

A DROP IN THE OCEAN: UGANDA'S COVID-19 CASH TRANSFER







1. INTRODUCTION

With surging cases of COVID-19, the government, on 18th June 2020, once again, tightened the containment measures including the announcement of the second national lockdown and closure on non-essential businesses. It should be recalled that the first lockdown had a chilling effect on the economy and the livelihoods of many Ugandans. By June 2020, 17% (2.55 million) of working Ugandans had lost employment and likely to descend into poverty due to the pandemic. This was in addition to 8.3 million Ugandans who lived in abject poverty before the pandemic.

Given that the initial measures plunged the economy into a recession, with economic growth dropping from 6.5% in FY 2018/19 to 2.9% in 2019/20, the second national lockdown is likely to have far-reaching effects of epic proportions that the country has not seen in the recent past.

The first COVID-19-triggered social protection measures such as <u>food distribution</u> which were not only marred with quality, corruption and accountability issues but also had a limited geographical scope. In addition, the government neither provided an economic stimulus package to businesses nor provided conditional cash transfers (urban cash for work under labour-intensive public works program) as it had planned. The government reluctance to provide social protection forced many Ugandans to resort to negative coping mechanisms such as <u>child labour</u>, sexual exploitation, sale of household assets, and contracting debts, where possible, to fulfil their household needs.

The COVID-19 Relief Fund to Vulnerable Persons in Urban Areas

On 29th June 2020, following cabinet approval the new Minister of Gender, Labour and Social Development (GLSD) issued a plan outlining the implementation guidelines for the COVID-19 Relief Fund (also known as the direct cash transfer program).

According to the plan, the government will reach out to 501,107 households in the Kampala metropolitan areas, all cities, and municipalities. Each household is set to receive a net of UGX. 100,000 (\$28.5).

ISER commends the shift to cash transfers from the government's prior focus on food distribution which was mired with scandal regarding who received and the poor quality of food resulting in a lawsuit brought by civil society. As ISER and partners' prior research has shown, by December 2020, 166 countries had done cash transfers as a form of relief as part of the response to COVID 19.

¹ Misc. Civil Appeal of 155 of 2020 in CEHFRONT v. A.G Civil Appeal -9 of 2020.



Given that many people's incomes are affected by the lock down, direct cash transfer is the quickest means to put money in the pockets of Ugandans so that they can continue to fulfil their basic needs until the pandemic abates. Cash transfers also have a ripple effect, stimulating the economy and reducing the prevalence of child labour.

We are, however, cognizant of the fact that beyond cash transfers, people need more support, such as suspension of water disconnections due to failure to pay, continued access to electricity, adequate shelter and continued access to affordable medical care, both in the short and medium-term given the protracted nature of the pandemic.

The government has indicated a hardline target of 501,107 vulnerable people and UGX. 100,000 cash payment, which have been received with mixed reactions from the public and set in motion a debate hinged on the rationale for the coverage of the program, the adequacy of the amount, process of identifying beneficiaries and the appropriateness of the payment platforms.

ISER underscores the importance of a human rights approach when crafting economic relief programs and is issuing this brief with a view that it will inform policymakers and key stakeholders in the design and implementation of a direct cash transfer program.

2. KEY CONSIDERATIONS FOR CASH TRANSFERS

2.1. What type should Government do?

The central question to this cash transfer debate is whether the cash transfer should be universal – paid to everyone regardless of their income status – or targeted to those in most need such as the poor, the vulnerable and the informal sector workers. We present the pros and cons of both scenarios hereunder.

2.1.1 Universal cash transfers

Policy experts argue that a universal cash transfer is arguably a smart policy response to address the socio-economic impact of a crisis such as the COVID-19 pandemic, for various reasons. One, the universal approach is preventive to the extent that it gives the recipients the flexibility to temporarily exit work when they feel they are at risk. Two, it can be delivered swiftly and easily (because the government does not have to verify income or any form of vulnerability) without leaving no one behind. Three, it avoids stigmatization or demonization of recipients. Four, especially in the middle of a pandemic, government may not know, with precision, the number of people that are vulnerable or need cash. Five, the government can always get the money spent back by taxing those beneficiaries who end up doing well throughout or after the crisis. Thus, if the universal cash transfer approach is financed through progressive or a mixture of progressive and proportional taxation, it can still bridge the inequality gap.







