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WFP protection and accountability policy

Executive summary

Approved by the Executive Board in 2012, the first WFP humanitarian protection policy set out to embed protection in the organization's work in conflict situations and disaster response in order to improve the impact of food assistance on people whose rights are threatened by violations and abuses. During implementation of the policy, WFP recognized the importance of applying the human rights and protection normative framework beyond humanitarian response. It also recognized that its role is to identify protection risks and take all means to mitigate them when responding. With this policy update, WFP acknowledges that it is required to prevent and respond to protection risks associated with hunger and WFP programmes in all contexts and to craft successful protection outcomes for affected populations. In turn, WFP further seeks to more effectively integrate protection considerations with its accountability to affected populations.

Accountability to affected populations is a necessary condition for attaining this objective and for its efforts to achieve Sustainable Development Goal 2: End hunger, achieve food security and improved nutrition, and promote sustainable agriculture. Systematic engagement with affected populations, internal and external accountability measures and inclusion – essential to meeting WFP's strategic objectives and its requirements under the United Nations foundational pillars of human rights, peace and security, and development – means ensuring that affected communities, especially individuals most at risk, have a role in shaping and informing humanitarian and development action.

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The 2020 protection and accountability policy aims to translate the protection framework into action. The policy represents a shift in WFP's approach to planning the design and delivery of its programmes. It fosters the integration of protection and accountability across a range of functions critical to WFP operations so as to ensure that food assistance is safe, appropriate and received in a dignified manner.

In practice, making protection and accountability central to WFP operations is simply good programming because it increases the quality of WFP programmes and the likelihood that they will have a positive impact. In turn, successful programmes based on strategic partnerships lay the foundation for achieving long-term development outcomes as defined in the Sustainable Development Goals. Equally, an explicit focus on protection and accountability reduces the risk of negative outcomes for people, embodying the principle of "do no harm".

Effective humanitarian and development responses are predicated on acknowledging the role and participation of those that WFP serves. WFP's work is therefore only as good as its institutional capacity to listen to the voices of the most vulnerable and adapt its efforts in response to mitigate the risks to which they are exposed.

Draft decision*

The Board approves the WFP protection and accountability policy (WFP/EB.2/2020/4-A/1/Rev.2).

For the policy's successful implementation, sufficient financial resources are required at the corporate, regional and country levels. WFP commits to providing an implementation plan with an estimated budget for consideration by the Board no later than its 2021 annual session. This will include a notional allocation of estimated costs across appropriate funding sources including the programme support and administrative budget, country portfolio budgets, and extra-budgetary support.

* This is a draft decision. For the final decision adopted by the Board, please refer to the decisions and recommendations document issued at the end of the session.

Purpose and rationale

1. WFP's 2020 protection and accountability policy is the successor to its 2012 humanitarian protection policy, which has been updated in response to evolving needs and based on recommendations from a 2018 thematic evaluation of the policy.¹ Protection is understood as activities that aim to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities. Through the protection and accountability policy WFP commits to preventing and responding to protection risks associated with hunger in all contexts and to achieving successful protection outcomes for the people it assists. WFP's proximity to affected populations gives it the capacity and the responsibility to support positive protection outcomes. This policy is framed under the three foundational pillars of the United Nations: human rights², peace and security, and development.
2. WFP seeks to integrate protection considerations with its accountability to affected populations (AAP). Ensuring AAP throughout WFP programmes and operations is central to organizational efforts to meet food needs in a safe, accountable and dignified manner that respects the integrity of the people served. Translating policy into action will require putting affected populations at the centre of programme planning and delivery and ensuring that their voices influence WFP decisions and actions. This will further strengthen WFP's ability to support and promote people's own capacity to address the risks to which they are exposed.
3. Given its size, the scope of its activities, its operational footprint and its partnerships to meet emergency needs, build resilient communities and promote food security, WFP's role varies from one context to another. In many situations, WFP delivers food assistance directly; in others, it seeks to strengthen existing systems or takes part in advocacy coalitions. Successful protection outcomes rely on the combined action of many actors. This policy enables WFP to better define protection risks and needs and the role it can most effectively play, in partnership, in a given context.
4. The 2018 evaluation called for improved data collection and analysis, partnerships and stakeholder engagement and strengthened risk management, supported by sufficient human and financial resources, strong leadership and a clear policy framework. Following the evaluation WFP developed a three-year protection strategy, which is still in place.³ With the implementation of this new policy WFP will continue the work begun under the strategy and supplement it with detailed guidance, indicators relating to data collection, analysis tools and select activities.
5. A robust consultation process underpins this policy, including engagement with affected populations in various settings, with practitioners in the field from the United Nations and non-governmental organizations (NGOs) and with a wide range of other stakeholders, including host governments at the national and local levels, donors and the WFP Executive Board. Like its predecessor, this policy is grounded in international human rights, humanitarian and refugee law and informed by the Inter-Agency Standing Committee (IASC)

¹ See the annex for a summary of the recommendations. The summary evaluation report (WFP/EB.A/2018/7-B) is available at <https://docs.wfp.org/api/documents/WFP-000070461/download/>.

