

Integrity in Humanitarian Assistance: Issues and Benchmarks*

Shahzada M Akram, Tanvir Mahmud, Iftekharuzzaman**

I. INTRODUCTION

In the backdrop of the devastating cyclonic storm “Sidr” that hit the coastal areas of Bangladesh on November 15, 2007, humanitarian assistance has occupied top priority of the government, development partners, non-government organizations, private organizations and individuals. As the situation demanded, a large number of institutions, agencies, organizations and individuals within and outside the government have been involved in providing humanitarian assistance of various types.

The Government, assisted by the Armed Forces Division, is leading the operation with the help of the local administration, non-governmental organizations, local communities and international organizations. Public contribution to the Chief Adviser’s Relief Fund which is this time being complemented with contributions collected by the Chief of the Army, together with bilateral, multilateral and international development partners are the main sources of funds for these relief operations. As usual, in keeping with the Bangladeshi tradition of caring and sharing, many benevolent individuals and groups of citizens have joined the assistance programme with great commitment and spontaneity.

Natural disasters are frequent visitors to Bangladesh, which has developed highly credible and efficient disaster management capacity both within the Government and beyond. Indeed disaster management is one area of public life in which collaboration between the Government, non-government and other stakeholders has been commendable in the whole range of disaster management operations starting from early warning, preparedness, emergency relief through rehabilitation and reconstruction. Much less focus has, however, been devoted to issues of integrity in the process of humanitarian assistance in the context of natural disaster, nor has any considerable effort been made to mainstream tools and measures of transparency and accountability in the abiding system of humanitarian assistance for relief and rehabilitation.

In this context, the aim of this paper is to identify the issues of integrity in humanitarian assistance, and to discuss possible benchmarks and standards in ensuring transparency and accountability in the same. The main objective is to sensitize various stakeholders about the entry points of possible integrity lapse, and to engage in a process leading to the reduction and control or corruption by promoting transparency and accountability in this highly sensitive sector.

The paper draws on the findings of a survey conducted by Transparency International Bangladesh (TIB) in 2005 as a part of the global study Transparency International study on *Corruption Risks in Humanitarian Assistance* in 2005, field visit reports of six TIB teams that went

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** Shahzada M Akram, Tanvir Mahmud and Iftekharuzzaman are working with TIB as Senior Research Officer, Research Officer and Executive Director, respectively. The authors acknowledge excellent support and contribution from their colleagues Zakir Hossain Khan, Rezaul Karim, Akter Hossain, Shahidul Islam, Neena Shamsun Nahar, and Khairul Bari in connection with this paper.

for relief activities immediately after the cyclone,¹ interviews with concerned government authorities, reports published by the Government of Bangladesh and international agencies, non-government organizations, website materials, and reports published in the media. It has also benefited from similar studies conducted by Transparency International in the wake of December 2004 Tsunami in the Asia-Pacific region, in Sri Lanka and Indonesia in particular, and experiences from earthquakes in northern Pakistan and Gujarat in India in 2005 and 2001 respectively.

It should be noted that while the paper deals with the scope and risk of possible corruption, misuse and pilferage in post-Sidr humanitarian assistance operations on the basis of field observations, key-informant interviews and secondary reports, it provides no specific measure of corruption. Such reporting on corruption would require much detailed survey and research in the weeks and months ahead in post-emergency situation, when much greater resources will be involved.

II. THE CYCLONIC STORM ‘SIDR’

Bangladesh’s geographic location has made the country vulnerable to natural and environmental disasters to an extent unmatched by very few others in the world. The flat and low alluvial land with an average elevation of only 10 meters is visited almost every year more than once by huge floods caused by a combination of heavy rainfall with swelling of some of the mightiest rivers originating in the Himalayas. On the other hand, a concave coastline renders Bangladesh extremely vulnerable to the natural phenomena originating in the Bay of Bengal. Cyclones, tidal waves and tornadoes cause catastrophic deaths, damage and destruction constituting a constant challenge to human security and development in Bangladesh. The whole country is affected, but the coastal region is more vulnerable especially to cyclones and tidal waves originating in the Bay of Bengal. Most of the problems have their regional and international dimensions, especially the implications of incessant global warming, which have rendered the nature, frequency and intensity much more erratic and unpredictable than ever before. What is clear and certain is the highly destructive character of Bangladesh’s natural disasters to be addressed not only domestically, but also often to a greater extent regionally and internationally.

The year 2007 has been no exception. Two rounds of floods hit the country from late July to September, affecting 46 districts, with death toll rising to over 1000 people. About 10 million people were affected while crops worth 86 million dollars were damaged.² Much before the country could recover from the floods, on 15 November 2007 the cyclonic storm called ‘Sidr’ ravaged the southwestern districts of Bangladesh. The storm arrived as a category-4 super cyclone with a peak wind-speed at 250 kms per hour. Nine districts of Khulna and Barisal divisions were most severely affected, while another 21 were moderately affected. The cyclone caused widespread deaths and devastation of livelihoods for millions of people in large part of the country.³ The number of deaths, injured and missing people rose to 3,347, 55,282 and 871 respectively. The total number of affected population is 8.9 million in 30 districts. The infrastructure of the region has been shattered.⁴

¹ The Transparency International survey was conducted in 10 countries including Bangladesh in 2006 for mapping corruption in humanitarian action. See, Transparency International, Humanitarian Policy Group and U4, “Mapping Risks of Corruption in Humanitarian Action”, July 2006. Field observations were collected from Sidr-affected areas of Barisal, Jhalakathi, Pirojpur, Bagerhat, Madaripur and Chandpur during the relief operations carried out in November 2007. The relief operation team was comprised of Rezaul Karim, Akter Hossain, Mobidur Rahman, Jamila Bupasha, S S Bakht Hindole, Sumona Sultana Mahmud, Jamal Hossain, Ashraf Hossain, Taufique Mohiuddin, Sayeed Al Russell, Uzzal Bhattacharjee, Meftah Uddin Ahmed and Saif Uddin Ahmed.

² *The Daily Star*, 13 December 2007.

³ Agriculture Advisor of the Caretaker Government in press conference, Dhaka, 1 December 2007. According to him the cyclone damaged 5.53 lac hectares of land and crops worth about Tk 2,000 crore. The damage of the shrimp farms are likely to be around Tk 200 crore to Tk 250 crore. The number of livestock killed was about 1.8 million. A number of 4,231 educational institutes were fully damaged and 12,723 partially affected. About 4.1 million trees were damaged (see Annex 1 for details).

⁴ Most of the tube-wells and other sources of safe drinking water were affected. Other infrastructural facilities such as electricity, telecommunications, roads and highways, and ferry services were totally disrupted due to the cyclone.

Source: Government of Bangladesh: The Disaster Management Information Centre.