Therefore, in a country like Uganda where there are several institutional and structural barriers and practices that have disproportionately disadvantaged a section of its citizens, universal cash transfers can offset these kinds of exclusion and guarantee financial protection to all and equal access to basic needs. With the lack of adequate data on vulnerable groups especially vulnerability due to the pandemic, they are the simpler option to implement.

Nonetheless, it requires a commitment of a substantial amount of resources. One way to mitigate this is to exclude salaried workers where the government already has data from Pay As You Earn (P.A.Y.E) tax. Those that may fall within salaried workers but suddenly lose their job can then be dealt with on case by case.

2.1.2 Targeted cash transfers

Targeted cash transfer may be "conveniently affordable" to a resource-constrained country, like Uganda.

However, targeted cash transfers have several limitations. First, this approach can potentially leave out people who may experience sudden income loss as a result of the crisis. Two, developing countries, like Uganda, have no data on the incomes of the majority of her people, particularly those in the informal sector and therefore the use of proxy measures is prone to <u>inclusion errors</u> (giving the transfer to those who are not poor but have a strong incentive to lie) and <u>exclusion errors</u> (failure to deliver the transfer to poor individuals who slip through due to the inadequacies of the eligibility criteria). Three, using year(s)-old data from national statistical institutions like the Uganda Bureau of Statistics (UBOS) to determine those who need cash assistance amidst the pandemic does not reflect current reality on the ground. ISER and partners' prior <u>research</u> has also found targeted cash transfers can have higher administrative costs and when families have to register to benefit, some may miss out due to limited information about the program.

On balance, ISER would recommend the universal cash transfer option excluding formal sector/salaried workers who government has data on through P.A.Y.E given the unprecedented impact on livelihoods by this second lockdown and the ease of implementation of a universal cash transfer. The country lacks data to facilitate the easy identification of beneficiaries under the implementation of targeted cash transfers. From an accountability perspective, it is easier to monitor the universal approach since government has data on P.A.Y.E.



3. GOVERNMENT'S APPROACH TO COVID 19 CASH TRANSFERS

According to information we have gleaned on the COVID-19 Relief Fund Implementation Plan, the government has taken the path of a targeted cash transfer approach. Accordingly, 12 clusters/categories from Kampala Metropolitan Area, cities and municipalities have been identified to benefit from the cash transfers as shown in table 1 below.

Table 1. List of the categories set to benefit²

#	Category					
1	Bus/taxi drivers, conductors					
2	Baggage carriers, wheelbarrow pushers, touts, traffic guides and loaders in the taxi,					
	bus parks and stages and other commercial centers such as kikuubo					
3	Barmen, DJs barmaids, waiters and bouncers					
4	Bar, gym and restaurant workers					
5	Food vendors in buses, taxi parks and arcades					
6	Artists (musicians, comedians, etc.)					
7	Boda-boda riders special hire drivers and uber drivers					
8	Salons, massage parlour workers					
9	Teachers and support staff in private schools and teachers in government schools					
	not on the government payroll					
10	Car washers					
11	Slum dwellers/ghetto residents					
12	Street and food vendor, shoe shiners and cobblers					

Source: Circular issued by the Permanent Secretary, MGLSD, dated 30th June 2021 on data compilation for cash transfers to vulnerable persons affected by the COVID-19 containment measures

While it is commendable that this time around government has looked beyond the Kampala Metropolitan Area to include other cities and municipalities, the targeting is inherently problematic and prone to exclusion errors. It ignores several categories of vulnerable people, such as; those who are chronically poor, the historically marginalized and minority communities, households that have a member who is chronically ill or living with a permanent disability, and pregnant women and lactating mothers, among others. Although already disadvantaged even before the lockdown, they face additional challenges since whatever community support they relied upon is diminished as everyone tries to save money. Their living costs may go up due to public transport being closed

² The initial list released by the minister for GLSD included orphans and vulnerable children (OVCs) as the 13th category of beneficiaries but were later removed according to the circular by the permanent secretary.