² It also aligns with the Call to Action for Human Rights: https://www.un.org/sg/sites/www.un.org.sg/files/atoms/files/The_Highest_Aspiration_A_Call_To_Action_For_Human_Rights_English.pdf.

³ WFP. 2019. *Strategy for Protection and Accountability to Affected People (2019–2021)*. <https://docs.wfp.org/api/documents/WFP-000011132/download/>.

statement on the Centrality of Protection in Humanitarian Action and subsequent policy, which includes the following statement:⁴

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

6. This policy is also grounded in the 2030 Agenda for Sustainable Development aim of “leaving no one behind” and the WFP Strategic Plan (2017–2021),⁵ and it will inform the forthcoming corporate strategic direction.
7. There is a deliberate shift from the 2012 WFP humanitarian protection policy to this revised policy with regard to the centrality of assistance. WFP will focus not only on how it provides assistance in order to “do no harm” but also on how its decision making and related programming is strategically designed for, received by and perceived by affected populations and the impact that programmes have on addressing protection risks. The new level of ambition laid out in this policy will require WFP to have the tools and resources in place to enhance the protection of affected populations in all contexts.

Definitions

8. The 2018 evaluation flagged the need to define and clarify protection concepts to enable WFP decision makers and practitioners to better design and operationalize programmes that yield satisfactory protection outcomes. The following definitions form the basis of the protection and accountability policy and its implementation.

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

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

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

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

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

⁴ Inter-Agency Standing Committee. 2013. *Statement: The centrality of protection in humanitarian action*. https://interagencystandingcommittee.org/system/files/the_centrality_of_protection_in_humanitarian_action_english_.pdf and Inter-Agency Standing Committee. 2016. *Policy on protection in humanitarian action*. <https://interagencystandingcommittee.org/protection-priority-global-protection-cluster/documents/iasc-policy-protection-humanitarian-action>.

⁵ WFP. 2017. *WFP Strategic Plan (2017–2021)*. <https://docs.wfp.org/api/documents/WFP-0000019573/download>.

Dignity:⁶ The respect due to affected persons, including their inherent worth, identity and culture. WFP employees, from field monitors to country representatives, and partners must fully understand the diverse cultural and other needs of the people with whom they work and serve and the need to provide assistance respectfully. This means that affected people have the right to receive assistance that will empower them and pave their way to new opportunities, as opposed to reliance on external support or the adoption of degrading survival mechanisms. It also means that sensitivity and responsiveness to the identity and culture of affected populations must be fully integrated into the mechanisms through which food assistance is provided by WFP and its partners to affected people.

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

Integrity:⁷ Actions and efforts that are – to the degree possible – holistic and implemented responsibly in ways that reduce protection risks and foster trust and reciprocity with the affected populations served by WFP.

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

Obligation to do no harm:⁸ Anyone working in fragile settings or with people in vulnerable situations has a duty not to put them at risk of negative consequences or to increase their vulnerability to, among other things, retaliation from governments, clans, factions and families, loss of income or stigma. In addition, it must be ensured that activities support social cohesion and trust and do not exacerbate or promote conflict or cause harm to the environment.

Protection: All activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and the spirit of the relevant bodies of law for WFP reflected in monitoring safety, integrity and dignity (i.e. international human rights law, international humanitarian law, international refugee law).⁹ More specifically, protection is understood as aiming to prevent, reduce, mitigate and respond to the risks and consequences of violence, coercion, deprivation and abuse for persons, groups and communities.

Protection outcomes: Protection outcomes include alleviating human suffering,¹⁰ reducing risks and threat levels and improving the safety and dignity of individuals. These will be measured by a reduction in risks to the enjoyment of nutrition and food security.

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

⁶ In line with the preamble of the International Covenant on Civil and Political Rights. <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>.

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

⁸ F3E. 2018. *Incorporating the principle of “do no harm”: How to take action without causing harm.* https://www.alnap.org/system/files/content/resource/files/main/donoharm_pe07_synthesis.pdf.

⁹ This definition is based on the Inter-Agency Standing Committee 2016 policy on protection in humanitarian action. https://interagencystandingcommittee.org/system/files/iasc_policy_on_protection_in_humanitarian_action.pdf.

¹⁰ In line with Article 2 of the International Covenant on Civil and Political Rights. <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>.

Risk factors: Risk factors are threats, vulnerabilities and capacities¹¹ and will require an examination of root causes, circumstances, decisions and events that contribute in various ways to creating or exacerbating patterns of harm.

