HOW CAN ANTICIPATORY ACTION REACH SCALE AND SUSTAINABILITY?

LEARNING FROM CERF IN BANGLADESH

CENTRE FOR DISASTER PROTECTION

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REPORT

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About the Centre for Disaster Protection

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EXECUTIVE SUMMARY

Since 2020, the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) has been facilitating the development of frameworks for anticipatory action (AA), and Central Emergency Response Fund (CERF)-funded pilots across several countries. These pilots aim to generate further evidence of AA's benefits in decreasing the impact of foreseeable disasters, in terms of reducing human suffering, loss of life, and the cost of humanitarian response. The Centre for Disaster Protection is supporting OCHA's learning from these pilots by capturing lessons and benefits. This report takes a forward-looking perspective on the progress made in Bangladesh, focusing primarily on the question of how AA can reach scale and sustainability in future.

The first OCHA-facilitated AA framework for Bangladesh for riverine flooding was endorsed in 2020. It was triggered just a few days later, resulting in USD5.2 million released to World Food Programme (WFP), Food and Agriculture Organization (FAO) and United Nations Population Fund (UNFPA) to pay for AA, mainly for cash transfers. In 2021 and 2022, the CERF allocation increased to USD7.5 million and United Nations Children's Fund (UNICEF) joined, with Bangladesh Red Crescent Society (BDRCS) continuing as a partner. However, the trigger thresholds have not been met since 2020, so no further funding has been released from CERF since the first activation.

AA was already quite advanced in Bangladesh prior to the CERF-funded pilot. However, the pilot has added value by considerably increasing the scale of AA operations – previous pilots had very limited budgets and coverage. The 2020 activation reached 44,000 households, proving that AA for a rapid-onset hazard like flooding was possible, and further socialising the concept of acting early based on forecasts. It also enabled the generation of evidence (e.g. a quantitative impact study[1]) and learning on what shared approaches needed to be developed to improve future activations.

However, this study aims to go beyond reflecting on the OCHA-facilitated AA framework specifically, to reflect more broadly on what would now be needed, not only from CERF but also from the wider humanitarian, development and climate communities and government, to reach longer-term goals of scale and sustainability for AA. The report does not therefore comment extensively on the CERF-funded pilot's impact or effectiveness as a proof of concept.

Moving to scale and sustainability

Most actors strongly believe that the best route to AA scale and sustainability in Bangladesh is to move to government leadership of the approach. Bangladesh has a well-functioning government that has formally embraced the concept of AA and is quite advanced in discussions of how to integrate it into disaster response. Most actors agreed that further capacity building is still required to achieve this vision, and there is a recognition that it will take some time.

Linking AA with social protection would be challenging, but would be a good route to government leadership, scale and sustainability. Bangladesh has a relatively established social protection system which could be linked to pre-agreed triggers to enable it to distribute post-disaster support. Considerable work is underway by different actors on the feasibility of using social protection in an anticipatory way, and several pilots are planned.

AA in Bangladesh is very fragmented, with lots of different actors. Better coordination is needed on several levels to support scale and sustainability. Firstly, amongst UN agencies, to ensure that support provided under the CERF-funded AA pilot is coherent and coordinated; secondly, between agencies involved in the pilot and other actors who are also implementing AA; and thirdly, with government. Improving the quantity and quality of local NGOs' and civil society's participation in CERF's AA pilot would increase ownership and help contribute to building scale and sustainability.

The CERF-funded AA pilot currently operates as a standalone initiative, separate from other planning processes or programmes, including those led by the

1 Pople, A., Hill, R. V., Dercon, S., and Brunckhorst, B. (2021) *Anticipatory Cash Transfers in Climate Disaster Response*, Working paper 6, Centre for Disaster Protection.

government, the humanitarian community, or by development and climate actors. This means it is not integrated with wider resilience programming or with other crisis response processes and activities. A coordinating framework for AA and preparedness that could tie these different elements together is missing in Bangladesh. Involving development and climate finance more deliberately and strategically could help, also leading towards greater government leadership of AA.

Developing the trigger

Using a trigger ensures that action is the default, unlike traditional humanitarian response where someone has to activate the systems, which can cause delays. The trigger incorporated a discretionary stop mechanism – when thresholds are met, the Resident Coordinator (RC) has the option of manually overriding and deciding to pause. Generally, there is a strong consensus that this is a positive and necessary design element, with potential to build ownership and confidence in AA. Government, for example, are likely to prefer more control over activation than a purely science-based trigger allows. However, guidance should be developed to manage the risks of incorporating discretion in the AA trigger process.

Developing a sustainable, scalable AA trigger mechanism may therefore require a greater focus on flexibility, and less emphasis on a technically rigorous approach. An existing trigger that was already in use was adopted for the CERF-funded pilot in 2020, indicating a good level of technical capacity and a reasonable expectation of sustained use in future.

Government data is incorporated in the trigger mechanism, and forecasts are generally accepted as sufficiently reliable for floods. However, actors are keen for several future developments or adaptations of the trigger to make it more flexible, although they often showed little appreciation of the consequences, trade-offs or likely implementation challenges:

- Actors would like longer timescales for activation, and are willing to accept lower forecast reliability as a result, although this may not be acceptable to donors like CERF.
- Many actors would like the trigger to be multi-hazard, and were optimistic that, due to existing technical capacity, Bangladesh could be the first country to successfully develop a multi-hazard approach to AA. Cyclone is the most obvious next hazard to incorporate, as it is a major hazard in Bangladesh and a key priority for the government.
- There is also demand for flexible geographical coverage of AA so that activities can be triggered for localised events, or pivoted to cover other areas.
- Some also talked about incorporating multiple thresholds within the trigger mechanism so that different actors could be mobilised at different severity levels.

Flexible funding

Actors would like the CERF-funded pilots to be more flexible and enable agencies to pivot to cover unexpected scenarios. In 2022, there was a large flash flood in the north east of Bangladesh. This area (and hazard) was not covered by the CERF-funded pilot, so, understandably, there was no activation and release of AA funding. However, it was a high-profile disaster with serious impacts, and CERF provided other funding through its rapid response allocations. This situation has galvanised a view amongst many stakeholders that future AA should be more flexible to different emergency scenarios that arise at short notice, granting agencies more decision-making power and the ability to switch areas and even to change activities at short notice, depending on needs on the ground.

Actors were also keen for greater flexibility over the types of activities that are eligible for CERF funding. Currently, only AA pre-positioning (called 'readiness') and activation costs are covered, while complementary 'preparedness'[2] and longer-term system-strengthening costs are not. Other AA funding is available in Bangladesh, some of which can cover these additional costs, and there is some evidence that the CERF-funded pilot has catalysed more money overall for AA, but this takes time. Many organisations complained that they struggled to access funding for 'build' or preparedness activities, and had to rely on internal core funding for these necessary activities. These preparedness costs are not necessarily a

2 The term 'preparedness' is used here to refer to specific activities to lay the necessary groundwork for AA, rather than general preparedness for disasters (as the term may be used by a wider range of actors) that is closely linked to DRR and resilience-building, and may include longer-term activities such as developing early warning systems, evacuation procedures and facilities.

large proportion of overall AA costs, but are still significant and have to be covered for effective AA. There is therefore strong demand for a more coordinated approach that combines funding for both preparedness and anticipatory activities. Funding preparedness is beyond CERF's mandate, yet this type of resource is clearly necessary, suggesting that coordination with other funding mechanisms and actors should be a priority in order to reach sustainability and scale.

In addition, CERF funds have to be passed to UN agencies and then on to implementing partners. The timelines for transferring funds creates difficulties for smaller organisations who do not have their own internal resources or spare capital to cover gaps in funding. CERF's funding approach seems better suited to larger organisations who can stockpile goods or are willing to invest from a no regrets perspective. Allowing local NGOs more access to CERF funding, even a small percentage indirectly, could promote ownership and sustainability, increase innovation, integrate into wider resilience programming, build capacity and bring AA closer to the community level.

There is potential for government funding of AA in the near future, in addition to amounts already spent prior to disasters. However, developing stronger links with climate and development sectors could unlock greater scale and sustainability for AA funding. International finance institutions (IFIs) are strikingly absent from discussions on AA in Bangladesh, despite them being a major source of post-disaster finance. Development finance for anticipatory social protection would act as a major incentive for government adoption of AA on a large scale, potentially coming from a global disaster risk financing (DRF) mechanism like the Global Shield Financing Facility, given that Bangladesh is one of the initial 'Pathfinder' countries.