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which has ripple effect on other prices. Government should continue to ensure it figures out how to cater to these groups.

There are also other categories of people who are temporarily out of employment or business, temporarily or permanently laid off formal or casual employees etc., who are not listed.

In a crisis like COVID-19, vulnerability must be based on proxies. People belonging to targeted clusters may not necessarily reside in or work from cities and municipalities that the plan is confined to.

Also, selecting cluster members who reside in cities and municipalities while totally ignoring those living on the boundaries and let alone other chronically poor Ugandans living outside cities and municipalities is the highest form of exclusion, to say the least.

3.1. Beneficiary Selection and Registration

According to the cash transfer plan, the executive director of KCCA, all city and municipal town clerks will be responsible for "aggregating existing data and updating it." According to the circular from the Permanent Secretary, MGLSD, City and Municipality Clerks should compile the lists of beneficiaries using "existing administrative records" with support from Uganda Bureau of Statistics (UBOS) and National Identification and Registration Authority (NIRA).

This arrangement is based on the false premise that government has data on the already identified clusters, and therefore what is left is merely updating the data. This may not be true given that cities, urban councils and UBOS do not have data on informal workers. The Uganda Bureau of Statistics, the repository of the country's data, has denied having the data on who is vulnerable that the government claims it has. Most of the available data compiled by UBOS is based on proxies that are prone to fundamental errors. And as mentioned above, relying on year(s)-long "administrative" or UBOS data to distribute cash would mean people would miss out. UBOS recently noted its data on food distribution during the lockdown can't be relied upon to assess vulnerability given that people that were not vulnerable/unable to work because of lockdown also received food. The city and municipal clerks' assurance that they have data on identified vulnerable people is not accurate. There are new and existing members of these clusters that are not in the records of the cities and municipalities. Informal sector workers are also highly mobile, always seeking to work where there is a market, hence moving from one city or municipality to another.

The other suggestion put forward by government has been registration through work clusters. The categorization or clustering of vulnerable people based on their job categories is inherently problematic for three reasons: one, it is limited in both geographical and vulnerability scope. Two, it may breed ground for interest-based lobbying hence alienating inferior job categories, like baggage carriers, or job categories whose members are not well coordinated or have no advocacy platforms. Three, there is a strong incentive for people to lie about their work to benefit from cash transfers.

Clustering also may lead to double registration of households that have members that belong to more than one cluster. For instance, if a household has a bartender, a car washer and a restaurant attendant, it may benefit thrice at the expense of the other vulnerable groups.





If the government uses the targeted approach like it has indicated, it would need to allow those new and existing members to be registered as beneficiaries of the fund. Fresh registration of beneficiaries should be both categorical targeting – involving proactive outreaches to vulnerable households – as well as self-targeting for groups that may not make it to the registration centers, such as PWDs and those who are chronically ill. The downside of this approach is the time it takes to register and verify, which is necessary to avoid errors. Time we do not have.

If the government used the universal approach, which ISER recommends as discussed in section 2, it would merely eliminate those on the P.A.Y.E list and enable salaried workers who may be captured on P.A.Y.E list but are categorically affected like private teachers to register through their association and get the money that government previously allocated to them but never distributed.

3.2. Coverage

The government is set to reach out to 501,107 households in the Kampala metropolitan areas, all cities and municipalities. This is just a quarter of Ugandan households that are vulnerable. This narrow targeting is likely to overwhelm cities and municipalities as many Ugandans will show up during registration.

The latest UNHS survey shows that the bottom 20.3% of Ugandans (8.3 million in absolute terms) live below the poverty line. Additionally, 12% of Ugandans (4.1 million Ugandans) live with some form of disability while 0.3% of Ugandan households (20,500 households) are child-headed. On the other hand, 2.55 million Ugandans are predicted to be out of employment due to the lockdown. Hence, based on the 6-member household average, there are about 2.5 million vulnerable households. The March 2021 simulations by Doyle et al 2021, put the number of vulnerable urban households that needed cash at 1.97 million. Overall, even under the targeted cash transfer approach, government would have to target at least 2.5 million vulnerable households.

