Second informal consultation on the updated Protection Policy

Outline of the proposed update of the Protection Policy



3 February 2020

World Food Programme Rome, Italy The WFP Policy and Programme Division is pleased to share with the membership of the Executive Board two interrelated papers for discussion.

First, as requested by the Board membership at the 16 July 2019 informal consultation, the Policy and Programme Division has developed an outline of a proposed update of the WFP Humanitarian Protection Policy (2012). The outline includes a theory of change for the policy update, the scope of the update, cross-cutting issues, an analysis of the drivers of exclusion, and key enablers of implementation of the updated policy, with an accountability framework.

Second is an accompanying road map to disability inclusion to ensure that the needs of persons with disabilities are taken into account in the design of WFP programmes. The road map is being prepared pursuant to discussions with the Board membership, in which it was agreed that in updating the protection policy management would look at the implications of disability inclusion for WFP programming and operations, and the United Nations Disability Inclusion Strategy. The road map presents management's initial thinking on and approach to disability inclusion both in the context of and beyond programming.

Purpose and rationale

- 1. This paper presents an outline of issues to be covered by a proposed update of the WFP Humanitarian Protection Policy, which will be submitted for approval to the Executive Board at its 2020 second regular session. The update responds to recommendations deriving from the 2018 evaluation of the WFP Humanitarian Protection Policy² and management's response to those recommendations.³ Strengthening the protection policy will demonstrate WFP's recognition of the contribution that it must make to meaningful responses to protection issues. Given its size, scope of activities across the humanitarian–development spectrum and reach, WFP's roles and responsibilities will vary from one context to another. They will include a range of actions from direct operational engagement to forging strategic and operational partnerships for advocacy and will be based on an understanding that only the combined action of several actors results in a successful protection response.
- 2. WFP took immediate steps to implement the recommendations from the evaluation. A three-year protection strategy⁴ was developed focusing on improved data collection and analysis, partnerships and stakeholder engagement and strengthened integration in risk management, supported by sufficient human resources, strong leadership and a clear policy framework.⁵

https://docs.wfp.org/api/documents/WFP-0000111132/download/.

¹ Available at: https://www.un.org/en/content/disabilitystrategy/assets/documentation/UN_Disability_Inclusion_Strategy_english.pdf.

² In line with WFP's Evaluation Policy, the Humanitarian Protection Policy was evaluated after five years of implementation. See Evaluation Policy 2016–2021 (WFP/EB/2015/4-A/Rev.1, available at https://docs.wfp.org/api/documents/WFP-0000024368/download/. The summary evaluation report (WFP/EB.A/2018/7-B) is available at https://docs.wfp.org/api/documents/WFP-0000070461/download/.

³ WFP/EB.A/2018/7-B/Add.1. https://docs.wfp.org/api/documents/WFP-0000070462/download/

⁴ WFP 2019–2021 Strategy for Protection and Accountability to Affected People.

⁵ Recommendations 2, 3, 4, 5 and 6.

SUMMARY OF RECOMMENDATIONS FROM THE 2018 EVALUATION

Recommendation 1: A new policy.

Recommendation 1 calls on WFP to reaffirm that protection of and accountability to affected populations are among its core responsibilities in policy and practice in playing its role in food security and partnerships (SDGs 2 and 17).

Recommendation 2: Integration into risk management.

Recommendation 2 calls for links between risks and programming for protection to be clarified and should be the subject of training for senior staff to build their skills in protection-related risk analysis.

Recommendation 3: Partnerships.

Recommendation 3 calls for the Partnerships and Governance Department and the Policy and Programme Division to develop a formal approach to resource mobilization to support the achievement of cross-cutting protection results.

Recommendation 4: Leadership and human resources.

Recommendation 4 provides that by mid-2019 the Policy and Programme Division and the Human Resources Division should increase and formalize protection staffing and put in place skills training for targeted staff members. Among other actions, this will require the integration of protection into leadership and induction training and individual performance assessments.

Recommendation 5: Evidence base.

According to recommendation 5, WFP should strengthen its analysis of contexts and protection issues by reinforcing its data systems for monitoring and evaluation and building on existing information management systems to capture protection-related information. This work will include the elaboration of a "big data" pool of information on protection that combines the qualitative and quantitative information gathered; the revision of corporate protection indicators; and the inclusion of protection analysis in evaluation.

