeal) could have started to charge on-going work to the ECHO codes. This did not happen.

When the initial notice of funding came on 11 October 2012 it was reported to imply that the full proposal amount of €400,000 had been granted. ECHO then sent the contract at the end of November: it was signed by ECHO on 29th and by IFRC on 30th November 2012: the amount of the contract was €300,000. BDRCS were formally informed on 6th December. The change in expected amount generated some confusion and uncertainty, and an unnecessary decision appears to have been taken to postpone starting work until the hard pledge was actually received in the system. The pledge is dated 19 December 2012. At this time, 7 weeks had passed from the start of the contractual period, and the benefits of BDRCS' 'head start' over the NGOs had effectively been lost.

The notice from BDRCS to the affected branches explaining the terms of the Federation Appeal was sent on 17th September 2012. A sensitisation visit to the SE took place in the third week of December 2012, and joint BDRCS-IFRC detailed in-field preparations took place from 7th to 18th January 2013: during this time a workshop was held with key staff to explain the programme modalities.

The BDRCS recruitment processes began in January 2013, and the first deployment of NDRT coincided with the preparatory workshop. IFRC staff recruitment began in January 2013.

The Livelihoods Officer (at the coordination level) appears to have misunderstood the nature of his role, and was insisting on having signing authority for the cash transfers: such authority had been delegated to the level below him, the ULO. He appears also to have been working around the proper communication lines, and trying to use influence at HQ to manipulate events. He was removed from his role in the third week of June 2013, but until this time he appears to have had a negative impact on effective programme implementation.

At the Unit level, the ULO in Bandarban had little prior experience of emergency response and was ineffective. Over time, a backlog of administrative matters built up which began to affect the financial flows. A process to re-assign him began in early May 2013, but he tried to use his influence to remain in post: he was eventually replaced in June. During this critical time, very little progress was made in this district.

Meanwhile, within the Federation, staff changes also had a negative impact on the operation. The initial Head of Delegation departed on 31 August 2012, and a substantive replacement was not in country until 5 January 2013: in the interim the responsibility changed six times, alternating between two staff members. The Programme Coordinator left in mid July 2013, and was replaced by an internal appointment in September.

A final factor was the frequent *hartals*, especially from the second week of January to the end of March 2013. Federation security rules do not allow travel during *hartals*, which undermines monitoring and supervision activities, and the local banks do not carry enough float to maintain project operations in the absence of road connections with the towns. For both cash and cheque payments, the rural banks need to call down additional money supply at distribution time, and this was not possible during *hartals*. As well as RC/RC stakeholders, both the ECHO-funded agencies interviewed made the same comments about *hartals*, and indeed both applied for their own no-cost extensions for the programme.

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As noted in the introduction to this section, it is not clear the degree to which each of these factors contributed to the overall delays. However, many of these problems could have been alleviated if there had been a higher level of management attention paid to progress monitoring of progress, and higher priority placed on the operation as a whole.

I. Risk analysis and mitigation

There is no proper risk register in place for the operation. The sections on risk in the POA and the single form are weak.

The systems put in place for the management of the cash transfers themselves are solid and minimise risks. They were designed in 2012 using international expertise and building on work done elsewhere: this was their first real test. See Section H, above.

The two main risk areas in Bangladesh can be considered to be politicisation and corruption. As a part of Bangladeshi civil society, BDRCS is exposed to both these risks.

The work on the cash transfer systems has ensured that corruption risks are minimised, in terms of the correct amounts of money safely reaching the identified beneficiaries.

The risks of politicisation are real and harder to mitigate with confidence. However, the risks are at a fairly low level: around the appointment of staff, for example. There were suggestions from some key informants that this has happened, and there are some unexplained observations, but no evidence was produced. There is no evidence of political influence being an issue in beneficiary selection.

Risk management: PM Khali

The newspaper reports from Cox's Bazar served to add to the levels of concern. BDRCS undertook an investigation, and provided a translation of the report to IFRC, a summary of which was provided to ECHO. This is an unusual act of transparency on the part of BDRCS, and should be commended. However, the report itself is not as substantial as it might have been, and 9 weeks passed between the investigation being launched and an English-language report being available.

The review team can broadly endorse the findings of the BDRCS Investigation. Around 300 people in PM Khali appear to have been swindled out of 4,500-5,000 BDT each, and around 180 of them have had their money refunded following community-level action taken locally. The fraudsters were using the name of BDRCS, but were not connected with BDRCS: none of their reported actions suggest any link with BDRCS or any familiarity with their ways of working. Police action is underway against the fraudsters.

The situation is more complex than this, as the problems appear to have provided a platform for political posturing, which is a norm especially in the run-up to the elections. It seems likely (from key informant interviews and translated press reports) that some BDRCS life members were involved in the problems in PM Khali. However, it is important to make a distinction between the actions of BDRCS members and the actions of the institution at different levels.