Estimates of Loss and Impacts

The two rounds of floods and the cyclone Sidr have been estimated to have caused a total economic loss of \$3 billion, or Taka 21,000 crore.⁵ Centre for Policy Dialogue estimated a collective loss of 1.1 million tons in rice production as a consequences of the floods and Sidr, equivalent to Tk 26,000 crore (about US\$ 3.7 billion).⁶ Specific and comprehensive assessment of loss is always difficult to ascertain because of the multi-dimensional affects of the disaster such as:

- Loss of life and injury
- Damage and destruction of property
- Damage and destruction of crops (subsistence and cash)
- Disruption to production and economic loss
- Disruption of lifestyle and loss of livelihood
- Disruption and damage to essential services, and infrastructure including vital sectors like education, health, local government, etc.
- Health risks and spread of diseases
- Psycho-social effects

Impact of disaster being so pervasive, especially when it is a cyclonic storm like the Sidr, because of the speed and severity involved, the response demands extraordinary measures, with or without international support, much of which takes place as humanitarian assistance. The scope and range of actions in such assistance is wide, and includes:

- Search and rescue;
- Clearance of debris including due management of the dead bodies and care of the wounded victims;
- Emergency provision of food, shelter, clothing, health and sanitation measures, water supplies, and financial assistance;
- Mobilization, distribution/disbursements and management of emergency funds and supplies;
- Emergency restoration of transportation and communication including roads, bridges, culverts, ports, telecommunications, and other key infrastructure installations such as water and power;
- Outreach and communication especially in difficult-to-access-areas;
- Rehabilitation and reconstruction of essential services, such as communications, water and power;
- Survey, assessment and report on effects;
- Rehabilitation of cultivation, production and other aspects of subsistence and livelihood;
- Rebuilding and reconstruction programs;
- Uplift of public morale, including counseling of victims and relatives; and
- Measures for long term recovery – linking humanitarian assistance to development.

The obvious implication of this wide range of tasks is that huge amounts of resources - financial, manpower and technical - become involved, national and international, which opens up opportunities for misuse and corruption – the more are the resources involved, the more is the possibilities of corruption, especially when institutions for accountability do not work effectively.

Need Assessment & Response

The cyclonic storm Sidr is viewed to be one of the worst natural disasters the Bangladesh has ever experienced. Estimates of loss are only coming in and for obvious reasons changing frequently. According to the Government's estimate available as on 13 December, the country

⁵ According to the World Bank, reported in *Jugantor*, 17 December 2007.

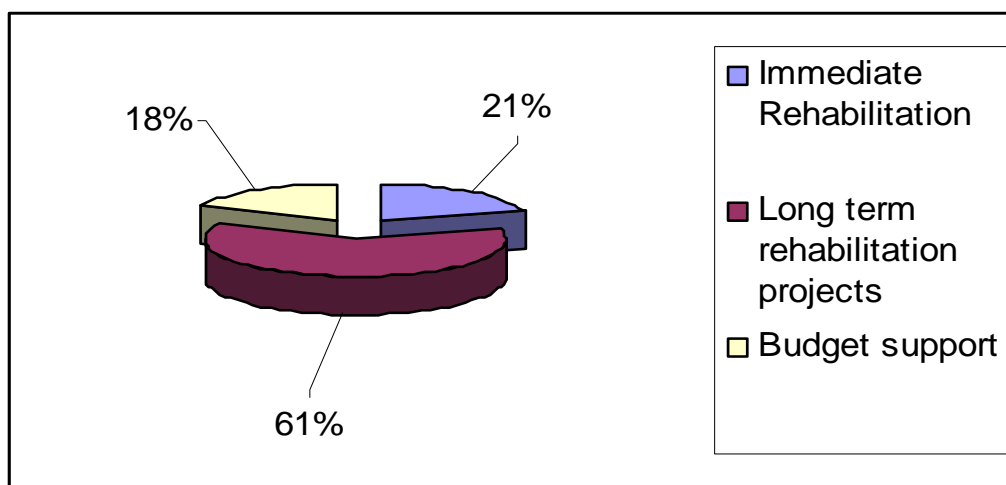
⁶ *The New Nation*, 12 December 2007. This was disclosed in a joint survey report titled 'Post-Sidr Agriculture Rehabilitation' conducted by the Center for Policy Dialogue (CPD) and BRAC.

needs \$2.2 billion for rehabilitation projects and budgetary support. It has also been estimated by the Government that as a consequence of Sidr GDP growth in 2008 will suffer by a drop of one percentage point from estimated 7 percent to 6 percent, while inflation will be higher by one percent from 6.5 percent to 7.5 percent.⁷ The agriculture and forest sectors will experience a 0.9 percentage point drop in growth from estimated 3.4 percent to 2.3 percent, whereas, the industries sector will experience a huge fall of 3.2 percent from 11.3 to 8.1 percent, and fisheries growth may also drop by one percent.

This need assessment was based on estimates of the budgetary effects of floods and cyclone, economic damage to infrastructure and the expected cost of recovery, and the food situation in the country. The estimate took as yardstick the appeal by the Chief Adviser who, earlier on December 3, 2007 sought \$1 billion assistance for the massive funds required for long-term rehabilitation programmes such as building cyclone shelters, embankments, roads, and educational institutions.⁸

Out of the newly estimated \$2.2 billion, \$1.8 billion was assessed as needed for both immediate and long-term relief and rehabilitation programmes in the cyclone-hit areas, of which \$457 million for immediate rehabilitation and \$1351.09 million for long-term rehabilitation projects. Additional \$400 million was sought as budget support.

Government Estimate for Funds needed for Immediate and Long-term Relief and Rehabilitation (\$2.2 billion)

