ICMC OPERATIONAL FRAMEWORK ON ACCOUNTABILITY TO AFFECTED POPULATIONS AND PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (AAP/PSEA)

In Country Approver
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The International Catholic Migration Commission (ICMC) has revised its Operational Framework on Accountability to Affected Populations (AAP) to align it to the 2017 Inter-Agency Standing Committee (IASC)'s revised <u>four</u> commitments, which now address both Accountability to Affected Populations (AAP) <u>and</u> Protection from Sexual Exploitation and Abuse (PSEA). The IASC's four commitments are included in Annex I to this Operational Framework and comprise the following:

1. Leadership;

2. Participation and Partnership;

3. Information, Feedback and Action;

4. Results.

As a Catholic-inspired organization working with and on behalf of uprooted and migrant populations including refugees, asylum seekers, internally displaced people, victims of human trafficking and migrants, ICMC is committed to hold itself accountable to people and families it assists and specifically aims to prevent misconduct and to safeguard vulnerable populations. (cf. the ICMC Code of Conduct). ICMC's accountability to affected populations is rooted in an approach which ensures ongoing, transparent and open communication with beneficiaries in order to develop a relationship that encourages open feedback.

ICMC recognises the value of a community-based approach where beneficiaries are effectively put at the centre of key decisions which affect their lives, and can act as agents of positive social changes within their own communities and families. By ensuring that all segments of affected populations have equitable and non-discriminatory access to ICMC programs and by regularly consulting beneficiaries and allowing them to meaningfully participate in decisions that affect their lives, ICMC ensures that its humanitarian actions and responses are accountable.

This revised AAP/PSEA Operational Framework aims to make programming at the field level more accountable to affected populations, and to ensure that accountability is effectively integrated in all program cycle phases. The revised Framework is designed to provide ICMC Program Staff with key concepts, accountability activities and indicators which shall assist in making programming more accountable to affected people and enable improved participation, information provision, feedback and complaints handling.

1. Leadership

ICMC has put in place a comprehensive set of safeguarding policies. The revised Code of Conduct adopted in April 2019 reinforces ICMC's commitment to a zero-tolerance policy on sexual

exploitation, harassment and abuse (SEA) and related obligations of staff and other persons affiliated with ICMC. In addition, ICMC's revised and amended Policy on Protection from Sexual Harassment Exploitation and Abuse (PSHEA), aims to further promote and strengthen prevention, accountability to affected populations and compliance, and to outline key responsibilities with regard to staff behavior in order to prevent sexual exploitation and abuse. Both polices apply to all ICMC Staff, which are defined as all permanent and temporary employees, consultants, persons related to governance bodies and/or related to ICMC affiliated offices, subsidiaries and branches, interns, observers, volunteers, visitors, and all individuals working for or representing ICMC.

Safe and effective complaints procedures are in place and ICMC takes appropriate disciplinary action against staff following confirmed violation of the Code of Conduct and PSHEA Policy.

To ensure that Staff is sensitized on the importance of AAP and PSEA, prevention and response to SEA have been incorporated into staff induction trainings and further extended within partnership agreements which are concluded with operational partners. A focal point person on protection from SEA is designated in each ICMC field locations, in line with ICMC policies. Regular trainings/refreshers are conducted for Program Managers and Head of Country Offices on complaints mechanisms and procedural safeguards. Learning resources (i.e webinars, handbooks, online trainings, guidelines) are made avalailable for staff on AAP, PSEA and feedback mechanisms.

In recognition of the fact that accountability to affected populations is also dependent on accountability to, and support of staff, ICMC continuously strives to prepare and support staff in carrying out their role effectively, in particular when working in insecure environments. To this effect, ICMC provides an independent and confidential counselling service as an immediate form of assistance for ICMC staff who is experiencing work-related psychosocial stress. The Trusted Office Mentor (TOM) is designed to prevent work-related psychosocial risks arising as a result of chronic stress, serious interpersonal conflict in the workplace, mobbing, harassment or violence at the work place.

ICMC maintains a gender balance among its staff, ensuring that male and female staff are available to interact with beneficiaries.

2. Participation and Partnership

Participation of affected people in all needs assessment is systematically included, as well as during monitoring, review and evaluation processes and due consideration is given to gender, age, diversity and special needs of affected populations, making sure that the most marginalised and vulnerable persons have a voice in the process. Separate focus groups are hosted for Women, Girls, Boys, and Men (WGBM), including adolescents, with content uniquely designed for each category to mitigate potentially negative effects of altered or damaged gender roles. Through these separate discussions, ICMC is able to gather information on specific protection risks that different groups may face. Whenever possible, ICMC participates in multisectoral, joint or inter-agency

assessments, with an aim to improve the quality of assessments and to reduce the burden on affected communities.