Under the best alternative- the universal cash transfer approach, the government would target all Ugandans above 18 years of age, irrespective of their income status. Based on the <u>UBOS 2021 population projections</u> for the year 2021, there are 20.5 million Ugandans who are 18 years and above. However, this number does not include refugees in Uganda who are <u>estimated</u> at 1.4 million. Nonetheless, there have been government-paralleled but <u>development partners-coordinated efforts</u> to address the plight of refugees. These efforts should continue as refugees are equally disproportionately affected by the pandemic, like any other vulnerable Ugandan citizen. The government would go a step further and exclude those whose P.A.Y.E was paid recently under the assumption that they are still employed.

3.3. Adequacy, frequency and duration

While cash transfers programs are designed as an emergency intervention to cushion the poor and vulnerable for a short period, the protracted nature of the pandemic means that poor households are likely to need more or longer-term social support. The government has indicated that it plans to give a one-time payment of **UGX.100,000** (\$28.6) to each vulnerable household. This amount is based on the formulae set out in table 2.



Table 2	Formul	lae for	targeted	Cash	Transfer
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Item	Unit	Quantity	Unit cost (Ushs)	Total cost (Ushs)
Milled maize	Kgs	20	2,000	40,000
Beans	Kgs	10	2,500	25,000
1 bar of soap	Bars	1	3,000	3,000
Cooking oil	Litres	3	4,000	12,000
Others				20,000
Total	100,000			

Source: MGLSD statement on the implementation of the proposal to transfer the COVID-19 relief fund to vulnerable persons in Uganda.

On the other hand, the Mayor of the Kampala City Council Authority (KCCA) <u>proposed</u> that each beneficiary household receives UGX. 6,000 daily an equivalent of UGX.252,000 (\$72) per month, for two months.

The proposed amount by the central government which is based on wrongly computed commodity prices is unrealistic and does not meet the minimum threshold. It is only 1/3 of the average household monthly expenditure and 1/4 of the average monthly expenditure for Urban households. In addition, the one-time payment proposal does not take into account the duration of the lockdown.

The 2016/17 UNHS estimated the average monthly household expenditure after adjusting for inflation to be UGX.325,800 (\$93) of which 46% (about UGX. 150,000) is expenditure on food and nonalcoholic beverages; 16.4% (UGX. 53,400) on housing, water, electricity, gas and other fuels; and 5% (UGX.15,000) on health.

We, therefore, recommend to the government pay what would be 203,400 rounded off to USH 204,000 per targeted household which is in line with UBOS average monthly household expenditure on food, non alcoholic beverages and gas and other fuels, water, electricity.

Moreover, there are reasons to consider increasing even this amount. Food prices rose, resulting in headline inflation increasing to 4.1% for the period ending March 2021. UBOS noted monthly headline inflation rose by 0.3% and it was attributed to food and non-alcoholic inflation. Food and non-alcoholic beverage increased by 0.2% for the year ended March 2021 compared to -2.3% by end of February 2021. If the lockdown persists for months, there would be reasons to increase.

The government has indicated that it earmarked only **UGX. 54.7 billion** for the COVID-19 Relief Fund. It may need to revise this.





3.4. Verification of Beneficiaries

The government has indicated that beneficiaries will be verified using the National Identity cards based on the NIRA database. While the use of national IDs appears to be an appropriate system and may eliminate double-counting of beneficiaries, it is likely to leave out Ugandans who have no national IDs yet brutally affected by the lockdown, in addition to orphans and vulnerable children who may not have IDs. <u>ISER and partners recent research</u> showed that Ugandans have failed to access social services, including health care and cash transfers, on the account of not having National IDs. Only 15 million out of 20.5 million Ugandans have National IDs. The proposal to refer those without National IDs to NIRA for registration may not be tenable due to restrictions on the movement of people and a total ban on public transport.