Short-term priorities for anticipatory action in Bangladesh

Urgently resolving problems with data sharing between the UN agencies involved in the CERF-funded pilot is a key short-term priority. The 2020 CERF-funded activation highlighted a need for a shared beneficiary database between UN agencies, to allow better targeting and analysis. Work is underway but there is currently no formal data-sharing agreement in place, which creates a risk to timely delivery of AA support. Improvements are also needed to coordinate data collection and verification processes between the different agencies.

The Resident Coordinator's Office (RCO) should continue to play a coordinating role, but ideally the pilot needs stronger links with climate and development actors, who have influential relationships with government. Possible entry points include linking the CERF-funded pilot with programmes aiming to support social protection systems strengthening (particularly the development of social registries), developing early warning infrastructure (given that Bangladesh is a first mover country for the Early Warnings for All initiative), or investigating options in relation to Global Shield Pathfinder activities.

Recommendations for OCHA's future engagement in anticipatory action

Future support packages distributed under the OCHA-facilitated AA framework should be based on evidence and analysis of what is needed ahead of a shock and likely to have a meaningful mitigative impact, bearing in mind the wider response that will follow. A significant proportion of the Bangladesh CERF allocation for AA focuses on cash transfers, and so there needs to be clear evidence that this is still the most appropriate modality. The transfer amount was set at the national level by the cash working group in consultation with the government, however, the impact study noted that 2020 transfer values were too small. These have been reviewed, with new amounts expected shortly. In Bangladesh, UNICEF was brought into the second phase to support with water, sanitation and hygiene (WASH), but it is not clear why this sector was prioritised over others. Similarly, some planned AA activities are more suited to response activities, for example, water treatment activities or the distribution of dignity kits. There therefore needs to be fresh consideration of the overall AA package on offer, and an evidence-based rationale for what is included and excluded.

For countries like Bangladesh, where there is an engaged government and considerable technical capacity and experience, OCHA needs to adjust the design of the CERF-funded pilots to shift from a UN-led approach towards nurturing government leadership. OCHA should develop a clear longer-term strategy so this aim can become achievable faster, including ensuring the right skills and relationships are in place to facilitate this. Reaching the goal of government leadership may require some compromises, for example, around willingness to

switch activities to suit government priorities, giving government a role in decision-making around the trigger methodology and activation, linking with government systems, expanding coverage and so on.

OCHA should also give strategic consideration to how the pilot design can evolve to embed AA within wider resilience work, which will require bringing in other climate and development actors and donors. Linking to preparedness funding could be a key route to facilitate this, but there needs to be greater clarity about where this money could come from, and the specific programmatic links.

The experience in Bangladesh highlights the need for an actor, or group of actors, with clear responsibility for the wraparound activities related to the pilots, such as ensuring the overall support package is appropriate; linking with preparedness funding and activities; liaising with government; coordinating adequate collection of beneficiary data; developing global data-sharing agreements; and ensuring follow-up from monitoring and evaluation (M&E) studies. A clearer split of roles and responsibilities between OCHA and country-level actors should be articulated to ensure all are covered, including where funding can come from.

Finally, OCHA should investigate how the CERF-funded pilots in countries like Bangladesh could incorporate greater flexibility, both of the trigger methodology and the funding approach. This would also likely mean a shift away from strict adherence to pre-agreed plans and scientific-trigger-based approaches. There is demand for greater discretion to be embedded within triggers to allow different sorts of information to be incorporated, and less reliance on hard thresholds. This would require support to build decision-makers' abilities to understand and interpret forecasts and models, as well as integrate other relevant information. Robust guardrails would be needed to guide which information should be considered and ensure funding is used as effectively as possible. This more flexible approach to AA is very different to current approaches being used in the region, by agencies involved in the CERF pilots and beyond, but offers great potential where scale and sustainability are the primary aims.

INTRODUCTION

This report captures learning from the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) anticipatory action (AA) pilot in Bangladesh. This is one of a series of pilots that aim to generate further evidence of AA's benefits in reducing the impact of foreseeable disasters in terms of reducing human suffering, loss of life, and the cost of humanitarian response. OCHA's Humanitarian Financing Strategy and Analysis Unit (HFSA) and Central Emergency Response Fund (CERF) secretariat are leading implementation of the AA pilots in collaboration with key partners. In Bangladesh, international agencies include the World Food Programme (WFP), United Nations Children's Fund (UNICEF), United Nations Population Fund (UNFPA) and Food and Agricultural Organization (FAO), with Bangladesh Red Crescent Society (BDRCS) involved as a key partner.

Collective AA is still an innovative space. Therefore, the Centre for Disaster Protection (the Centre) is supporting OCHA's learning from these pilots by capturing lessons and benefits that emerge from the process, as well as advising on strategies to monitor and evaluate the short-, medium- and long-term results. A process learning exercise was conducted on an activation of the pilot in Bangladesh in 2020[3] and a subsequent impact evaluation was conducted in 2021, in collaboration with Oxford University.[4]

This report differs from other learning outputs produced by the Centre as it takes a forward-looking perspective, and focuses primarily on the question of how AA can reach scale and sustainability in Bangladesh.

3 Gettliffe, E. (2020) *Process Learning from UN-OCHA 2020 Monsoon Anticipatory Action Pilot in Bangladesh*, Centre for Disaster Protection.
4 Pople, A., Hill, R. V., Dercon, S., and Brunckhorst, B. (2021) *Anticipatory Cash Transfers in Climate Disaster Response*, Working paper 6, Centre for Disaster Protection.

BACKGROUND

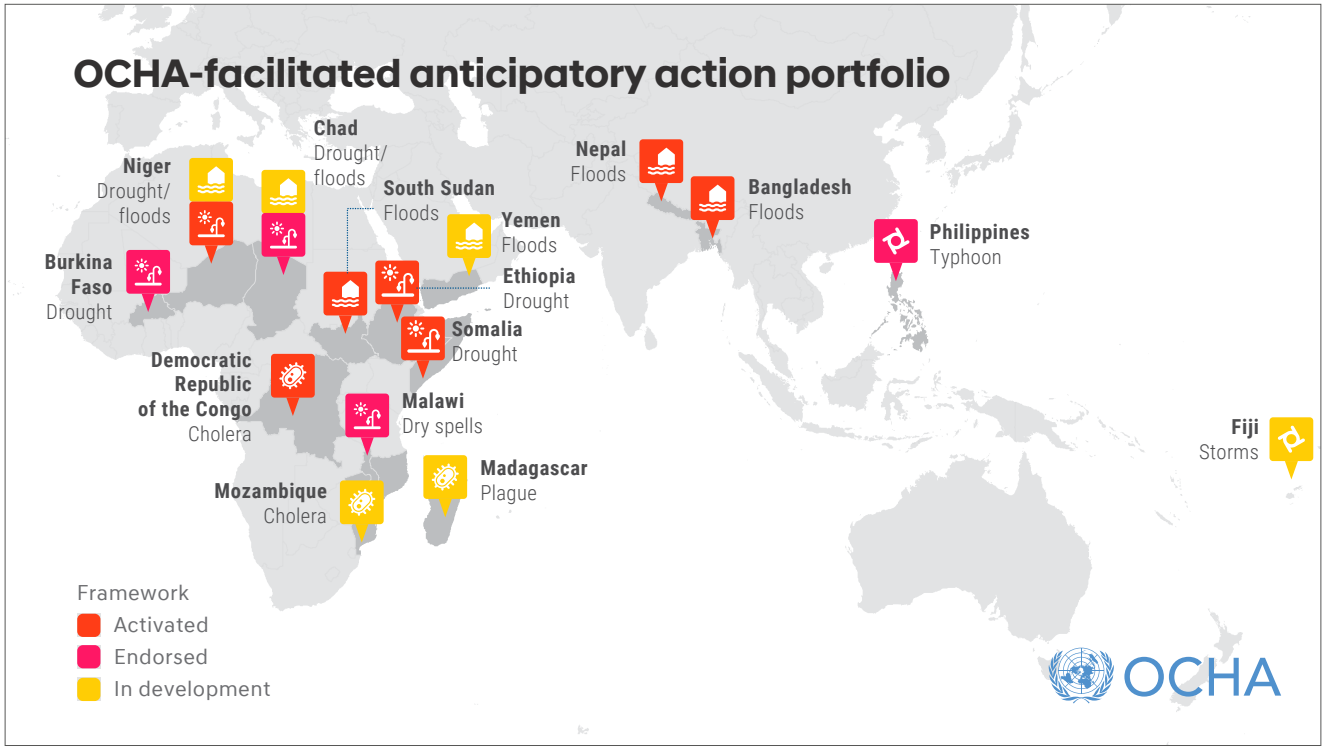
Anticipatory action is designed to reduce the impact of disasters on household welfare. It incorporates a trigger mechanism, which releases money ahead of a shock when set thresholds are met, to activate planned activities that mitigate the shock's impacts.

