WFP protection and accountability policy 2020

Third informal consultation

24 July 2020

World Food Programme
Rome, Italy

Purpose and rationale

1.   This protection and accountability policy for 2020 has been developed in response to a need recognized at headquarters and in line with the recommendations resulting from the 2018 evaluation[1] of the WFP humanitarian protection policy[2] and management's response to those recommendations,[3] which are referred to throughout this policy. Protection is understood as activity aiming to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities. Strengthening WFP's protection policy[4] signals its commitment to preventing whenever possible and to responding to protection risks to individuals, as well as to crafting successful protection outcomes for people of concern[5] in relation to WFP's food and nutrition security mandate. WFP through its operational footprint (WFP employees and its cooperating partners as well as financial services providers, contractors, vendors and governments) is often closest to affected populations and is accordingly well placed to support effective protection outcomes. This policy is consistent with United Nations systems and a one United Nations protection approach as called for by the Secretary-General. It is framed within the obligations of the United Nations multilateral system across the three foundational pillars of human rights; peace and security; and development.[6]

2.   WFP must ensure that affected populations are central to all strategic decisions and across all programmes and operations. The aim of WFP's work is primarily to reduce food and nutrition insecurity safely and to promote learning, flexibility and adaptability in WFP's responses.[7] WFP operates with a range of stakeholders whose participation in decision making processes is key. Paramount are the voices of affected people, which must influence WFP's actions. Consultations with affected populations reflect this approach to engagement, as do consultations with WFP practitioners in the field, headquarters employees, host government representatives, representative organizations, global protection forums and donors.[8] WFP must also seek to support and promote people's own capacities to address the risks to which they are exposed.[9]

3.   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 include a range of actions from direct operational food security engagement to forging operational partnerships and coalitions for advocacy or sharing responsibility with governments to uphold social and economic rights. Fundamental to this policy is the recognition that only the combined action of several actors, including through WFP's logistical enabling support

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[1] See annex I for a summary of the recommendations.

[2] In line with WFP's evaluation policy (WFP/EB.2/2015/4-A/Rev.1), the 2012 humanitarian protection policy was evaluated after five years of implementation. 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] Drafting an updated strengthened policy is the response to Recommendation 1 of the Evaluation.

[5] The terms of affected populations and person of concern are used inter-changeably for the purpose of this Policy.

[6] https://www.un.org/un70/en/content/videos/three-pillars/index.html last accessed on 2 April 2020.

[7] *See* https://protection.interaction.org/rbp-key-elements/, last accessed on 3 April 2020.

[8] This Policy was developed from a "field first" perspective with missions conducted chronologically in Bangladesh, El Salvador, South Sudan, Sri Lanka and the Central African Republic. WFP consulted non-governmental organizations, government entities, think tanks, integrated mission components when present, field practitioners from all levels. The Results Group 1 on the centrality of protection as well as the Global Protection Cluster and WFP corporately were consulted.

[9] *See* Professional Standards for Protection Work, Standards 1.8 and 1.9 (2018), accessed at https://reliefweb.int/sites/reliefweb.int/files/resources/0999_002_Protection_web.pdf, last accessed on 11 May 2020.

for others, results in successful protection outcomes. This policy equips WFP to determine and define protection risks and needs with the utmost specificity and accuracy.

4.   WFP took immediate steps to implement the recommendations of the 2018 evaluation. It developed a three-year protection strategy[10] focused on improved data collection and analysis, partnerships and stakeholder engagement and strengthened integration in risk management, supported by sufficient human and financial resources, strong leadership and a clear policy framework.[11] Building on that strategy, this policy's implementation will be supported by detailed guidance, indicators in data collection and analysis tools and select activities.

5.   WFP engaged with affected populations in various settings, practitioners in the field and a wide range of other stakeholders including host governments at the national and local levels to further design its response to the recommendations. The consultations were informed by humanitarian sector norms such as the Inter-Agency Standing Committee (IASC) statement on Centrality of Protection in the Humanitarian Action statement and subsequent policy, which includes the following text:[12]

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

6.   The 2012 WFP Humanitarian Protection Policy was grounded in this normative framework, which along with international humanitarian human rights and refugee law, informs this Policy. This Policy is also grounded in the 2030 Agenda for Sustainable Development of "leaving no one behind" and enables WFP to deliver on its Strategic Plan (2017-2021),[13] which aims at reaching the people who are furthest behind. Additionally, the Protection and Accountability Policy must be central to forthcoming corporate strategic direction.

7.   There is a deliberate shift from the centrality of assistance in the 2012 WFP Humanitarian Protection Policy to the centrality of protection in this revised Policy. In other words, WFP must focus not only on how it provides assistance, but also on how WFP decision making and related programming is strategically designed, received and perceived by affected populations – what impact it has on addressing protection risks. This means WFP must have the tools and resources in place to enhance the protection of affected populations.

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[10] WFP 2019–2021 Strategy for Protection and Accountability to Affected People.

https://docs.wfp.org/api/documents/WFP-0000111132/download/, last accessed on 2 April 2020.

[11] The strategy's areas of focus and acceleration are a first step towards responding to the evaluation's recommendations 2, 3, 4, 5 and 6.

