



# CONDITIONAL CASH TRANSFERS IN LATIN AMERICA

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AND ACCOUNTABILITY

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This document was written by Jacopo Gamba with supervision by Zoë Reiter and editorial review by the TI Secretariat.

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<sup>1</sup> When the project was implemented, there was a national contact of Transparency International in Bolivia. The organisation is no longer part of the network, since mid-2013.

# EXECUTIVE SUMMARY

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In Latin America, Conditional Cash Transfer Programmes (CCTPs) have become the predominant public policy approach in the fight against poverty and inequality. By providing cash transfers to (usually female) heads of household of poor and extremely poor families, based on conditions that require the household to seek particular health and education services, these programmes not only seek to improve living standards in the short term. In the long term, they also strengthen the capacity of households to pursue sustainable livelihood strategies and to break the intergenerational transmission of poverty. CCTPs involve billions of dollars and reach more than 20 per cent of Latin America's poorest people. Given these massive financial flows through the state and the economic vulnerability of their intended beneficiaries, it is essential that these programmes incorporate effective mechanisms for transparency, accountability and participation. Such mechanisms help minimise the number of households in need from being wrongfully excluded from programme rolls, discourage clientelism and abuse of programmes for political and private gain by state actors, and strengthen the potential of the programmes to reach their objectives and most effectively serve their intended beneficiaries.

Thus, evidence-based findings and recommendations in this report stem from this urgent need to ensure the highest level of integrity in CCTPs and other large scale social investment programmes. The findings and recommendations presented in this report are based on the participatory assessments carried out in seven countries in the region, between 2008 and 2014, involving more than 14,000 beneficiaries, 700 public officials and many civil society organisations. The assessments cover seven cash transfer programmes, whose total purse is approximately US\$4 billion over the surveyed years.

Integrity is understood as the programme's capacity to prevent any deviations from intended use and any changes in the designated beneficiaries, whether these result from exclusion errors, clientelism or abuse of power for personal gain. In order to identify weaknesses in the integrity of CCTPs, we assessed two aspects of a CCTP: 1) the transparency, accountability and control mechanisms of each programme component; and 2) the capacity and effectiveness of human, financial and technical resources applied to the programme to ensure its effective oversight. Building on the results of our assessment stage, we have worked with those responsible for both the design and implementation of CCTPs in order to mitigate risks to integrity of the programmes based on constructive and detailed recommendations and dialogue.

## FINDINGS

It is important to keep in mind that the purpose of these programmes is to mitigate extreme poverty, and there can be little doubt that this goal is being vigorously pursued. It is noteworthy that many programmes have established social accountability mechanisms in at least some stages, in addition to adopting effective rules governing access to programme information. However, as illustrated by this report, despite efforts to alleviate poverty, there are vulnerabilities in nearly all the programmes examined, which could open the door to corrupt and clientelistic behaviour – hitting the poor the hardest. These include, for example:

- inadequate integrity levels of some components of CCTPs, especially targeting and inclusion that create risk conditions favouring corrupt and/or clientelistic behaviours or acts.
- few processes, including outreach, take into account cultural, linguistic and gender concerns.
- absence of a robust and functional system for handling beneficiary and citizen complaints and requests for information

In what follows, our analysis will be explained in more detail in such a way as to develop an understanding, for each participating country, of the risks identified in each programme.

## GENERAL RECOMMENDATIONS

As will be explained in greater depth throughout this document, Transparency International makes the following recommendations:

- **Strengthening the mechanisms for social audits and oversight**

There is a need to improve the spaces for dialogue and consensus-building between programme beneficiaries and programme officials, for example the annual meetings of beneficiaries. These meetings, for example, should comply with the minimum public accountability requirements established by most national regulatory frameworks.

Accountability processes within the programmes should be the subject of ongoing development and improvement and the programmes should be communicated to target populations in ways that are appropriate to the latter's interests, expectations, formal education level, cultural background and gender.

- **Strengthen institutional management of and mechanisms for beneficiary engagement, including the receipt and management of beneficiary claims and complaints**

Formal grievance and complaint mechanisms need to be improved to better engage, manage and effectively respond to complaints. This involves creating effective communication channels between beneficiaries and independent control bodies, including local citizen oversight mechanisms, as well as strengthening the capacity of oversight bodies to handle grievances and complaints – including the capacity to deal with human rights, ethnicity and gender issues.

CCTPs should look to incorporate accessibility and adaptability mechanisms that facilitate the inclusion of vulnerable populations, as well as the non-discriminatory participation of different ethnic, linguistic, gender and social groups.

- **Prevent political abuse of programmes during electoral seasons**

Civil society organisations should be more active in their efforts to document, and draw the attention of oversight bodies to, the risks of political abuse of social programmes during election season and should propose alternative strategies for improving the efficacy of control mechanisms. Electoral candidates and political parties should be educated regarding the importance of exposing risks and potential abuses to voters.

# INTRODUCTION

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In the late 1990s Latin American countries – starting with Mexico and Brazil – began to adopt CCTPs. These programmes are designed to identify households facing extreme poverty and to deliver cash payments directly to them, in exchange for their compliance with health and education-related ‘co-responsibilities’, such as sending their children to school and following vaccination schedules and other public health measures. In so doing, the programmes seek to accomplish two primary objectives: to prevent future poverty by increasing human capital, and to alleviate present poverty, via cash transfers.

With the size of their target populations, their budget and their outcomes, these programmes have played an increasingly important role in public policy on tackling poverty and they have been adjusted and amended to respond more adequately to the expectations of vulnerable beneficiary populations.

Since their inception, such programmes have been designed to serve large populations. In 2010, they covered 19 per cent of the regional population (113 million individuals), representing the poorest and most excluded sectors, with an investment equivalent to 0.40 per cent of the regional GDP.<sup>2</sup>

A constant of these programmes has been the need to address their impact. Dozens of CCTP assessments confirm that, in terms of strengthening human capital and alleviating poverty, the programmes have had positive results in various areas. In Mexico and Brazil it is estimated that, via CCTPs, conditions have been improved for over 80 million people living in poverty, and that rates of access to healthcare and the education system have also increased. The collection of evidence regarding positive impacts has been hugely important, both in relation to the renewal of existing programmes and for the promotion of similar programmes in other developing countries.<sup>3</sup>

Given their scale, reach and importance for the lives of millions of the most vulnerable and disadvantaged families, these programmes must, in both their design and operation, be capable of eliminating all **margin for the abuse of power by local and/or national actors acting in pursuit of party-political or personal gains**. Without adequate oversight and control mechanisms, the poorest citizens are at risk of discrimination when seeking to access these programmes and receive benefit payments, and the positive impact of such programmes can be undermined.

Also, in view of the unfortunate history of exclusion in these countries, especially associated with decision-making in a whole range of programmes and policies, it is vital that beneficiaries – actual and potential – can easily access public information, protect themselves from abuse and claim their rights.

For these reasons from the beginning CCTPs have been designed to include transparency and accountability mechanisms. Such mechanisms, if properly designed and implemented, **help reduce exclusion errors, prevent clientelism and abuse of power, and strengthen programme effectiveness**. However, **there have been relatively few independent efforts to develop methodologies that: 1) increase our understanding of whether such mechanisms are truly**

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<sup>2</sup> Cecchini Simone and Aldo Madariaga, *Programas de Transferencias Condicionadas. Balance de la experiencia reciente en América Latina y el Caribe* (Santiago: ECLAC; ASDI, 2011), p. 107.

<sup>3</sup> “Conditional Cash Transfers, Reducing Present and Future Poverty”, *World Bank*, 2009.

**effective and adequate, and 2) devise evidence-based strategies for improving such mechanisms, which recognise and incorporate existing good practices.**

Recognising the importance of these programmes in improving living standards among the most vulnerable sectors in the region since 2008 Transparency International has been working to fill the gap described above by developing such a methodology for use by civil society organisations. This methodology seeks to ensure that, both in theory and in practice, the mechanisms for meaningful transparency, accountability and control are effectively applied so that benefit payments reach those entitled to receive them without discrimination, and so that abuses of power are prevented.<sup>4</sup>

After an initial pilot stage (EELA I) in three countries (Bolivia, Guatemala and Peru), which enabled a methodology to be developed and tested, the implementation of the **EELA II: Strengthened transparency and accountability of CCTPs** project began in 2012. As well as providing an opportunity to bring a tested and improved methodology to an increased total of seven countries (including Argentina, Colombia, the Dominican Republic and Honduras), the overarching goal of this second stage of work has been to build capacity for civil society to implement evidence-based advocacy to improve the integrity of the CCTPs assessed.

The methodology used has generated a series of qualitative findings concerning the strengths and weaknesses identified in each programme that was analysed, in terms of integrity mechanisms as well as the level and quality of resources available for effective implementation of those mechanisms and oversight functions (what we refer to as integrity performance). Such findings have been validated by programme stakeholders and participants (officials, beneficiary focus groups and other interested parties), and have established a set of recommendations to strengthen the programmes' transparency, accountability and control mechanisms, including social accountability mechanisms.

This document summarises the most significant results identified in the first year and a half of implementation of the EELA II. In so doing it seeks to stress the similarities and differences in the work of participating chapters of Transparency International<sup>5</sup>. The analysis draws on the following principal sources: information gathered by the coordination team at the Transparency International Secretariat, with the help of monitoring and assessment experts (ZIGLA Consultores); the tables and reports produced by the chapters; and several interviews with EELA's national coordinators. .

The content of this document is intended to support the advocacy stage, for which some general milestones have already been defined. The essential aim of this stage is to **strengthen the development and effectiveness of accountability, transparency and control (horizontal and vertical) mechanisms** of CCTPs in the region over the long term.

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<sup>4</sup> <http://blogs.worldbank.org/governance/rights-accountability-and-social-programs>. Blog published by Ariel Fiszbein, 5 September 2011.

<sup>5</sup> These are independent organisations created at the local level which decide to support the fight against corruption in their countries, following the policies of Transparency International.



An assumption made in the design of the project methodology was that measuring levels of both **horizontal control** (within and between public institutions) and **vertical control** (of citizens over programme managing agencies) would yield adequate approximations as to the extent of direct or indirect citizen participation in the implementation of these projects. This assumption is expressed in the following equation (valid only for the measurement used in this project):

**Horizontal control + vertical control = user participation in the oversight of administration**

**Transparency International hopes that this methodology, besides serving the programmes selected thus far, can also be applied to any income transfer programme at the national level** (covering other countries in the region) or even at the sub-national level, for example in departments and municipalities. The EELA project methodology, besides being applied to the CCTPs in the countries indicated above, has also been adapted to assess the large-scale *Mision Vivienda* programme in Venezuela, a social programme which provides relief housing in Venezuela.

