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Evaluation of the WFP Humanitarian Protection Policy

Evaluation Report: Volume I

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Disclaimer

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Executive Summary

Introduction

Evaluation features

1. The WFP humanitarian protection policy was approved by the WFP Executive Board in February 2012,[1] and an update was presented to the Board at its 2014 annual session.[2] As well as complying with the WFP requirement that policies be evaluated within four–six years of first implementation, the evaluation was timely given the adoption of the Sustainable Development Goals (SDGs) and the rollout of WFP's Integrated Road Map (2017–2021).

2. The evaluation assessed implementation of the policy from 2012 to 2017 and posed three main questions:

   - How good is the policy?
   - What were the results of the implementation of the policy?
   - Why has the policy produced the results that have been observed?

3. The evaluation was conducted between January and December 2017 with evidence collected at the global, regional and country levels through:

   - extensive review of documents and literature, including 23 standard project reports and related evaluations, policies and guidance;
   - field missions to country offices in Afghanistan, the Democratic Republic of the Congo, El Salvador, Lebanon, the Niger and Uganda;
   - desk studies of Colombia, Iraq, Malawi, Nigeria, Pakistan and Somalia;
   - electronic surveys of cooperating partners and WFP staff;
   - review of comparator organizations;[3]
   - analysis of data from monitoring and complaint and feedback mechanisms; and
   - more than 500 key informant interviews with WFP staff at headquarters, regional bureaux and country offices, beneficiaries, partners and donors.

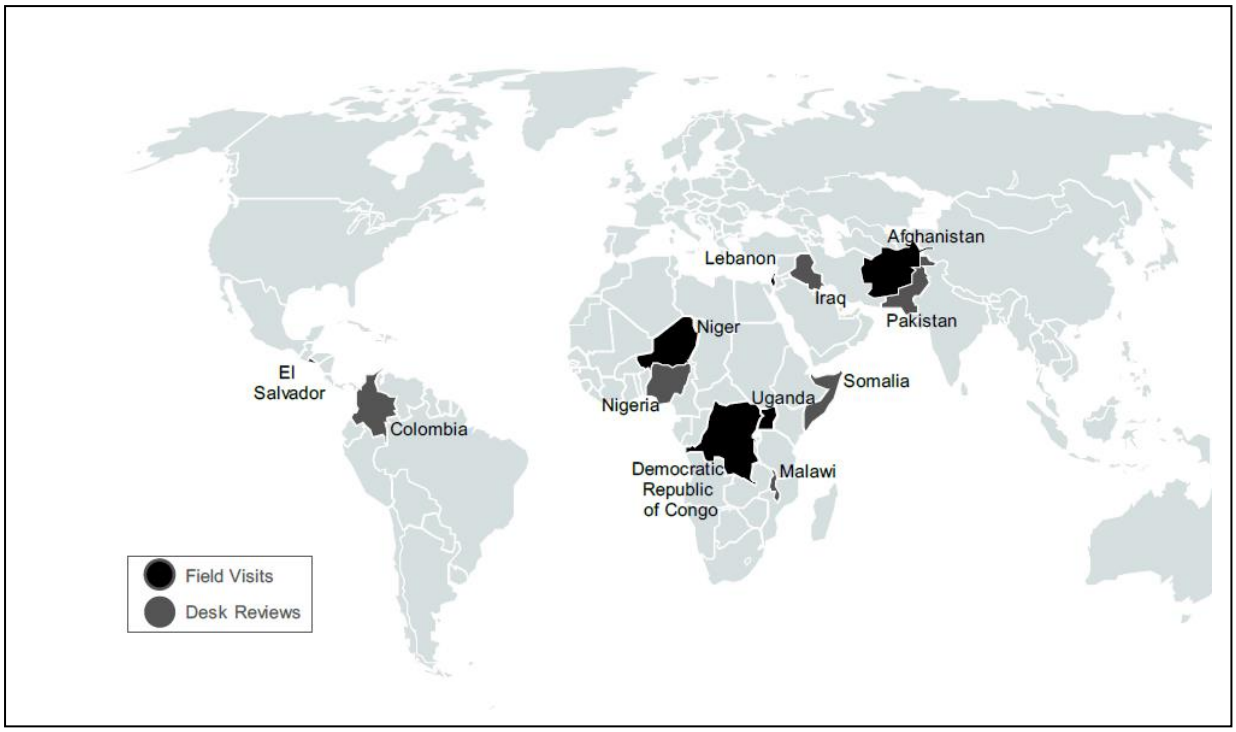
4. Data were fully triangulated during the analysis phase.

[1] As presented in the document "WFP Humanitarian Protection Policy" (WFP/EB.1/2012/5-B/Rev.1).

[2] "Update on the Implementation of the Protection Policy" (WFP/EB.A/2014/5-F).

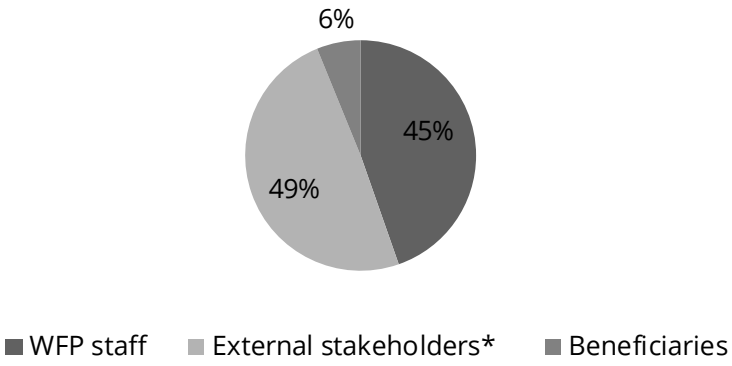
[3] DanChurchAid, the United Nations Children's Fund and the Swedish International Development Cooperation Agency.

Figure 1: Geographic coverage of the evaluation



Source: Evaluation team.

Figure 2: Categories of people consulted across the 12 country studies



* External stakeholders included protection professionals and the staff of partner non-governmental organizations, other United Nations agencies, governments, donors, etc.

Source: Evaluation team.

5. Limitations constraining the evaluation included difficult access to some beneficiaries and affected groups because of logistics and security constraints in several countries; lack of outcome-level data; and limited access to data on protection because of fragmented reporting. Despite these limitations, the evaluation team developed valid findings and conclusions.

6. WFP's Office of Evaluation launched the evaluation in parallel with an evaluation of WFP's policies on humanitarian principles and access in humanitarian contexts. As a result, the security of WFP staff and operations, access negotiations, partnerships other than with cooperating partners and general adherence of partners to humanitarian principles were considered to be outside the scope of the protection policy evaluation.

Context

7. The past two decades have witnessed a convergence of human rights and development, particularly in international political statements and policy commitments.[4] The conclusions of the 2016 World Humanitarian Summit confirmed the importance of protection as one of five "core responsibilities".[5] Similarly, the 2013 statement on the centrality of protection[6] by the United Nations Inter-Agency Standing Committee (IASC) affirmed the commitment of IASC to making protection a core element of humanitarian action.

8. The IASC definition of protection is widely used by the humanitarian community. It states that protection encompasses: "all activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and spirit of the relevant bodies of law", namely, international human rights, humanitarian and refugee law.[7]

9. United Nations organizations are increasingly making practical links among global and corporate policies and guidelines and actual practice in the field.[8] This work includes addressing the protection challenges faced by affected populations and the dynamics that undermine the safety, integrity and dignity of people in complex, high-risk operational contexts.

10. In the United Nations, systemic constraints on improving protection include resistance to change in the humanitarian system; geopolitical factors shaping decisions of the United Nations Security Council; and the instrumentalization of humanitarian action in support of political or military agendas.[9]

WFP policy framework for protection and its implementation

11. Among the United Nations system humanitarian entities that do not specialize in protection, WFP was one of the first to formalize its protection responsibilities by adopting an explicit policy. The policy, adopted in 2012, was supported by an implementation plan of the same year, and an update on the implementation of the policy (figure 3).

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[4] World Bank and Organisation for Economic Co-operation and Development (OECD). 2013. *Integrating human rights into development: Donor approaches, experiences, and challenges*, second edition. Washington, DC; OECD. 2007. *DAC action-oriented policy paper on human rights and development*: http://www.oecd.org/dac/governance-development/39350774.pdf

United Nations. 2010. World Summit Outcome Document. http://www.un.org/en/mdg/summit2010/pdf/mdg%20outcome%20document.pdf

OECD. 2008. Third High-Level Forum on Aid Effectiveness, 2–4 September 2008, Accra: http://www.oecd.org/dac/effectiveness/theaccrahighlevelforumhlf3andtheaccraagendaforaction.htm

[5] World Humanitarian Summit. 2016. *The Grand Bargain: a shared commitment to better serve people in need.* Istanbul: https://reliefweb.int/report/world/grand-bargain-shared-commitment-better-serve-people-need.

[6] IASC. 2013. *The centrality of protection in humanitarian action*, Statement by the IASC Principals: https://interagencystandingcommittee.org/principals/content/centrality-protection-humanitarian-action

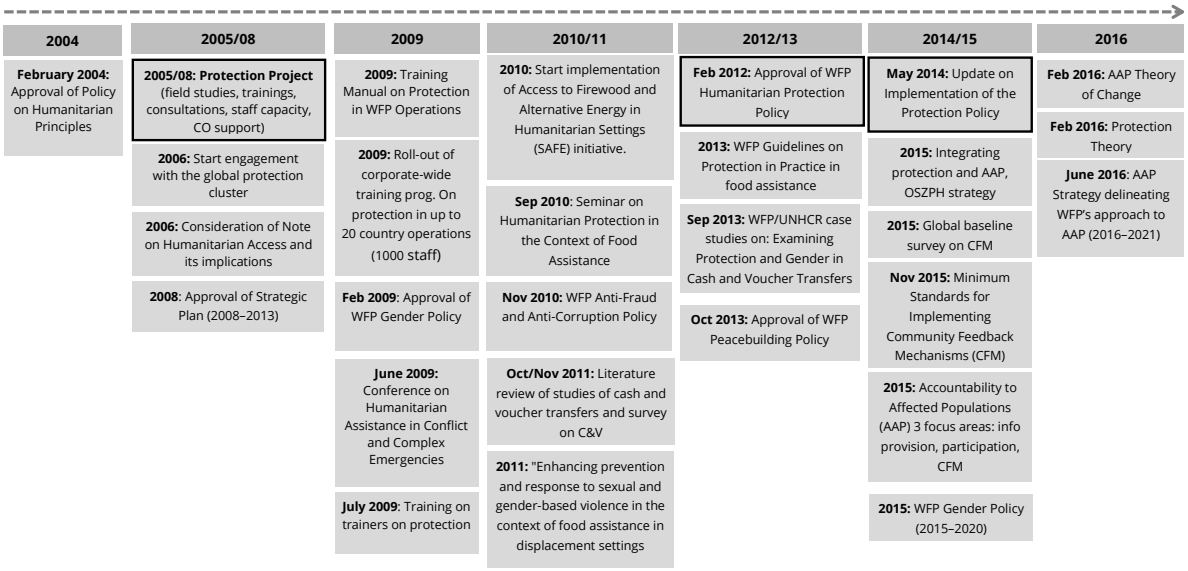
[7] IASC. December 1999. *Protection of Internally Displaced Persons. New York.*

[8] There is a growing array of models for linking global policy and guiding principles for operations. See OECD. 2007. Principles for good international engagement in fragile states and situations: https://www.oecd.org/dac/conflict-fragility-resilience/docs/38368714.pdf

Office for the Coordination of Humanitarian Affairs. 2017. New way of working https://www.unocha.org/sites/unocha/files/NWOW%20Booklet%20low%20res.002_0.pdf

[9] Niland, N., Polastro, R., Donini, A. and Lee, A. 2015. *Independent whole of system review of protection in the context of humanitarian action*. Norwegian Refugee Council: https://interagencystandingcommittee.org/sites/default/files/independent_whole_of_system_protection_review_report_may_2015.pdf

Figure 3: Key protection milestones



12. The policy accords with the principle of mainstreaming protection throughout programming. It reflects a definition of protection that draws on the IASC definition; international policy discourse on protection activities; and WFP's internal reflections on protection. In addition, it includes a description of the implementation process.

13. The policy adopts a specific definition of protection that is "practical" and "centred on assistance": "designing and carrying out food and livelihood assistance activities that do not increase the protection risks faced by the crisis-affected populations receiving assistance. Rather, food assistance should contribute to the safety, dignity and integrity of vulnerable people".

14. The policy sets out six interlinked, non-sequential directions for WFP to follow in order to achieve the overall goal of enhancing protection (see table 1). It was supported by a phased implementation plan from July 2012 to June 2016, but lacked an explicit objective and intermediary milestones for measuring progress. A theory of change was developed in 2016 but was not formally adopted as a tool for implementing the policy.

15. Protection is referenced in a number of other policy documents, notably those on gender,[10] peacebuilding[11] and WFP's role in the humanitarian assistance system.[12] WFP has acknowledged that underlying causes of hunger and vulnerability include those resulting from protection issues.[13]

[10] "Gender Policy (2015-2020)" (WFP/EB.A/2015/5-A).

[11] "WFP's Role in Peacebuilding in Transition Settings" (WFP/EB.2/2013/4-A/Rev.1.).

[12] "WFP's Role in the Humanitarian Assistance System" (WFP/EB.1/2010/5-C); "Update on WFP's Role in the Humanitarian Assistance System" (WFP/EB.A/2013/5-C); "Update on WFP's Role in the Humanitarian Assistance System" (WFP/EB.A/2014/5-A).

[13] This acknowledgment informs WFP's emergency and transition programme framework, in which one of the "5 Rs", the "Right Way", refers to the importance of protection and accountability to affected populations – see http://docustore.wfp.org/stellent/groups/wfp/documents/communications/wfp280952.pdf

16. The WFP Integrated Road Map and associated strategic planning documents reference the protection policy and related policies.[14] In the WFP Strategic Plan (2017–2021) and the Corporate Results Framework (2017–2021), protection figures as a cross-cutting objective for development and humanitarian operations, alongside gender equality and accountability to affected populations.

[14] "WFP Strategic Plan (2017–2021)" (WFP/EB.2/2016/4-A/1/Rev.2), sect. III, "Positioning WFP in relation to the 2030 Agenda for Sustainable Development".

TABLE 1: THE SIX DIRECTIONS FOR POLICY IMPLEMENTATION					
Policy direction					
1 Investing in institutional capacity for context and risk analysis	**2 Incorporating protection into programme tools**	**3 Integrating protection into programme design and implementation**	**4 Developing staff capacity**	**5 Establishing informed and accountable partnerships**	**6 Managing protection-related information**
1. Enhancing WFP's capacity for consistently thorough context analysis 2. Providing WFP with insights into the power relations and dynamics that affect the protection of local populations and gender relations 3.Understanding the risks that WFP faces in feeding vulnerable and marginalized populations and contributing to the protection of these populations	1. Identifying linkages between food insecurity and the protection risks, vulnerabilities, coping strategies and capacities of affected populations 2. Facilitating more systematic tracking and measurement of protection risks 3. Informing programme design and the selection of food assistance modalities that are safe and culturally appropriate	1. Ensuring that WFP programmes take into consideration the safety and dignity of, and respect for, the rights of beneficiaries 2. Ensuring that programmes contribute to overall protection outcomes for the people WFP assists 3. Enhancing programme design by implementing strategies for improving accountability to affected populations	1. Training staff in context analysis, risk assessment and the management and processing of protection-related information 2. Raising the awareness and sensitivity of staff and partners to people's rights and the obligation of states to provide, respect and protect those rights, and to the Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organizations in Disaster Relief* and the humanitarian principles of WFP	1. Building the protection knowledge and competencies of cooperating partners and ensuring that all partners are sensitized to the principles and norms that underpin the protection of beneficiary communities 2. Ensuring that protection is mainstreamed into activities of the global food security, logistics and emergency telecommunication clusters	1. Enhancing WFP's information management mechanisms in order to ensure that sensitive data are handled securely, in accordance with clear principles and procedures, to avoid putting beneficiaries at risk 2. Ensuring that WFP has clear policies and procedures for guiding staff who become aware of or witness abuses and violations and for protecting the confidentiality of related information

* https://www.icrc.org/eng/assets/files/publications/icrc-002-1067.pdf

Source: Prepared by the evaluation team based on document WFP/EB.1/2012/5-B/Rev.1.

Findings

Quality of the policy

17. The evaluation found that WFP's humanitarian protection policy clearly drew on international discourse. It did not articulate a specific vision or provide contextual analysis, but it was clearly informed by the WFP protection project of 2005–2008, which generated organizational change and increased recognition in WFP of the significance of protection and its importance in the provision of food assistance. Inclusive and participatory processes for formulating the policy allowed the assimilation of insights from a broad cross-section of WFP and non-WFP personnel.

18. The process of developing the policy contributed to greater sensitivity to protection throughout WFP, which was consistent with the increasing prioritization of protection and human rights in global emergency response, as expressed for example in the Human Rights Up Front initiative[15] and the IASC protection policy.[16] WFP's increased sensitivity to protection also reflects thinking in other areas relevant to development, including on the rights-based approach and greater use of partnerships.

19. The policy was found to be in line with relevant WFP guidance and policies and consistent with those of comparable humanitarian agencies. It encouraged the development of related strategies, such as those for accountability to affected populations and data protection.

20. The policy provided support for the development of a focus on human rights in both humanitarian and development contexts, with an emphasis on minimizing risks and maximizing safety, integrity and dignity in addressing the food needs of crisis-affected populations.

21. At the time it was formulated, the policy was deliberately kept broad in scope and ambition. This strategy succeeded in securing institutional buy-in and largely reconciling various internal and external perspectives on the nature and scope of WFP's responsibilities in protection.

22. The duality of the broad scope alongside the specific definition used by WFP reflected internal compromises, however. The difference between WFP's responsibilities to direct beneficiaries – the actual recipients of food assistance – and its responsibilities to broader crisis-affected or vulnerable populations has influenced how the policy is interpreted and applied in practice. In the absence of senior management's clear support for a broader understanding of WFP's protection responsibilities, a more restrictive definition has been applied by WFP staff.

23. Such tensions within the policy definition and its interpretation are considered to have increased the risk that some of WFP responsibilities will be neglected, particularly those towards affected populations that are not direct recipients of WFP assistance. Specifically, the "centrality of assistance" approach that was adopted by WFP concentrated on the way in which WFP delivers food assistance, but provided limited guidance or incentives to facilitate strategic-level action to address the protection implications of practices that deliberately undermine food security.

24. The evaluation found that both the policy and ancillary guidance material lacked a clear framework of responsibility and accountability for senior managers. Essentially, the policy

[15] United Nations Secretary General. 2013. *Human Rights Up Front Initiative* https://www.un.org/sg/en/content/ban-ki-moon/human-rights-front-initiative.

[16] IASC. 2016. *Inter-Agency Standing Committee Policy on Protection in Humanitarian Action (available at* https://interagencystandingcommittee.org/system/files/iasc_policy_on_protection_in_humanitarian_action_0.pdf).

focuses primarily on capacity development activities to serve the objective of what it calls "sustained engagement"; this focus is reinforced in the 2014 update on the implementation of the policy.[17]

25. The policy was found to lack a precise objective that went beyond internal capacity building and related to external outcomes. During the evaluation, various WFP staff members referred to difficulties in translating the protection policy into practice in diverse contexts.

26. The evaluation noted improved corporate reporting on protection: between 2014 and 2015 an increasing number of projects reported on performance against the two corporate indicators for protection. Corporate indicators show an apparently improved performance, with a greater *number* of projects meeting their protection targets in 2015 compared with 2014. The overall *percentage* of all WFP projects meeting protection targets, however, dropped in 2015 compared with 2014.

TABLE 2: PROGRESS AGAINST WFP CORPORATE INDICATORS FOR PROTECTION 2014–2015

Indicator	No. of projects reporting performance data		No. of projects meeting targets*		% of projects meeting targets*	
	2014	2015	2014	2015	2014	2015
Proportion of assisted people who do not experience safety problems travelling to and from and while at WFP programme sites	57	80	57	78	100	98
Proportion of assisted men who do not experience safety problems travelling to and from and while at WFP programme sites	67	72	67	71	100	99
Proportion of assisted women who do not experience safety problems travelling to and from and while at WFP programme sites	66	72	63	71	95	99
Proportion of assisted people informed about the programme	49	77	43	51	88	66
Proportion of assisted men informed about the programme	65	76	50	52	77	68
Proportion of assisted women informed about the programme	66	76	50	53	76	70

* "meeting project target" means meeting more than 88.9 percent of the target.

[17] "Update on Implementation of the Protection Policy" (WFP/EB.A/2014/5-F).

Source: Evaluation team, based on 2014–2015 data from WFP's DACOTA database and COMET country office tool for managing effectively.

27. The corporate indicators were found to be too narrowly defined to inform programmes on specific protection issues. They provided little information about empowerment or the extent to which WFP contributes to an operational environment where rights are respected.

28. The evaluation also found a broad conflation of gender and protection issues so that gender was considered in terms of gender-based violence rather than women's empowerment.

Policy results

Policy directions

29. WFP invested in diverse efforts to strengthen its engagement in protection. These included boosting capacity through training and the recruitment of regional humanitarian advisers, integrating new indicators into the corporate results framework and developing guidance on protection, accountability to affected populations, gender-based violence and data protection.

30. The evaluation found uneven progress in the six policy directions, with greater advancements in internal capacity development than in the management of partnerships and protection-related information. In country offices, protection was found to compete with other organizational priorities.

31. *Policy direction 1*: A context analysis system was put in place and clear guidance on protection analysis was incorporated into the protection manual and training. The extent to which country offices actually engaged in analysis of contexts and protection risks, however, was highly variable and not systematic. Some monitoring and assessment tools were successfully adapted to allow the integration of protection analysis.[18]

32. *Policy direction 2:* Protection practices and knowledge started to be integrated into programme tools, but integration was not yet systematic because of inconsistent application of the policy and related guidance. Post-distribution monitoring tools increasingly included questions on protection and vulnerability, but they did not always capture the harmful coping mechanisms that exist in many countries. In 2017, 87 percent of country offices had community feedback mechanisms,[19] and the evaluation identified efforts to establish two-way communication with communities. These tools require further development, however, to ensure that grievance systems are more culturally comprehensible, trusted and accessible.

33. *Policy direction 3:* The evaluation found examples of protection being an important consideration in the design of assistance or targeting.[20] Overall, the programmes observed by the evaluation demonstrated potential to deliver good protection outcomes, but these outcomes were often not planned for at the design stage, and are not yet reflected or understood as a cross-cutting result (box 1). There is evidence that modalities such as food assistance for assets and cash-based transfers enhanced the dignity and integrity of beneficiaries by providing greater choice in how they receive and use WFP assistance.

[18] Some country offices have made specific provisions for identifying protection issues in vulnerability analysis and mapping (VAM), particularly in mobile VAM (m-VAM) as observed in Afghanistan and the Democratic Republic of the Congo.

[19] WFP. 2017. Annual Performance Report (advance draft).

[20] For instance, the Democratic Republic of the Congo and El Salvador country offices used protection risk as a criterion for targeting victims of violence – returnees and migrants.

34. *Policy direction 4*: Considerable investments were made in protection training, but there is little evidence that the training fully translated into practice. WFP personnel showed considerable interest in understanding and thinking through protection risks and opportunities for addressing them, but many remained unclear on specific practices that they should undertake.

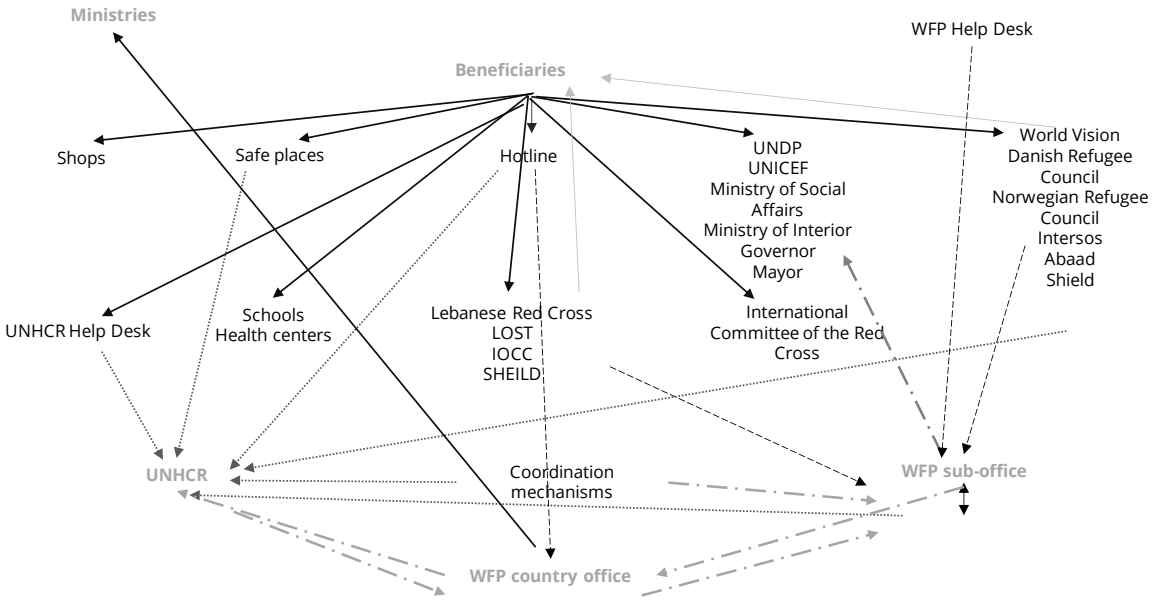
Box 1: Links between strategic programming and protection

Concerns about social cohesion in Lebanon, which hosts the largest refugee population per capita in the world, gave rise to the Lebanese Crisis Response Plan in 2014. The plan acknowledges the need to address vulnerability throughout the country and the implications of hosting large concentrations of refugees for communities that are "sharing their land, their schools, their water resources and health centres". The plan is part of an overall stabilization strategy for addressing social discord while strengthening the capacity of national and local service delivery systems. While WFP was not heavily involved in the launch of the plan, WFP's programmes and work to address protection concerns in its activities converge with the plan's objectives. In addition, WFP's country programming seeks to defuse tensions and hence enable refugees to maintain asylum in Lebanon.