In all its programs and activities, ICMC seeks to ensure the respect for local cultures, customs, and traditions of all people and display cultural sensitivity and openness to host communities and countries.

Partnership agreements explicitly refer to accountability and quality commitments and are developed through a collaborative process with both international and local partners.

3. Information, Feedback and Action

ICMC facilitates the provision of feedback from affected people on the services and protection offered, including through the complaints mechanism, and the collection of regular feedback upon distribution and/or service delivery. The information gathered through feedback is used to determine ways in which the services/assistance being provided can be improved or modified to better meet the needs of beneficiaries. All such feedbacks are also shared with the implementing partners or service provider(s) to ensure that they are equally informed too and can adjust accordingly. Besides that, the accountability system includes regular visits and calls to beneficiaries to develop a relationship that encourages an open dialogue, invitations to contact the program staff, and complaints boxes at the offices and program site locations.

Information to affected people about services and support available is provided in local languages and in the event of emergency situations, information on availability and nature of responses is systematically communicated to affected populations using relevant communication mechanisms. To prevent potential exploitation and abuse of beneficiaries by staff or other related parties, communities, partner organisations and their staff, beneficiaries as well as other related parties are included in awareness-raising sessions and information-sharing on expected behaviour. Messages are displayed to inform all stakeholders that ICMC assistance is free of charge, and that no money or services can be requested from them. These messages are accessible and understandable to all, translated into relevant languages and placed in visible locations. Consideration is given to illiterate populations through drawings communicating that ICMC services are free of charges and including details on how to submit a complaint.

ICMC strictly prohibits and applies a zero-tolerance policy toward any form of sexual harassment, exploitation and abuse, including emotional, verbal, physical or sexual, by its staff, in all the organization's activities and responsibilities, at the organizational or program level.

ICMC recognizes the sensitivity of SEA allegations and, therefore, the importance of a victim-centred approach when receiving, investigating and responding to safeguarding concerns. It is therefore key to share good practice models, experiences, and resources on survivor support approaches with and from other key stakeholders and to learn and benefit from survivors' experiences to improve the support we can provide and the procedures we implement.

Cooperation with other organizations for providing in-country support services for survivors of sexual violence need to be explored, recognizing the potential added value of providing legal support to potential victims and survivors during and after the administrative or legal investigation process. Victim's assistance and support, including psycho-social support, should be provided in the event of a confirmed SEA incident.

4. Results

Whenever possible, ICMC programs and project proposals are designed to incorporate AAP into the respective indicators. The results and findings are communicated in project progress reports to donors and stakeholders.

ICMC continuously reviews its programs and results to ensure that the "Do No Harm" approach is maintained and that proposed interventions are not exacerbating conflict or causing unintended harm to beneficiaries.

Any whistleblowing alerts or other allegations received on sexual abuse, exploitation or harassment are systematically reviewed, investigated and documented. As part of ICMC's commitment under the InterAction "CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO staff", ICMC promotes a reporting culture that supports confidential reporting of all allegations of misconduct, with regular updates to the Secretary General.

ICMC also commits to continuously reviewing existing policies on sexual abuse, exploitation and harassment and to make further improvements or take corrective action based on lessons learned.

ICMC AAP/PSEA Operational Framework

Program cycle phase	Activities/collection and analysis techniques	Use of feedback in programming strategies	Means of verification
Throughout all phases of the program cycle	Mainstream accountability and PSEA commitments into recruitment and training; Teams are recruited with attention to a balance of women and men, cultural diversity and age; To prevent SEA as effectively as possible, job vacancy announcements include a statement of commitment to PSEA and mandatory questions related to behavioural issues are asked during recruitment. Staff, volunteers and consultants, both national and international, are provided with adequate and timely inductions, briefings, and clear reporting lines that promote positive organisational behaviours and enable staff to understand their responsibilities, work objectives, organisational values, accountability commitments, key policies and local context.		Examples of job description; example of trainings conducted; HR policies and procedures manual.
During needs assessment	Representatives of local communities (including the most vulnerable and disadvantaged community members) and other local stakeholders are invited to participate in the assessment; Focus Group Discussions and Key Informant Interviews are organized to allow for separate and confidential discussions with different community groups (including gender and age	Targeted population is involved in the needs assessment to explore communities' beliefs, values, understandings, range of opinions and ideas, practices, experiences, contextual factors, inconsistencies and variations, perspectives, needs	Consultant ToRs, needs assessment report with methodology used, outreach questionnaires, participation of community representatives (the way they assisted in the conduct of the assessment as well as in the provision of information), number and types of community groups, evidence of captured feedback (FGD and interviews reports), information gained from