Building on growing evidence that acting before the onset of predictable shocks is significantly faster, more dignified, and more (cost-) effective than traditional humanitarian response, OCHA has been facilitating the set-up of multiple AA frameworks in different countries. In 2020, OCHA and partners began facilitating the development of pilots in Bangladesh, Ethiopia, Malawi and Somalia, and preliminary work in Chad. In 2021, these efforts were scaled up to include six more pilots – in Burkina Faso, Madagascar, Niger, the Philippines, South Sudan and Nepal – plus a multi-country cholera pilot.

The first OCHA-facilitated AA framework for Bangladesh was endorsed on 25 June 2020. Just a few days later, on 4 July the readiness trigger was reached. A confirmation letter was sent within four hours, confirming that USD5.2 million would be released to the agencies involved. The activation trigger was reached on 11 July, and all cash transfers, hygiene and dignity kits had been distributed by 15 July. Approximately 23,000 households received cash from WFP; UNFPA distributed almost 6,000 dignity kits; and FAO reached approximately 18,500 households with animal feed and storage drums.

In 2021, a new OCHA-facilitated AA framework was developed for a larger amount of money from CERF: up to USD7.5 million. The largest share, by a considerable amount, was still allocated to WFP, with an increased allocation from USD4.25 million to USD5.5 million for cash transfers. UNICEF was brought on board to implement water, sanitation and hygiene (WASH)-related activities, including the provision of safe drinking water. Partners agreed to build on the experiences of the 2020 activation to develop a common beneficiary

Figure 1: Map of OCHA-facilitated anticipatory action portfolio (2023)



Source: Adapted from OCHA website

database (more on this in the section below on short-term priorities), and jointly develop content and distribute early warning messages. However, there were no activations of the CERF funding during 2021.

The same agencies were included in the 2022 OCHA-facilitated AA framework: WFP, FAO, UNICEF and UNFPA, with BDRCS as an expected implementing agency. Table 1 below shows the planned activities for each partner in the 2022 CERF application. As in previous years, the vast majority of resources were allocated to WFP for cash transfers. The thresholds were not met in 2022, as in 2021, meaning no AA activation took place during the year.

Table 1: Bangladesh 2022 CERF anticipatory action application

Requesting Agency	Sector/Cluster	Total Project Requirement (USD)	Amount Requested from CERF (USD)	People Directly Targeted (with CERF funding)	Geographic Area (first-level and if relevant, second-level administrative division)	Key Activities (with CERF funding in brief bullet points)
FAO	Agriculture	780,000	780,000	86,000	Bogra, Sirajganj, Gaibandha, Kurigram, Jamalpur	Animal feed and storage drums
UNFPA	Gender based violence and sexual reproductive health	732,366	569,363	10,000	Bogra, Sirajganj, Gaibandha, Kurigram, Jamalpur	Dignity kits, menstrual hygiene management kits, reproductive health kits, conditional cash transfers
UNICEF	WASH	550,429	550,429	130,000	Bogra, Sirajganj, Gaibandha, Kurigram, Jamalpur	Access to safe drinking water, jerry cans, water treatment plants
WFP	Multipurpose cash	5,500,000	5,500,000	399,490	Bogra, Sirajganj, Gaibandha, Kurigram, Jamalpur	Multipurpose cash

Source: Bangladesh CERF Summary Application 2022

METHODOLOGY

This study differs from other process learning reports on CERF-funded pilots completed by the Centre, in that it is more of a forward-looking analysis, focused on the question: **How can AA reach scale and sustainability in Bangladesh?** The following areas were specifically investigated:

- What is the overall vision for AA reaching scale and sustainability in Bangladesh, and how does this differ across actors?
- How could AA be embedded in existing planning and related processes in the country?
- How could and should the trigger design evolve in future to reach scale and sustainability?
- How could and should funding for AA evolve in future to reach scale and sustainability?

This report on Bangladesh is complemented by a similar study on Nepal[5] that was conducted concurrently, using the same overarching questions and data collection tools.

Data collection for this study included a desk review of relevant literature, including CERF documentation and other reports sent by key informants. Semi-structured interviews were conducted with 17 key informants (KIs), with individuals initially selected by the CERF team, and subsequently added to by the Centre research team. Interviews were conducted remotely.

The study had a number of limitations. Firstly, all interviews had to be carried out remotely, which can create a barrier to understanding and rapport-building. Due to time and resourcing constraints, no interviews were conducted with local government to verify information provided by partner agencies. In addition, despite the research team's best efforts, it was difficult to secure interviews with relevant government officials and local organisations.

Table 2: Key informant interviews

KI Stakeholder Group	Organisations	No. of KIs interviewed
CERF/OCHA team		4
UN agencies	Resident Coordinator's Office, WFP, UNICEF, UNFPA, FAO	9
AA implementing agencies	Bangladesh Red Cross, START Network	2
Government	Cyclone Preparedness Programme	1
Other	Red Cross Red Crescent Climate Centre	1
TOTAL		**17**

5 Scott, Z. (2023) *How Can Anticipatory Action Reach Scale and Sustainability? Learning from CERF in Nepal*, Centre for Disaster Protection.

STAKEHOLDER VISIONS FOR THE FUTURE OF ANTICIPATORY ACTION IN BANGLADESH

Actors expressed a common vision for government-led AA in Bangladesh, and argued this was the best route to scale and sustainability. Interviewees, across all stakeholder types, consistently described a future for AA in Bangladesh that depends on passing government full ownership and leadership of the approach. AA is regarded as an important and appropriate approach in a disaster-vulnerable context like Bangladesh, and almost all those interviewed described this as a crucial step to reach scale and sustainability. Bangladesh has a well-functioning government who have formally embraced the concept of AA and are fairly advanced in discussions of how to integrate it into disaster response. Some government capacity building is still required to move to this future vision, and there is recognition that it will take some time. Considerable work is underway on testing the feasibility and exploring ideas of how to link AA with social protection, to promote both government ownership and effectively reaching scale and sustainability.

Actors have a vision for better coordination, both amongst UN agencies, and between the UN agencies, NGOs who are also implementing AA, and government. More coordination is needed for the OCHA-facilitated AA framework, if triggered, to be able to provide a coherent, unified UN response. Practical areas such as joint beneficiary targeting and data sharing need to be resolved for a seamless UN response under future CERF allocations. There also needs to be improved coordination between the UN, central government, and other actors implementing (non-CERF-funded) AA in the country (see section on short-term priorities below).

Agencies were also keen to suggest that future support should be more multi-sector and genuinely anticipatory in design, in order to mitigate impacts rather than just respond to needs. Interviewees talked about wanting to 'match needs in a more complete way'. The second phase of the OCHA-facilitated pilot in Bangladesh added in more sectors, as UNICEF were brought in to focus on WASH, to complement WFP's cash; UNFPA's gender-based violence (GBV) and sexual and reproductive health (SRH) support; and FAO's agricultural focus. Some interviewees argued for adding other sectors in future, for example child protection, health and shelter, in order to offer a coherent package of support that is genuinely anticipatory. However, no evidence or analysis was provided to justify the necessity of additional sectoral responses for AA.