35. *Policy direction 5:* Partnerships were found to be underutilized in implementing the policy, although progress was made through the inclusion of protection considerations in field-level agreements and strategies for partnering with retailers for cash-based transfers. WFP actively participated in protection clusters, but its engagement was often limited to the exchange of information and was generally not leveraged to flag protection issues for system-wide advocacy. The most significant partnerships for joint protection activities were with the Office of the United Nations High Commissioner for Refugees (UNHCR) in the context of which referral systems and inter-agency follow-up were of varying quality.

36. *Policy direction 6:* One of the most striking things observed during the evaluation was a lack of clarity regarding protection reporting, hotlines and referral systems, including how to safeguard protection-related information collected by WFP and its partners. WFP has made pioneering progress in developing guidance and systems for ensuring the protection and privacy of beneficiary data but, as illustrated in figure 4, information is not systematized and consolidated at the organizational level, nor is it integrated into systematic context analysis. This potentially exposes beneficiaries to protection risks and WFP to reputational risks.

Figure 4: Formal and informal referral and reporting of protection information in Lebanon



Legend

- Beneficiary content
- To UNHCR
- WFP reporting
- Partner reporting

Source: Evaluation team.

Achievement of outcomes

37. The evaluation recognizes that measuring protection outcomes is challenging given the influence of many external factors on protection risks and coping capabilities and the lack of baseline data. Despite this, using the 2016 theory of change as a tool for assessing outcomes, the evaluation found that positive outcomes had been achieved in several areas, including reduced safety risks and heightened respect for beneficiaries.

38. The efforts of WFP and cooperating partners created an environment where the exposure of beneficiary groups to threats was reduced in many locations.[21]

39. In more stable settings, the evaluation showed that WFP teams sought to mitigate hunger while minimizing protection incidents before, during and after distribution activities. The use of a "protection lens" when managing pipeline breaks was considered highly effective in revealing and addressing new risks regarding negative coping mechanisms.

40. WFP demonstrated a strong institutional awareness of the importance of avoiding discrimination and providing support in a manner that respected the dignity of recipients. Focus groups and individual interviews with affected populations showed that beneficiaries were treated with respect while participating in programmes, although they sometimes lacked a clear understanding of distribution priorities.

41. By differentiating targeting by gender, age, disability status and diversity, WFP programmes were well tailored to specific needs and capacities. While there was no evidence of

[21] The evaluation team observed such reductions in particular in the Democratic Republic of the Congo and Lebanon.

discrimination towards groups receiving assistance, some groups were less well-served than others.

42. In field operations visited, the specific food needs of young people and children were not specifically assessed outside school meals programmes. For example, in countries where youth are targeted by criminal groups, reinforced partnerships with local youth institutions could be given greater priority to reduce their exposure to risks. The use of adapted tools could have improved consultations with extremely vulnerable individuals, unaccompanied minors, host communities and minority groups.

43. Stakeholders interviewed highlighted that given its significant field presence and role in inter-agency coordination mechanisms, WFP was well positioned to advocate for and influence dialogue on protection issues more actively with local, national and international actors. It was felt that such decisions were left to the discretion of country offices, which generally prioritized the rapid delivery of assistance over more strategic engagement in protection.

Explanatory factors for results achieved

External factors

Donor support and funding

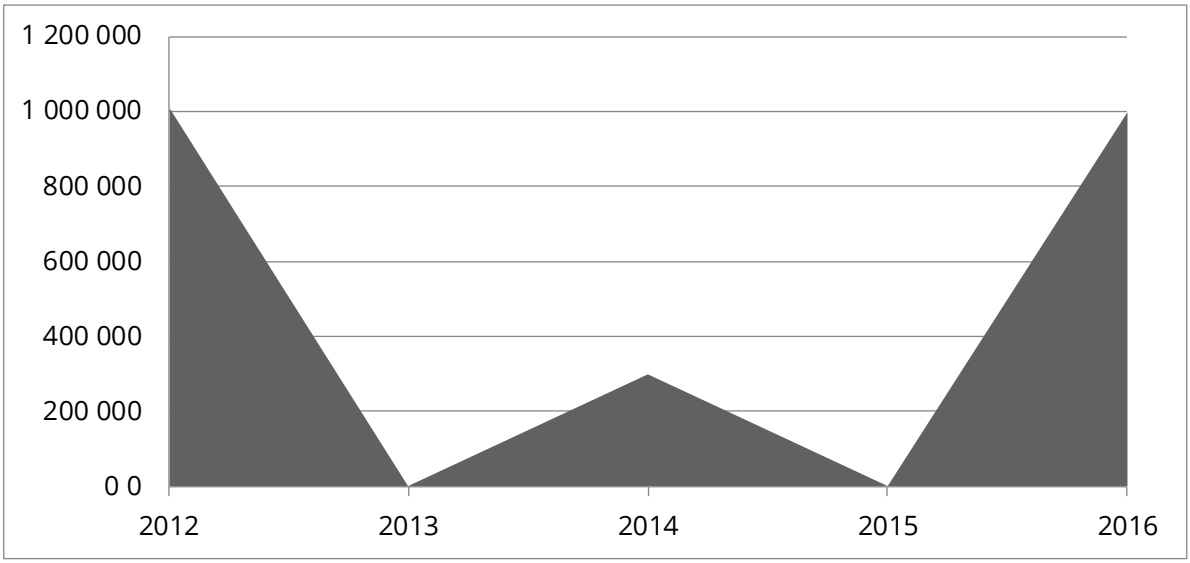
44. The evaluation revealed that donors consistently expect greater integration of protection into WFP analysis and programming. Interviews at the country level showed that donors were willing to fund positions and activities dedicated to protection, but the lack of systematic reporting on and analysis of protection concerns prevented WFP from mobilizing such resources by showing the full value of its interventions.[22]

45. Overall, lack of resources hampered policy implementation and the hiring of dedicated protection personnel throughout WFP. Funding for the protection function at headquarters never exceeded USD 1.6 million per year and was critically low at the launch and rollout of the policy between 2012 and 2014 (Figure 5). Funds were used mostly for internal capacity development.

46. Expenditure at the country level was less easy to identify, however, and much of senior management in country offices admitted that investing in technical capacity for protection was not a priority.

[22] For example, programmes with impacts relevant to protection, such as emergency school meals in Uganda, had to be closed because of lack of funding.

Figure 5: Donor contributions to the trust fund for humanitarian protection Project III



Source: Evaluation team, based on WFP data and reporting on donor contributions.

Partnership and coordination

47. WFP's active participation in protection clusters connected it to a range of partners with which to seek common approaches and solutions to protection issues. Interviewed staff spoke of a fear of encroaching on the specific protection mandates of other agencies, however. Most cooperating partners appreciated WFP's involvement in protection, but the organization was generally not yet perceived as a solid partner in protection. Despite training, the low awareness and capacity of some national cooperating partners were found to constrain WFP's approach to protection.

48. At times, strategic alliances and partnerships with governments constrained policy implementation. In some cases, the risk of damaging relationships with government and negatively affecting the access required for operations influenced WFP's approach to protection advocacy. Stakeholders suggested that WFP did not always use its leverage in favour of crisis-affected populations beyond adapting the way in which it delivered its assistance.

Internal factors

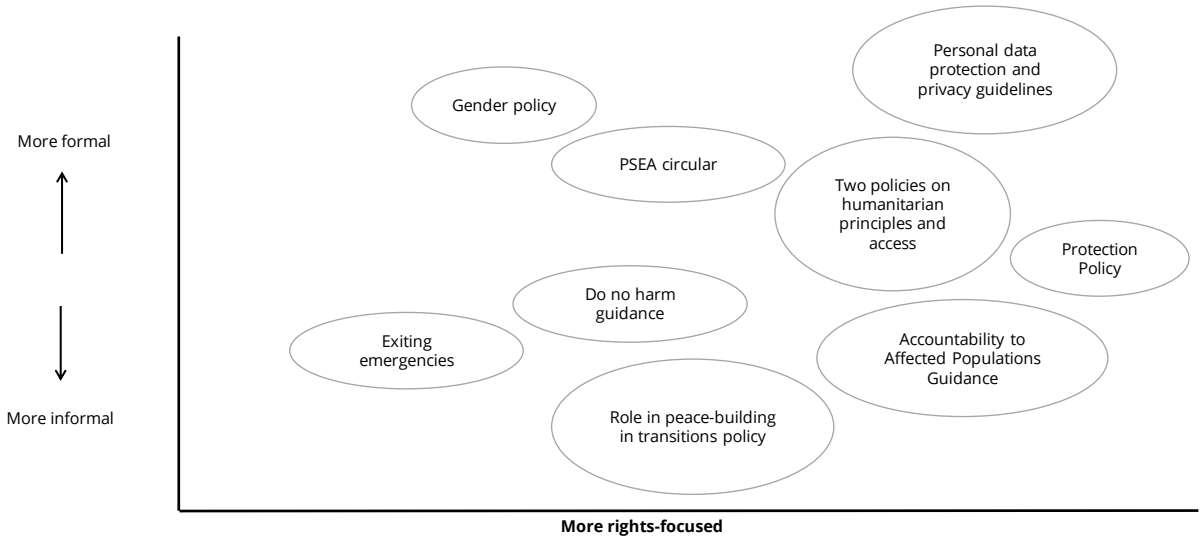
Policy building and quality

49. The relevance of the humanitarian protection policy was enhanced from the outset by the thorough bottom-up process of policy development, which made protection visible within WFP and allowed the policy to overcome internal resistance. A number of limitations undermined policy implementation, however.

50. The lack of a coherent corporate vision resulted in the policy being implemented to varying extents and in policy implementation being interpreted in different ways in WFP. In addition, the evaluation found that ambiguity in the definition of protection limited WFP's role in protection, which was "centred on assistance" and not "on people".

51. The evaluation found that the protection policy was one of the numerous policies in WFP's complex normative system. As such it was not sufficiently substantive to make protection a core responsibility in WFP. While all policies are in principle consistent and equally weighted, in practice interlinkages are not always clearly defined. Competing and overlapping policy priorities inhibited the organizational change called for in the policy.

Figure 6: Normative documents relevant to protection



Source: Evaluation team.

52. The pressure to demonstrate target-based results hampered full engagement in protection programming. WFP managers were compelled to develop and highlight an approach to protection that generated quantitative evidence-based results while understating more qualitative aspects. Reporting on protection against corporate indicators remained too narrow, while valuable information collected in the field remained scattered across WFP. This resulted in a failure to adequately convey WFP's potential and existing protection practices.

53. Interlinkages with the gender policy both benefited and constrained implementation of the protection policy.[23] Both policies faced similar challenges throughout implementation, but the protection policy was not given a comparable level of priority and visibility throughout WFP. Organizational responsibilities were weaker in relation to protection considerations than in relation to gender.[24] The protection policy did not benefit from mandatory corporate mechanisms similar to the gender action plans at the country and regional levels, which contributed to greater visibility and progress on gender. Over time, WFP has made significant progress in launching and consolidating gender mainstreaming mechanisms and mandatory analysis and in developing strategies for meeting the requirements of the gender policy.[25] At times, these tools have tended to replace or obscure protection analysis and programming.

Institutional factors

54. The primary factor affecting results was the low priority given to protection at the corporate level. Despite staff's strong acceptance of the new focus on protection, the policy did not receive corporate support sufficient for its full implementation.

55. Limited leadership and senior management support for the policy launch critically undermined necessary institutional change. In the absence of clear directives and adequate engagement of corporate leadership, protection was rarely addressed as a strategic issue

[23] The 2015 gender policy complements the 2012 protection policy and includes an objective related to protection: "Objective II: Women, men, girls and boys affected by emergencies benefit equally from nutrition and food security assistance according to their specific needs and opportunities and in safe conditions". The protection policy integrates gender considerations, notably on gender-based violence.

[24] "Summary Evaluation Report of the WFP Gender Policy (2008-2013)" (WFP/EB.1/2014/5-A).

[25] *Ibid.*

and occupied an inconsistent position on the agendas of country management teams. Little accountability and few incentives existed for engaging in protection: protection is not included systematically in performance reviews or corporate leadership training. Evaluative analysis of and learning on protection were found to be scarce.

56. Overall, organizational arrangements were inadequate for implementing the policy. The small protection team at headquarters provided adequate technical support with very limited resources but could not possibly have provided the support required to roll out the protection policy across the highly diverse and challenging operational environments in which WFP works.

57. Protection infrastructure – systems, structures, organization and capacity – at the field level was also insufficient to ensure implementation of the policy. While there has been a significant increase in personnel tasked with specific protection functions, protection focal points have limited authority to influence implementation and often bear responsibilities for several cross-cutting objectives.

58. Despite these constraints, the keen interest of WFP staff and the manifest linkages between violations of safety, dignity and integrity on the one hand and food insecurity on the other have led to important programming innovations and the adoption of good practices in several countries.[26]

Conclusions and lessons

59. The policy was formulated in a consultative manner to maximize buy-in by senior management and staff. Ambiguities in the policy and supporting guidance were initially useful for WFP in helping it to define its role in protection but led to an operational focus that did not adequately consider broader protection risks and that hampered the translation of norms into practice.

60. Significant results were achieved, but there is considerable scope to increase the policy's impact with the systematic and sustained commitment of senior management. Tensions among the definitions of protection in the policy prevented systematic attention to strategic issues, including when food is used as an instrument for asserting power. WFP has found ways to enhance protection through effective programming and good protection practices and capacities were found in several operations, including in development settings. Staff are often motivated to engage in protection practices but are uncertain about how to do so.

61. The lack of consolidated systems for collecting, analysing and using protection data has implications for the protection of beneficiaries and affected populations. At the same time, there is a much better understanding in WFP of the linkages between risks to populations, reputational risks[27] and operational risks to staff and assets.

62. Policy implementation was positively and negatively affected by various internal and external factors. The evaluation highlighted:

- lack of leadership and corporate prioritization of protection policy implementation;
- limited investment of financial and human resources in meeting protection needs in the increasing number of complex operations with high protection risks;

[26] The evaluation cites in particular Iraq, Malawi, the Niger and Nigeria, with significant engagement at the strategic level in the Democratic Republic of the Congo.

[27] Examples of reputational risks for WFP include perceptions that it is unable to meet humanitarian commitments or unable to adapt to global shifts.

- a diffuse normative framework with various policies relevant to protection to varying degrees; and
- active participation in protection clusters but limited use of partnerships in facilitating protection approaches.

63. These findings imply a need for clear commitment from senior management, re-engagement with WFP's core partners and deeper understanding of the connections between cross-cutting results on the one hand and the Integrated Road Map, the Strategic Plan (2017–2021) and Corporate Results Framework (2017–2021) on the other.

64. The growing consensus in the United Nations regarding the need for respectful and systematic upholding of human rights has placed WFP in a privileged position. WFP is undertaking a transformational change to align its results with the SDGs. WFP can now build on the significant work carried out over the past five years to reinforce the priority given to protection within the organization. Such changes will require increased engagement of leadership and resources and a robust accountability framework.

Recommendations

65. The following six recommendations derive from the evaluation findings and conclusions and were informed by an evaluation workshop in September 2017 attended by staff from throughout WFP.

66. **Recommendation 1: A new policy.** WFP should in 2018 formally affirm and in later years regularly reaffirm that protection of and accountability to affected populations are among its core responsibilities in playing its role in food security and partnerships (SDGs 2 and 17).

67. By 2019, WFP should prepare a new humanitarian protection policy. The new policy should have a single objective that encompasses all populations affected by crisis and vulnerability – in both emergency and development settings – and that reflects the IASC definition of protection. The policy should define a role for WFP in reducing the risks for populations; should clearly articulate linkages to all policies, strategies and guidelines that are relevant to risks to populations; and should include a formal framework for accountability at all organizational levels.

68. **Recommendation 2: Integration into risk management.** By 2019, the Enterprise Risk Management Division should ensure that the corporate "line of sight" clarifies the links between risks and programming for protection. A WFP-wide risk and protection framework should be developed to include both risks to populations and programming objectives. The framework should include the integration of protection issues into existing internal control frameworks and security risk management systems, and specific regional and country-level training to build skills in protection-related risk analysis among senior staff.

69. **Recommendation 3: Partnerships.** By the end of 2018, the Partnerships and Governance Department and the Policy and Programme Division should develop a formal approach to resource mobilization to support the achievement of cross-cutting protection results. The approach should include strategic engagement with donors in order to increase voluntary funding for the protection function. It should also include communication materials and guidelines for all partners, including commercial suppliers, and should cover WFP's engagement in clusters.

70. **Recommendation 4: Leadership and human resources.** 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. Senior managers should be trained and assessed

in protection analysis and negotiation skills. New measures should include the allocation of additional funding to protection and humanitarian adviser positions and the formalization of country office protection focal point positions at an appropriately senior level and functionally separate from gender focal points.

71. **Recommendation 5: Evidence base.** By the end of 2018, WFP should strengthen its analysis of contexts and protection issues by reinforcing the data systems for monitoring and evaluation and building on existing information management systems to capture protection-related information. This work will include elaboration of a "big data" pool of information on protection that combines the qualitative and quantitative information gathered; revision of corporate protection indicators; and inclusion of protection analysis in evaluation.

72. **Recommendation 6: Stakeholder dialogue.** By the end of 2019, the Policy and Programme Division should develop a new strategy for engagement with affected populations and vulnerable groups, which should be based on strengthened community feedback mechanisms.

1. Introduction

1.1. Evaluation Approach

1. **Rationale**: The Humanitarian Protection Policy (the protection policy) was approved by the World Food Programme's (WFP) Executive Board in February 2012. It marks an important step in the integration of protection into WFP decision-making and programming.

2. The current policy evaluation was commissioned by the Office of Evaluation (OEV). It documents the quality and degree of implementation of the policy. While meeting the mandatory requirement to evaluate policies within four to six years of their adoption, the evaluation is also timely in light of the roll-out of the new WFP Integrated Road Map (IRM),[28] and specifically the new *WFP Strategic Plan (SP) 2017-2021*.

3. In the new *Corporate Results Framework (CRF) 2017-2021*, WFP has stated that protection is a cross-cutting result for development and humanitarian operations. The recent World Humanitarian Summit reinforced the importance of protection.

4. **Objectives:** As per the terms of reference (ToR) (see Annex 1), the evaluation serves dual objectives of accountability and learning. It:

- Assesses the quality and results of the 2012 protection policy, including the associated guidance, approach and activities pursued to implement it, as well as the 2014 update on its implementation.[29]
- Determines the reasons why certain changes did or did not occur, to draw lessons, and derive good practices.

5. The evaluation objectives are stated under the three main questions in the ToR, and have defined the format of the evaluation report. These objectives are:

- To define the quality of WFP policy framework (Question 1)
- To define the degree to which results have been achieved since the policy adoption in 2012 until mid-2017 (Question 2)
- To identify factors within and beyond the control of WFP (Question 3).

1.2. Methodology

6. The evaluation was conducted between January and November 2017 by a three-person team: one senior protection specialist and two senior evaluation specialists, supported by two research analysts (see Annex 2 on the methodology for more detail).

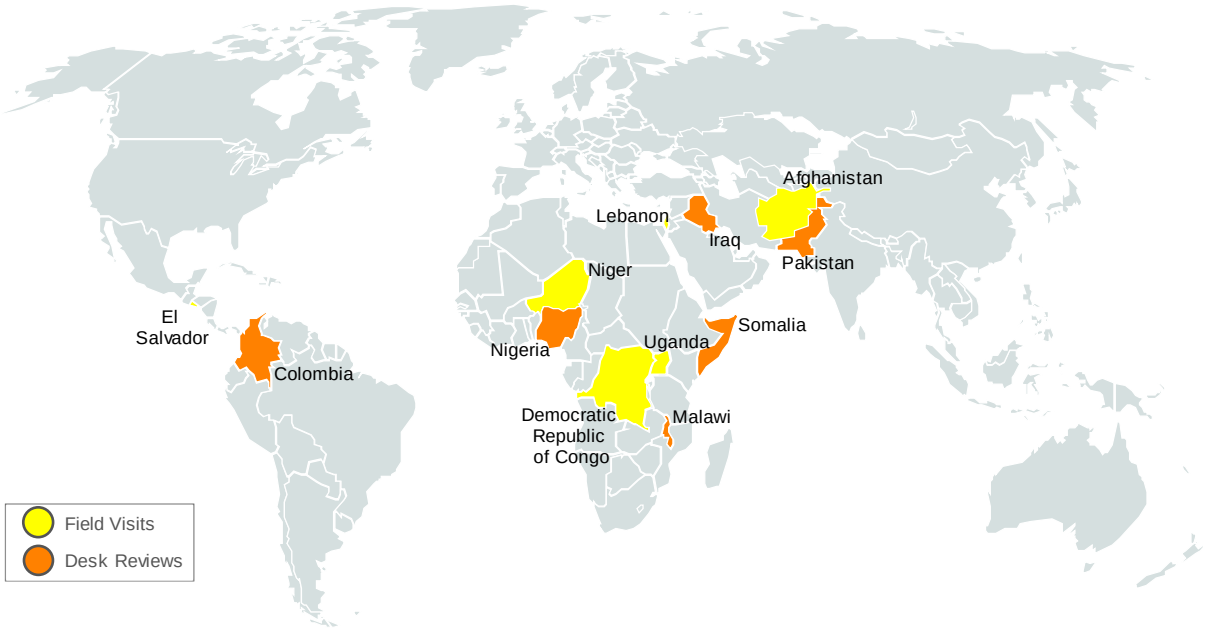
7. The evidence covered the period 2012-2017, spanning a variety of WFP operations, systems and policies (see more details on the evidence and corresponding conclusions and recommendations in Annexes 3 and 4).

8. Twelve country case studies were undertaken,[30] including six field missions to Afghanistan, the Democratic Republic of the Congo, El Salvador, Lebanon, Niger and Uganda (see Figure 1), alongside a large number of headquarters and remote interviews with key stakeholders, internal

[28] WFP Integrated Road Map encompasses four pillars: the new Strategic Plan 2017-21, Corporate Results Framework, Financial Framework Review and Policy on Country Strategy Planning.
[29] WFP. 2014. Update on implementation of the protection policy. Executive Board, 9 May 2014, WFP/EB.A/2014/5-F
[30] Six field missions (Afghanistan, Niger, Uganda, Lebanon, El Salvador, DRC) and six desk reviews (Malawi, Somalia, Nigeria, Colombia, Pakistan, Iraq).

and external to WFP (see Annex 5). Country visits were selected on the basis of regional representation and a spectrum of responses from development to emergencies (See Annex 6 for the country selection criteria).

Figure 1: Geographic coverage of the evaluation



Source: Evaluation team

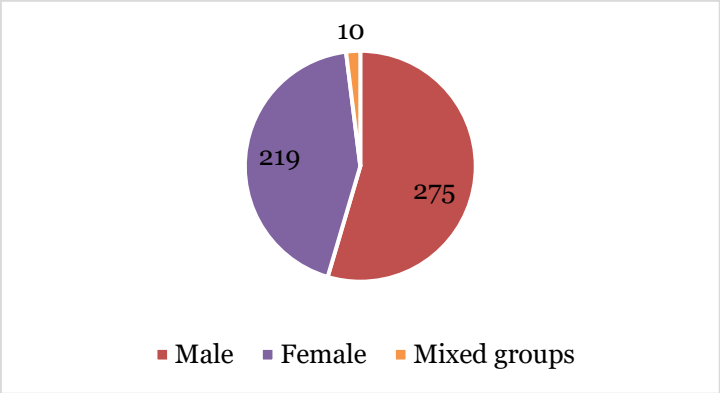
9. Two electronic surveys were conducted in June 2017, one to cooperating partners in the 12 countries selected, and one to WFP staff familiar with protection aspects. The staff survey had a response rate of 13 percent (a little above average for an online survey) and 23 percent for the partners' survey (a 10 percent response rate is most common for an online survey).[31] Because the total population of cooperating partners could not be defined, the survey is based on a non-probability sample. The responses from the partners' survey were therefore not as statistically significant as for the staff one, and were used with reservation. Some 504 confidential in-depth interviews were conducted with a broad range of stakeholders, as shown in figures 2 and 3 below.