# EELA METHODOLOGY

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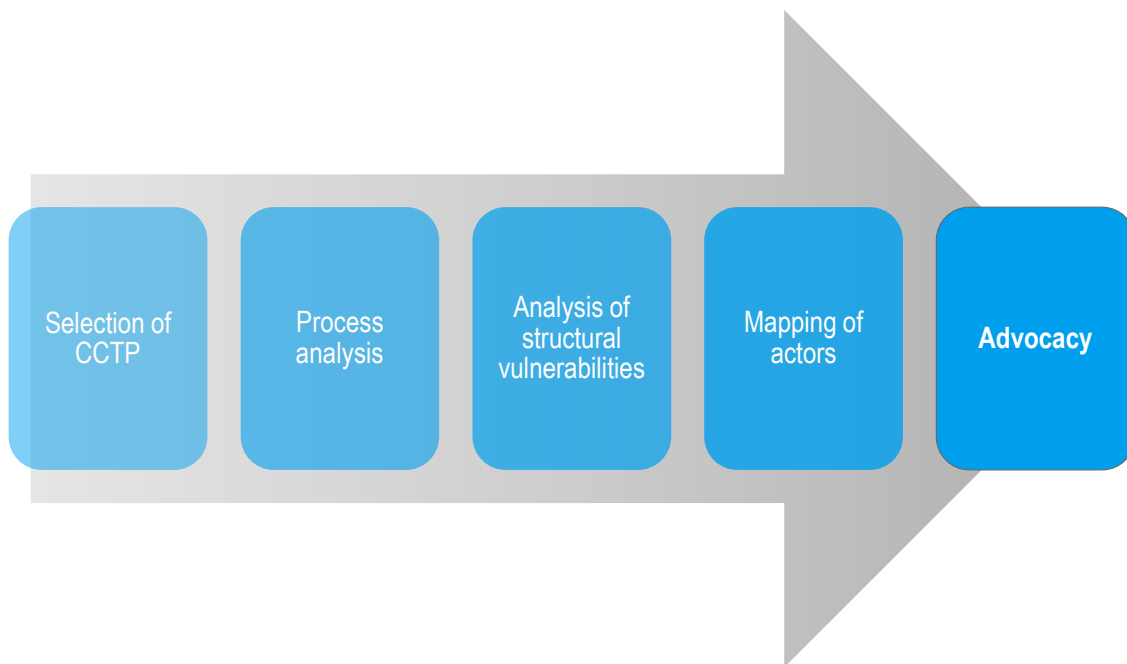
Before describing the EELA findings and recommendations, it is important to provide a basic idea about the project's methodological framework (a more in-depth discussion can be found in the following link:

[www.transparency.org/whatwedo/publication/protecting\\_social\\_programmes\\_anti\\_corruption\\_toolkit](http://www.transparency.org/whatwedo/publication/protecting_social_programmes_anti_corruption_toolkit)

As previously mentioned, the EELA methodology allows the identification of risks to the integrity of CCTPs, in terms of both their design and implementation. In order to identify such risks, we evaluate two aspects of each CCTP component:

1. **Integrity mechanisms:** that is, indicators concerning transparency, accountability and control (both horizontal and vertical) of each CCTP component.
2. **Integrity performance:** that is, the level of regulation, capacity and effectiveness of human, financial and technical resources available for effective control of the programme. The methodology developed entails four advocacy stages.

**Figure 2. The Five Stages of EELA.**



Source: Prepared by the author

## Stage 1. Selection of CCTP

The selection criteria for this project are as follows:

- national income transfer programmes of particular interest due to their wide scope and objectives (Colombia, Dominican Republic, Guatemala, Honduras, Bolivia and Peru)<sup>6</sup>
- social security schemes which grant unemployed individuals, those in the informal labour market or those with below minimum wage incomes an allowance for every child under 18 years, in exchange for performing certain co-responsibilities (Argentina, Asignación Universal por Hijo)
- social programmes for combating poverty with the highest number of beneficiaries

## Stage 2. Process analysis and identification of components

Once the programmes have been selected, the next stage is called **process analysis** and, through desk-based analysis of primary and secondary material, seeks to understand how each programme works, who its main stakeholders are, and the components of its operation. In this way, the **components** of the programmes are defined: targeting, admission, payments, monitoring of co-responsibilities, grievances and complaints, and programme exit by beneficiaries. This process has preliminary stages (preparation, development), implementation stages and post-implementation stages (evaluation).

Below is a typical model of CCTP components (in the country-by-country results analysis, this same model will be used to map the programme components).

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<sup>6</sup> It should be noted that the EELA methodology has also been applied to another social investment programme concerning social housing in **Venezuela**. All components of this programme, **Gran Misión Vivienda**, have been analysed according to the processes and stages laid out in the EELA methodology. To learn more about the analysis conducted by TI Venezuela, see the following link: <http://transparencia.org.ve/que-hacemos/monitoreo-a-la-corrupcion/gran-mision-vivienda-venezuela/>

**Table 1.**  
Typical model of CCTP components

COMPONENT	DESCRIPTION
Targeting	Identification of the target population by the programme, requirements and definition of conditions
Inclusion	Definition of databases, including the identification of the programme's potential beneficiaries
Transfer	Forms of delivery of the benefit or the transfer, and identification of those responsible at the central and local levels
Monitoring of conditions	Verification of compliance with the conditions, and role of educational and health institutions
Grievances and complaints	Mechanisms for identifying failures in any of the above stages, and clear definition of responsibilities
Exit	Application of the criteria for exiting the programme, when the target beneficiaries show that their conditions have improved

Source: prepared by the author

### Stage 3. Analysis of structural vulnerabilities and performance

Using the information collected and systemised in earlier stages, we now proceed to assessment (measurement) of the above-mentioned components. The goal of this stage is to **identify the most vulnerable components of the programme, where threats to integrity are more likely**. A set of oversight variables is used to create a ranking of components, based on their level of vulnerability. At the same time, the general level of vulnerability of each component is assessed based on an **analysis of two dimensions: integrity performance and integrity mechanisms**.



**Table 2.**

Measurement indicators

EVALUATED DIMENSIONS	NUMBER OF INDICATORS	TYPE OF INDICATORS
Performance	4	Regulation Capacity Effectiveness Efficiency
Mechanisms	4	Transparency Accountability Horizontal Control Vertical Control

The **performance** dimension is defined as the degree of **effective functioning of the concrete control mechanisms of each component**.

Indicators:

- **Regulation:** existence of formal rules for the component under study, as well as the enforcement of such rules in practice
- **Capacity:** the responsible authorities have adequate resources (financial, technical and human) for achieving the objectives
- **Effectiveness:** the ability to measure compliance with objectives and achievement of intended results
- **Efficiency:** efficient and appropriate use and management of available resources in line with stated purposes

In this way, the performance analysis indicates if the programme has adequate resources to perform and monitor its objectives, if it is properly implementing the relevant laws and regulations and if it is making effective use of the resources allocated.

The **integrity mechanisms** dimension seeks to establish the degree of formalisation of and compliance with the regulations and controls governing each area, among both participants themselves and third parties interested in monitoring the activities.

Indicators:

- **Transparency (T).** Transparency is related to a system of legal obligations which guarantee access to public information, by means of active disclosure of information and timely response to information requests. It refers to the options available to stakeholders for accessing information concerning the CCTP: responsibilities, objectives, procedures, rules, regulations, etc.

- **Accountability (A).** Accountability refers to the direct control mechanisms available to the participants in the process examined. It takes into account the internal accountability processes among the stakeholders (including, above all, the beneficiaries), as well as less direct mechanisms, such as information exchange between participants
- **Horizontal control (HC).** Horizontal control refers to the level of direct oversight (over CCTP practices and procedures) exercised by external, independent state agencies
- **Vertical control (VC).** Vertical control refers to the degree of oversight over each component on the part of citizens, the media and civil society organisations

## METHODOLOGICAL NOTE

These indicators incorporate four basic human rights criteria: **Availability, Accessibility, Acceptability** and **Adaptability**, which are particularly relevant for ensuring the level of direct connection with beneficiaries or civil society groups. The criteria are explained in detail in the extended methodology (see Appendix).

Each of the above indicators must be verified through a **qualitative assessment** based on the findings associated with each variable, with reference to the information compiled as part of the process description stage, to the guiding questions and to a checklist that is drawn up in collaboration with officials and experts.

Some examples of guiding questions<sup>7</sup> are:

1. Do regulations adequately cover the full range of relevant activities?
2. Was there a needs assessment of the human resources associated with the component being analysed?
3. Is the component's budget sufficient to perform its functions?
4. Are there quantitative and/or qualitative evaluations?
5. Are improvements made based on the results of the evaluations?

Once each component has been analysed against each variable, the **quantitative assessment** can proceed. This assessment awards a score of between one and five to each variable, using the qualitative observations as reference and justification.

In doing so, the methodology generates a five-level vulnerability classification: high, medium high, medium, medium low, and low, as shown in the table below.

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<sup>7</sup> See the full list of guiding questions in the methodology.

**Table 3.**

Vulnerability levels by component

REFERENCES	VULNERABILITY LEVEL	COLOUR USED
12 or less	High	Red
Between 13 and 20	Medium High	Orange
Between 21 and 28	Medium	Yellow
Between 29 and 35	Medium Low	Light green
36 or more	Low	Dark green

Source: prepared by the author

Therefore, a score of 12 or less shows us that the component being analysed has high or significant risks associated with performance and/or integrity. This should raise red flags and possibly prompt a thorough analysis of the component's stakeholder relationships in the next stage.

**Table 4.**

Example of vulnerability analysis by component

	Component	PERFORMANCE (P)				INTEGRITY (I)				PERFORMANCE (P)	INTEGRITY (I)	TOTAL D+I	VULNERABILITY LEVEL
		R	C	F	E	T	A	CH	CV	Total	Total		
1	Targeting	4	3	1	3	2	2	2	2	11	8	19	Medium High
2	Inclusion	5	3	3	3	3	2	2	2	15	10	28	Medium
3	Transfer	5	3	2	3	3	2	3	2	13	10	23	Medium
4	Compliance	4	3	2	3	3	2	3	2	12	10	22	Medium
5	Grievances and complaints	4	3	2	2	2	2	2	3	11	9	20	Medium High
6	Exit	4	4	2	2	2	2	2	3	12	9	21	Medium
	<b>Average</b>	4.3	3.2	2.0	2.7	2.5	2.0	2.0	2.3	12.3	9.3	22.1	Medium

This table indicates, for example, that the components most at risk, in terms of programme integrity, are targeting, and grievances and complaints. In both components, the level of vulnerability is medium high.

