Chapter 14

Managing fiduciary risk and protecting programme success

The objective of this chapter is to provide information regarding the implementation of social transfer systems, with a focus on the systems required for registration, determination of eligibility and payments. In addition, the chapter also discusses issues relating to human resources, pilot programmes, accountability and security.

Introduction

The design and delivery of social transfer programmes should work to ensure programme success, particularly by addressing the risks that threaten effective benefit delivery and the achievement of the intervention's primary objectives. Particularly in fragile states, wherever there is fraud or corruption or inefficiency, there are possibilities for improper allocation of funds, as well as for the abuse of beneficiaries' rights. While effective and well-implemented delivery systems help address these risks, as does appropriate monitoring and evaluation, there is also a need for explicit strategies to address these risks.

Managing fiduciary risk

"Fiduciary risk" can be defined as the risk that social transfer resources:

- are not used for their intended purposes;
- do not achieve value for money; or
- are not properly accounted for.[1]

More broadly, fiduciary risk can be defined as the likelihood that social transfer programmes fail to achieve their primary objectives, which is the greatest value-for-money risk. Figure 14.1 below illustrates some of the

Box 14.1: Assessing fiduciary risk: the Productive Safety Nets Programme, in Ethiopia

The Productive Safety Nets Programme (PSNP) in Ethiopia, to which DFID has committed £70 million over a three-year period, began early in 2005. This programme succeeded a Food Security Programme, replacing emergency food aid with a wider strategy for achieving food security. It combines social transfers with work programmes and is aimed at over 8 million people. Between 2006 and 2008, the real incomes of PSNP beneficiaries increased by more than 50%.

Before committing to the earmarked poverty reduction budget support (PRBS) funding for the programme, DFID Ethiopia undertook a fiduciary risk assessment (FRA), which was submitted in January 2005. Although funds were to be channelled through a special bank account outside the central exchequer, government institutions at federal, regional and district level were to be responsible for implementing the programme. In particular, the mainstream government accounting and reporting systems were to be used. The FRA for the programme drew heavily on DFID Ethiopia's fiduciary risk assessment for PRBS funding, submitted just two months before, but also drew evidence from assessments of the financial reporting systems in the forerunning Food Security Programme, about which there were concerns. The risks posed by the Productive Safety Nets Programme were assessed

sources of fiduciary risk in social transfer programmes.

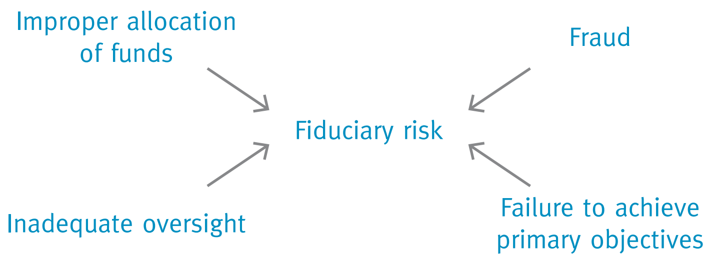

Figure 14.1 Sources of fiduciary risk in social transfer programmes

Fiduciary risk reviews

The U.K. Governments Department for International Development (DFID, now also known as UKAID) has developed a system for assessing programme risks called "Fiduciary Risk Assessments" (FRAs) which are required for all programmes that exceed a specified threshold and are funded by DFID/UKAID. The typical fiduciary risk assessment will include at least three components:

- a thorough evaluation of the counterpart government's public financial management and accountability (PFMA) systems, and an assessment of the related risks;
- an assessment of whether there is a credible programme to improve; and
- documentation of the assessment to inform the decision-making process.[2]

as being higher (between medium and high) than those for general PRBS (between low and medium risk).

As well as inherent weaknesses in the overall public financial management and accountability (PFMA) systems, the programme contained additional risks due to capacity constraints at the district level, uncertainty about the way in which the special funding channels would operate, and a lack of clarity about the level at which some of the controls would operate. Although the Federal Government of Ethiopia was perceived as having a credible strategic plan for public sector capacity building, the programme depended on PFMA systems at the district level, which were stretched due to a significant move towards decentralisation.

A short-term action plan was drawn up to address the specific fiduciary risks to the delivery of the Productive Safety Nets Programme, while continuing to work towards strategic PFMA reform. The systems for the disbursement of funds and for maintaining transaction and financial management records were all specified in detail, together with the training to operate them. Budgeting, reporting and audit arrangements were also enhanced.

SOURCES: DFID (2006), DFID (2008).