Figure 2: Category of people consulted across the 12 country studies

Source: Evaluation team (*External stakeholders include: Protection professionals, NGO partners, other United Nations agencies, government staff, donors, etc.)

[31] Out of a universe of 316 respondents, with a completion rate of 52 percent.

Figure 3: Gender distribution of interviewees



Source: Evaluation team

10. The analytical framework combines qualitative and quantitative evidence, organised around the evaluation matrix (see Annex 7) approved in the inception phase. The assessment is articulated around an analysis of the quality of the policy. It references: comparable standards such as those developed by IASC, UNICEF and other specialized, and non-specialized agencies (see below for further references); internal coherence; and field applicability. It also takes into account the results achieved and the factors that facilitated or impeded results. For the results achieved, the evaluation referred to the theory of change[32] as a way of structuring the analysis of the changes in the affected population. The analytical approach was based on identifying recurrent patterns of performance across the different case studies, and searching for outlying aspects, which would denote an important causal factor. This was then triangulated by a review of other evaluations for those themes and countries where the evaluation could not access primary data. All inputs were gathered on the basis of informed consent, and all those providing information for this evaluation – whether beneficiaries or others – were informed about how that information was used. Inputs into an evaluation such as this are recorded only for the evaluation team's use and are not disclosed to others verbally or in evaluation reports. This level of anonymity applies not only to interviews and group interviews but also to online questionnaires.

11. The constraints faced by the evaluation were typical for evaluations of this type and scope, but are not considered to have affected the findings. The team was unable to visit i) countries with Level 3 emergencies (although two Level 3 countries were included in the desk studies), and ii) selected priority countries on account of other recent or ongoing evaluations and of pressures on the country offices in their response to current emergencies. Access was limited in some country visits, particularly Afghanistan, Niger, Democratic Republic of the Congo (DRC) and El Salvador.

12. The most significant hurdle was the lack of outcome-level data on protection and the scattered nature of this reporting. There was also difficulty in obtaining information on the functioning of the protection clusters in the country case studies. Protection in the food security, logistics and telecommunications clusters was only partially examined by this evaluation.

13. The evaluation took a utilization-focused approach, based on the principle that an evaluation should be judged on its usefulness to intended users. The evaluation approach was therefore participatory, in that findings were tested and shared at various stages of the evaluation, while protecting the openness of respondents.[33] The findings, conclusions and recommendations were discussed at WFP Headquarters, in Rome at a stakeholder workshop on 28-29 September 2017.

[32] OSZPH. 2016. Theory of Change. WFP. Rome
[33] Patton, Michael Quinn, 'Utilization-Focused Evaluation: 4th edition', Thousand Oaks, Ca, Sage Publications, 2008.

14. The Office of Evaluation launched this evaluation in parallel with an evaluation of WFP policies on humanitarian principles and access in humanitarian contexts. As a result, the following issues are not covered in this evaluation: access negotiations; partnerships other than cooperating partners; and general adherence of partners to principles.

1.3. Context

15. As pointed out in a recent multi-donor study, the past two decades have witnessed a convergence between human rights and other protective normative frameworks and development, particularly at the level of international political statements and policy commitments.[34] This is captured in milestones such as the 2007 Organization for the Economic Cooperation and Development (OECD) Development Assistance Committee's (DAC) *Action Oriented Policy Paper on Human Rights and Development*,[35] the 2010 United Nations *World Summit Outcome Document*,[36] and the commitments of the 2005 and 2011 High-Level Fora on Aid Effectiveness in Accra and Busan.[37] It is also reflected in the conclusions of the World Humanitarian Summit, which confirmed the importance of protection as one of its five core commitments.[38]

16. This convergence signals a renewed focus on the relationship between rights violations, poverty, exclusion, environmental degradation, vulnerability and armed conflict. The linkage involves a growing recognition of the intrinsic importance of human rights, as well as their instrumental relevance for improving humanitarian and development processes and outcomes. In fact, current initiatives seek greater links between humanitarian and development activities.

17. United Nations organizations, especially large specialized agencies, are increasing activities that make practical links between global and corporate policies, and guidelines and actual practice in the field.[39] This includes addressing both i) the protection challenges faced by affected populations and ii) the dynamics of operating environments that undermine the safety, integrity and dignity of those in complex, high-threat environments.[40] Interestingly, none of the agencies reviewed have sought to develop their own definitions of protection, unlike WFP (see Annex 8 for a review of good practices).

18. Large-scale, complex emergencies formed the background for the launch of the humanitarian response review commissioned by the emergency relief coordinator in 2005.[41] The review, which led to the development of the cluster coordination system and subsequent Transformative Agenda, identified "significant gaps and weaknesses in protection, particularly in agencies that did not have a protection-specific mandate and had very few staff with a protection

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[34] World Bank & OECD. 2013. *Integrating Human Rights into Development. Donor Approaches, Experiences, and Challenges*. OECD, Paris.

[35] OECD. 2007. DAC *Action Oriented Policy Paper on Human Rights and Development*. http://www.oecd.org/development/governance-development/39350774.pdf

[36] United Nations. 2010. World Summit Outcome Document. http://www.un.org/en/mdg/summit2010/pdf/mdg%20outcome%20document.pdf

[37] OECD. 2008. Third High Level Forum, Accra, Ghana. http://www.oecd.org/dac/effectiveness/theaccrahighlevelforumhlf3andtheaccraagendaforaction.htm

[38] World Humanitarian Summit. 2016. *The Grand Bargain: A Shared Commitment to Better Serve People in Need*. Istanbul, Turkey.

[39] For instance, UNICEF is currently undertaking an evaluation of its role in complex high threat environments and there is an emerging array of models that make the links between global policy and guiding principles for operations. See the OECD's fragile state principles (http://www.oecd.org/countries/afghanistan/thefragilestatesprinciplesfsps.htm) and the WHS "New Way of Working" Initiative (http://www.agendaforhumanity.org/initiatives/5358).

[40] Ockwell, Ron. 1999. Full Report of the thematic evaluation of Recurring Challenges in the Provision of Food Assistance in Complex Emergencies The Problems and Dilemmas faced by WFP and its Partners: https://www.wfp.org/sites/default/files/complexemerg-ockwell.pdf

[41] IASC. 2005. Humanitarian Response Review. https://interagencystandingcommittee.org/system/files/legacy_files/HRR.pdf

focus".[42] It noted that gaps in protection were often due to the lack of a common understanding of the meaning of the term "protection".[43]

19. Similar issues have persisted. The findings of the 2015 independent *Whole of System Review*[44] identified ongoing systemic constraints to improving protection, such as: resistance to change in the humanitarian system; geopolitical factors shaping United Nations Security Council decisions; and the instrumentalization of humanitarian action in support of political or military agendas. Other recurring themes included multiple interpretations of the formal Inter-Agency Standing Committee (IASC) protection definition, lack of strategic vision, weakness in the protection architecture, and a gap between rhetoric and reality on protection.[45]

20. Work continues in improving the normative framework. The *Centrality of Protection Statement*[46] affirms the commitment of the IASC to make protection a core element of humanitarian action. It is a strategic level approach that sets out practical steps that are further elaborated in the IASC protection policy, adopted in 2016. Both emerged after the adoption of the WFP protection policy[47] and reflect a broad understanding that the "imperative to protect lies at the heart of humanitarian action." This was paralleled by other initiatives, such as Human Rights up Front approach, led by the United Nations Secretary General.[48] There is a wide acknowledgement that food security conditions the enjoyment of rights, and that respect for human rights also contributes to food security.

1.4. The WFP Protection Policy and Its Implementation

21. Growing awareness of the role and responsibility of WFP in relation to protection in the context of food insecure populations led to the Executive Board's endorsement in 2004 of core humanitarian principles and standards that "constitute normative and moral obligations" for WFP.

22. While WFP does not have a legal mandate to engage in protection (in the sense that it is not mentioned in instruments of international law), it acknowledges that it should integrate protection considerations into its decision-making and operations. Since 2005, WFP has developed its policy tools to address protection concerns through the *WFP Humanitarian Principles Policy (2004*),[49] the *Protection Project (2005-2008)*,[50] the *2012 Protection Policy*, the 2014 update,[51] and through the *2015 WFP Gender Policy*.

23. The *WFP Strategic Plan (2008-2013)* mentions protection with greater frequency than previous strategies, and the *WFP Strategic Plan (2014-2017)* explicitly states under its second goal that WFP will provide food assistance in ways that protect the safety, dignity and integrity of the most vulnerable. It stipulates that the agency should conduct gender and protection analyses, and engage beneficiaries in project design. The *WFP Strategic Plan (2017–2021)* states that "WFP will

[42] IASC. 2011. Transformative Agenda. https://interagencystandingcommittee.org/iasc-transformative-agenda
[43] Niland N, Polastro R, Donini A, Lee, A. May 2015. *Independent Whole of System Review of Protection in the Context of Humanitarian Action.* Norwegian Refugee Council
[44] Niland N, Polastro R, Donini A, Lee, A. May 2015. *Independent Whole of System Review of Protection in the Context of Humanitarian Action*. NRC.
[45] IASC. 1999. Protection of Internally Displaced Persons, Inter Agency Standing Committee Policy Paper, pg.4 https://interagencystandingcommittee.org/system/files/legacy_files/FINALIDPPolicy.pdf
[46] IASC. 2013. The Centrality of Protection in Humanitarian Action, Statement by the IASC Principals. https://interagencystandingcommittee.org/sites/default/files/centrality_of_protection_in_humanitarian_action_statement_by_iasc_princi.pdf
[47] WFP. 2012. WFP Policy on Humanitarian Protection. WFP/EB.1/2012/5-B/Rev.1
[48] United Nations Secretary General. 2013. Human Rights up Front Initiative. https://www.un.org/sg/en/content/ban-ki-moon/human-rights-front-initiative
[49] WFP. 2004. *Humanitarian Principles Policy*. WFP/EB.A/2004/5-C
[50] WFP. 2008. *Ten Minutes to Learn about WFP's Protection Project*. Vol.1, Nr. 9
[51] WFP. 2014. *Update on Implementation of the Protection Policy. Executive Board*, 9 May 2014, WFP/EB.A/2014/5-F

work to integrate humanitarian protection concerns and accountability to affected populations in all its activities."[52]

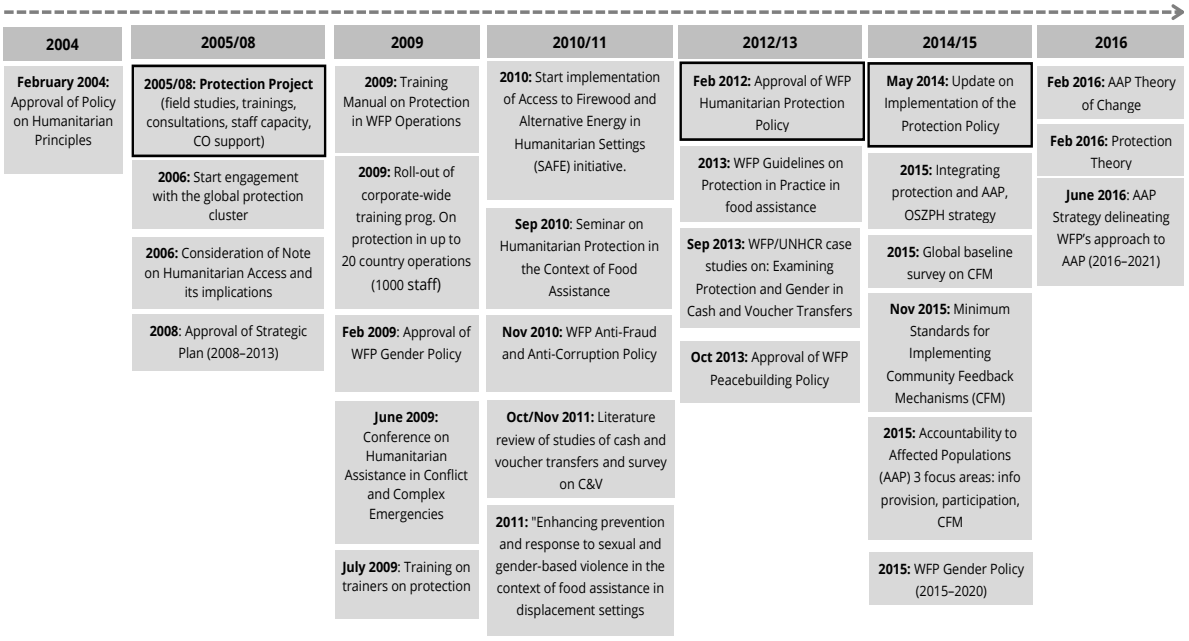
24. The WFP 2016 Integrated Road Map (IRM), including the *WFP Strategic Plan (2017-2021),* represents an institutional commitment to corporate change, designed to facilitate the organization's contribution to the 2030 Agenda for Sustainable Development. It changes the way WFP works by introducing a new country strategic planning process and programmatic framework, as well as a financial management framework that links resources with results. It includes a focus on the realization of the 17 Sustainable Development Goals (SDGs).[53] The associated strategic planning documentation makes reference to the protection policy and to related policies[54] and explains that the new framework should be implemented in adherence with core humanitarian principles and protection values. The corporate results framework created new opportunities for protection and protection was further confirmed therein as a cross-cutting objective (under SDG2, objective C2 on safety, dignity and integrity).

25. WFP Executive Board approved the WFP protection policy in February 2012. This marked a milestone in an on-going process to enhance WFP engagement in protection. Within the United Nations system, WFP was one of the first non-protection specialist humanitarian entities to adopt a policy on protection. The policy was the product, in part, of a "growing consciousness within WFP" of the significance of protection "and its link to food assistance"[55] coupled with an acknowledgement that the calls of donors and others to engage in protection had "become central to discussions surrounding humanitarian agencies' roles and responsibilities."[56] It is acknowledged that underlying causes of hunger include those resulting from protection risks: violence, deprivation, intimidation, discrimination. These risks threaten the household's food security or lead it to adopt negative coping strategies, with direct effects on its food security and nutritional state.[57]

26. The protection policy development was accompanied or complemented by related policies (gender in particular),[58] strategies and institutional initiatives, which had some thematic overlaps that contributed to each other's objectives. The timeline in Figure 4 reflects the main events related to the protection policy.

[52] WFP. 2017. *WFP Strategic Plan (2017-2021)*, Paragraph 47.
[53] The IRM includes four components, the *WFP Strategic Plan (2017-2021)*, a policy on CSPs, the financial framework review, and the corporate results framework (CRF). WFP is aligned with SDG #2 concerned with ending hunger and achieving food security and improved nutrition coupled with sustainable agriculture and SDG #17 concerned with revitalizing partnerships for sustainable development. See WFP. June 2017. Update on the Integrated Road Map http://documents.wfp.org/stellent/groups/public/documents/eb/wfp291538.pdf
[54] Section III, Positioning WFP in Relation to the 2030 Agenda for Sustainable Development.
[55] Interview with WFP staff member. June 2017
[56] Interview with WFP staff member. June 2017
[57] Crawford, N., Pattugalan, G. 2013. Protection in Practice: Food Assistance with Safety and Dignity. WFP
[58] WFP. 2015. Evaluation of WFP's Gender Policy (2015-2020). Rome.

Figure 4: Key protection milestones



Source: Evaluation team

27. The protection policy provides a conceptual framework to support the rationale for the integration of protection into the work of WFP. The policy encompasses: (1) a definition of protection that draws on, but is narrower than the IASC definition; (2) a global policy discourse that serves as a basis for engagement in protection activities; and (3) WFP internal reflections on protection and a description of the policy process.

28. The IASC definition of protection that is widely used by the humanitarian community, indicates that protection encompasses "all activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and spirit of the relevant bodies of law, namely human rights law, international humanitarian law and refugee law." WFP has proposed a specific definition of its own: "designing and carrying out food and livelihood assistance activities that do not increase the protection risks faced by the crisis-affected populations receiving assistance. Rather, food assistance should contribute to the safety, dignity and integrity of vulnerable people".

29. The policy document sets out six areas of implementation for WFP that are intended, over time, to achieve the policy's overall goal of enhancing protection in the context of WFP decision-making and programming. In the absence of an explicit objective and theory of change,[59] the six policy directions (see table 1) have become the main reference used to articulate normative and strategic implementation considerations.[60]

[59] A graphical representation of the theory of change was produced by the operations and transitions unit (OSZPH) in 2016 as part of the process of generating corporate indicators. This policy logic was not adopted as an update nor in WFP guidance, and has an informal status in the material subordinated to the policy.

[60] They are referenced in the implementation plan (2012), in the policy update (2014) and strategic documents from the OSZPH.

Table 3: Presentation of main protection policy implementation

POLICY DIRECTIONS					
1 Investing in institutional capacity for context and risk analysis	2 Incorporating protection into programme tools	3 Integrating protection into programme design and implementation	4 Developing staff capacity	5 Establishing informed and accountable partnerships	6 Managing protection-related information
1. WFP should enhance capacity for consistent, thorough context analysis 2. WFP should provide its insights into the power relations and dynamics for the protection of local populations and for gender relations 3. WFP should Understand the various risks that are faced when feeding vulnerable and marginalized populations and contribute to their protection	1. WFP should identify linkages between food insecurity and the protection risks, vulnerabilities and coping strategies and capacities of affected populations 2. WFP should allow more systematic tracking and measurement of protection risks 3. WFP should inform programme design and select food assistance modalities that are safe and culturally appropriate	1. WFP programmes should take into consideration the safety, dignity and respect for the rights of beneficiaries 2. WFP programmes should contribute to the overall protection outcomes for the people WFP assists 3.WFP should implement strategies to improve AAP that will be beneficial for programme design.	1. Staff should be trained in context analysis, assessing risk, and managing and processing protection-related information 2. Staff and partners should be aware and sensitive of people's rights and the obligation of states to provide, respect and protect these rights, as well as to the UN Code of Conduct and the humanitarian principles of WFP	1. WFP should build the protection knowledge and competencies of cooperating partners and ensure that all its partners are sensitized to the principles and norms that underpin the protection of beneficiary communities. 2. WFP should ensure that protection is mainstreamed into activities of the global food security, logistics and emergency telecommunication clusters.	1. WFP should enhance its information management mechanisms to ensure that sensitive data are handled securely, in accordance with clear principles and procedures, to avoid putting beneficiaries at risk 2. WFP should have clear policies and procedures for guiding staff who become aware of or witness abuses and violations and for ensuring the confidentiality of related information.

Source: Reconstructed by the evaluation team

30. A number of other policies operate in the same general area of preventing risks and encouraging opportunities for beneficiaries, and preventing harmful practices for wider populations in the environment of WFP operations. It is worth mentioning here the peace-building policy and the "Do No Harm" training manual, the gender policy, the protection from sexual exploitation and abuse (PSEA) and the accountability to affected populations (AAP) guidance. It can also be seen to relate to the emergency and transition framework's "Right Way",[61] which states that the assistance should be context-sensitive.

[61] OSZPH's "Right Way" framework is one of the "5 Rs" encompassed in a framework for emergency programming. "The Right Way" explicitly integrates protection and AAP considerations.

31. The policy attempts to define WFP engagement as a non-protection specialized organization. It refers to international humanitarian law and United Nations conventions. The policy refers to humanitarian crisis settings, but does not exclude other areas of WFP work, while a vast range of stakeholders is considered relevant to the policy's implementation. (For more information, see the stakeholder map in Annex 9, which outlines a significant number of actors within the global work of WFP, illustrating its cross-cutting nature)

2. Evaluation Findings

2.1. 2.1. Quality of the Policy

2.1.1. Evidence-Base, Conceptual Framework, Objectives

Finding 1: The policy embraced humanitarian and development action. The policy differentiated in terms of responsibility between WFP "beneficiaries" – actual recipients of food assistance – and those who were crisis-affected or simply found themselves in a position of vulnerability. This influenced how the policy was interpreted and applied in practice and created a form of tension between the different interpretations. The corporate indicators failed to capture the full scope of protection.

32. The WFP protection policy was the product of a growing recognition within WFP of the significance of protection and its link to food assistance. This was coupled with an acknowledgement that the calls of donors and others to engage in protection had "become central to discussions surrounding humanitarian agencies' roles and responsibilities."[62] By applying the evaluation questions as principal criteria of quality, coupled with the Office of Evaluation's "top ten lessons" concerning policy evaluations, it is possible to see how this created a WFP-specific platform for protection.[63]

33. The development of the protection policy benefitted from the WFP protection project (2005-2008), an internal initiative that generated an organizational change process. During the project, WFP carried out case studies for settings characterized by disasters and armed conflict.[64] In addition, WFP provided training on protection to staff and partners and developed a dedicated concept paper on gender and protection to support a series of in-house consultations that were held with various country offices.[65] Considerable attention was given to protection challenges encountered in disaster and armed conflict settings, from a humanitarian perspective, with specific reference to the situation of women and girls. Issues related to gender based violence (GBV) and HIV/AIDs were of particular concern.[66]

34. Corporate protection-related indicators refer only to the proportion of assisted people who are adequately informed about assistance, the proportion of project activities with feedback mechanisms, and the proportion of targeted people "accessing assistance without protection challenges."[67] In many interviews, WFP staff highlighted that these indicators were limited and protection was narrowly defined.

35. Between 2014 and 2015, project reporting (country projects, development projects, protracted relief and recovery operations, emergency operations/immediate response emergency operations) increasingly reported on performance along the two protection corporate indicators.

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[62] Crawford, Nicholas, Pattugalan, Gina. 2013. *Protection in Practice: Food Assistance with Safety and Dignity*. WFP.
[63] WFP. 2017. *Evaluation Top Ten Lessons on Good Policy Quality*.
[64] The case study countries included Colombia, the DRC, El Salvador, Honduras, Laos, Liberia, Philippines, Sri Lanka and Uganda.
[65] Deshpande, Chitra, November 2005. *Protection and Gender Issues in Conflict and Post-Conflict Situations*, WFP Policy Strategy and Programme Support Division, Rome.
[66] Michels, An. July 2006. WFP Liberia: *Gender, Protection and HIV/AIDS in the Context of WFP Operations*.
Michels, An. Pattugalan, Gina. Sept-Oct 2006. *Gender, Protection and HIV/AIDS in the Context of WFP Uganda Operations*
Thoulouzan, Julie. Rana, Raj and Michels, An, Independent Consultants. March-April 2006. *WFP in the Democratic Republic of Congo: Gender and Protection in the Context of WFP Operations*.
Bizzari, M., Flentgue, J., Nivet, J., Wanmali, S. and Eguren, E, Independent Consultant. April-May 2006. *Gender-Based Violence in Colombia: Field Study Report*, WFP.
[67] WFP. 2016. Corporate Results Framework.

This was also accompanied by better apparent performance, with a greater proportion of projects meeting their targets in 2015 compared to 2014. However, the percentage of projects meeting the targets set for the indicators seemed to have dropped in 2015, compared to 2014.

Table 4: Progress against WFP corporate protection cross-cutting indicators (2014-2015)

Indicator	Projects reporting performance data		Projects meeting target (=>88,9%)		Percentage of projects meeting targets	
	2014	2015	2014	2015	2014	2015
Proportion of assisted people who do not experience **safety problems** travelling to/from and at WFP programme sites	57	80	57	78	100%	98%
Proportion of assisted people (men) who do not experience **safety problems** travelling to/from and at WFP programme sites	67	72	67	71	100%	99%
Proportion of assisted people (women) who do not experience **safety problems** travelling to/from and at WFP programme sites	66	72	63	71	95%	99%
Proportion of assisted people **informed** about the programme	49	77	43	51	88%	66%
Proportion of assisted people (men) **informed** about the programme	65	76	50	52	77%	68%
Proportion of assisted people (women) **informed** about the programme	66	76	50	53	76%	70%

Source: Evaluation team based on WFP Dacota and COMET 2014-2015

36. This reporting reflects contrasting trends that beg deeper analysis. The figures also need to be contextualized. Because of their narrow scope, corporate indicators are not necessarily informing the programme about specific protection issues. For instance, the number of assisted people accessing assistance without protection challenges does not give information about what protection challenges may have been encountered by the rest of the crisis-affected people. It cannot therefore be used to guide corrective measures. Country offices are not expected to go beyond corporate indicators, however, they are encouraged to take the initiative of "collecting data on protection risks related to WFP programmes as part of their monitoring routine".[68] Examples of risk-tracking do exist, as observed in Iraq and Malawi.[69] One innovative approach that could be replicated in contexts where affected population tensions exist is the development of a "tension perception indicator" as used by WFP in Ecuador.[70]

Extent to which there is a tension between different understandings of protection and its overall objective

37. The protection policy does not articulate a vision, as such, or spell out a contextual analysis, but it clearly drew on international discourse, such as: the development of United Nations agencies' code of conduct; the SPHERE handbook in 2000; United Nations reports and resolutions between 2001 until the launch of the policy; the establishment of the protection cluster in 2005, amongst others; and on the evidence that emerged from the protection project activities. These

[68] OSZPH. 2016. Protection and AAP in WFP, key achievements. WFP
[69] PDM documents in Malawi, protection analyses and M&E in Iraq (including in e-mail form).
[70] Ibid.

activities contributed to in-house reflection, and played a key role in the initiation and development of the protection policy.[71]

38. The inclusionary and participatory processes allowed for the accumulation of insights from a broad cross-section of WFP staff and of non-WFP personnel.[72] This contributed to a series of guidance documents that are readily recognizable by staff as broadly relevant to their work.