[12] https://interagencystandingcommittee.org/system/files/the_centrality_of_protection_in_humanitarian_ action_english_.pdf; https://interagencystandingcommittee.org/protection-priority-global-protection-cluster/documents /iasc-policy-protection-humanitarian-action last accessed on 2 April 2020.

[13] https://docs.wfp.org/api/documents/WFP-0000019573/download, last accessed on 2 April 2020.

Definitions

8.   The 2018 evaluation concluded that the notion of protection needs to be simplified and demystified. It recommended that protection concepts be defined and clarified to enable WFP decision makers and practitioners to better design and operationalize programmes geared to necessary protection outcomes. In order for the policy to be effective, all employees with management responsibilities must apply the following definitions.

Accountability: Whether to affected populations, to donors or internally, WFP's management is accountable. Accountability implies a genuine commitment to meeting specific goals and targets, including through tracking, implementation and verification processes as well as non-compliance mechanisms.

Advocacy: Efforts to influence decisions and aim to bring about transformative change through collective focused engagement and clear and simple messaging, focused on results ideally delivered to all stakeholders, especially affected populations.

Affected populations: The women, men, girls and boys with varying needs, vulnerabilities and capacities who are in situations of vulnerability or are adversely affected by poverty, armed conflict, disasters or other crises negatively affecting their food and nutrition security or who face barriers to participation or access in food security interventions.

Capacities: Abilities and knowledge, including education, resources and networks, which need to be considered comprehensively taking into account vulnerability and opportunity.

Coping mechanism: An adaptive response to a threat, stress or insecurity related to food and nutrition. Some coping mechanisms may be harmful to individuals, families, households or the wider community and, as such, may pose protection risks.

Dignity:[14] The respect due to affected persons, including their inherent worth, identity and culture. WFP employees, from field monitors to country representatives, and partners must fully understand the diverse cultural and other needs of the people with whom WFP works and serves and the necessity of providing 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. It also means that sensitivity and responsiveness to the identity and culture of affected populations must be fully integrated in the manner in which food assistance is provided by WFP and received by affected people.

Inclusion: A needs and rights-based approach to programming, which must have the outcome of ensuring that people of concern have knowledge and agency on an equal basis, access to basic services and a voice in the development and implementation of those services.

Integrity:[15] Actions and efforts that are – to the degree possible – holistic and implemented responsibly in ways that reduce protection risks and foster trust and reciprocity with the affected populations served by WFP.

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[14]   In   line   with   the   preamble   of   the   International   Covenant   on   Civil   and   Political   Rights. https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx.

[15] In line with articles 6, 7 and 10 of the International Covenant on Civil and Political Rights. See general comment 36 at https://www.refworld.org/docid/5e5e75e04.html.

Mainstreaming protection: Enhancing the quality and maximizing the impact of all food security and nutrition activities to enhance protection. Mainstreaming is not a substitute for protection programming; it determines how WFP provides assistance. It means addressing protection concerns at all levels of programming. It must inform how WFP develops operational programmes in a clear strategic framework from the bottom up.

Obligation to do no harm:[16] Anyone working in fragile settings or with people in vulnerable situations has a duty not to put the people in those settings and situations at risk of any negative consequence or to increase their vulnerability to, among other things, retaliation from governments, clans, factions and even families, loss of income or stigma. In addition, it must be ensured that activities support social cohesion and trust and do not exacerbate or promote conflict or cause harm to the environment.

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 for WFP reflected in monitoring safety, integrity and dignity (i.e. international human rights law, international humanitarian law, international refugee law.[17] More specifically, protection is understood as aiming to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities.

Protection outcomes: Protection outcomes include alleviating human suffering,[18] reducing risks and threat levels and improving the safety and dignity of individuals. These will be measured by a reduction in risks[19] to the enjoyment of nutrition and food security.

Protection risk: The likelihood that harm that could befall an individual. The harm may negatively affect the physical or mental integrity[20] of a person or her or his material safety[21] or violate her or his rights, with or without barriers to legal recourse.[22]

Risk factors: Risk factors are threats, vulnerabilities and capacities[23] and will require an examination of underlying and root causes, circumstances, decisions and events that contribute in different ways to creating or exacerbating patterns of harm.

Safety: The physical security of persons, and their psychosocial safety, requiring that service delivery and distribution channels are designed so that the need for safety is effectively taken into account.

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[16] https://www.alnap.org/system/files/content/resource/files/main/donoharm_pe07_synthesis.pdf.

[17] This definition is based on the Inter-Agency Standing Committee 2016 policy on protection in humanitarian action. https://interagencystandingcommittee.org/system/files/iasc_policy_on_protection_in_humanitarian_action.pdf.

[18] In line with Article 2 of the International Covenant on Civil and Political Rights. https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx.

[19] *See* Professional Standards for Protection, ch. 2 (2018). https://reliefweb.int/sites/reliefweb.int/files/resources/0999_002_Protection_web.pdf.

[20] Harm to physical or mental integrity may result from, among other things, physical violence, restriction of freedom of movement, sexual or gender-based violence, prevention of access to recourse, exclusionary practices and the violation of free and informed consent.

