

ACCOUNTABILITY TO AFFECTED POPULATIONS FRAMEWORK



IOM is committed to the principle that humane and orderly migration benefits migrants and society.

As an intergovernmental organization, IOM acts with its partners in the international community to: assist in the meeting of operational challenges of migration; advance understanding of migration issues; encourage social and economic development through migration; and uphold the human dignity and well-being of migrants.

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Cover photo: In March 2019, more than 70 per cent of Kibabi's population in Masisi, Democratic Republic of the Congo did not feel safe enough in their home areas and wanted more opportunities to integrate in the host community. © IOM 2019/Muse MOHAMMED

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1. INTRODUCTION

The *Accountability to Affected Populations (AAP) Framework* establishes the International Organization for Migration's (IOM) common approach for implementing and mainstreaming AAP throughout its crisis-related work as contained in its Migration Crisis Operational Framework (MCOF). It helps the Organization ensure quality and responsive programming in line with the evolving needs of beneficiaries, affected populations and communities and enforce the Organization's zero tolerance against sexual exploitation and abuse (SEA) and other misconduct. The commitments of this framework were developed in line with the Inter-Agency Standing Committee's (IASC) commitments to AAP and adapted to meet IOM's operational realities.

Adherence to the framework's principles and achieving its commitments and objectives are mandatory. There are many ways to implement and mainstream AAP, and such efforts need to be contextually relevant. Therefore, the framework is to be read in conjunction with the guiding *IOM Accountability to Affected Populations Toolkit*, which aims to help IOM staff identify and tailor AAP interventions. The toolkit's suggested actions and use of the templates are highly recommended. The toolkit is updated as appropriate. Staff should also seek out other IOM specialized guidance, tools or trainings that complement this framework and cover AAP for specific thematic or operational areas, such as those developed for staff working on resettlement and movement management.¹

The IOM AAP Framework is grounded in prevailing global and institutional principles and draws from established good practices throughout relevant IOM and inter-agency operations. The framework directly supports implementation of MCOF (MC/2355); IOM's Humanitarian Policy – Principles for Humanitarian Action (C/I06/CRP/20); IOM Standards of Conduct (IN/15, Rev. 1); Guidance Note on how to mainstream protection across IOM crisis response (IN/232); Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse (IN/234); IOM Gender Equality Policy 2015–2019 (C/I06/INF/8/Rev.1); IOM Data Protection Principles (IN/00138); and IOM Reporting and Investigation of Misconduct Framework (IN/275); as well as reinforces the implementation of the “We Are All In” reporting platform.²

Many aspects of AAP are considered best practice even in non-crisis contexts and could have wider applicability for IOM's work. Other aspects of AAP are matters of institutional governance. However, this framework is operationally driven and directly responds to IOM's established obligations and commitments on AAP as a member of the humanitarian community. Given MCOF and the comprehensive scope of IOM's work across the crisis spectrum, this framework also applies, as appropriate, to its transition, recovery and other stabilization programming, risk reduction activities and movement operations.

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1. The Resettlement and Movement Management (RMM) Division commissioned specialized guidance resulting in Minimum Standards Governing the Mainstreaming of Protection in Resettlement Operations (2018), in addition to an RMM-focused toolkit for mainstreaming AAP and protection frameworks, all accessible via the RMM portal.
 2. Weareallin.iom.int is a resource database and a reporting platform to receive complaints on all forms of misconduct, including those relating to sexual exploitation and abuse. Available at <https://weareallin.iom.int/>.



2. KEY TERMINOLOGIES AND SCOPE

The terms listed convey how they are used and understood for the purposes of this framework. In some cases, the explanation provided is narrower than the term's broader meaning, or the explanation has been simplified or adapted to clarify its specific relevance to AAP and/or to IOM's approach to AAP.

- **Accountability to affected populations:**

IOM adheres to the IASC understanding of AAP, which defines it as “an active commitment by humanitarian actors to use power responsibly by taking account of, giving account to and being held to account by the people they seek to assist”.³

- **Accountability:**

There are multiple levels of accountability. IOM is accountable to its Member States, including those affected by crisis as well as donors, in accordance with its Constitution. As a related organization of the United Nations, IOM likewise aligns its activities in accordance with the Purposes and Principles of the UN Charter and with due regard to the policies of the UN. Within the humanitarian system, there are obligations and commitments that make humanitarian actors accountable to the people they seek to assist. These different levels of accountability are not mutually exclusive, with many donors, many of whom are signatories to the Grand Bargain, increasingly requiring AAP to be incorporated into humanitarian programming.