Mechanisms of accountability

The success of the programme depends critically on the mechanisms that ensure that programme delivery is subject to appropriate oversight and redress. These mechanisms can offer transparency, reduce corruption and provide avenues for beneficiaries who are denied appropriate benefits.

People must understand the benefits to which they are entitled and appreciate their options for redress when benefits are unjustly denied. Beneficiaries of social transfers often lack the resources to protect their rights and provide necessary feedback to policymakers. The institutionalisation of a beneficiary advocate can address this power imbalance and promote the effectiveness of the programme.

A number of models exist for providing advocates for beneficiaries. A public ombudsperson can serve as a useful mechanism for protecting beneficiaries' entitlements. The official is normally appointed at a high political level – perhaps by the President. The ombudsperson exercises considerable political autonomy in order to serve as a beneficiary advocate without fear of political pressure. The ombudsperson's office must be well-resourced, with adequate staff to address complaints by claimants and beneficiaries. The office requires an adequate budget to inform the public of their rights and mechanisms for redress. One level of the appeals process can operate through the ombudsperson's office. Advocates' effectiveness is reinforced by transparency, so that advocates can enforce clear rules for ensuring equity. In other cases, a local representative can serve as a liaison between beneficiaries and programme staff. In Mexico's Progresa programme, local groups of beneficiaries elected representatives from among themselves, promotoras, who were responsible for communicating about operational issues and problems.[3]

However, beneficiary advocate programmes can be subject to pitfalls. In Mexico, evaluations suggested that some promotoras abused their power, leading programme officials to recommend the creation of community committees to replace them – with one representative focusing on education, another on health, etc. Both Mexico and Colombia have relied on beneficiary mothers to provide training and operational support, but have failed to provide additional compensation for the increased workload.[4] Effective use of community representatives can harness social capital – people are less likely to cheat the programme if they understand its role at a local level and perceive the risk of social sanctions for corruption – but such programmes must be carefully implemented and managed.

Communications and transparency

Transparency and effective communications must ensure that the beneficiaries and broader population understand and appreciate the objectives of the programme. Popular appreciation of the effectiveness of the programmes is essential to maintain the political support of voters and politicians.[5]

Increasing transparency can improve accountability. In Uganda, providing workers with clear information about the wages to which they were entitled reduced corruption. Previous projects lacked this transparency and suffered substantial leakage.[6] In South Africa, however, social workers will generally not describe the formula used to determine eligibility. The lack of transparency makes it difficult for potential beneficiaries to engineer their responses to the means test questionnaire. However, this lack of transparency also undermines the rights-based approach that underpins South Africa's system. If people do not understand the criteria, they cannot make informed decisions about whether or not to appeal an adverse eligibility decision.

Instruments of public financial management

Supervision of interviews

One of the most common methods to ensure the accuracy of registration information is for supervisors to monitor the interview process – either during field surveys, in office interviews, or by reviewing the questionnaires. For example, in Colombia supervisors are responsible for examining all questionnaires on a continuous basis, and referring flawed questionnaires back to the interviewee for reapplication. Common mistakes are regularly reported to the administrator to provide feedback into the training process for interviewers.[7]

Information verification systems

Less common are systems for continuous verification of eligibility information. Potential mechanisms include: random checks for re-interviewing and auditing; automated checks for inconsistencies, duplication or missing information; and comparisons with external databases. In South Africa, a recent comparison of social grant beneficiaries against the national public service employment records provided evidence of significant fraud, and the Minister of Social Development took the lead in rooting it out.[8] In fact, South Africa found that it was losing an estimated 1.5 billion Rand (215 million USD) a year through corruption and poor administration with the delivery of their social grants. The Department for Social Development (DSD) initiated a major anti-corruption campaign following this 2003 realisation.[9] The computerisation and automated cross-checking of Pakistan's Baitul Maal record identified tens of thousands of beneficiaries registered in multiple provinces, freeing resources for an additional 23,000 new beneficiaries.[10] A similar initiative was conducted recently in Brazil, and in Colombia automated checks provide lists of duplications and inconsistencies. Suspect questionnaires are verified through field visits to the beneficiary unless the error originated in the data entry process. Strong accountability mechanisms have positive political benefits. For example, if evidence of fraud is reported by the press (which is possible with any programme involving the distribution of cash), government can demonstrate due diligence in addressing corruption.[11]