39. The protection policy addresses a number of concepts to address the food needs of crisis-affected populations, including human rights, with a focus on minimizing risks and maximizing safety, integrity and dignity in the context of assistance.

40. Population groups that are food insecure but do not receive assistance may, for example, be those who are besieged, and/or living in remote, or hard-to-reach areas. In all such circumstances, the policy, in line with the IASC definition, would indicate that these are protection responsibilities relevant to WFP.

41. Some of this evaluation's respondents[73] noted that aspects of the WFP protection policy were kept broad, deliberately, during the formulation phase, in order to promote institutional buy-in and address concerns among some in-house stakeholders, including senior managers, especially regarding the scope and ambition of the eventual protection policy. Tensions in this connection were shaped by different perspectives on the nature and scope of WFP protection responsibilities as well as the interest of some donors and other stakeholders keen to see WFP engage, systematically, in protection programming.

42. These tensions are apparent in the text of the protection policy. Paragraph 4 indicates that, for WFP, its "chief accountability is to crisis-affected, food-insecure people". However, the preceding paragraph makes reference only to the importance of attention to the protection implications of assistance "on the safety and dignity of WFP beneficiaries". The difference, in terms of responsibility, between WFP "beneficiaries" – actual recipients of food assistance – and those who are crisis-affected or simply find themselves in a position of vulnerability, influences how the policy is interpreted and applied in practice. As the policy indicates, the definition used by WFP reflects internal compromises about what the concept implies.[74] The possibility of a strong, assistance-focused definition reassured those concerned that protection could affect relations with governments and some key stakeholders, constraining policy dialogue or access to affected populations. As such, the duality facilitated dissemination, but allowed for the persistence of different interpretations.

Extent to which the protection policy has clear objectives, outputs, outcomes and indicators to verify results

43. The three concentric circles of the policy provide a framework that demarcates WFP protection responsibilities. The outer circle is concerned with the overall operating environment, where issues are directly or indirectly related to food insecurity, as well as other issues of humanitarian concern, and require action by WFP and others. The middle circle deals with

[71] WFP. Oct 2011. WFP and Humanitarian Protection, Informal Consultation on the Protection Policy. http://documents.wfp.org/stellent/groups/public/documents/resources/wfp241965.pdf

[72] *Idem*

[73] Respondents included former senior WFP staff familiar with the protection policy formulation process.

[74] In the absence of a definition, protection training carried out by WFP before 2012 formulated a "base" that was somehow reflected in the policy but not as a definition. The protection focus of the training workshops in 2012 is "in the face of violations of rights, such as through violence, coercion or deprivation, WFP's actions, independently or in coordination with others, can improve the safety of people, preserve their dignity and integrity, and empower them by supporting their existing capacities to protect themselves."

protection issues "that contribute to the larger context of food insecurity". It requires that WFP "provides meaningful support to hungry people and that its interventions address the underlying causes of hunger." The inner circle focuses on "protection concerns within WFP delivery activities" and has, to a large extent, made up the bulk of WFP attention to protection matters. The policy states that WFP needs to give systematic attention to the full range of its protection responsibilities including, in particular, those set out in the middle and outer concentric circles.[75]

44. Supporting documentation included an "implementation approach" that summarized key features of the protection policy and set out a phased approach for the policy's implementation (July 2012-June 2016).[76] However, specific intermediary steps that could have been aligned with the staged implementation plan were not explicitly outlined in the policy. The policy lacks a clear framework of responsibility and accountability, including in relation to the role of senior managers. The document limits itself to capacity-development activities to serve what it calls an objective of 'sustained engagement'. This is echoed in the 2014 policy update.

45. The policy sets out six implementation directions. These provide the main frame of reference to monitor progress for the policy. Because the policy directions lacked clearly articulated steps and objectives, efforts focused on the internal environment for protection.

46. The policy was not initially supported by a theory of change to articulate expected results. A theory of change was developed in 2016 for internal purposes in relation to the creation of the corporate results framework and the creation of corporate reporting, four years after the policy was approved. It was never formally endorsed to guide protection activities. It did not support implementation, as the first stages were lacking in linkages to the established priorities implied by the policy. The *WFP Strategic Results Framework (2014-2017),* approved after the adoption of the protection policy, integrates gender and accountability to affected populations, as well as protection, as cross-cutting results. Relevant indicators refer to the proportion of assisted people who do not experience safety problems at distribution sites, and are well informed about the assistance programme, including where to make a complaint.[77]

47. The inclusion of protection as a cross-cutting objective in the corporate results framework enshrines it in a key position. Protection has now reached a point where it can become a way of doing assistance, rather than a core consideration for the well-being of affected populations, but to do so it requires a performance-related anchor. As it stands, the policy remains quite isolated. For example, there is no reference to other relevant Sustainable Development Goals in the corporate results framework, in particular SDG 16, which concerns inclusive societies and access to justice.

48. During this evaluation, various WFP staff referred to difficulties in translating the protection policy in diverse contexts. There was uncertainty as to the status and practical aspects. This was illustrated in the staff survey, which yielded answers such as: "in [our country], the crisis has different aspects, and due to circumstances, protection is not applicable at all times and in all places, therefore, results are not clear in terms of accomplishing goals and objectives." This points to the need for a dedicated institutional commitment to addressing protection concerns that exist in all crisis environments, including in non-disaster contexts. The policy's implementation is very clear and applicable on what to do in protracted crises, but less clear on basic standards in sudden onset crises or complex emergencies.

49. Additionally, the corporate protection indicators do not cover the full range of responsibilities included in the protection policy. Instead, they focus on assisted populations with

[75] WFP. 2012. *Humanitarian Protection Policy*, page 19-20.
[76] *WFP Humanitarian Protection Policy, Implementation Approach,* 5 April 2012.
[77] *WFP Strategic Results Framework (2014-2019)*, WFP/EB.2/2013/4-B/Rev.1

reference, for example, to the proportion of "assisted people informed about the programme" or the "proportion of targeted people accessing assistance without protection challenges".

50. While country offices were encouraged to provide additional reporting on protection,[78] none have yet done so,[79] and the only reporting presented in the annual performance reports reflects the corporate indicators. The corporate indicators have evolved through adjustments since their introduction in 2012, but, due to the fact that they have to refer to quantitative evidence, they are bound to reflect a very limited part of the reality of protection for affected populations.

2.1.2. Coherence with Normative Frameworks

Extent to which the protection policy is conceptually articulated, and coherent with thinking in development and humanitarian assistance

Finding 2: The policy was in line with guidance and policies in WFP reviewed by the evaluation, and was coherent with emerging policies and guidelines from other agencies. It encouraged related strategies such as accountability to affected populations and the protection of personal data.

51. The growth of protection practice is aligned with progress within the broader United Nations system, dealing more explicitly with protection and human rights, expressed, for example, under the "Human Rights up Front" initiative[80] and the movement toward an IASC protection policy, which was adopted in 2016.

52. The WFP protection policy is coherent with the formal protection policies of non-specialist protection humanitarian actors (United Nations and non-governmental organizations),[81] particularly in reference to issues such as "Do No Harm", protection mainstreaming, gender sensitivity, and gender based violence (see Box 1).

[78] Interview with policy personnel at headquarters.
[79] South Sudan has included additional protection-related questions and they were published in the annual report for South Sudan.
[80] https://www.un.org/sg/en/content/ban-ki-moon/human-rights-front-initiative
[81] The policies of a number of organizations were reviewed, but the organizations asked the evaluation team members not to quote them. The policies of DanChurchAid, UNICEF and Sida were also analysed, as presented in the Annex on Best Practices.

53. However, differences in messaging and tone come to light in examining a cross-section of United Nations and NGO humanitarian protection policies. These policies include, for example, the presence of a clearly stated rationale, purpose and scope. They also contain explicit reference to responsibilities concerning the rights of affected persons, and the obligations of parties engaged in armed conflicts, as well as, in development, the role of duty bearers.[82] The policies spell out what protection means from a strategic, operational and advocacy perspective and stress the necessity of a context analysis that determines the severity and nature of protection needs. Some policies have been updated and make specific reference to the centrality of protection agenda as well as the importance of understanding community-based protection initiatives. None of the policies reviewed included an agency-specific definition. Many policies underline the importance of joint, inter-agency efforts in complex emergencies, of interventions that are complementary to that of other actors, and being proactive including in terms of advocacy coupled with the need for coherent programming.

Box 1. Gender and protection

The gender policy shifted in 2009 from a woman-centred approach to "one with a wider view on differences in the lives of women and men, and girls and boys." The goal of the current policy (2015-2020) is gender equality in nutrition and food security. The protection policy is consequently in need of an update to reflect this subsequent shift in gender and notes, for example that "gender issues and the protection of women are of particular concern." The evaluation field visits found that, frequently, references to gender are equated with the protection of women. There is correspondingly less focus on the protection needs of men, boys and children, who may be subjected to any form of violence, coercion or deprivation.

54. Most protection policies tend to have a humanitarian rather than a development focus. For WFP, protection is an issue, due to deep and widespread vulnerability. Principle 5 of the WFP protection policy reflects a slight bias towards conflicts, emergencies and disasters, but the document more broadly reflects the relevance of protection in non-emergency contexts.

Degree to which protection guidance (including training material) is reflected in allied guidance

55. WFP has adopted a set of policies and guidance materials on priorities that relate to how it defines assistance quality.[83] There is, however, no hierarchy between these policies, which are expected to be known and applied by staff.

56. Important issues were raised by staff during the evaluation when thinking through the implications of protection for programming. These included: protection-related advocacy, referrals, gender, risks around the conditions at delivery points, PSEA and gender based violence. Yet, alongside this recognition of the links between protection and other activities, WFP staff regularly stated that this became challenging within different contexts.

[82] Some agencies underline that protection is central to their mission noting that protection and assistance are inseparable and intrinsically linked in their overall approach to humanitarian need. ICRC, for example, notes that protection work cannot be conceived and carried out in isolation so that it "contributes to a favourable environment along with other actors."
IRRCICRC. 2008. *ICRC Protection Policy*. Volume 90, Number 871.
https://www.icrc.org/eng/assets/files/other/irrc-871-icrc-protection-policy.pdf

[83] This includes: *WFP's Role in Peacebuilding in Transition Settings*; *Environmental Policy*; *Joint Strategy on Refugee Self-Reliance in Food Security and Nutrition in Protracted Crises*. There will soon be an updated *Emergency Preparedness Policy*, and a policy update on *Food Assistance to Urban Populations*.

57. In the absence of a plan that clearly articulates the measures needed to address protection issues related to food insecurity, WFP staff interpret and determine the significance of diverse WFP policies and the most appropriate means to implement them.

58. Both the protection and gender policies provide clear guidance on the issue of gender based violence, although the latter is more explicit in noting that the problem is widespread and under-reported. The protection policy highlights the efforts of WFP and others to pre-empt gender based violence incidents in the context of Safe Access to Firewood and Alternative Energy (SAFE) in humanitarian settings.[84]

59. During the evaluation, field staff often referred to gender based violence as the most significant protection concern (see Box 1). The electronic staff survey clearly indicated that WFP staff considered the gender policy more important than the protection policy in terms of their efforts to enhance protection.[85]

60. During evaluation interviews, the majority of staff showed an ability to relate the protection policy to key concepts, in particular to gender equity, to sexual gender based violence (SGBV), to "Do No Harm" and to PSEA, although many were not directly familiar with the policy and had, for example, a poor understanding of what constitutes gender based violence.

61. The evaluation found that there was a broad alignment between the protection policy and WFP adoption of the United Nation's Zero Tolerance policy, concerning its personnel and efforts to ensure protection from PSEA. However, the evaluation did not find any evidence of reported incidents by WFP since 2011. Since then, a growing number of country offices has established beneficiary feedback mechanisms.[86] This is in line with an institutional acknowledgement of an obligation on the part of WFP to engage with communities "in the processes and decisions that affect them."[87]

Extent to which emerging risks and opportunities for protection are translated into guidance

Finding 3: The "centrality of assistance" approach led to guidance that focused largely on the way WFP delivers food assistance. It provided limited guidance and encouragement on the protection implications of practices that deliberately undermined food security.

62. The WFP-specific definition does not take account of situations where food insecurity is the outcome of practices that use hunger as an instrument of power. There is ambiguity in the policy concerning both WFP protection responsibilities for "crisis-affected or food insecure" populations and its focus on beneficiaries. This ambiguity can be understood, in part, as an effort to combine issues related to (a) the distribution of assistance to those selected to receive help, and (b) the

[84] WFP. 2012. Handbook on SAFE.
[85] 80 percent of WFP survey respondents indicated that the gender policy is more significant than protection in relation to GBV concerns.
[86] WFP Beneficiary Feedback Mechanism: Strengthening Accountability in Food Assistance Activities
https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/wfp_sil_beneficiary_feedback_mechanism_factsheet_jan_16.pdf
WFP/OSZPH, Global Complaints and Feedback Mechanisms (CFM) Survey, 2015; 48 out of 73 countries – 66% - reported having a CFM
[87] WFP. 2016. *Integrating Protection and AAP, Emergencies and Transitions Unit OSZPH Strategy, 2015-2016*

conditions, including disregard of international humanitarian and human rights standards, that give rise to, or foster, food insecurity and, by extension, unacceptable levels of hunger.

63. The inherent tensions between the broad IASC and the "centrality of assistance" approach have a direct relationship with the policy's development. The WFP "practical" definition of protection made the implementation of the policy more feasible from this angle, shifting the balance of efforts between protection and other objectives.[88]

64. The "centrality of assistance" approach effectively refers to not exposing to harm the people being assisted. This approach led to a wealth of guidance to improve the way WFP delivers food assistance at distribution points.[89] This includes, for example, the elaboration of a *Guide on Personal Data Protection*, which refers specifically to beneficiary data. While positive, there is a weaker focus in WFP on how to address the protection implications of policies and practices that deliberately undermine food security.

Box 2. Strategic engagement

What makes El Salvador a very difficult operational setting is the fact that it is characterized as a 'non-conventional' situation, containing an invisible conflict around criminal violence, not fully recognized by the Government. Protection from organized crime remains a major concern. There is widespread recognition in WFP operations that the effective implementation of protection measures there is due more to the experience and needs identified by the staff on the ground, rather than to the implementation of capacity building processes, provision of tools, and monitoring promoted by WFP as an institution. Thanks to the involvement of affected populations in food assistance for assets interventions for community activities (waste collection, gardening), there is a strong sense of community and dignity, which contributes to protection.

65. Thus, while senior managers interviewed noted that, operationally, WFP could not play a role in addressing protection concerns that were not connected to food insecurity, many contemporary situations of humanitarian concern illustrated the possibility of WFP engagement in strategic level issues (see Box 2), included those related to protection, that directly undermined food security. In addition, the significant field presence of WFP meant that it was often uniquely placed to observe and understand patterns of harm of concern to the organization and to the wider humanitarian community. Regardless of whether or not protection problems witnessed by WFP relate to food insecurity, the policy states that WFP should, where appropriate, refer such cases to the appropriate actors, and use its influence with governments, donors and others, including agencies that have protection-specific responsibilities and are IASC partners, to advocate for a stronger and more effective protection response. In many instances, the wording of the policy remains vague[90] and leaves open to individuals the interpretation of whether the WFP protection policy means reducing threats and vulnerabilities or focusing on assistance programming. Whereas WFP makes a distinction between "vulnerable people", namely crisis-affected or food insecure people who are assessed to have specific needs, and "beneficiaries",[91] namely those identified or selected to receive material assistance, the dual interpretation has contributed to the tendency to focus primarily on those receiving food assistance.

[88] Crawford, N. & Pattugalan, G. 2013. *Protection in Practice: Food Assistance with Safety and Dignity*. WFP.

[89] "Safety: 1) Violence at project sites 2) Risk of injury at project sites 3) Theft of food assistance 4) Social tension due to inclusion/exclusion" WFP training material. It may be worth mentioning here that this understanding is quite different from definitions of health and safety, and would best be reflected as beneficiary security. The evaluation will use, however, the WFP terminology.

[90] For example, the annual performance report summarises protection as follows: all programmes strive to ensure that food assistance is delivered and used in safe, accountable and dignified conditions. Annual Performance Report 2016.

[91] "WFP has a responsibility to ensure that its programmes do not expose to harm the people they are assisting, but rather contribute to beneficiaries' safety, dignity and integrity." Compendium of policies relating to the strategic plan.

66. The policy's fundamental principle implies a broader objective through which programming would potentially serve as an instrument of protection: "food assistance activities will be based on context and risk analysis, including an understanding of how protection gaps contribute to food insecurity and hunger, and vice versa, and how WFP's interventions can help close these gaps."[92] The WFP definition of protection has been understood differently depending on the stakeholders and audiences. While retaining reference to core elements, namely safety, dignity and integrity, since 2012, the WFP definition of protection has been quoted differently by the Executive Board,[93] in the gender policy,[94] guidelines,[95] and various corporate reports,[96] and by OSZPH.[97] The 2009 *Protection Training Manual* uses the IASC definition of protection and draws on the findings of the protection project.[98]

67. However, the September 2016 *Protection Guidance Manual* refers only to the protection risks faced by those actually receiving food assistance.[99] The guidance manual does not refer to the protection implications of WFP inaction at the strategic level, including in terms of advocacy.

2.1.3 Good Practice and Relevance

Finding 4: WFP signalled an important step, in concert with others, to formalize its responsibilities with regard to protection. The policy was relevant and appropriate given the climate at the time it was formulated, although staff still found it hard to operationalize.

68. The adoption of the protection policy in 2012 was an important milestone that signalled to the organization, its partners, and the wider humanitarian arena, that WFP was committed to taking specific steps to give effect to its protection responsibilities, both as a large humanitarian agency with significant leverage in terms of food security, and as a partner in the IASC humanitarian system (See Box 3). The formalization of WFP action on protection also legitimized different pre-policy protection initiatives and the efforts of individual staff and country offices already engaged in steps to enhance protection. Thus, the field research and in-house reflections that contributed to the formulation of the protection policy and its adoption by the Executive Board represented good practice.[100]

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[92] Humanitarian Protection Policy, page 6

[93] "WFP has a responsibility to ensure that its programmes do not expose to harm the people they are assisting, but rather contribute to beneficiaries' safety, dignity and integrity." Compendium of policies WFP/EB.1/2017/4-D

[94]This gender policy complements the *WFP Policy on Humanitarian Protection* and defines protection as ensuring that food and livelihood assistance does not increase the protection risks of the people receiving it, but rather contributes to their safety, dignity and integrity. Gender equality and women's empowerment are central to this definition.

[95] The WFP handbook on SAFE indicates that "The 2012 protection policy calls for food and livelihood assistance to contribute to the safety, dignity and integrity of those assisted by WFP".
Former protection guidelines in 2013: "protection means carrying out food-assistance activities in ways that contribute to the safety, dignity and integrity of people in the communities receiving that assistance."

[96] Protection and accountability to affected populations are core principles for WFP. All programmes strive to ensure that food assistance is delivered and used in safe, accountable and dignified conditions. Annual performance report 2016

[97] OZPSZH Integrating protection and AAP strategy. WFP "defines its role in protection as ensuring that crisis-affected people
are not exposed to further harm as a consequence of its programmes and that its food assistance rather contributes to t he protection of people it assists." Strategy page 1

[98] The *Protection Training Manual* is a detailed pedagogical tool focussed on the development of the core skills necessary for context, protection analysis and protective programming.

[99] In common with the training manual, the guidance manual covers a broad range of issues such as legal and policy frameworks, protection analysis including in the context of VAM, and use of results, transfer modalities, protection incidents and referral mechanisms, protection advocacy and partnerships.

[100] As historical background, an evaluation report (2004) of WFP West Africa Coastal Regional PRRO concluded that it looked at its operations through a "protection lens"; a study (2004), in four West African countries noted that protection "is not a new idea or a novel invention" and found that the 2002 sexual exploitation and abuse scandal in West Africa led WFP "to

69. Given the overall goal and purpose of the policy, WFP is in a position to take advantage of opportunities to safeguard lives from threats that undermine safety and survival options. This ranges from working to avoid or undo the manipulation of food assistance, to investing in tools designed to safeguard confidential information in registration. Further opportunities to safeguard lives include targeting exercises and developing the necessary expertise to identify and address the protection dimension of monetary resources as a means of assistance.

70. The guidance associated with the protection policy is seen by many staff and some partners as difficult to operationalize. It includes a set of relatively lengthy documents covering a large number of important considerations, providing different frameworks and approaches to an issue that some find complex. The policy itself is, effectively, a combination of a policy position and an outline for an action plan, supported by subsequent updates, implementation plans and manuals.

2.2. 2.2. Policy Results

2.2.1 Implementation along the Six Policy Directions

Finding 5: WFP invested in diverse efforts to strengthen its engagement in protection. This included boosting its staff capacity through staff training and recruitment of regional humanitarian advisers, integrating indicators in its corporate results framework, and the development of guidance on protection, accountability to affected populations, gender based violence, and data protection. WFP trained personnel showed considerable interest in understanding and thinking through protection risks and opportunities.

Policy Direction (PD) 1. Investing in Capacity for Context and Risk Analysis

Finding 6: Although there was a system in place for context analysis, with clear guidance on protection analysis in the protection manual and trainings, this has not yet carried over into systematic contextual analysis. Some tools have been successfully adapted to allow for protection analysis.

focus on activities designed with specific protection objectives in order to prevent further harm." The same study found that "WFP's advocacy initiatives had been few and far between" and that WFP staff lacked knowledge about the meaning of protection. One of the conclusions of the study was that WFP was in a position of responsibility to enhance protection including, for example, in terms of its registration of IDPs and that the lack of clear guidance on the role of WFP "hindered its engagement" in protection matters.

Liam Mahony undertook research (2005) in Sudan where he concluded that the WFP-IOM database registration "had considerable potential for addressing protection needs" but in the absence of clarity and agreement on means to secure confidential information on IDPs, problems arose leading Mahony to recommend the development of data systems that safeguarded "sensitive information while making other data available for protection measures."

Crawshaw, Bruce et al (2004) Full report of the evaluation of the WFP West Africa Coastal Regional PRRO, Ref OEDE/2004/6 http://documents.wfp.org/stellent/groups/public/documents/reports/wfp065522.pdf

Martin, Maria Clara. 2004. Review of Protection Issues in West Africa Coastal Countries, Ivory Coast, Sierra Leone, Guinea and Liberia. Martin, M. C. 2004. Review of Protection Issues in West Africa Coastal Countries, Ivory Coast, Sierra Leone, Guinea and Liberia. WFP.

Mahony, Liam. 2004. "Food, political power and protection in Darfur" in Protection in Practice, WFP, 2013 http://reliefweb.int/sites/reliefweb.int/files/resources/wfp254460.pdf

71. Context and protection risk analysis within WFP were found to be generally limited and with limited effect on programming. Even though protection-sensitivity assessments were conducted by WFP in selected operations, notably in Nigeria[101] and in Iraq,[102] (see Box 4) the evaluation did not find systematic analysis of protection issues. In some countries, risk analysis is done when a new assistance modality is being applied.

72. Although there is a system in place for context analysis, with clear guidance on protection analysis in the protection manual and trainings,[103] the extent to which country offices actually engaged in context and risk analysis was found to depend to a great extent on country office senior managers' interest and decision-making, or on the personal innovations of field staff. While there were very significant examples of context analysis in some countries, the lessons and practices were not transferred across to others.

73. Furthermore, protection contextualisation was limited: in many of the cases studied, the analysis of threats and vulnerabilities was insufficient, outdated or simply not carried out. In protracted crises like Afghanistan, Pakistan, Somalia, Democratic Republic of the Congo or Niger, contextual factors created highly complex systems. Yet the analysis in the standard project reports was mostly descriptive and quantitative (see Annex 10 for more detail).[104]

Box 4. WFP comparative advantage

In Iraq, where the protection cluster lists a particularly large number of risks, WFP has developed its own situation analysis or approach, but in specific areas of reporting. The existing monitoring and evaluation templates in Iraq cover risks. However, the staff do not see the results being used by senior management and programming staff, with the exception of corruption issues, which are carefully addressed. The work is instead delegated to the protection cluster and the United Nations humanitarian coordinator, one step removed from ground reality as seen by WFP food monitors and cooperating partners. The unique presence of WFP in many risk areas within countries gives it potential access to vital protection information, a fact that acknowledges WFP comparative value in most countries.

74. WFP has undertaken a series of studies on protection on different topics including gender based violence[105] and migration[106] and these have contributed to enhance in-house and humanitarian community knowledge on these key issues. Studies on specific modalities, like protection in cash based transfers[107], have also been completed. This evaluation echoes the findings of the 2014 gender policy evaluation, which identified that the use of gender analyses in WFP programming had been 'patchy'[108] (during the period 2009-2014). As the gender policy was developed in 2009, three years before the protection policy, this evaluation notes that gender considerations are currently more fully incorporated into the design, targeting and implementation of all types of activities than protection aspects. Gender has become more integrated into WFP staff mind-set, and has been given visibility across all individual sectors.