Collective accountability: There is no commonly agreed-upon definition of collective accountability; however, the term is often used in recognition that multiple humanitarian actors are engaged in joint programming, provide common services and pursue collective outcomes. All actors involved in such joint efforts are required to ensure AAP obligations and commitments are upheld.

- **Affected populations:**

This refers to people in crisis-related contexts whom IOM seeks to assist under MCOF, which also includes those at risk of being affected by a crisis. It also includes communities and those that benefit from community-based programming, whether they host affected populations or are communities of origin/return/transit or at risk.

- **Complaints and feedback mechanism (CFM):**

This is a process for receiving feedback and responding to complaints from people affected by crisis or those impacted by IOM's presence and assistance. CFMs foster quality and responsive programming and help build trust and stronger partnerships with communities. It further creates a safe space for communities to willingly report issues that require the Organization to inquire, investigate and/or follow up.

3. Inter-Agency Standing Committee (IASC), The essential linkages between accountability to affected populations (AAP) and prevention of sexual exploitation and abuse (PSEA). Brief overview for AAP, 2 pager, December 2015. Available at https://interagencystandingcommittee.org/system/files/aap_psea_2-pager.pdf.



- **Diversity inclusion (vulnerable and marginalized groups):**⁴

Women, children, LGBTI,⁵ the elderly, people with disabilities, ethnic and religious minorities, among others, may face constraints in accessing services or receiving assistance or be unintentionally excluded from receiving assistance. They may also experience varied forms of discrimination and have unique or heightened vulnerabilities, which may be aggravated during a crisis. They may also have unique capacities and agency that should be taken into account.

- **Operationalizing AAP:**

- a) **Mainstreaming AAP:** The primary objective of this framework is to mainstream AAP. Mainstreaming is the process of incorporating the AAP principles and commitments in strategies and programmes to help achieve quality, safe and accountable crisis-related response.
- b) **Stand-alone AAP:** More typical for inter-agency common service projects, these are single-project activities that contribute to an organization's own AAP mainstreaming efforts and are linked to collective accountability. A stand-alone AAP intervention may concern specific programmes where the project scope is defined: examples could be a call centre or humanitarian hotline. However, responding to a complaint received through a complaints hotline implemented in the context of a protection programme, for instance, is not an exclusive responsibility of the protection officer but rather a responsibility of all sectoral programmes concerned.

- **Participation:**

This is a process in which individuals and groups are consulted about or have the opportunity to become actively involved in the design, implementation and evaluation of a project or programme activity. Meaningful participation is inclusive of diverse groups of people, particularly the most vulnerable and marginalized, enabling them to influence decision-making processes in the entire project cycle.

- **Power differential:**

It is the unequal power relationship that exists between an organization and its staff and a crisis-affected individual or group in need of humanitarian and other crisis-related assistance. The Organization inherently stands in a position of power as they can exert influence by withholding aid or promising rewards in exchange for certain behaviours.⁶ Unchecked, the power imbalance can result in abuses of power as in cases of SEA. It is also about ensuring diverse population groups participate and influence decision-making on an equal footing.

4. In resettlement operations, diversity inclusion is commonly reflected through an age, gender and diversity (AGD) approach as defined by the IASC Global Protection Cluster (www.globalprotectioncluster.org/themes/age-gender-diversity/).

5. Lesbian, gay, bisexual, transgender or intersex.

6. Agnes Callamard, "Humanitarian power and accountability", International Federation of Red Cross and Red Crescent Societies, 15 March 2002. Available at www.ifrc.org/fr/nouvelles/nouvelles/common/humanitarian-power-and-accountability/.

- **Sexual exploitation and abuse:**

This refers to particular forms of gender-based violence that have been reported in humanitarian contexts, specifically alleged against humanitarian workers.⁷

- a) **Sexual exploitation:** This is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- b) **Sexual abuse:** This is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- **Transparency:**

This is providing accessible, appropriate and timely information to affected populations about decision-making processes affecting them. It is one of the cornerstones of accountability; it helps build trust that facilitates two-way communication between parties. It involves sharing of information in the most appropriate manner and in the language understood by a diverse group of stakeholders.

- **Two-way communication:**

This is also known as “community engagement” and “communicating with communities”, which refer to an interactive process in which information is shared and feedback actively received (that is, closing the feedback loop).