Recommendation 6: Stakeholder dialogue.

Recommendation 6 calls on the Policy and Programme Division to develop a new strategy for engagement with affected populations and vulnerable groups based on strengthened community feedback mechanisms.

3. To design the next stages in its response to the recommendations, WFP engaged with affected populations in a range of settings, practitioners in the field and a wide range of other stakeholders. The consultations took into account international norms in the humanitarian sector, such as the Centrality of Protection in Humanitarian Action statement of the Inter-Agency Standing Committee (IASC) Principals, which includes the following text.⁶

Protection of all persons affected and at risk must inform humanitarian decision-making and response, including engagement with States and non-States parties to ... conflict. It must be central to our preparedness efforts, as part of immediate and life-saving activities, and throughout the duration of the humanitarian response and beyond.

4. Similarly, in the development arena, WFP has committed to the 2030 Agenda for Sustainable Development, which is grounded in the principle of "leaving no one behind". This shift from the centrality of assistance in the 2012 protection policy to the centrality of protection in the update – in other words, from a focus on how WFP provides assistance to a focus on how

⁶ https://interagencystandingcommittee.org/system/files/the_centrality_of_protection_in_humanitarian_action_english_.pdf.

WFP's assistance is received and perceived – will enable WFP to deliver on the WFP Strategic Plan (2017–2021),⁷ which has the aim of first reaching the people who are furthest behind as a result of growing inequalities of income, wealth and access to basic needs, such as food, shelter and clothing, but also sanitation, education, healthcare, justice and human rights. These inequalities are constraining the achievement of real, visible and long-lasting development.

5. WFP is ensuring that affected populations are central to all strategic decisions and delivery related to its food security mandate, whether in humanitarian, development or protracted crisis settings. WFP operates in various participatory decision making spheres that govern WFP's actions, including strategy, operations and the field. The updated protection policy will detail how the voices of affected people will be heard and taken into account in these spheres.

Definitions

6. One of the conclusions of the 2018 evaluation was that there was a need to clarify and define protection and its principles in the context of WFP's operations. In the light of that conclusion management proposes the following terms and definitions, which are in line with the IASC definition of protection (provided in the box below), as the basis for the proposed policy update.⁸

Protection: Protection concerns should be understood to arise when people are at risk because of who they are and where they are. Based on that understanding, the greatest protection risk facing affected populations is discrimination or exclusion. WFP will use its food security mandate to help to reduce the exclusion and discrimination of affected populations. WFP will not change what it does, but rather how it does it.

IASC definition of protection: "... all activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and the spirit of the relevant bodies of law (i.e. International Human Rights Law (IHRL), International Humanitarian Law, International Refugee law (IRL)."

Safety: The physical safety of beneficiaries, including their psychosocial safety, requires that service delivery and distribution channels be designed to take the need for safety into account.

Dignity: WFP staff, from field monitors to country representatives, must fully understand the needs of the people that WFP serves and the need to deliver assistance with respect. This means that affected people have the right to receive assistance that will empower them and pave their way to new opportunities, as opposed to reliance on external support or the adoption of degrading survival mechanisms. The sense of identity and culture of affected populations should not be disregarded.

⁸ IASC. 2016. Policy: Protection in humanitarian action. https://interagencystandingcommittee.org/system/files/iasc_policy_on_protection_in_humanitarian_action.pdf.

⁷ https://docs.wfp.org/api/documents/WFP-0000019573/download.

Integrity: WFP is committed to working with affected populations to ensure that all of its actions and efforts are – to the degree possible – designed to be holistic and implemented responsibly in ways that reduce protection risks and foster trust and reciprocity with the people it serves. People should be treated in ways that preserve and enhance their mental and physical well-being.

Physical security: This includes freedom of movement, mitigation of sexual and gender-based violence, access to recourse, and avoidance of further exclusion or marginalization.

Material security: This includes adequate standard of living and access to economic opportunities.

Legal security: This includes access to documentation; effective mechanisms for restoring housing, land and property; and the right to participate in public life.

Scope and considerations

7. The policy will apply whether WFP is operating in a development or emergency humanitarian settings, or – as is increasingly the case – a protracted crisis. It will adhere to the four global principles of protection mainstreaming,⁹ with strong engagement of affected populations and an emphasis on their empowerment through enhanced mechanisms for accountability to affected populations.