The BDRCS Investigation Report makes no mention of a field visit to PM Khali, although the review team understands that such a visit was actually undertaken. The review team visited PM Khali and was greeted by a large crowd of very unhappy people, but it rapidly became clear that they were not upset with BDRCS, but with the swindlers themselves and the slow action against them by the authorities.

The ECHO email of 4 September implies that it is the responsibility of the IFRC/BDRCS to reimburse the swindled money, and states that the BDRCS Unit Secretary has made a commitment to follow this up. This expectation is difficult to justify, since BDRCS was not involved in the swindle and the affected population are not beneficiaries. That said, if there were actions that BDRCS could take, then they would be welcomed by all parties.

Risk management - general

While there is evidence that risk was discussed and mitigation strategies for key risks were put in place, no risk register was developed for the project, and no formal mitigation strategies were documented, aside from what is included in the proposal and the Appeal documents.

It took time for the issues arising in PM Khali to be addressed at a national level, and time for the problems to be shared with stakeholders. This reflects a tendency to try to solve issues at the local level, and again, this can generate concerns about transparency at other levels and with external stakeholders.

There is no consistent model to explain why some beneficiaries received their payment in cash and some by cheque. According to the guidance, the BDRCS standard is to pay in cash, although it was reported that the BDRCS norm is to pay by cheque as it brings better controls. Some factors were certainly applied: for example the distance from a bank, and the cost of the transport. But they were not applied consistently: CFW was generally paid in cash, even when CFT was paid to other members of the same household by cheque. UCGs were generally paid by cheque, except in 2 unions of Bandarban which were more remote. CFW was generally paid on a weekly basis, and the other payments made in a single tranche. There are pros and cons associated with each modality.

Cheque payments require travel to the bank, with associated costs and possibly increased risk to more vulnerable beneficiaries. The costs were typically around 100-300 Taka, which is between 1.25% and 3.75% of the total value of the grant. On the other hand, many of those beneficiaries who purchased durable assets or livelihood assets with their grants would need to make these journeys to access the marketplace in any case. It is probably better to pay UCG in cash in most cases.

From the evidence of the field visits undertaken by the review team, despite the inconsistent choices, there were no inappropriate payment mechanisms adopted. However, it would have been preferable to have a set of SOPs to guide this decision making, that consider security, distance, market factors and beneficiary preferences, and these SOPs should include gender disaggregated responses (in the large majority of cases, the CFW beneficiaries were male and the CFT beneficiaries were female).

Other ECHO partners also used a mixture of cash and cheque payments.

J. Awareness of context and unanticipated impacts: do no harm

As a result of their deep base in the community, BDRCS have a well-developed understanding of the likely impacts of their programmes. However, rather like the risk analysis, it is not explicit or documented, and they have failed to communicate it through the programme proposal or reports.

BDRCS became aware, through the monitoring processes, of a number of unanticipated impacts. For example the positive social impact for some groups of women receiving CFT payment by cheque, which took them into town as a group: they expressed a strong preference for cheque payments even as their CFW husbands preferred their money in cash.

As noted above, those travelling to the bank incurred additional costs. For some, this was inevitable, as the items they wished to purchase were not locally available. For others, local purchase would have been possible, although the price differential is not known (depending on the commodity, the rural marketplace may be cheaper or more expensive). No analysis of typical market prices at rural and district level has been undertaken, so the balance of costs is not known.

In addition, all beneficiaries needed to pay for a photograph for their registration card: perhaps another BDT 100. These two elements could have been factored into the grant amount: easily done, but this was capped by ECHO against BDRCS wishes.

This was the second BDRCS cash transfer programme of any scale⁴, and although technical advice had previously been made available, there was a sense of caution about the way forward. ECHO were strongly advocating that the UCG could be given out at the same time as the CFW, and this was the accepted approach of the other ECHO partners. BDRCS were of the opinion, based on an unwritten Do No Harm analysis, that such a distribution ran the risk of creating tensions between the two groups of beneficiaries. Although events proved these fears to be unfounded, and the decision would have delayed the cash transfers to the most vulnerable groups by a couple of weeks, the BDRCS decision is understandable and even commendable at this stage. Note that this was no longer really an 'early' recovery intervention: the flooding took place in August 2012 and the ECHO decision was

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⁴ IFRC supported a CTP programme in 2007 for 5000 beneficiaries, in response to cyclone Sidr.

announced in November – allowing a couple of months to set up structures, register beneficiaries and begin the CFW projects, a gap of two weeks in no longer really significant.

A further observation on this topic: Every focus group of CFW recipients was asked how they felt about the UCG group receiving a grant without having had to work for it. There was unanimous agreement in all FGD that this was appropriate. This strongly suggests that the targeting of UCG beneficiaries was perceived to have been good, within the communities.