[21] Harm to material safety may result from, among other things, destruction of property, all means used to prevent a person from enjoying an adequate standard of living and prevention of access to economic opportunities.

[22] Harm to legal safety may result from, among other things, prevention of access to documentation; barriers to effective mechanisms for restoring housing, land and property; and interference with the right to participate in public life.

[23] See chapter 2 of the professional standards. https://reliefweb.int/sites/reliefweb.int/files/resources/0999_002_Protection_web.pdf.

Threats: Actions, behaviours and policies entailing violence, coercion, discrimination or deliberate deprivation that cause harm (physical or psychological) or constitute a barrier to access to WFP support.

Vulnerability: The characteristics of a person or community in terms of their capacity to anticipate, prepare for, cope with, resist or recover from the impact of shocks or intersecting, structural or other inequalities. A person is not inherently vulnerable but the situation they are in may render them vulnerable. This means that WFP must analyse factors contributing to heightened risk and related needs, including barriers to access to assistance and intersecting structural inequalities. In this regard, vulnerability must not be viewed in a generalized way because that is too broad to be practical when seeking to reduce risk. Similarly, people cannot be seen as one homogenous group. Group needs should not obscure the likelihood of intra-group vulnerabilities.

Scope and considerations

9.   This policy must apply whether WFP is engaged in development activities or situations of humanitarian concern including, increasingly, protracted crisis settings. It must adhere to the four global principles of protection mainstreaming,[24] with strong inclusive engagement of affected populations and an emphasis on their empowerment through enhanced approaches, processes and mechanisms for accountability to them.

10.   The four protection mainstreaming principles follow:

   ➢ **Prioritize safety and dignity and avoid causing harm:** Prevent and minimize as much as possible any unintended negative effects of an intervention that can increase people's vulnerability to both physical and psychosocial risks.
   ➢ **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.
   ➢ **Accountability:** Set up appropriate approaches, processes and mechanisms through which affected populations can measure the adequacy of interventions, influence decision making and make informed decisions.
   ➢ **Participation and empowerment:** Support the development of self-protection capacities and assist people to claim their rights, including – not exclusively – the rights to information, shelter, food, water and sanitation, health and education.

The theory of change

11.   This Policy is grounded in an explicit and detailed theory of change developed through a bottom-up consultative process involving the active participation of affected populations, partners, representative organizations, WFP country offices and headquarters partners, host governments and private or donor governments.

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[24] https://www.globalprotectioncluster.org/themes/protection-mainstreaming/

12.   The theory of change is expressed through the following if/then proposition.

If:

- WFP knows and understands[25] what protection means for WFP and for affected populations within a given context, meaning that if WFP ensures that information and analysis are grounded in and informed by the diverse perspectives of affected people and communities at the localized level; mobilizes various sectors, clusters and actors to support strengthened timely and relevant analyses; and strengthens its methods and processes for the collection, management, storage and sharing of information gathered through these efforts;[26]

- WFP applies protection understanding in its programmes and operations, through employee as well as cooperating partner capacity building and through protection requirements in its field-level agreements with cooperating partners;

- WFP is accountable, meaning that management of all employees at all levels[27] demonstrates strong commitment and leadership in implementing identified protection outcomes;

- WFP applies the highest standard of due diligence,[28] including through the identification, assessment, mitigation and monitoring of sources of risk in how it conducts operations and in its relationships.

Then,

WFP will have the necessary evidence to implement good programming and must ensure that it:

- identifies the people and groups that are most at risk;

- understands the drivers of exposure to risk, which may be numerous;

- cultivates relationships and collaborates with actors to achieve the desired outcome of reduced risk;

- is able to flexibly and safely adapt its interventions based on an ongoing analysis, management and monitoring of risk;

- selects from a menu of appropriate response (activities) options and consults and informs affected populations;

- decides on its activities in line with international human rights norms and international humanitarian and refugee law and the WFP code of conduct; and

- ensures that the strengthening of protection will positively contribute to Sustainable Development Goals 2 and 17 sustainably and effectively.

13.   The outlined theory of change demands an in-depth understanding of local context, which affects the identification of an appropriate strategic approach to serve as a basis for programming, planning and decision making on matters ranging from supply chains to the choice of food security activities. This understanding will necessarily be built on key assumptions about the characteristics of a response. The theory of change is presented graphically in the figure below.

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[25] Improve data systems for monitoring and evaluation and building on existing information management systems to capture protection-related information responds to recommendation 5 of the evaluation.

[26] Strengthening context analysis responds to recommendation 5 of the evaluation.

[27] Ensuring that staff are skilled at all levels to implement protection responds to recommendation 4 of the evaluation.