[101] See WFP. April 2016. Protection Risk Analysis, North-eastern Nigeria.

[102] Documentation on transition camps and resulting shifts in programming, as well as a series of special reports.

[103] The *Protection Guidance Manual* (OSZPH unit, September 2016) warns that "all programmes run the risk of adding to or creating additional harm to beneficiaries if not based on careful context analysis and monitored regularly". The manual describes what is a protection analysis, the necessary steps in conducting it and how to use the results of the analysis to ensure that protection is "naturally embedded in WFP programming".

[104] More specifically, the SPRs templates allow for a short narrative on protection achievements and performance to be presented either in a dedicated section on "Protection and Accountability to Affected Populations" or included under the section "Progress Towards Gender Equality". In either case, analyses are generally poor.

[105] WFP. *Enhancing Prevention and Response to Sexual and Gender Based Violence in the Context of Food Assistance in Displacement Settings,* 2011.

[106] WFP & IOM. 2015. "Hunger Without Borders – A Preliminary Study on Migration, Violence and Food Insecurity in Central America Northern Triangle", WFP, IOM, 2016. This study was led by RBP. OSZPH provided funds and technical assistance.

[107] WFP & UNHCR. 2013. *Examining Protection and Gender in Cash and Vouchers*.

108 Only 5 portfolios out of 20 analysed had integrated a gender analysis in programme designs. Evaluation of WFP 2009 Gender Policy, WFP, January 2014.

Noting that gender was subject to a series of critical evaluations, this would suggest that it is a question of time before protection is given the same level of priority. However, a closer analysis of project documents shows that protection would need a wider evidence base to achieve its full scope. Important aspects, such as access to assistance, or the differentiated risks faced by beneficiary groups, are shared analyses between protection and gender.[109]

75. Structural factors and an organizational division of labour would indicate the need to develop tools specific to protection. For example, vulnerability assessment and mapping (VAM) assessments rely mainly on quantitative tools handled by individuals trained exclusively for them, with limited scope to include qualitative and lateral evidence - which is key to protection reporting. A number of country offices have increasingly made specific provisions for identifying protection issues within vulnerability assessment and mapping, particularly m-VAM as observed in Afghanistan and the Democratic Republic of the Congo.

76. Other assessments, such as food security and nutrition assessments, rapid assessments, feasibility and market studies can, in particular, outline how food insecurity is linked to violence, coercion or deprivation. In some countries, these have included considerations of women's and girls' protection. Many link the notion of protection to activities such as food assistance for assets (FFA) and cash based transfers (CBT), both of which increase the range of choices for food-insecure affected populations. The evaluation found that WFP staff were sensitive to and capable of understanding protection issues related to food security.[110] In some countries, WFP drew on, and contributed to, the analysis conducted by protection clusters. Best practice cases can be found in the Democratic Republic of the Congo and Iraq, where WFP staff developed a significant ability to elicit and take into account operational information.

Policy Direction 2. Incorporating Protection into Programme Tools

Finding 7: Programme tools have begun to integrate protection practices and knowledge. The next natural step is to ensure that this is done systemically across the organization.

77. The evaluation found that the policy did not result in a systematic integration of protection into programme tools. There was some influence of protection considerations on programme tools, in particular on conditional and unconditional cash based assistance, and targeted assistance to vulnerable groups. This was done more on the basis of pragmatic considerations than based on WFP protection guidance. An example of this was in Lebanon, where the empowerment of the recipients of WFP cash based programmes was not seen as a protection objective, yet was a positive protection outcome.

78. Post-distribution monitoring (PDM) increasingly includes protection and vulnerability questions. However, the evaluation noticed that harmful coping mechanisms that existed in many countries were not reflected in post-distribution monitoring. Examples included: child begging, forced migration, prostitution, child recruitment by military or armed groups and early or coerced marriage. The team identified cases where this was addressed, for example in Malawi, where reports detailing the dynamics of transactional sex were used to inform programming.

79. Other tools that integrate protection and accountability to affected populations, such as cash-feasibility studies, were restricted to the promotion of safety and dignity of the beneficiary

109 For instance, in El Salvador, the differentiated risks of young people, considered to be the most vulnerable group, have to be paid special attention.

110 This also concurs with other evaluations such as the response to the Syria crisis *(An Evaluation of WFP's Regional Response to the Syrian Crisis, 2011-2014*, Jim Drummond et al. 2015). It states that WFP staff demonstrated an understanding of gender and protection issues in all the fieldwork locations.

populations. Going beyond the analysis of safety and security issues in cash-feasibility studies to include broader protection considerations could facilitate, for instance, an understanding of how cash is managed at a household level and the related protection implications.

80. Telephone "hotlines" and other complaint mechanisms are important tools, due to their ability to bring up information from the field on the perceptions of beneficiaries and stakeholders. According to the 2015 accountability to affected populations baseline survey, 66 percent of WFP country offices reported having at least one complaints and feedback mechanism (CFM) in place, which is, from a quantitative perspective, a positive result of the accountability to affected populations strategy (rather than the protection policy). A more recent survey from the SCOPE team indicated a significant upward trend: by 2017, out of 84 country offices surveyed, 60 percent reported having a formal system in place, and by end-2017, 87 percent of country offices had feedback mechanisms in place[111].

81. However, this last survey found that respondents felt that they did not have control and were not able to trace the feedback. It also found that not all hotline users had the opportunity to express their feedback, and that WFP did not manage feedback efficiently and effectively. This aspect was corroborated in various interviews with beneficiaries as well as partners.

82. The type of information that complaints feedback mechanisms obtain relates primarily to distribution modalities and targeting, rather than to issues of protection. In places like Lebanon or the Democratic Republic of the Congo for instance, only 5 percent of calls relate to protection.[112] The accountability to affected populations guidance states that the hotline is to be used for instances of abuse or extortion or discrimination, as well as concerning technical issues relating to the good functioning of the delivery system for beneficiaries.

83. The WFP experience in Malawi, on the other hand, shows that deploying multiple complaints feedback mechanisms, such as suggestion boxes, toll-free lines, focus group discussions, and community feedback meetings, can play a key role in detecting abuses. Examples of such abuses include: abuse and interference with the targeting process by some village chiefs; forced sharing of rations; exclusion of more deserving households; physical abuse by some spouses emanating from intra-household conflict; and corruption. The good practices found in Malawi could be replicated in other operations to reinforce the use of these mechanisms for the early detection of problems including abuse, exploitation, misconduct, fraud, or corruption, as outlined in the accountability to affected populations guidance.

84. As regards the involvement of affected populations in programmes, the electronic survey targeting WFP staff showed that this is ensured in most cases during implementation and monitoring stages (92 percent reported for both). Populations also participate in the assessment (68 percent) and evaluation (73 percent) phases. However, in the design phase, affected population participation was comparatively low (45 percent).

85. The accountability to affected populations results reflected in the corporate indicators can be attributed mainly to an increasing effort by WFP to build community awareness. This was seen in places such as Lebanon and Democratic Republic of the Congo with the use of SMS text for electronic vouchers and the increasing number of calls through the hotline. These are innovative practices that relate to the increasing digitalization of development and humanitarian work.

86. The high protection (safety) results in the corporate results as reported by WFP staff are partially attributed to WFP safety mitigation measures to enable a safe environment for affected

[111] WFP 2017 Annual Performance Report

[112] Such a low proportion is not due to the prevalence of logistical issues, as shown during field visits, but under-reporting. In fact, the coverage is now countrywide and this percentage has jumped to 15 percent by October 2017. WFP shared the results with the protection cluster and the humanitarian coordination at country level for further action.

populations. These measures include: good crowd management in distribution points; prioritizing entitlement transfers to women; community consultation and sensitization on the use of cash transfer; messages highlighting beneficiary entitlements and feedback mechanisms.

Finding 8: The programmes observed by the evaluation demonstrated considerable potential to deliver positive protection outcomes. These are not yet understood or integrated from the perspective of a strategy at the country level, but rather as individual programme gains.

Policy Direction 3. Integrating Protection into Programme Design and Implementation

87. The evaluation found examples where protection was an important consideration in the design of assistance or targeting. For instance, in the Democratic Republic of the Congo, or in El Salvador, where the country offices targeted victims of violence (returnees and migrants) in relation to their protection risk. These were often based on senior managers' initiatives with the endorsement of the country director.

88. The evaluation found that programmes in which community assets were created generated opportunities for greater dignity within communities. This was evidenced in countries like El Salvador and Malawi. School feeding, and programmes aiming to build social safety nets had, in places like Uganda, Turkey, El Salvador or Lebanon, a specific objective of reducing and/or preventing intra-communal tensions. They served other protection aspects such as protecting against child labour, child recruitment, early marriage or domestic violence. Unfortunately, these objectives were not always reported.

89. Other positive examples of protection-compatible objectives in WFP programmes included strong advocacy to donors regarding the potentially destabilizing effect of pipeline breaks in Lebanon. In Uganda, despite considerable difficulties in managing a regular pipeline, most partners also recognized the fundamental contribution WFP made to the overall humanitarian response and to the refugee crisis. They also recognized the ability of WFP to adapt its assistance to changing needs and challenges.

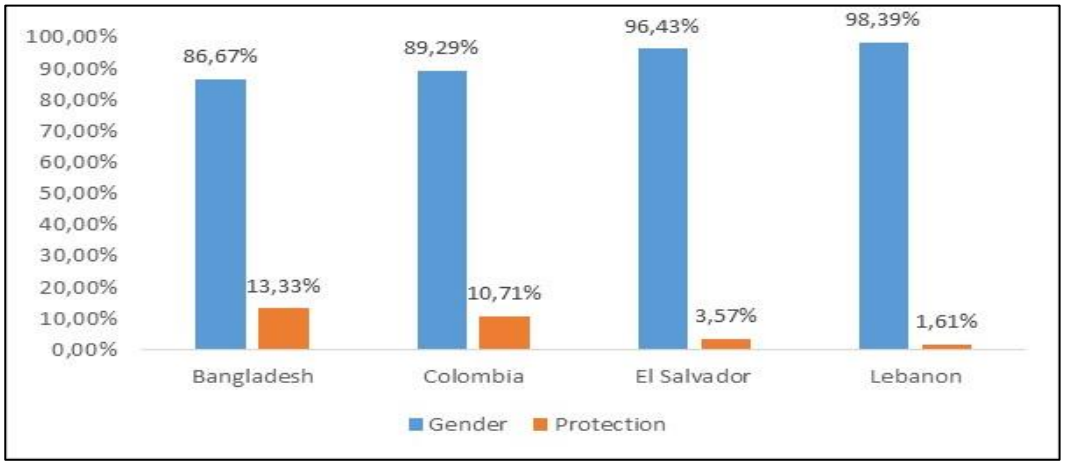
Box 5. Strategic programming links to protection

Concerns about social cohesion in Lebanon, which hosts the largest refugee population per capita in the world gave rise to the Lebanese Crisis Response Plan (LCRP) in 2014. The LCRP acknowledges the need to address vulnerability across the country. It also recognizes the implications of large concentrations of refugees for host communities who are "sharing their land, their schools, their water resources and health centres." The LRCP is part of an overall stabilization strategy to address social discord and to strengthen the capacity of national and local service delivery systems. While WFP was not heavily involved in the launch of the LCRP, its programmes and efforts towards addressing protection concerns in its activities allow the efforts to converge under LCRP objectives. The country programming effort intentionally seeks to defuse tension and hence enables the refugees to maintain asylum in Lebanon.

90. Other country case studies presented more positive examples of protection integration at design and implementation stages. In Colombia, the country office promoted United Nations collaboration for the integration of tools to address protection issues jointly. The country office also urged common efforts by the United Nations to address forced child recruitment by armed groups and to seek ways to safeguard girls from such practices. In Uganda, protection aspects related to population safety, dignity and integrity were reflected in the food basket monitoring questionnaires. In El Salvador, gender and protection considerations were included in the development of participatory communal plans.

91. The analysis of the available country strategic plans during this evaluation revealed very limited explicit attention paid to protection. A word search of the documents for the 12 case countries showed that "social protection" references, for example, vastly outnumbered "protection" references, (understood in terms of safety, dignity and integrity). Where the relevant issues were mentioned, these were presented under contextual and programmatic risks. There was no reflection of the two protection-related cross-cutting results. This demonstrated that country offices had difficulty in adopting this concept in planning. (There was also a very real constraint of word limits in these documents.) For example, while Lebanon was making important steps in achieving protection outcomes for the population, it did not explicitly plan for these in its statement of intended outcomes and reporting plans in programme design documents.

Figure 5: Word analysis gender versus protection in country strategic plans



Source: Evaluation team

Policy Direction 4. Developing Staff Capacity

Finding 9: A considerable investment was made in protection training, but evidence that the training translated into practice was limited. Staff remained to some extent unclear as to which practices they should undertake. Protection advisers and focal points were dependent on the endorsement of senior staff to achieve progress in protection.

92. Protection training, aimed at focal points and at protection advisers, was delivered to all regions through various workshops facilitated by personnel from headquarters,[113] even before the policy approval in 2012. The training material reviewed by the evaluation team represented multiple iterations, reflecting a will to learn and adjust to the specificities of each country. Gender was systematically introduced in all protection training content. Many interlocutors stated that protection materials and training were useful and of good quality, but prone to be forgotten. Current guidance was perceived to be short on concrete examples of actions to take.

93. According to the 2014 policy update, widespread training had increased knowledge about protection, and increased the commitment to designing programmes to enhance protection outcomes. Of respondents to the online survey targeting WFP staff, 61.5 percent reported having attended training on protection (representing a total of 333 persons). Of those, 33 percent

[113]A last series of workshops have been organized in all regions in 2016-2017. The first and second workshops took place in October 2016 in Nairobi (20 people from RB Nairobi and COs were trained) and in November in Johannesburg (25 people from RB Johannesburg and COs trained). Four additional regional workshops were scheduled in 2017 (RB Bangkok, RB Cairo, RB Panama and RB Dakar). Protection and AAP in WFP. Key Achievements. OSZPH. Nov 2016.

attended non-WFP training on protection. Protection has also been integrated in several other training modules and annual workshops, such as those for reporting officers and logistics.

94. Positive attempts to define training plans with estimated budgets and timeframes were made in the policy implementation plan in 2012 and later in the OSZPH strategy. The evaluation found that these depended to a large extent on country offices' demands. Indeed, the OSZPH strategy, for instance, indicated that protection and accountability to affected populations guidance and training was expected to include three crucial components during the 2015-2016 timeframe: research and studies, updated guidance, and trainings.

95. Before that, in 2012, the policy implementation plan defined more concretely the activities to be fulfilled under the "training and capacity development" component.[114] Follow-up reporting of this policy direction - especially after the 2014 policy update - was not available to the evaluation. Such information would have given a clearer picture of what trainings were delivered, where, and what were the results and implications in terms of capacity development, beyond what was expressed in interviews.

Table 5: Training component in projects recorded in cross-cutting indicators

Training in cross-cutting indicators	2014	2015
# projects per year	108	132
# projects with a training component	47	29
% projects with a training component over total number of projects	43,5%	22,0%

Source: Evaluation team based on WFP Dacota and COMET 2014-2015

96. Table 3 shows a clear downward trend in 2015 of the number of projects with a training component, compared to the previous year, which reflects a shift in the emphasis on this policy direction.

97. Evidence that the training is translated into practice is limited (although this does not mean that it does not exist). This is due to: the isolation of former participants in their respective operations; the diversity of situations; and the pressure of other thematic and cross-cutting priorities. The evaluation did find that where there were differences of performance, this was probably more frequently linked to personalities than to staff seniority or the type of position (stand-by partners, focal points, advisers). That said, the evaluation was not able to generalise across typologies of staff or countries.

98. However, in deteriorating operational contexts, sustained support in protection is required to ensure sufficient action. To this end, WFP has increasingly invested in deploying stand-by protection experts. The number was considerably higher in 2016 (eight experts) than in previous years (between one and four experts).[115] In 2015, experts from the stand-by partners' roster were trained in protection and accountability to affected populations by WFP.[116] In countries where stand-by protection experts were deployed for a few months, the transfer of protection knowledge was not always done in a systematic manner. Many survey respondents explained that gaps in deployment and the absence of a documentation system meant that they had little awareness of previous achievements prior to their own arrival.

114 These activities were: Activity 1- "Three-day standard training and workshops on guidance for mainstreaming"; activity 2-"Training with complementary modules on "Do No Harm", international law and principles, humanitarian negotiations, and prevention of sexual and gender-based violence, as required" and activity 3—"Training and mentoring of protection focal points at the country office and sub-office levels; workshops at the regional bureau level".

115 List of standby partners 2012-2016. OSZPH. Among the study countries, only Uganda and Nigeria were supported by a stand-by partner in 2016.

116 Protection and AAP in WFP. Key Achievements. OSZPH. Nov 2016.

99. The success of protection focal points[117] in strengthening internal attention to protection matters largely depends on the extent to which senior management decides to take ownership of the protection dimension of the WFP portfolio. The evaluation team found cases of countries where the senior management commitment was low, but the focal point succeeded in promoting protection internally because of his or her own commitment, and countries where the opposite happened.

100. Protection focal points find their work in protection affected by competing priorities. For instance, a majority stated that their terms of reference were too generic, and others that they had not received them even if they existed corporately. At least half of the advisers interviewed stated that they had only a minor responsibility for protection, while a third had dual gender and protection responsibilities – responsibilities that do not relate easily, as will be seen further on. Focal points are not fully dedicated to protection; they have many other responsibilities within the organization. Therefore, in general, they call for greater staff co-responsibility for the policy's implementation. In addition, a minority of them do not possess a strong protection background (Regional Bureau Dakar, Democratic Republic of the Congo, Niger, Nigeria, Uganda and Regional Bureau Nairobi, are examples where focal points have received a specific training on protection). There is no interlinked community, such as through the intranet for WFP communities.

101. Although the majority of interviewees indicated only a vague awareness of the WFP protection policy among WFP personnel, this was contradicted by the responses to the staff online survey: 86 percent of WFP staff stated that they were moderately to extremely familiar with the policy. A high demand for training was expressed (in the survey and interviews) by all categories of WFP staff. This probably reflected a perception of the importance of the policy, and that staff should be implementing it, but that it was not yet practical knowledge.

102. Protection was found to be mostly associated with the "Do no Harm" approach and was equated with SGBV, PSEA or accountability to affected populations concepts. Broader implications, especially in how programming could be better done, and the role WFP could play in increasing the protection of beneficiaries and wider populations through other outcomes, are lacking. There is a clear demand for a new focus on building capacities through training, workshops, senior mentoring, or an exchange of experience across regions. Some field staff noted during the interviews that they did not feel personally empowered enough to pursue the implementation of the policy.

Policy Direction 5. Establishing Informed and Accountable Partnerships

Finding 10: Partnerships remained an under-developed resource for protection within WFP. Recent progress has been made in the integration of protection considerations in field level agreements and retail strategies in cash based transfers.

[117] It should be pointed out that the evaluation did not find a living inventory of the names and presence of protection focal points globally. As per WFP focal points datasets (Nov 2016 and Jan 2017 lists), including humanitarian advisers, protection advisors and protection focal points, there is a variable number of approximately 40 staff in WFP (RBB: 2 countries; RBP: 13 countries; RBC:7 countries; RBB:3 countries; RBN:14 countries; RBD:1 country). Source: four excel files obtained from regional bureaux.

103. A 2016 evaluation of the corporate partnership strategy stated that WFP is still influenced by a "transactional approach" to partnerships, meaning that their partnership strategies are based on rewards for services provided. Similarly, a 2016 evaluation of the WFP capacity development policy[118] pointed out that partnerships focused on coordinating parallel interventions rather than engaging in joint needs assessments, planning, implementation, or monitoring of capacity development processes. This limited opportunities for synergies and was not helpful to host governments in their efforts to coordinate the support they received from different partners (see Box 6).

104. This is corroborated by evidence from evaluations as presented in the WFP annual evaluation reports from 2014 and 2015, as well as from the WFP Synthesis of Operational Evaluations, among others. While these relationships can result in some benefits to the respective organizations, related results are neither systematically monitored nor reported upon. This is further echoed in protection: expectations are not enforced rigorously and the partnership is still incipient. The government, as the main WFP partner, is, in most countries if not all, directly involved in the design and implementation of programmes. However, country offices have noted that WFP has made limited use of opportunities to influence government public policies and protection practice.

Box 6. Inter-agency achievements

Whenever possible, WFP Uganda works closely with UNHCR and the United Nations Development Programme (UNDP) in the assessments of internally displaced people sites (Gulu) and return areas (Lira).

In El Salvador, although WFP has established accountable partnerships with other United Nations agencies and NGO partners with sound protection expertise, such as World Vision, Oxfam, Save the Children, PLAN, the International Organization for Migration (IOM), United Nations Population Fund (UNFPA) and UNHCR, there seems to be a need to further improve joint learning and accountability on protection matters.

105. In general, international NGO partners demonstrate a proactive engagement on protection matters. Partners demonstrate a strong sense of local power structures and tend to have significant interactions with affected populations. For that reason, partners are, in principle, well-placed to refer protection cases and help improve referral systems under partnership with WFP and in coordination with specialized agencies. However, such referral systems are weak or inexistent.

106. WFP has an increased focus on protection in partnership. The Letter of Agreement between IOM and WFP in Afghanistan, for instance, contributes to the continued identification and registration of the most vulnerable and undocumented refugees arriving from Pakistan, and to the immediate distribution of WFP emergency food assistance. In 2016, WFP established partnerships with 14 national and international NGOs in order to scale up operations and enable WFP to reach vulnerable communities across the country.[119] Across the various partnership agreements, WFP ensured the inclusion of protection considerations as an Annex that had to be signed and respected by all partners.

107. One positive achievement was the introduction of protection considerations as a corporate commitment in the appendices of the field level agreements (FLA), which could be further adjusted

[118] 'Policy Evaluation: *WFP Policy on Capacity Development. An Update on Implementation*. Marie-Hélène Adrien et al. January 2017.

[119] WFP Afghanistan, EMOP 102024, SPR 2016. Also, in order to improve targeting and the quality of data and assessments, WFP, FAO, the food security and agriculture cluster (FSAC), and the Ministry of Agriculture, Irrigation and Livestock (MAIL) have integrated their information systems to support joint decisions on targeting and food security intervention modalities. This has been achieved through innovative multiple data sets and updated methodologies such as the Afghanistan Living Conditions Survey (ALCS), Integrated Context Analysis (ICA), Seasonal Food Security Assessment (SFSA), and the Integrated Food Security Phase Classification (IPC).

to achieve better protection results, as observed in Iraq, Uganda, and Niger. In Niger and Iraq, specific obligations were reflected in the reporting methodologies.

108. Establishing partnerships with cooperating partners involves the follow-up of field level agreements, which is a significant challenge. In Niger, WFP reduced the number of field level agreements with cooperating partners from over 100 to 15 national and international NGOs, a more manageable figure that allows for better follow up and integration of cross-cutting issues. In challenging areas for protection, such as Diffa (Niger), WFP reinforced partnerships with organizations and local actors that were able to manage protection, access and related issues. The field level agreement with Danish Refugee Council and the transfer agreement with the International Committee of the Red Cross (ICRC) in Bosso exemplify this.

109. There is sometimes great willingness among WFP partners to engage in protection. Some have espoused human rights based approaches, for example, or see their organization as being active in peacebuilding. Independence, good understanding of conflict dynamics, and flexibility in programming, are observed common values of many international NGO partners that could eventually drive forward the WFP impact in protection, and could be further exploited by WFP.

110. However, according to the staff survey, WFP field staff felt they lacked the capacity to enhance partners' capabilities in protection. Moreover, the evaluation found that WFP partners generally had little practical knowledge of the protection policy,[120] but they did express an awareness of the role that WFP seeks to play. This is because the field level agreements include multiple annexes regarding the policy, related standard operating procedures, and various checklists for gender and accountability to affected populations. Some partners highlighted the need for precise WFP requirements related to protection programming and clearer corporate measures to prevent and mitigate the potential negative impact of food assistance.

111. WFP has become an active participant in protection clusters in a number of countries, which is a positive move, but these are often limited to the exchange of information. In one country operation visited, there was some support provided by WFP for the elaboration of a United Nations system-wide protection strategy for the country, an exercise hosted by United Nations High Commissioner for Refugees (UNHCR) but the exercise struggled to obtain traction with all the relevant United Nations bodies. Partnership and collaboration with UNHCR in emergency contexts where refugees are involved varies considerably at different times and places - or even within a country where partnership between different sub-offices and UNHCR varies.

112. The tools that WFP created, particularly for cash based transfers, the SCOPE platform, field hotlines for grievances, and the opportunity to collect more data on the conduct and well-being of beneficiaries, are perceived by partners to offer new opportunities to detect: i) instances of extortion of rent-seeking to the detriment of the card holders; and ii) reasons for displacement or iii) conflict dynamics.

113. Some of the consulted national NGO partners have developed their own protection policies and tools, but all of them (having developed a protection policy or not) claimed they need more country office support to integrate protection and to apply the WFP protection policy. In turn, WFP staff members stated that it would be useful to include a clause in the field level agreements describing practices going beyond the corporate format.