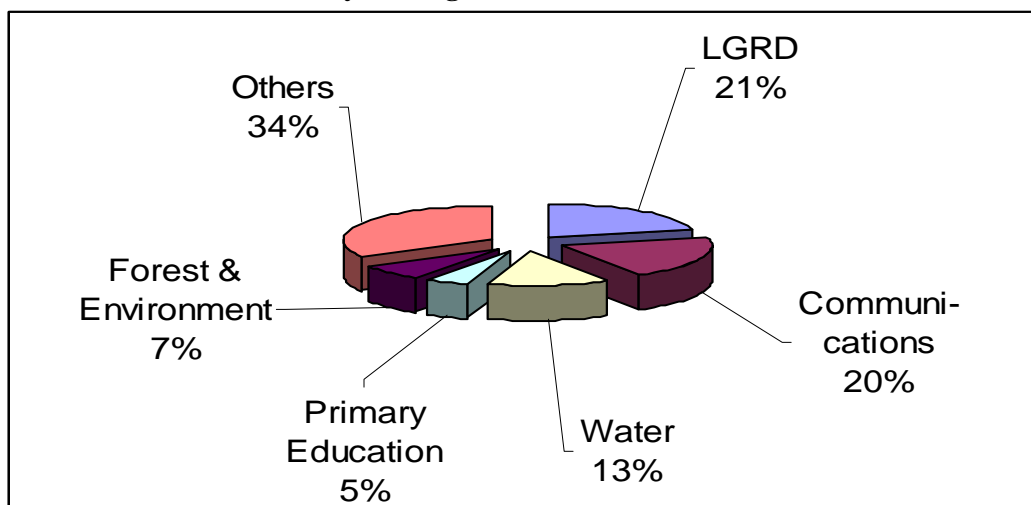


Ministry of Local Government, Rural Development and Co-operatives has sought the highest amount of \$460.82 million while the Ministry of Communications \$447.38 million. Among other ministries, water resources ministry has requested \$294.30 million, primary and mass education ministry \$106.27 million, environment and forest \$163.03, health and family welfare \$10.32 million, food and disaster management \$25.71 million, and home ministry has asked for \$7.29 million. Ministry of Shipping has sought \$3.42 million, energy and mineral resources ministry \$16.92 million and fisheries and livestock ministry sought \$24.29 million for rehabilitation programmes. The Ministry of Disaster Management and Relief is charged with the responsibility to implement relief works in the public sector, as well as to coordinate and regulate the same.

⁷ Briefing by the Government to the Local Consultative Group (LCG) development partners, at a meeting held in Dhaka on 12 December, 2007. Quoted in *The Daily Star*, December 13, 2007.

⁸ The estimate then included \$300 million for rebuilding road networks, \$200 million for 2000 new cyclone shelters, \$250 million for repairing and making new embankments, \$150 million for forestation of the Sundarbans, and \$100 million for rebuilding schools in order to meet the Millennium Development Goals (MDG). *The Daily Star*, December 4, 2007.

Need Assessments by leading ministries (US\$ 2.2 billion)



As of 12 December, 2007, the government allocated approximately \$25 million from the Chief Advisor's relief and welfare fund, Directorate of Relief and Rehabilitation (DRR) & MoFDM for the Sidr affected people.⁹ Apart from these, the government declared that it will feed the severely affected population for six months, provide seeds, fertilizers and irrigation to the affected farmers under three-phase rehabilitation programs.¹⁰ Following the cyclone, the government declared bringing all 'Sidr' affected families under the net of Vulnerable Group Feeding (VGF) - one person from each affected family will be eligible for VGF card.¹¹

In response to the government appeal, different countries and donor agencies are making commitments of humanitarian assistance. Within a few weeks of the cyclone, Bangladesh received over US\$ 200 million aid from different countries (Annex 3), while other much bigger commitments were expected to follow. A large number of local and international non-government organizations, individuals and the business community has made financial contributions and launched relief operation along with the government, donors and international organizations. On 11 December 2007, it was decided at a meeting of Micro-Credit Regulatory Authority (MCRA), working under Bangladesh Bank with the NGOs and micro-finance institutions (MFIs), that NGOs and MFIs will suspend the collection of monthly installment of their loans in the cyclone-affected areas for next three to six months. The NGOs and MFIs also announced fresh lending plans for the areas.¹² BRAC, the largest NGO, for instance, undertook a large relief operation under its package program.¹³

⁹ Ministry of Food and Disaster Management, DMIC, DMB of GoB, 12 December 2007. The government also allocated 16,890 MT GR rice, distributed 27,000 food bags, 66,700 blankets, 16,454 tents, 3,348 carton utensils, and 13,000 bundles of corrugated iron sheets.

¹⁰ *The Daily Star*, 5 December 2007.

¹¹ *Daily Prothom Alo*, 5 December 2007.

¹² *The Daily Star*, 12 December 2007. Quoting Director of Federation of NGOs in Bangladesh (FNB) it was reported that the NGOs wanted to send their staff members to the cyclone-affected areas to resume loan-disbursement program. But it should not mean that they were going to collect the loan installments. "First we'll identify the really affected people and then suspend the collection of monthly installment", said Mr. Tajul Islam, adding that in the vacuum that may be created for NGOs suspending micro-credit local private creditors (Mohajans) would be active in the affected areas. Hence there was an urgency for NGOs to resume micro-credit operations in the affected areas, he added.

¹³ Ministry of Food and Disaster Management (MoFDM), Relief Control Cell (RCC), 12 December 2007. The first phase package that was distributed among 44,392 households included rice 10 kg, lentil 2 kg., potato 2 kg, oil 250 ml, salt 1 kg, biscuit 2 pkt, match 2 box. A package of 1 kg *chira* was distributed among 33,274 households as immediate response after the cyclone during 16-17 November 2007.

III. CHALLENGES OF INTEGRITY IN HUMANITARIAN ASSISTANCE

Humanitarian assistance in post-natural disaster situations is particularly vulnerable to corruption. Sudden flow of large amounts of money, goods and services, from home and abroad, coupled with the need to deliver aid quickly, contributes to the risks of corruption. The post-emergency rehabilitation and reconstruction phase creates substantial economic and business opportunities which also make room for corruption.

Three main reasons can be attributed to this vulnerability. Firstly, although the amount of resource flow in the form of humanitarian assistance can never match the actual loss, the amount is usually very large compared to the absorption capacity particularly in the short span of time in which assistance have to take place. Secondly, because of the urgency involved, the conventional tools and institutions of accountability often tend to be undermined creating scope of abuse and corruption. Thirdly, like most other programmes of support for the needy, humanitarian assistance is featured by asymmetric power relations at all levels between the assistance provider and the intended recipient or beneficiary. In case of disaster-related humanitarian assistance this asymmetry is much more pronounced, with heavy bias against the recipient. This not only restricts the scope of participation in decision or choice at the receiving end, but also creates a denial syndrome preventing disclosure and discourse on corruption and financial mismanagement. The key concern happens to be that information on humanitarian assistance lost to corruption and integrity lapse may result in loss or reduction of flow of funds, and therefore, loss of opportunities and income.

The corruption-risk mapping survey, mentioned earlier, found that in a context where corruption is pervasive, the risk and prevalence of integrity lapse in humanitarian assistance is quite high. Loss of relief funds and other resources is a common problem, easily attributable to weak and ineffective functioning of the national integrity system. The exact estimate of corruption-related loss of resources for humanitarian assistance is not available, but it is widely believed that the proportion of funds reaching the real victims of disasters is very low, with a substantial portion lost to corrupt officials and other actors in positions of power in and outside the government at various levels.¹⁴ Corruption in humanitarian assistance takes place with a complex network of public representatives, political leaders and their agents, government officials at various levels, police and local elites. A national household survey conducted by TI-Bangladesh in 2005 found that 15 percent of the respondents were enlisted recipients of one or other form of relief distributed by the government. Nearly 55 percent of them complained that they received less than the allocated amount. More than 72 percent of those victimized by corruption in the relief disbursement process were in the category of daily income of less than \$2.¹⁵

In most cases, distribution of relief goods is done either by the local government (*Union Parishad*) or by NGOs. *Union Parishad* authorities (chairmen and members) are perceived to engage in grabbing a portion of the relief goods for distributing to areas where they have supporters and possible vote banks. When relief is distributed in kind, in some cases recipients are given less than they are entitled to. However, it is also not unusual for *Union Parishad* authorities to receive less than the allocated amount. Often warehouse, distribution and transport costs are not covered, which have to be compensated for by selling some of the relief goods.¹⁶ Political influence and the intervention of local members of parliament and Chairmen of *Union Parishad* is another risk factor. Some respondents described a network among local government representatives, MPs and ministers in rent-seeking, sometimes in the form of coercion.