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Conclusions and recommendations

From the most important perspective, that of the beneficiary, the operation was a delayed success. The cash reached appropriate beneficiaries in a safe manner, with only a modest cost to most of them. The review finds that the cash transfers met their objective to strengthen food security in the period after the flooding, and that the training and the physical projects undertaken both had benefit for the affected communities. The amount of the grant was too small to have a more substantial impact on recovery, covering all the sectors identified in the JNA.

Recommendation 1. Where a multi-sectoral needs assessment exists and multiple needs have been identified, then all efforts should be made to generate a multi-sectoral, integrated response such as that described in the Federation Appeal. These efforts should include advocacy with donors on the basis of the common needs assessment.

The design of the operation was generally weak. The Appeal's monitoring framework was poor and standard tools were not used, or not used properly. There is no written context analysis, no market information, and no analysis of particularly vulnerable or marginalised groups. There is no evidence that gender issues were given appropriate attention. Yet the Appeal design process was led by an experienced delegate, and the ECHO proposal went through multiple round of revision, and had access to technical support from KL, where it was finally approved internally and submitted to ECHO.

The Federation has a reasonably good set of tools available in the Appeal, the Plan of Action, guidance on M&E and the Recovery Guidance. All of these tools should have been applied, and applied properly, to the design of this operation as a matter of course. After the relief activities, there was plenty of time prior to the submission of the ECHO proposal to do this, and yet more time to improve them before recovery activities really took off.

If a weak proposal is accepted with an insubstantial baseline, incomplete indicators and poor analysis, all parties must take some responsibility for the reporting, which will inevitably be below standard as a consequence. While every effort should be made to provide a high quality, transparent and timely final report to ECHO, there will be practical limitations in terms of data availability.

Recommendation 2. The role of the IFRC delegation in emergency response should be to ensure that the response plans, articulated through the POA, meet certain minimum standards. The POA should include context analysis including possible scenarios and associated risk mapping, relevant market analysis, a detailed gender perspective, and the inclusion of effective mechanisms for beneficiary communications. It must include a complete and proper monitoring framework with fully defined indicators and meaningful supporting information.

Recommendation 3. IFRC should have and use a scored checklist for POA approval, which ensures that Appeals meet the minimum standards outlined above. While such a checklist may have different thresholds for work done in the immediate aftermath of a disaster, it should be fully applied to medium-term early recovery activities. Responsibility for this should be held by the DMU in KL, and the PMER department should also sign off on each plan.

Recommendation 4. BDRCS should review the cash tools developed in 2012 and ensure that the full toolkit, including annexes, has been translated into Bangla and that the NDRT members and relevant staff have all been trained in its application.

The working relationship between IFRC and BDRCS appears to have shifted over recent years, with an increased emphasis on direct operational support, rather than technical support to an operational partner. The root causes of this shift and a consideration of ways in which it might be addressed are both beyond the immediate scope of these TOR, but the relationship itself is an essential factor in the performance issues and is a proper area for inclusion.

In essence, IFRC could be considered to be working in the manner often adopted by partner national societies, rather than focussing on development of capacity and support to institutional change. It's worth observing that the MOU is very clear about the appropriate roles and responsibilities, but that the reality on the ground appears to be more operational.

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This is being encouraged by some donor attitudes calling for higher levels of staffing and oversight. Comparisons by these donors to the structure and working practices of INGOs are not helpful in this regard: the operating models and legal base of BDRCS are simply not comparable with INGOs.

The delegation seems to be stretched: requests for information or simple administrative processes can take substantial time to be addressed. Proactive communication or provision of resources is not the norm: for example, neither the relief manual nor the draft cash-specific SOPs were shared with the review team, and information on HR changes was not forthcoming despite requests.

Assuming that this shift in focus were to be corrected in the near future, it's not clear that the IFRC delegation has the right structure to meet the revised purpose, or that the current staff have the correct mix of competencies to deliver the appropriate types of support.

Recommendation 5. The delegation would benefit from a high level review of its purpose, structure and staffing, and its working practices, to ensure complementarity and compliance with the pre-disaster agreement. The review should also consider IFRCS's relationships with BDRCS, ICRC and the PNS, to identify potential points of fracture and address them in a proactive manner. It should then consider appropriate staffing levels, in terms of numbers of staff and competencies, to meet the expectations.

IFRC salaries are reportedly much higher than BDRCS, which makes it easier for IFRC to recruit high quality staff. This can result in IFRC staff with much higher capacity and wider experience than their BDRCS counterparts; joint operations in the field may then cede decision making to IFRC and undermine rather than build capacity. The disparity is certainly a source of tension, and the recent salary increase for IFRC staff, undertaken with no equivalent change immediately on the table for BDRCS, have worsened this situation.

Through the process there has been insufficient attention paid to the operation by the management teams in both BDRCS and IFRC. This began with the poor proposal development and continued into implementation. Despite the weaknesses in the monitoring framework, there were concrete indicators that things were not going to plan as early as February 2013, but these were not given much attention.