[28] Integration of protection into risk and enterprise management responds to recommendation 2 of the evaluation.
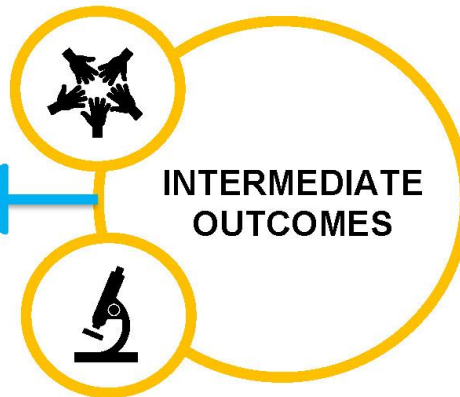
THEORY OF CHANGE
Protection in practice

IF WFP…

1. Knows and understands what protection means to affected populations within any given context;
2. Applies protection understanding in its operations, through employee as well as cooperating partner capacity building and through protection requirements in its field-level agreements with cooperating partners;

3. Is accountable, meaning management of all employees at all levels demonstrates strong commitment and leadership to implement identified protection outcomes;
4. Applies the highest standards of due diligence, including through the identification, assessment, mitigation and monitoring of sources of risk in how it conducts operations and in its relationships;

OUR IMPACT

WE ACHIEVE PROTECTION OUTCOMES

INTERMEDIATE OUTCOMES

THEN, WFP…

will have the necessary evidence to implement good programming and must ensure that it:

5. Selects from a menu of appropriate response (activities) options and consults and informs affected populations;
6. Decides on its activities in line with international human rights norms and international humanitarian and refugee law and the WFP Code of Conduct;
7. Ensures the strengthening of protection will positively contribute to SDGs 2 and 17 sustainably and effectively.

8. Identifies the people and groups that are most at risk;
9. Understands the drivers of the exposure to risk, which may be numerous;
10. Is able to flexibly and safely adapt its interventions based on an ongoing analysis, management and monitoring of risk;

Context analysis

14. The theory of change places heavy emphasis on analysing the unique characteristics of each context, which by their nature may be liable to rapid change. There is no one-size-fits-all checklist. It is critical to understand the character of a threat, its source and the main actors, behaviour, policy or practice that drive it. A localized understanding of issues requires field presence coupled with relevant and adequate expertise to reflect on relationships and dynamics between groups, in conjunction with ongoing monitoring and analysis to ensure the relevance of programmes and operations.

15. Assessing circumstances in a way that takes into account protection and conflict should enable WFP to develop practical relationships and collaboration with humanitarian, development and peacebuilding actors[29] in support of protection outcomes. Indeed, better understanding of the coping mechanisms and capacities of affected populations makes the design of effective programmes and operations more likely. It will also help WFP and its partners to build on its humanitarian interventions to ensure that any action beyond the initial emergency response promotes people of concern's ability to be self-sufficient. Inclusive and conflict-sensitive context analyses are also likely to result in interventions with long-term impact. Without investments in resilience and development, returns on humanitarian action will be marginal. For example, contributions to durable solutions for internally displaced persons can serve as entry points for WFP's work in emergency, development and peace interventions. Such solutions are more likely to be successful if protection is at the core of their design.

16. Sound contextual analysis will help to ensure that the risks and needs of people in the most vulnerable situations are identified in a holistic, focused and accurate manner, in other words that the drivers of vulnerability are comprehensively analysed and understood. Special attention must be paid to the needs of the people who are most at risk, taking into account that there may be many layers of vulnerability such as the probability of violation,[30] abuse, harm, suffering, disadvantage and discrimination.[31] Geography, socioeconomic status, coping mechanisms, power structures, including gender and age and conflict dynamics, are also core to understanding who suffers and how in WFP's areas of operation.[32]

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[29] *See* https://documents.wfp.org/stellent/groups/public/documents/eb/wfpdoc062766.pdf?_ga=2.154412152.1929319844.1589546716-569886101.1576844091

[30] Violations are actions that result in cutting people off from access to food and markets, such as blocking or taking over roads or key logistics hubs like ports, and communities themselves. Similarly, destruction of the sources of livelihoods, such as by setting fire to crops and farmland, inhibit communities' ability to cope and often causes destitution and displacement. See United Nations Security Council Resolution 2417 (2018) on this issue.

[31] For example, persons with disabilities constitute a significant percentage of the people who are disproportionately affected by conflict and humanitarian crises. The Inter-Agency Standing Committee has accordingly developed guidance in line with the Convention on the Rights of Persons with Disabilities. Similarly, indigenous peoples are also among the most marginalized groups globally and face many forms of discrimination, often resulting in their overrepresentation among the food insecure.

[32] https://www.un.org/sg/en/content/sg/speeches/2019-02-25/remarks-the-human-rights-council, last accessed on 9 April 2020.

17. Evidence-based decisions require data that are disaggregated by sex, age, disability, ethnicity, barriers to inclusion and other such factors.[33] Understanding how factors intersect and interact is central to WFP's strengthened approach to protection and to ensuring that its programmes and operations are delivered safely while respecting the dignity and integrity of the people it serves. It is only through engaging individuals and thus acquiring an understanding of their needs that they will give free, prior and informed consent.[34]

Alignment with WFP's actions and frameworks

18. WFP is mandated to support governments in meeting their international commitments and is thus bound by relevant international normative frameworks. Indeed, WFP's purpose and functions are: "a) to use food aid to support social and economic development, b) to meet refugee and other emergency and protracted relief food needs, c) to promote world food security in accordance with the recommendations of the United Nations and the FAO."[35] In humanitarian settings WFP is also obliged to engage and interact with all relevant national, other authorities and non-state groups. Complementarity and coordination, both internally and externally, are key to maximizing protection outcomes.