¹⁴ According to the findings of a survey conducted by TIB as a part of the Transparency International study on *Corruption Risks in Humanitarian Assistance* in 2005. This survey was conducted in 10 developing countries of Asia and Africa.

¹⁵ Transparency International Bangladesh, *Corruption in Bangladesh: A Household Survey 2005*.

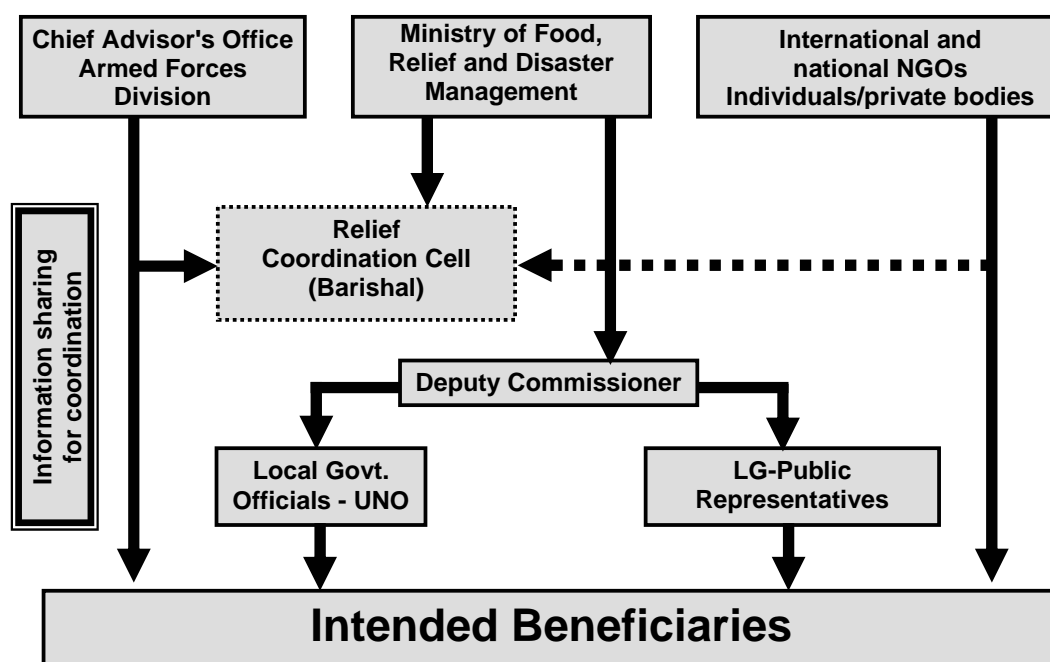
¹⁶ *Mapping the Risks of Corruption in Humanitarian Action*, July 2006, by Transparency International and U4 Anti-Corruption Resource Centre, pp. 20.

As earlier mentioned, the post-Sidr relief operations are being implemented and coordinated by the Ministry of Food, Relief and Disaster Management with the help of the Armed Forces. The Armed Forces have been assigned the role of:

- a) overall coordination of the post-Sidr relief operation;
- b) emergency transportation of relief goods;
- c) proper distribution of relief goods among the distressed population in the affected areas;
- d) emergency evacuation;
- e) assist in the rehabilitation programme;
- f) coordination of relief and assistance; and
- g) any other assistance as requested by the government/non-government organizations/agencies.

A special coordinating cell has been established in Barisal. Additional coordination cells have been established in the Armed Forces Division and services headquarters. Daily press briefings are held with the print and electronic media to provide updates of operation and progress.

The relief materials are directly sent to the concerned Deputy Commissioner, who distributes it through the UNO and local government bodies. The money collected under the Chief Adviser's Fund, foreign aid and aid collected by the armed forces are distributed by the armed forces, where public representatives and officials are involved in local levels – Upazila and Union Parishad (See the chart below.). The district administration and armed forces share information between themselves. The NGOs are also supposed to inform the concerned DC before going into relief distribution to facilitate coordination and avoid overlaps. However, it has been observed that in many areas the NGOs do not inform the local administration about their relief programs.



Allegations of nepotism and abuse of power have been raised from different corners regarding distribution of VGF card. According to the media reports, local public representatives like UP members and chairmen with the help of government officials are found to be manipulating the list – the former for political mileage in the next election, and the latter for bribery. It is also alleged that though multiple members of some families may have received VGF cards, a large number of other eligible people failed to be enlisted. A number of public representatives of the *Union Parishads* and their relatives and a few government officials were arrested allegedly for

corruption, especially misappropriation of relief materials. It is also alleged that the victims were threatened of negative consequences by the local representative when they protested against corruption in distribution of relief.¹⁷ Corrupt practices include selling staples for relief in the local market, extortion in rehabilitation project, VGD card manipulation, taking bribe, nepotism in beneficiary selection and so on.¹⁸

Key field-level observations of the relief activities after Sidr

- Lack of proper assessment before disbursing relief
- Lack of coordination among the relief givers
- Lower, if not zero distribution of relief in remote or inaccessible areas¹⁹
- Some affected families over-supplied due to nepotism and lack of coordination and monitoring, while others received none
- The middle class families outside the coverage of relief due to their sense of social embarrassment
- Preference of some NGOs to operate among own members, beneficiaries or coverage areas only
- Relief being manipulated as vote banks by the local government representatives
- Relief materials embezzled by local body members
- Loan disbursement by some NGOs in the name of relief
- Few NGOs allegedly creating pressure for loan recovery²⁰
- Relief materials, especially medicines being sold to local drug stores

Source: Based on observations during the relief operations carried out by TIB staff in last week of November 2007 in the 6 most affected areas.

Key Issues

In view of the above, and on the basis of experiences from similar situations elsewhere in the world, as mentioned earlier, the following issues are raised as matters of concern with regard to maintaining integrity in the humanitarian assistance process.