Many actors want to see greater flexibility in AA approaches, particularly the ability to pivot to cover unexpected scenarios or localised events. In June 2022, there was a major flood in the north east of Bangladesh. This was not an area covered by the AA pilot, and the cause was flash flooding, rather than riverine flooding. Hence, the pilot's thresholds were clearly not met, nor had anticipatory actions been designed for that hazard/area.[6] However, agencies wanted to be able to activate and felt it discredited the CERF-funded pilot to not be able to respond, despite having capacity, when there was obvious need. They would not have been able to provide anticipatory action (as the floods were not forecasted), but several felt they could have provided very early support. CERF did provide funding from its rapid response allocation, but the experience has galvanised a view in Bangladesh that future AA should be more flexible to different emergency scenarios that arise at short notice.

AA in future should be nationwide and multi-hazard. Actors are keen to extend AA to cover cyclone risk and landslides, across the country**.** Bangladesh is also vulnerable to lots of other potential hazards, including coldwave, heatwave and disease outbreaks, but there is awareness that forecasts for these hazards are not as developed. Many interviewees, across stakeholder groups, were keen for Bangladesh to develop the world's first multi-hazard AA framework, arguing that there was sufficient capacity, enthusiasm and experience to do so. There was some recognition that to extend coverage to a much greater geographical area and more hazards, the technical approach would likely have to change.

Improving the quantity and quality of local NGOs' and civil society's participation in CERF's AA pilot would increase ownership and help contribute to building scale and sustainability. A few actors highlighted that

6 For further context, see Sheikh, K. (2022) *Flash floods in Bangladesh – and the way forward for the Anticipatory Action community*, Anticipation Hub Blog.

local actors and NGOs have had a very limited role in the activities, particularly as there was not an activation in either 2021 or 2022, the point at which local organisations would have been brought in. Some NGOs were involved in the 2020 implementation, along with the BDRCS and Save the Children (STC). Organisations like START Network are not a formal partner but have sought to influence discussions. There is considerable room for greater incorporation of local perspectives, particularly in the design of activities, which has been strongly led by UN agencies with seemingly little engagement with or learning from other actors working on AA in the country.

Some people expressed concern that national and local organisations are effectively second-class partners, rather than co-designers of the activities. Their voices could be strengthened, with more opportunities to share experiences to generate a more bottom-up approach. It was noted that a key strength of AA is that it buys more time for community consultation than is possible with normal emergency response. More community consultation has taken place under the pilot's second phase, but this is from a low bar, given that in 2020 there was not sufficient time as the activation was so soon after the AA pilot began.

WHAT VALUE HAS CERF ADDED?

AA was already quite advanced in Bangladesh prior to the CERF-funded pilot. Several organisations including WFP, BDRCS, German Red Cross, STC and CARE already had AA initiatives underway in Bangladesh before CERF committed funding for an anticipatory action pilot in 2020. The government was also involved in discussions on forecast-based financing (FbF). CERF therefore arrived into a context where there was already significant momentum for and appreciation of AA, across a range of organisations.

The CERF-funded pilot has added value to AA operations in Bangladesh in several ways. Benefits articulated by interviewees include:

- **Scaling up AA.** Although there had been previous AA work in Bangladesh, it was all very small-scale, with limited budgets and coverage. For example, BDRCS and German Red Cross were targeting around 3,000 households, and WFP were reaching less than 5,000. In contrast, the CERF-funded pilot was a different order of magnitude, reaching 44,000 households in the July 2020 activation.
- **Proving AA is possible and demonstrating impact.** The activation in 2020 was generally regarded as a successful example of collective anticipatory action, with USD5.2 million activated several days before the flood and approximately 220,000 people supported. An independent impact study found that "households [that had received AA support] were 36% less likely to go a day without eating during the flood. Three months after the flood… [they] reported significantly higher child and adult food consumption and wellbeing. They also experienced lower asset loss, engaged in less costly borrowing after the flood, and reported higher earning potential" (Pople et al, 2021).[7]
- **Generating learning.** The 2020 activation provided an opportunity for UN agencies and their implementing partners to try AA at scale, and experience the implementation and technical challenges, in order to improve. For example, the need for shared early warning messages and a common beneficiary database were highlighted through the first activation, leading to follow-up work by agencies to initiate both. Organisations like UNFPA who had not previously worked on AA described it as a 'rich learning opportunity' for them internally, for example, on how to move money through their systems quickly enough. They also appreciated being able to work with more experienced agencies and learn from them. The lack of activation since has limited opportunities for further learning, although CERF may like to formally reflect on and publish how the findings of various monitoring and evaluation (M&E) investments have led to concrete changes.
- **Initiating shared approaches.** For example, the trigger mechanism was already under development prior to the CERF-funded pilot, but the OCHA-facilitated AA framework meant it was more widely used. The 2020 activation highlighted the need for better collaboration on targeting, and led to attempts to develop a shared beneficiary database. A database of 130,000 households has now been developed, led by WFP, although there have been several challenges in coordination, registration and data sharing (see section below on short-term priorities for more information).
- **Socialising the idea of AA.** Some interviewees mentioned less tangible benefits from the CERF-funded pilot; for example, facilitating shifts in the predominant mindset amongst actors away from unplanned disaster response, and encouraging bigger conversations around AA's potential, with a range of actors including government and donors.

7 See Pople, A., Hill, R. V., Dercon, S., and Brunckhorst, B. (2022) Anticipatory Cash Transfers in Climate Disaster Response, Centre for Disaster Protection and University of Oxford.

HOW COULD ANTICIPATORY ACTION BE EMBEDDED INTO EXISTING PROCESSES AND APPROACHES?

The CERF-funded AA pilot currently operates as a standalone initiative, separate from other planning processes or programmes, whether government, humanitarian, development or climate-related. To reach scale and sustainability, and particularly to reach interviewees' vision of government leadership as mentioned above, this obviously has to change. Embedding AA within preparedness initiatives, contingency planning and wider DRR approaches is a crucial next step. However, as one interviewee stated, 'Bangladesh has not got nexus thinking yet.' Whilst there are examples of AA as an approach being connected with general disaster response, there is no evidence of wider links with development partners, climate change strategies or resilience programming.

AA is already formally integrated into government's approach to disaster management, included in the Standing Orders on Disasters and with its own Forecast Based Financing/Action Task Force. The Standing Orders on Disasters sits under the Disaster Management Policy. It was last revised in 2019, prior to the CERF-funded pilot, and it sets out roles and responsibilities for both internal and external actors in relation to disasters. It includes the concept of AA, although it uses the terminology of forecast-based financing, and it specifies a Task Force which is currently in operation. Interviewees confirmed that the covid-19 pandemic and staff turnover had limited the Task Force's operations in recent years, but that humanitarian actors were engaging with it for advocacy and capacity-building purposes. Several saw the Task Force as in need of re-establishment and momentum, but offering great potential for future government engagement.

Linking AA with social protection would be challenging but would provide a good route to government leadership, scale and sustainability. Bangladesh has a relatively well-established social protection system which could be linked to pre-agreed triggers to enable it to distribute post-disaster support. Interviewees noted that several agencies were moving in this direction, with discussions underway at Heads of UN Agency levels, European Commission Humanitarian Aid (ECHO), UK Foreign, Commonwealth and Development Office (FCDO), and Start Network. However, social protection is a large political mechanism in Bangladesh. Government is very invested, across different ministries, and there is likely to be resistance to the idea of linking with automatic triggers. Actors prefer the power to make their own decisions and provide blanket support. Red Cross/Red Crescent actors have conducted a feasibility study[8] which identifies a selection of programmes with potential for scale up for shock anticipation or response, but a clear technical proposal to government is needed, that is mindful of political economy factors and capacity barriers. Working jointly with actors like the World Bank would be useful, to unlock contingent funding and technical assistance (TA).

Bangladesh does not have a coordinating framework for AA and preparedness. Several interviewees highlighted that there are lots of different organisations working on fragmented AA in Bangladesh (one key informant said they knew of 38 different AA actors), but no joint national framework to guide activities. A number of interviewees stated the next priority for Bangladesh is to develop a multi-hazard framework to cover preparedness and AA, by AA actors in collaboration with the government, to complement the government's existing strategies and preparedness processes. The OCHA-facilitated AA framework could align with, and sit within, this broader framework. It would require joint work between the government Task Force and the AA Working Group in Bangladesh, which involves organisations like BDRCS, WFP, Resident Coordinator's Office (RCO), CARE, STC, Start Network and others.