3. RATIONALE

IOM saves lives, alleviates suffering and assists and protects all vulnerable groups and mobile populations affected by crisis. The needs and rights of individuals and communities are at the core of its operations, and it is to these populations whom IOM’s humanitarian and other crisis-related work is accountable.

Engaging affected populations and communities in programme processes and decision-making promotes quality and responsive programming. Designing programmes and adjusting their implementation based on people’s inputs and views help ensure the correct identification of needs, as well as the contextual suitability and appropriateness of programmes. Failing to engage affected populations and/or communities in the responses and solutions that affect them in a timely manner not only risks jeopardizing the success or efficacy of the programme or activity, but it can also corrode trust between the Organization and the people it serves, and could contribute to or fuel otherwise preventable tensions, violence or conflict.

The purpose of AAP also is to take into account and remove the inherent power differential between aid providers (IOM staff members and implementing partners) and the populations and communities they are tasked to assist. When left unchecked, this fundamental imbalance can undermine the rights and dignity of the affected populations, including their right to have a say on how they should be helped (what, how and to whom aid is delivered). It also can foster abuse of power, including with respect to SEA.

7. Inter-Agency Standing Committee, Standard Operating Procedures, Inter-Agency Cooperation in Community-Based Complaint Mechanisms Protection against Sexual Exploitation and Abuse (2016). Available at https://interagencystandingcommittee.org/system/files/global_standard_operating_procedures_on_inter_agency_cooperation_in_cbcms.pdf.

4. ACCOUNTABILITY TO AFFECTED POPULATIONS AND THE BROADER HUMANITARIAN ARCHITECTURE

AAP has featured on the humanitarian agenda for over two decades, initially known as “accountability to beneficiaries”. The shift to “accountability to affected populations” takes into account that assistance not only affects the aid recipients but also the wider community. It aims to see affected populations as partners rather than as passive beneficiaries, recognizing their dignity and capacities and empowering them in the efforts that matter to them.

AAP gained particular prominence through the Transformative Agenda (2011),⁸ and the World Humanitarian Summit (2016) commitments, including the Grand Bargain (2016). These initiatives helped develop a shared understanding of AAP within the international community and resulted in a range of collective as well as individual institutional commitments that aim to include people receiving aid in making the decisions that affect their lives, foster meaningful collaboration with local stakeholders and prevent sexual exploitation and abuse.

YEAR	KEY DEVELOPMENTS IN ACCOUNTABILITY TO AFFECTED POPULATIONS WITHIN THE HUMANITARIAN ARCHITECTURE
2011	IASC Principals agree on key AAP commitments: (a) leadership/governance; (b) transparency; (c) feedback and complaints; (d) participation; and (e) design, monitoring and evaluation, further agreeing to incorporate the commitments in their respective policies and operational guidelines and promote them with operational partners, within Humanitarian Country Teams (HCTs) and among cluster members.
2012	IASC develop an operational framework that became one of 10 Transformative Agenda protocols.
2014	Core Humanitarian Standards (CHS) on Quality and Accountability, which prominently features AAP, were launched. The content of the CHS and IASC AAP commitments are mutually reinforcing. IOM is not a signatory of the CHS; however, the cluster system (to which IOM participates) adheres to the Sphere Standards that adopted the CHS.
2016	Grand Bargain is agreed, involving some of the largest donors and aid providers. Included among its thematic workstreams is the Participation Revolution to “include people receiving aid in making the decisions which affect their lives”.
2017	IASC Principals adopted revisions to the operational framework.
2019	IASC forms the Results Group on Accountability and Inclusion, to which IOM is a member. It falls under the oversight of the Operational Policy and Advocacy Group. Aimed at facilitating collective approaches, the Results Group provides guidance, including to HCTs, on AAP relevant policies, develops tools and determines the IASC’s annual AAP priorities.

8. A series of system-wide humanitarian reforms led by the IASC and Emergency Relief Coordinator.



At the country level, the Humanitarian Coordinator and HCTs (and Resident Coordinators and UN Country Teams, as appropriate), which IOM is a member of, are ultimately accountable to the people in need. HCTs integrate AAP into humanitarian programme cycles. In doing so, they help to ensure populations inform humanitarian needs overviews (HNO) and Humanitarian Response Plans (HRPs). Relevant efforts could include community perceptions surveys, community feedback, participation activities and focus group discussions, among others.