#### Stage 4. Analysis of vulnerability in practice: mapping of actors and relationships.

The fourth stage entails the identification of (formal and informal) relationships among actors or “parties” being studied. Typical actors include: the national authority which regulates and administers the programme, regional or local authorities charged with its implementation, entities required by law to carry out the transfers, educational and health institutions involved in monitoring beneficiary compliance with co-responsibility conditions, and the beneficiaries or final recipients.

In the **mapping of actors and relationships stage**, the analysis need not address all components of, and actors involved in, the CCTP, but can instead **focus specifically on the most vulnerable component, as identified in the previous stage of the methodology**. This stage aims to provide a deeper understanding of the risks to integrity posed by the CCTP, by offering a new lens: that of the actors and the relationships among them in the specific component being assessed.<sup>8</sup>

This stage consists of **fieldwork** and has two overall objectives. The first is to understand the extent of compliance with the rules governing actors' relationships in each component. The second objective is to **collect information for use in the component's integrity mechanisms assessment**. As with the integrity mechanisms assessment, here each actor's relationship is assessed numerically, based on four indicators: **transparency, accountability, horizontal control and vertical control**. In this way, the methodology seeks to guarantee that all those relationships that could affect the component under review are assessed for integrity. This stage is very important, as it serves as a case study of the integrity risks for the most vulnerable components. As such, it assists in identifying **where the risks are** and **which institution is responsible or most affected by those risks**. It also allows **resources to be focused towards the analysis of only the weakest relationships**.

Using interviews and focus groups, this stage allows verification of the actors map created in the previous stage and the creation of a final map.

For instance, if the analysis shows low integrity results in the payments component, an actors map will be created which, by considering all relationships among institutions and individuals involved in payments, demonstrates how it is that, in practice, the payment process is not transparent. Therefore, in this example we would need to examine: the relationships between beneficiaries and officials responsible for making payments; the involvement (or not) of the banking system (transfers to banks); the relationship between the financing institution and the entity responsible for financial administration, etc. The actors map is drawn up based on the formal relationships that should be in place in the delivery of payments but it is then validated by stakeholders on-the-ground to capture how formal and informal relationships are operating in reality around this component.

## STATISTICAL RELEVANCE OF DATA

The data collected by the EELA project **does not claim to be representative** of a certain population or group. Based on the resources available, the project team decided to examine the regulatory frameworks and programmes using a series of integrity indicators. The actors maps, though not statistically representative, provide illustrative **case studies** that are crucial to the qualitative approach of the project.

The analysis also does not suggest that the validation process for the actors maps with local stakeholders and beneficiaries is wholly representative, as might be the case with household surveys.

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<sup>8</sup> For further information, see the methodology.



# FINDINGS

## REGIONAL OVERVIEW

### Structural vulnerabilities

Reviewing specific programmes was not the sole purpose driving the development of the EELA methodology. Rather, an important aim of the EELA project has been to generate comparative analyses that identify patterns – that is, that signal the programme components and relationships which, in more than one country, prove to be most vulnerable.

**Table 5.**

Programmes analysed, number of beneficiaries and annual budget<sup>9</sup>

COUNTRY	PROGRAMME	BASELINE YEAR	NUMBER OF BENEFICIARIES	BUDGET 2011-2012 (USD)
ARGENTINA	Asignación Universal por Hijo (AUH)	2012	3.540.717	2.883.780.726
COLOMBIA	Familias en Acción	2012	11.719.319	733.400.799
DOMINICAN REPUBLIC	Programa Solidaridad	2011	2.947.164	134.419.952
GUATEMALA	Mi familia progresa (2011) Mi bono Seguro	2012	750.000	155.410.200
HONDURAS	Bono 10.000	2012	1.875.000	27.976.667
BOLIVIA	Bono Juancito Pinto	2012	1.822.874	53.491.879
PERU	Juntos	2011	2.765.521	323.342.805
<b>Total EELA II</b>		2011/2012	<b>25.420.595</b>	<b>4.311.823.028</b>

Prepared by the author based on data from UN-ECLAC, 2012

Comparative analysis reveals that **the scores for integrity performance are higher (that is “better”) than those for integrity mechanisms.** This seems to suggest that the institutions responsible for these programmes have defined the components to ensure that they are consistent with integrity standards, and in most cases have made use of ad hoc frameworks and laws in order to regulate the various components. However, the latter does not guarantee that a sufficient level of integrity will be achieved. In fact, it is a matter of concern that **the vulnerability levels reported by the chapters, with the exception of Argentina and Peru, usually range from medium to**

<sup>9</sup> Prepared by the author based on data from UN-ECLAC, 2012.

**medium high.** In many cases, this is explained by the fact that rules and standards of **transparency, accountability and control are not being correctly applied.**

Below is a table listing the various assessments conducted during the process analysis in the EELA participating countries. The purpose of this comparative exercise is to establish whether certain components are typically associated with higher risks across the different conditional transfer programme.

**Table 6**Vulnerability patterns of CCTP components<sup>10</sup>

VULNERABILITY LEVELS							
Component	Argentina	Bolivia	Colombia	Guatemala	Honduras	Dom. Rep	Peru
Financing	Na	Medium	N/A	N/A	N/A	N/A	N/A
Targeting	Medium low	N/A	Medium high	Medium	Medium	Medium	Medium low
Inclusion/incorporation/subscription	Medium low	Medium	Medium	Medium	Medium High	Medium	Medium low
Follow-up/co-responsibilities	Medium low	N/A	Medium	Medium	Medium High	Medium	Medium
Transferring resources to the responsible institutions	Medium low	Medium high	N/A	N/A	Medium	Medium	Medium low
Monitoring and evaluation	N/A	N/A	N/A	N/A	High	Medium	N/A
Bono delivery	N/A	Medium	Medium	Medium low	Medium	Medium	N/A
Grievances and complaints	Medium low	N/A	Medium High	High	Medium High	Medium High	N/A
Exit	Low	N/A	Medium High	Medium High	N/A	Medium	N/A

<sup>10</sup> It should be noted here that, when a component has not been assessed by the study because 1) the information available is not sufficient, or 2) that component is not known by that name or does not exist in a specific programme, the result rendered by the methodology will be 'NA' (not applicable).

In general, it follows from this exercise that:

- Some components show high vulnerability in more than one country, and therefore **governments and civil society organisations should pay more attention to these areas in order to reduce potential lapses and prevent corruption.**<sup>11</sup>
- The **grievances and complaints** component (followed by the exit component) is the one **most frequently** associated with **medium high to high vulnerability** levels.
- Concerns have been raised regarding the **medium** levels commonly attributed to the **targeting** and **admission** components, which in several countries remain rather weak and fail to facilitate effective citizen oversight.
- Low or **insufficient levels of access to information** have been observed in all components.
- Many chapters report that processes for tracking co-responsibility compliance **have not been adapted to cultural, linguistic and gender factors** (the availability, accessibility, acceptability and adaptability criteria mentioned above).<sup>12</sup>

As regards the **grievances and complaints component**, we would highlight the following in particular:

- the absence of both **clear signposting as to who beneficiaries should contact and how** and service protocols for receiving and handling petitions and enquiries from citizens
- the absence of **tracking systems for requests or grievances**, with the result that, where these are in fact filed, it is unclear how or when they are supposed to reach their formal addressees (for instance, in Honduras, the Community Committees report incidents to the central authority, but they receive no response)
- the obstacles to access (faced by all beneficiary groups) presented by the lack of measures guaranteeing that the relevant information is available in more than one language
- the commonly occurring phenomenon of **'informal' grievance and complaint systems**, which rely on connections with political parties, public officials or local representatives (for instance, in the case of *Familias en Acción*, in Colombia, complaints are usually made to a municipal contact person or to 'mother leaders', with no formal system in place)

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<sup>11</sup> In this regard, it is important to clarify that the methodology should be used to highlight and assess **risks to a programme's integrity**, and based on that provide recommendations to reduce the possibility that breaches of the integrity of a CCTP will occur. This is not tantamount to presenting clear evidence of cases of corruption. What it does help to identify, in a rigorous and systematic fashion, are any weaknesses which could aggravate the vulnerability of programmes to misconduct.

<sup>12</sup> This was already evident in the study of rules and regulations (process analysis). In most cases, the latter do not appear to take into account minorities, populations affected by more than one vulnerability factor and populations with no access to information due to low education and household income levels. This has been evidenced and verified – for instance, in Argentina, Bolivia and Guatemala.



## WHY IT IS IMPORTANT TO HAVE SYSTEMS IN PLACE TO INTERACT WITH CITIZENS

Building a robust and functioning service to attend to user enquiries will be vital considering both the size of the target population and that enquiry services already represent the principal channel of communication between beneficiaries and authorities. Existing examples, in countries like **Mexico and Brazil**, show that, where these services are properly developed, they can deal with hundreds of thousands of queries, questions and even complaints of abuse of authority. Proper development entails the adoption of **systems and service protocols for receiving, assessing and responding to citizen submissions**, as well as optimal coordination with internal and external oversight bodies. In this regard, the relationship that civil society organisations can forge with those responsible for the programmes, in order to develop efficient protocols and systems for handling citizen enquiries, presents a significant opportunity to improve the quality of CCTP management in the region.

With regard to the **exit** component:

- In general, the programmes under review fail to explain how or when it may be considered that beneficiaries have ‘graduated’ from a CCTP. In fact, virtually none of the countries examined has clearly established such criteria for the CCTPs, leaving open the question of whether exit from a programme means that people no longer live in extreme poverty or simply that they have received basic education and minimum health care.
- The points of exit from programmes are often not clearly or even technically defined. It is unclear whether the programmes “discharge” beneficiaries because **they have reached a certain age**, because their **poverty** has genuinely been alleviated or because a certain period of time has elapsed, irrespective of any changes experienced by households.
- **There is a lack of clear criteria for connecting the beneficiaries** who achieved the desired health and education levels recommended by the CCTP with the countries’ social welfare networks, in order to prevent those graduates from falling back into an intergenerational cycle of poverty.
- There are no monitoring systems in place to prevent **former beneficiaries from receiving support to which they are no longer entitled**.

## REGARDING THE EXIT COMPONENT

In respect of the exit component, it is worth noting the recent changes in the *Bolsa Familia* programme in Brazil, which has started to link exit criteria with insertion into the labour market or other productive activity, and even with national programmes for non-conditional transfers. There is also the example of the *Oportunidades* programme in Mexico, which over the last 10 years has developed a Differential Support Scheme, which helps families become increasingly independent and achieve better labour market integration.