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

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

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

Scope and considerations

9. This policy applies in all contexts where WFP works – emergency, development and, increasingly, protracted crisis settings. WFP will adhere to the four global principles of protection mainstreaming¹² outlined below and commits to strengthening inclusive engagement and the empowerment of affected populations through enhanced approaches, processes and mechanisms for accountability.
10. Endorsed through the IASC via the global protection cluster, the four protection mainstreaming principles are as follows:
 - **Prioritize safety and dignity and avoid causing harm:** Prevent and minimize as much as possible any unintended negative effects of an intervention that can increase people’s vulnerability to both physical and psychosocial risks.
 - **Meaningful access:** Arrange for people’s access to assistance and services – in proportion to need and without any barriers (e.g. discrimination). Pay special attention to individuals and groups who may be particularly vulnerable or have difficulty accessing assistance and services.
 - **Accountability:** Set up appropriate approaches, processes and mechanisms through which affected populations can measure the adequacy of interventions, influence decision making and make informed decisions.
 - **Participation and empowerment:** Support the development of self-protection capacities and assist people to claim their rights, including – not exclusively – the rights to information, shelter, food, water and sanitation, health and education.

Theory of change

11. This policy is grounded in an explicit and detailed theory of change developed through a bottom-up consultative process involving the active participation of affected populations,

¹¹ See chapter 2 of the professional standards. https://reliefweb.int/sites/reliefweb.int/files/resources/0999_002_Protection_web.pdf.

¹² <https://www.globalprotectioncluster.org/themes/protection-mainstreaming/>

partners, representative organizations, WFP country offices and headquarters partners, host governments and private or donor governments.

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

If:

- WFP knows and understands what protection means for WFP and for affected populations within a given context, meaning that if WFP ensures that information and analysis are grounded in and informed by the diverse perspectives of affected people and communities at the localized level; mobilizes various sectors, clusters and actors to support strengthened timely and relevant analyses; and strengthens its methods and processes for the collection, management, storage and sharing of information gathered through these efforts;
- WFP applies protection understanding in its programmes and operations, through employee as well as cooperating partner capacity building and through protection requirements in its field-level agreements with cooperating partners;
- WFP is accountable, meaning that management of all employees at all levels demonstrates strong commitment and leadership in implementing identified protection outcomes;
- WFP applies the highest standard of due diligence, including through the identification, assessment, mitigation and monitoring of sources of risk in how it conducts operations and in its relationships.

Then,

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

- identifies the people and groups that are most at risk;
- understands the drivers of exposure to risk, which may be numerous;
- cultivates relationships and collaborates with actors to achieve the desired outcome of reduced risk;
- is able flexibly and safely to adapt its interventions based on an ongoing analysis, management and monitoring of risk;
- selects from a menu of appropriate response (activities) options and consults and informs affected populations;
- decides on its activities in line with international human rights norms and international humanitarian and refugee law and the WFP code of conduct; and
- ensures that the strengthening of protection will positively contribute to Sustainable Development Goals 2 and 17 sustainably and effectively.

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

THEORY OF CHANGE

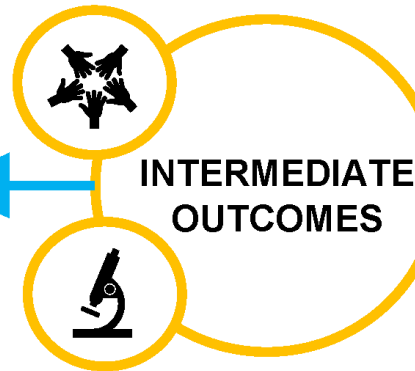
Protection in Practice



IF WFP...

1. Knows and understands what protection means to affected populations within any given context;
2. Applies protection understanding in its operations, through employee as well as cooperating partner capacity-building and through protection requirements in its field-level agreements with cooperating partners;
3. Is accountable, meaning management of all employees at all levels demonstrates strong commitment and leadership to implement the identified protection outcomes;
4. Applies the highest standards of due diligence including through the identification, assessment, mitigation and monitoring of sources of risk in how it conducts operations and in its relationships;

OUR IMPACT

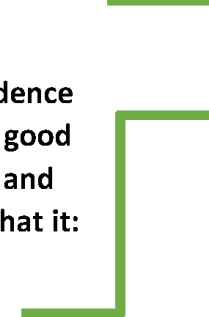


9. Selects from a menu of appropriate response (activities) options and consults and informs affected populations;
10. Decides on its activities in line with international human rights norms and international humanitarian and refugee law and WFP Code of Conduct;
11. Ensures that the strengthening of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

5. Identifies the people and groups that are most at risk;
6. Understands the drivers of the exposure to risk, which may be numerous;
7. Cultivates relationships and collaborates with actors to achieve the desired outcome of reduced risk;
8. Is able to flexibly and safely adapt its interventions based on an ongoing analysis, management and monitoring of risk;

THEN, WFP...