Examples of practical IOM contributions to the HCT's collective approach to AAP include IOM data through the Displacement Tracking Matrix (DTM) and surveys feeding into HNOs; and IOM as cluster (co)lead's preparations of Cluster Response plan, which inform HRPs. IOM sometimes leads AAP working groups (also known as "communicating with communities" or "community engagement working groups") that bring in community views at the inter-cluster coordination level. Various country offices will contribute differently depending on their respective capacities, contexts and strategic priorities.

5. IOM POLICIES AND FRAMEWORKS RELEVANT TO ACCOUNTABILITY TO AFFECTED POPULATIONS

IOM's foundation for action on AAP is firmly established in several key IOM strategic documents (see Table 1). The AAP Framework brings these provisions together for a consolidated institutional approach. In turn, the framework goes further by providing the principles, commitments and guidance necessary to help the Organization effectively implement the AAP components of such policies and frameworks.

Given the AAP Framework is mandatory, all future relevant policies, framework and strategic documents must adequately represent and take the IOM AAP Framework into account.

Table 1. IOM strategic documents relevant to accountability to affected populations

IOM POLICIES AND FRAMEWORKS	PROVISIONS RELEVANT TO ACCOUNTABILITY TO AFFECTED POPULATIONS
MIGRATION CRISIS OPERATIONAL FRAMEWORK (MC/2355) ⁹	<ul style="list-style-type: none"> • MCOF anchors IOM's comprehensive, multidisciplinary response to crisis. It establishes the overall basis for policy-level work and houses all of IOM's other crisis-related policies, frameworks or tools. It sets out sectors of assistance that should be considered across the crisis spectrum (before, during and after). • It applies when assessing, designing, developing, endorsing, implementing, monitoring and evaluating IOM's crisis-related projects. AAP needs to be factored in throughout all of IOM's crisis-related response as framed under MCOF.

9. International Organization for Migration (IOM), IOM Migration Crisis Operational Framework (MC/2355) (2012). Available at <https://dmsportal/sites/GOV/CouncilDocuments/101%202012/MC2355%20-%20E%20-%20new.pdf#search=Migration%20Crisis%20Operational%20Framework>.

IOM POLICIES AND FRAMEWORKS

PROVISIONS RELEVANT TO ACCOUNTABILITY TO AFFECTED POPULATIONS

HUMANITARIAN POLICY – PRINCIPLES FOR HUMANITARIAN ACTION (C/106/CRP/20)¹⁰

- IOM commits to promoting and respecting the humanitarian principles and outlines specific contexts for which IOM adopts principled positions to help determine its role.
- In its humanitarian response, IOM is accountable to the persons and States concerned, its Member States, donors and its partners within the humanitarian response system. IOM is committed to strengthening its accountability mechanisms and keeping them under continuous review (II.12).
- IOM's accountability for its humanitarian action ensures that activities are carried out responsibly, meet the needs of those affected and limit the possibility of abuse and diversion of aid (II.14): (a) meeting international standards for AAP throughout its response by, inter alia, integrating feedback mechanisms and participatory processes (II.14.a); (b) developing and engaging in mechanisms to solicit feedback and receive and address complaints from the communities concerned (II.14.b); and (c) ensuring that its interventions are inclusive and build trust and confidence with the communities concerned (II.14.c).
- IOM is committed to acting with accountability, transparency, efficiency and effectiveness vis-à-vis its donors whenever it implements humanitarian action, for the benefit of the groups of people concerned (II.16).
- IOM is committed to IASC efforts to improve the effectiveness of principled humanitarian action and strengthen accountability across the humanitarian system, from the country level – including as a member of HCTs – to the regional and global levels, as an active participant in IASC-led processes and initiatives (II.17).

GENDER EQUALITY POLICY (C/106/INF/8/REV.1)¹¹

- Monitoring tools, such as gender markers, protection mainstreaming checklists and cluster standards, will be used to assess the adherence of the humanitarian response to diversity and inclusion considerations, with remedial action taken as needed.
- Other accountability mechanisms such as CFMs established according to response goals will contribute to assessing and redirecting responses accordingly (par. 41).

10. IOM, IOM Humanitarian Policy – Principles for Humanitarian Action (C/106/CRP/20) (2015). Available at www.iom.int/sites/default/files/our_work/DOE/humanitarian_emergencies/IOM-Humanitarian-Policy-Principles-on-Humanitarian-Action.pdf.

11. IOM, IOM Gender Equality Policy (C/106/INF/8/Rev.1)(2015). Available at <https://dmsportal/sites/GOV/CouncilDocuments/106%202015/C-106-INF-8Rev.1%20-%20IOM%20Gender%20Equality%20Policy%2020152019.pdf#search=Gender%20Equality%20Policy%20C%20106>.



