

# GLOBAL SAFEGUARDING REPORT

## Fiscal Year 2020

### A Message From Our CEO

I am humbled and honored to be joining Mercy Corps as its CEO. Stepping into this role I am energized by the work I see happening across our organization to ensure we meet our responsibility to create environments and deliver programming with dignity and respect. Strengthening our safeguarding systems and processes, is one way we do this. Yet, we know that it takes more than just policies and procedures to be successful. All our actions, big and small, level up to create the organization Mercy Corps is. For my part as CEO, I plan to hold myself and our teams accountable for moving these important initiatives forward.

This, Mercy Corps' second annual Global Safeguarding Report, outlines our approach to safeguarding, details how we have enhanced our safeguarding globally over the past year, and provides transparency around incident-related data and learnings for Fiscal Year 2020. We are committed to publishing this annual safeguarding report to provide an important resource for Mercy Corps team members around the world, and for our partners and the broader sector as we all seek to improve safeguarding for the communities we serve.

A key focus in Fiscal Year 2020 was continued improvements to safeguarding awareness, including understanding of our reporting mechanisms and incident response processes. These efforts flowed through multiple internal communications channels and the continued rollout of mandatory safeguarding training courses. We have also made improvements through new and updated tools and resources for team members and partners. Integral to these efforts was the training and placement of in-country safeguarding support staff in 33 countries around the world. In addition to these activities, Mercy Corps has made significant financial investments to bolster our safeguarding systems. This has allowed for the expansion of our Global Safeguarding Team to more than double its Fiscal Year 2019 size. With the creation of a new Chief Ethics and Compliance Officer position, we have also established a new standalone Intake and Investigations Unit to ensure consistent and timely response to all reported incidents.

This report also shows that ensuring the safety and wellbeing of our program participants, and building an environment where everyone feels welcome and included, requires continuous effort. Together with our partners and participants, we strive to learn and adapt, identify and share best practices, and ensure survivor needs remain at the center of our safeguarding work. We are committed to the advancement of our larger goal of creating and maintaining safe and inclusive spaces for all those we come in contact with everywhere we work.

Mercy Corps is committed to building a better world where everyone is treated with dignity and respect. It's work that requires constant vigilance and determination from each and every member of our team, and it could not be more important. It is from this place of safety and inclusion that we can work together to solve our world's complex challenges.



Tjada D'Oyen McKenna  
Mercy Corps CEO



# Introduction

We are a global team of humanitarians who partner with individuals, communities, corporations, and governments to transform lives around the world. Our mission is to alleviate suffering, poverty, and oppression by helping people build secure, productive, and just communities. Our diverse global team, 5,600+ strong, works with communities in over 40 countries; 85 percent of our team is from the countries where they work. As a global humanitarian organization serving the world’s most vulnerable communities, we take seriously our responsibility to program participants, donors, and team members across the countries in which we work. We aspire to create an inclusive and safe work environment, where everyone is treated with dignity and respect.

Accountability and transparency are fundamental to overcoming legacies of harm in our sector. Mercy Corps is committed to transparency in our safeguarding efforts and our response to allegations of harm. We continue to work to build trust and confidence in our reporting and investigation mechanisms and our safeguarding systems overall.

This is our second annual Global Safeguarding Report.<sup>1</sup> We began publicly sharing data around our safeguarding allegations and investigations in 2019.<sup>2</sup> We will continue to share data and updates on our safeguarding progress through this annual publication in a way that ensures survivor sensitivity and confidentiality.

## Executive Summary

This publication details Mercy Corps’ safeguarding efforts, status updates, and incident-related data for fiscal year 2020 (FY20).<sup>3</sup> The report is divided into three main sections in alignment with our approach to safeguarding—prevention, response, and data driven adaptation. Within each of these sections, we provide an overview of our key priorities and actions in FY20.

Data on our case numbers is provided in the response section. We have seen an overall increase in cases between FY19 and FY20. We believe this reflects growing awareness of safeguarding standards among team members and program participants and increasing confidence in our reporting and response systems. Incident data within this report is shared without any personally identifying factors, in accordance with our commitment to survivor centered principles and confidentiality.

Mercy Corps remains deeply committed to ongoing progress on our safeguarding efforts and continued work to be a safer, more accountable, survivor-focused agency where exploitation and abuse are not tolerated. We will continue working in FY21 to strengthen practices, systems, policies and workplace culture in ways that contribute not only to our programs, but to the sector as a whole.

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1 Our 2019 Global Safeguarding Report was released in two parts and can be found on our website.

2 We consider safeguarding allegations to include allegations of sexual exploitation and abuse, internal sexual misconduct (including sexual harassment), child safeguarding and human trafficking. For our full policies, see our [website](#).