114. NGO partners highlighted the need for greater WFP presence in monitoring activities, and the renewal of third party monitors from time to time to ensure independence and confidentiality. They recommended: more WFP coordination with other United Nations agencies on protection; better planning of the ration size and its protection implications; and increasing the incentives for

[120] While 50 percent of respondents to the evaluation online survey stated that they are moderately to extremely aware, this was not reflected in the interviews, which tended to be more conclusive.

national NGOs to maintain a critical level of capacity. They also recommended that WFP should cover the operational costs, instead of partners or suppliers, in instances where a planned delivery had to suddenly stop for reasons of budget restrictions or pipeline breaks. Instances such as these undermined the organization's capacity to adequately carry out other protection-related activities.

115. Suppliers, such as retailers, or transporters, showed the least understanding of protection considerations. While WFP provided training to national and international NGO partners in accountability to affected populations, protection, the code of conduct or PSEA, the evaluation found no evidence that training was provided to suppliers.

Policy Direction 6. Managing Protection-Related Information

Finding 11: WFP made recent progress on guidance and systems for beneficiary data protection and privacy. However, an increasing amount of protection-relevant information is collected in a fragmented way by WFP and its partners. There were unclear lines of responsibility regarding which agencies should act on this information.

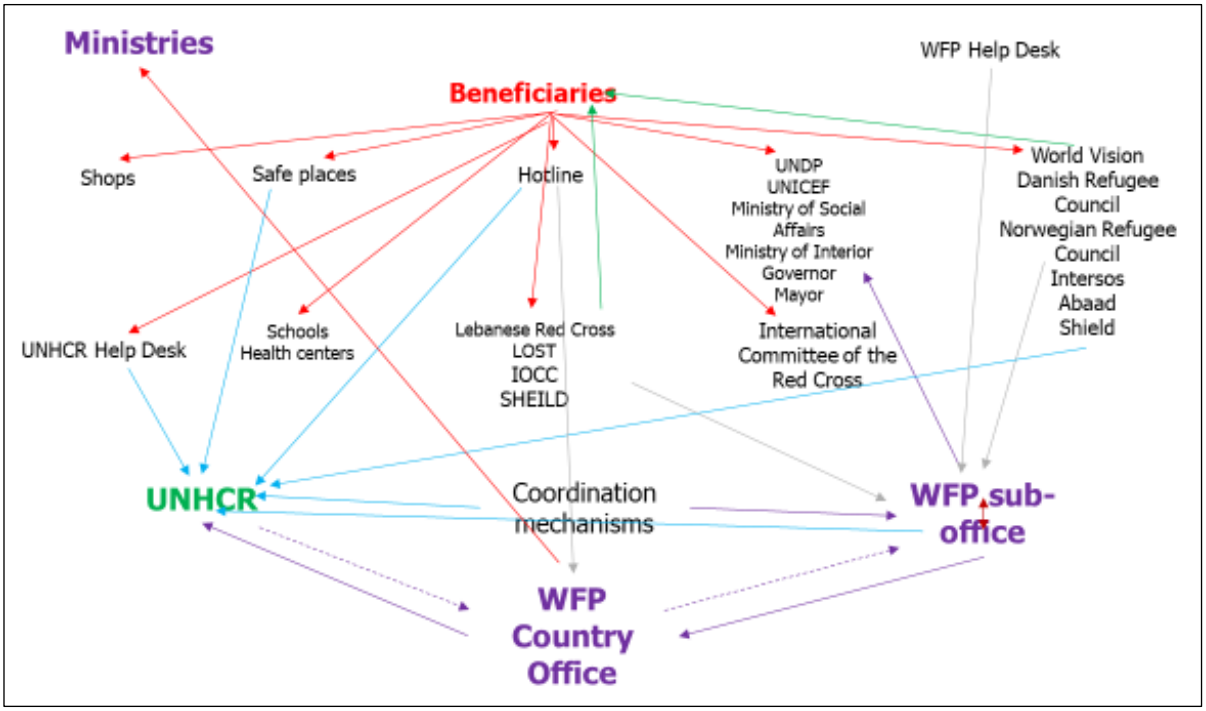
116. Although involving the government in assessments such as vulnerability assessment and mapping is a good practice in itself, there have been significant constraints in some operational contexts in the way threats and vulnerabilities can be presented as a result. This includes sharing data on the risks faced by communities (including security incidents) or the identity of respondents.

117. The most striking observation concerning protection is the lack of clarity over reporting, hotlines, and referral systems, and how to safeguard protection-related information. There is a lack of clarity about which decision-makers should respond to such information, and about the best way of storing and communicating this information to these decision-makers. The results of a 2017 survey on feedback mechanisms[121] confirmed the evaluation's findings: 23 percent of respondents reported that standard operating procedures and focal points for serious protection cases were not in place.

118. The evaluation mapped the information flows relating to protection in Lebanon and the Democratic Republic of the Congo. It led to surprisingly complex diagrams (see Figure 6) that are hard to justify, and reflect potential for data loss and a threat to confidentiality, as control over the data becomes less manageable. There is no comprehensive concept of how protection-related information should be managed, and no central data system in which it could be collected. WFP staff in different country offices for instance, often questioned if protection-related information should be managed by WFP.

[121] Results of the survey on beneficiary help desks and feedback mechanisms, Assistance Service Desk, 2017

Figure 6: Diagram of referral and reporting containing protection information in Lebanon



Source: Evaluation team

119. WFP is developing its data protection guidance and systems to a considerable level, and is further developing corporate tools to enhance privacy, with a particular focus on the registration of beneficiary data. This reflects the increasing threat of unauthorized use of this information for predatory or commercial purposes, or for human rights violations by state and non-state actors who are able to penetrate and capture systems such as SCOPE. The evaluation found that these potential breaches not only concerned digital data (which is the primary focus of the data protection efforts in WFP) but also information exchanges in general.

120. The evaluation observed a highly protected and streamlined system for PSEA. Similarly, important consideration was given to the potential misuse by suppliers of data generated by the cash based transfer debit cards. There were, however, many cases where the transfer of protection-related information to partners was at risk, as it was easily accessible to potentially hostile actors, whether through the protection cluster (for example state security agencies are members of the cluster in some locations), or cooperating partners with very different abilities to ensure confidentiality.

2.2.2 Achievement of Beneficiary Outcomes

Finding 12: There was a significant achievement of positive outcomes in a number of the areas outlined in the protection theory of change. These outcomes tended to reflect new practices in WFP, such as community feedback mechanisms and cash based transfers. WFP and cooperating partners' efforts created an environment where the exposure of beneficiary groups to threats was reduced. Affected populations were treated with respect while participating in WFP programmes.

121. As the protection policy implementation approach indicated, measuring protection outcomes was challenging, given the lack of baseline data and the fact that many external factors

influenced protection risks and coping capabilities.[122] This challenge of attribution was offset by the fact that outcomes were clearly related to specific examples of delivery. Key achievements and areas for improvement were assessed in the following sections against the intended outcomes elaborated in the theory of change.

Safety risks associated with participation in programmes

122. In general terms, the most vulnerable population within a beneficiary category has been given consistent priority by WFP, whose teams seek to mitigate hunger while minimizing protection incidents, either before, during, or after WFP provision of assistance. WFP and cooperating partners' efforts to properly access risk areas and be present at distribution sites ('protection by presence') have created an environment where the exposure of beneficiary groups to threats is reduced. Safety at, and around, distribution areas was a frequent focus of staff comments during semi-structured interviews, but also in the evaluation survey results. After the protection guidance manual, the two documents to which staff survey respondents claim to refer the most are "Protection in Practice – Food Assistance with Safety and Dignity" and the training manual on "Do No Harm".

123. The indirect benefits of some of the new modalities of WFP are effective. The evaluation found that getting the beneficiaries involved in community activities through food assistance for assets generated improved social cohesion that contributed to safety. Particularly interesting results were reported by WFP for small landholders and women's groups for the purchase for progress (P4P) activities in Democratic Republic of the Congo. The launch of new methods, such as the Maano virtual farmers' market uses digital technology for farmers to interact with remote markets.[123] By reducing the need to travel, it effectively reduces the exposure to threats that may come from local insecurity, while increasing empowerment.

124. The use of conditional cash (cards to be used in selected shops for food only) is described by beneficiaries (in Democratic Republic of the Congo and in Lebanon) as a greater guarantee of safety than unrestricted cash, as unrestricted cash increases exposure to threats of extortion. These threats materialize at the point of withdrawal of the cash, but are continued into the home, where, for example, beneficiaries may be exposed to extortion from property owners.

125. The traditional role of food and other in-kind assistance is rapidly giving way to cash based transfer modalities, in settings where this is feasible. However, attention to protection considerations is difficult to discern and protection outcomes are not reported clearly in actual operations or in WFP documentation. The evaluation found that in most places, monitoring at the distribution points (the retail outlets) was very limited. Beneficiaries tended to go to the cooperating partners to address issues. The burden of collecting the complaints and addressing them fell disproportionately on the cooperating partners' help desks, which were not always fully trained to undertake these tasks.

Reduction in the reliance of affected populations on negative coping mechanisms that expose them to protection risks

126. Post-distribution monitoring is a primary tool used by WFP to detect negative coping methods adopted by affected populations. The evaluation observed in many countries (e.g. Niger, Uganda, informal settlements in Lebanon and camps in eastern Democratic Republic of the

[122] Humanitarian Protection Policy Implementation Approach, Humanitarian Policy and Transitions Servers, Policy, Planning and Strategy Division, WFP 2012.

[123] One of many initiatives supported by the WFP Innovation Accelerator, which builds on the boom in digital communications.

Congo), that despite WFP finely targeting the most vulnerable populations, households shared the assistance with other non-targeted groups, recreating a form of social capital (although possibly increasing the targeted groups' vulnerability and their exposure to protection risks). This was also found amongst the highly food insecure populations of Malawi where post-distribution monitoring reported a significant influence of village power structures. Forced sharing in Malawi and the influence of village power structures exposed beneficiaries to protection risks.[124] In Pakistan, some NGOs who were interviewed noted that coping mechanisms involving sexual transactions were often not discussed for cultural reasons, and would warrant greater attention.

127. The evaluation also noticed that there were positive and negative unintended effects of which WFP staff was aware, but which went under-reported under protection. For example, the inevitable but unfortunate consequences of unforeseen shortages of funds meant that the country offices were obliged to reduce the planned assistance, creating pipeline breaks. In turn, pipeline breaks can eventually create a new set of risks such as displacement, prostitution, etc.

128. The use of a "protection lens" at pipeline breaks reveals and addresses such new risks. In Democratic Republic of the Congo, it is not possible for populations living in displaced camps to return to their home areas, where they have lost their means of livelihoods. Respondents stated that they would pursue their route towards urban centres, facing increased risks. In Malawi, on the other hand, the complaints and feedback mechanism tends to cease operating once an emergency operation winds down, with no handover to school feeding or food assistance for assets.

Voice and choice

129. To operationalize accountability to affected populations, WFP focuses on three key areas: information provision, participation and complaints feedback mechanisms. The evaluation found that affected populations have increased voice and choice as a result of WFP efforts. Activities were undertaken by WFP and its partners to increase the proportion of assisted people informed about the programmes, thanks to the introduction of new technologies and modalities, such as hotlines, smart phones, or the use of information from credit cards to avoid fraud or extortion. However, the ways in which they were kept informed - about eligibility and the possibility of complaining – was often rudimentary and at times confusing.

130. The evaluation found that it was still premature to conclude that telephone hotlines, or complaints desks were in themselves useful mechanisms to convey concerns about protection problems, before they were adequately understood within the populations concerned, with significant trust-building measures applied. The creation of such trust between the population and these new data-collection methods depends on how the information is elicited and transmitted. Currently, hotlines and other such mechanisms are used, overwhelmingly, for administrative or logistics-related queries, such as distribution times, lost pin-codes, faulty cash cards etc. However, in one province in Democratic Republic of the Congo, for example, it was possible to observe from the log books that calls were made on the hotline concerning SGBV cases, where 90 percent of these calls were from men (reporting for their family or community members).

131. There are increased opportunities for choices to be made by beneficiaries within existing programming, with more focus on vulnerability. WFP and its cooperating partners have launched over the past three years a number of initiatives to ensure community participation in programme design and implementation. In non-refugee operations, the community-based participatory planning approach is used in collaboration with other actors and contributes to supporting women and girls' equal participation in decision-making.

[124] PDM report, February 2017.

132. As per the standard operating procedure stipulated in the field level agreements, community assessments with committees are done in most places, to define vulnerability criteria and to target the most vulnerable. The key selection criteria discussed with communities are based on socio-economic conditions, households headed by women with many children, households headed by children, and households headed by a person with specific needs.

133. In addition, conditional recovery programmes such as food assistance for assets may help strengthen the target groups' capacities to meet their needs in a more sustainable manner than non-conditional emergency programmes. The evaluation therefore acknowledges the increased engagement of WFP in programmes aimed at moving from food delivery to community resilience.

134. These developments point to the emergence of new ways for communities to engage with WFP and address the risks they confront. Complaints feedback mechanisms have a direct link with protection, as WFP community feedback provides a means for affected people to voice complaints and create the basis for a dialogue on areas relevant to WFP operations in a safe and dignified manner.

135. Additionally, there is a stated perception in some of the sites visited by the evaluation, among many interviewees, that regular consultation processes with limited follow up is leading to stakeholder fatigue, and even in a few cases, to a loss of confidence in WFP and its partners. Indeed, consultation still often takes place when targeting for a project has already been approved, which means that population preferences are not always taken into consideration for programme design.

136. Moreover, although a formal community feedback mechanism should include "established procedures for recording, investigating, taking action and providing feedback to the complainant,"[125] the fact is that WFP does not give systematic feedback to populations on the consultations conducted nor on complaints. Complaints and feedback mechanisms serve mostly to receive complaints on food assistance matters such as eligibility and registration, distribution times, pipeline breaks or reductions in ration size. In many contexts, affected populations, for cultural and security reasons, are uncomfortable reporting on abuse.

137. In one country office, however, WFP staff emphasize that it is not desirable to explain the reason why some are selected and others not for inclusion in distribution lists. As some groups in the local population share a similar level of vulnerability, becoming conversant with the criteria for eligibility could lead to negative coping mechanisms (increasing one's own vulnerability) with the deliberate intent to manipulate the information to appear more vulnerable.

138. A recent internal review in Turkey found that the need to maintain confidentiality about targeting criteria contributed to a loss of contact with the population and the ways in which affected populations defined their own needs.[126] Among WFP and partners assisting Syrian refugees, the report states that there is a general consensus that the current targeting system for vulnerable people for cash assistance is leading to an exclusion error, estimated at 5 percent of the registered refugee population (approximately 145,000 refugees).[127] The empirical evidence collected during this evaluation confirms that targeting is indeed an issue, not only because people do not know what makes them eligible or not, but also because there are tangible concerns that the programme is excluding many particularly vulnerable households, thereby exposing them to protection risks.

[125] WFP Accountability to Affected Populations Brief.

[126] Bonsigniorio, M., Alvarez, M. & Aranki D. 2017. *An Overview on Protection and AAP in WFP's Emergency Social Safety Net Programme in Turkey: Findings and recommendations of the protection and AAP mission in Turkey*, 21-24 March 2017. WFP.

[127] Although Syria and Turkey are not countries of reference for this evaluation, the field mission in Lebanon and the global desk review done by the ET found these related aspects to be revealing and useful to highlight.

Respect for populations when participating in programmes

139. Respect and non-discrimination are well developed elements in WFP programming for those selected to receive assistance. Focus groups and individual interviews with affected populations showed that they were treated with respect while participating in programmes. Field monitors of WFP and its partners, as a rule, do not engage with populations as passive recipients. They make sure that the basic needs of the population are considered during implementation.

140. Some remarkable outcomes have hence been achieved with cash based transfers. The evaluation notes that the 2014 edition of the cash and voucher manual makes explicit reference to protection.[128] Those targeted for assistance are regularly consulted on their preferences for cash, vouchers or food modalities. Cash based transfer modalities clearly contribute to greater dignity, allowing the beneficiaries far more freedom of choice to determine their own strategies to meet their needs – in particular, the time at which they go to collect the assistance, the place, and with whom they go. As a woman said to the evaluation team: "we go to those special places and we feel important and the food is of better quality". This autonomy, which is a clear case of empowerment, including for women with cards, is higher than it is for in-kind general food distributions.

141. Indications collected by this evaluation are that there were no reported PSEA incidents within WFP in the evaluation period. The terms of reference for PSEA focal points indicate that: "the focal point's role will be to receive complaints and reports on cases of sexual exploitation and abuse and to take the lead in developing and implementing sexual exploitation and abuse preventive measures".[129] But in many countries, complaining is not part of the culture, which makes it even more important to supervise and follow up on these matters. According to the terms of reference for PSEA focal points,[130] country office managers need "to ensure that the focal points appoint field-level focal points at all field-offices with significant staff presence". When asking about PSEA, the field staff were found to be, in general, knowledgeable concerning to whom they should report on cases of PSEA at the central (country office) level.

142. Differentiating by gender, age, disability or diversity (as demonstrated in targeting processes), WFP programmes are well tailored to meet specific needs and capacities. The considerable effort WFP makes to access remote areas can be considered a testimony to non-discriminatory programming. Gender-differentiated needs are also well accounted for (training for men and women, adapted food assistance-for-assets work), although some stakeholders consider that "WFP has become women-oriented" and that protection should be much more than sensitivity to gender that is routinely seen as "women and girls". Programmes that only focus on women might tend to create domestic tensions and thus increase domestic violence and make women more vulnerable. The evaluation in its visits found that programmes in certain contexts target women, with great positive outcomes (management of household economy, nutritional practices, skills development, etc.). They do, however, leave men in a more passive state than before, as their traditional role is now being shared with women and they are not targeted as much as women are.

143. While there is no evidence of discrimination toward groups receiving assistance, some groups are less well served than others: youth and children's specific needs for food seem not to be particularly assessed outside school feeding. In countries where youth is the main target/victim

[128] *WFP Cash and Voucher Manual* (2014) notes in Box 11, p23 the aspects to be considered when analysing gender and protection in connection with transfer modality.
[129] List of Global PSEA focal points, WFP internal document.
[130] List of Global PSEA focal points, WFP internal document.

(such as in El Salvador), options to establish reinforced partnerships with local youth institutions could be given greater priority. In other contexts, such as Niger, extremely vulnerable individuals, unaccompanied minors, and host communities, are other categories that could be better consulted through more adapted tools. Minorities groups are especially vulnerable in certain countries and deserve attention.

Environment that promotes basic rights for affected populations

144. WFP possesses significant leverage and capacity to exercise a defining influence in dialogue with local and national authorities and international actors, either alone or in partnership. As such, the value of WFP in protection is linked with its capacity to negotiate access to vulnerable populations with governments and other actors. These negotiations are crucial for establishing "protection by presence", where the field presence of humanitarian actors is a means to prevent human rights violations.[131]

145. The large presence of WFP as a food security agency can serve to advocate for the protection of vulnerable populations. However, the evaluation observed that WFP was not frequently engaged in advocacy, although various interlocutors noted that given the WFP role in the humanitarian country team and other inter-agency coordination mechanisms, its size, reach, proximity of partners to communities, and the importance of food, it could be more actively engaged in advancing protection concerns. The situation is highly diverse (as shown by the 12 country case studies, but also in the broader literature and documentation), and, in some countries, WFP senior management has taken a very public position against the establishment of food delivery points to encourage populations to move against their better judgment.

146. It was clear, through in-depth interviews with senior managers that a principal reason for this reluctance to advocate more strongly on protection was the need to maintain the close operational relationship of WFP with state counterparts.[132] Stakeholders interviewed, however, emphasized the protection responsibility of WFP to take advocacy action. This could be done in various ways: by helping the government to incorporate a protection approach into public policies; by advocating for solving the increasing problem of food insecurity; and by implementing protection actions. Advocacy messaging may be public or private.

147. Positive, unplanned effects were also found. The partnerships established between WFP and national NGOs enabled some of these to go far beyond their sphere of operation, for example, reaching groups that they would not naturally reach. Some partners take their protection role seriously. Examples include the Lebanese Red Cross and Red Crescent, which attended to vulnerable refugee groups through their centres, providing counselling; and Caritas in North Kivu, eastern Democratic Republic of the Congo, which took it upon itself to monitor trucking companies for misconduct and take corrective action.

2.3. 2.3. Factors Explaining Results

148. The factors affecting the implementation and results of the policy were assessed, and divided into internal and external elements (see Figure 7). Internal factors included 1) factors related to the quality of the policy development and the inter-linkages with other policies,

[131] Brennan, R.J. and Martone, G., *The Evolving Role of Relief Organizations in Human Rights and Protection*. J.D. White, Marsella. A.J., 2007. *Fear of Persecution: Global Human Rights, International Law, and Human Well-Being*. Lexington Books. P86; and OHCHR. 2011. Chapter 30: *Using Presence and Visibility*. Manual on Human Rights Monitoring. New York.

[132] See WFP: Summary evaluation report on WFP's policies on humanitarian principles and access in humanitarian contexts during the period 2004–2017, 2018.

particularly gender and 2) factors related to the institutional environment, summarized in the table below. External factors were independent of WFP.

Figure 7: Findings on internal influencing factors

INTERNAL FACTORS	
Enabling	The bottom-up approach of experimentation and learning enhanced initial buy-in and relevance of the policy.
	Interlinkages between gender and protection policy strengthened both to some extent.
	Organizational capacity factors increasingly supported the partial implementation of the protection policy.
Constraining factors related to policy instrument	A diffuse normative system did not give enforcement weight to the policy.
	Lack of a substantiated vision for policy development hampered the translation of the protection policy into practice.
	Inter-linkages with the gender policy partially constrained the implementation of the protection policy.
	The pressure to demonstrate quantitatively measurable results hampered engaging in programming in protection.
Constraining factors related to the institutional environment	Lack of corporate and senior management support critically undermined the ability to drive the necessary institutional change.
	Organizational arrangements, lack of a knowledge community, and human resource capacity were inadequate or insufficient.

Source: Evaluation team

2.3.1 Internal Factors Related to Policy Building and to Quality

149. Aimed at creating a shift within WFP, the protection policy benefited from significant in-house and external consultation, but a number of limitations undermined its implementation.

150. The relevance of the policy was enhanced from the outset by a thorough policy building process focused on experimentation and learning. Indeed, the elaboration of the policy consolidated the experience of the preceding protection project and of a number of initiatives[133] testing protection approaches in different operational environments.[134] This process, often described as "organic" by its main producers, contributed to a sense of ownership among middle managers and the country office. Above all, the policy-building process made protection visible within the institution itself, which allowed it to overcome some of the internal resistance it faced.

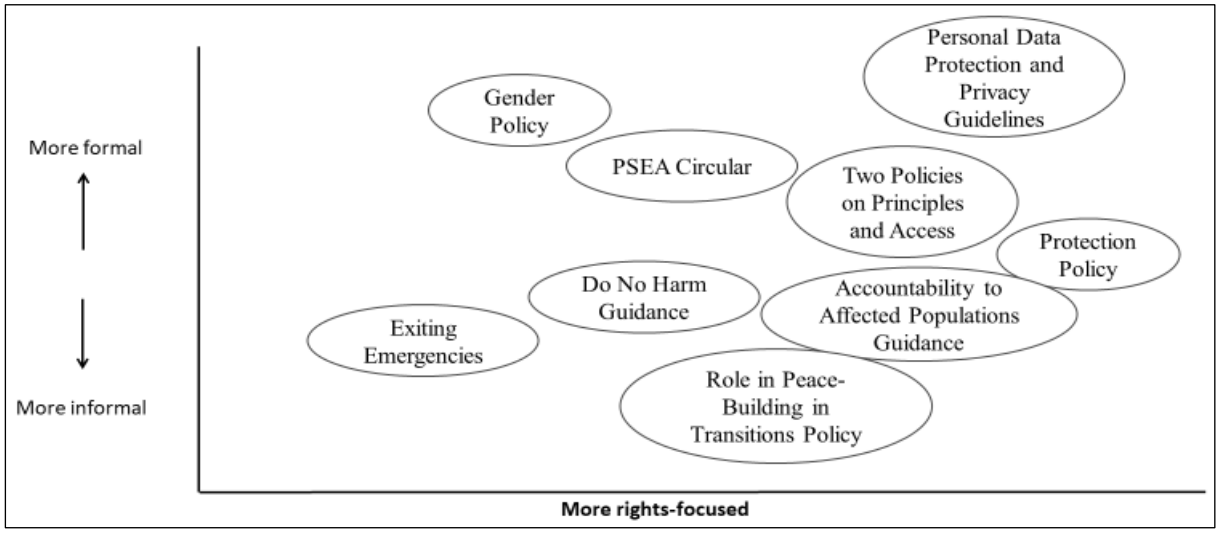
151. The evaluation found that due to a diffuse normative system, the protection policy did not have enough weight in itself to generate significant change and to ensure that it was treated as a core responsibility within WFP. As shown in section 3.1, the WFP normative system or policy framework was found to be prolific and complex. An important number of policies and strategies

[133] As explained in section 2.1, the protection project (2005-2008) consisted of a number of initiatives, including a series of protection field studies in very different country offices, as well as training, guidance and tool development at field level. In 2004, the Executive Board endorsed the humanitarian principles of humanity, impartiality and neutrality, and seven standards for WFP humanitarian action.