Though not representing the lowest scores, of equal concern is the information reported by chapters regarding the **admission** or **identification** stage:

- While regulations are sufficient and significant political focus is placed on providing assistance to all those that meet the eligibility criteria, **transparency levels are poor.**
- In nearly all the countries analysed, **two or three state agencies usually participate in the admission stage**, with a **lack of clarity regarding their respective roles and responsibilities**, commonly resulting in an overlap of duties – for example, in identifying and assessing families in need
- In most cases, there is a complete absence of **control or monitoring by civil society organisations to ensure that the relevant legal requirements are met.**

### Vulnerabilities in practice: an overview of stakeholder relationships

Below is a **table of vulnerability patterns in actor relationships**. The relationship analyses which yielded the most striking results have been compared. Based on this comparison, we are better positioned to highlight the areas and relationships in need of closer attention if we are to enhance the integrity of the programmes.

**Table 7**Integrity of programme stakeholder relationships <sup>13</sup>

	STAKEHOLDER RELATIONSHIPS		Argentina	Bolivia	Colombia	Guate	Dom Rep	Honduras	Average
MG1	Beneficiaries	Authorities managing the programme at the state level	13		8	5	7	8	8.2
MG2	Beneficiaries	Authorities managing the programme at the local level			9	5	7	7	7
MG3	Financial institutions	Programme managers at a national level	12				4	6	7.3
MG4	Financial institutions	Beneficiaries	8	6			4	6	6
MG5	Beneficiaries	Health and education responsible entities co-responsibilities	14	14				6	11.3
			11.8	10	9	5	5.5	6.7	

Note: The information for Peru was not included because different indicators were used at that time.

<sup>13</sup> As explained in the methodology section, analysts can choose the actors' relationships which pose the greatest risks and assess them systematically. The ones examined here are only those which were identified as most exposed to risk by the chapters. However, the programmes under review show many differences in terms of objectives and types of actors, and as a result this exercise has only taken into account similar relationships in which actors are of the same kind and play the same roles (for instance, the transferring entity or beneficiaries).

In general, the relationships most analysed by the project were those relationships that are most directly linked with beneficiaries; in other words, those that strengthen official links between the CCTP participants who receive the transfers (usually female heads of households) and local or national level actors.

This comparison shows that:

- The most vulnerable relationship is that between **beneficiaries and the authorities managing the programme at the local level**. This relationship in particular should be strengthened in order to guarantee that the rights of women and families with respect to the programmes are met. The areas in greatest need of action and answers from authorities and of clearer, more transparent, dialogue are those which are most prone to cause system failures. This weakness could impact upon the entire complaints and grievances system, which appears to be the most vulnerable component in a majority of countries.
- The relationship between **beneficiaries and those entities responsible for making payments (including financial institutions)** are equally vulnerable. It is important to highlight that, in many of the cases examined by the chapters, payment handling is increasingly delivered via the banking system: as a mechanism against fraud and corruption, beneficiaries are advised to open designated bank accounts, allowing receipt of programme payments with fewer risks.
- In all of the countries studied there is an absence of **independent, external bodies providing oversight and monitoring** over the institutions responsible for handling payments. This means that the financial management of benefit payments is not subject to parallel control mechanisms. In other words, the increasing involvement of the banking system in payment handling is no assurance per se of transparency and accountability in the area of payment processing.
- The relationship between the **beneficiaries and the state delivery agencies** is vulnerable. Most beneficiaries do not regard institutions as accessible, they have no special channels for participation and giving feedback and, which is of still greater concern, **they do not feel that institutions are providing access to all the information to which they are entitled**. Moreover, the **informal communication systems** that beneficiaries can use to submit their requests in fact give rise to **increased risks of abuse** by local managers, public officials, politicians and individuals responsible for programmes.

This data leads us to highlight a further source of significant concern: namely, **abuse of social programmes for political ends**. We have found evidence of weak relationships and an absence of procedures, both of which may increase the risk that such abusive and damaging behaviour arises.

It is natural that electoral candidates will be aware of these programmes and offer to assist with their implementation in order improve outcomes for communities. This said, restraint is certainly required when it comes to making promises or claiming that the correct administration of these programmes depends on one candidate or another. This would constitute an illegitimate use of the programmes and, as such, an abuse of these mechanisms for political gain.



# FROM FINDINGS TO RECOMMENDATIONS

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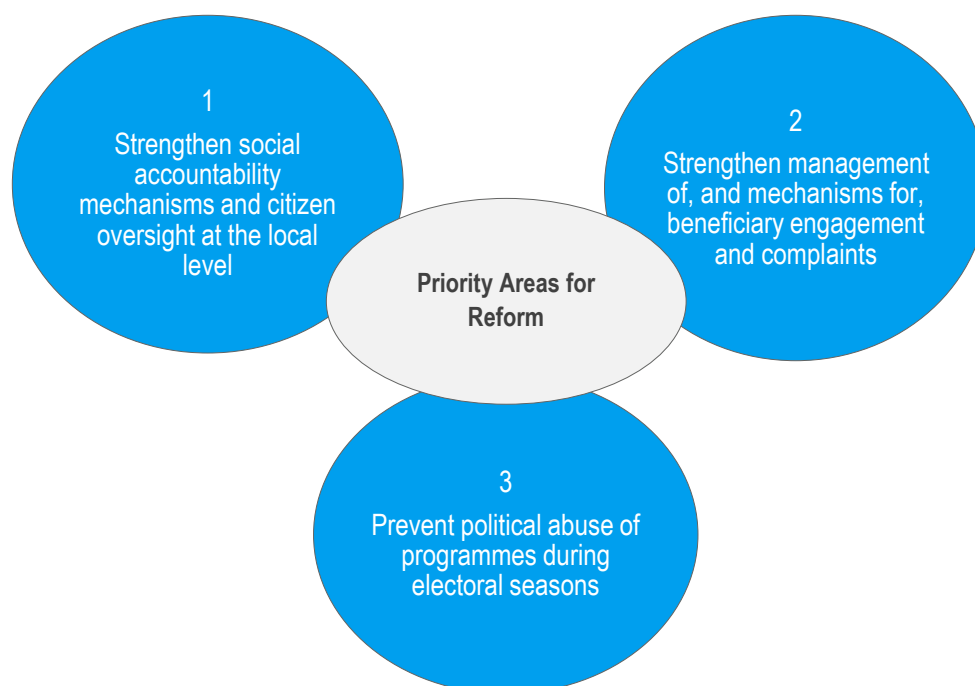
## REGIONAL RECOMMENDATIONS – THREE AREAS OF WORK

In the following recommendations, we have tried to adopt a technical perspective that incorporates the expectations of programme administrators, as well as beneficiary feedback regarding their daily experiences and what improvements they would like to see change with respect to the CCTPs.

More than four years of work in this area has brought us closer to the various CCTP stakeholders and we have begun to better understand their perspectives on how to implement improvements. As such, the actions we recommend at the national level are meant to address the concerns of citizens enrolled in these programmes; to provide programmes with pragmatic recommendations; and to achieve some medium- to long-term impact. Our long-term goal remains to ensure that CCTPs, and other social investment programmes, operate with the highest standards of integrity.

Our analysis has allowed us to develop a set of **recommendations along three lines, as set out in the figure below**, which, in turn, lead to concrete actions or sub-areas of work at the local level.

**Figure 2. Three critical areas for improvement of CCTPs**



The recommendations presented below represent a direct response to the vulnerabilities found at the regional level and in every programme studied. They are grouped under the three central priority areas of work. These areas assume specific actions to be taken in each country:

- **Strengthening the mechanisms for social accountability and oversight (vertical control).** That is, improving:
  - access to information and establishment of public information platforms
  - non-partisan community-based monitoring mechanisms
  - ties with internal and external control bodies
  - legal follow-up of cases of exclusion
- **Strengthen institutional management of, and mechanisms for, beneficiary engagement and complaints**
  - improving formal grievance and complaint mechanisms
  - creating effective communication channels between beneficiaries and independent control bodies, and/or local citizen oversight mechanisms
  - strengthening, training and equipping oversight bodies to handle grievances and complaints, including the capacity to deal with human rights, ethnicity and gender issues
  - ensuring implementation of horizontal and vertical control mechanisms governing citizen complaints
- **Prevent political abuse of programmes during electoral seasons**

- building collaborative alliances with electoral monitoring bodies in order to expose risks of abuse of social programmes for political or personal purpose.
- documenting potential risks, reporting them to oversight bodies and proposing alternatives to improve the efficacy of control
- educating electoral candidates and political parties regarding the importance of reporting risks and informing voters of potential abuses
- organising campaigns to raise awareness among target communities about programme participation rights and how to report potential political abuse of social programmes

Each area requires a series of advocacy actions to effect change. Particularly important will be the provision of technical support to all parties involved: to government bodies responsible for operating these programmes, to civil organisations interested in monitoring and overseeing them, and to the organisations and associations representing beneficiaries.

## FROM RECOMMENDATIONS TO RESULTS: KEY STEPS

### Critical area 1: Strengthen social accountability mechanisms and citizen oversight at the local level

The first area of action reflects the need to continue working with populations involved in the social programmes which were analysed, so that they can themselves **strengthen their audit and control strategies** and perform *ongoing* monitoring of the mechanisms by which public resources are delivered, improving both the public availability of relevant information and compliance with the programmes' objectives.

#### Integrity checklist

**The creation of comprehensive information platforms** which compile information regarding all relevant programmes, their requirements and the application processes that will enable programme's to achieve the necessary step of reaching more beneficiaries.<sup>14</sup>

- The options for creating public databases will be analysed, as well as those for forming groups of beneficiary leaders who can access these databases and disseminate information at lower levels.
- The public dissemination of information is even more important in those countries where the range of programmes is characterised by the inclusion of various types of vulnerable populations (for example, Colombia) or where there are different programmes for each state, region or department in the country (for example, Mexico). Civil society organisations can play a vital role here due to their specialist knowledge of the field and the capacities and human resources they have built to identify integrity risks.
- Together with improvements in general information, local work with social organisations and female leaders should continue, in order to raise awareness about appropriate

<sup>14</sup> Through the IPRO programme, TI Mexico, with support from the United Nations Development Programme (UNDP), has built a solid database of social programmes, accessible to all, which contains information about application requirements, invested resources and expected results.

processes and to provide clear information regarding the entitlements that, in some cases, they are not able to access.

- It is critically important to ensure **proper legal follow-up of cases of exclusion**, so that the results of citizen oversight actions and other monitoring initiatives translate into specific actions to punish illegal activities and serious misconduct.
- The social audit functions of existing local and grassroots organisations should be strengthened and supported, as these allow oversight and vertical control of the components and relationships most exposed to integrity risks.

#### Note on good practices

Chapters have gathered a substantial volume of information and are increasingly positioning themselves as reliable and independent partners to governments in efforts to guarantee greater transparency in the programmes studied (this is particularly true of Guatemala and Peru). The opportunities that this relationship of trust open up should not be wasted. Indeed, we must make every use of these spaces to ensure our voice, and that of the beneficiaries, is heard.