STANDARDS
OF CONDUCT
(IN/15, REV. 1)¹²

- IOM staff members shall provide humanitarian assistance and services in a manner that respects and fosters the rights of beneficiaries. For this reason and because there is often an inherent and important power differential in the interactions between staff members and beneficiaries, IOM strongly discourages staff members from having any sexual relationships with beneficiaries (5.42).
- IOM staff members shall protect against and prevent SEA of beneficiaries. Abusive and exploitative sexual activities with beneficiaries are absolutely prohibited (5.42).

POLICY AND
PROCEDURES FOR
PREVENTING AND
RESPONDING TO
SEXUAL EXPLOITATION
AND ABUSE (PSEA)
(IN/234)¹³

- Zero tolerance of SEA by IOM staff members and the employees or any other persons engaged and controlled by IOM contractors. (1)

GUIDANCE NOTE ON
HOW TO MAINSTREAM
PROTECTION ACROSS
IOM CRISIS RESPONSE
(IN/232)¹⁴

- IOM enables affected individuals and communities to play an active role in the measurement of the quality of interventions that affect them and actively seek their views to improve policy and programming, through addressing concerns and complaints (9(iii)).
- IOM fosters inclusive participation to decision-making processes, builds on affected individuals and communities' capacities in the development and delivery of services and relief and supports the development of self-protection capacities while assisting people to claim their rights (9(iv)).

12. IOM, IOM Standards of Conduct (IN/15, Rev. 1) (2014). Available at intranetportal/Pages/ControlNo.aspx?controlNo=IN/00015.

13. IOM, IOM Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse (IN/234) (2016). Available at <https://intranetportal/Pages/ControlNo.aspx?controlNo=IN/00234>.

14. IOM, IOM Guidance Note on how to mainstream protection across IOM crisis response (IN/232) (2016). Available at <https://intranetportal/Pages/ControlNo.aspx?controlNo=IN/00232>.

IOM DATA
PROTECTION
PRINCIPLES (IN/00138)¹⁵

- Consent must be obtained at the time of collection or as soon as it is reasonably practical thereafter, and the condition and legal capacity of certain vulnerable groups and individuals should always be taken into account. If exceptional circumstances hinder the achievement of consent, the data controller should, at a minimum, ensure that the data subject has sufficient knowledge to understand and appreciate the specified purpose(s) for which personal data are collected and processed. (4)

IOM REPORTING AND
INVESTIGATION OF
MISCONDUCT
FRAMEWORK (IN/275)¹⁶

- With the exception of allegations of retaliation, the Office of the Inspector General (OIG) will receive all allegations of misconduct, including those relating to fraud, workplace harassment, abuse of authority and sexual exploitation and abuse, irrespective of their source. Those making allegations of misconduct have the option to leave contact details or to remain anonymous. While anonymous complaints of misconduct can be made, they should contain enough detailed information to enable OIG to obtain independent corroboration of the facts. In the absence of sufficiently clear and specific allegations, OIG may not be able to proceed. (4.1, par.5)
- All IOM personnel have a duty to report in good faith any breach of IOM's rules and regulations. In addition, in Country Offices, the Chief of Mission or Head of Office or his or her delegated authority should contact OIG as soon as possible when he or she has received sufficient information about the possible misconduct by staff or other individuals whether in the form of specific allegations or facts or circumstances suggesting that misconduct has occurred. (5.2, par. 25)

15. IOM, IOM Data Protection Principles (IN/00138) (2009). Available at <https://intranetportal/Pages/ControlNo.aspx?controlNo=IN/00138>.

16. IOM, IOM Reporting and Investigation of Misconduct Framework (IN/275) (2019). Available at https://dmsportal/PublishedDocuments/Basic%20Documents/IN_275_Reporting%20and%20Investigation%20of%20Misconduct%20Framework.pdf#search=in%20275.

6. PRINCIPLES

In carrying out AAP, IOM's crisis-related operations, programmes and activities adhere to the prevailing principles of/on:

- **Do no harm:**

Taking all necessary measures to protect the principles of “do no harm”, including to prevent the unintended harms that may result from well-meaning activities in crisis contexts by incorporating conflict sensitivity into assessments.

- **Non-discrimination:**

Taking all necessary measures to promote and advance gender equality and diversity inclusion, including by helping to remove or overcome obstacles that may undermine their access to assistance, services and their ability to submit complaints, provide feedback or participate in relevant decision-making relevant for AAP.