Policy coherence and cross-cutting issues

- 8. Policy coherence is key to ensuring the success of this and all other WFP policies. Relevant WFP policies will therefore be reviewed, and those that are being revised (such as in humanitarian access) or being developed in new areas of work (such as education, food systems and social protection), will incorporate the protection of people of concern as a core principle and outcome. The protection policy reflects an area of integrated work in that it is intended to link issues in all areas of programming and operations, from supply chain and planning to service delivery and measurement.
- 9. WFP considers climate change, gender-based violence and data protection to be cross-cutting issues. They must therefore be considered in the proposed protection approach as follows.

Climate change

10. In addition to the protracted nature of today's conflicts, climate change is another risk multiplier, amplifying and compounding inequalities and vulnerabilities. As such it will constitute a core issue in context analysis in respect of groups that face particular risks. 11

⁹ https://www.globalprotectioncluster.org/themes/protection-mainstreaming/.

[&]quot;1. Prioritize safety and dignity, and avoid causing harm: Prevent and minimize as much as possible any unintended negative effects of your intervention which can increase people's vulnerability to both physical and psychosocial risks. 2. Meaningful access: Arrange for people's access to assistance and services – in proportion to need and without any barriers (e.g. discrimination). Pay special attention to individuals and groups who may be particularly vulnerable or have difficulty accessing assistance and services. 3. Accountability: Set-up appropriate mechanisms through which affected populations can measure the adequacy of interventions, and address concerns and complaints. 4. Participation and empowerment: Support the development of self protection capacities and assist people to claim their rights, including – not exclusively – the rights to shelter, food, water and sanitation, health, and education."

¹⁰ WFP. 2017. WFP's Climate Change Policy. https://docs.wfp.org/api/documents/WFP-0000023971/download/?_ga=2.176231845.1091759073.1579194258-163325202.1541357826.

¹¹ See, for example, the impacts of climate change on indigenous populations in the Plurinational State of Bolivia, Colombia and the Democratic Republic of the Congo. https://insight.wfp.org/indigenous-peoples-on-the-road-to-zero-hunger-123584415fcc.

Gender-based violence

11. The prevalence of gender-based violence is startlingly high. The prevention of gender-based violence, starting with the identification of its drivers, should therefore be included in all WFP interventions.

Data protection

- 12. Digital transformation is one of WFP's five critical corporate initiatives and WFP has introduced digital solutions throughout its programme cycle. This has generated significant advances in the way the organization interacts with the people it serves. At the same time, however, digital solutions give rise to new challenges associated with the collection, storage and sharing of personal data. In settings where technological infrastructure, capacity and access are limited, data protection principles must also be reflected in WFP interventions.
- 13. To address these new and evolving digital challenges, in the past year WFP has adopted a whole-of-organization approach, reflecting an understanding that data protection must be considered in all aspects of corporate identity. WFP has established an internal responsible data task force comprising representatives of all the functional divisions. The task force is mandated to develop a corporate approach for each of the categories of individual about whom WFP has digital information beneficiaries, staff, partners and vendors.
- 14. WFP acknowledges that data protection is a corporate responsibility that cuts across all core functions of the organization. A corporate data protection officer will therefore lead the development of the standards and policies required to ensure digital privacy throughout the design, monitoring and evaluation of interventions. Early achievements in digital privacy in the context of programmes, which have been informed by broad internal consultation, including with the Board membership, 12 are as follows:
 - > a beneficiary identity management guide;
 - a data protection toolkit;
 - > a tool for assessing the impact on privacy of WFP's digital solutions; and
 - a complaint and feedback mechanisms (CFM) standardization project.

Access and conflict sensitivity

- 15. As WFP operates in increasingly volatile, complex and insecure environments, its ability to establish and maintain principled and safe access is challenged. In these settings, protection risks are increasingly among the most salient access constraints. When affected people lack access to assistance, WFP will take all possible measures to ensure that it does not reinforce barriers and to facilitate access.
- 16. Consequently, WFP's planning of access-sensitive operations and negotiation of access with official and *de facto* authorities require recognition of and commitment to the centrality of protection. All operational modalities designed to facilitate access must be examined from the perspective of protection, the do no harm principle and conflict sensitivity. In negotiations, protection considerations, along with humanitarian principles, are the primary criteria to be considered in evaluating options and persuading interlocuters.

