



PRG-FA ASSESSMENT AND TARGETING



World Food Programme

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TARGETING ADVISORY—Issue 5, 2026

*Targeting Assurance Framework – Benchmark #15
Management of Undue Influence*

EXECUTIVE SUMMARY

Within the Targeting Assurance Framework (TAF), undue influence is defined as any improper or unethical attempt by individuals, groups, or organizations to manipulate or interfere with key targeting processes, including the identification and selection of beneficiaries and the determination of eligibility criteria or targeting methodologies.

Such interference compromises impartiality and transparency and poses a direct challenge to humanitarian principles.

The [Targeting Assurance Framework](#) positions the management of undue influence as an essential component of impartial, evidence-based, and people-centred assistance under the TAF Benchmark #15.

INTRODUCTION

Undue influence can arise at any stage of the Targeting and Prioritization cycle, including assessment, design, implementation, and monitoring, and may stem from political authorities, local elites, community power dynamics, or internal pressures.

Effective mitigation depends on strong internal governance, clear and documented decision-making, robust risk-management practices, functional community feedback and appeals mechanisms, and well-defined escalation pathways.

When undue influence is not adequately managed, consequences may include inclusion and exclusion errors, diversion of assistance, erosion of trust within communities, heightened social tensions,

and significant reputational risks for WFP (see p. 24-29 of the [TAF](#)).

Conversely, when risks are identified early and addressed systematically, targeting quality improves, donor confidence is strengthened, and trust with affected populations is reinforced.

From a programmatic perspective, undue influence is not a marginal or hypothetical risk; it can directly affect the overall quality, credibility, and effectiveness of targeting outcomes.

The operational aim of this note is to provide a country-based, interpretation of the TAF benchmarks, to support country offices in strengthening targeting assurance and managing risks of undue influence in practice



KENYA CASE STUDY: UNDUE INFLUENCE IN ANTICIPATORY CASH TRANSFER

During the implementation of WFP's Anticipatory Action Cash Transfer programme in Marsabit and Wajir counties in October 2025, allegations were raised suggesting undue influence over beneficiary targeting. In Dabel, Marsabit County, a complaint alleged that local targeting committee members requested payments in exchange for inclusion on beneficiary lists. Similar concerns in Gurar and Qarari locations in Wajir County pointed to perceived bias, inflated beneficiary numbers, and inclusion of ineligible households, highlighting risks of elite capture and misinformation.

Identification and Response

The allegations were identified through WFP's complaint and feedback mechanisms and escalated immediately. The Country Office, with Area and Field Offices, initiated immediate verification actions, suspending targeting in the affected site. Joint verification missions were conducted, combining desk reviews of beneficiary lists and registry data with household checks and public barazas to validate targeting criteria and community understanding.

Final Outcome

No evidence substantiating the allegations was found. Targeting was confirmed to be transparent, community-validated, and aligned with WFP criteria. The case was closed without escalation, reinforcing the role of rapid verification, transparency, and community engagement as safeguards against undue influence.

ENTRY POINTS FOR UNDUE INFLUENCE ACROSS THE TARGETING CYCLE

The TAF emphasizes that undue influence can enter the targeting process at multiple points and should not be viewed as a risk confined to the final stages of beneficiary selection.

1. **During the assessment and analysis phase**, pressure may be exerted to shape the vulnerability framework in ways that favour particular groups or geographic areas (see Sri Lanka country example on page five).
2. Influence may also be applied to **sampling strategies, survey coverage, or data-collection practices**, including through enumerator bias, which can result in misrepresentation of needs.
3. At the **targeting design and methodology stage**, undue influence may manifest through insistence on the use of non-evidence-based targeting approaches despite the availability of more appropriate options. Political or administrative actors may seek to influence geographic targeting decisions, or eligibility criteria may be adjusted to include or exclude specific sub-groups without a clear,

documented rationale. The framework notes that weak accountability and poorly documented decision-making at this stage can create space for such pressures to shape outcomes.