- **Zero tolerance for sexual abuse and exploitation:**

Taking all necessary measures to enforce the Organization's zero tolerance for SEA within all its operating environments,¹⁷ and to ensure strict adherence to IOM Standards of Conduct.¹⁸

- **Principled humanitarian action:**

Respecting the humanitarian principles of humanity, impartiality, neutrality and independence in the delivery of its humanitarian response, and equally calling for all those engaged in humanitarian action to promote and fully respect these principles.

- **Protection:**

Aligning IOM's responses with IASC-endorsed standards and practices on the centrality of protection, such as the IASC Protection Policy. Recognizing IOM adopts a rights-based approach to its work, its humanitarian action – in line with those of humanitarian partners – provides assistance based on an assessment of needs (needs-based) that takes into account the diversity of vulnerabilities and threats faced by the persons affected.¹⁹

- **Data protection:**

Handling personal data in line with IOM's data protection principles,²⁰ including on consent, transfer, and confidentiality, for example, when handling and investigating complaints and feedback from CFMs.

17. IOM, IOM Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse.

18. IOM, IOM Standards of Conduct.

19. IOM, IOM Humanitarian Policy.

20. IOM, IOM Data Protection Principles. This provides institutional safeguards for handling personal data of IOM beneficiaries, as well as a framework for the collection, use, storage, disclosure and disposal of personal data. It should be applied systematically throughout the Organization.

7. OPERATIONAL COMMITMENTS AND OBJECTIVES

IOM's commitments to AAP centre on: (a) leadership; (b) information-sharing and transparency; (c) participation; (d) complaints and feedback mechanisms; and (e) partner coordination.

IOM's commitments are intrinsically linked and build on and reinforce each other. Together, the commitments affirm the rights of affected populations and affected communities to be informed and involved in the decision-making processes that affect them; and enable IOM to ensure that affected people are placed at the core of its programming.

For IOM to achieve its commitments, the Organization and all staff shall strengthen and embed its approach to AAP through the following objectives:

a) **Leadership: Strengthen leadership and systems to embed good practices within the organization's management structures and ensure compliance of IOM staff and implementing partners. Measures include the following:**

- Reinforce internal accountability systems, including the reporting of all forms of misconduct through the weareallin.iom.int platform²¹ ensuring clear lines of reporting and accountability relevant to all aspects of AAP are established and enforced.
- Institutionalize and integrate AAP throughout the full project cycle for crisis-related programming and in strategic planning processes at the country, regional and global levels.
- Mainstream AAP in relevant programmes, monitoring and evaluation, project development/management, partnership agreements, recruitment (including from the standby roster partnerships) and staff inductions, trainings and performance evaluations.
- Ensure continuous monitoring, evaluation, learning and improvement, and to the extent possible adjusting programmes in line with monitoring outcomes.
- Reinforce IOM Standards of Conduct, the Policy and Procedures for Preventing and Responding to Sexual Exploitation and Abuse and the IOM Data Protection Principles.

b) **Information-sharing and transparency: Protect and promote the right to information and two-way communication with affected people. Measures include the following:**

- Ensure affected populations and communities have access to relevant information about the IOM activities and processes that affect them in a reliable and timely manner, including being contextually relevant and in line with literacy levels and language diversity, and that they have the opportunity to provide feedback, as appropriate (that is, closing the feedback loop).
- Inform affected populations and communities about the relevant parts of IOM Standards of Conduct and their right to provide feedback or raise complaints and about their rights in relation to their personal data.

21. [Weareallin.iom.int](https://weareallin.iom.int) is a resource database and a reporting platform to receive complaints on all forms of misconduct, including those relating to sexual exploitation and abuse. Available at <https://weareallin.iom.int/>.



- Share basic information with partners, governments, donors and other stakeholders including the private sector about IOM's mandate and mission to promote transparency and maintain realistic expectations from stakeholders towards the Organization.

c) **Participation: Involve populations to influence and shape the design, implementation, monitoring and evaluation of activities and decision-making processes throughout the full project cycle. Measures include the following:**