19. Internally, this policy must inform WFP's other areas of work and focus, as well as the frameworks that define them. Among others, WFP considers that approaches to access, climate, gender, disability inclusion, respect for diversity, data protection and social protection issues are particularly important in reinforcing protection.

Access

20. Access is a broad term that can refer to access to services, to nutritious foods and to markets. It is often considered in conflict situations. Access can be hindered by systemic and structural limitations such as stigma, discrimination, economic and social inequalities and legal barriers.

21. Engagement with affected populations enables meaningful access and access enables protection. Because WFP operates in volatile, complex and insecure environments its ability to establish and maintain principled and safe access is often challenged. WFP's planning for access-sensitive programmes and operations and negotiation of access with official and de facto authorities must be grounded in 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. When negotiating access, protection considerations, along with humanitarian principles, are the primary criteria to be considered in evaluating options and persuading interlocutors.

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[33] Disability data should be collected based on the approach recommended by the Washington Group on Disability Statistics. *See* http://www.washingtongroup-disability.com/methodology-and-research/

[34] *See* United Nations Convention on the Rights of Persons with Disabilities (2006).
https://www.un.org/disabilities/documents/convention/convention_accessible_pdf.pdf

and "Free, prior and informed consent: a human-rights based approach". See also, Study of the Expert Mechanism on the Rights of Indigenous Peoples, A/HRC/39/62 (2018), noting links to the SDGs. https://documents-dds-ny.un.org/doc/UNDOC/GEN/G18/245/94/PDF/G1824594.pdf?OpenElement, last accessed on 10 April 2020.

[35] WFP General regulations, article II. https://docs.wfp.org/api/documents/WFP-0000021766/download/.

22. With these considerations in mind, it is essential that comprehensive context analysis that includes actor mapping and conflict 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 ensure the meaningful inclusion of vulnerable and at-risk groups suffering from exclusionary practices. Experience has shown that building the trust of the people that WFP serves, combined with effective and inclusive action, is essential to winning over leaders and their communities. This will help to ensure sustainable and safe access for people in need of assistance.

Environment and climate[36]

23. Environment and climate change are risk multipliers, amplifying and compounding inequality and vulnerability,[37] particularly where competition over access to scarce resources cause conflict and inequality. As such they must constitute a core issue in context analysis in respect of groups that face particular risks.[38] In other words, WFP must understand the implications of a specific climate shock for a population beyond applying technical adaptation policies. WFP must understand how climate change is exacerbating existing conflict and tensions between communities. Working with communities to respond to shocks and to design disaster risk reduction strategies through means accessible to and in language understood by all must be a prerequisite. Local inputs will facilitate better operational programme design while building on existing coping mechanisms.

Gender

24. Intersectionality is key to applying this protection policy effectively. Structural and socio-cultural gender inequalities will surface through context analysis.[39] By systematically integrating gender into design and implementation, food assistance activities can be adapted to specific needs of women, men, girls and boys. Women and men alike need to be engaged in finding protective food security solutions. Gender analyses enable WFP to understand how structural inequalities are compounded by recurring risks that result in welfare declines and well-being among women. At the same time, such analyses are also instructive in identifying critical gaps that need to be addressed through nuanced and tailored programming that results in strengthened food security, gender and protection outcomes.

25. Another example is the prevalence of gender-based violence,[40] which remains startlingly high in WFP's conflict and protracted crisis settings.[41] Given its prevalence, the prevention of gender-based violence through identifying and addressing its drivers must be included across all areas of WFP interventions.

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[36] See Environmental and Social Safeguards at https://docs.wfp.org/api/documents/WFP-0000023971/download/.

[37] https://docs.wfp.org/api/documents/WFP-0000023971/download/?_ga=2.176231845.1091759073.1579194258.

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

[39] See WFP's gender policy. https://documents.wfp.org/stellent/groups/public/documents/communications/wfp276754.pdf?_ga=2.19765944.1854708687.1585905072-569886101.1576844091.

[40] Definition in line with the WFP Gender Policy at https://one.wfp.org/eb/docs/2009/wfp194044~2.pdf?_ga=2.261304201.508926520.1592300464-1238263986.1562678720 last accessed on 16 June 2020.

[41] https://evaw-un-inventory.unwomen.org/fr/agencies/wfp, last accessed on 9 April 2020.

Disability inclusion

26. Ensuring the inclusion of persons with disabilities is crucial to protection and accountability to affected populations. Persons with disabilities face additional barriers to participation in society compared with their peers, and those barriers, including attitudinal barriers in the form of stigma and discrimination, are exacerbated in times of disaster and crisis. The multi-dimensional links of disability with poverty and malnutrition further contribute to the heightened risk of marginalization and highlight the importance of WFP's commitment to breaking down barriers for persons with disabilities.