3 Fiscal year 2020 spans a date range from July 1, 2019-June 30, 2020.

# Our Commitment to Safeguarding

Any abuse or exploitation of children or adults by our team members, partners or other representatives directly contradicts the principles upon which our humanitarian work is based and can inflict life-long harm on those experiencing it. Mercy Corps is committed to ensuring a culture of zero tolerance of abuse, and to ensuring physical and psychological safety within our teams and our programs. We recognize this requires continuous effort and involves structural as well as individual factors.

Our focus on safeguarding complements agency initiatives to increase internal diversity, equity and inclusion. We are working to strengthen leadership capacity around equitable and effective management and fostering an environment where every voice is respected and heard. Collectively, these initiatives amplify our efforts to prevent misconduct from occurring and ensure consistent and trusted reporting pathways, as well as an urgent and survivor centered response should an incident occur.

## Our Safeguarding Approach

We define safeguarding as our responsibility to ensure team members, operations and programs do not harm those we work with or put vulnerable populations at risk of abuse or exploitation. Our approach is founded on three pillars:

- › **Prevention** through strong policies, safe hiring practices, onboarding, training and effective management, mainstreaming safeguarding into our culture and programs;
- › A robust and trusted **response** system with accessible reporting channels and timely, thorough, survivor centered investigations.
- › Using **data**, lessons learned and evolving sector best practice, to **reflect and adapt** in order to continually strengthen our safeguarding systems.



The overarching principle in our safeguarding work and the pillars listed above, is **a survivor centered approach**. This places the safety, well-being, and perspective of survivors at the core of our efforts. Within our organization and across the sector, we have seen the damage done when survivors are not listened to, not believed and not treated with care and respect. We are committed to learning from our failures—both in the early 1990s and in 2018—to respond appropriately to a survivor, and we are committed to ensuring we provide all survivors with a safe, supportive, and confidential place to come forward, where their needs are the first priority.<sup>4</sup> We are dedicated to listening to survivors and ensuring their voices and experiences inform our safeguarding approach.

<sup>4</sup> An external review into this incident took place in 2019/2020 and can be found on our [website](#) along with our agency Commitments to Action and reports on our progress towards these commitments.

Mercy Corps works to ensure anyone approaching the organization with allegations regarding exploitation or abuse is treated in a survivor centered manner in accordance with the values inherent in our policies. We acknowledge the strength and courage of survivors in coming forward, and we thank all those who have helped us become a more ethical, safe, and effective organization by reporting their experiences.

## Prevention

Our fundamental safeguarding goal is to prevent harm before it takes place. We work to ensure that every interaction between Mercy Corps team members, partners, community members, and participants is rooted in respect and dignity. Key prevention priorities include: effective and comprehensive safeguarding policies; safe recruitment, hiring and onboarding; internal and external<sup>5</sup> awareness raising; and investment in designated global and in-country support staff and resources to mainstream safeguarding agency-wide. Underpinning all of this is our commitment to creating an inclusive, safe, accountable agency culture. We strive internally and in our programming to minimize inequitable power dynamics and the systems that perpetuate discrimination and oppression.

## Policies

Our Safeguarding Policies are living documents that we strive to ensure are clear and effective, reflect the needs and voices of survivors, and are at the forefront of sector and donor expectations. Our Prevention of Sexual Abuse and Exploitation of Participants and Community Members (PSEA) and Child Safeguarding Policies were updated this year to clarify their applicability to former team members and past activities, as well as requiring the investigation of cases involving senior management or board members by an external investigator.

## Safe Recruitment and Hiring Practices

We continue to strengthen our recruitment and hiring processes to ensure that we take all appropriate steps to keep people who have committed harm, or may have a propensity to do so, out of our organization. We have expanded the safeguarding language in our position descriptions and developed more robust safeguarding interview questions. We are also participating in collaborative efforts with peer organizations that seek to keep those who have caused harm from reentering or moving to new positions within the sector.

## Culture Building and Gender, Diversity and Inclusion

Agency wide culture-building efforts help create an inclusive, accountable work environment, where every voice is heard and respected, and team members feel comfortable expressing concerns.

Our gender, diversity, and inclusion (GDI) priority helps to ensure that: 1) inherent power dynamics that perpetuate inequity and dominant power structures are addressed; 2) our teams are representative of the communities where we work; 3) all team members feel welcomed, supported by their peers and leaders, and have the opportunity to realize their potential; and 4) we have diverse, inclusive teams that can create meaningful impact for the most vulnerable populations globally.

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<sup>5</sup> Internal refers to Mercy Corps Team Members, external includes partners, contractors or other non-traditional employees or agency representatives or associates of Mercy Corps.