- Identify and enable populations to participate using various methods to ensure that participation is inclusive and representative of diverse groups and in understanding diverse risks, vulnerabilities and capacities.
- Tailor and adopt participatory methods that are appropriate per context and activity, being conducted at all stages of the IOM programme cycle: planning, design, implementation, monitoring and evaluation in a systematic manner.
- Ensure special consideration is given to diverse groups, including the most vulnerable and marginalized groups, and to traditional and cultural dynamics so as not to perpetuate existing inequalities or bias. Diverse groups may be based on gender, age, health, sexual orientation, ethnicity, language, disabilities and other diversities and vulnerabilities.
- Identify barriers to equal participation and take relevant remedial measures to overcome the barriers, including for those who may fear retaliation and associated risks for participating or coming forward with a complaint, as well as groups who are marginalized.

d) **Complaints and feedback mechanism: Establish diverse and contextually appropriate mechanisms that enable communities to provide feedback on programmes and submit complaints, and that activate appropriate processes and procedures to provide a timely response. Measures include the following:**

- Establish clear referral pathways with designated tasks and responsibilities for complaints on programmes and with corresponding time frames for action within IOM teams. In inter-agency contexts, IOM's own referral pathways are in place or developed in accordance with collective accountability. Referral pathways for complaints of misconduct are established in the IOM Policy and Procedures on PSEA (IN/234) and in IOM Reporting and Investigation of Misconduct Framework (IN/275).
- Consult affected populations, including vulnerable and marginalized groups, in the design and set-up of the CFM in order to maximize its effectiveness and ensure that it is appropriate, safe and accessible.²²

22. IASC, 2016; IOM, Institutional Framework for Addressing Gender-Based Violence in Crises, IOM Staff Advisory (Geneva, 2018). Available at https://publications.iom.int/system/files/pdf/iom_gbvic_framework.pdf.

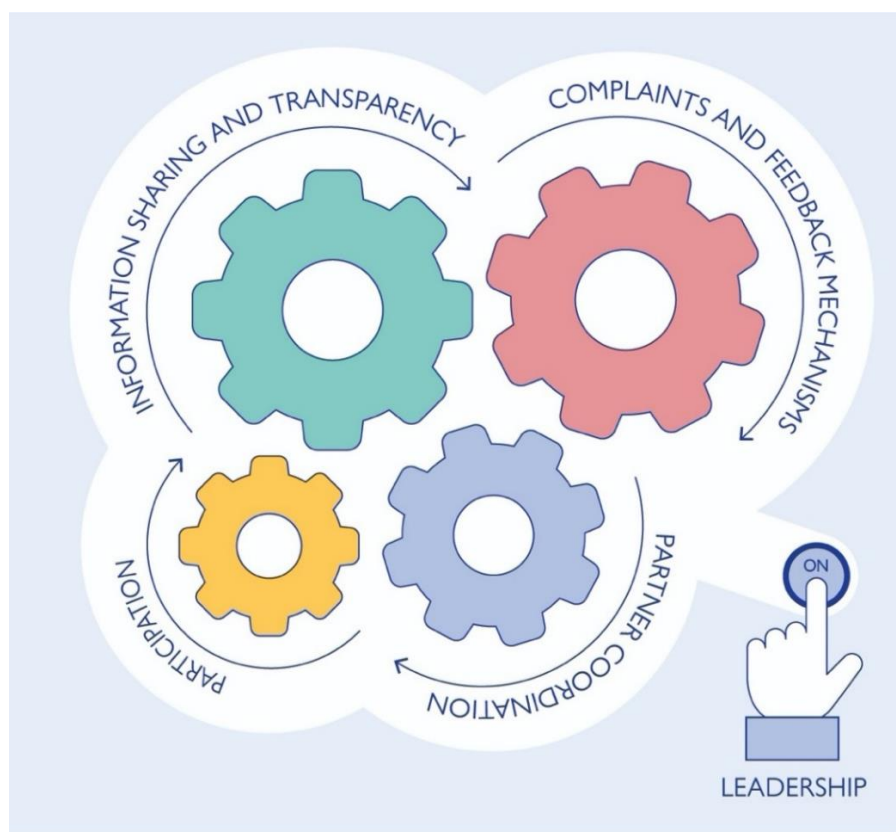
- Acknowledge complaints and relevant feedback (as appropriate) in a timely manner.
- Ensure protection of all personal data handled through CFMs, in terms of consent and confidentiality in line with data protection principles.²³

e) **Partner coordination:** Collaborate with peers and partners to deliver on AAP principles and commitments in a coordinated and coherent way, including collective responsibility in inter-agency contexts. Measures include the following:

- Promote incorporation of AAP in country-based strategic documents within HCTs.
- Explicit incorporation of AAP in cooperation agreements with implementing partners, as well as appropriate monitoring and evaluation on compliance. The implementation shall be coordinated with the Office of Legal Affairs (LEG).
- Promote AAP practices in the preparation of the HNO and the HRPs.
- Promote collective approaches to AAP, referral pathways, and the protection of personal data of affected populations when collaborating with implementing partners, cluster members and operational partners within HCTs.
- Promote awareness on reporting of all forms of misconduct through the weareallin.iom.int platform and referral pathways established in IN/234 and IN/275.
- Engage in dialogue with donors to strengthen coordination with partners and promote the necessary flexibility to be able to adjust programmes according to the feedback and views of affected populations and communities.