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



Context analysis

15. The theory of change places heavy emphasis on analysing the unique characteristics of each context, which by their nature may be liable to rapid change. There is no one-size-fits-all checklist – the theory requires understanding the character of a threat, its source and the main actors, behaviour, policy or practice driving it. A localized understanding of issues requires field presence coupled with relevant and adequate expertise to reflect on relationships and dynamics between groups, in conjunction with ongoing monitoring and analysis to ensure the relevance of programmes and operations.
16. Assessing circumstances in a way that takes into account protection and conflict should enable WFP to develop practical relationships and collaboration with humanitarian, development and peacebuilding actors¹³ in support of protection outcomes. Indeed, better understanding the coping mechanisms and capacities of affected populations enables the design of effective programmes and operations. Such understanding will also help WFP and its partners build on humanitarian interventions to promote people's ability to be self-sufficient. Inclusive and conflict-sensitive context analyses are also likely to result in interventions with long-term impact. Without investments in resilience and development, returns on humanitarian action will be marginal. For example, contributions to durable solutions for internally displaced persons can serve as entry points for WFP's work in emergency, development and peace interventions. Such solutions are more likely to be successful if protection is at the core of their design.
17. Sound contextual analysis will help to ensure that the risks and needs of people in the most vulnerable situations are identified in a holistic, focused and accurate manner and that the drivers of vulnerability are comprehensively analysed and understood. Special attention must be paid to the needs of the people most at risk, taking into account that there may be many layers of vulnerability such as the probability of violation,¹⁴ abuse, harm, suffering, disadvantage and discrimination.¹⁵ Geography, socioeconomic status, coping mechanisms and power structures including gender, age and conflict dynamics are also crucial to understanding who suffers and how in WFP's areas of operation.¹⁶
18. Evidence-based decisions require data disaggregated by sex, age and disability, as well as other information related to barriers to inclusion. WFP will explore all data sources to ensure that barriers to inclusion such as language, livelihood and location are identified. Understanding how factors intersect and interact is central to WFP's strengthened approach to protection and to ensuring that its programmes and operations are delivered safely while respecting the dignity and integrity of the people it serves. It is only through engaging

¹³ See WFP/EB.2/2013/4-A/Rev.1.

https://documents.wfp.org/stellent/groups/public/documents/eb/wfpdoc062766.pdf?_ga=2.154412152.1929319844.1589546716-569886101.1576844091.

¹⁴ Violations are actions that result in cutting people off from access to food and markets, such as blocking or taking over roads or key logistics hubs like ports, and communities themselves. Similarly, destruction of the sources of livelihoods, such as by setting fire to crops and farmland, inhibit communities' ability to cope and often causes destitution and displacement. See United Nations Security Council Resolution 2417 (2018) on this issue.

¹⁵ For example, persons with disabilities constitute a significant percentage of the people who are disproportionately affected by conflict and humanitarian crises. The Inter-Agency Standing Committee has accordingly developed guidance in line with the Convention on the Rights of Persons with Disabilities. Similarly, indigenous peoples are also among the most marginalized groups globally and face many forms of discrimination, often resulting in their overrepresentation among the food insecure.

¹⁶ See remarks by the United Nations Secretary-General to the Human Rights Council on 25 February 2019: <https://www.un.org/sg/en/content/sg/speeches/2019-02-25/remarks-the-human-rights-council>.

individuals and thereby acquiring an understanding of their needs that beneficiaries will give free, prior and informed consent.¹⁷

Alignment with WFP's actions and frameworks

19. Bound by relevant international normative frameworks, WFP's purpose and functions are: "a) to use food aid to support social and economic development; b) to meet refugee and other emergency and protracted relief food needs; c) to promote world food security in accordance with the recommendations of the United Nations and the [Food and Agriculture Organization of the United Nations]."¹⁸ In humanitarian settings, WFP is also obliged to engage and interact with all relevant national and other authorities and non-state groups. Complementarity and coordination, both internally and externally, are key to maximizing protection outcomes.
20. Internally, this policy must inform WFP's other areas of work and focus, as well as the frameworks that define them. Among other things, WFP considers that approaches to access, climate, gender, disability inclusion, respect for diversity, data protection and social protection issues are particularly important in reinforcing protection.