It seems to have been clearly understood within IFRC, that because of the history, performance against this contract was important – even more so than usual – for the overall relationship between IFRC and ECHO, and it should be closely observed. This understanding did not lead to sufficiently high levels of oversight and management, however. This issue was compounded by weak documentation and poor communication between the various levels within the operation from field to HQ.

Recommendation 6. The Bangladesh delegation should develop an internal tool for management reporting on programme implementation. This should be combined with strengthened monitoring within BDRCS and IFRC that includes indicators for **internal processes**; changes in **context and risks**; and **results** for the affected population at the output and outcome levels all included. This tool should then be tested by application to existing programmes, and revised until it is fully fit for purpose.

Communication has been weak throughout much of the implementation period, although it has improved recently after the programme started to attract external scrutiny. Notwithstanding the poor baseline and monitoring tools, the reporting has been weak: ambiguous sometimes to the point of appearing evasive. Communication has largely been reduced to formal reporting, with missed opportunities to engage with stakeholders, donors, partners and colleagues in KL.

The reporting itself contains mixed messages on key issues such as the selection of target areas, processes for beneficiary selection, and coordination with the local authorities: messages that were not really clarified during monitoring visits by donors. It may be that the processes are not as clear as they might be, or not universally understood, or it may be just poor communication. Formal reporting passes through technical review in KL, but this did not resolve the issue.

In addition to the strengthened tools recommended above, work needs to be done on improving the frequency and quality of communication from the delegation (and by implication, from BDRCS). This needs to be substantial and consistent. In the short term, however, the final report to ECHO must be prioritised in terms of time and quality.

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Recommendation 7. An accelerated timeline for the ECHO final report is already in place, and it should be followed. It is critical that the final report is transparent, open, and unambiguous, and that it is delivered on time. The concerns of the ECHO team are well understood and well documented: they should form a checklist for the final report and must be addressed.

Recommendation 8. Formal reporting should always be complemented by informal information sharing and discussion. This strengthens relationships, builds confidence, and provides an opportunity for advocacy, as well as an opportunity to strengthen donors' understanding of the RC/RC Movement.

Recommendation 9. The delegation and BDRCS should jointly consider undertaking a statistically representative impact survey of beneficiaries, using a retrospective baseline. The process would require technical inputs and a budget, but it might provide valuable evidence of impact should the programme be subject to future audit and be found wanting.

While the ECHO supported project is closed and the reporting almost finished, the work begun in the 'lessons learned' workshop is incomplete. If the momentum is lost now, the effort will have been in vain and the opportunity to learn lessons will be missed. The IFRC leadership should work closely with BDRCS to conclude these processes, and may choose to share some of the outcomes later with ECHO as a further contribution to improved transparency and mutual understanding.

The pre-disaster meeting will provide one opportunity to progress this discussion, but it will also need additional resources, time and people, over the following weeks.

Recommendation 10. On-going work to strengthen recruitment practices within BDRCS is critical to effective risk management and should be prioritised. Decentralisation of hiring decisions, stronger HR processes, a competency framework, appraisal systems, and a review of remuneration are all options. BDRCS should also consider ways to strengthen staffing at the Unit level for short periods of time during emergency responses.

Recommendation 11. The risk analysis exercise undertaken at the end of the workshop is incomplete. Risk owners should take the lead in reviewing the matrix: the locations of the existing risks should be revisited and additional elements should be included. The final exercise needs to be completed for each of the identified risks, and a set of actions developed to include the identified milestones. The outcomes of this exercise should be presented to the stakeholders, and progress against the milestones needs to be monitored.

Recommendation 12. IFRC and BDRCS should develop a management response to issues arising in this report and the recommendations – and those of other reviews. Where recommendations are accepted in whole or in part, an action plan must be developed, and it should be subject to regular monitoring and the management be held accountable to it.

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Annex 1: Terms of Reference

Bangladesh Floods and Landslide Appeal (August 2012)

Cash Transfer Project Review

Background:

The International Federation of the Red Cross and Red Crescent Societies (the Federation), with the request from Bangladesh Red Crescent Society (BDRCS), launched an Emergency Appeal for Bangladesh Floods and Landslides on August 2012 (Appeal number: MDRBD010) which incorporates a DREF and its extension which was launched a month before on July 2012. The appeal amounts to CHF 1,753,139 targeting 9,500 families with a timeframe of 10 months. Due to operational needs, the timeframe was extended by 2 months to 30 September 2013.

The Emergency Appeal operation includes relief distribution, Shelter, WASH, Emergency health and care, livelihood as well as recovery activities. Within the modalities to achieve each components' objective, the cash based intervention was approximately one-third of the total programme. It aimed at having a longer-term impact in improving the livelihood of the affected families. It is obvious that an operation that involves cash distribution requires transparency, rigorous systems, and skilled manpower in managing it.