#### Some examples to emulate

We have seen that in many cases beneficiaries continue to view programme benefits as favours rather than entitlements, which presents certain obstacles when it comes to demanding improvements or changes from government authorities. In this regard, it is vital to strengthen the citizen committees and beneficiary organisations that, by leveraging existing legal frameworks which promote citizen participation in social policy, help oversee local programme oversight.

Good examples here are the **Committees for Community Advancement associated with the ‘Oportunidades’ programme in Mexico**, which were created by beneficiaries themselves for the purpose of monitoring programme activities. These Committees represent beneficiaries within the programme, pressure institutions to provide quality service to recipients, channel concerns and complaints and promote actions to strengthen social audits. In each of the more than 95,000 towns covered by the programme, there is at least one Committee for Community Advancement which can perform audit and oversight roles.

The social oversight system associated with the **Bolsa Familia** programme in **Brazil** represents a further example of good practice. The system consists of collegiate bodies, made up of civil organisations, operational in every municipality, which oversee and monitor the programme’s development. These bodies have access to the federal government’s databases, can report any mismanagement to the Ministry for Social Development, and can help evaluate both compliance with co-responsibility conditions and implementation of exit processes.

#### The role of Anti-Corruption Legal Advice Centres

The on-the-ground presence and expertise of our Anti-Corruption Legal Advice Centres (**ALACs**), now operating in 10 countries in the region, are vital for expanding and improving the services provided to those in greatest need.

In Venezuela, for instance, where the EELA methodology has been applied to the social housing programme “Gran Misión Vivienda”, ALACs and “mobile ALACs” have allowed the rapid collection of testimonies (within a few weeks) regarding the exclusion of potential beneficiaries, unfinished houses and, above all, mismanagement in construction sites. These testimonies have now formed the basis for public pressure to improve services.

In this regard, it is fundamental to ensure ongoing dialogue between the ALACs and the **oversight entities and bodies both at the national and local levels (ombudsman and comptroller offices)**: we have identified an urgent need to develop communication channels for frank and clear communication with these latter bodies; without such channels we cannot report the issues and risks identified nor ensure that our suggestions for improving and streamlining processes are given due consideration. These oversight bodies handle large volumes of work concerning a range of sectors, making it hard to focus special attention on social programmes. Chapters must be capable of filling this institutional gap by providing concrete support – such as reporting problems and delivering technical assistance. Existing oversight bodies must continue their efforts and be proactive if the identified vulnerabilities are to be overcome. This will also mean that two-way (internal and external) control mechanisms should be put in place, beginning with those components that are more prone to integrity risks. In this respect, the independence and autonomy of chapters are essential qualities for achieving spaces of trust and dialogue between government and non-government actors, in which to collaboratively design oversight mechanisms.

## Critical area 2: Strengthen management of, and mechanisms for, beneficiary engagement and complaints

This area of action consists in **making recommendations for improvement** to entities at the national – and more importantly at the local – level, as it is here that civil society-led **oversight and control is particularly irreplaceable** – especially given how weak the grievance and complaints processes were judged to be by this study.

### Integrity checklist

- Information concerning the criteria for beneficiary selection, renewed support and exit should be clear and culturally sensitive. In some cases this means that material should be translated into native languages or that media outlets such as community radios will need to be used, etc.
- Recommendations should address aspects of positive performance (good practices) as well as those which are not meeting expectations and which, therefore, prevent users from asserting their rights.
- Civil society organisations should continue their **fact-checking** efforts regarding as yet undelivered programme promises and proposals and should update recommendations accordingly, and support and monitor compliance with citizen appeals against exclusion from programmes
- The **technical support** provided by civil society organisations should not be limited to government administrators but should also include other organisations interested in the control and oversight of these programmes, who may have their own **methodologies for identifying vulnerable areas** and may suggest local-level advocacy actions.
- Grassroots groups must strive to develop ongoing dialogue with oversight bodies, such that the latter receive positive pressure to maintain close monitoring of programme activities. Communities possess knowledge about specific cases, data and evidence, which is vital to the work of these bodies.
- There are many cases where productive and efficient communication with beneficiaries is achieved using community contact persons and local officers. However, this should

not preclude the creation of official channels for informing citizens; nor should it become a pretext for favouring certain groups or communities only.<sup>15</sup>

- Too often, instances of vertical control and horizontal control do not enjoy the same response time on the part of managing agencies. Managing agencies should be urged to put in place efficient procedures for vertical control, so that citizens can receive fast and effective responses from their public counterparts.

#### Note on good practices

Regional analysis reveals cases in which reforms to accountability mechanisms have first been implemented at the local level; when they produce positive results, these good practices have then been recommended at the national level. In the 'Oportunidades' programme, for example, local complaints about the political bias of institutional intermediaries led to the rules of operation being changed, such that party officials were banned from acting as institutional liaisons between beneficiaries and municipal authorities.<sup>16</sup> In Guatemala, a good starting point for similar up-scaling of reforms could be the chapter's analysis of the potential and limitations of the queries and complaints handling system for the programme Mi Familia Progresas.<sup>17</sup>

It is worth noting that half the chapters participating in the EELA project are already engaging in this important stage and have submitted ideas for change and adjustment to the relevant officials in the managing entities. This stage will mean developing protocols and procedures for the proper reception and handling of, and response to, citizens' claims, including complaints and suggestions. Such procedures not only guarantee citizens' right to petition, they also help reduce the integrity risks detected by this study. If rights are to be exercised and upheld, it is vital to develop user enquiry services that are at once efficient, protect complainants, operate according to proper service protocols and provide clear responses to users.

### Critical area 3: Election campaigns

In response to the concerns outlined previously, the third area of work should be to strengthen control and transparency in the use of social programmes during political campaigns. The literature on the subject suggests that political abuse of social welfare schemes involves, to a greater or lesser degree, campaign and propaganda actions – including unlawful and illegitimate actions such as bribery (in this case, vote-buying in exchange for guaranteed admission in the programmes) or extortion (the threat of excluding beneficiaries based on their voting behaviour).<sup>18</sup> **These political abuses are both made possible and fuelled by the opacity and absence of information** regarding the mechanisms and criteria for admission to, renewed support via and exit from the programmes: if citizens are unfamiliar with the criteria for admission, for receipt of benefit or for

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<sup>15</sup> For instance, in the Colombian programme Familias en Acción, beneficiaries want to maintain the Municipal Contact Person's ability to receive concerns and complaints. However, they also recognise the value of formal mechanisms that speed up these processes and ensure equal and universal access (for instance, a beneficiary with a disability limiting her capacity to communicate – such as a deaf person – should be able to make a complaint on an equal level with other people, but there are no sign language interpreters for this purpose).

<sup>16</sup> Felipe Hevia and Christian Gruenberg, *Continuidades y reformas en el sistema de atención ciudadana del Programa de Desarrollo Humano Oportunidades*, Mexican Rural Development Research Reports (Washington DC: Woodrow Wilson International Center for Scholars, 2010), [http://wilsoncenter.org/news/docs/Monograf%C3%ADa\\_Hevia\\_Gruenberg.pdf](http://wilsoncenter.org/news/docs/Monograf%C3%ADa_Hevia_Gruenberg.pdf).

<sup>17</sup> Acción Ciudadana, *Informe de mecanismos de Quejas y reclamos MIFAPRO*, Monitoreo ciudadano al programa de transferencias monetarias condicionadas Mi Familia Progresas Fase II (Guatemala: Acción Ciudadana, 2010).

<sup>18</sup> Jordan Gans-Morse, Sebastián Mazzuca and Simeon Nichter, "Varieties of Clientelism: Machine Politics during Elections", *American Journal of Political Science*, 58, no. 2, 1 April 2014: 415–32, doi:10.1111/ajps.12058; Felipe Hevia, "Relaciones sociedad-estado, participación ciudadana y clientelismo político en programas contra la pobreza. El caso de Bolsa Familia en Brasil", *América Latina Hoy*, 57, 2011: 205–38.

programme exit, local political actors can take advantage of this lack of information to bribe or extort citizens, and so to influence election results.

#### Integrity checklist

- The availability of information regarding the criteria for admission, for receiving benefits and for programme exit that is clear, accurate and consistent over time is one of the most effective defences against political abuse of these programmes at the local level and for protecting not only the social rights (such as access to social programmes) but also the political rights of the poorest sectors, such as casting a free and informed vote.
- Building stronger links between civil society organisations and **political parties**, by offering **technical support** to aid those parties to take the necessary steps to avoid and prevent the fuelling of such abuses.
- In line with the above point, informing citizens about the potential risks of programme abuse during campaign periods, trying to identify political will regarding establishing **pacts or agreements committing political parties to refrain from abusing the programme**, defining game rules of elections – along with good practices for fair and transparent campaigns, and reporting and punishing bribery and extortion associated with granting or renewal of a programme.
- Suggesting **monitoring and assessment methodologies for tracking social programmes, in particular during election years**. These should further strengthen the programmes and ensure constant monitoring by civil society organisations. The latter should encompass analysis of fluctuations in beneficiary rolls in line with the election calendar, through to on-the-ground oversight of campaigns and election processes, to prevent social programmes from being used as a bargaining chip in vote-buying and coerced voting activities.

#### Note on good practices

Various countries have experiences of implementation which may be considered good practices, although the national political context can weaken the effectiveness of such experiences. This is the case with Mexico's "election shielding" programmes during federal and state elections,<sup>19</sup> or with Bolsa Familia in Brazil, both of which – by decentralising programme management – spread political responsibility for the programme's administration.

The longevity of programmes over time, despite changes in government, also presents a window of opportunity for the reduction of electoral and political abuse.

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<sup>19</sup> Gómez Álvarez, *Candados y contrapesos*.



# FINAL WORDS

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As noted earlier, the implementation of the methodology in the selected cases has enabled us to:

- compile useful data permitting identification of aspects that are not performing as intended by governments, and generate data about satisfaction levels among beneficiaries
- assess degrees of vulnerability and weakness in order to identify which components or processes are more prone to performance and integrity risks in each programme under analysis
- identify relationships among institutions or stakeholders which may have a negative impact on transparency, accountability or the participation of beneficiaries
- identify the stakeholders most exposed to corruption risks
- highlight good practices and policy proposals that, if sufficiently supported, implemented and developed at the institutional level, could prove beneficial for the programmes in question

It should be noted that, up until the present moment, cross-checking of data has been limited to this preliminary study: the methodology allows us to both deepen the analysis, through closer examination of the indicators, and to generate new insights, by moving the focus to other stakeholders or to areas with high performance (so as to understand what aspects are working well and why).

We are firm in our goal of ensuring that these programmes achieve their macro social objectives and in this goal the EELA project has been supported not only by civil society and by programme users, but also by governments – which want to offer better, fairer services that are more transparent and effective.