Access

21. Access is a broad term that can refer to access to services, to nutritious foods and to markets. It is often considered in conflict situations. Access can be hindered by systemic and structural limitations such as stigma, discrimination, economic and social inequalities and legal barriers.
22. Engagement with affected populations enables meaningful access and access enables protection. Because WFP frequently operates in volatile, complex and insecure environments, its ability to establish and maintain principled and safe access is often challenged. WFP's planning for access-sensitive programmes and operations and its role in supporting or engaging directly in the negotiation of access with official and de facto authorities must be grounded in the centrality of protection. This includes examining all operational modalities designed to facilitate access from the perspective of protection, the do-no-harm principle and conflict sensitivity. When negotiating access, protection considerations, along with humanitarian principles, are the primary criteria to be considered in evaluating options and engaging with interlocutors.
23. With these considerations in mind it is essential that comprehensive context analysis that includes actor mapping and conflict analysis be informed by the protection landscape, including through engagement with the people that WFP aims to serve, their communities, local leaders and other authorities. In such engagement, special attention must be directed to ensuring the meaningful inclusion of vulnerable and at-risk groups suffering from exclusionary practices. Experience has shown that building trust among the people WFP serves, combined with effective and inclusive action, is essential to winning over leaders and their communities. This will help to ensure sustainable and safe access for people in need of assistance.

¹⁷ See United Nations Convention on the Rights of Persons with Disabilities (2006). https://www.un.org/disabilities/documents/convention/convention_accessible_pdf.pdf.

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

¹⁸ Article II of WFP General Regulations. <https://docs.wfp.org/api/documents/WFP-0000021766/download/>.

Environment and climate change

24. Environment and climate **change**¹⁹ are risk multipliers, amplifying and compounding inequality and vulnerability,²⁰ particularly where competition over access to scarce resources causes conflict and inequality. As such, environment and climate change must constitute a core issue in context analysis in respect of groups that face particular risks.²¹ WFP must understand the implications of a specific climate shock for a population beyond applying technical adaptation policies. WFP must understand how climate change is exacerbating existing conflict and tensions between communities. Working with communities to respond to shocks and to design disaster risk-reduction strategies through means accessible to and in language understood by all must be a prerequisite. Local inputs will facilitate better operational programme design while building on existing coping mechanisms.

Gender

25. Intersectionality is key to applying this protection policy effectively. Structural and sociocultural gender inequalities will surface through context analysis.²² By systematically integrating gender into design and implementation, food assistance activities can be adapted to the specific needs of women, men, girls and boys. Women and men alike need to be engaged in finding protective food security solutions. Gender analyses enable WFP to understand how structural inequalities are compounded by recurring risks that result in welfare declines and well-being among women. At the same time, such analyses are also instructive in identifying critical gaps that need to be addressed through nuanced and tailored programming that results in strengthened food security, gender and protection outcomes.
26. Gender-based violence²³ remains startlingly prevalent in the conflict and protracted crisis settings where WFP operates.²⁴ Accordingly, the prevention of gender-based violence through identifying and addressing its drivers must be included across all areas of WFP interventions.

Disability inclusion

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

¹⁹ See environmental and social safeguards, in WFP. 2017. *WFP's Climate Change Policy*. <https://docs.wfp.org/api/documents/WFP-0000023971/download/>.

²⁰ Ibid.

²¹ See for example WFP. 2019. "Indigenous People's Day: on the path to Zero Hunger" at <https://insight.wfp.org/indigenous-peoples-on-the-road-to-zero-hunger-123584415fcc> on the impact of climate change on indigenous peoples in Colombia, the Democratic Republic of the Congo and the Plurinational State of Bolivia.

²² See WFP. 2015. *WFP gender policy 2015–2020*. https://documents.wfp.org/stellent/groups/public/documents/communications/wfp276754.pdf?_ga=2.19765944.1854708687.1585905072-569886101.1576844091.

²³ As defined in the WFP gender policy from 2009 (WFP/EB.1/2009/5-A/Rev.1). https://one.wfp.org/eb/docs/2009/wfp194044-2.pdf?_ga=2.261304201.508926520.1592300464-1238263986.1562678720.

²⁴ Inventory of United Nations Activities to End Violence against Women. Webpage on WFP activities. <https://evaw-inventory.unwomen.org/fr/agencies/wfp>.

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

Data protection

29. In carrying out its mandate, WFP processes a large quantity of data, including personal data of its beneficiaries and prospective beneficiaries. Protecting data is a fundamental part of WFP’s duty of care to those it serves. The processing of personal data carries inherent risks that are often unrecognized and unaddressed. Privacy breaches and the disclosure of data, whether intentional or unintentional, may have important ethical and operational repercussions. The loss, theft or misuse of personal data may cause harm to the people WFP seeks to assist, as well as to WFP personnel. Breaches in confidentiality could have dire consequences for individual beneficiaries or beneficiary communities, ranging from abuse and ostracism to death.²⁵
30. Digital transformation is one of WFP’s corporate initiatives, with digital solutions informing programme and operational cycles. WFP’s current digitalization process is exponentially increasing the amount and type of data processed. Beneficiaries’ personal data must contribute to accountability, inclusion, good programming, assurance and improved coordination with partners. While there are multiple issues, it is necessary to consider them in a manner that takes protection into account as WFP introduces new technologies and services, whether in digital or analog forms. WFP must adopt a person-centred approach that emphasizes the identification of data protection risks and mitigation measures for affected people as part of its context analysis, operational programme design and programme delivery, including the promotion of inclusion and digital literacy. The use of technology when supporting the collection of personal data by WFP and its partners must be informed by protection considerations to prevent potential discrimination or exclusion. Data disaggregation is key to targeting and reaching people in the most vulnerable situations; nevertheless, data protection and privacy principles as well as informed consent²⁶ must be applied to the collection, storage and sharing of personal data. In addition, WFP’s approach to and use of data, and their consequences, must be explained in ways and languages accessible to affected populations.