The cash based intervention received earmarked funding from donors such as DG ECHO and matching funds from multi donors. During the implementation, in three southeast districts: Cox's Bazar, Bandarban and Chittagong. DG ECHO, on 19 March 2013, after receiving IFRC first interim report, raised concerns on the unsatisfactory project performance by BDRCS/IFRC. Two months later there were allegations of misuse of funds against BDRCS, which were reported by local newspapers. Following the allegations, BDRCS conducted an internal investigation and produced a report that was shared with IFRC. In parallel to the BDRCS investigation, IFRC produced a Real time Status Report, which chronologically documented activity progress, HR level of involvement, challenges and management actions to overcome those challenges. The cash based intervention project completed before the project deadline date on 30 June 2013

Purpose

This review is an internal evaluation jointly conducted by IFRC and BDRCS, with the facilitation by an external consultant. It aims as a lesson learnt process and serve as the guiding posts for future cash based intervention projects in Bangladesh, and perhaps in other regions and beyond.

The review, including a lesson learnt workshop, will examine **two key areas** in the cash transfer (cash for work, cash for training and unconditional cash grant) programming, which presented specific challenges during the implementation. The two areas as follow:

Project delivery: cash based project design which, includes beneficiary selection and verification; engagement of RC volunteers), stakeholders agreement (inside and outside of the BDRCS and IFRC), fund transfer and reimbursement system (between BDRCS and IFRC), cash disbursement mechanisms, transparency and accountability (using appropriate financial systems); and

Overall project management: monitoring and reporting, adequate supervision and risk mitigation, roles and responsibilities (are defined and understood by all stakeholders), coordination with relevant actors including DG ECHO other partners and overall leadership and responsibility to deliver the project.

In examining the project delivery, attention will be given to the alignment of the result areas in the Emergency Appeal with the Key Performance Indicators (KPI) as reported to donors, particularly in the DG ECHO proposal, and other donors requirement as applicable.

The review will provide specific recommendations on how work areas and accountability systems can be strengthened to support current and future emergency responses particularly cash based programming delivered in partnership with BDRCS.

Key programme review questions:

This programme review will seek to address the questions and lines of enquiry outlined below.

Specific review areas and questions to address	Suggested Method	
Were the key performance indicators (KPI) agreed with donors (e.g. DG ECHO) fully understood by the Federation and BDRCS as implementing partners?	Review of proposals, monitoring systems, progress reports, staff dialogue, operational agreement between IFRC & BDRCS	
Were leadership roles and responsibilities clearly defined and understood by all stakeholders? Did the leadership provide adequate communication to donors?	Programme guidelines and SOPs, project documentation, individual interviews, operational agreement between IFRC & BDRCS	
Were the decision making processes clear and followed through? For example documentation of meetings outcomes with partners in Dhaka and in the field ?	Project and meeting documentation on file	
Were the reporting lines followed between the field, the Federation / BDRCS?	Project correspondence, individual interviews	
How timely and accurate were the reporting, information management and risk mitigation during the implementation, and how could this would have been improved?	Construct reporting timeline and deadlines met. Individual interviews	
Were the level of monitoring by the Federation Delegation and BDRCS adequate? What else could have been done to make the level of monitoring and supervision effective?	Review systems and performance. Compare current with for this and other operations	
Confirm expenditures charged are within agreed budget lines and timeframe.	Financial reports against budgets and staff dialogue	
Assess the effectiveness and functionality of BDRCS and Federation in project management (project delivery, reporting, capacity of BDRCS volunteers, etc.). How can the identified challenges be addressed in the future?	Availability, staff awareness and compliance with procedures, discussions and observations	
On program design:	Review of current support provided and	
Any challenges for coordinated proposal submission to DG-ECHO following an inter-agency Joint Need Assessment	Review specific questions raised on gender and protection risks (sufficient focus on elderly, FHHs	
Any delays in the start-up of cash transfer activities? If yes, why?		
The timing of cash disbursements, would disburse all grants simultaneously a better approach and if yes, the reason for it is not followed	etc.)	
The appropriateness of disbursement mechanisms for CfW, CfT and UCG ⁵ and the reasons for this. Are these mechanisms similar to or different from DG ECHO or other partners.		
Similarities or dissimilarities of IFRC financing system for cash disbursement with DG-ECHO requirement.		
Any issues of duplication of work areas with other agencies. If yes, how these duplication could be avoided.		
The reasons and justification for the high percentage of UCG (50%) and if numbers were over estimated		
Specific issues or constraints related to gender balance		
Were beneficiary selection and verification processes transparent and fair and documentation (including beneficiary lists) adequate? How can these be strengthened?	Review of project documentation and staff and donor and DG ECHO other partners interviews	
Were disbursement mechanisms appropriate in terms of efficiency and accessibility. Did they meet beneficiary needs and constraints?	Review guidance and its application in the field. Field discussions with beneficiaries, RC branches & other stakeholders. Identify challenges and steps	

 $^{^{\}rm 5}$ CfW (Cash for Work) ; CfT (Cash for Training) ' UCG (Unconditional cash grant)

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to mitigate

Proposed methodology:

The review will follow lines of examination looking at both the delivery of field activities and the broader management and supervision of the operation. The outputs will further clarify issues and challenges related to programme delivery assisting both donor reporting and further strengthening programme management and procedures supporting current and future operations. This review will also discuss broader areas of operational management with the view of strengthening them.