¹⁷ *The Daily Star*, 11 December 2007; *Daily Jugantor*, December 11, 2007, *Daily Samokal*, 1 December 2007; *Daily Prothom Alo*, 2 December 2007; *Daily Inquilab*, 30 November 2007; *Daily Jugantor*, 26 November 2007. Even the Ministry of Establishment took administrative action against the Director General of Directorate of Relief and Rehabilitation and made him OSD on charge of negligence to provide services (*The News Today*, 4 December 2007). During first week of December 2007, 18 people including UP member, chairman, local businessmen and others were arrested on charge of asset stripping (*Daily Jugantor*, 11 December 2007).

¹⁸ <http://www.e-mela.com/page.php?id=1804> (accessed on 4 December 2007). On 29 November 2007, about 300 agitated people from Dakua and Fulkhali village under Dakua union of Galachipa upazila under Patuakhali district brought out processions after assembling in front of the UNO office compound of Galachipa alleged nepotism, irregularities and corruption in relief distribution. They claimed that UP chairman and members were distributing relief among their supporters only.

¹⁹ Army Chief General Moeen U Ahmed informed that relief goods are distributed in areas where cars or boats have easy access, but far-flung areas remain deprived (*The Daily Star*, 11 December 2007).

²⁰ It has also been alleged subsequently that while at the request of the Government NGOs in general decided to stop collection of installments on micro-credit, in many cases they also stopped issuing new loans to clients who genuinely needed this for resuming economic activities. As a result traditional money lenders came in charging much higher interest. See, *The Daily Star*, 16 December 2007.

1. **Assessment:** Difficulties in proper assessment due to the necessity to respond rapidly lead to exaggerated information or over-estimation and lack of information, knowledge and skills to prioritize.
2. **Selection process of partner organizations:** Because of pressing need for engaging organizations for implementing assistance programmes involving much greater volume of resources than available capacity, selection process may often lack transparency.
3. **Selection of beneficiaries and affected areas:** Irregularities in selection of affected areas and beneficiaries at local level are often guided by vested interests including political interests. Remote and inaccessible places are left out from relief operations. Patronage of influential individuals including public representatives and institutions within or outside the government is often a pre-requisite for becoming eligible for receiving relief.
4. **Procurement and storage of relief materials:** Lack of transparency in the procurement process, and failure to observe of conflict of interest principles encourage people to engage in corrupt practices. Apart from procurement, logistics and payroll are perceived to be vulnerable to the biggest risk of corruption. Other related risk areas are construction of shelter, healthcare, and water and sanitation facilities.
5. **Distribution of relief materials:** Corruption in distribution process includes relief distribution among political supporters, delivery of less than actual entitlement, misappropriation by fake outfits, diverting materials and selling in black market, and distribution of out-dated and inappropriate relief materials, and connivance of various actors in pilferage.
6. **Monitoring of the distribution of relief:** Lack of proper monitoring by stakeholder organizations – lack of internal control, poor financial management affect relief distribution.
7. **Culture of secrecy:** Reluctance to provide unqualified access to information along with the lack of a complaint handling system creates the scope of corruption.

IV. BENCHMARKS FOR INTEGRITY

A set of benchmarks of standards to address the corruption risks in different phases of relief and rehabilitation activities has been presented in a matrix in Annex 1. As earlier mentioned, no rigorous study or investigation has been done yet to assess the losses incurred for integrity lapse and for prevailing corruption. However, concerns have been expressed about massive logistical and coordination challenge,²¹ which are among the most convenient entry points of corruption including financial mismanagement. Incidents have been reported in the media that bring into focus concerns for integrity during the process of humanitarian assistance. The key benchmarks identified in the matrix as indispensable for maintaining integrity in the humanitarian assistance programme are the following:

1. **Transparency in Needs Assessment:** All considerations that inform needs assessment must be made publicly available, including how has assessment been done, who will act, who will be responsible, who will be reporting to and in what process. Operational expenses including carrying, distribution and storage costs must be included in the assessment at all levels.
2. **Coordinated and collective action:** Mechanism must be developed for closer coordination and collective effort by the Government, non-government organizations – national and international, the private sector, donors and media to ensure that humanitarian assistance is not eaten up by corruption. For building greater mutual trust between various stakeholders effective channels of vertical and horizontal communication must be established at various levels.
3. **Disclosure of Information** – Like any other sector, disclosure of information is the primary and indispensable tool for ensuring transparency and effective channeling of resources to affected

²¹ *The Daily Star*, 4 December 2007.

regions and communities. Regularly updatable database must be maintained by all parties involved in humanitarian assistance. The amount of fund committed and disbursed by each donor including names of recipient organizations must be published through various media on a regular basis. For implementing organizations and individuals – government, non-government, and private, it must be made mandatory to reveal the amount of money and materials received including sources/donors, and the amounts disbursed. Public notice-boards and complain boxes can be a helpful deterrence. All units of all implementing organizations must provide contact details of responsible individuals who can provide the necessary information and who can receive complains of grievances. The management of such organizations must also ensure disclosure of information on internal oversight, monitoring and grievance redress mechanism. All actors and stakeholder must develop and implement a comprehensive and harmonized information disclosure system nationally and locally at various levels in easily understandable language and format. Special efforts should be made to engage the media in the whole system of information disclosure.

4. Transparency of Disbursements – Process Tracking: In order ensure transparency and accountability appropriate mechanism should be established to track flow of assistance – financial as well as material from the source through all levels of distribution to intended beneficiaries. The results of such tracking must also be disclosed and regularly updated through various media including public information boards, leaflets, newsletters, newspapers and websites. If properly planned and applied, such tracking systems can be an effective tool for coordination, monitoring and oversight. It is important that such tracking system be developed in a participatory way owned and strictly observed by all stakeholders – government and non-government institutions, private organizations and donors.

5. Monitoring and Evaluation: Indispensable for transparent, accountable and effective humanitarian assistance programme is proper monitoring and evaluation, both internal and external. All involved institutions must develop their own effective internal control system to support external professional auditing and evaluation. All stakeholders should strictly maintain highest possible standards of accounts, and provide regular, timely, transparent, and easily accessible reporting of the flow of assistance and disbursements including all types of expenditures. They should also facilitate and encourage social audit with the participation of the intended beneficiaries.

6. Citizens Participation: Public participation is one of the most important tools to prevent integrity lapse and corruption in humanitarian assistance. As earlier mentioned, the relationship between the humanitarian assistance provider and the intended beneficiary at all levels is asymmetrical. The intended beneficiaries must be made aware that it is their right to receive assistance rather than charity, and it is in the name of their welfare that the whole industry of humanitarian assistance operates. The asymmetric power relation can be challenged only by the proper and complete flow of information and through the provision of easily accessible and well-protected complains handling mechanism. Affected communities need accessible and understandable information about relief and compensation they are entitled to - when, from what sources, in what form and by whom. They should also have the full knowledge on who they can refer to in case of any deviations, and they can do so with full protection of security and dignity. Citizen's Committees for Promoting Integrity in Humanitarian Assistance should be formed at all levels to facilitate people's voice raising and participation, and thereby promote social accountability.