¹² On 4 November 2019, during its annual partnership consultation, WFP held a dedicated session with the chief executive officers of its main non-governmental organization partners; the Luxembourg delegation hosted a breakfast session on data responsibility in humanitarian action during the Board's second annual session; and extensive discussions were held with organizations such as the Office of the United Nations High Commissioner for Refugees, the United Nations Children's Fund and the International Committee of the Red Cross to learn how they have prepared themselves to benefit from the "fourth industrial revolution".

17. With these considerations in mind, it is essential that comprehensive context analysis be informed by the protection "landscape", including through engagement with the people that WFP aims to serve, in addition to their communities, local leaders and other authorities. In such engagement, special attention must be directed to ensuring the meaningful inclusion of vulnerable groups suffering from exclusionary practices. Experience has shown that building the trust of the people that WFP serves, combined with principled action, is essential to winning the acceptance of leaders and communities on which sustainable and safe access is based.

Nexus

- 18. The growing emphasis on work at the triple humanitarian–development–peace nexus provides an opportunity to reframe protection and make it central in the ongoing discourse on the nexus and what it means. In addition, inclusive and conflict-sensitive context analysis is likely to result in interventions with longer term impact. Incorporating protection into context analysis enables WFP to understand why cyclical coping strategies are no longer effective in meeting essential needs.
- 19. Without investments in resilience and development the returns on humanitarian assistance will be marginal. For example, a clear entry point for WFP's work at the nexus is through contributions to durable solutions¹³ for internally displaced persons. These solutions can only be successful if protection is at the core of their design. This approach is in line with a draft resolution being considered by the General Assembly, which calls for "the provision of protection and assistance, including by respecting and protecting the human rights and fundamental freedoms of all internally displaced persons, with a view to finding durable solutions". The draft resolution also states that internally displaced persons should be "approached from a humanitarian and development perspective, involving the timely engagement of internally displaced persons and host communities".¹⁴

Theory of change

- 20. To frame the protection policy update a theory of change has been developed through a bottom-up consultative process involving affected populations, WFP country offices, partners and governments:
 - i) If WFP, including management all levels, demonstrates strong commitment; and
 - ii) **If**:

11.

- WFP ensures that information and analysis are grounded in and driven by the perspectives of affected people and communities;
- WFP strengthens its methods and processes for the collection, management, storage and sharing of information gathered through these efforts;
- WFP mobilizes various sectors, clusters and actors to support strengthened analyses; and

¹³ As noted in the report of the Secretary-General on the outcome of the World Humanitarian Summit, which contains, *inter alia*, recommendations on strengthening partnerships among Member States and humanitarian and development actors to address the urgent and long-term needs of internally displaced persons.

¹⁴This same text also appears in previous resolutions adopted by the General Assembly on the subject of internally displaced persons. See e.g. resolution 72/182 of 19 December 2017.

WFP makes use of disaggregated data collected directly or through its partners
as well as qualitative information—meaning that quantitative food security
surveys emanating from WFP's Research, Assessment and Monitoring Division
(RAM) will need to be complemented with qualitative methods of inquiry to
contextualize protection risks.

Then, WFP will have the necessary evidence to:

- i) identify the people and groups that are excluded or at risk of being excluded;
- ii) understand the drivers of discrimination and exclusion, which may be numerous; and
- iii) select from a menu of appropriate response options.
- 21. Robust context analysis that is regularly updated will enable protection- and people-centred responses to evolve as situations change. As a result, through its programmes, WFP will contribute to reducing, and where possible preventing, people's vulnerability to food insecurity, inequality and exclusion. This approach will also allow WFP to integrate mechanisms that ensure the long-term sustainability of its programming. Such analysis will also determine when WFP's role should be advocacy rather than direct operational engagement i.e. when WFP should and can leverage its size and scope to support and partner with other actors that have other specializations in order to ensure a coordinated and complementary approach.
- 22. Proper context analysis, which builds on resources made available through the United Nations sustainable development cooperation frameworks, is a prerequisite to understanding other risks in the wider framework of the Sustainable Development Goals (SDGs) that reach beyond programming. These include institutional risks consisting such as security issues and the risk of financial or reputational loss, any of which can compromise people's ability to obtain WFP assistance. This is an additional reason for investing heavily in research, including through engagement with affected populations in ways and languages that are understood. Such efforts will facilitate acceptance of WFP's presence and sustained and unhindered humanitarian access, enabling affected populations to obtain WFP services and providing a level of protection for WFP staff and assets.
- 23. Context analysis will support better programme design and implementation that facilitates access to services in safety and with dignity and integrity. It will enable WFP to understand the contexts in which it operates, particularly the drivers of situations that cause or threaten to cause harm to affected people.
- 24. Implementation of the policy update will require a phased approach and the progressive application of minimum coverage norms, with intermediary milestones for measuring progress. This will build on the "concentric circles" approach of the 2012 protection policy, and implementation of the different phases will culminate in interventions that lead to reductions of the multi-dimensional inequalities that permeate every area of life. Each WFP country team must have a plan of sequenced actions and pathways for progressively reducing inequality and increasing opportunity for the most vulnerable people and communities.

- 25. Following this approach does not mean that WFP will be the only actor to address all of the relevant concerns, but rather that WFP will examine the concerns while planning and adjusting its programming according to its mandate. The resulting analysis will inform decisions on transfer modalities (cash-based or in-kind transfers or technical support) and the choice of activities that feature in the Integrated Road Map.¹⁵
- 26. The policy will also inform decisions regarding WFP's supply chain and emergency telecommunications support for other agencies. Many countries present unique challenges to access to basic social services such as electricity or telecommunications because of the high per capita cost of those services. In other instances, access to markets is hindered by poor infrastructure and fragmented value chains. These challenges perpetuate inequality and inhibit the diffusion of any development dividend. WFP can follow a multi-sector and multi-actor approach to strengthen access to social services in line with SDGs 2 and 17. This approach will also provide WFP with the requisite understanding of business risks by facilitating a form of due diligence in supply chain management. WFP has shown through its interventions that strengthening the purchasing power and effective demand of vulnerable people results in an expansion of the retail sector to provide essential goods and services. Such strengthening of demand also leads to improved coverage of supply and value chains within a given country and facilitates market integration to the benefit of consumers.

Analysis of the drivers of exclusion

- 27. While WFP applies protection principles in all of its programmes and contacts with people of concern, special attention is needed for the people who are most at risk, taking into account that there may be many layers of disadvantage and discrimination that exacerbate exclusion. Evidence-based decisions require data that is disaggregated by sex, age, ethnicity, barriers to inclusion and other factors. Understanding such "intersectionality" is central to WFP's strengthened approach to protection and to ensuring that WFP's programmes are delivered in safety while respecting the dignity and integrity of participants. Free and informed consent of the communities WFP serves is vital. 17
- 28. Based on consultations and needs assessments, the people whom WFP currently identifies as being most at risk, in the greatest need of protection and "left furthest behind" are mainly indigenous peoples, persons with disabilities, internally displaced persons and refugees. From a protection perspective, WFP will complement the interventions and advocacy of the Office of the United Nations High Commissioner for Refugees. In addition, WFP must also identify how it can best support the people in these three (or four) population categories through its assistance in ways that contribute to their inclusion in WFP programmes and in areas of social and economic life from which they are currently excluded. Geography,

¹⁶ "Single axis" models of discrimination, which only examine sex or a form of disability alone, fail to address the lived experiences of those who experience discrimination as a result of several factors. For example, an internally displaced indigenous woman with a disability may not receive the right assistance if her sex and disability are the only barriers considered when designing, delivering and monitoring an activity. See, for example, Smith, B. 2016. Intersectional Discrimination and Substantive Equality: A Comparative and Theoretical Perspective. *Equal Rights Review*, 16: 73–102. https://www.equalrightstrust.org/ertdocumentbank/Intersectional%20Discrimination%20and%20Substantive%20Equality%20A%20Comparative%20and%20Theorectical%20Perspective.pdf.

¹⁵ https://docs.wfp.org/api/documents/WFP-0000037739/download/.