4. **Power imbalances within communities** can skew validation discussions in favour of dominant groups, while weak or poorly analysed community feedback mechanisms can allow complaints about partiality or favouritism to go unaddressed. If appeals are delayed, ignored, or not systematically reviewed, early warning signals of undue influence may be missed.
5. **During implementation and monitoring**, undue influence may take the form of manipulation of beneficiary lists, selective application of eligibility criteria, or substitution of beneficiaries (as seen in the Kenya cases study). Where monitoring coverage is limited or escalation procedures are unclear or ineffective, such practices may persist undetected, further undermining the integrity of the targeting process.

HOW TO MANAGE UNDUE INFLUENCE

The TAF does not rely on a single control to address undue influence. Instead, it embeds its management within a broader assurance architecture that combines governance, risk management, and accountability to affected populations.

1. A central safeguard within this architecture is the **establishment of a Targeting Working Group (TWG) or equivalent internal governance structure**. The framework requires that such structures have clearly defined Terms of Reference (ToR) that specify

roles, responsibilities, decision-making authority, and escalation pathways. The TWG should be cross-functional, meet regularly, and maintain documented records of discussions and decisions. Crucially, it must be explicitly empowered to address or escalate undue-influence risks, including those involving external authorities.

2. Beyond governance, the framework mandates that undue influence be treated as a **targeting-specific risk within the CO's overall risk-management system**. Risks

should be identified early, ideally before targeting is rolled out, and recorded in the risk register with appropriate mitigation measures. Escalation protocols should be clearly defined in SOPs and aligned with whistleblower protection principles, including provisions for anonymous reporting where appropriate.

3. Data integrity and digitalization are also highlighted as critical mitigation measures. **Limiting manual data handling, ensuring secure data transfer and controlled access, conducting regular data-quality checks, and training staff and partners on ethical data practices** all contribute to reducing opportunities for manipulation.
4. Community engagement is framed not only as an accountability requirement, but also as a risk-management tool. **Inclusive consultations on eligibility criteria, transparent communication of decisions,**

functional and accessible appeals and feedback mechanisms, and timely analysis and response to complaints all help to surface concerns early and prevent the entrenchment of undue influence. The framework explicitly notes that weak community engagement and feedback systems increase the risk of undue influence and community tensions.

5. Finally, the framework stresses the importance of **adequate capacity and clear segregation of roles.** Duties related to targeting implementation should be clearly separated from those related to monitoring and verification. Sufficient staffing and capacity-building for WFP staff, cooperating partners, and targeting committees are essential, as is training on humanitarian principles and access negotiation, particularly in high-risk contexts.

KEY MESSAGES FOR DECISION MAKERS

The Targeting Assurance Framework makes clear that undue influence is not an exceptional or rare occurrence, but a predictable risk that must be managed deliberately and consistently.

Strong governance and visible management backing are decisive factors in preventing and addressing it. High-quality targeting depends as

much on the integrity of processes and decisions as on technical methodologies.

Investing in risk management and governance at the outset protects programme quality, community trust, and WFP's reputation over the long term.



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SRI LANKA CASE STUDY: UNDUE INFLUENCE IN ELIGIBILITY CRITERIA SELECTION

Sri Lanka experienced an unprecedented economic crisis in 2022, driven by a severe foreign exchange shortage and compounded by fuel scarcity, food supply disruptions, and high inflation. Vulnerable groups bore the brunt of these shocks. In response, WFP Sri Lanka, in close collaboration with the Government of Sri Lanka, implemented emergency food and cash assistance programmes to address immediate and medium-term food security needs.

Undue Influence in the Targeting Design

Assessments consistently showed that the estate sector was more vulnerable than urban and rural communities. Structural poverty, persistently low wages, and limited livelihood options rendered estate households particularly exposed to the economic downturn. Rising food prices and reduced tea estate productivity further deepened their insecurity, leading to sharper deterioration in food security outcomes compared to other population groups.