As such, we intend to make use of the spaces created through the EELA process in the participating countries to engage in dialogue with the implementing institutions, to highlight risks and to suggest cost-effective solutions that will broaden the representation and participation of right-holders, in order to ensure that beneficiaries themselves are change agents for integrity.

Ensuring increased transparency, accountability and participation means less diversion of public resources away from the people who need them the most, and towards the pursuit of more equitable societies.

# APPENDIX: COUNTRY-LEVEL FINDINGS AND RECOMMENDATIONS

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## NATIONAL FINDINGS AND RECOMMENDATIONS<sup>20</sup>

Below we present programme vulnerabilities, as detected by the project, and specific recommendations identified and developed by chapters as a result of discussions with public officials or exchanges with other civil society organisations. They are suggestions intended to lead to pacts and agreements with other stakeholders and will depend on the availability, in a given country, of not only spaces favourable to dialogue, but also of human and economic resources for introducing and monitoring the proposed changes.

### Argentina

#### Findings:

The **Asignación Universal por Hijo (AUH)** is a monthly cash benefit for families with children (up to a maximum of five per household), that meet certain criteria demonstrating vulnerability.

#### Vulnerable components

The table below shows that this programme has a **high performance score** (that is low vulnerability), with a total average of 4.75 out of 5 points. Of the countries examined, this programme has the highest score. In terms of **integrity**, its average score is also high, with 4.5 out of 5 points.

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<sup>20</sup> Detailed information regarding national data and findings is available on request via the Americas Department at Transparency International.

**Table 8**

Analysis of components based on performance variables and integrity mechanisms: Argentina

	Component	PERFORMANCE				INTEGRITY (I)				PERFORMANC E (P)	INTEGRITY (I)	TOTAL D+I	VULNERABILITY LEVELS
		R	C	F	E	T	A	CH	CV	total	total		
1	Targeting	3	5	5	4	4	4	3	4	17	15	32	Medium Low
2	Inclusion	3	5	4	4	4	4	3	4	16	15	31	Medium Low
3	Transfer / Beneficiaries payments	4	4	4	4	4	3	3	3	16	13	29	Medium Low
4	Conditionali ties compliance and monitoring c	5	5	5	4	4	5	4	4	19	17	36	Medium Low
5	Grievances	4	4	4	4	4	4	4	4	16	16	32	Medium Low
6	Exit	5	5	5	4	5	5	4	4	19	18	37	Low

$$D = 4,75/5 \quad I = 4,5/5$$

Based on the results obtained after applying the EELA methodology, vulnerability indicators can be largely classified as **medium to low**:

- Technically, this process carries some risk of distortion both in the targeting component and in the universality objectives associated with the admission component.
- Horizontal oversight bodies, in particular the *Auditoría General de la Nación* (National Audit Office) and the *Sindicatura General de la Nación* (National Accounting Office) do not share information about the AUH or fail to publicly disclose their reports. These failures are compounded by the fact that the beneficiaries of the AUH are not directly aware of the availability either of this information or of the disclosure issues.
- In all the cases that were analysed, **economic, geographical and linguistic barriers hinder access to, and use of, channels for information disclosure, for transparency and for accountability.**
- There is no ad hoc grievance and complaints system for AUH beneficiaries to facilitate claim handling (filing, investigation and response).

**Good practices identified:** the payment schedule for the benefit is announced on a monthly basis using the National Social Security Administration's (*Administración Nacional de la Seguridad Social*, or ANSES) own communication channels, including a web portal, as well as other local or community means. This information is also made available by many banking institutions. Equally, thanks to mechanisms implemented within the health system, the necessary health appointments and procedures can be scheduled in advance, thus facilitating both beneficiary compliance with AUH health co-responsibilities and the examination of children and adolescents.

**Table 9.**

Integrity of programme stakeholder relationships: Argentina

RELATIONSHIP	STAKEHOLDERS		TRANSP	ACCOUNT	CONTR H	CON
			Score	Score	Score	Score
MG1	ANSES	Holders/Beneficiaries	3	3	3	4
MG2	ANSES/Banco Nación	Holders/Beneficiaries	4	2	3	3
MG2a	ANSES	Holders/Beneficiaries	4	3	3	4
MG2b	ANSES/Banco Nación	Intermediaries/Beneficiaries	2	2	2	2
MG3	ANSES/Ministerios Educación y Salud	Schools and Health centres/ Ti Holders and Beneficiaries	4	3	3	4
MG4	ANSES	Holders/Beneficiaries	4	3	3	3
<b>Total average</b>			<b>3,50</b>	<b>2,67</b>	<b>2,83</b>	<b>3,33</b>

With regard to the relationships which were studied, the greatest vulnerabilities in terms of integrity are displayed in the accountability variable, followed by horizontal control, with the vertical control and transparency indexes achieving slightly better scores.

The findings of the mapping exercise suggest that the most vulnerable relationship is that between **the National Bank and the beneficiaries**, especially where there are significant geographical barriers, which are often present alongside cultural and indirect economic barriers.

Recommendations:

- It is very important to adapt programme information to the needs of those from different cultural and linguistic contexts.
- A grievances and complaints system dedicated to the AUH programme should be established, to improve and speed up the reception, investigation and resolution of citizen claims.

## Bolivia<sup>21</sup>

The **Bono Escolar Juancito Pinto** (BJP) is a conditional cash transfer for children (up to the first two levels of secondary school) attending state educational institutions all over the country.

Findings:

The Bolivian programme received a **high score for performance**, with a total average of 4.25 out of 5 points. However, in the case of **integrity mechanisms**, the average score is **rather low**: 2 out of 5 points. Therefore, overall, the components are ranked as having **medium to medium high** levels of vulnerability.

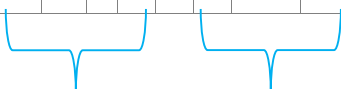
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<sup>21</sup> The analysis stage was completed following the same procedure for all of the countries reviewed. However, the Bolivian country assessment was carried out in 2010 and 2011.

**Table 10.**

Analysis of components based on performance variables and integrity mechanisms: Bolivia

Component	PERFORMAN CE (P)				INTEGRITY (I)				PERFORMAN CE (P)	INTEGRITY (I)	TOTAL D+I	VULNERABILITY LEVELS
	R	C	F	E	T	A	CH	CV	Total	Total		
Financing	4	4	3	5	3	2	1	1	16	7	23	Medium
Financial transfers to designated institutions	4	3	3	3	1	1	1	1	13	4	17	Medium High
Define beneficiaries	5	5	5	1	2	1	1	1	16	5	21	Medium
Establishment of the accredited educational institutions	5	4	5	5	2	2	1	1	19	6	25	Medium
Coordination with the armed forces	5	3	3	1	1	1	1	1	12	4	16	Medium
Enable and transfer to beneficiaries	5	3	4	5	1	2	2	3	17	8	25	Medium High



$$D = 4,25/5$$

$$I = 2/5$$

Among the various components, the most vulnerable concerns the role of **the armed forces**.

The study highlights that:

- This component **offers no channels for public participation**: that is, the possibilities for citizen and civil society involvement in oversight and vertical control are minimal.
- **There is no independent oversight of the activities of the armed forces**. The available information only tells us that the Ministry of Education, through the implementing unit, monitors and oversees their work. It is understood that there is an external advisory council whose reports or recommendations are not publicly available.
- Targeting continues to be problematic. For example, verification processes regarding the data used to assess eligibility for the BJP are inadequate.
- **It is unclear who safeguards programme funds**. Regulations concerning the BJP exist within the military, but these are for internal use only. As such, it is not known whether there is a requirement to record the initial and final volume of allocated funds.

In this regard, the methodology suggests that the BJP would be more beneficial if the grant was instead delivered directly to schools, at the beginning or at the end of the school year, as a subsidy for the purchase of school equipment.

## Integrity of relationships

**Table 11.**

Integrity of programme stakeholder relationships: Bolivia

RELATIONSHIP	STAKEHOLDERS		TRANSP	ACCOUNT	CONTR H	CONTR V	
			Puntaje	Puntaje	Puntaje	Puntaje	
MG1	Parents	Students	1	1	2	2	6
MG2	Directors	Professors	4	4	3	3	14
MG3	Armed Forces		1	2	1	2	6
MG4	Social Accountability		1	4	2	2	9
Average Total			1,75	2,75	2,00	2,25	

The relationship analysis shows that the armed forces continue to play a key role in handling beneficiary payments. Given the lack of evidence regarding the effectiveness and efficiency of programme administration provided by the armed forces, one might question whether their central role in the delivery process is warranted. The integrity analysis data, which evidences **low access to information, accountability and controls**, supports this conclusion

Recommendations:

- Clarifying and more adequately delineating the role and transparency of the armed forces in social welfare schemes will be vital in order to resolve the high concentration of integrity risks with this body.
- Access to information and accountability regarding the resources invested in the BJP should be improved, and measures should be taken to make sure that citizens can participate in control and oversight processes.

## Colombia

The *Familias en Acción* programme serves families living in poverty (according to the criteria established by the national government via the Administration for Social Prosperity), displaced families and indigenous families.

Findings:

The assessment of weaknesses shows that, in general, the programme has a **medium** vulnerability level.



**Table 12.**

Analysis of components based on performance variables and integrity mechanisms: Colombia

	Component	PERFORMANCE (P)					INTEGRITY(I)				PERFOR MANCE (P)	INTEGRITY (I)	TOTAL D+I	VULNER ABILITY LEVELS
		R	C	F	E	T	A	CH	CV	Total	Total			
1	Targeting	4	3	1	3	2	2	2	2	11	8	19	Medium High	
2	Inclusion	5	3	3	3	3	2	2	2	15	10	28	Medium	
3	Transfers	5	3	2	3	3	2	3	2	13	10	23	Medium	
4	Compliance	4	3	2	3	3	2	3	2	12	10	22	Medium	
5	Grievances and complaints	4	3	2	2	2	2	2	3	11	9	20	Medium High	
6	Exit	4	4	2	2	2	2	2	3	12	9	21	Medium	
	<b>Average</b>	4.3	3.1	2.0	2.6	2.5	2.0	2.0	2.3	12.3	9.3	22.1	Medium	



- The assessment identified some at-risk components – namely those of **compliance** and of **grievance and complaint** processes; while the most vulnerable component is **targeting**.
- As for the verification of beneficiary compliance with co-responsibilities, these are not subject to unified tracking mechanisms within the relevant healthcare and education bodies. Tracking relies on the designated contact person's level of managerial involvement – meaning that various processes are subject to the good or bad performance of the public official in question.
- There is **no official institutional channel for the handling of grievances and complaints**. As such, in most cases any difficulties that arise in the programme are not addressed systematically.