²⁵ See WFP. 2016. *WFP Guide to Personal Data Protection and Privacy*. <https://docs.wfp.org/api/documents/e8d24e70cc11448383495caca154cb97/download/>. United Nations Chief Executives Board for Coordination High-level Committee on Management. 2018. *Personal Data Protection and Privacy Principles*. <https://www.unsystem.org/personal-data-protection-and-privacy-principles>.

²⁶ See Amnesty International and others. *Professional Standards for Protection Work, third edition*, ch. 6. https://reliefweb.int/sites/reliefweb.int/files/resources/0999_002_Protection_web.pdf.

Social protection²⁷

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

WFP cross-departmental policy coherence

32. To deliver on this protection and accountability policy, some institutional shifts by WFP are required to expand beyond programmes and operations. The prioritization of protection and accountability, starting from the leadership group and extending throughout the organization, will be the key driver of the policy's effective and impactful implementation. The policy must therefore feature as a core element of the WFP strategic plan that will be launched in 2022 and also in key departmental approaches related to human resources, including capacity development, communications and enterprise risk management.

Human resources

33. The forthcoming WFP "people policy" (scheduled for approval in 2021) is a way to ensure that protection becomes everyone's business, as it reflects the link between this policy and WFP's values of inclusion and diversity. In addition, protection is at the core of the training required to build a cadre of high-impact leaders. Field consultations suggest that WFP needs to diversify employee profiles, for example by seconding employees to other institutions and bringing back knowledge to WFP (and vice versa), to ensure that protection is fully understood within the multilateral system. WFP managers are also responsible for investing in protection skills development for employees and for bringing specialized protection expertise into the organization, as needed. Finally, protection should feature in performance appraisals for the managers responsible for implementing this policy. For country directors, it may constitute an area for resident coordinators' performance input, given that human rights is one of the five areas of mutual accountability between resident coordinators and United Nations country teams.

Communications

34. Future communications strategies should integrate protection considerations across three areas of activity. First, advocacy campaigns should be used as an opportunity to raise awareness of beneficiary protection needs and WFP's role in addressing these. Second,

²⁷ WFP defines social protection as a broad set of arrangements and instruments designed to protect members of society from shocks and stresses throughout their lives framed under the umbrella of the right to social security. See Office of the United Nations High Commissioner for Human Rights. Toolkit on the right to social security webpage. <https://www.ohchr.org/EN/Issues/RightSocialSecurity/Pages/SocialSecurity.aspx>. The right to social security is the right to access and maintain benefits, whether in cash or in kind, without discrimination in order to secure protection, inter alia, from (a) lack of work-related income caused by sickness, disability, maternity, employment injury, unemployment, old age, or death of a family member; (b) unaffordable access to health care; (c) insufficient family support, particularly for children and adult dependents. *Committee on Economic, Social and Cultural Rights, General Comment 19*. [https://www.ohchr.org/EN/Issues/Education/Training/Compilation/Pages/g\)GeneralCommentNo19Therighttosocialsecurity\(article19\)\(2007\).aspx](https://www.ohchr.org/EN/Issues/Education/Training/Compilation/Pages/g)GeneralCommentNo19Therighttosocialsecurity(article19)(2007).aspx).

See also *International Labour Organisation No. 102 on Social Security*. https://www.ilo.org/secsoc/areas-of-work/legal-advice/WCMS_205340/lang--en/index.htm.

protection considerations should be embedded in internal messaging, monitoring and compliance in order to help ensure organizational consistency and that standards are upheld. Last, for communications materials directed to affected populations, it is vital that messaging be protection-centred in order to prevent exclusion, stigmatization and discrimination. This means that communications employees must have the skills necessary to include protection messages in communications materials.

Enterprise risk management

35. WFP's risk management framework²⁸ is event-based and designed to identify and respond to risks at the point of impact. In addition to anticipating and responding to protection-related risks, other strategic, operational and fiduciary risks (such as fraud, breach of obligations, cyberattacks and programme design risks) that may have an indirect impact on protection must also be addressed.²⁹ Country directors are accountable for implementing risk management effectively within their countries of operation, including by assigning risk owners; chairing regular risk discussions to review risk and control information, including possible indicators; and following up on mitigation measures. Protection risks, as well as the risks to WFP listed in the theory of change, should be systematically included in country office risk registers. Doing so will require a twin-track approach, with dedicated protection risk assessments of affected populations when new activities or programmes are initiated along with consideration of protection risks as part of annual country office risk assessment processes. Risks deemed to exceed a country office's risk threshold will be prioritized for mitigation.