7. Grievance Reporting and Redress Process: Affected individuals should be provided with most conveniently usable grievance reporting mechanism including instances of lapse of integrity and that of corruption, mismanagement, misappropriation, mal-distribution, under-distribution, and any form of bias in operation – political, social, personal – based on gender, religion, ethnicity or any other marker of identity. They must also be protected from any form of retribution or revenge for such grievance with special provision for protection of third party whistleblowers.

8. Capacity Building: Strengthening the capacity of institutions – government and non-government – is critical for ensuring transparency and integrity in humanitarian assistance process. Special emphasis in this respect should be on financial management and internal control systems, managerial accountability, oversight and mechanism to ensure check and balance against unrestricted discretion.

9. Public Service Integrity: Among all the stakeholders involved in humanitarian assistance operations from the national to the grassroots level the most crucial role is played by the public officials. It is absolutely necessary to mainstream integrity and anti-corruption codes and practices in the public service complemented by positive and negative incentives that can deter corruption. With substantially higher amounts of resources to be handled than the normal absorption capacity and in relatively short period of time, no measure of integrity can be effective, if the public officials are tempted to be involved in corrupt practices either for lack of oversight, or for salary and benefits levels that are inconsistent with cost of living. Accordingly, proper balance of rewards and punishments must be institutionalized in order to prevent corruption in humanitarian assistance in a sustainable way.

10. Due Diligence - Code of Ethics and Pledge of Integrity: Finally, due diligence and self-regulation of all actors are fundamentally important to ensure integrity, transparency and accountability in humanitarian assistance. A Humanitarian Assistance Code of Ethics with built-in principles and tools of zero tolerance against corruption should be developed in a participatory process to be strictly applicable and enforceable to all stakeholders and actors involved. As a precondition for any form of involvement in humanitarian assistance, it should be mandatory to make a public pledge of integrity and commitment not to indulge in profiteering or private gain out of humanitarian assistance and to refrain from any form of corruption, to resist it, and to report it.

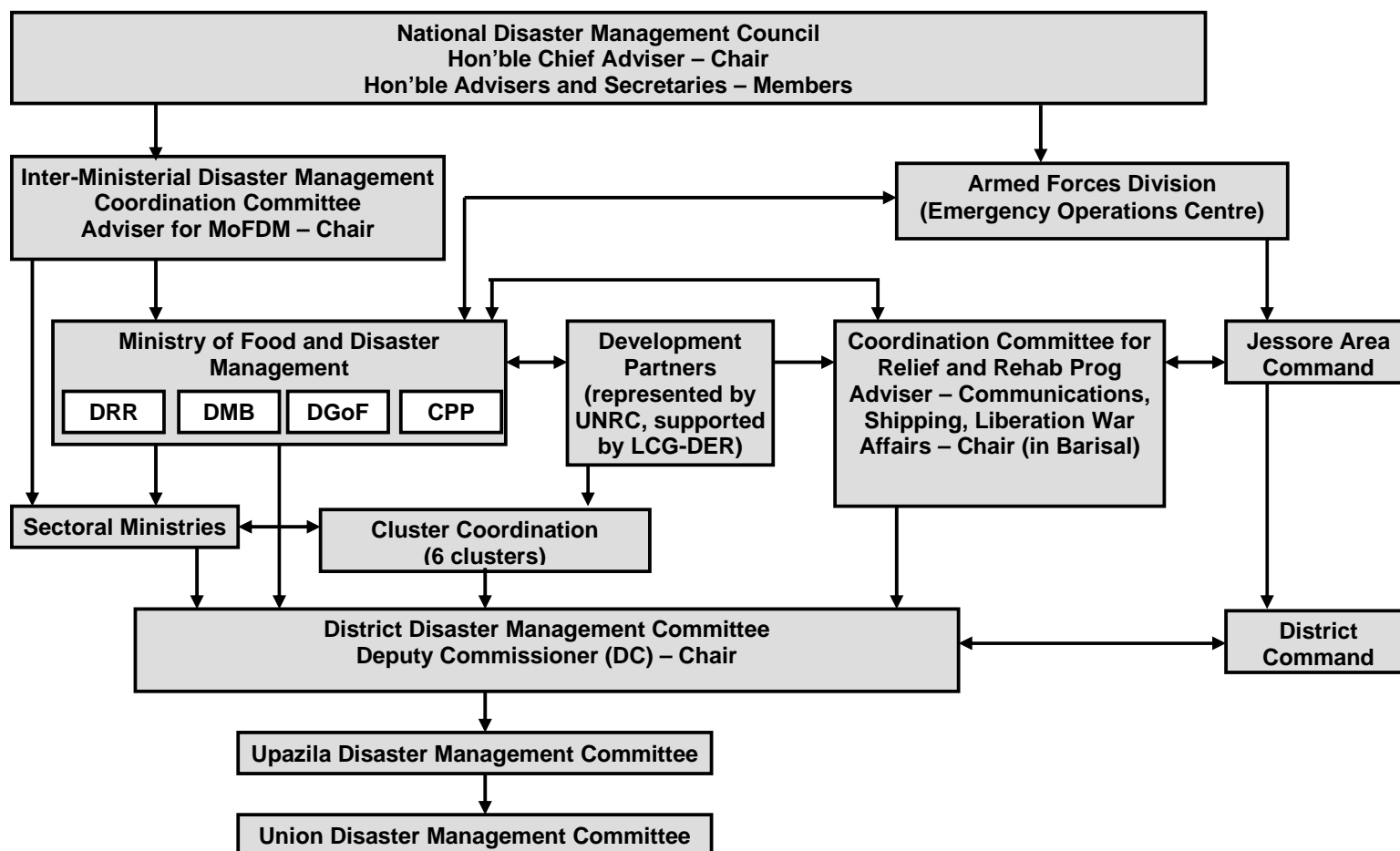
Annex -1: Benchmarks for Maintaining Integrity in the Humanitarian Assistance²²