The review will utilise existing documentation, communication and internal and external reports (including the investigation report from BDRCS and Real Time Status report by IFRC Bangladesh delegation). Such documentation will be prepared by the country delegation and made available to the review team in advance. This will be supplemented through key informant interviews with the beneficiaries, Federation and BDRCS staff and discussions with stakeholders (e.g. donors) as appropriate. Where needed, the Review Team could suggest other means of gathering information to satisfy the review.

A lesson learnt workshop will be conducted as part of the review with the participation of major stakeholders such as BDRCS, the Federation and DG ECHO representatives.

Review Team composition:

External consultant – team leader and, responsible for producing the report with the inputs from team members, technical review of the cash transfer program and overall program management and will facilitate the lessons learned workshop.

Representative from the Risk Management and Audit team OR a team member with audit background - responsible for analysis of financial systems and reports, and determination of the causes of irregularities if these become apparent.

Representative for IFRC Zone operations - responsible for review of SOPs, systems and procedures of the delegation and the BDRCS, and the relationships between internal stakeholders.

A representative appointed by the senior management of BDRCS and a representative from country delegation-responsible in revisiting BDRCS and IFRC roles and responsibilities in the implementation of the project.

Activity	Est days
Identification and appointment of consultant/s and the team member to undertake this programme review.	N/A
AP zone briefing, documentation review, confirmation of ToR and agreed outputs. Consultant/team develop an agreed work plan and timeframe including?	2
In-country visit , BDRCS, IFRC and DG ECHO and project sites as well as document review. (Field visit to be confirmed)*	7
Compilation and analysis of findings, debriefing BDRCS and IFRC, and facilitating of lesson learnt workshop	3
Debriefing AP zone	1
Submission of the first draft of the review and lessons learnt	2
Submission of Final version of the two reports)	2
Travel days from home base to Kuala Lumpur and return	2
Total	19

^{*}If trip to Bangladesh and/or local field work is postponed due to external factors beyond control (e.g. local strikes), both parties will first identify alternative periods under mutual consensus, or to revise the number of contract dates when no alternative could be identified and agreed upon.

Outputs:

Project Management Report: Observations, findings and recommendations to strengthen operational management and programming utilising cash transfer modality, associated with the key review questions. (max. 15 pages)

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Project Delivery Report, with results from the lessons learned workshop (max. 5 pages)

Audiences and the use of the outputs:

As a lesson learnt process, the main targeted audience of the Project Review Report will be BDRCS, the Federation and Red Cross/Red Crescent implementation partners which have contributed to the SE Recovery Project. The Project Delivery Report would be shared more widely with BDRCS partners and possibly published on the web

These two reports will also provide answers to the technical questions raised by donors /partners that are involved and/or contributed to the cash transfer programming in Bangladesh.

Management:

The AP zone Head of Operations manages and is responsible for this programme review with support from the APDMU.

Timeline:

Briefing & debriefing in Kuala Lumpur, in-country work in Bangladesh is tentatively on 3rd & 4th week of August, 2013. Final reports to be submitted by 18 September 2013 unless further agreed by all parties.

Annex 2: linking the TOR to the framework

Programme review questions from the TOR	Framework areas
Were the key performance indicators (KPI) agreed with donors (e.g. DG ECHO) fully understood by the Federation and BDRCS as implementing partners?	H. Appropriate management structures, processes and systems. G. Effective monitoring for programme management and reporting.
Were leadership roles and responsibilities clearly defined and understood by all stakeholders? Did the leadership provide adequate communication to donors?	D. Engagement with external stakeholders. H. Appropriate management structures, processes and systems.
Were the decision-making processes clear and followed through? For example documentation of meetings outcomes with partners in Dhaka and in the field?	H. Appropriate management structures, processes and systems.
Were the reporting lines followed between the field, the Federation / BDRCS ?	H. Appropriate management structures, processes and systems.
How timely and accurate were the reporting, information management and risk mitigation during the implementation, and how could this would have been improved?	G. Effective monitoring for programme management and reporting. I. Risk analysis and mitigation.
Were the level of monitoring by the Federation Delegation and BDRCS adequate? What else could have been done to make the level of monitoring and supervision effective?	H. Appropriate management structures, processes and systems. G. Effective monitoring for programme management and reporting.
Confirm expenditures charged are within agreed budget lines and timeframe.	H. Appropriate management structures, processes and systems.
Assess the effectiveness and functionality of BDRCS and Federation in project management (project delivery, reporting, capacity of BDRCS volunteers, etc.). How can the identified challenges be addressed in the future?	H. Appropriate management structures, processes and systems.
Any challenges for coordinated proposal submission to DG- ECHO following an inter-agency Joint Need Assessment	C. Coordination to ensure consistent response across the whole affected area. D. Engagement with external stakeholders.
Any delays in the start-up of cash transfer activities? If yes, why?	H. Appropriate management structures, processes and systems.
The timing of cash disbursements, would disburse all grants simultaneously a better approach and if yes, the reason for it is not followed	H. Appropriate management structures, processes and systems. J. Awareness of context and unanticipated impacts: do no harm.
The appropriateness of disbursement mechanisms for CfW, CfT and UCG and the reasons for this. Are these mechanisms similar to or different from DG ECHO or other partners.	H. Appropriate management structures, processes and systems. J. Awareness of context and unanticipated impacts: do no harm.
Similarities or dissimilarities of IFRC financing system for cash disbursement with DG-ECHO requirement.	C. Coordination to ensure consistent response across the whole affected area. D. Engagement with external stakeholders. H. Appropriate management structures, processes and systems.