Civil society oversight

Government is not the only agent responsible for public financial management. Civil society actors – supported by government or operating independently – can serve as beneficiary advocates and anti-corruption watchdogs. Civil society organisations in South Africa have successfully employed the "progressive realisation of access to social security" provision of the national constitution to pursue judicial oversight of the implementation of social transfers. Latin American conditional cash transfer programmes usually include an elected representative or committee to provide oversight. Many countries publicise toll-free anti-corruption "hotline" telephone numbers.[12] Other programmes rely on the more dubious measure of publicly releasing the lists of beneficiaries, sometimes on the internet. In Ethiopia's Productive Safety Net Programme, community representatives oversee the payment of wages.[13]

Penalties

While upper-income countries effectively pursue criminal penalties against those who perpetrate fraud in social transfer schemes, developing countries have not yet taken full advantage of the potential of civil and criminal penalties. However, some countries are taking steps to combat fraud. Although South Africa's anti-corruption campaign has not generated criminal sanctions, it has managed to recover substantial resources lost to fraud through fines and reimbursements.[14] For example, South Africa did succeed in minimizing the percentage of total social security budget lost to corruption between 1997 and 2006, from 6.99% to 2.46% respectively.[15] Brazil is also taking steps towards combating fraud, and is currently establishing a joint oversight mechanism between the Attorney General and the Ministry of Social Development.[16]

Case management and appeals

During the implementation process, it is crucial to establish a system for addressing exceptional circumstances and eligibility decision appeals. This is particularly important for conditional cash transfers, although even

BOX 14.2: Improving the management of fiduciary risk in Brazil's Bolsa Familia

Bolsa Familia, which has evolved through several precursor safety net programmes, is itself an adaptation. Under the results-based framework, an iterative process to constantly adapt and improve the project is a fundamental element of design, not a symptom of failure.

Any social transfer programme – particularly a programme as large as this one – runs risks of fraud and leakage. The targeting, monitoring and evaluation components of the project are, in effect, countermeasures for anticipating, identifying and minimizing fraud. In that regard, some examples of adaptations taken by the government include the following:

- Issuing a well-publicised decree (a regulamento) that clearly spells out the operational guidelines of the programme.
- Entering into formal agreements that clarify the responsibilities of the Ministry of Education and the Ministry of Health for monitoring and for providing information about conditionalities to the Ministry of Social Development.
- Launching a formal network system (rede de fiscalização) for overseeing, auditing, and controlling fraud, in collaboration with the Attorney General (Ministerio Público) and other public auditing agencies (procuradorias, TCU).
- Initiating steps to improve the Cadastro Único: developing cross-checks to reduce duplications (which resulted in the cancellation of some 200,000 duplicate benefits); establishing a working group to revise eligibility criteria and improve questionnaires; providing training to municipalities to strengthen implementation; developing a quality index for monitoring and evaluating the Cadastro; etc.
- Strengthening citizen social controls: publishing beneficiary names by municipality on the internet, setting up a hotline for citizens to report irregularities and suspected fraud, and reinstating local committees to provide citizen oversight for the programme.
- Initiating work on design for an impact evaluation of the programme.

A 2003 review of Brazil's Cadastro Único, completed at the request of the government, identified the following additional recommendations for managing fiduciary risk:

"An improved targeting system should also include clear guidelines for regular independent audits, cross-checks and quality control. First, regular random audits should review application procedures and database management for a random sample of families (up to 20% resurvey). This is critical to ensuring objective and transparent treatment of all citizens by reducing opportunities for manipulation and favouritism in the selection of beneficiaries. Clear procedures should be established (and published) for punishing fraud. Second, the improved system should also build in regular cross-checks to avoid some of the errors that have plagued the existing Cadastro, such as duplication of beneficiaries, "ghost beneficiaries" (missing or dead beneficiaries), or "lost candidates" whose data get lost during file transfers.

unconditional programmes require this function. In some cases, routine updates to the single registry reflecting household changes (births, deaths, livelihoods changes) will take place through the case management function. This function also addresses persistent non-compliance with conditionalities, and may provide social worker interventions that try to address the problems facing beneficiaries who are not meeting conditions before cutting off their benefits.[17]

Monitoring conditionalities

Conditional programmes require systems that will track compliance with the conditionalities, such as school attendance or health clinic visits. This

"Finally, independent quality control is also needed to measure how well the beneficiary selection mechanism (improved Cadastro Único) is actually working in terms of avoiding errors of exclusion of the poor and inclusion of the non-poor. This can be done by including questions about receipt of programmes that use the Cadastro Único – especially the new Bolsa Família programme – in regular, nationally representative surveys. This information would provide regular feedback about the actual targeting outcomes of these programmes – and the accuracy of the targeting instrument. Such surveys and random sampling could also be done at a sub-national level, to provide feedback to specific states (and possibly municipalities) about the accuracy of the application of the targeting instrument within their jurisdictions."