The RCO is very supportive of the CERF-funded AA pilot and wider AA work in Bangladesh, leading calls for a more systemic approach and facilitating discussions on how this could be achieved within humanitarian planning and programme cycles. The Humanitarian Coordination Task Team (HCTT) has a Nexus Strategy for

8 Sengupta, S. and Sivanu, S (2022) *A feasibility study on the potential use of cash-based social protection systems for floods in Bangladesh*, Red Cross Red Crescent Climate Centre, German Red Cross and Bangladesh Red Crescent Society

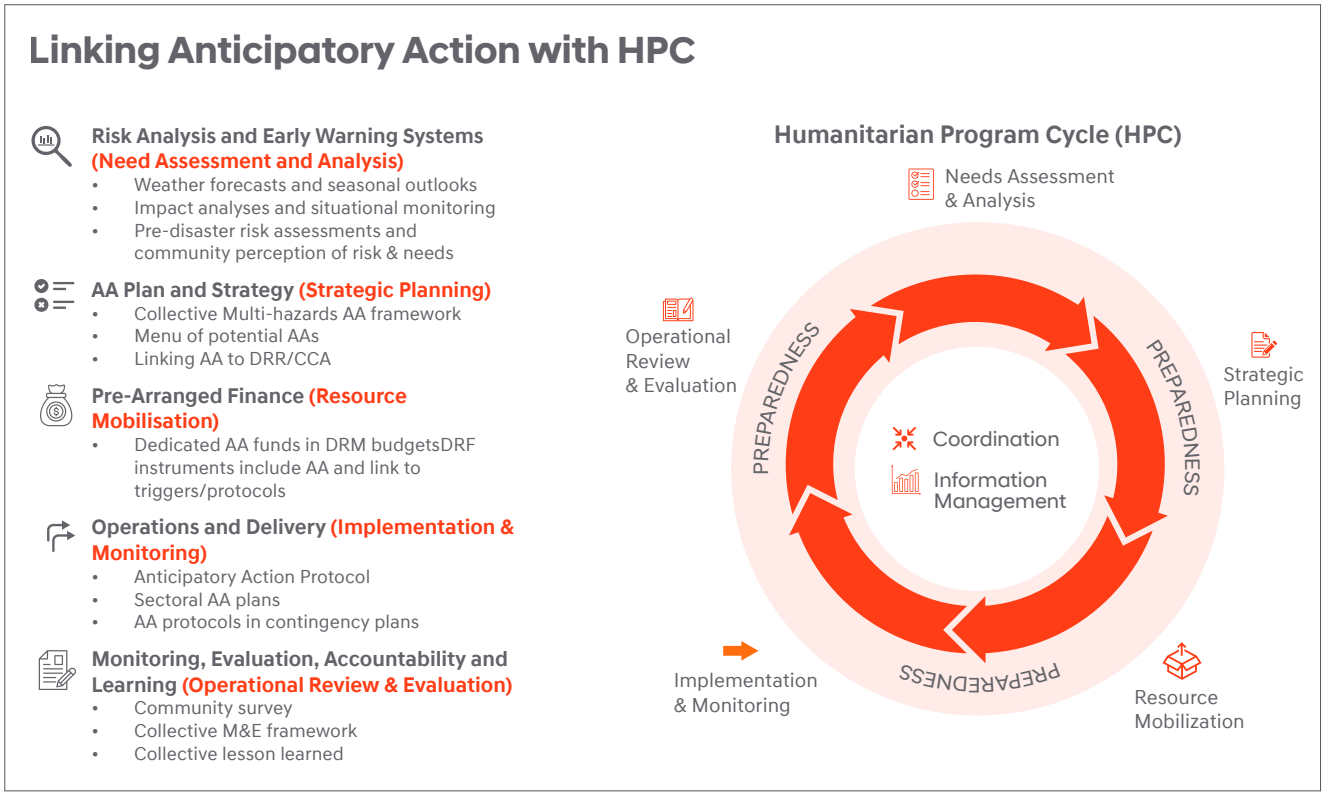
Climate-related Disasters 2021–25 in Bangladesh that covers preparedness and response, to align with the National Plan for Disaster Management 2021–25. AA is mentioned many times in the strategy. In November 2022, the UN Country Team (UNCT) released a Position Paper on AA that was endorsed by 11 clusters and eight working groups, comprising over 50 national and local organisations. It calls for the CERF-funded pilot to become a permanent fixture in Bangladesh, and for 'better integrating AA in the national DRR and preparedness strategy, scaling up collective AA, scaling financing for AA and developing more complementarity with community and government efforts' (see box 1 for the full list of recommendations). In addition, the RCO has further developed these ideas in a recent presentation to the HCTT Advisory Group (see figure 2 below), demonstrating how AA could be embedded across the different stages of the humanitarian program cycle (HPC). These examples show that AA is a topic of interest within the RCO and UN agencies, with efforts already underway to broaden the approach and lead to greater scale and sustainability.

Box 1: Recommendations on Anticipatory Action from the UN Country Team

1. Support the development of national funding opportunities through discussions with key donors and stakeholders for a rapid and proactive response.
2. Explore opportunities for national pool funding for preparedness and Anticipatory Actions from climate change and other funding.
3. Exploring the expansion of collective anticipatory action to more regions and more climate-related hazards.
4. Advocacy for social protection systems integrates the core components of an anticipatory action system.
5. Support the development of a national strategic preparedness framework, complementing the government's strategy, with a focus on anticipatory action to improve preparedness for proactive and rapid response.
6. Support early warning for all executive action plans 2023-27 in the national context for the UN Global Early Warning Initiative for the Implementation of Climate Adaptation.
7. Negotiate yearly earmarked funding from CERF to promote collective anticipatory action in Bangladesh.

Source: Resident Coordinator's Office, Bangladesh

Figure 2: Embedding Anticipatory Action in the Humanitarian Programming Cycle



Source: Adapted from presentation by Bangladesh Resident Coordinator's Office, 2023

GOVERNMENT LEADERSHIP OF ANTICIPATORY ACTION

The Bangladesh government is openly supportive of AA and has institutionalised the approach to a limited extent, suggesting sustainability has already been achieved to some degree. As mentioned above, the government has its own AA Task Force and has institutionalised forecast-based action (FbA) within the Standing Order on Disasters. Both of these pre-date the CERF-funded pilot but still require more operationalisation. The government has its own AA activities, such as evacuations, and is heavily involved in developing Early Action Protocols for floods and cyclones. Several interviewees commented that the government is 'keen to learn'. Agencies are working to support the Task Force, for example, WFP, BDRCS and German Red Cross conducted a two-day AA orientation for the Task Force in March 2023. In addition, WFP has a deliberate strategy to work more closely with government on AA, beyond the CERF-funded pilot. It has developed a Joint Action Plan with the Ministry of Disaster Management and Relief, which outlines collaborative work on risk mapping and targeting. In this regard, it is possible to argue that AA has already reached sustainability (as some key informants did), as the approach is embedded within government, growing in momentum and seems unlikely to disappear in future.

However, AA is still predominantly led by international actors, and the CERF-funded pilot reflects this approach. In developing the OCHA-facilitated AA framework, the RCO and partners worked with several different parts of central government, including the Ministry of Disaster Management and Relief, particularly the Directorate of Disaster Management; Bangladesh Meteorological Department; the Flood Forecasting Warning Centre; and the Ministry of Fisheries and Livestock. However, most interviewees talked in terms of 'informing' government departments about activities, rather than working with them as co-designers. Core partners of the CERF-funded pilot were not able to identify suitable government officials to interview as part of this research, further suggesting that collaboration had been superficial. Some indicated that engagement with local government had also been limited, suggesting that district-level disaster management actors should be included more consistently.

Reorienting AA design to support government priorities and systems is essential to encourage government leadership at scale in future. Government priorities for AA differ from the way the CERF-funded pilot has been designed. The pilot is designed to trigger for large-scale flooding, and in selected areas, and to release funding for UN-led interventions including cash and in-kind transfers. In contrast, the government is also concerned with smaller and medium-sized shocks; from all types of hazard; nationwide; and supports interventions like evacuations; but is less keen on anticipatory cash or in-kind transfers. Reaching the next stage of scale and sustainability requires consideration of how AA design can adjust to more clearly support these government priorities and systems, including social protection. As one interviewee asked, 'what is government getting out of AA? Until we can answer that we won't see stronger ownership.' If the design of activities, funding, trigger methodology and implementation mechanisms all bypass government systems and focus on different priorities, then future CERF-funded pilots are likely to continue to run in parallel rather than towards government ownership.