27. In this regard, mainstreaming disability inclusion into operations and programming is a strategic and operational commitment by WFP, in line with the broader efforts of the United Nations system. In June 2019 the Secretary-General launched the five-year United Nations Disability Inclusion Strategy, describing its implementation as an "operational imperative" aligned with his commitment to make the United Nations an inclusive organization for all. The strategy is complemented by an accountability framework for monitoring progress in four core areas of responsibility that WFP must address: leadership strategic planning and management; inclusiveness; programming; and organizational culture.

Data protection

28. In carrying out its mandate, WFP processes a large quantity of data, including personal data of its beneficiaries and prospective beneficiaries. Protecting it is a fundamental part of WFP's duty of care to those it serves. Breaches in confidentiality could have dire consequences for individual beneficiaries or beneficiary communities, ranging from abuse and ostracism to death.

29. The processing of personal data carries inherent risks that are often unrecognized and unaddressed. Privacy breaches and the disclosure of data, whether intentional or unintentional, may have important ethical and operational repercussions. The loss, theft or misuse of personal data may cause harm to the people WFP seeks to assist, as well as to WFP personnel.[42]

30. Digital transformation is one of WFP's corporate initiatives, with digital solutions informing programme and operational cycles. WFP's current digitalization process is exponentially increasing the amount and type of data processed. Beneficiaries' personal data must contribute to accountability, inclusion, good programming, assurance and improved coordination with partners. While there are multiple issues, it is necessary to consider them in a manner that takes protection into account as WFP introduces new technologies and services, whether in digital or analog forms. WFP must adopt a person-centred approach that emphasizes the identification of data protection risks and mitigation measures for affected people as part of its context analysis, operational programme design and programme delivery, including the promotion of inclusion and digital literacy. The use of technology when supporting the collection of personal data by WFP and its partners must be informed by protection considerations to prevent potential discrimination or exclusion. Data disaggregation is key to targeting and reaching people in the most vulnerable situations; nevertheless, data protection and privacy principles as well as informed consent[43] must be applied to the collection, storage and sharing of personal data. In addition, WFP's

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[42] See WFP. 2016. *WFP Guide to Personal Data Protection and Privacy*. https://newgo.wfp.org/documents/wfp-guide-to-personal-data-protection-and-privacy. United Nations Chief Executives Board for Coordination High-level Committee on Management. 2018. *Personal Data Protection and Privacy Principles*. https://www.unsystem.org/personal-data-protection-and-privacy-principles.

[43] *See* Amnesty International and others. *Professional Standards for Protection Work, third edition*, ch. 6. https://reliefweb.int/sites/reliefweb.int/files/resources/0999_002_Protection_web.pdf

approach to and use of data, and their consequences, must be explained in ways and languages accessible to affected populations.

Social protection[44]

31. Protection principles must be mainstreamed in WFP's approach to social protection, which requires WFP to support governments to meet their social assistance obligations to their populations in the most difficult situations. In practice, this means that WFP must work to ensure that all needs and vulnerability are understood by governments as changing over time and that the choice of response is made together with affected populations. WFP has a shared responsibility with governments to uphold the right to universal access to social services. This requires the disaggregation of data to identify those most in need, the application of data protection and safeguarding principles and the development of strong feedback mechanisms. The transfer of information to national governments and other relevant authorities must be conditioned on their application of protection mainstreaming principles.

WFP cross-departmental policy coherence

32. To deliver on this protection and accountability policy some institutional shifts are required to expand beyond programmes and operations. The prioritization of protection by management and the leadership group[45] will be the key driver of the policy's effective and impactful implementation. The policy must therefore feature as a core element of the WFP's strategic plan for 2022. This section details the shifts that need to take place in human resources, including capacity development, communications and enterprise risk management.

Human resources[46]

33. The forthcoming WFP people policy (to be adopted in 2021) is a way to ensure that protection becomes everyone's business. It must reflect the content of this policy with regard to inclusion and diversity. In addition, protection is at the core of the training required to build a cadre of high-impact leaders. Field consultations suggest that there is a need for the diversification of employee profiles, for example by loaning employees to other institutions and bringing back knowledge to WFP (and vice versa) to ensure that protection is fully understood within the multilateral system. In the same vein, investment in protection skills development for employees must also be the responsibility of employees with management responsibilities. Drawing on specialized protection expertise must be considered on an *ad hoc* basis and prioritized depending on each situation. Finally, performance appraisals for senior managers must include protection as a core element, including success in the implementation of this Policy. This is in line with United Nations development system reform, in which, among many other things, resident coordinators, starting in 2020, will provide input on one goal of the performance document of every head of agency. Since

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[44] WFP defines social protection as a broad set of arrangements and instruments to protect members of society from shocks and stresses throughout their lives framed under the umbrella of the right to social security. https://www.ohchr.org/EN/Issues/RightSocialSecurity/Pages/SocialSecurity.aspx last accessed on 3 April 2020. The right to social security is the right to access and maintain benefits, whether in cash or in kind, without discrimination in order to secure protection, inter alia, from (a) lack of work-related income caused by sickness, disability, maternity, employment injury, unemployment, old age, or death of a family member; (b) unaffordable access to health care; (c) insufficient family support, particularly for children and adult dependents. *Committee on the Economic, Social and Cultural Rights, General Comment 19. See also International Labour Organisation No. 102 on Social Security.*

[45] Prioritization by the leadership group and a shared understanding of protection across WFP responds to recommendation 4 of the evaluation.