**Table 13.**

Integrity of programme actor relationships: Colombia

RELATIONSHIP	STAKEHOLDERS		TRANSP	ACCOUNT	CONTR H	CONTR V	
			Score	Score	Score	Score	Score
MG1	SISBEN municipal office	Beneficiaries	2	2	1	2	7
MG2	SISBEN pollsters	Beneficiaries	1	1	2	2	6
MG3	SISBEN municipal office	SISBEN pollsters	1	1	2	2	6
MG4	Municipal liaison	Beneficiaries	1	4	2	3	10
MG5	SISBEN Municipal office	National Planning Department	2	2	2	2	8
MG6	DNP- Directorate of Social Development	Department prosperity, social Development	4	2	2	2	10
MG7	DPS	Regional Directorates	5	5	3	1	14
MG8	Municipal liaison	Beneficiaries	5	5	3	2	15
MG9	Beneficiaries	Municipal office	2	2	2	2	8
MG10	Beneficiaries	SISBEN pollsters	1	1	1	1	4
MG11	Beneficiaries	Municipal liaison	5	1	1	2	9
<b>Average total</b>			<b>2,29</b>	<b>2,43</b>	<b>2,00</b>	<b>2,00</b>	

The analysis of key relationships would seem to confirm some of the weaknesses identified in the process analysis stage. Particularly clear is the central role played by the SISBEN, as this is the entity responsible for defining the eligibility criteria and for making final decisions on whether households will receive the benefit and on what grounds (displacement, poverty, victims, etc.). The main risks are found among those actors responsible for data collection and management at the local level, where monitoring of relationships is limited. It is striking that transparency and accountability scores are very low in all relationships in which **the SISBEN is involved** (with beneficiaries and with those conducting surveys).

#### Recommendations:

- The channels through which mothers can submit complaints, requests or report irregularities about the programme should be strengthened. This will be achieved by introducing mechanisms that guarantee confidentiality for, and protection of, complainants, and by establishing clear procedures so that complaints are properly handled and translate into improvement measures. These measures should be accompanied by mechanisms for accountability and access to information, which should be permanent, consistent and apply to all levels of programme implementation.
- The procedures for conducting the SISBEN survey must be reviewed in order to generate a detailed understanding as to the exclusion of entitled populations, on one hand, and the continued inclusion of non-compliant households on the other. A plan of action can then be implemented addressing the results of the review in such a way as to improve the targeting process.

## Guatemala

*Mi Bono Seguro* is a CCTP launched by the Council for Social Cohesion and administered through a trust of the Social Fund. This administration model (a trust) has been criticized by a Guatemala Congresswoman as being vulnerable to embezzlement and lacking audit mechanisms.<sup>22</sup> By May 2011 the programme covered 82 per cent of the municipalities in the country. However, towards the end of its term, the government made cuts amounting to a reduction of approximately 114,756 families.

#### Findings:

In general, the programme has a **medium level of vulnerability**. Analysis has identified various components with medium low levels of vulnerability and others with high levels.

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<sup>22</sup> <http://www.plazapublica.com.gt/content/fideicomisos-un-acto-de-fe>.

**Table 14.**

Analysis of components based on performance variables and integrity mechanisms: Guatemala

	Component	PERFORMANCE (P)				INTEGRITY (I)				PERFORMANCE (P)	INTEGRITY (I)	TOTAL D+I	VULNERABILITY LEVELS
		R	C	F	E	T	A	CH	CV	Total	Total		
1	Targeting	3	2	3	3	2	3	3	3	11	11	22	Medium
2	Inclusion	4	3	3	4	3	3	3	3	14	12	26	Medium
3	Follow-up of co-responsibilities	4	5	4	4	4	4	4	4	17	16	33	Medium low
4	Delivery	5	5	5	5	4	3	3	4	20	14	34	Medium low
5	Exit: Control beneficiaries lists, exclusion and graduation	1	2	2	3	1	2	2	2	8	7	15	Medium High
6	Grievances and complaints mechanisms	1	2	1	1	2	1	1	2	5	6	11	High
	<b>Average</b>	3,0	3,2	3,0	3,3	2,7	2,7	2,7	2,7	3,0	12,5	23,5	Medium

$$D=3,1/5 \qquad I=2,8/5$$

- The most problematic components are the **mechanisms for grievances and complaints**, which lack transparency, accountability and, above all, horizontal control.
- The programme has failed to adopt regulations governing the correct application of protocol on payment handling, while the staff responsible for the latter are not receiving adequate training.
- Exit procedures are not well defined: there are no graduation mechanisms, no systems for issuing notices or warnings to beneficiaries and no clear mechanism by which beneficiaries are informed that they are to be removed from the programme.
- Overall, the programme suffers from a lack of information and accessibility and is not well adapted to cultural, linguistic and gender factors.

**Table 15.**

Integrity of programme actor relationships: Guatemala

RELATIONSHIP	STAKEHOLDERS		TRANSP	ACCOUNT	CONTR H	CONTR V	
			Score	Score	Score	Score	
MG1	Former beneficiaries, not included people	Community leaders : trustees / town councillor	1	1	1	2	<b>5</b>
MG2	Community leaders : trustees / Con	Local facilitator MIDES	1	1	1	1	<b>4</b>
MG3	Local facilitator MIDES	Departmental Coordinator MIDES	1	2	3	2	<b>8</b>
MG4	Departmental Coordinator MIDES	MIDES Headquarters	1	3	3	2	<b>9</b>
MG5	MIDES Headquarters	Departmental Coordinator MIDES	1	3	3	2	<b>9</b>
MG6	Departmental Coordinator MIDES	Local facilitator MIDES	1	2	3	2	<b>8</b>
MG7	Local facilitator MIDES	Community leaders : trustees / town councillor	1	1	1	1	<b>4</b>
MG8	Líderes comunitarios: Síndico/ Con	Former beneficiaries, not included people	1	1	1	1	<b>4</b>
MG9	Beneficiaries	Community leaders : COCODE	1	1	1	2	<b>5</b>
MG10	Beneficiaries	Mayor	1	1	1	2	<b>5</b>
<b>Total average</b>			<b>1,00</b>	<b>1,60</b>	<b>1,80</b>	<b>1,70</b>	

- **Community leaders** are the most risk-prone stakeholders, in their contact with both CCTP facilitators and with former beneficiaries. **There are no accountability mechanisms** in place for these actor relationships, as they are not regulated by law. Likewise, **there are no known control or monitoring mechanisms involving other state agencies** concerning these particular actor relationships; and neither is there monitoring and assessment of beneficiary admission and exit on the part of non-state third parties.
- The relationship between beneficiaries and local authorities poses integrity risks (5 out of 20), indicating that, in practice, beneficiaries potentially could be denied the right to file requests and raise concerns regarding the programme and to have these requests and concerns answered.
- Analysis shows that all programme relationships exhibit **extremely low levels of transparency**. Meanwhile, accountability, horizontal control and vertical control values do not surpass the 2 out of 5 average, which signals the possibility of serious accountability and oversight issues.
- The most serious problems affecting this programme lie in its **lack of regulation governing procedures**; of mechanisms to assess whether resources (both human and material) are used effectively and efficiently; and of transparency, accountability and control mechanisms.

#### Recommendations:

- **Operating manuals should be introduced** detailing each of the actors involved, their objectives, their responsibilities, expected results, resources necessary for implementation, timeframes and processes of evaluation and sanctions.
- It is important to establish an **official system for handling grievances and complaints**, to avoid the risk that local-level problem resolution is subject to the personal interests of local officials.

## Dominican Republic

The *Solidaridad* programme contributes to poverty reduction in the Dominican Republic, providing support to more than 500,000 families since 2003.

#### Findings:

In the case of Dominican Republic, the programme assessed was given a medium high score for performance and a medium score for integrity mechanisms, and the overall vulnerability level was regarded as medium.

**Table 16.**

Analysis of components based on performance variables and integrity mechanisms: Dominican Republic

	Component	PERFORMANCE (P)					INTEGRITY (I)				PERFORMANCE (P)	INTEGRITY (I)	TOTAL D+I	VULNERABILITY LEVELS
		R	C	F	E	T	A	CH	CV	Total	Total			
1	Admission of households to the programme	5	3	3	3	3	1	4	2	14	10	24	Medium	
2	Emission and delivery of payments	5	3	4	3	4	1	4	2	15	11	26	Medium	
3	Payments compilations	5	4	4	3	1	1	4	2	16	8	24	Medium	
4	Trainings for households	5	3	4	3	1	1	4	2	15	8	23	Medium	
5	Tracking of co-responsibilities	5	3	4	3	1	1	4	2	15	8	23	Medium	
6	Handling of grievances and complaints	5	2	2	3	1	1	4	2	12	8	20	Medium High	
	<b>Average total</b>	<b>5.0</b>	<b>3.0</b>	<b>3.5</b>	<b>3.0</b>	<b>1.8</b>	<b>1.0</b>	<b>4.0</b>	<b>2.0</b>	<b>14.5</b>	<b>8.8</b>	<b>23.3</b>	<b>MEDIUM</b>	





- The data produced regarding **the accountability of all the components raises concerns.**
- Very low levels of accountability were found regarding the **admission of households to the programme**, as well as in the delivery of payments, the tracking of co-responsibilities and the handling of grievances and complaints.
- In large part, beneficiaries receive information verbally via designated community contact persons. However, there is no communication strategy to ensure equal access to information by all citizens.
- At present, there are no known mechanisms available to **civil society organisations for clear and transparent monitoring of the above-mentioned processes.**

The relationship analysis assigned the programme a very low score. Alarming, beneficiary relationships with both the *Entidad Administradora de Subsidios Sociales* (Administration of Social Subsidies), ADESS, and the *Sistema Único de Beneficiarios* (Centralised Beneficiary System), SIUBEN, are completely devoid of even the most minimal transparency and integrity assurances.

**Table 17.**

Integrity of programme stakeholder relationships: Dominican Republic

RELATIONSHIP	STAKEHOLDERS		TRANSP	ACCOUNT	CONTR H	CONTR V	
			Score	Score	Score	Score	
MG1	Beneficiaries	'Solidaridad' programme	4	1	1	1	<b>7</b>
MG2	'Solidaridad' programme	ADESS	1	1	1	1	<b>4</b>
MG3	ADESS	Financial entities	1	1	1	1	<b>4</b>
MG4	'Solidaridad' programme	SIUBEN	1	1	1	1	<b>4</b>
MG5	Beneficiaries	'Solidaridad' programme	1	1	1	1	<b>4</b>
MG6	'Solidaridad' programme	SIUBEN	1	1	1	1	<b>4</b>
MG7							
<b>Average Total</b>			<b>1,50</b>	<b>1,00</b>	<b>1,00</b>	<b>1,00</b>	

- Power relations among actors are particularly weak insofar as, for example, horizontal control systems have not been institutionalised.
- Testimonies which were received indicate a clear trend of programme benefits being directed towards supporters of the governing party (most beneficiaries have ties to the ruling party and therefore have privileged access to the system).
- There is a lack of security and oversight measures to ensure that the cards that allow beneficiaries to collect their subsidy are used exclusively by the named card-holder.