Involving development and climate finance more deliberately and strategically could help build government leadership of AA. There has been a striking lack of engagement with development or climate actors as part of the CERF-funded pilot: no interviewees were able to give examples of collaboration, despite lots of discussion on topics that also fall within a development purview, like building shared beneficiary databases and adaptive social protection. Development and climate actors offer large amounts of finance to governments – if this was more closely linked to AA activities, or could be provided as contingent anticipatory finance, it would create a strong incentive for government to strengthen its involvement in and leadership of AA.

DEVELOPING THE TRIGGER TO SUPPORT SCALE AND SUSTAINABILITY

The OCHA-facilitated AA framework adopted a pre-existing trigger for the AA pilot, indicating capacity and reasonable expectation of sustained use in future. The riverine flood trigger was already developed and in use by BDRCS and the Red Cross Red Crescent Climate Centre, who are still very invested in its maintenance and development. Forecast information and impact data were both available, as well as technical capacity from those organisations, meaning that a precise trigger was possible. The trigger is therefore not dependent on the CERF-funded pilot, and is expected to continue and develop, regardless of the pilot.

Government data is incorporated in the trigger mechanism, and work is underway to improve government ownership of the trigger mechanism in the future. The government's Flood Forecasting & Warning Centre (FFWC) provides the early warning forecast information for the trigger, and interviewees stated that a deliberate aim of the collaboration was to build government trust and engagement. Various capacity building efforts are underway with the Bangladesh Meteorological Department (BMD); for example, some separate TA with the OCHA CERF team on incorporating Global Flood Awareness System (GloFAS) data to improve the reliability of local forecasts. Most interviewees felt that a formal Red Cross/BMD partnership should own the model going forward and be responsible for its development, with a gradual and deliberate shift to greater BMD ownership over time.

Despite some technical challenges, the trigger methodology is generally accepted as sufficiently reliable for floods. Compared with the case study on the AA pilot in Nepal, there were fewer complaints about the accuracy of the trigger methodology and the forecasts it uses. However, there are still significant challenges; for example, the FFWC model is outdated and often contradicts the GloFAS forecasts. Flooding in Bangladesh is often the result of high rainfall in India, but there are gaps in transboundary forecasts and data sharing, which hinder accurate predictions of downstream flooding.

Organisations would like a much longer lead time to prepare and activate AA. The trigger methodology originally incorporated two thresholds: 10 days before an expected flood for readiness activities such as pre-positioning, validating beneficiaries and training; and five days before a flood for full activation. The 2022 and 2023 frameworks incorporated a 15-day total lead time to replace the two thresholds. Interviewees repeatedly argued that they needed closer to 10 days for activation, despite the negative impact this would have on the accuracy of the forecasts, as it is hard to mobilise and distribute support in such a short period of time. There was no recognition amongst agencies that reducing the confidence level/probability threshold would require donors like CERF to increase their financial risk tolerance level. It is particularly difficult for agencies distributing in-kind goods with short expiration periods, who felt under pressure to trigger full activation at the 10-day readiness threshold, rather than waiting any longer to start purchasing goods and risk running out of time. Even with cash, some organisations complained that although they had time to distribute prior to the shock, households did not have sufficient time to spend the money before flooding occurred. In this scenario, cash can help to prevent negative coping strategies, but will not be effective for reducing losses or mitigating impact.

There is strong demand for the trigger to become more flexible, but little appreciation of the trade-offs or likely implementation challenges. Bangladesh is very flood-prone, with 20% of the country flooding in a normal year. The CERF-funded pilot covers only riverine flooding, but flash floods are also a major risk. As mentioned above, there was a large flash flood in 2022 in the north east of Bangladesh. The CERF funding for AA was not released because the pre-agreed threshold for triggering the pilot was not reached, given that the pilot did not cover flash flooding or the specific area affected. However, the floods badly affected many people, which created significant criticism for CERF, the agencies involved and AA generally, including from the government. Some agencies involved in the pilot were frustrated that they could not pivot and use the CERF AA funding to offer an early response (albeit not an anticipatory one), alongside organisations like BDRCS who reacted quickly, feeling a moral tension that they had supplies and plans in place but could not activate. (It should be noted that CERF rapid response funding was made available).

This situation has galvanised a view that future AA should be more flexible to different emergency scenarios that arise at short notice, to switch areas and even to change activities. As one interviewee put it, 'we want to be able to change the goalposts,' and another stated it was more important to 'trust the agencies' than to rely on pre-agreed, rigid plans. Increased flexibility was regarded as appealing for government and crucial for future scale and sustainability. Apart from acknowledging that explicit guardrails would be necessary to ensure that funds do not get used up too quickly or channelled to unrelated activities, few interviewees mentioned risks or challenges with this more relaxed approach to AA trigger methodology, instead seeing it as an obvious and necessary evolution.

There is also demand for flexible geographical coverage of AA so that activities can be triggered for localised events, or pivoted to cover other areas. The current approach for the CERF-funded pilot is all or nothing, where all planned activities are activated if thresholds are reached. Some people argued this was too rigid and that it was unlikely the five pre-selected districts would all be the most- or equally-affected areas. There were even requests to remove all geographic constraints on the AA funding entirely. These were accompanied by a view that pre-registration of all vulnerable people across the whole country is unrealistic, so it would be better to allow agencies freedom to provide support nationwide, wherever needed.

There is enthusiasm for Bangladesh to be the first country to attempt a multi-hazard approach to AA. Flooding is not the only hazard in Bangladesh – other climate-related hazards include cyclone and landslide. Many actors, including the RCO and Red Cross Red Crescent Climate Centre, are optimistic about incorporating other hazards, particularly cyclone, into the OCHA-facilitated framework. There is, however, recognition that it is best to start where forecasts are sufficiently reliable, and that is not yet the case for flash flooding and landslide.

Multiple thresholds could be used to mobilise different actors alongside the triggers used for this pilot. Some actors stated they would prefer lower thresholds so that AA triggers more often, noting that this is a popular idea with the government. However, most acknowledged that CERF funding should be for the largest shocks only, but suggested lower thresholds for action could be used by the government or NGOs wanting to anticipate higher-frequency/lower-severity floods.

For Bangladesh, as in Nepal, the pilot relied on a discretionary element within the trigger which is generally viewed as helpful. This functions as a stop mechanism – when thresholds are met, the RCO has the option of manually overriding the trigger and deciding to pause. Generally, there is a strong consensus that the discretionary trigger element is a positive and necessary development. Only one interviewee spoke strongly against the use of any discretionary elements, instead wanting a purely automatic trigger based on hard data. 'Near misses' were reported in both 2021 and 2022, and most actors felt that it was useful to have a human interface for local validation of the trigger, although guidance is needed so that this does not depend purely on the RCO's risk appetite. The aim is still for a process that forces decision-making at a point where a threat is imminent, but a discretionary element allows for some useful flexibility given forecast uncertainty, and supports the overall goal of providing timely support when needed.

Guidance should be developed to manage the risks of incorporating discretion in the AA trigger process. The main risks to incorporating either a stop or an override mechanism are enabling politicised decision-making; running out of money if the trigger is activated more often; and a reputational risk for AA, in that some may interpret greater discretion as a signal the trigger is unreliable, or that AA is open to undue influence and cannot be relied upon to deliver when expected. Most people felt these risks could be adequately managed with transparent protocols setting out who can override the trigger mechanism; under what circumstances; with what information; and in consultation with whom.

Discretionary elements in the trigger design could build ownership and support, especially from the government. Using a trigger ensures that action is the default, unlike with traditional humanitarian response where someone actively has to set the systems to go, which can cause delays. However, governments are likely to prefer more control over activation than a purely science-based trigger allows them, hence a discretionary design is likely to appeal. Although AA should be insulated from political influence, the government could be one of the actors consulted on whether to pause activation or not. This would help build a stronger

connection with government counterparts and may be a more realistic model for the future. As noted above, the government has different priorities from UN agencies regarding emergencies, and this may present a challenge: for example, they may be keener to trigger for a middle-sized crisis. Again, the key would be having clear protocols and criteria – for example, one criterion could be that the government agrees the imminent flood will be a major event.