[46] Include protection as core to Human resources processes is in response to recommendation 4 of the Evaluation.

one of the five areas of mutual accountability between the resident coordinator and the country team is human rights,[47] protection must feature as a goal in both the humanitarian and development contexts.

Communications

34. Future communications strategies, whether pertaining to WFP's corporate posture (external communications), monitoring, compliance and upholding of standards (internal communications), or in terms of accountability to affected populations, must be informed by protection considerations. Protection considerations must be integrated into communications materials across these three broad areas of activity. Existing campaigns are an opportunity for awareness raising and advocacy. Internal messaging, monitoring and compliance with protection considerations are vital to organizational consistency and upholding standards. In communications materials directed to affected populations it is vital that messaging be protection-centred to prevent exclusion, stigmatization and discrimination. This implies that communications employees must have the skills necessary to include protection messages in communications materials.

Enterprise risk management[48]

35. WFP's risk management framework[49] is event-based and designed to identify and respond to risks at the point of impact. In addition to anticipating and responding to protection-related risks, other strategic, operational and fiduciary risks (such as fraud, breach of obligations, cyberattacks and programme design risks) that may have an indirect impact on protection must also addressed.[50] Country directors are accountable for implementing risk management effectively within their countries of operation, assigning risk owners at the country office level and chairing regular country office risk discussions to review risk and control information, including possible indicators, and following-up on mitigation measures. In country offices, protection risks as well as risks to WFP as listed in the theory of change should be included in the country office risk register. A twin-track approach will be required, with dedicated protection risk assessments of affected populations and efforts to ensure that protection considerations are taken into account in risk assessments undertaken when new activities or programmes are initiated and in the annual country office risk assessment process, with risks that are beyond the office's risk appetite prioritized for mitigation.

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[47] *See*, Revised Performance Appraisal Tool for Resident Coordinators and Country Teams: Assessment of Results and Competencies (November 2015). (Not available online.)

[48] Integration in enterprise risk management responds to recommendation 2 of the evaluation.

[49] https://docs.wfp.org/api/documents/WFP-0000073078/download/.

[50] This should include examining risks to the reputation of WFP and its implementing partners, such as programme risks related to the inclusion, support or exclusion of individuals or groups that could harm WFP's reputation or operations. This could include support for individuals or groups who incite conflict, violence or hate and thus fuel conflict (strategic); support for individuals suspected to be involved in national or international criminal activities (strategic); involvement or direct implication in violations of human rights law or international humanitarian and refugee law, including sexual exploitation (strategic); and violations of United Nations Security Council sanctions, depending on country context (strategic).

Sexual exploitation and abuse

36. Sexual exploitation and abuse is an extreme form of abuse of power for sexual purposes by which WFP employees or those associated with the work of WFP[51] take advantage of the vulnerability of the very people they are meant to serve. As such, sexual exploitation and abuse is a significant protection concern for WFP. Protection from sexual exploitation and abuse measures must be integrated into all WFP operations and programming in order to safeguard beneficiaries and ensure that they can safely access WFP programmes without being subject to sexual exploitation or sexual abuse by WFP employees or its partners; if such exploitation or abuse is attempted or committed, WFP must report it, conduct an independent investigation and respond swiftly with a victim-centred approach. This can be facilitated for example through on-site monitoring or effective community and feedback mechanisms.

Partnerships[52]

37. WFP must partner with a wide range of actors to strengthen the impact of its programming. Partnering can also strengthen local capacity as well as WFP's. Partners are held to the same protection standards as is WFP, and partnerships must offer logistical support for broader sectoral responses that are coordinated and combined to achieve effective long-term protection outcomes. Partnerships must integrate do-no-harm principles and ensure that conflicts of interest do not arise.

Accountability to affected populations

38. Accountability to affected populations is a particularly important area of focus given that the populations WFP serves are its primary partners. Participation, engagement and empowerment are key mainstreaming principles.[53] This means ensuring that affected populations, their families and diverse community organizations representing young people, older people, indigenous peoples, people living with HIV/AIDS and persons with disabilities participate in the decisions that affect their lives, receive the information they need to make decisions and have access to safe and responsive mechanisms for providing feedback.[54] It also means working to ensure that they have safe and dignified access to assistance in proportion to their needs, priorities and preferences. Heavily investing in engagement with affected populations[55] through adapted accessible means in languages that are understood 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. This two-way communication with affected populations

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[51] WFP operates in the most severe, crisis-affected environments, relying on more than 1,000 cooperating partners, as well as other partners such as financial service providers, contractors, vendors and governments.

[52] Building partnerships responds to recommendation 3 of the evaluation.

[53] https://www.globalprotectioncluster.org/themes/protection-mainstreaming/.

[54] Feedback is an overarching term to include a community or feedback provided by an individual or a group of people. Feedback can be formal (captured through specific mechanisms and processes) or informal (captured in an ad hoc manner). All feedback requires a closed feedback loop. This can only be achieved once the individual or group of people who submitted the feedback has expressed satisfaction with the action. A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action of WFP or a partner organization or their employees. It is a criticism that expects a reply and calls for something to be changed. In the context of this policy, a complaint is an external grievance asserting that WFP or a partner or any of its employees has made mistakes, acted wrongfully, breached applicable codes of conduct or failed to meet a commitment. Feedback relates to an expression of concern, a statement of thanks or appreciation or a sharing of a question or suggestion.