Programme review questions from the TOR	Framework areas
Any issues of duplication of work areas with other agencies. If yes, how these duplication could be avoided.	B. Agreement on humanitarian and recovery needs arising from the flooding C. Coordination to ensure consistent response across the whole affected area.
The reasons and justification for the high percentage of UCG (50%) and if numbers were over estimated	H. Appropriate management structures, processes and systems.
Specific issues or constraints related to gender balance	E. Gender perspective applied to programming
Were beneficiary selection and verification processes transparent and fair and documentation (including beneficiary lists) adequate? How can these be strengthened?	A. Beneficiary experience. F. Inclusion, participation, communication and feedback mechanisms
Were disbursement mechanisms appropriate in terms of efficiency and accessibility. Did they meet beneficiary needs and constraints?	A. Beneficiary experience. H. Appropriate management structures, processes and systems. I. Risk analysis and mitigation

Annex 3: the operation timeline

Late June	Unit level responses begin
02 Jul 12	Appeal MDRBD010 Bangladesh Floods & Landslide registered in IFRC APPLE system. Sajit Menon as Appeal Manager (for the overall appeal) & Project Manager specifically for PBD021 (Flash Floods and Landslides)
04 Jul 12	DREF request for CHF 241,041 approved
July	POA was drafted between July and launch of the EA for CHF1.7m.
7 Aug 12	HOD vacancy advertised
8 Aug 12	Emergency Appeal launched CHF 1,753,139
	First mention of the tripartite agreement in support of the POA – see Oct 17 th .
August	Joint needs assessment undertaken in the SE – the report is undated
31 Aug 12	IFRC HOD Udaya Regmi completes his mission.
1 Sept 12	Sajit Menon is acting HOD to 8 Sept
4 -7 Sept 12	ECHO & IFRC joint assessment with BDRCS to validate JNA findings
9 Sep 12	Joseph Muyambo is acting HOD to 14 Sept
15 Sep 12	Sajit Menon is acting HOD to 23 Sept
20 Sep 12	Ops Update #1
	At this stage, the appeal was only 39% covered in cash and kind, 67% contributions in the pipeline
24 Sep 12	Joseph Muyambo is acting HOD to 11 Nov
30 Sep 12	First ECHO proposal submitted
11 Oct 12	ECHO request for better indicators and shorter timeframe
17 Oct 12	Pre-disaster agreement signed.
19 Oct 12	Hong Kong RC pledged (M1210090) HKD2.5 million (CHF302,273.21) earmarked for cash distribution BDT10,000 to 1000 men and BDT10,000 and training to 1000 women
	Submission of revised version single form as per the ECHO suggestion
	ECHO request for lower amount overall amount
22 Oct 12	Positive response from IFRC to ECHO request for lower amount
1 Nov 12	Start date for ECHO action
	Funding decision communicated EUR
12 Nov 13	Sajit Menon acting HOD to 13 Dec
15 Nov 12	Ops Update #2
16 Nov 12	Hong Kong RC pledge of CHF302,273.21 received and captured in APPLE system
6 Dec 12	Memo to BDRCS confirming contribution and actions
	Recovery assessment for the N - undated
14 Dec 12	Joseph Muyambo acting HOD to 4 Jan
19 Dec 12	ECHO Cash Pledge registered in IFRC system
	Khaled Masud as ECHO Pledge Manager. However, Sajit Menon was the Budget Holder for the overall program and the Pledge Manager for other pledges (HKRC, British RC).
3rd week Dec 12	Sensitisation visit Cox's Bazar branch raise issues about targeted locations