Sexual exploitation and abuse

36. Sexual exploitation and abuse constitute extreme forms of abuse of power that take advantage of the vulnerability of the very people WFP and partner organizations are meant to serve. As such, sexual exploitation and abuse are significant protection concerns for WFP. It is imperative that all WFP programmes and operations include measures to safeguard affected populations and ensure that they can safely access WFP programmes without being subject to sexual exploitation or sexual abuse by WFP employees, partners or vendors. Monitoring and effective community feedback mechanisms are essential for detecting incidents of sexual exploitation and abuse. Where sexual exploitation and abuse are attempted, committed or reported, WFP must respond swiftly with a survivor-centred approach and the launch of an independent investigation.

Partnerships

37. WFP partners with a wide range of actors to strengthen the impact of its programming and local capacity. Partners are held to the same protection standards as WFP, as reflected in field-level agreements. Through partnerships, broader sectoral responses will be coordinated and combined to achieve effective long-term protection outcomes. Partnerships must integrate do-no-harm principles and ensure that conflicts of interest do not arise.

Accountability to affected populations

²⁸ WFP. 2018. Third informal consultation on WFP's 2018 enterprise risk management policy. <https://docs.wfp.org/api/documents/WFP-0000073078/download/>.

²⁹ This includes examining risks to the reputation of WFP and its implementing partners, such as programme risks related to the inclusion, support or exclusion of individuals or groups that could harm WFP's reputation or operations. This could include support for individuals or groups who incite conflict, violence or hate and thus fuel conflict (strategic) or support for individuals suspected of involvement in national or international criminal activities (strategic), involvement or direct implication in violations of human rights law or international humanitarian and refugee law, including sexual exploitation (strategic), or violations of United Nations Security Council sanctions, depending on country context (strategic).

38. WFP is first and foremost accountable to the people it serves; accountability, participation and empowerment through meaningful and consistent engagement are the key principles for mainstreaming protection.³⁰ This means ensuring that affected populations, their families and diverse community organizations representing young people, older people, indigenous peoples, people living with HIV/AIDS and persons with disabilities participate in the decisions that affect their lives, receive the information they need to make decisions and have access to safe and responsive mechanisms for providing feedback.³¹ It also means working to ensure that affected populations have safe and dignified access to assistance in proportion to their needs, priorities and preferences.
39. Investing in engagement with affected populations through adapted and accessible materials in clear terms and appropriate languages will facilitate acceptance of WFP's presence and sustained and unhindered humanitarian access, enabling affected populations to obtain WFP services and providing a level of protection for WFP staff and assets. This two-way communication with affected populations will be supported by the development of a system-wide community engagement strategy.³² This includes ensuring that activities designed at the field level with affected populations are validated by those same affected populations. Mechanisms for providing positive and negative feedback must also be set up to ensure that programmes and operations respond to needs as they evolve.

External operational and strategic partnerships

40. Context analysis informs when and how WFP should partner or coordinate with other actors, including its cooperating partners and other local actors, and helps determine what WFP's protection role should be within these partnerships and relationships. This involves a two-way exchange: information on protection needs and risks that emerges from WFP programmes and operations must be made available to other actors and vice versa to inform multisectoral and multidisciplinary strategies and interventions. The humanitarian country team can provide a suitable forum for sharing information and devising prevention and response strategies.
41. Among its partners, WFP should seek out actors with strong capabilities in protection monitoring to ensure that programmes and operational plans are adequately informed. In addition, WFP will enable and support other agency actions through its operational or logistics platform and cluster leadership roles. For instance, other partners may leverage WFP food distribution sites or centres where people are being enrolled in cash transfer programmes to transmit protection-sensitive messaging. In general, WFP should draw upon and contribute to existing frameworks and mechanisms to advance protection and accountability, such as the humanitarian country teams; humanitarian response plans; and its coordinating role and membership in the cluster system and United Nations country teams. It should also strengthen partnerships with protection-mandated organizations such as the Office of the United Nations High Commissioner for Refugees and the United Nations Children's Fund.

³⁰ Global Protection Cluster. Webpage on protection mainstreaming. <https://www.globalprotectioncluster.org/themes/protection-mainstreaming/>.