[134] Case studies conducted during the protection project, for example, recommended concrete actions, such as the participation of WFP in protection clusters, which was innovative at that time. Cf Case Study Uganda, Page 41 *Gender, Protection and HIV/AIDS in the Context of WFP Uganda Operations 19 September–17 October 2006*.

– such as humanitarian principles, access in humanitarian contexts, gender, accountability to affected populations, peacebuilding and PSEA - all contribute in their own way to protection outcomes (see Figure 8). Additionally, a large number of other policies are also relevant to the protection policy as a cross-cutting thematic issue, for example cash based transfers, resilience, school feeding, etc.

Figure 8: Mapping of normative documents relating to protection



Source: Evaluation team

152. While all the policies are, in principle, aligned, and equally weighted, in practice the interlinkages are not always clearly defined. The complexity of this universe of priorities was found to inhibit organisational change. A significant number of the personnel interviewed at headquarters and field level described the production of policy papers, strategies, and reviews of foundational documents as so prolific that it was difficult to track, understand or even to be aware of them. As a consequence, staff interviewed reported that it was often difficult to manage and to support policy implementation.[135]

153. In practice, change is limited to specific aspects,[136] namely "training" and "operational support". The lack of a clear vision[137] resulted in the protection policy implementation being interpreted in different ways, and with different degrees of depth. Additionally, the policy delegated to country offices the development of field-appropriate protection action plans[138] that, in the absence of a proper template, were not developed.[139]

[135] "We cannot read all the policies we have. We are not good at translating policies into practice. We cannot absorb them." Interview WFP staff HQ. "Policies need to be accompanied by clear directives, funding, champions and time". Interview WFP senior management in the field.

[136] Protection Policy Implementation Plan. WFP 2012.

[137] The protection policy did not contain an objective or a clear vision. The vision was somehow developed later on in the 2015-2016 strategy for integrating AAP and Protection "WFP's vision is that all country offices are routinely and effectively integrating these issues [AAP and Protection] into their operations and that their experiences in doing this is informing the wider humanitarian discourse". *WFP, Integrating Protection and AAP, Emergencies and Transitions Unit (OSZPH) Strategy 2015-2016.*

[138] *Humanitarian Protection Policy* page. 22. "Finally, the implementation approach outlined in this paper emphasizes field-driven protection action plans, each of which can adopt the indicators most suitable for the situation-specific protection threats that WFP is trying to address."

[139] Out of the 6 desk studies and 6 field visits, only Nigeria has developed a proper protection strategy.

154. As presented in previous sections, the interlinkages between protection and gender policies are significant[140] and both policies have faced similar challenges throughout the implementation process. However, the protection policy is far from having a comparable level of priority[141] within the organization. Building on experience since the first gender policy, its implementation is more consolidated and has received a much higher level of corporate attention, institutional support, resources and funding.[142] Organisational responsibilities are weaker in relation to protection considerations than they are to gender.[143] Gender has succeeded in launching and consolidating gender mainstreaming mechanisms, mandatory analysis and strategizing requirements.[144] This is presented in Table 4.

Table 6: Comparison of gender and protection policy implementation

Areas of greater divergence	Areas of greater convergence	Areas of potentially greater synergy
Greater corporate priority and management resources is allocated to gender	Protection is a significant element of the gender policy, and in fact protection is often interpreted in a first instance in a gendered way by WFP personnel	The policies for protection and gender could mutually further refer to each other, highlighting how a symbiotic focus should not lead to exclusion of aspects that do not overlap
The gender policy focuses on empowerment and participation	Staff tasked with protection are also frequently tasked with gender aspects, making these cross-cutting results easier to frame within programmes at country office level	Knowledge management and capacity building processes can help highlight the existence of both policies, and their importance
There is a focus on threats and vulnerabilities for population groups, notwithstanding gender differentiation	The policies converge when gender based violence and other risks are present and where gender represents the main vulnerability	While protection is more focused on risks, it can benefit from the empowerment perspective in gender which speaks to greater dignity and integrity

Source: Evaluation team

155. The protection agenda has partially benefited from being a cross-cutting theme accompanying gender, particularly in the reporting formats that now feature "gender, protection and accountability to affected populations". This evolution provided much more internal visibility to protection issues. Additionally, gender training typically included a mention of the protection policy (and vice versa), which contributed to increasing awareness among staff.[145]

156. There are important lessons from the implementation of the gender policy. The gender office has a very different budgeting structure that allows a greater scope of work, where more specifically the development of regional implementation strategies, regional gender advisors, and

[140] The 2015 gender policy complements the WFP policy on humanitarian protection and includes one objective on protection: "Objective II: Women, Men, Girls and Boys Affected by Emergencies Benefit Equally from Nutrition and Food Security Assistance According to their Specific Needs and Opportunities and in Safe Conditions." 2015 Gender Policy. The humanitarian protection policy integrates also gender considerations, notably on gender based violence. 2012.

[141] WFP. 2017. *Update on the Gender Policy*. WFP/EB.A/2017/5-D. The high priority of gender on WFP senior management's agenda is also due to corporate commitments and aligning requirements at United Nations level such as reporting on the UNSWAP since 2012. Protection does not benefit from such inter-agency reporting requirements.

[142] *Gender Policy Evaluation*. "Institutionalization of the Policy has been invigorated within the momentum of the Fit-for-Purpose strategy, where it is 'a cross-cutting theme requiring the highest level of attention across the entire WFP organization.' This is taking place under the leadership of an Executive Director who has championed a higher profile for gender within WFP. Additional staff and finance have been provided in 2013 to the gender office, which now reports directly to the Office of the Deputy Executive Director/ Chief Operating Officer."

[143] *Gender Policy Evaluation*.

[144] *Gender Policy Evaluation*.

[145] Interviews with WFP staff in CO.

in some cases the development of the country gender action plans, can be funded. The gender policy also benefited from the implementation of the protection policy,[146] partly because the gender policy specifically included one strategic objective on protection[147] (number 2, "assistance with safety" and "gender based violence"). Both areas benefit from the expertise provided for the implementation of the protection policy. The rollout of protection focal points allows the gender focal point network to concentrate more on gender equality rather than assuming the dual responsibility of gender and protection.[148] On the other hand, some interviewees mentioned that WFP gender response in emergencies is more tangible and better understood when associated with protection. In this sense, the protection policy also provides value to the efforts to advance gender equality.

158. However, synergies between these policies are not always exploited. There is an increasing number of protection/gender advisors and focal points in charge of both portfolios, which can be problematic[149] since protection and gender require a different knowledge base.[150] This "double hat" position has become a widespread practice, and gives the false impression that cross-cutting issues are being addressed without ensuring specific technical support. This affects the implementation of both policies,[151] and especially the protection policy, which is less advanced.

159. The different levels of accountability often lead the protection/gender focal point to focus on the agenda that is more likely to be implemented,[152] adding another detrimental layer to protection implementation.[153] Staff interviewed in the field working particularly in nutrition, school feeding, vulnerability assessment and mapping or monitoring and evaluation, are also sensitive to the fact that "gender is mandatory, protection is not."[154]

160. The overlap between "gender" and "protection" concepts may hamper the ability of WFP to integrate protection. The approach of the 2015 gender policy includes a slightly different definition of protection,[155] "centred on women's empowerment".[156] This further increases the competition

[146] "The evidence shows that WFP generated some potentially valuable results for gender. The greatest concentrations of results observed relate to the increased protection of women, men and children in WFP food distributions", *Gender Policy Evaluation* Page ix.

[147] "Objective II: Women, Men, Girls and Boys Affected by Emergencies Benefit Equally from Nutrition and Food Security Assistance According to their Specific Needs and Opportunities and in Safe Conditions."

[148] Interviews with gender focal points in the country offices. When the gender focal point is different from the protection position, the gender focal point can dedicate more time in focusing on gender equality, discharging to the protection focal point the parts that overlap both policies – "Do No Harm", GBV, etc.

[149] Interview with gender focal points and protection focal points: "GBV is a clear link between policies, yes, but this can be particularly problematic." "These are the 'soft issues'". "I am good at gender, maybe at GBV, I will never be good at protection. It is more specific than gender."

[150] Humanitarian advisors and other focal points that share double portfolio protection and gender signified that one of the portfolios will most likely be partially developed. "Positions that are described as 'gender and protection advisers' are always seen as an add-on. It means that in fact none is done adequately." Indeed, requesting the same employees to be both gender and protection focal points do not support adequate gender analyses and responses, or protection risks analyses and responses.

[151] Interview WFP staff in country offices.

[152] Interview WFP focal point gender and protection: "If there is a blockage in gender agenda, I can raise the issue at country management team level or to the country office, because they are accountable for it. Raising issues in protection is more challenging, the protection policy has no leverage."

[153] In Uganda for example, there have been discussions to replace the position "protection and gender focal point" by a "gender focal point".

[154] Interviews WFP staff during the field missions.

[155] "This gender policy complements WFP's Policy on Humanitarian Protection and defines protection as ensuring that food and livelihood assistance does not increase the protection risks of the people receiving it, but rather contributes to their safety, dignity and integrity", WFP Gender Policy 2015, page 6.

[156] "Gender equality and women's empowerment are central to this definition as determinants of the levels and types of risk that people of different sexes and ages are exposed to. Their central importance makes gender and protection cross-

between policies.[157] The focus of protection on gender issues was probably useful to the protection policy development in an initial stage, to reduce internal and external resistance regarding the protection role of WFP.[158] However, it can give the impression that WFP is implementing protection by purely developing gender strategies.[159]

161. Indeed, apart from the "Do No Harm" considerations and accountability to affected populations, WFP protection thinking gravitates mostly around gender, or most precisely, around aspects related to women's protection in various modalities. Issues like gender based violence, transactional sex, SAFE, or girls' participation in school to prevent early marriage are increasingly discussed[160] and partially integrated into programming, which is, in most cases,[161] a positive evolution. However, protection risks related to food security that affect men, young boys or boys, raise much less attention within WFP. For example, the recruitment of boys in school,[162] the forced migration of youth, child labour affecting boys, violence and coercion against men, rarely feature in WFP risk analyses, weakening the protection approach.[163]

162. Another example of the risks of policy overlap can be seen in the merging of accountability to affected populations and protection. While there is a proximity of the objectives, in fact the relationship remains relatively undeveloped, and the overlap is maintained by the two separate indicators for accountability to affected populations and protection, and their identification as cross-cutting results. Staff tend to see one or the other as being the greater priority, and this is reflected in different job descriptions and position titles. The consequence is that the accountability to affected populations reporting, such as complaints and feedback mechanisms, are not reflected in protection reporting.

163. Corporate monitoring and evaluation (M&E) requirements for protection are limited and make it difficult for monitoring and evaluation units to develop systematic reporting. Monitoring and evaluation tools are designed to capture issues that occur in relation to the distribution experience (in most cases), including travel to distribution sites. This tends to be limited to monitoring, and the use of evaluations and reviews of protection-related issues is rare. As explained in section 3.2, despite efforts by WFP to improve its monitoring system, the corporate

cutting issues that should be integrated into all aspects of WFP's work, including as elements of context analyses." Page 6 WFP

[157]The gender unit noted that the approach of the gender policy is to highlight the need to integrate protection concerns into gender analysis of WFP operations and contexts.

[158] According to some of the staff interviewed, labelling protection with "protection of women or children" allowed acceptance on the role of WFP. As a result, for example, WFP could engage firmly in the SAFE approach "to reduce the exposure to protection threats" faced by women and children. "WFP is responsible for ensuring that women and children are not at risk when they gather firewood to cook food WFP provides" The 226-page manual on SAFE was published in 2012.

[159] Based on a partial review of gender strategies and gender action plans at CO and regional level mixes up gender and protection, induced by the gender policy approach on this matter. In Somalia for example, the *Country Gender Action Plan 2017-2020* address two objectives with protection components, including protection mainstreaming. The document highlights "the importance of gender-transformative protection mainstreaming to achieve corporate commitments in promoting gender equality and women's empowerment". The ways to achieve protection objectives are unclear, since the rest of the document does not mention protection. The "organizational changes" that are required according to the document, are not in line with a protection approach: "human resources" refers mainly to parity among staff, "capacity development" refers to gender equality and women's empowerment, "communication and knowledge" refers to a gender baseline study, and the "resources and funding" chapters refer only to gender, not to protection. It is unclear if this gender action plan fills some of the gaps in Somalia (there is no protection action plan) of if the substitution of the protection responsibilities actually weakens the development of a proper protection approach.

[160] The gender office noted that the gender analyses are not being systematically conducted.

[161] Women-centred assistance can jeopardize their protection as it has been observed in many contexts.

[162] In 2015 Evaluation of WFP's 2009 Gender Policy had already observed that "protection of women was interpreted as a proxy for addressing gender concerns, although boys were missing school to attend food distributions and risked attack for doing so."

[163] With the noticeable exemption of Nigeria.

indicators for protection are very much focused on accountability to affected populations and "Do No Harm" outcomes, but are unable to capture other relevant protection outcomes achieved beyond the distribution of assistance. This factor also explains a prominent focus on "Do No Harm" and accountability to affected populations reflected in the annual performance report, where the protection outcomes focused on "ensuring that food assistance is delivered and used in safe, accountable and dignified conditions."[164] Additionally, the corporate formats and procedures foster reporting on quantitative data, making qualitative thinking more difficult.

2.3.2 Internal Factors Related to the Institutional Environment

164. Despite a good acceptance of the new protection focus among staff, the policy has not received sufficient corporate support for more solid top-down and systematic implementation.

165. The gradual nature of the policy development supported the integration of protection and offered a basis for institutional endorsement. Five years after its approval, most WFP staff consulted recognize that a protection focus is needed, and that the involvement of WFP in protection reflects an appropriate understanding of the operational environment. This legitimacy facilitates internal acceptance at field level and is considered to be an opportunity to create empathy and to engage in protection across the organization.[165]

166. At a time when corporate buy-in was needed most, the evaluation could not find any evidence, statement or communication that the protection policy was seen as an institutional priority. Rather, the way in which the core responsibility for food security is defined indicates that assistance is primarily a socio-economic instrument.[166]

167. At field level, most of the senior management interviewed were sensitive to protection issues, to varying degrees, but in the absence of clear directives and reasonable corporate support they were often not in a position to give appropriate attention to the matter.[167] As a result, protection occupied an inconsistent position on the agenda of the country management teams, and was often relegated to technicalities related to distribution activities, but rarely addressed as a strategic concern. Senior management at country office level had limited accountability or incentive to engage in protection: protection issues did not feature in management and staff performance and competency enhancement (PACE) processes. Protection was not mentioned in performance reviews and it was not part of the leadership training.[168] The policy was not highlighted in the induction process for staff.

168. In terms of organizational arrangements, protection creates a new body of knowledge and practice for WFP, and while there has been much interaction through workshops and emailing lists, it has not yet led to the creation of a community of practice. It has not been evaluated in any of the countries of operation in the case studies since the policy was enacted. The only review found by this evaluation was done in Turkey in 2017. There is clearly a dearth of evaluative analysis and learning on protection.

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[164] WFP. 2017. Annual Performance Report 2016. page 61.

[165] Compared to other policies perceived to be imposed by headquarters with a vertical guidance disconnected from the operational priorities, according to key interviewees. WFP Gender policy is often mentioned in this regard.

[166] Based on interviews at field level.

[167] Examples of this have been provided all through the report. This includes, for example, lack of willingness to: prioritize protection trainings (Uganda); support protection focal points with a reasonable portfolio (Somalia); support regional humanitarian advisors; engage in protection advocacy (Niger).

[168] Update on the implementation of the humanitarian protection policy. "Managers in country offices have a responsibility to provide opportunities for staff to build their capacity on protection, ensure that staff have the space and time to integrate protection into their work and hold them accountable for doing so."

169. Five years after the approval of the policy, WFP does not have a protection unit or service that could launch and support the policy implementation. A team of one staff member working on accountability to affected populations and one on protection, among other priorities, in a headquarters of over 1,800[169] people is undoubtedly too little to provide the support required to roll out the protection policy across the highly diverse and challenging operational environments in which WFP works. Yet, as explained in section 3.2, a significant amount of work has been delivered and globally, humanitarian advisors indicated that the technical support provided by the OSZPH was adequate, in view of the very limited resources at their disposal.

170. Protection infrastructure (systems, structure, organization and capacity) at the field level is also insufficient to ensure the implementation of the policy. Protection focal points in particular play a very low-key role. The evaluation could not find a list or headcount of focal points in the countries reviewed and protection focal points often have limited leverage to influence decision-making and implementation. The criteria for the selection of the focal points are not consistent, while their terms of reference are framed to respond to issues, rather than take a programming role. The background and seniority level are not always adequate to fulfil the tasks. The allocated percentage of time dedicated to the protection portfolio, often less than 20 percent, is unrealistic. As a good practice, WFP recently engaged in Nigeria a fixed-term position dedicated to protection, and recruited fixed-term staff in Syria. In other countries with more protracted and well-known protection concerns related to food security, such as Somalia, working time and responsibilities allocated to protection are low.[170]

171. Evidence shows that having dedicated focal points: i) facilitated building capacity at country office level (training); ii) provided operational support internally, particularly to vulnerability assessment and mapping (context analysis); iii) improved WFP support to cooperating partners (partnerships); and iv) facilitated participation of WFP in interagency coordination mechanisms (clusters). The level of influence of these positions depends on the level of support provided by the management and on the profile of the selected person. Overall, however, in the absence of senior management engagement, the impact of focal points in more normative protection approaches, such as advocacy, is very limited.

172. Human resources have been strengthened since 2012 and, in 2017 WFP has established humanitarian advisors for each of the six regional bureaux, in addition to the team in headquarters. However, most of these positions are temporary and many are not fully dedicated to protection. Moreover, consultations showed that regional humanitarian advisors are not always provided with coherent support from the regional management in terms of resources and priority for travelling, which makes their tasks difficult to achieve.

173. The contribution of stand-by partners to operationalizing the protection policy was particularly relevant to guide the first stages of policy implementation. The policy expected to exploit the use of stand-by partners from the outset in order to mobilise the necessary technical support for WFP.[171] From 2012 to 2016, 41 international protection advisers were deployed, which is small compared to the WFP workforce. Most of these positions – 78 percent – were appointed at country office level, 17 percent were regional advisors and 5 percent were based at headquarters.[172] Although stand-by partners were expected over the longer term to be mainly

[169] 1686 staff in Rome's HQ and 1820 including support offices in Europe and USA.

[170] Programme officer ToR in charge of protection in Somalia indicate that: the "purpose assignment" is "to support the joint resilience programme with FAO and UNICEF" and "to support the capacity building programme with the government of Somalia" as well as "being the key focal point in Somalia for implementing the WFP Integrated Road Map". Protection is not mentioned among its objectives. The position has in total nine tasks, of which only one, listed in number nine, is "Gender - protection focal point" (not even protection).

[171] HPP paragraph 67

[172] Calculations by the evaluation team on information provided by OSZPH.

deployed at headquarters and regional bureaux "to support country offices already integrating protection and to guide the expansion of policy implementation",[173] in 2016 almost all the positions were field based.

174. However, at field level, in addition to contributing to a more technical background, stand-by partners' terms of reference often turn into catch-all positions covering other portfolios, compared to those of internal WFP staff.[174] Still, although the use of stand-by partners has undoubtedly been a positive strategy to provide protection expertise and to support technical development, the systematic outsourcing does not cover WFP responsibility to develop its own protection expertise and to ensure appropriate staffing. The 2014 update to the protection policy in fact states that retaining appropriate staff is a key challenge. The evaluation found that personnel rotations in this function were very prevalent, with none having more than two years in the same position.

2.3.3 External Factors that Affected the Implementation of the Policy

Figure 9: Findings on external influencing factors

EXTERNAL FACTORS	
Enabling	Donor support
	Partnership and coordination
Constraining	Relationship with government and local authorities, parties to conflict
	Funding has not been correlated to the implementation of the policy

Source: Evaluation team

175. Key donors have argued, from the outset that WFP should adopt and implement a protection agenda.[175] The evaluation found that donors were consistently expecting greater integration of protection into WFP analysis and programming. Interviews at country level showed donor willingness to fund dedicated positions and support specific activities for protection.[176] On the other hand, as WFP is not collecting information or analysing protection systematically, donors cannot be made aware of the full value of WFP interventions, including in cash based transfers.[177] Programmes with relevant protection impact, such as emergency school feeding in Uganda, had to be shut down because of the lack of funding.

176. Integrating protection could be seen as an opportunity to mobilize donor support. As explained in section 2.1, attention to protection issues equips WFP with an improved capacity to face changes in the operational environment. Indeed, the comparative advantage of WFP is high in the context of "protection crises",[178] where violence, deprivation and coercion generate food insecurity and where food-insecurity contributes to protection risks and gaps. The WFP approach in Nigeria highlights the greater awareness and potentialities. In such settings, where WFP fully takes on a role in protection, there is a higher recognition of WFP capacities by the population and

[173] HPP Policy update. paragraph 39.
[174] According to staff interviewed in the field. The evaluation team does not have enough elements to verify other comparative advantages.
[175] Mainly SIDA and ECHO.
[176] Uganda ECHO, Nigeria DFID, Niger ECHO, El Salvador. Some country offices interviewed indicated that a donor's willingness to support protection positions is not translated into additional funds for WFP. Yet, this view shows that within the available budget folder, protection does not constitute a priority for WFP country offices.
[177] In Uganda, aspects related to dignity and integrity in cash based transfer (CBT) modality could have been further analyzed and pointed out to raise more attention – and support - from donors. This included effects in household responsibilities, links with domestic violence, minimization of delays, access to a greater variety of fresh products, costs of transportation, advantages of the verification process, etc.). WFP staff recognized in the discussions with the evaluators that raising these issues could have been very useful to support WFP advocacy on CBT (in Uganda for example).
[178] Nigeria is often labeled as a "protection crisis" by WFP but in conflict-affected areas all crises are protection crises. Indeed, all crises, whatever their nature, have a protection dimension.

by the humanitarian community: "this is a horrific conflict, where hunger is a cruel weapon and where food is instrumentalized by armed actors. Protection cannot be thought of any more in terms of ensuring that there is some shade in the distribution points."[179]

Partnership with Governments

177. Strategic alliances and partnerships with governments have at times also constrained WFP in relation to the policy implementation. Unlike other policies, for example in relation to gender equality,[180] protection tends to be a lesser priority for most governments. A number of senior managers highlighted the risk of damaging relationships with governments, and so negatively impacting on operations. They stated that this had in some cases conditioned the protection advocacy approach of WFP.[181] WFP uses its influence primarily to ensure delivery of assistance to affected populations, and this does not always allow for broader advocacy.

178. The alignment with Sustainable Development Goals and national priorities, such as school feeding, is positive for affected populations, but WFP ability and determination to influence national policies and practices in relation to protection concerns was found to be variable.[182] This can be especially problematic in countries where issues of poor governance are common. As shown in Section 2.1, working with government has in many countries also constrained the ability of WFP to develop independent risk analysis on issues related to protection.

Coordination

179. As indicated in Section 2.2, the evaluation found that WFP became an active member in some protection clusters and working groups at field and global level.[183] The participation of WFP in protection fora connected it with a range of cluster partners, while it sought common approaches and solutions for protection issues. [184] This involvement supported a positive view of WFP, countering perceptions of it being primarily focused on logistics and food.

180. The involvement of WFP in a number of interagency protection workshops[185] and studies[186] on protection-related issues was also considered to be a positive empowering factor to improve knowledge and integrate protection into WFP programming. Yet, some staff spoke of a fear of

[179] Nigeria. Interview with WFP staff.

[180] For example, the gender policy evaluation found that "By far the major driver for WFP's gender work at field level is the national context on gender – including national priorities, policies and plans; the national and United Nations development co-operation architecture and the engagement of WFP within these; the immediate gender needs confronting WFP from its beneficiaries; the political economy features of the environment (including decentralisation); and the good relationships WFP has with its partners, whether government, donor or civil society." *Evaluation of WFP 2009 Gender Policy* January 2014. *This Time Around?* Page 40.

[181] This was found in 3 of the 12 countries studied.

[182] In Uganda, the ability of WFP to influence the – as yet nonexistent - national policy on school feeding was questioned by internal staff and external partners. In Niger, however, WFP showed its capacity to support the design and development of a policy in school feeding programmes.

[183] "Global Protection Cluster (GPC) Technical Working Group (TWG), GPC protection priority task team (TT), GPC protection mainstreaming TT, GBV AOR, Call to Action to end sexual violence, Human Rights Upfront, UNDG Human Rights Working Group, gFSC, IASC AAP/PSEA TT, CDA, ProCap Steering Committee Observers". Source OZSPH.

[184] UNHCR staff in different CO used the same expression to define WFP engagement in protection and protection forum: "now we speak the same language".

[185] Workshop on "Good Practices and Lessons Learned on Protection in Cash-based Interventions" conducted in Somalia in May 2017, organized by the global protection cluster and the protection cluster.