Recommendations:

- There is a pressing necessity to depoliticise the Solidaridad programme: with cooperation from the government, measures must be taken to ensure that benefits are given to recipients based on fulfilment of criteria specified by law, **rather than on party membership**.
- A core aspect of the programme's reform will be to create **Puntos Solidarios**, through which programme users can manage their account via a more secure and more transparent tele-administration system.

## Honduras

The presidential programme for health, education and nutrition, *Bono 10,000*, established that each selected family would receive 10,000 lempiras (US\$513) per year, made in quarterly payments, provided that they meet certain health and education-related co-responsibilities.

Findings:

**Table 18.**

Analysis of components based on performance variables and integrity mechanisms: Honduras

	Component	PERFORMANCE (P)				INTEGRITY (I)				PERFORMANCE	INTEGRITY (I)	TOTAL D+I	VULNERABILITY LEVELS
		R	C	F	E	T	A	CH	CV	Total	Total		
1	Targeting	4	4	3	3	1	3	4	2	14	10	24	Medium
2	Co-responsibilities	3	3	2	2	1	3	2	2	10	8	18	Medium High
3	Money transfers	3	4	3	3	2	3	4	2	13	11	24	Medium
4	Monitoring and evaluation	2	2	1	1	1	1	1	1	6	4	10	High
5	Grievances and complaints system	4	2	1	1	1	1	3	1	8	6	14	Medium High
6	Beneficiaries inclusion	4	2	3	3	1	1	2	1	12	5	17	Medium High
	<b>Average Total</b>	3.3	3	2.2	2	1	2	2.7	1.5	10.5	7.3	17.8	Medium High



D= 3/5

I= 2/5

- **Weaknesses and vulnerabilities** have been found in the **monitoring and assessment** components (where there are no clear success indicators) and in the **grievances and complaints** system (the state does not address citizens' petitions).
- The **co-responsibility tracking** component **demonstrates weaknesses**. Even though beneficiary compliance with co-responsibilities is documented at the local level, this information seems not to be retained in subsequent stages. This means that, in practice, people who no longer comply with the conditions continue to receive the subsidy, whereas in other cases the subsidy is not received in spite of people's compliance with the conditions.

**Table 19.**  
Integrity of programme stakeholder relationships: Honduras

RELATIONSHIP	STAKEHOLDERS		TRANSP	ACCOUNT	CONTR H	CONTR V	
			Score	Score	Score	Score	
MG1	Households	Health	1	1	3	1	6
MG2	Households	Education	1	1	3	1	6
MG3	Community school Committee	Household	3	1	3	3	10
MG4	Mother leaders	Household	1	1	3	3	8
MG5	Education	PRAF	3	1	3	1	8
MG6	Health	PRAF	3	1	3	1	8
MG7	PRAF	Secretariat of the Presidency	1	1	3	1	6
MG8	Secretariat of the Presidency	Secretariat of Social Development	1	1	3	1	6
MG9	Secretariat of the Presidency	Financing entity	1	1	3	1	6
<b>Total average</b>			<b>1.7</b>	<b>1</b>	<b>3</b>	<b>1.4</b>	

- It can immediately be seen that the relationship analysis, represented in the above table, evidences an **almost total absence of accountability** in all the relationships examined. It is striking that no accountability system exists with participation from civil society organisations, and that there are no mechanisms for the disclosure of results and performance assessments on the part of the institutions involved.
- As shown in the analysis of structural vulnerabilities, the Secretariats of Health and Education, which verify and monitor co-responsibilities, have a critical role in the operation of the programme. This finding is reflected in the relationship analysis, which signals an absolute lack of transparency when it comes to establishing if households are complying with their co-responsibilities.
- Similarly, the integrity of **the relationship between the Secretariat of the Presidency and the financing entity** is highly vulnerable. In the case of Bono 10,000, the primary financing entities are the Inter-American Development Bank (IADB), the World Bank and the Central American Bank for Economic Integration, which do not make information accessible to beneficiaries or the general public.

#### Recommendations:

- The Health and Education Ministries need to strengthen the **assessment model** used to track beneficiary compliance with co-responsibilities, while also addressing the current shortage of trained personnel available to perform these assessments.

## Peru

The *Programa Nacional de Apoyo Directo a los Más Pobres* (National Programme for Direct Support to the Poorest), JUNTOS, created by Presidential Decree in April 2005, consists of direct transfers made to the poorest rural and urban households. Since January 2012 JUNTOS has been under the aegis of the Ministerio de Inclusión Social (Ministry of Social Inclusion), MIDIS, in collaboration with the Ministries of Education and Health, which participate in joint initiatives to promote and monitor the programme objectives.

#### Findings:

**Table 20.**

Analysis of components based on performance variables and integrity mechanisms: Peru\*

	Phase	PERFORMANCE (P)			INTEGRITY (I)			PERFORMANCE (P)	INTEGRITY (I)	TOTAL D+I	VULNERABILITY
		(C)	(E)	(F)	(R)	(A)	(P)	Total	Total		
1	Targeting	2	5	4	5	2	4	11	11	22	Medium low
2	Household inclusion	4	4	3	5	4	4	11	13	24	Medium low
3	Co-responsibilities	2	3	2	3	2	4	7	9	16	Medium
4	Transfer money incentives	5	4	3	4	3	4	12	11	23	Medium low
5	Average	3.3	4.0	3.0	4.3	2.8	4.0	10.3	11.0	21.3	Medium low

\*Data and indicators from the EELA I project

- With regard to **targeting**, there are reportedly “leakages” in the criteria and mechanisms for programme admission and exit. For example, in 2012, the Minister of Development and Social Inclusion recognized that there have been cases of people being registered in the system that did not meet the criteria and of officials who gathered information incorrectly or improperly register their relatives as beneficiaries.<sup>23</sup> This raises concerns over the activities of the Sistema de Focalización de Hogares (System for Household Targeting), SISFOH, regarding the monitoring of programme coordinators and concerns regarding community-level monitoring.
- As for **co-responsibilities**, there are frequent complaints regarding the implementation of sanctions for non-compliance, which consist in the suspension of the bimonthly payment, fuelling discontent and distrust.
- It is worth highlighting that **there is no effective and reliable system in place to monitor either beneficiary compliance with co-responsibilities** or the application of sanctions.
- Cases of mismanagement and/or irregularities in the programme implementation, which involve various groups of actors (administrators, coordinators and also beneficiaries) increase risks of corrupt behaviours. The most problems identified by this country assessment are those associated with **staff recruitment and with political proselytising**.<sup>24</sup>

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<sup>23</sup> <http://www.andina.com.pe/agencia/noticia-buscan-mecanismos-para-evitar-filtraciones-programas-sociales-426040.aspx>

<sup>24</sup> <http://www.midis.gob.pe/index.php/es/component/content/article/108-transparencia/noticias/1230-midis-y-defensoria-del-pueblo-presentan-resultados-de-campana-para-evitar-uso-politico-de-los-programas-sociales>



**Table 21.**Integrity of programme actor relationships: Peru<sup>25</sup>

RELATIONSHIP			VALUATION			
RELATIONSHIP	STAKEHOLDERS		REGLAM	ACCOUNT	PARTICIP	
MG1	Unidad gerencia JUNTOS	Sectors (Ministry of Education and Ministry of Health)	1	3	1	<b>1.7</b>
MG2	Unidad gerencia JUNTOS	Regional Government and its Health and Education Directorates	1	2	1	<b>1.3</b>
MG3	CTZ / GeL	Health networks and EESS / UGEL e IIEE	1	2	1	<b>1.3</b>
MG4	EECC	CTR	2	2	1	<b>1.7</b>
MG5	JER	Regional technical team: Regional technical coordinator (CTR) / Technical zone coordinator /Local managers (GL)	2	1	2	<b>1.7</b>
MG6	EECC	Regional team administrator	2	2	2	<b>2</b>
MG9	GeL	Health centres (EESS) / Educational institutions (IIEE)	1	1	1	<b>1</b>
MG10	Local manager Juntos	Beneficiaries	1	2	2	<b>1.7</b>
MG13	GeL	Regional administrator	2	2	1	<b>1.7</b>
MG14	Management unit JUNTOS	Administrator / GeL / EESS / IIEE	2	2	1	<b>1.7</b>
MG15	EESS	Beneficiaries	2	2	2	<b>2</b>
MG16	IIEE	Beneficiaries	3	1	1	<b>1.7</b>

<sup>25</sup> This information has been collected through the EELA I project, which did not use two separate indicators for vertical and horizontal control, but instead a single indicator for “participation”. In fact, the guiding questions for the analysis of participation are very similar to those used to assess oversight in EELA II.

MG17	Leader mothers	Beneficiaries	1	3	2	<b>2</b>
MG18	Beneficiaries	Administration	1	2	1	<b>1.3</b>
MG19	Local monitoring and transparency committee (CLST)	EESS / IIEE	2	2	1	<b>1.7</b>
MG21	M&E team(UGPPE)	Regional team – Head of regional teams	1	2	2	<b>1.7</b>
MG22	GI	CTR	2	2	1	<b>1.7</b>
MG23	CTR / JER	Management unit JUNTOS	3	2	1	<b>2</b>
MG24	CTR	UGOCES	1	1	1	<b>1</b>
MG25	EECC	Head of regional teams (JER)	2	2	1	<b>1.7</b>
MG26	Liaison team and co-responsibilities compliance (EECC) - UGOCES	DEA / Operational management unit for inclusion and exits (UGOAL)	2	2	2	<b>2</b>
MG27	Local monitoring and transparency committee	Monitoring and transparency regional authorities / CNST	2	2	2	<b>2</b>
MG28	CNST	Juntos Board	1	1	2	<b>1.3</b>
<b>Total Average</b>			<b>1.5</b>	<b>2</b>	<b>1.3</b>	

Among the relationships which pose a risk are those associated with the monitoring of co-responsibilities – in other words, with beneficiary **relationships with education and health institutions**. These relationships are not subject to mechanisms of accountability or user participation, and this correlates with the process analysis, which ranked **co-responsibility as the most vulnerable component**.

Recommendations:

- We consider it fundamental to ensure that the Juntos programme is **free from the influence of politically-driven conditions of access, especially during local elections. Citizen oversight must be strengthened** to prevent Juntos from being used as a tool of political clientelism.

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