³¹ Feedback is an overarching term to include feedback provided by an individual or a group of people. Feedback can be formal (captured through specific mechanisms and processes) or informal (captured in an ad hoc manner). All feedback requires a closed feedback loop. This can only be achieved once the individual or group of people who submitted the feedback has expressed satisfaction with the action. A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action of WFP or a partner organization or their employees. It is a criticism that expects a reply and calls for something to be changed. In the context of this policy, a complaint is an external grievance asserting that WFP or a partner or any of its employees has made mistakes, acted wrongfully, breached applicable codes of conduct or failed to meet a commitment. Feedback relates to an expression of concern, a statement of thanks or appreciation or a sharing of a question or suggestion.

³² Developing and implementing a community engagement strategy responds to recommendation 6 of the evaluation.

42. At times, advocacy related to sensitive protection issues may be best addressed outside the country office by the WFP Executive Director and other United Nations entity principals or other senior officials. This will be discussed and coordinated at the inter-agency level to avoid sending mixed messages. At the global level, WFP will also continue to engage with global protection forums to ensure that it contributes to policy discussions and stays abreast of developments that may affect its own strategies, programmes and operations.

Donor relations

43. To support the implementation of this policy, WFP will continue to work in the four areas of acceleration identified in its strategy for protection and accountability to affected people for 2019–2021.³³ This includes investing in operational research and partnerships with expert institutions while continuing to build in-house capacity through awareness raising and strengthened learning tools for staff and leaders. WFP will also share best practices and challenges within inter-agency forums while updating its own risk management, data collection and reporting tools.
44. Some elements of WFP's internal protection capacity have been mainstreamed in the programme support and administrative budget for 2020, with plans to address some regional capacity gaps in 2021. However, additional, predictable and flexible resources are needed to enable the successful implementation of the proposed approach, as laid out in the implementation plan for this policy for 2021-2027 (WFP/EB.2/2020/4-A/2). Implementing this strategy will also require increased investment in protection at the country level, which will be reflected in the next round of country strategic plans and through revisions of those plans.

Reporting, monitoring and compliance

45. For WFP to be effective, work on protection must be well coordinated within WFP; with government and key United Nations and NGO partners at the country level; and at the global level within inter-agency fora and with the Executive Board. This will require actions at the institutional and operational levels as outlined below. Mutual accountability with donors is required to ensure that the implementation of the updated policy is prioritized, funded, time-bound and monitored by all parties.
46. Communicating the importance of this new policy to WFP leaders and decision-makers will be an important step in demonstrating the organization's commitment to it. WFP will use fora such as regional country director meetings and the global management meeting to highlight the relevance of the new policy to the work of the organization and to showcase the support structures in place to help country offices better integrate protection concerns into their country programmes and operational frameworks.

Institutional level

47. WFP will reflect its commitment to protection and its contribution to protection outcomes in regular updates to the Executive Committee of the Secretary-General and to the General Assembly, as well as through its participation in open debate at Security Council sessions on the protection of civilians. The Assistant Executive Director, Programme and Policy Development Department, will be responsible for the alignment of actions and frameworks to ensure policy coherence. WFP will also explicitly incorporate protection and accountability into its suite of enterprise risk management tools (e.g., Executive Director assurance statement, Corporate Risk Register, annual performance plan) to ensure accountability for policy implementation. Protection and accountability considerations will

³³ <https://docs.wfp.org/api/documents/e8d24e70cc11448383495caca154cb97/download/>. The four areas of acceleration are analysis and implementation; partnerships; systems; and leadership and expertise.

inform the forthcoming strategic plan, its accompanying corporate results framework, including specific indicators to measure management performance and accountabilities.

48. The Director, Programme – Humanitarian and Development Division will provide annual updates to the Executive Board on progress in the implementation of this policy.

Operational level

49. WFP will ensure that coherent working structures are in place at headquarters and in regional bureaux to support country offices in the implementation of this policy, aligned with and complementary to initiatives under United Nations sustainable development cooperation frameworks and humanitarian country plans.
50. Country directors and their country management teams have the responsibility to incorporate protection considerations into WFP country strategic plans and country portfolio budgets, complementing the work of other partners across the multilateral system. This will be checked during the project review process.
51. WFP will adjust monitoring frameworks and the corporate results framework as needed to ensure that the organization adequately measures results on the ground, keeping the Executive Board informed of any delays or challenges in implementing the progressive measures for implementing this policy.
52. WFP will undertake a mid-term review of this policy during the third year of its implementation.
53. For the policy's successful implementation, sufficient financial resources are required at the corporate, regional and country levels. WFP commits to providing an implementation plan with an estimated budget for consideration by the Board no later than its 2021 annual session. This will include a notional allocation of estimated costs across appropriate funding sources including the programme support and administrative budget, country portfolio budgets, and extra-budgetary support.

ANNEX

Summary of recommendations from the 2018 evaluation

Recommendation 1: A new policy

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

Recommendation 2: Integration into risk management

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

Recommendation 3: Partnerships

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

Recommendation 4: Leadership and human resources

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

Recommendation 5: Evidence base

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

Recommendation 6: Stakeholder dialogue

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