Activity	Issues / Risks	Benchmark of Standard
I. Initial assessment, decision to respond and program design	<ul style="list-style-type: none"> ▪ Assessment based on subjective factors with little or no consideration of the needs of the affected. ▪ Assessment for political mileage or other vested interests leading to inflate needs and/or to favor specific groups/categories of people at the expense of the genuinely affected ▪ Subjective selection of projects including shape, size or location 	<ul style="list-style-type: none"> ▪ Disclosure of information – all considerations that inform needs assessment must be publicly available, including how has assessment been done, who will act, who will be responsible, who will be reporting to and in what process. ▪ Include in budget operational expenses including carrying costs
II. Fundraising and allocation of funding	<ul style="list-style-type: none"> ▪ Multiple sourcing of funds for the same project or activity, inflated budgets including high overheads ▪ Fake organizations including so-called ‘briefcase NGOs’ 	<ul style="list-style-type: none"> ▪ Coordination among donors and executive agencies and organizations, especially in the same geographic area ▪ Disclosure and sharing of information ▪ Selection of national or local NGOs or other implementing agencies on the basis of credibility with proven financial integrity ▪ Disclosure of detailed contact information including full details of personnel involved in managerial responsibility
III. Working with local organizations	<ul style="list-style-type: none"> ▪ Influencing selection process and biased allocation of resources and materials ▪ Funding of non-existent “partners” 	<ul style="list-style-type: none"> ▪ Coordination among all organizations working in the same area ▪ Sharing of information ▪ Selection of NGOs and other implementing organizations with proven capacity and credibility
IV. Procurement and logistics risks	<ul style="list-style-type: none"> ▪ Violation of procurement regulations ▪ Conflict of interest affecting decisions ▪ Undue preference given to particular bidders/suppliers ▪ Sub-standard, below-specification goods supplied ▪ Diversion of stock, vehicles, parts, fuel 	<ul style="list-style-type: none"> ▪ Ensure implementation of the government procurement rules (PPR 2003/2007) ▪ Open tender procedure ▪ Involve experts/watchdogs on the concerned issue to ensure strong monitoring of specifications ▪ Disclosure of all information regarding procurement ▪ Involve locally credible citizens (teachers and other professionals with integrity), especially youth, in relief distribution process ▪ Ensure participation of local common

²² Based on the summary of corruption mapping presented in the Executive Summary of *Mapping the Risks of Corruption in Humanitarian Action*, July 2006, by Transparency International and U4 Anti-Corruption Resource Centre.

Activity	Issues / Risks	Benchmark of Standard
		people in needs assessment
V. Targeting and registration risks	<ul style="list-style-type: none"> ▪ Illegitimate and biased inclusion on lists ▪ Authorities, elites or staff give preference to individuals or groups because of social connections, obligations or even coercion ▪ Powerful individuals within the community manipulate the beneficiary lists 	<ul style="list-style-type: none"> ▪ Involve locally credible citizens, especially youth, in relief distribution process ▪ Cross-check different lists to avoid exclusion ▪ Coordination of all stakeholders and actors - local administration (DC, UNO), local government body (UP), NGOs, donors, media especially local journalists ▪ Ensure inclusion of disadvantaged and marginalized communities
VI. Implementation and distribution risks	<ul style="list-style-type: none"> ▪ Those involved in the distribution divert assistance for private gain ▪ Extortion of beneficiaries and taxation of relief goods 	<ul style="list-style-type: none"> ▪ Involve locally credible citizens, especially youth, in relief distribution process ▪ Coordination of all stakeholders and actors - local administration (DC, UNO), local government body (UP), NGOs, donors, media especially local journalists ▪ Ensure inclusion of disadvantaged and marginalized communities ▪ Establish and ensure enforcement of complaints handling procedures
VII. Monitoring, reporting and evaluation	<ul style="list-style-type: none"> ▪ False, exaggerated and under-reporting ▪ Favorable reports that hide financial problems 	<ul style="list-style-type: none"> ▪ Disclosure of all information on receipt/raising of funds and other resources and disbursements or expenses incurred on a regular basis with continuous updating as frequently as possible ▪ Audit of all government and non-government programs/projects on humanitarian assistance ▪ Ensure public disclosure of all financial and audit reports
VIII. Finance, administration and human resources	<ul style="list-style-type: none"> ▪ Diversion of humanitarian assistance funds for other purposes ▪ Payroll frauds e.g. employees that don't exist, employees that have left, payroll salary higher than paid up salary 	<ul style="list-style-type: none"> ▪ Disclosure of all information with regular updating ▪ Monitoring and oversight including stricter internal & external audit ▪ Beneficiary participation in audit and reporting <p>Establish Humanitarian Assistance Code of Ethics applicable to all stakeholders and actors starting from a public Pledge of Integrity including commitment not to indulge in profiteering out of humanitarian assistance.</p>

Annex 2: Post-Sidr Relief and Rehabilitation: Flow Chart on Process of Operation
(Source: Armed Forces Division – as on 18 December 2007)



Annex 3: Summary Statistics of Damage due to Cyclone Sidr (as of December 12, 2007)

Sl No	Name of District	No. of affected upazila	No. of Affected Family	No. of Affected People	Damaged Crops (Acre)		Damaged Households		No. of death	No. of injured people	No. of missing people	No. of livestock death	Affected Educational Institute		Damaged Road (km)		Damaged Trees
					Full	Partial	Full	Partial					Full	Partial	Full	Partial	
1	Barisal	10	230085	846076	45275	223563	41470	92242	97	-	-	962	-	4434	-	-	300000
2	Jhalokathhi	4	149202	763211	117308	67908	69685	76108	47	16206	-	91329	345	1239	495	1313	320000
3	Pirojpur	7	192831	1011359	72963	81909	63896	80315	400	1161	511	735411	2061	710	383	1259	750000
4	Borguna	5	217279	843669	227403	83202	95412	96245	1277	16310	26	593571	413	649	614	1294	1000000
5	Bhola	7	28771	147718	22350	148862	15389	20300	42	61	14	7658	665	325	25	87	150000
6	Patuakhali	7	252300	611125	60440	254835	53291	132369	457	8500	221	17184	351	1022	-	838	175000
7	Khulna	9	112476	525616	12464	78292	17323	67011	18	173	-	13652	35	462	11	67	45170
8	Satkhira	7	42862	212133	2858	45460	5293	12245	20	4	1	162	-	149	50	25	35400
9	Bagerhat	9	283482	1221788	58215	237483	118899	130675	810	11428	-	207085	211	1859	60	1174	20000
10	Gopalgang	5	55494	257354	8958	34248	24133	85000	35	20	-	94492	33	555	46	-	17000
11	Madaripur	4	92300	595000	3330	9460	4991	7509	41	119	-	30	37	91	-	-	30444
12	Shariatpur	6	95562	423023	20536	43235	27993	54325	17	1232	-	159	31	480	-	-	776429
13	Faridpur	8	38635	154540	23200	75542	1000	37635	16	-	3	52	-	34	-	-	153300
14	Rajbari	4	755	3775	3200	9359	3789	755	1	-	-	-	-	-	-	-	2000
15	Dhaka	5	3036	15180	-	9114	15	3036	6	2	-	-	-	2	-	-	9000
16	Narayanganj	4	14164	57998	6889	1297	476	5156	12	-	-	153	-	35	-	-	2000
17	Munshiganj	6	21590	102322	3080	6553	2804	5548	8	18	-	-	-	43	-	23	8000
18	Narsingdi	6	60558	306538	2350	34301	24	5280	3	5	-	10802	-	48	-	-	160000
19	Chittagong	5	3759	15295	1976	4989	603	5181	21	-	92	4654	-	9	30	70	1200
20	Cox's Bazar	8	2004	8555	245	1276	40	1499	7	-	-	3	-	9	-	21	1500
21	Noakhali	5	33740	217300	3125	19625	980	2200	1	35	-	250	-	-	-	150	700
22	Feni	6	35	156	87	263	-	30	-	-	-	-	-	-	-	-	450
23	Laxmipur	5	9988	55695	18500	127483	1479	6652	2	1	1	2	-	133	-	-	700
24	Chandpur	8	38133	175579	6550	19301	10342	15443	5	-	-	70	47	286	-	40	81673
25	Comilla	16	14119	70527	2500	30104	806	3412	-	-	-	-	-	98	-	-	1400
26	Jessore	8	55902	223608	103	2008	-	-	1	7	2	-	-	-	-	-	350
27	Narail	3	8592	35024	7615	21656	3629	6177	1	-	-	-	-	48	-	-	750
28	Moulvibazar	3	149	755	-	80	60	89	2	-	-	56	-	-	-	-	850
29	Kishorganj	13	5473	18140	4500	16087	55	2628	-	-	-	765	2	3	-	-	12000
30	Manikganj	7	750	4200	6807	42622	-	-	-	-	-	5	-	-	-	-	10000
	Total	200	2064026	8923259	742827	1730117	563877	955065	3347	55282	871	1778507	4231	12723	1714	6361	4065316