The government also plans to use Village Health Teams (VHTs) to verify beneficiaries, which is commendable because they know the community. However, it is not clear why the government does not want to involve village local council committees who, in any case, are better positioned to understand vulnerable people in their villages. Ignoring to put village councils at the center of verification will not only delay the process but will also make it susceptible to errors, particularly in urban areas.

3.5. Payment and Delivery Systems

The government proposal to transfer cash using mobile money can be quick and insulated from fraud if properly implemented. However, there is a significant number of Ugandans who do not own mobile phones. According to the 2018 National IT Survey by Uganda's National Information Technology Authority (NITA), only 71% of the Ugandan population owned a mobile phone, a figure that was lower for women.³ Furthermore, since the national ID number is required for registration of SIM cards, many are unable to register a SIM card in their own name. This has led to multiple SIM cards registered to a single NIN, making it difficult to determine which account should receive the transfer and creating the potential for fraud and leakages.

The use of cash delivery through Post Bank vans to supplement the use of mobile money to deliver transfers may help to ameliorate some of these problems. Post Bank is government bank and would be cheaper to government than commercial bank. However, there has not been clear guidance issued about how such vans will operate, when and how often they will be present in the community. The hope offered by delivery through Post Bank is however further downplayed by requiring beneficiaries to present a National ID or NIN slip to collect their cash transfers. This should be looked into to avoid exclusion.

Government had earlier commendably stated that those without mobile phones will be targeted through vouchers which can be used to redeem cash at any mobile money agent within their geographical location.

^{3 &}lt;a href="https://www.nita.go.ug/publication/national-it-survey-2018-final-report">https://www.nita.go.ug/publication/national-it-survey-2018-final-report





As a whole, we caution against any payment proposal that involves the distribution of physical cash in the field, which is highly susceptible to collusion and corruption. Any form of distribution that makes it difficult/impossible to monitor& verify who has received the cash would also be problematic.

3.6. Gender equality, equity, and socio-economic inclusion

Women are disproportionately represented among informal sector workers and often hit hardest by the pandemic and lockdown measures. These include salon owners, small bar owners, road side traders selling small items. They are often disproportionately represented among vulnerable groups. The government must ensure under any measure there is special attention paid to gender and equity. As noted above, if implemented as the government plans to, the targeted cash transfers program is prone to exclusion errors resulting from the inadequacy of the eligibility criteria which have left out special categories of poor and vulnerable people, such as; chronically poor who live in rural areas, PWDs, the chronically ill, the historically marginalized and minority communities and the female-headed households.

3.7. Monitoring and evaluation

According to the government's Implementation Plan, members of parliament, resident district commissioners and technical officers will supervise the registration, identification and payment of beneficiaries. Only Village Health Teams (VHTs) can support verification. Village Council committees, city and municipality mayors and councilors have been locked out of monitoring the implementation of the fund. It is important to allow city and municipal mayors and councilors also to play the monitoring and evaluation role since they may even be closer to vulnerable people than the public officials envisaged in the plan and if local council members are involved including in monitoring, the process is less susceptible to elite capture. Moreover, there is already suspicion that locking out local councilors was meant to keep out opposition representatives who were overwhelmingly voted in the targeted urban cities and municipalities, hence making the public suspicious of the entire program.

The MLGSD should also set up a robust M&E system with a clear results framework aligned to the country's social protection system and allows coordination of activities between and among government MDAs. The beneficiaries registered and reached should also be integrated within the single social protection registry under the MGLSD that was set up in 2020. Periodic internal assessment and post-distribution monitoring, including social audits, should be conducted.

3.8. Stakeholder engagement

The government has already stated its hardline position, a target of 501,107 beneficiaries and a one-time payment of UGX. 100,000, without meaningful stakeholder engagement.