A 2007 study further established some main points for managing fiduciary risk from 2007 onwards:

"While the basic architecture of the BFP has now been largely solidified, a few remaining challenges remain to strengthen institutional roles, including, inter alia:

- *Strengthening the role of the states in the provision of technical assistance, training and coordination of decentralized municipal implementation;*
- *Strengthening capacities at municipal level to improve local management of the BFP, particularly for those municipalities with low scores on the decentralized management index (IGD); and*
- *Clarifying roles and responsibilities of MDS, the Caixa and municipalities in handling BFP queries and complaints from the public (and between MDS and the Caixa in handling queries from municipalities).*

"As discussed above, the BFP has registered very impressive targeting accuracy in terms of minimizing leakages (errors of inclusion). Although a certain degree of leakages will always be inevitable (as with all programmes), MDS can take additional steps to further fine-tune targeting accuracy. These include: adopting an improved questionnaire for registration; expanding crosschecks to further reduce errors in the registry; strengthening municipal capacity for implementing registration and recertification; adopting updated and improved poverty maps for improved geographic targeting and monitoring; and expanding the use of multi-dimensional indicators (proxy variables) for validation of self-reported incomes and monitoring of family circumstances. Strengthening targeting accuracy will make room for entry of new poor families. Further efforts are needed, however, to reduce errors of exclusion. If additional funds become available (either at the federal or sub-national levels), we recommend that BFP managers consider: (a) expanding coverage and municipal quotas beyond the 11.1 million families; and/or (b) building in additional graduation and human capital incentives (see below). With respect to expanding coverage, this is necessary to reach the remaining gaps in coverage of the poor (errors of exclusion), as described above. However, it is important to recognize that this would also inherently involve a certain degree of additional leakages to the less poor (or near poor)."

SOURCES: de la Brière and Lindert (2005); Lindert (2005); Lindert et al. (2007).

monitoring system must be integrated with the payments and appeals processes.

No comprehensive cost-benefit analyses of conditionalities have been conducted for existing programmes and been made publicly available. Imposing conditionalities is an expensive programme feature in terms of administrative, private and social costs. The large number of people who comply – even in the absence of incentives – raises the question of whether conditionalities should be imposed. It may be more cost-effective to identify and address those households who fail to invest in human capital, rather than monitoring the majority with complex systems when they comply anyway. Different programmes address non-compliance in varying ways. Oportunidades excludes families from subsidies and scholarships immediately when they fail

BOX 14.3: Do the wrongly excluded appeal? Evidence from Progresa's early days

An early evaluation of Mexico's Progresa programme (now Oportunidades) revealed that even when a formal appeals function exists to mitigate exclusion and inclusion error, people do not always use it.

Early PROGRESA policy envisioned that communities would participate in reviewing the beneficiary list. Induction assemblies would be an opportunity for people to make claims about households that were not selected to participate but should be included, and about households that were selected to participate but should not be included. PROGRESA would then investigate these claims, and make decisions to add or drop families from the beneficiary list. Further, induction assemblies would serve to educate non-beneficiaries about the principles of the program so they would understand why they were not included, with the aim of diffusing social tension.

However, extensive focus groups and interviews revealed no examples of assemblies being used for this purpose. This was primarily because non-beneficiaries were not invited to the assemblies, and thus did not know the assemblies were meant to facilitate an appeals process: "only those 'on the list' had been invited because people see the purpose of the assembly to be for explaining the program to beneficiaries and thus not relevant for those who were not selected". One *promotora* (elected local programme official) explained that she did not invite non-beneficiaries because "there was no point in putting them to the trouble, and stirring up their resentment". In a few cases, non-beneficiaries asked municipal authorities to explain the purpose of the meeting, but the authorities did not provide this information. Even when communities did submit petitions to include new names on the beneficiary list, the new families were not added, and *promotoras* generally believed that it was not possible to change the list.

In sum, the mere existence of a formal appeals function does not ensure that it will be actively utilised. Implementation, monitoring and evaluation must take care to ensure that communities' right to review and challenge the beneficiary selection is not only enshrined in policy, but plays out in practice.