186 "Examining Protection and Gender in Cash and Voucher Transfers. Case Studies of the WFP and UNHCR Assistance." Or "Hunger Without Borders – A Preliminary Study on Migration, Violence and Food Insecurity in Central America Northern Triangle", WFP, IOM, 2016.

treading on other agencies' mandates, which means that some issues have not been dealt with effectively.

181. The evaluation notes that participation in mapping or assessment exercises led by the protection cluster or by protection specialized agencies, such as the UNHCR, has not always advanced the integration of protection into WFP analysis. Participation in joint assessments do not automatically trigger a better understanding or stronger involvement of WFP into protection when joint assessments are carried out with a focus on fragmented specialization. For example, WFP contributes with its food security analysis and UNHCR provides the protection vision.[187]

182. As described in Section 3.2, the capacities of cooperating partners are highly variable. Several of these partners have long experience in addressing protection concerns and in undertaking protection programming. Strong partnerships support WFP engagement in protection, such as in Nigeria. Most of these partners appreciate WFP involvement in protection but do not yet see WFP as a solid protection partner and this can hinder the transfer of knowledge.[188] At the opposite end of the spectrum, low awareness and capacity of some national cooperating partners in terms of a comprehensive understanding of protection and its various dimensions constrain a protection approach.

183. Regardless of the partners' capacities in protection, interactions with WFP protection focal points are highly valuable for cooperating partners. According to cooperating partners interviewed in the field, the partners felt better supported and understood when WFP had an active protection focal point.[189] In some cases, WFP is even perceived as having placed positive pressure on NGOs at the field level to mainstream protection (improving participation, vulnerability approaches, complaints and feedback mechanisms, and safety during distribution). The integration of the protection policy into field level agreements in some instances is also indicative of WFP efforts to hold its partners accountable for protection[190] – though this has suffered from weak follow-up.[191]

Funding

184. Inadequate resources hampered policy implementation. Financial information related to the level of funding for the policy and actions plans implementation was limited.[192] It should be noted that protection can ultimately be supported through a wide variety of sources and aims to be mainstreamed in the way in which programming is done. However, in view of the small size of

187 In some country offices, protection is still considered as a "UNHCR expertise" and therefore delegated to them, undermining the connections between food insecurity and protection issues. This is not only a WFP issue. United Nations agencies have been reluctant to see WFP associated with protection in some countries. "When we approached the Protection Cluster to be part of it they told us, what for? You are WFP! Most of the agencies at the HCT showed resistance". Interview with WFP country office senior management.

188 In some contexts, NGOs can be reluctant to have visible partnerships with WFP because of the linkages of United Nations agencies with the host authorities.

189 As indicated earlier, interviews in the field show that partners appreciate having an interlocutor that "speaks protection" –in particular with the protection focal point - and has a better interpretation of working in conflict-sensitive areas. Cooperating partners also appreciate having a focal point on protection to whom they can refer and ask for guidance in technical aspects of the implementation.

190 In Niger, FLAs include an attachment with the protection policy document and detailed guidelines to ensure AAP, safety, dignity and integrity during food distributions. In Uganda, WFP has promoted the engagement of NGOs in protection

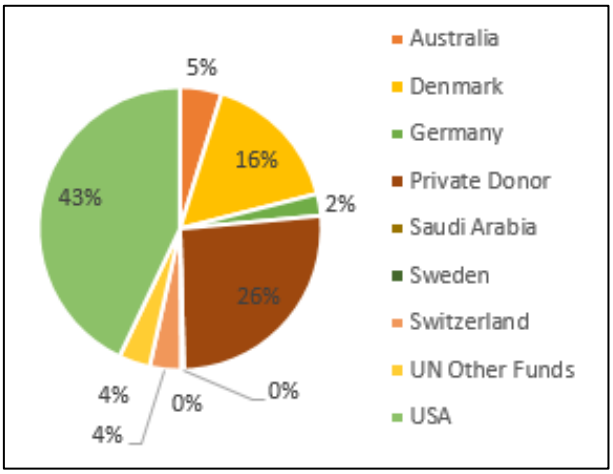
191 As described in section 2.2., the follow up of a high number of FLAs – Somalia country office has over a thousand for example - is challenging.

192 The financial requirements of phases one and two (2012-2015) were initially estimated at USD 6.96 million to be resourced through extra budgetary contributions and multilateral funds. The policy update does not provide any data on expenditure or levels or resources. The cost of implementing the strategy over the period 2015-2016 was estimated at USD 5,901,746 which makes a total estimated cost of USD 12,861,746.

the headquarters team and considering the constraints evidenced above, insufficient funding was one factor that hampered the acquisition of dedicated protection personnel across the organization.

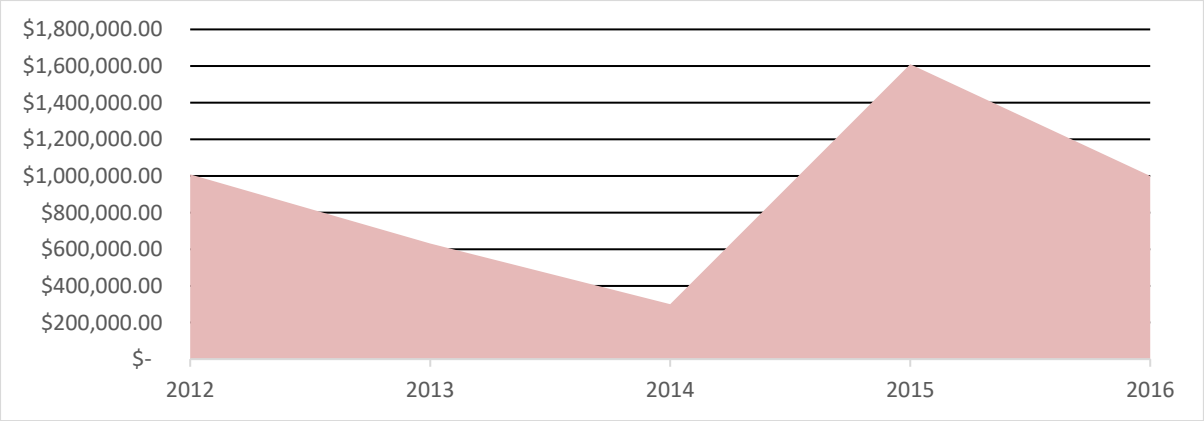
185. At headquarter level, the available financial information from OSZPH, displayed in Figure 10, shows that between 2012 and 2016, the major bilateral contributors to the Trust Fund for Humanitarian Protection Project III (THPP) were the United States and Denmark.[193]

Figure 10: Donor contributions to the THPP since 2012



Source: Evaluation team, based on OSZPH, extract contributions report

Figure 11: Donor contribution to the THPP since 2012 (in USD)

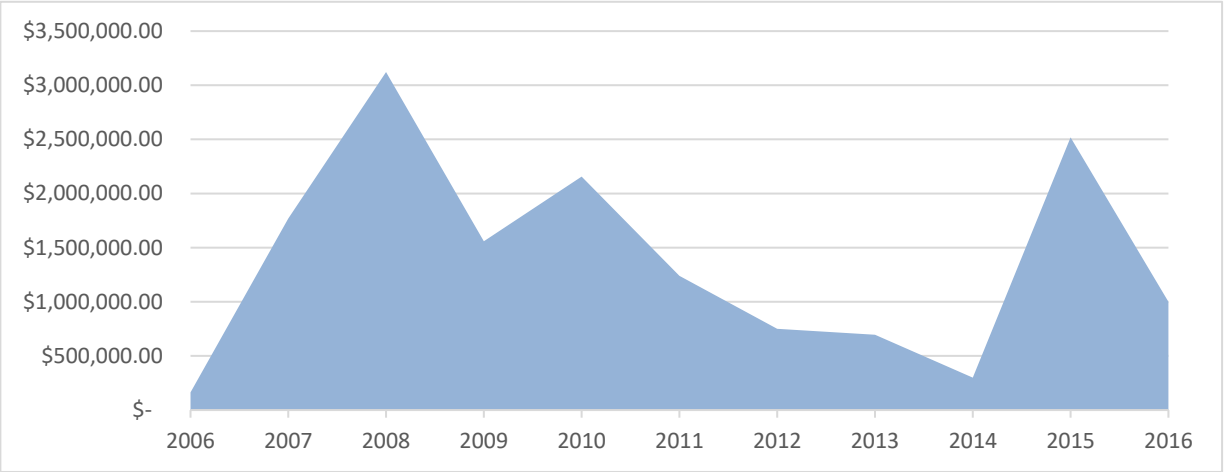


Source: Evaluation team, based on OSZPH, extract from Government Partnership Division (PGG) contributions report

186. Based on Figure 11, some variation is observed in the contributions to the THPP between the adoption of the protection policy in 2012 and 2016. This is an important gap in terms of timing – at the launch and roll-out of the policy, funding was critically low. The trend is the opposite to what would be expected for a new and important policy.

[193] It is important to mention that donor contributions to the THPP are made for protection together with AAP and do not distinguish protection-specific contributions. Additionally, no separate analysis is carried out with regards to protection and AAP.

Figure 12: Total contributions to THPP between 2006 and 2016 in USD



Source: Evaluation team, based on OSZPH, extract from PGG contributions report

Figure 13: Total contributions to THPP between 2006 and 2016 in USD versus Number of donors per year

Source: Evaluation team, based on OSZPH, extract contributions report

187. In this graph, it can be seen that the number of donors committed to protection in each year is not necessarily related to the amount of funding WFP received for this cause. Such is the case in 2008 and 2011. It is also interesting to see that the number of donors that contributed to protection is, in many cases, very small.

Table 7: Evolution of donor contributions to THPP between 2006 and 2016 in USD

Donor	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total general
Australia	393,701				1,747,967	-						2,141,668
Denmark		929,550		1,012,146								1,941,696
Germany										327,869		327,869
Private Donors					64,784	20,286				263,888		348,958
Saudi Arabia			2,218,505									2,218,505
Sweden		148,809										148,809
Switzerland		163,935	138,249	147,059	43,228		258,799	330,761		1,326,223		2,408,254
United Nations other funds and agencies (excl. CERF)								64,200				64,200
USA		527,000	765,000	400.,000	500,500	1.218.950	750,000	300,000	300,000	600,000	1,000,000	6,361,450
Total	**393,701**	**1,769,294**	**3,121,754**	**1,559,205**	**2,356,479**	**1,239,236**	**1,008,799**	**694,961**	**300,000**	**2,517,980**	**1,000,000**	**15,961,409**

Note: Higher contributions considering the 2006-2016 period of analysis are presented in shades of green, medium ones in yellow and smaller contributions are presented in shades of red.

Source: Evaluation team, based on OSZPH, extract contributions report

188. Table 5 shows that there are some donors committed to protection throughout the years and some who have funded THPP projects sporadically. The latter does not necessarily mean that their contribution was small, in fact Saudi Arabia only funded protection in 2008, but its contribution is the third largest received for THPP projects in the last 10 years, after the United States of America and Switzerland.

189. A full overview of levels of funding specifically for protection was not available. Expenditure data at country office level was also difficult to track,[194] but most of the senior management interviewed openly recognize that investing beyond training in protection expertise does not constitute a priority. The protection policy states that: "costs for protection-related support will be included with other direct operational costs and direct support costs of future operations, which may be supplemented by a headquarters-managed trust fund for protection in WFP operations."[195] Although this statement encourages country offices to allocate specific funds to protection, there is no earmarked disaggregated budget line. Therefore, cost analysis is not possible and this leads to a lack of clarity at the operational level as there is no clear understanding of the amounts spent on protection.

[194] OSZPH strategy pointed out that "programme adjustments, review, or the costs of running a CFM are new to many CO and not yet earmarked in budgets at the CO level".
[195] WFP. 2012. Humanitarian Protection Policy. Paragraph 68

3. Conclusions and Recommendations

3.1. Conclusions

3.1.1 Quality of the Policy

201. WFP developed its policy in light of global policy discussions on the importance of protection for crisis-affected populations, and the growing attention given to human rights. It decided that protection should be applied across all its activities. At the same time, senior management at WFP dedicated less attention to protection in contrast to some other policies, and it was not able to provide resources at a scale that would justify the priority it is given in the protection policy.

202. The policy has been communicated across WFP, with most staff being aware of the general importance of protection. Ambiguities in the policy guidance, as well as in auxiliary training materials, were initially useful in allowing WFP to define its posture in the fields of protection and human-rights standards.

203. In terms of implementation, this approach succeeded in some areas, but gave rise to problems on the analytical side, and in the translation of norms into practice. This was due, in part, to the tension in the definition (as discussed in 2.1.1) and lack of strategic vision and management support associated with protection.

204. The protection policy allowed the development of a significant body of knowledge in terms of training, guidance material, and created links to other policies and guidelines. WFP staff state that protection is important, however there is still considerable confusion about what "protection" means in practice. Lack of clarity and in-house consensus on WFP protection responsibilities have contributed to the basic concept of protection being fragmented, leading to low prioritization of the policy and subordinated documents.

205. WFP launched, in the Integrated Road Map, a process that places protection as one of three cross-cutting corporate results alongside accountability to affected populations and partnerships.[196] The 2030 Agenda for Sustainable Development goals highlight the interconnections between human rights and various aspects of development. This allows WFP to make the case that there is a virtuous circle between the promotion of human rights and the enjoyment of food security.

206. Within WFP, the emerging focus on risk management, including risk to populations, offers the potential to create a stronger and more corporate focus on protection. However, the restructuring and streamlining of objectives risks leaving protection aside and points to institutional constraints, as can be seen in the drafting of country strategic plans, where cross-cutting results are not mentioned although they are part of the corporate results framework.

207. This evaluation also found that a combination of factors enlarged the space for a more rigorous protection policy and corporate commitment in the future. These factors included: insights and experience gained to-date; the number of crises with significant protection challenges; growing awareness within WFP of the relationship between protective programming and effectiveness; and technological changes.

[196] The count of two or three cross-cutting results depends on whether accountability to affected populations is considered a protection outcome. Assuming a differentiation between gender and protection and that the latter encompasses AAP would indicate three fundamental cross-cutting result categories: partnerships, gender and protection (which would include all communication with communities and other forms of accountability).

3.1.2 Policy Results

208. Significant results have been achieved, and there are innovative ways in which WFP is delivering food assistance. This goes beyond what WFP reporting would suggest. Yet the tensions between the protection definitions in the policy have, over time, not generated systematic attention to strategic level issues, including, for example, when food is used as an instrument of power. The evaluation found that the protection policy was mostly guided by the implementation plan, which focused on capacity development. The bulk of WFP efforts to address protection risks occurred at the operational level and were centred on achieving change at the level of tools and guidance material.

209. This evaluation showed that WFP was successfully supporting protection-centred capacity development processes in a wide range of geographic and thematic contexts, with new organizational support, resources, guidance and tools. There was a significant demand for training and improved capacity, which was a positive indication of staff interest in addressing protection issues.

210. The evidence of change over the past five years in WFP shows that protection can be seen in conjunction with other policies and guidelines, such as peace-building, data protection, "Do No Harm", and accountability to affected populations, in a relationship that will gain by being acknowledged and strengthened. At the corporate level, the common framework can become the concept of risks to populations, placed on a par with risks to operations and reputation.

211. In a number of countries, reporting, including from cooperating partners, contained significant information about protection, both in terms of actual problems and risks as well as opportunities for the affected populations. Yet, limited use is made of this information. An example of this would be in country strategic plans, where cross-cutting results are not mentioned although they are part of the corporate results framework.

212. At the same time, there are increasing implications for the protection of the beneficiaries regarding the handling of this information. This is relevant particularly because the information is becoming broader and more specific about individuals and about events and places. Such information is of potential interest to human-rights violators, as well as to commercial interests. The pooling of information is not keeping pace with the growing ability of the organization to track change in beneficiary populations and even in non-beneficiary but affected populations.

213. There is considerable fragmentation of available information about actual protection outcomes achieved, and a corresponding lack of appreciation of the available opportunities to enhance protection. Information on protection-related outputs and outcomes is not centralized and used in a unified way. There is limited data or reflection on protection problems caused by actions or inactions by WFP. There has been a conflation of protection and gender concerns in many instances.

214. Another disconnect occurs at the level of the cooperating partners, and to some extent, of service providers. The partnerships do not systematically reflect protection considerations. This is all the more striking as these service providers (such as shops or credit card companies) are increasingly in touch with populations of concern. There is an arms-length relationship between WFP and its partners, which limits the latter's ability to perform a protection role for which many are well qualified.

3.1.3. Factors that Affect Performance

215. Considerable work and best practices have been generated within WFP programmes, which allow WFP to play a significant role in protection. This is enhanced by the operational flexibility of WFP and its decentralised management, as well as its extensive presence in the field. WFP field

presence gives the organisation a comparative advantage not only in relation to other United Nations agencies and to cooperating partners, but also in relation to its suppliers – which play an increasingly important role.

216. Protection has been introduced progressively into WFP, by shifting the focus of programming to beneficiary groups. The implementation of the policy was inclusive. The primary factor affecting results was the low priority given to protection at the corporate level. Its apparent overcrowding of policy was matched by an insufficiency of personnel capacity. Protection is still considered to be a risk, in terms of relations to governments, and the benefits of protection to WFP operations has not been made explicit. The lack of leadership and corporate endorsement prevented the organization from capturing opportunities that could have enhanced the reputation of WFP in relation to protection matters and reduced other corporate risks.[197]

217. Inter-linkages with the gender policy have both benefited and constrained the implementation of the protection policy. There is a potentially negative overlap. Dual responsibilities and differing accountability levels have affected implementation. There were significant lessons drawn from the gender policy implementation that could have been replicated, as mentioned in 2.3.1. This demonstrates the need for a greater distinction between gender and protection, but also clearer linkages to policies about risks to populations.

218. Two significant internal factors, however, constrained the implementation of the policy. The first relates to the diffuse normative framework made up of a large number of policies with varying degrees of relevance to protection, which make protection more difficult to grasp by WFP staff. The second factor is the lack of clear and explicit corporate support for protection, which means that engagement often depends on the personality and motivations of specific managers on the ground. These factors are compounded by limited human resources and the lack of a common vision and protection evidence base.

3.2. Lessons Learned

219. Transformational change is taking place within WFP to align its results to the Sustainable Development Goals. The significant work undertaken over the past five years by OSZPH, regional advisers and country office focal points, has awakened the interest of WFP staff and partners in protection. There are now networks that exist to promote protection as an element of programming. This is matched by the emergence of risk management as a central management tool for WFP. The risk appetite includes a section on risk to populations, with the potential of linking this priority to the protection of WFP operations.

220. Building on WFP strengths in understanding the field reality of populations affected by vulnerability or emergencies is increasingly important. Food security and partnerships are clearly seen within WFP as being linked to protection, which is well conceptualised as a cross-cutting result, alongside gender. The evaluation found a number of good practices in protection that deserve to be documented, and that could be brought together into a coherent framework.

221. WFP strengths, as noted in the Annual Evaluation Report 2016, lie in developing innovative practices in the field, including the ability to achieve important outcomes for the beneficiary populations, often in extremely challenging contexts.

222. The evaluation found multiple examples of programming with positive protection implications associated with three unrelated factors. The first factor included the development of new modalities, such as cash based transfers, or older activities like food assistance for assets, which provided the beneficiaries with more 'agency'. The second factor was the increasing ability of WFP and partners to interact with those selected for assistance through means such as SCOPE,

[197] Such as "Inability to meet humanitarian commitments" or "Inability to adapt to global shifts".

(for the registration of beneficiaries), m-VAM and the complaints and feedback mechanism. The third factor is simply the energy and inventiveness of some country office staff (as shown by many of the country office-specific efforts mentioned in Section 3), whether they are engaged in a dialogue with the authorities or dealing with cooperating partners or service providers. To meet the policy's aspirations, protection can now be placed in a more long-term approach to programming, moving beyond a protection-sensitivity ethos, and more closely related to core programming objectives. The policy is aligned to international norms, and applies across all WFP operations, whether emergencies or development. WFP needs to learn, with a good degree of accuracy, what may be exacerbating vulnerabilities and threats, especially in protections terms, and how immediate food-security focused programming may affect short and medium-term vulnerabilities and protection issues.

223. Such progress will require a considerable change in context analysis and personnel, and in the authority given to personnel by senior management. It is possible to integrate protection considerations from initial contextual analysis and needs assessments to monitoring and evaluating. This evaluation indicates that WFP can implement the ensuing recommendations as part of a change-management programme that can instil the systemic and behavioural changes necessary to ensure that the policy guides all aspects of WFP programming.

3.3. Recommendations

224. The recommendations below revolve around the need to realign the priority given to protection within WFP, and within the Integrated Road Map, with an increase in resources and a robust accountability framework.

225. **Recommendation 1: A New Policy**

WFP should in 2018 formally affirm and in later years regularly reaffirm that protection of, and accountability to, affected populations are among its core responsibilities in playing its role in food security and partnerships (SDGs 2 and 17).

By 2019, WFP should prepare a new humanitarian protection policy. The new policy should have a single objective that encompasses all populations affected by crisis and vulnerability – in both emergency and development settings – and that reflects the IASC definition of protection.

In particular, the policy should:

a) Define a role for the reduction of the risks for populations affecting their safety, integrity and dignity, through negotiation, and positive measures that create an environment that promotes basic human rights

b) Clearly articulate linkages to all related policies, strategies and guidelines that address risks to populations, including peace-building, gender and accountability to affected populations

Include a formal framework for accountability, separately from gender, that clearly assigns accountability and responsibility for protection at all organizational levels (from Executive Director to protection advisers) and within country offices.

226. **Recommendation 2: Integration into Risk Management**

By 2019, the Enterprise Risk Management Division should ensure that the corporate "line of sight" clarifies the links between risks and programming for protection. A WFP-wide risk and protection framework should be developed to include both risks to populations and programming objectives.

The framework should cover the whole of WFP work as follows:

a) The definition of risks to populations, and risks to reputation, should be broadened in the internal control frameworks (risk appetite, risk register, policies) to explicitly refer to protection-related concepts of dignity, integrity and security/safety across a spectrum of contexts from emergency to development, when significant groups of vulnerable populations require protection.

b) The security risk management system should take protection aspects and assessments into consideration to address delivery-generated risks, the level of acceptance of WFP operations by affected or assisted populations, and measures taken that increase the opportunities for positive protection outcomes.

c) Specific country office level training should be delivered with the objective of building senior staff skills, in very practical context-specific terms, to identify and report protection-related risks, and explain how these are addressed.

227. **Recommendation 3: Partnerships**

By the end of 2018, the Partnership, Governance and Advocacy Department and the Policy and Programme Division should develop a formal approach to resource mobilization to support the achievement of cross-cutting protection results.

In particular:

a) WFP should focus on its comparative advantage to develop a strategic engagement towards donors, to increase voluntary funding for the protection function within WFP programmes, including the Trust Fund for Humanitarian Protection Project III.

b) United Nations partners and clusters, cooperating partners and commercial suppliers should be given communication material that highlights the new cross-cutting nature of protection, and the ways in which it informs WFP programming, such as in cash based transfers.

c) WFP should develop guidelines for cooperating partners and commercial suppliers that increase the profile of existing clauses in agreements concerning protection. This should focus particularly on data collection, on reporting systems and safeguards, and on the promotion of messages towards beneficiaries and vulnerable and affected populations.

228. **Recommendation 4: Leadership and Human Resources**

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.

The following new measures are required:

a) Additional funding should be allocated by WFP to protection and humanitarian advisers, in addition to voluntary funding. The cross-cutting functions of focal points and advisers in country offices and regional offices for gender and protection should be separated.

b) Training should be developed that is more practical for field staff and focused on effective programming. This should enhance WFP management staff capacities on protection at headquarter and country office level, including integration of the protection policy in leadership training, in induction processes, and in PACE. Senior staff should be assessed for skills relevant to protection analysis and negotiation and receive training on dialogue with authorities and non-state armed groups.

c) Country office protection focal points should be formalized, meaning that they should be identified on the basis of clear criteria, be senior, and be listed in OSZPH to benefit from internal knowledge management.

229. **Recommendation 5: Evidence Base**

By the end of 2018, WFP should strengthen its analysis of contexts and protection issues by reinforcing the data systems for monitoring and evaluation and building on existing information management systems to capture protection-related information.

This should build in the following way on existing processes:

a) The elaboration of an information platform within the IT beneficiary service unit (RMTB) should include a protection information "big data" pool that combines the qualitative and quantitative information currently gathered through the wide range of WFP assessment tools and methods. This would serve as the institutional framework to analyse, monitor and address data protection risks. The first step would be to carry out an inventory of protection data-collection tools and scan their content to organize the storage of data.

b) The corporate indicators should be revised to cover quantifiable elements relating to risk to the overall population of concern, not only to beneficiary groups.

c) Evaluation terms of reference should include more systematic protection analysis in a way that reflects its status as a cross-cutting result.

230. **Recommendation 6: Stakeholder Dialogue**

By the end of 2019, the Programme and Policy Division should develop a new strategy for engagement with affected populations and vulnerable groups, which should be based on strengthened community feedback mechanisms.

This should include face-to-face two-way communication in ways that reassure respondents that their interests will be understood. It should also include digital communications that allow for information to be brought together. This will strengthen dialogue with the population, which will, in turn, strengthen all WFP programming.

Photo Credit

Cover Photo: WFP/Shehzad Noorani

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