Developing an AA trigger mechanism to work at scale and be sustainable may therefore require a greater focus on flexibility, and less emphasis on a technically rigorous approach. As one interviewee stated, 'flexibility is the key to scaling up,' and other stakeholders were enthusiastic about taking a less rigid approach. Instead, they advocated for a decision-making process that utilises forecasting and risk information but allows agencies greater choice and flexibility to respond as climate events are forecast. This would be a very different model from the scientific threshold-based approach pursued by the CERF-funded pilot in Bangladesh and by many other AA actors across the region. It suggests a shift is needed away from tightly defined thresholds and plans, to a more flexible approach that empowers implementers to pivot their activities based on multiple, dynamic sources of information.

WORKING TOWARDS SCALED AND SUSTAINABLE ANTICIPATORY ACTION FUNDING

CERF funding is only available for AA pre-positioning (called 'readiness') and activation, but complementary 'preparedness'[9] and longer-term system-strengthening costs also need to be covered. In all countries, CERF funding for AA only covers the costs of readiness and activation, for example, pre-positioning goods once the forecast threshold has been reached and then distributing them to households. These are sometimes referred to as the 'fuel' costs of AA, i.e. costs incurred one the system has triggered. However, there are also associated 'build' costs that are necessarily incurred when designing, preparing and implementing AA. For example, building beneficiary registries, training implementers, and staff time for design and liaison. These investments in operational systems and tools are essential to allow an efficient and coordinated response, and so many interviewees argued that it was not reasonable to exclude them from CERF funding.

Many organisations complained that they struggled to access funding for 'build' or preparedness activities, and had to rely on internal core funding for these. Although agencies understood they would not be able to receive preparedness funding from CERF, several argued that it had created difficulties for them. This was viewed as part of a general underinvestment in preparedness across the sector, and several people emphasised that it is unrealistic to speak of scaling AA without making investments in building the underlying systems. It was repeatedly mentioned that Disaster Response Emergency Fund (DREF) includes money for preparedness, and ECHO are also more flexible. Some interviewees explicitly questioned why CERF donors cannot be pressed to follow the same model and also fund this type of work.

'Build' costs are not necessarily a large proportion of overall AA costs, but they are still significant and have to be covered for AA to be effective. Build costs were estimated by some interviewees to be definitely less than 10% of overall costs, or in the 'tens to hundreds of thousands of dollars' category, rather than costing millions of dollars. Costs were largely related to collective goods such as database registration and validation, and awareness-raising activities. Agency-specific build costs were around selecting vendors and staff time, which could be three to four months for several staff members within a single agency.

Other AA funding is available in Bangladesh, and there is some evidence that the CERF-funded pilot has catalysed more money for AA, but that this takes time. In addition to their own core funding, UN agencies involved in the CERF pilot use money from ECHO and Australia's Department of Foreign Affairs and Trade (DFAT) to support AA activities. Early Action Protocols for the DREF have also been in place for several years and a small amount of Special Fund for Emergency and Rehabilitation Activities (SFERA) funding has been used. For phase two of the pilot, funding directly from CERF covers 80,000 households, increasing to 140,000 households with agencies' own funds added in. This indicates that the pilot has successfully encouraged UN agencies to commit significant amounts of their own internal funding to AA.

The funding model and timelines for transferring funds create difficulties for smaller organisations who do not have their own internal resources or spare capital to cover gaps in funding. Firstly, some organisations argued that allocating 10–15% for readiness was not sufficient and a higher percentage was required for that stage, or that the percentage should be flexible depending on the activity. Secondly, some complained that funds are too slow to arrive – for example, one agency talked of having to use DFAT funding to pay for the pilot's readiness activities and then reimburse later. Similarly, implementing agencies sometimes have different processes and procedures around when they trigger and release funding. For example, some use an earlier readiness trigger to allow more lead time. This obviously introduces a risk that they may not be reimbursed by CERF for activities undertaken, if the pilot's trigger

9 The term 'preparedness' is used here to refer to specific activities to lay the necessary groundwork for AA, rather than general preparedness for disasters (as the term may be used by a wider range of actors) that is closely linked to DRR and resilience-building, and may include longer-term activities such as developing early warning systems, evacuation procedures and facilities.

activation thresholds are not subsequently met. Ultimately, this makes CERF funding more feasible for larger organisations with reserves they can access, and a corresponding risk appetite.

Similarly, CERF's funding approach seems better suited to larger organisations who can stockpile goods or are willing to invest from a no-regrets perspective. In-kind transfers are possible if an organisation can maintain stockpiles. But the readiness lead time is so short that it presents difficulties otherwise, as there is not sufficient time in the readiness phase (up to five days, but may disappear altogether) to purchase and transport goods. For example, this presented a problem in 2022 for FAO, whose planned activity in the OCHA-facilitated AA framework is to distribute animal fodder. This is time-consuming to purchase and cannot be stockpiled because it is perishable. In 2022, FAO thought the CERF-funded pilot's thresholds were going to be met so purchased feed before the trigger was activated, in order to be ready to distribute feed at the right time. However, the pilot's trigger did not subsequently activate, meaning that FAO was not reimbursed for the fodder and also had to make a decision about how to distribute it in a no-regrets activity. This is another example of associated costs that are not reimbursed, which may prevent smaller organisations from getting involved in CERF-funded AA pilots. FAO could have chosen a different modality that was not perishable, but it wanted to take a needs-based approach and this was the preferred option for providing multi-sector support.

There is strong demand for a more coordinated approach to funding that combines preparedness and AA. As mentioned above, AA funding is fragmented across phases and donors. In Bangladesh there are also several different funding mechanisms. Some interviewees requested that all funds are pooled to improve flexibility and coordination, rolling together CERF, DREF, ECHO, SFERA, WFP and other funds into a coordinated pot. This seems unlikely to be achieved in the short term, and would likely bring some challenges. However, it has been included in the UNCT Position Paper on AA referred to above, and was recently raised by the RCO in discussions with donors about how to move forward with a more coherent and integrated approach to funding.

The lack of preparedness funding underscores a problematic lack of integration between AA and development or climate finance. Preparedness costs are likely to have a link to wider DRR and resilience work, and yet AA funding in Bangladesh appears to exclusively come from the humanitarian sector, with no links to development or climate funding. International financial institutions (IFIs) are strikingly absent from discussions on AA in Bangladesh, despite them being a major source of post-disaster finance and investing significantly in infrastructure that has to be protected or rebuilt following disasters.

Developing stronger links with climate and development sectors could unlock greater scale and sustainability for AA funding. IFIs are not yet offering anticipatory finance in Bangladesh or elsewhere in the region. Some people showed frustration that the banks 'just aren't interested,' arguing that governments would be keener on AA if IFI funding was available, and this would potentially be of a greater magnitude than is possible from humanitarian budgets. As one interviewee commented regarding the importance of development finance for AA: 'when the banks come, they change. They don't change how they operate for humanitarians.' Several suggested that World Bank contingent funding for anticipatory social protection would act as a major incentive for government adoption of AA on a grand scale, possibly provided by some of the big global DRF mechanisms like the Global Shield Financing Facility. Another suggestion was wider use of crisis modifiers for AA, connected to development or climate initiatives in the country.

There is potential for government funding of AA in the near future, in addition to amounts already spent prior to disasters. The government already spends considerable amounts of money on preparatory actions to mitigate disasters (albeit not linked to pre-agreed triggers), including evacuations and shelter building. However, it is impossible to track this anticipatory spend as there are no specific budget codes. Agencies are advocating for the government to use its response budgets to pay for activities to complement CERF-funded activities. However, these funds are often difficult to repurpose for pre-disaster response, due to strict regulations on when and how money can be spent. This topic is under active discussion between the Task Force and UN agencies, with work currently underway to set up systems to track anticipatory and preparedness spend, and clarify a way forward on adapting existing funds. Interviewees felt that local-level funding was also a likely source of AA funding in future, given local government resonance with the overall concept of AA.

Changes could be made to CERF funding flows to improve localisation. Some interviewees reflected that CERF's funding model, where funds flow from CERF to UN agencies, then to INGOs and on to local organisations, is both slow and contrary to Grand Bargain[10] ambitions. Allowing local NGOs direct access to CERF funding, even a small percentage, could promote ownership and sustainability; increase innovation; build capacity; and bring AA closer to the community level.