1st week Jan 13	Staff recruitment begins, BDRCS and IFRC
5 Jan 13	Tsehayou Seyoum starts mission as HOD
7-18 Jan 13	Joint team visit and briefing sessions with 1st NDRT deployment
10 Jan 13	IFRC hosted ECHO partners meeting in Bandarban
14 Jan 13	First ECHO transfer EUR 240,000 equivalent to CHF 290,030
20 Jan 13	Cash for training TOT consultant recruitment process started
31 Jan 13	Expenditures @ Jan 2013 reported in Finance system for ECHO coded activities (A0301) amounted to only CHF 12,307 $$
	Types of expenses in Jan: Flood monitoring & beneficiary selection (84%) and salary support to 3 local staff.
14 Feb 13	Other ECHO partner agencies requesting no cost extension on grounds of permits
3rd week Feb 13	CFW schemes selection started and 770 beneficiaries started CFW Employment of livelihood officer
4th week Feb 13	Consultant recruitment for CFT manual
28 Feb 13	IFRC sent official modification request (MR) to DG ECHO for two- month with no costs extension due to security concerns and remote locations
	Expenditures @ Feb 2013 reported in Finance system for ECHO coded activities (A0301) amounted to CHF 1,463 (overall Jan & Feb: CHF 13,770)
	Types of expenses in Feb: Flood monitoring in Cox Bazar, but mainly for salary support for 2 staff (78%)
11 March 13	Ops Update #3
15 March 13	1st Intermediate report covering up to 31 January 2013.
18 March 13	CFT ToT with volunteers 2 days
19 March 13	ECHO raise concerns about poor performance
20 March 13	Community level CFT started Communication to all partners, singling out IFRC
27 March 13	No cost extension and report both rejected by ECHO
29 March 13	IFRC response to ECHO's mail on interim report and modification report
30 March 13	Expenditures @ March 2013 reported in Finance system for ECHO coded activities (A0301) amounted to CHF 12,307 (overall Jan-March: CHF 26,077).
	Types of expenses in March: Flood monitoring in Cox Bazar & early recovery monitoring (22%), salary support for 4 staff (28%), consultant fees (15%), working advances, medical expenses & travels
3rd April 13	Temporary suspension of work in Bandarban as the ULO was transferred.
4 April 13	IFRC submitted second modification request (MR) to DG ECHO
8 April 13	No cost extension agreed by email
4th week of April 13	ECHO mission visit in project area Took part in sharing workshop
18 April 13	The first CFW Chittagong & Cox Bazar recorded in IFRC finance reporting system
	Reference WANS4976 to the Finance System
30 April 13	No cost extension 2 months formal notice
	Expenditures @Apr 2013 reported in Finance system for ECHO coded activities (A0301) amounted to CHF 137,085. (overall Jan-Apr: CHF 163,162)
	Types of expenses in April: CFW Chittagong, Cox Bazar, Bandarban & CFT (84%), monitoring (3%) salary support 5 local staff(2%), consultant fees (1%), vehicle & fuel
1st week May 13	Signing authority given to Livelihoods Officer
	Backlog, problems with W/A

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14 May 13	BDRCS investigation begins (to 10 June)
3rd week May	Disagreements in newspapers between CB and LO
2nd week May 13	ULO re-positioning in Bandarban and work started again in Bandarban
3rd week May 13	Reshuffle in BDRCS directors
30 May 13	Expenditures @May 2013 reported in Finance system for ECHO coded activities (A0301) amounted to CHF 23,390. (overall Jan-May: CHF 186,552)
	Types of expenses in May: computers & equipment (21%), monitoring (12%) salary support 6 local staff (13%), vehicle & fuel
3 June 13	2nd Intermediate report covering up to 30 April. Exp 18%
6 June 13	Cox's Bazar hub moved to to Naikhanchori Upazila
	Ops Update #4; deployed 4 trained staff
	Deployed 14 staff from NHQ
10 June 13	BDRCS Investigation concludes
12 June 13	New ULO joined in Bandarban and the old ULO transferred
23 Jun 13	Meeting ECHO IFRC Dhaka (Masud)
23 Jun 13	Received confirmation of matching fund from HKRCHKRC has provided additional CHF 217,730 to cover the shortfall in SE cash based programme
last week June 13	ECHO mission visit in project area
30 Jun 13	All the activities and cash disbursement completed.
	Expenditures @June 2013 reported in Finance system for ECHO coded activities (A0301) amounted to CHF 243,974. (overall Jan-June: CHF 430,526)
	Types of expenses in June: CFW,CFT, UCG Chittagong,Cox Bazar, Bandarban (84%), monitoring (8%), consultant fees (1%), vehicle & fuel & PSR
5 Jul 13	Email from ECHO - concerns on reporting delays and poor implementation
14 Jul 13	Investigation report translated and delivered to IFRC
16 Jul 13	Sajit Menon finishes his mission
	Khaled Masud took over from Sajit as Project Manager for PBD021 Flash Floods & Landslides
	Latiusliues
17 Jul 13	Real time status report shared with ECHO
17 Jul 13 18 Jul 13	
	Real time status report shared with ECHO