In times of crisis like the COVID-19 pandemic, meaningful stakeholder engagement sets the ground for citizens buy-in, trust and empowerment to monitor the program themselves. Therefore,



government must reach out to all Ugandans of all shades, listen to different perspectives and take into considerations all the tradeoffs concerning the modalities of the cash transfer, openly and transparently. It is also prudent to work with the country's civil society organizations throughout the lifecycle of cash transfers. Failure to ensure meaningful participation of key stakeholders including ordinary Ugandans is likely to undermine the efficiency and effectiveness of the program as well as erode its transparency and accountability safeguards.

Meaningful participation of the affected populace can't take place without access to information. The plan for cash transfers and other measures to be undertaken by government should be widely disseminated to ensure people have access to information about the process. Similarly, during the process of and after disbursement, information about the number of people covered, disaggregated by district, should also be publicly available.

3.9. Timeliness

Ideal cash transfers should work within a specific time to protect intended beneficiaries from adopting extreme coping mechanisms. Therefore, time is of essence. Government should act boldly and swiftly in addressing the socio-economic effects of the pandemic. It should start but with a plan to rapidly scale up to cover all Ugandans not receiving a monthly income.

3.10. Access to remedy

The Plan does not make specific mention of how grievances will be handled. In a country like Uganda where there is no accurate data on peoples' incomes or proxies to their incomes, errors are as inevitable as grievances. It is important there is a system where people can report. This could entail municipal/division appeals and complaints committee for the program that has broad representation from religious groups, civil society and clusters identified. It could also include setting up a dedicated hotline (toll-free), manned 24/7 to handle grievances that are populated in the already existing complaint section of the Single Registry for Social Protection. All complaints reported should be resolved promptly.

4. OTHER FORMS OF SUPPORT MUST CONTINUE/BE PUT IN PLACE

4.1. Temporarily halt rent, electricity and water payments

While initiating cash transfers is a commendable endeavor, it does not alleviate other pressures like rent, electricity, water. The Government must put moratoria on evictions due to failure to pay rent, electricity and water payments for the duration of the lockdown. These orders would not relieve the individuals of the responsibility to pay rent/bills when the lockdown lifts but in the context of a public health emergency, these moratoria are an important public health measure.





4.2. Continuity of existing forms of social protection

Uganda has been implementing some forms of social protection like grants given to senior citizens known as senior citizens grants, youth livelihood funds, disability grants which should continue throughout and after the pandemic.

4.3. Implement Cash for Work

The government was supposed to implement cash for work supported by the World Bank but it has not started yet as detailed in ISER's prior report, "Where Did The Covid 19 Money Go? <u>International Institutions Funding to Uganda.</u>" This program could start with employing workers in some of the categories that are considered essential.

4.4. Distribute the prior allocated money for teachers who were out of work when schools closed

Despite allocating money in a revolving fund worth Shs. 20 billion to distribute to teachers out of work during the prior lockdown last year when schools were closed, a year later, the individuals affected have <u>never received</u> that money. It is imperative this money is disbursed to teachers affected by the lockdown.

CONCLUSION

We commend the government of Uganda for considering cash transfers as a way to alleviate the impact of the lockdown on peoples' livelihoods. While the government intends to cover meagre households, it should progressively increase to cover every vulnerable person. The impact of this lockdown is far reaching and even informal sector workers that earned sizeable amounts have found themselves helpless, shut out of their business enterprises given that the lockdown was imposed with less than one hour's notice. This universal approach would be also easier to monitor compared to the targeted approach. Given lack of quality statistics, Uganda can not implement an equitable targeted approach, hence a universal approach is more inclusive.

While the government plans to dole out 100,000 UGX, this amount is not in line with the prices of food in Uganda and remains insufficient. The amount should be increased in line with the government's own data at the Uganda Bureau of Statistics which shows Ugandans spend on average 150,000USH per month on food alone and when cooking fuels, water are added, the amount is 204,000. In line with the increase in food prices that contributed to headline inflation in March 2021, and the lack of certainty about how long this lockdown will have to last, there may be reasons to even increase this amount.