¹⁷ See United Nations. 2006. Convention on the Rights of Persons with Disabilities. https://www.un.org/disabilities/documents/convention/convention_accessible_pdf.pdf; and United Nations Human Rights Council. 2018. "Free, prior and informed consent: a human-rights based approach. Study of the Expert Mechanism on the Rights of Indigenous People. A/HRC/39/62, noting links to the SDGs. https://documents-dds-ny.un.org/doc/UNDOC/GEN/G18/245/94/PDF/G1824594.pdf?OpenElement.

- socio-economic status, coping mechanisms, power structures and conflict dynamics¹⁸ are core to understanding who suffers from exclusion in WFP's areas of operation.¹⁹
- 29. For example, persons with disabilities constitute a significant percentage of the people who are disproportionately affected by conflict and humanitarian crises. 20 Implementation of the Convention on the Rights of Persons with Disabilities has resulted in the development of normative guidance by IASC,²¹ as well as development frameworks for achievement of the SDGs. Indigenous peoples²² are also among the most marginalized groups in the world and face many forms of discrimination. These include the dispossession of their lands and resources and forced displacement, which often result in their overrepresentation among the poor. Such high risks of exclusion are often a result of systemic and historical discrimination based on indigenous peoples' cultural and social distinctiveness. Indigenous peoples have rights to or manage at least 28.1 percent of the world's land area; the control and use of these lands and resources by others such as militias, armed groups, governments and private interests are at the core of many conflicts, leading indigenous peoples to be disproportionately affected by conflict. The rights of indigenous peoples are embedded in international instruments and mechanisms, most notably the Indigenous and Tribal Peoples Convention, 1989,23
- 30. It is estimated that 38.2 million people around the world are internally displaced. They face multiple challenges, particularly food insecurity. Humanitarian and development indicators generally lag behind in internally displaced populations. For example, displaced populations have higher rates of malnutrition, face more acute food crises, are prone to illness more frequently and have lower levels of schooling than their local community counterparts. WFP can work towards lowering the barriers faced by internally displaced persons when

https://info.undp.org/sites/bpps/SES_Toolkit/SitePages/Standard%206.aspx.

A footnote to this passage lists "tribal people", "first peoples", "scheduled tribes", "pastoralist" and "hill people" as some of the terms used to refer to indigenous peoples. Another notes that the "more commonly accepted definitions of indigenous peoples" include those listed in the Indigenous and Tribal People's Convention (ILO Convention No. 169), the Study of the Problem of Discrimination against Indigenous Populations (the "Martínez Cobo Study" (https://www.un.org/development/desa/indigenouspeoples/publications/2014/09/martinez-cobo-study/#more-7242)) and the Working Paper on the Concept of "Indigenous People" prepared by the Working Group on Indigenous Populations.

¹⁸ See United Nations Security Council Resolution 2417 of 24 May 2018.

¹⁹ Secretary-General's remarks to the Human Rights Council, 25 February 2019. https://www.un.org/sg/en/content/sg/speeches/2019-02-25/remarks-the-human-rights-council.

²⁰ This was the impetus behind article 11 of the Convention on the Rights of Persons with Disabilities (situations of risk and humanitarian emergencies). See also United Nations Security Council Resolution 2475 (2019) on the situation of persons with disabilities in armed conflict, emphasizing the need for disaggregated data and consultation. https://digitallibrary.un.org/record/3810148?ln=en.

²¹ WFP provided extensive comments on the IASC's Guidelines: Inclusion of Persons with Disabilities in Humanitarian Action, which were launched on 12 November 2019. https://interagencystandingcommittee.org/iasc-task-team-inclusion-persons-disabilities-humanitarian-action/documents/iasc-guidelines.

²² Considering the diversity of indigenous peoples, an official definition of "indigenous" has not been adopted by any United Nations entity. Standard 6 of the United Nations Development Programme social and environmental standards, entitled "Indigenous Peoples", states as follows:

[&]quot;There is no one universally accepted definition of indigenous peoples. For purposes of this Standard, "indigenous peoples" refers to distinct collectives, regardless of the local, national and regional terms applied to them, who satisfy any of the more commonly accepted definitions of indigenous peoples. These definitions include, among other factors, consideration of whether the collective: has pursued its own concept and way of human development in a given socio-economic, political and historical context; has tried to maintain its distinct group identity, languages, traditional beliefs, customs, laws and institutions, worldviews and ways of life; has exercised control and management of the lands, natural resources, and territories that it has historically used and occupied, with which it has a special connection, and upon which its physical and cultural survival as indigenous peoples typically depends; self-identifies as indigenous peoples; and whether its existence pre-dates those that colonized the lands within which it was originally found or of which it was then dispossessed. When considering the factors above, no single one shall be dispositive."