	disaggregated groups); Feedback and formal complaints mechanisms are designed and implemented; Concerned population is informed about the mission of the organization, the values and the principles it adheres to.	and priorities	communities.
During project design	Findings of assessment(s) are shared with affected communities and local authorities; Assessment results are used in the design of projects; Formal complaints and feedback mechanisms are in place and are tailored to local communities.	Targeted population is involved in the project design to propose activities in line with their needs.	Records of meetings with communities, attendance sheets, record of engaging interpreters; complaints mechanisms procedures.
During project implementation	Accountability/SEA commitments are integrated into recruitment and training: job descriptions, ToR, staff performance appraisal, induction sessions for new staff, partnership agreements; Staff technical and behavioral competencies for accountable programming is maintained; Representatives of local community groups participate in developing criteria for selection of beneficiaries; drafting of selection criteria and beneficiary selection process is transparent; Communication with affected populations is tailored to the local context. Communications are done in languages, formats and media that are easily understood, respectful and cultural appropriate;	Staff is able to communicate and receive feedback from communities to adjust project implementation; Representatives of local community groups can support the project teams in case of any obstacles encountered in the field; Feedback mechanisms are used to gather feedback on the quality and accountability of	HR policies and procedures manual, training records; Attendance sheets/minutes of community meetings, record of engaging interpreters; Distribution lists of information leaflets to the affected populations, copies of translations; Documentation of established complaints and feedback mechanisms, with evidence of responses provided; Analysis of feedback and complaints (trends in number and type of complaints and feedback received);

		the response;	Random desk review of complaints and field teams' responses by HQ support staff to evaluate the responses to complaints.
	Feedback mechanisms are implemented for people to express views and concerns on the organization's approach, activities and impact; Formal Complaints mechanisms are in place to receive and address all complaints (including sensitive issues such as SEA) Complaints are managed in a timely , fair and appropiate manner and feed back provided to the affected beneficiary.	Responses to serious concerns and complaints are provided; When relevant, feedback collected from beneficiaries are shared across aid-organizations and/or relevant coordinated participation mechanism.	
During distribution and service delivery	Local communities and beneficiaries are informed in advance of the date and location for distribution / service provision, security allowing.		Post-distribution/post-service delivery questionnaires.
During monitoring	Local community representatives are invited to take part in monitoring processes; Findings are shared and discussed with local communities representatives.	Project design is adjusted according to community feedback	Field visits, calls to beneficiaries, questionnaires.

2017 IASC Commitments on Accountability to Affected People and Protection from Sexual Exploitation and Abuse

https://interagencystandingcommittee.org/system/files/iasc_caap_endorsed_nov_2017.pdf

The IASC Principals commit to:

1. Leadership:

Demonstrate their commitment to Accountability to Affected Populations (AAP) and Protection from Sexual Exploitation and Abuse (PSEA) by enforcing, institutionalising and integrating AAP approaches in the Humanitarian Program Cycle and strategic planning processes, at country level and by establishing appropriate management systems to solicit, hear and act upon the voices and priorities of affected people in a coordinated manner, including for SEA, before, during and after an emergency.

2. Participation and Partnership

Adopt agency mechanisms that feed into and support collective/coordinated people-centred approaches that enable women, girls, boys, men, including the most marginalised and at-risk people among affected communities, to participate in and play an active role in decisions that will impact their lives, well-being, dignity and protection. Adopt and sustain equitable partnerships with local actors to build upon their long-term relationships and trust with communities.

3. Information, Feedback and Action

Adopt agency mechanisms that feed into and support collective and participatory approaches that inform and listen to communities, address feedback and lead to corrective action. Establish and support the implementation of appropriate mechanisms for reporting and handling of SEA-related complaints. Plan, design and manage protection and assistance programs that are responsive to the diversity and expressed views of affected communities.

4. Results

Measure AAP and PSEA related results at the agency and collective level, including through standards such as the Core Humanitarian Standard and the Minimum Operating Standards on PSEA; the Best Practice Guide to establish Inter-Agency Community-Based Complaint Mechanisms (CBCM) and its accompanying Standard Operating Procedures.

The IASC Principals agree to be held accountable for the progress on fulfilling these commitments.

Background: In 2011, the IASC principals agreed to five Commitments on Accountability to Affected Populations (CAAP) as part of a framework for engagement with communities. The revised version was developed and endorsed by the IASC Principals on the 20th of November 2017 to reflect essential developments such as the Core Humanitarian Standard (CHS), the work done by the IASC on Inter-Agency community-based complaints mechanisms including PSEA and the importance of meaningful collaboration with local stakeholders, which came out as a priority recommendation from the 2016 World Humanitarian Summit and in the Grand Bargain.