Cash transfers, while commendable, should also be one of many measures the government is doing to ameliorate the impact of the lockdown and to provide a form of social protection. Moratoria on evictions, electricity and water payments during this time are essential. Ensuring continuity of existing forms of social protection is paramount. Thinking through how to implement the Cash For Work program funded by the World Bank that should have been implemented last year is also crucial as an additional form of support to those out of work through out and beyond the lockdown. The government should ensure teachers receive the money that was prior allocated to them but never actually disbursed to them.

Regardless of the approach taken, government must ensure the intervention is timely undertaken and there is community engagement and participation at inception and in monitoring of the interventions taken. Special care must be taken to avoid exclusion of recipients based on lacking National Id. Gender and equity considerations must also be taken into account. There must be clear and consistent communication with communities on the cash transfer, eligibility and timelines to ensure none that are deserving are left out.

This should also be a wakeup call to the government to maintain and update data on who is vulnerable and have robust social protection systems. The government set up a Single Registry for Social Protection as a common repository of beneficiary data from social protection programs and the vulnerable but it is yet fully populated. Failure to have data on who is vulnerable undermines the country's ability to provide social protection even beyond the pandemic or current crisis. The ILO found that countries who responded most effectively to the pandemic were those with robust social protection systems in place.4

ISER, Human Rights Watch, Friends of the Nation (2021) "I Must Work to Eat: Covid 19, Poverty and Child Labour in Ghana, Nepal, Uganda" at p.20, available https://www.iser-uganda.org/publications/ reports/486-i-must-work-to-eat-covid-19,-poverty,-and-child-labor-in-ghana,-nepal,-and-uganda





RECOMMENDATIONS TO THE GOVERNMENT

- 1. Significantly increasingly the funds available for the Covid relief cash transfer program progressively moving towards a universal approach. The target 501107 people government plans to cover should only be considered as the initial beneficiaries with a view to eventually covering everyone except existing salaried workers, essential businesses that are operational during the lock down and established businesses.
- 2. Increase the earmarked COVID-19 relief fund to at minimum 204,000UGX which reflects country's own data on average food consumption and energy and water from 2016/17 UNHS which should be progressively increased given the inflation that UBOS attributed to food prices this year.
- 3. Eligibility criteria for the emergency relief payments must be clearly communicated to communities. A communications strategy should be put in place to facilitate this.
- 4. Implement cash transfer program from a human rights based approach.
 - 4.1. Desist from cluster-based registration. All potential beneficiaries should be registered from either the village where they reside or work, based on proxy indicators of income or whether they are temporally out of work.
 - 4.2. Those who have been unable to register with NIRA and those who do not have a national ID number or national ID card should be eligible to receive the transfer, and accommodations should be made to ensure that they are able to access the transfer.
 - 4.3. Forms of identification accepted by data validators when identifying beneficiaries and at distribution points when distributing cash, should be expanded beyond the national ID number or national ID card to include alternative forms of ID; this could include, *inter alia*, birth certificates, driver's licenses, passports, voters' ID cards, etc.
 - 4.4. Those who do not have a mobile money account should be eligible to receive the transfer, and should receive clear communication as to the time, place, and manner of distribution. Any requirements, including IDs, should be clear, transparent, and non-discriminatory.
 - 4.5. Urgently underscore and engage village council committees, city and municipality mayors and councilors in identification if you do use targeted cash transfers and ongoing monitoring.
 - 4.6. Form municipal/division appeals and complaints committee for the program that has broad representation from religious groups, civil society and clusters identified.
 - 4.7. Set up a dedicated hotline (toll-free), manned 24/7 through which Ugandans can report their grievances. All complaints reported should be resolved within 5 working days.
- 5. Ensure continuity of existing forms of social protection.
- 6. Implement Cash for Work for categories considered essential.
- 7. Put in place moratoria on evictions due to nonpayment of rent and disconnections for electricity and water payments.
- 8. Gather views of the ordinary Ugandans who have been hit by the pandemic. These views should inform the approach that government should take. Cabinet approval without stakeholder input alienates citizens and may undermine the efficiency and effectiveness of the program.
- 9. Strengthen data collection on the vulnerable and populate the single registry to ensure availability of data to aid government in designing social protection programs.

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