In addition, these organisations all have development and resilience programmes; for example, in relation to agriculture, meaning that AA could be integrated into wider approaches. The aim is not solely to get funding to the local level, but to do so in a way that ensures those organisations are full partners, contributing to design, implementation and reporting.

10 The Grand Bargain is a policy process and set of commitments initiated in 2016 to drive system level improvements in the efficiency and effectiveness of humanitarian action. See: About the Grand Bargain | IASC (interagencystandingcommittee.org)

SHORT-TERM PRIORITIES TO BUILD SCALE AND SUSTAINABILITY IN BANGLADESH

Problems with data sharing between UN agencies need to be urgently resolved. As noted above, the 2020 CERF-funded activation built a desire for a shared beneficiary database between UN agencies, to allow better targeting of services at the most appropriate groups, and unified data analysis. Following a collaborative data collection exercise between agencies, WFP developed, led and housed a database of 130,000 households. In 2022, the agencies tried using the database to assist in a flood response (not part of the CERF-funded pilot) but encountered a number of difficulties, particularly around data sharing. WFP, understandably, has strict protocols about storing and sharing beneficiary data. Without global or country specific data-sharing agreements in place with most of the pilot's partner agencies, WFP cannot share data. Work to resolve this is underway, but there is currently no formal agreement in place. Therefore alternative arrangements would have to be made should the AA pilot trigger, which are likely to take 3–6 months to resolve. This obviously poses a big risk to timely delivery of AA support, and some partners report now resorting to developing their own databases again. It also raises a question around which organisation is best placed to resolve this kind of global coordination problem: is it OCHA or is that outside its remit? There is a limit to the progress that can be made at country level to resolve this kind of inter-agency coordination challenge.

Improvements are needed to data collection and verification processes. In addition to data-sharing difficulties, agencies report a lack of coordination and communication in the data collection process. Different UN agencies were given different geographical areas to collect beneficiary details, according to the required criteria of the partner agencies. Some felt this was not well coordinated and that, as a result, the database does not contain sufficient numbers of beneficiaries that meet their criteria. In addition, there is concern that communication with households around the purpose of the data collection has not been clear enough, leading to raised expectations and subsequent frustration and fatigue as support was ultimately not triggered in 2022. Again, there is a question around which organisation should be responsible for this kind of operational coordination and decision-making in the context of collective AA, particularly when there is no funding available for such activities. Should it be WFP as the owner of the database software and the main user, or the RCO as a designated coordinator?

The RCO should advocate for the pilot to develop stronger links with climate and development actors in country, who have influential relationships with government. There is already a significant amount of activity related to AA and early warning from development and climate actors in Bangladesh. In particular, Bangladesh has been picked as a 'Pathfinder country' by the Global Shield Against Climate Shocks, suggesting that considerable attention and resources will be made available for disaster risk financing and related initiatives in the near future. Engaging these actors, in collaboration with the government and bilateral donors, could unlock considerable resources for government-led AA. Engaging them also offers potential for better integration into wider resilience, preparedness and response activities – for example, long-term programmes to develop social registries that would benefit all actors.

RECOMMENDATIONS FOR FUTURE CERF-FUNDED ANTICIPATORY ACTION PILOTS

Future AA support packages should be based on evidence and analysis of what is needed ahead of a shock and likely to have a meaningful mitigative impact, to be subsequently followed up with broader response support. A significant proportion of the Bangladesh CERF allocation for AA focuses on cash transfers, and so clear evidence is needed that this is still the most appropriate modality, particularly in light of the impact study which notes that 2020 transfer values were too small.[11] In Bangladesh, UNICEF were brought into the second phase to support with WASH, but it is not clear why this sector was prioritised over others. Similarly, some planned AA activities are more suited to response activities; for example, water treatment activities or the distribution of dignity kits. There needs to be fresh consideration of the overall AA package on offer, and an evidence-based rationale for what is included and excluded.

If government leadership of AA is the end goal, as stakeholders expressed, then the pilot's design will need to be adjusted. There was great consensus amongst interviewees in Bangladesh that the government should ultimately lead AA in the country. Bangladesh is not a major recipient of CERF funding, had pre-existing AA programmes, and has a fully functioning government with its own coordinating body for AA. It was selected for a pilot to demonstrate what was possible in a highly climate-vulnerable country, where there was sizeable prior AA experience within agencies. There needs to be a clear longer-term strategy, both in Bangladesh and in similar countries where the government is well-positioned to lead. OCHA should consider how to re-orientate the design of the pilot so that this aim becomes more quickly achievable, and assess whether the right skills and relationships are in place to facilitate this. A different model is likely to be suitable for these high-capacity countries in future, and there may well be compromises to reach this goal. For example, around willingness to switch activities to suit government preferences; giving government a role in decision-making around the trigger methodology and activation; linking with government systems; and expanding coverage.

Consideration is needed of where different roles and responsibilities lie for collective AA action so that important coordinating activities are fulfilled. To date, CERF has provided funding for readiness, activation, some learning activities, and some technical support around triggers. However, the experience in Bangladesh highlights the need for an actor, or group of actors with clearly designated roles, to take responsibility for the wraparound activities, such as ensuring the overall support package is appropriate; liaising with government; coordinating adequate collection of beneficiary data; developing global data-sharing agreements; and ensuring follow-up from M&E studies. A clearer split of roles and responsibilities between OCHA and country-level actors should be articulated, and funded, to ensure they are covered. Some of these roles could be played by a central OCHA team, some by the RCO, and some by appointed lead agencies.

Such coordination and preparedness activities are a core part of successful AA and need to be funded. The current situation where only readiness and activation costs are covered by CERF creates a risk that vital preparedness work is not adequately conducted, for example developing and sharing databases. These are essential, foundational investments. Incorporating funding for AA preparedness would help to clarify what is needed and who is responsible for building systems for AA and coordination. It could also provide an incentive to carry out some of the long-term political and technical capacity building and liaison with government that is necessary for reaching scale and sustainability with AA, but has not been prioritised to date.

There needs to be a deliberate shift beyond a UN-centric approach, and more conscious and strategic outreach to climate and development actors, including local organisations. Whilst government ownership is the vision that most actors articulate for the future of AA in Bangladesh, the current OCHA-facilitated pilot model is unlikely to facilitate that exit strategy, given the actors who have been brought into the process to date and the

11 Pople, A., Hill, R. V., Dercon, S., and Brunckhorst, B. (2021) *Anticipatory Cash Transfers in Climate Disaster Response*, Working paper 6, Centre for Disaster Protection.

pilot's overall design. As well as better engagement with government directly, working more with IFIs, development organisations and climate funds is likely to increase the availability of resources for AA and offer the opportunity to embed AA within a continuum of programming to support communities' overall resilience. This is less about fundraising for OCHA-facilitated AA pilots from climate and development sources, and more about engaging those actors in AA work themselves, so they fund it directly and embed it in their programmatic approaches. Possible entry points for conversations in Bangladesh include linking with programmes aiming to support social protection systems strengthening (particularly for social registries), developing early warning infrastructure, or investigating options in relation to Global Shield pathfinder activities.

Stakeholders are keen for a more flexible trigger methodology and funding approach, requiring a shift in the focus of the pilot and level of technical rigour. Expanding AA in Bangladesh to cover more areas and more hazards would be popular across different types of stakeholders, including with the government: thereby inherently contributing to scale and sustainability. However, this would also likely mean a shift away from strict adherence to pre-agreed plans and scientific-trigger-based approaches. There is clear demand for greater discretion to be embedded within triggers to allow different sorts of information to be incorporated, and less reliance on hard thresholds. AA would therefore become more about allowing agencies access to funds as needed based on a wide range of risk-related information sources, and a coordinated decision-making process. This would require support to build decision-makers' abilities to understand and interpret forecasts and models, and to integrate other relevant information. Robust guardrails would be needed to guide which information should be considered and to ensure funding is used as effectively as possible. This more flexible approach to AA is very different to current approaches being used in the region, by agencies involved in the CERF pilots and beyond, but offers great potential where scale and sustainability is the primary aim.

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Cover image: Country boats on a cloudy day in Bangladesh. Credit: Chobi Wala, Shutterstock.

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