23. IOM, IOM Data Protection Principles.

Figure 1. Achieving accountability to affected populations



8. INSTITUTIONAL RESPONSIBILITIES FOR ACCOUNTABILITY TO AFFECTED POPULATIONS

Headquarters

Senior management, including Headquarters' Heads of Division involved with crisis-related programming are responsible for ensuring that AAP is integrated as appropriate in institutional-level policies and strategies and implemented through the headquarters and regional project endorsement structure.

IOM's Office of the Inspector General (OIG) contributes to the oversight of the Organization, through its functions of internal audit, evaluation and investigation. The Evaluation and Monitoring function of OIG provides monitoring and evaluation policy and guidance, including the integration of AAP in monitoring and evaluation related activities. OIG manages IOM central evaluations and gives guidance to the decentralized evaluations conducted across the Organization. Some components of AAP will be integrated into the scope of internal audits to ensure that internal auditors include questions on mechanisms in place to achieve AAP commitments as part of regular audit review at country level.

With the exception of allegations of retaliation, OIG is also the body that receives all allegations of misconduct, including those relating to sexual exploitation and abuse, irrespective of their source.²⁴ The Ethics and Conduct Office (ECO) receives all allegations of retaliation and processes these as provided for in the applicable organizational policies. ECO is responsible for providing counsel to the administration and staff about ethics and standards of conduct. ECO promotes ethical awareness and behaviour at IOM through training, communication, policy development and liaison.

- **Reporting:** IOM reports on AAP to the IOM Council in its Annual Report.²⁵ The report is informed by Organization-wide inputs to the Strategic Results Framework Institutional Questionnaire. In addition, OIG's monitoring and evaluation incorporates AAP in its reporting templates and tools and ensures the inclusion of community perception in project reports. At the global level, IOM subscribed to a voluntary self-reporting mechanism in order to measure collective progress against the agreed Grand Bargain commitments, including on AAP and principled approach to humanitarian response. IOM shall also work jointly with some IASC members on concrete deliverables agreed and reported to the IASC Results Group 2 on Accountability and Inclusion.

24. IOM, Reporting and Investigation of Misconduct Framework.

25. The Annual Report is an integrated narrative on activities and information on the result of IOM's work and is conveyed by the IOM Director General to Member States.

Regional and country level

Regional Directors are responsible for ensuring that AAP is integrated in regional strategies as relevant and applicable. Regional Thematic Specialists will ensure that country offices integrate and mainstream the AAP principles and commitments in crisis-related activities.

IOM Chiefs of Mission are responsible for AAP to be integrated into crisis response country strategies and have oversight to mainstream it across applicable programmes. Programme Managers are responsible for mainstreaming AAP across applicable programmes, and for ensuring AAP activities and mechanisms are in place and functional. Country offices play a key role in participating in HCTs and other coordination mechanisms so that IOM practices are in line with the standards required for collective accountability.

- **Reporting:** Country missions undertaking crisis-related programming report AAP-related information in the Strategic Results Framework Institutional Questionnaire. These missions are also to demonstrate in their country strategic plans how affected populations are engaged in the design, implementation, monitoring and evaluation of programmes and complaints and feedback mechanisms.

As member of the HCT, IOM shall incorporate AAP into its needs assessment templates, cluster plans and country-based strategic documents. The HCTs prepare the HRP, which contains a dedicated section on monitoring and AAP. It describes the overall collective accountability approach, indicates how affected communities will be engaged throughout the response and how the HCT will adjust overall programming based on this engagement and response monitoring.

Donors that endorsed the Grand Bargain's commitments including the United Nations Central Emergency Response Fund (CERF) require recipient organizations to report on AAP in their reporting templates, as in the case of CERF-funded projects under the cross-cutting section. IOM project reports shall indicate how AAP is mainstreamed in activities and describe how AAP has been/will be ensured during the different phases of the project.