²³ https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:::NO:12100:P12100 INSTRUMENT ID:312314.

designing and implementing asset creation programmes. If properly designed, WFP resilience interventions can create incentives that enable both displaced populations and local communities to lay the groundwork for local economic development and the expansion of social protection systems to address the needs of the most vulnerable people – be they displaced or not.

Key enablers: roles, responsibilities and costing

- 31. To make this ambitious change in its way of working, WFP will continue to work in the four areas of acceleration identified in the Strategy for Protection and Accountability to Affected People (2019–2021). It will invest in operational research and partner with institutions that have recognized expertise in its areas of thematic focus, while continuing to build in-house capacity through awareness raising and learning tools for staff and leadership that are being reviewed and strengthened. It will also invest in promotional work and thought leadership at the global level by sharing best practices and challenges within inter-agency forums. In addition, risk management tools, data collection and reporting tools and the annual performance report will be updated to reflect protection as a priority.
- 32. Donor coordination and flexible funding tools will be critical to enabling the successful implementation of the proposed approach. It is projected that the financial requirement for continuing this work and starting implementation of the updated policy is USD 7.5 million over the course of 2020 and 2021.

Monitoring and compliance

- 33. Implementation of the updated policy will be monitored through a mutual accountability framework to be developed in the full policy document. For the updated policy to be effective, work on protection must be well-coordinated within WFP, throughout the international community at the country level, with host governments and between WFP and its Executive Board. Internally, WFP will work on its corporate results framework to ensure that it adequately measures results on the ground. The updated policy will also need to reinforce and, wherever possible, inform government-led food security plans and programmes. The mutual accountability framework will ensure that implementation of the updated policy is prioritized, funded, time-bound and monitored by all parties.
- 34. A core element of the mutual accountability framework will be donors' agreement to provide predictable resources over a set period for progressive achievement of the policy objectives.
- 35. Protection will be a standing agenda item at WFP senior management meetings, for which regional bureaux and selected country operations will be requested to provide written updates on implementation of the updated protection policy in their areas of operation.
- 36. Roles and responsibilities for oversight and monitoring are outlined in the following paragraphs.

Political level

- 37. WFP will provide a yearly update to the Executive Committee of the Secretary-General, to the General Assembly and through the update on the protection of civilians presented to the Security Council. This reporting will be key to the Executive Director's aspiration to "change lives", which cannot be realized unless protection is at the core of the humanitarian phase of WFP responses.
- 38. The Assistant Executive Director, Programme and Policy Development Department, will ensure policy coherence.

39. The Director of the Programme – Humanitarian and Development Division will provide an update on progress in implementation of the updated policy at each second regular session of the Board.

Operational level

- 40. Coherent working structures will reflect the substance of the updated policy at headquarters and in regional bureaux and will be aligned with and will complement initiatives under United Nations sustainable development and cooperation frameworks and of country offices. Implementation of the updated policy at the country level will be the responsibility of country directors and heads of programmes.
- 41. Protection will become a more prominent feature of WFP country strategic plans, and the officer or focal point responsible for protection will provide advice to the country representative or regional director to ensure that each CSP is consistent with the initiatives of the United Nations country team.
- 42. Informal peer reviews of progress in implementation of the updated policy will be requested by global inter-agency forums; a framework for these reviews will be developed.
- 43. The Director, Programme Humanitarian and Development Division will ensure that second-generation country strategic plans have clear protection objectives and costings.

Budgetary level

- 44. The necessary flexible resources will be made available from the core budget (direct support costs and the programme support and administrative budget) and extra-budgetary contributions.
- 45. As in any other policy area, non-compliance with the updated policy will have consequences:
 - WFP is committed to keeping the Board informed of any delays or challenges in implementing the progressive measures for implementing the updated policy.
 - A mid-term review will be conducted during the third year of implementation.
 - The integration of protection considerations into country strategic plans will have implications for activity budgets. Additional funding may be required.