During the design of the targeting approach, WFP engaged extensively with government stakeholders on targeting criteria and assistance values. One proposed exclusion criterion was the presence of regular household income. Although estate households receive regular wages, these are substantially below national minimum income levels and insufficient to meet basic needs. Applying regular income as a rigid exclusion criterion risked systematically excluding a highly vulnerable group despite strong evidence of acute food insecurity. In this context, the criterion functioned as structural undue influence—where administrative norms, applied without contextual safeguards, could override vulnerability-based evidence and distort equitable access to assistance.

Mitigation Through a Score-Based Approach

To address this risk, WFP advocated for a vulnerability-based scoring approach prioritising indicators with a direct and demonstrable influence on food security outcomes. Households were assessed across multiple dimensions, including consumption gaps, coping strategies, dependency ratios, and income adequacy, rather than relying on a single binary income criterion.

Through sustained technical dialogue and empirical evidence, WFP demonstrated that estate sector wages did not confer resilience against food insecurity. The scoring approach enabled identification of deep vulnerability within income-earning households and supported more equitable eligibility determination. Following multiple rounds of consultation, the methodology was endorsed and applied, allowing highly vulnerable estate sector households to access food assistance. The approach strengthened adherence to the **undue influence benchmark** by preventing any single stakeholder priority or administrative assumption from disproportionately shaping outcomes.

Key Takeaways

The Sri Lanka experience highlights the importance of systematically testing targeting decisions against evidence and vulnerability outcomes. Scoring-based approaches, grounded in food security indicators, provided a robust mechanism to mitigate undue influence and uphold equitable access to assistance.



BURKINA FASO CASE STUDY: UNDUE INFLUENCE IN BENEFICIARY SELECTION

Burkina Faso faces significant humanitarian needs, insecurity, and access challenges. Government and local authorities are heavily involved in coordinating humanitarian response. New government policies focused on "food sovereignty" have led to strict regulations on data collection and targeting by aid actors. As a result, WFP's activities were impacted, including the cancellation of important data collection and analysis exercises.

Undue Influence in the Beneficiary Selection Process

Within this challenging operational context, Burkina Faso CO identified cases of undue influence, including attempts by external counterparts to affect beneficiary selection outside agreed vulnerability-based criteria. Notably, WFP was wrongly accused by government authorities of applying subjective criteria—such as ethnicity—in the beneficiary selection process.

These pressures posed significant risks to the impartiality, credibility, and transparency of WFP's targeting, particularly in emergency responses. Constraints on independent data collection, reliance on government-led coordination mechanisms, and direct allegations of bias collectively created an environment in which agreed vulnerability-based targeting principles were at risk of being undermined by political considerations and external interference.

Mitigation Through a Governance Structure and Capacity Strengthening

To mitigate these risks internal targeting governance was strengthened through clearer delineation of roles and responsibilities, alongside systematic reference to WFP targeting standards and the TAF during both planning and implementation.

Where instances of undue influence were identified, these were formally documented and raised with relevant counterparts, ensuring that concerns were addressed at the appropriate level and captured within assurance and benchmarking processes. Targeted internal briefings and discussions were conducted to ensure that programme, RAM, and field teams shared a common understanding of how to identify, manage, and report undue influence, and how to consistently apply agreed vulnerability-based targeting criteria when engaging with external stakeholders. Similar sensitisation efforts were extended to cooperating and targeting partners.

Throughout this process, the CO maintained open and transparent dialogue with government authorities and partners, clearly articulating WFP's targeting methodology, eligibility criteria, and accountability mechanisms, while reaffirming its commitment to principled humanitarian action.

Key Takeaways

Early detection and documentation of undue influence is critical. Internal alignment reduces vulnerability to external pressure. Corporate guidance gives staff a strong basis to push back. Transparent communication remains essential throughout.



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