SOURCE: Adato et al. (2000), pages 37-40.

to comply. However, immediate benefit suspension appears to contradict both the human capital and poverty reduction arguments.[18]

Building and retaining human resources

For a social transfer scheme to function smoothly and meet its objectives, it is vital to build and retain human resources. However, social security staff often suffer low morale, due to poor conditions of service and inadequate training.[19] For example, in Sri Lanka, programme administrators tend to be overworked: there is approximately one administrator for every 85 recipients, and in addition to administering monthly transfers, administrators are also responsible for supervising local capital works projects and developing savings societies.[20]

An ILO report found several common institutional problems in developing nations that administer cash assistance and cash insurance programmes. These include political interference in staffing and investment policy; fragmentation of policymaking and administrative responsibilities; excessive administration costs; poor terms of service for staff; neglect of compliance, enforcement, and policy research functions; difficulties in maintaining records; excessively complex procedures; delays in processing benefit claims; and a failure to ensure that contributors and beneficiaries understand the principles and requirements of the various schemes.[21]

Enhancing institutional capacity is important. This requires more than financial resources, since the constraint in scaling up is usually human and institutional, not financial. Thus, it is necessary to direct funding towards investment in capacity. External financing that is accompanied by policy advice, technical assistance, training and capacity building is particularly valued. Investments in developing human capacity – training officers, health workers and teachers – help to scale up the anti-poverty initiative.[22] It may be necessary to provide training on a larger scale than initially required – some of the newly trained workers may find better-paying jobs in the private sector, reducing capacity in the public sector. It is important to keep government salaries sufficiently competitive to retain skilled personnel.

Pilot programmes and scaling up

Cash transfer pilots provide an implementation option that is useful when a country lacks sufficient human or financial resources, or when design questions make it difficult to implement a national scheme with confidence. A small cohort of dedicated individuals can successfully manage a pilot programme, and this option is particularly appropriate when external funders or non-governmental organisations want to demonstrate the potential impact of a social transfer programme. Countries such as Guatemala, India, Indonesia, Nigeria, Sierra Leone and Tanzania have all utilized pilot conditional cash transfers (CCTs).[23]

Pilot programmes serve useful functions as a design tool and political economy device. Pilots enable proponents to demonstrate success, which can motivate policymakers to adopt the programme. (They can also demonstrate failure, but when pilots are well-resourced, there tends to be a bias towards success. A pilot is not an objective experiment "testing" a particular design – the aim is to make it work.)

The true test of a pilot programme lies in how it scales up to a national level. Expansion of a pilot tests and stresses the fundamental design of the programme. Nicaragua's experience with the Red de Protección Social programme shows how impacts assessed from the pilot can be biased. For example, several problems regarding targeting had to be resolved. The first population census ultimately did not find and register an extensive enough grouping of households. Therefore it was necessary to conduct a second and third round of the census in order to ensure a complete set of households. The original plan was to involve and target approximately 5,000 households. The problems experienced with the census rounds caused these numbers to shift to 6,000 and 4,000 respectively, following each new census.[24] Pilots involve an initial learning period which provides an opportunity to work through unexpected challenges. The working through design problems and the development of improved systems and capacity building materials constitutes an investment in the future of the project. Pilots usually cannot take advantage of the same economies of scale as a full national project – the costs of systems, for example, are much greater on a per participant basis for a pilot than for a national programme. In addition, pilots may be more vulnerable to the Hawthorne effect, where observed behavioural changes results from the programme's novelty or from the evaluation itself, and they do not necessarily reflect permanent behavioural changes resulting from the programme's treatment. In Nicaragua's case, performance on some outcome indicators was slightly weaker in the second year of the programme compared to the first.[25]

Feedback or macro effects become important during the upscaling process. For example, a wage subsidy programme, such as the one implemented in Argentina's Proempleo experiment, may have little effect on the market wage rate while the programme remains a pilot. However, when the programme is scaled up to the national level, the subsidy programme will predictably affect market wages at the macro level. The success or failure of pilots is highly dependent on context. Once the programme is scaled-up, the context will differ appreciably, and prices and wages will respond through feedback effects.[26]

Due to the fact that pilots are highly dependent on local context for success or failure, the exact same programme may work well in one village but fail in another, as demonstrated by mixed experiences with Bangladesh's Food for Education Program.[27] The programme reached the poor in some places, but not in other nearby villages.