Source: Ministry of Food and Disaster Management (MoFDM), Relief Control Cell (RCC), December,12, 2007.

Annex 4: Foreign Assistance as of November 27, 2007

Country/Agency	Million in US dollar
Saudi Arabia	102.8
UN	15.4
USA	14.5
UK	14.0
Kuwait	10.0
European Commission	9.4
Islamic Relief	8.2
Netherlands	7.2
Japan	4.0
Canada	3.4
Norway	3.4
Australia	2.8
Sweden	2.7
Belgium	2.0
Germany	1.7
Italy	1.5
Spain	1.1
Total	204

Source: UNRC; *Daily Amar Desh*, 30 November 2007.

Annex 5: Relief Activities to Cyclone SIDR Victims by DRR

Sl No.	District	Allocated								Allocation From CA Relief and Welfare Fund
		GR Rice MT	GR Cash BDT	House Building Grant BDT	Others					
					Foods (Bag)	Blanket (pcs.)	Tent (pcs.)	Utensils (Carton)	CL Sheets (Bundle)	
1	2	3	4	5	6	7	8	9	10	11
1	Patuakhali	2740	3800000.00	184500000.00	6500	9230	2676	500	2000	80000000
2	Bagerhat	2450	4297000.00	34500000.00	8000	9230	2775	500	2000	388830000
3	Borguna	2800	3550000.00	31925000.00	6500	9120	2677	500	1500	389660000
4	Jhalokathi	1190	2289000.00	16000000.00	6000	4220	200	0	1000	45000000
5	Pirozpur	2535	4120000.00	181900000.00	0	8900	2366	500	1500	80000000
6	Satkhira	875	1369000.00	10500000.00	0	5000	700	500	500	40000000
7	Barisal	1500	1283000.00	15300000.00	0	4000	710	500	2000	35000000
8	Bhola	350	1050000.00	16000000.00	0	2000	700	0	500	35000000
9	Laxmipur	200	375000.00	0.00	0	1000	300	0	0	10000000
10	Khulna	850	1650000.00	6000000.00	0	3000	350	348	500	32500000
11	Gopalganj	400	250000.00	6000000.00	0	2000	300	0	500	12500000
12	Sariatpur	250	250000.00	6000000.00	0	2000	300	0	500	12500000
13	Madaripur	350	250000.00	6000000.00	0	2000	300	0	500	17500000
14	Faridpur	100	0.00	0.00	0	1000	0	0	0	3000000
15	Munshiganj	100	0.00	0.00	0	0	0	0	0	0
16	Dhaka	0	0.00	0.00	0	0	0	0	0	0
17	Cox'sbazar	0	0.00	0.00	0	1000	600	0	0	0
18	Chittagong	0	0.00	0.00	0	1000	700	0	0	0
19	Chandpur	200	425000.00	0.00	0	1000	350	0	0	0
20	Noakhali	0	0.00	0.00	0	1000	450	0	0	0
Total		16890	24958000	514625000	27000	66700	16454	3348	13000	1181490000

Source: Directorate of Relief and Rehabilitation- DRR; 12 December 2007.

Annex 6: Status of Relief Items at MoFDM Co-ordination Cell, Barisal

Sl. No.	Items	Transported by	Amount (MT)		Distribution (MT)		Present Stock	Remarks
			Previous Stock	Received	location	Amount		
1	Food & Cloth	MV Masud		20	Bagerhat	20	0	
2	Food & Cloth	Patarhat-4		15	Barguna	15	0	
3	Food & Cloth	Saikat-1		15	Patuakhali	15	0	
4	Food & Cloth	Parabat-5		27	Pirojpur	27	0	
5	Food & Cloth	Manoshi-3		10	Barguna	10	0	
Total				87		87	0	

Source: MoFDM Co-ordination Cell, Barisal; 11 December 2007.

Annex 7: Relief Distributed by BRAC

Sl No .	Name of Region	Name of District	No. of Upazila	No. of Branch Office	No. of Union	Total Distribution (H/H)	Cumulative Distribution (H/H)	Cloth (Pices)	Milk (Ltr)
1	Barisal	Barisal	10	69	101	0	10775	0	0
2	Barisal	Bhola	7	29	62	0	2400	0	0
3	Barisal	Jhalokathi	6	22	32	0	7400	10507	0
	Sub-Total		23	120	195	0	20575	10507	0
4	Khulna	Bagerhat	9	32	74	0	39500	107550	8110
5	Khulna	Khulna	9	13	14	0	3150	0	0
	Sub-Total		18	45	88	0	42650	107550	8110
6	Patuakhali	Barguna	4	33	33	0	33150	30317	6698
7	Patuakhali	Patuakhali	6	32	67	0	23300	37621	5204
8	Patuakhali	Pirojpur	4	25	40	0	16950	15594	0
	Sub-Total		14	90	140	0	73400	83532	11902
9	Faridpur	Gopalganj	6	59	74	0	5000	0	0
10	Faridpur	Madaripur	4	17	37	0	4500	0	0
11	Faridpur	Shariatpur	7	14	57	0	5300	0	0
	Sub-Total		17	90	168	0	14800	0	0
	Total		72	345	591	0	151425	201589	20012
*Immediate Response									33274
G. Total							184699	201589	20012

Source: BRAC; 11 December 2007