[55] Accountability to affected populations comprises a range of mechanisms, for example, setting up software or hotlines for a community feedback mechanism.

must be supported by the development of a system-wide engagement strategy.[56] This includes ensuring that activities designed at the field level with affected populations are validated by those same affected populations. Mechanisms for providing positive and negative feedback must also be set up to ensure that programmes and operations respond to needs as they evolve.

External operational and strategic partnerships

39. The context analysis described above must inform when and how WFP should partner or coordinate with other actors, including its cooperating partners, and help determine what WFP's protection role should be. Protection analysis that emerges from programmes and operations must be made available to other actors and inter-agency forums, such as the humanitarian country team, in particular to support multisectoral and multidisciplinary strategies and interventions. WFP must also partner strategically with actors strong on protection monitoring to ensure that programmes and operational plans are adequately informed. In addition, WFP must enable actions through its logistical capacity and cluster leadership roles. In some cases, WFP must leverage its size and scope to provide advocacy support and partner with other specialized actors to ensure a coordinated and complementary approach. WFP must benefit from existing frameworks and mechanisms such as the humanitarian country teams and humanitarian response plans and its coordinating role and membership in the cluster system, United Nations country teams and partnerships with entities such as the Office of the United Nations High Commissioner for Refugees, the United Nations Children's Fund and other United Nations entities with expertise in protection.

40. As indicated in the Inter-Agency Standing Committee centrality of protection frameworks,[57] at times advocacy will involve engaging senior figures to raise concerns about people's safety rather than leaving that task to humanitarians on the ground. At the global level, WFP will continue to engage with global protection forums to ensure that it informs policy discussions and remains aware of developments that may affect its own strategies, programmes and operations.

Donor relations

41. To achieve the ambitious change in its way of working described in this policy, WFP will continue to work in the four areas of acceleration identified in the WFP 2019–2021 Strategy for Protection and Accountability to Affected People.[58] 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 must be updated to reflect protection as a priority.

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[56] Developing and implementing an engagement strategy responds to recommendation 6 of the evaluation.

[57] https://www.globalprotectioncluster.org/_assets/files/field_support/PC%20Coordination%20Toolbox/communication _package_on_protection/youre-already-part-of-it-en.pdf.

[58] https://newgo.wfp.org/documents/wfp-guide-to-personal-data-protection-and-privacy. The four areas of acceleration are analysis and implementation; partnerships; systems; and leadership and expertise.

42. The necessary flexible resources must be consistently made available from both the core budget (direct support costs and the programme support and administrative budget) and extrabudgetary contributions. Donor coordination and flexible funding tools will be critical to enabling the successful implementation of the proposed approach.

Reporting, monitoring and compliance[59]

43. For this 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 other relevant authorities, and between WFP and its Executive Board. Internally, WFP must work on its corporate results framework to ensure that it adequately measures results on the ground. In this regard, for the policy to be actionable, guidance, tools and resourcing will be required. The policy must reinforce and, wherever possible, inform government-led food security plans and programmes. Mutual accountability with donors is required to ensure that implementation of the updated policy is prioritized, funded, time-bound and monitored by all parties.

44. Protection must be a standing agenda item at WFP senior management meetings, for which regional bureaux and selected country programmes and operations must be requested to provide written updates on implementation of the revised protection policy in their areas of operation.

45. Roles and responsibilities for oversight, reporting and monitoring are outlined in the following paragraphs.

Institutional level

46. WFP engages publicly in a range of fora, including for example its yearly updates to the Executive Committee of the Secretary-General and to the General Assembly, as well as its participation in the open debate in the Security Council on the protection of civilians. This engagement and reporting must reflect senior management's commitment to protection and contribution to protection outcomes.

47. The Assistant Executive Director, Programme and Policy Development Department, must ensure the alignment of actions and frameworks to ensure policy coherence.

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

Operational level

49. Coherent working structures must reflect this policy at headquarters and in regional bureaux and must be aligned with and must complement initiatives under United Nations sustainable development and cooperation frameworks and of country offices. Implementation of this policy at the country level must be the responsibility of country directors and heads of programmes.

50. Protection must underpin WFP country strategic plans, which should complement the work of other partners across the multilateral system.

51. Informal peer reviews of progress in implementation of this policy must be requested by global inter-agency forums; a framework for these reviews must be developed.

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[59] Leadership and human resources focused on employees skilled in protection respond to recommendation 4 of the evaluation.

52. The Director, Programme – Humanitarian and Development Division must ensure that second-generation country strategic plans have clear protection objectives and costing.

53. As in any other policy area, non-compliance with this policy will require reporting, review and remedial action:

   ➢   WFP must keep the Board informed of any delays or challenges in implementing the progressive measures for implementing this policy.

   ➢   A mid-term review must be conducted during the third year of implementation.

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 to be the subject of training to build the skills of senior staff 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.