Donor harmonisation supports the process of scaling up. This is demonstrated in Uganda, where donors – in partnership with civil society and the private sector – allied around a framework and vision for growth and poverty reduction, and became effective and unified partners in supporting the reforms. In Bangladesh, Grameen, BRAC, and other institutions established donor consortia and programme financing (rather than project financing), helping to reduce transaction costs and putting everyone on the same page.[28]

Security cash movements

In areas facing high crime and physical insecurity, social transfer programmes require additional security to protect the transportation and delivery of cash. Private contractors that handle cash payments in South Africa and Namibia hire armed security guards to secure the delivery of funds. The use of direct bank deposits – like Zambia's Kalomo pilot – can bypass the problem.[29]

Security poses a substantial problem to Afghanistan's work programmes. In the north-western province, regular military clashes forced periodic suspensions of the Labour Intensive Works Programme (LIWP). Cash-for-work programmes have been found to be more secure and less corrupt than food-for-work programmes: in-kind transfers require the physical transportation of a greater volume of commodities, with increased attendant risk. Local commanders are also more likely to pressure project managers to divert in-kind benefits away from the selected beneficiaries. Agencies in Afghanistan are adapting innovative strategies to deliver cash safely to beneficiaries, particularly relying on the local remittance system (hawala).[30]

In heavily militarised regions of Ethiopia, where unofficial militia, demobilized soldiers and criminals undermine the rule of law, transporting cash poses considerable risk. Some non-governmental organisations, such as Save the Children UK, abide by policies that do not allow armed guards in their official vehicles, further complicating delivery. Their Meket Livelihoods Project has succeeded in enlisting the support of government vehicles for cash transport – which enables armed guards to accompany the funds.[31]

Oxfam's cash-for-work programme in Kitgum, Uganda encountered serious security problems, prompting Oxfam to develop security measures, including:[32]

- Limiting information about cash movements,
- Restricting bank transactions,
- Decentralised and randomised cash disbursements, and
- Transparency and community participation in security precautions.

Summarising lessons for successful implementation

It is necessary to invest in building staff capacity, and in broad social institutions involved in making anti-poverty programmes work. These institutions may be governmental, private or nongovernmental. Institutional problems such as corruption or information backlog are a hindrance to the successful implementation of social transfer programmes.

The appropriate mix of centralised management and decentralised implementation requires finely balanced trade-offs. Local role-players often have critical knowledge about the needs of programme beneficiaries. Balanced decentralisation fosters greater programme flexibility – although sometimes with greater fiduciary risk.

Good communication reinforces all dimensions of successful implementation. Particularly as local managers learn what is and is not working, information must be shared – not only through the formal information management systems but through open communication channels that reach the highest levels of programme management. Top officials must be open to criticism and even scandal – a transparent process that tackles the problem rather than obscures it will lead to long-term success.

Good communication supports the dissemination of lessons on what is working, and what is not. It is useful to publicise early successes through the media, in order to keep beneficiaries and implementers informed about results, as well as to encourage the public and politicians to remain supportive of the programme and to encourage take-up. For example, it may be useful to produce documentaries (as has been done in Zambia with the Kolomo project) about the programme and its impacts, and broadcast these on national networks.[33]

Endnotes

1 DFID (2006c), page 4.

2 Ibid., page 5.

3 Britto (2005), page 9, citing Adato (2000).

4 Ayala Consulting (2003), page 32.

5 DFID (2006c), page 12.

6 Khogali and Takhar (2001), cited in Harvey et al. (2005), page 4.

7 Castañeda et al. (2005), page 31.

8 Reddy and Sokomani (2008), page 54.

9 Ibid., pages 1-2.

10 Dawn (2003).

11 Castañeda et al. (2005), page 31.

12 Ibid., page 32.

13 Sandford (2005), page 13.

14 National Anti-Corruption Forum (2009).

15 Reddy and Sokomani (2008), page 19.

16 Castañeda et al. (2005), page 32.

17 Ayala (2005), page 59.

18 Ayala Consulting (2003), page 29.

19 ILO (2000), page 222.

20 Tabor (2002), page 43.

21 ILO (2000), page 223.

22 World Bank (2004c), pages 10–11.

23 Bassett (2008), page 21.

24 Moore (2009), page 8.

25 Maluccio and Flores (2004), pages 18–19.

26 Ravallion (2005), page 3832.

27 Galasso and Ravallion (2005), page 6.

28 World Bank (2004d), pages 10-11.

29 Devereux et al. (2005), page 54.

30 Harvey (2005), page 3.

31 Devereux et al. (2005), page 39.

32 Khogali and Takhar (2001), cited in Harvey (2005), page 96.

33 Schubert and Goldberg (2004), page 9.