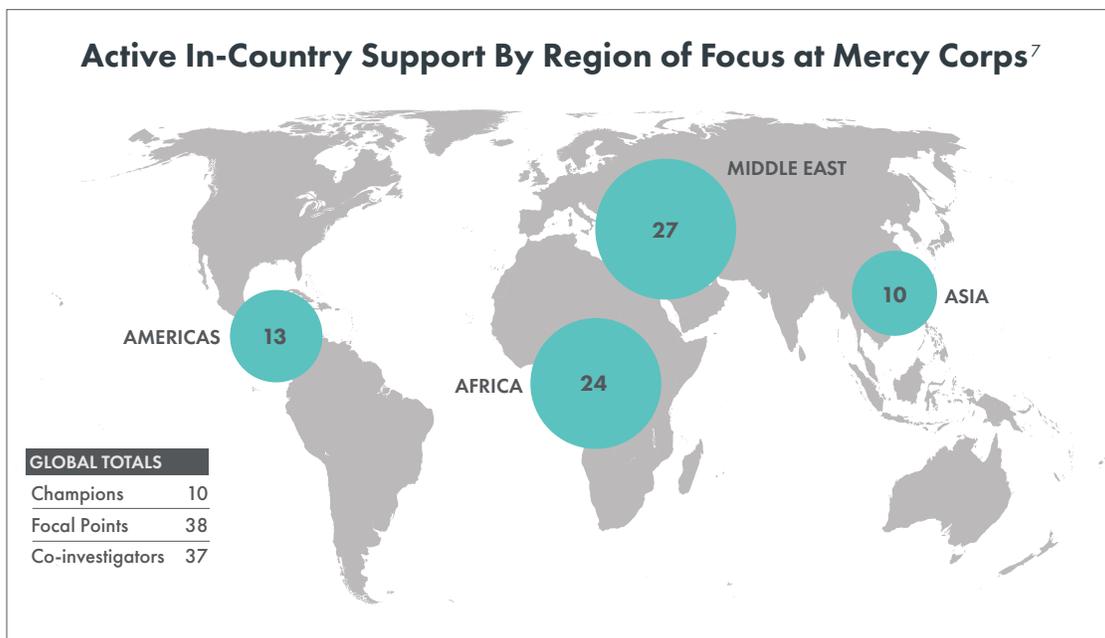
Additionally, we have an agency-wide internal training program designed to help teams become learning oriented, adaptive, and high-performing by building a strong foundation of trust and psychological safety. This 12 week long training supports managers and their teams to discuss and utilize practices that empower teams, build trust, demonstrate care and foster inclusion.

## Designated Global Safeguarding Team

In FY20 and early FY21 we have made significant additional investments in our safeguarding prevention efforts, including expansion of our global safeguarding team and strengthened in-country safeguarding support. Our global team includes a Director of Safeguarding reporting to our VP of People, a Senior Program Officer and Assistant Program Officer, and a Safeguarding Advisor based in our Mercy Corps Europe office. We are also in the process of adding a new Safeguarding Accountability Advisor who will focus particularly on strengthening our approach to safeguarding with partners.

## In-Country Safeguarding Support

Safeguarding Focal Points and Champions are a key part of our prevention efforts (figure 1). They serve as in-country safeguarding resources, working with their teams to raise awareness, deliver face-to-face training, and build trust and confidence in our systems and reporting mechanisms. Focal Points and Champions are trained in survivor centered principles and assist in liaising with survivors if needed. They are available as reporting mechanisms for individuals with concerns, and serve as a referral pathway for survivors or others in need of support services. Safeguarding Focal Points and Champions create and maintain community resource maps, which identify support services available in each country.<sup>6</sup> These important resources are used to assist survivors or other individuals in need of support.



**FIGURE 1:** The total number of in-country safeguarding support staff broken down by region and type, including the roles of Safeguarding Champion, Safeguarding Focal Point, and Safeguarding Co-Investigator. Definitions of each role type are found in Annex A.

<sup>6</sup> Support services may include medical services, legal support or advice, child protection services, support for victims of gender based violence and many other services for vulnerable groups provided by (I)NGOs, community programs, social services, government agencies or others.

<sup>7</sup> This map shows the total number of safeguarding support staff at Mercy Corps by region with global totals for each type of support role in the insert table.

## Safeguarding Capacity Building

Safeguarding capacity building efforts at Mercy Corps include tools, resources and trainings created for specific stakeholder groups including all-agency level learning, leadership, partner organizations and incentive workers, program teams, human resources teams, monitoring and evaluation teams, and others. Our safeguarding training and targeted capacity building in fiscal year 2020 included:

- › Externally facilitated safeguarding training for Mercy Corps Europe and Mercy Corps Global Board Members
- › Safeguarding awareness sessions for country and regional leadership
- › Externally facilitated training for safeguarding focal points and co-investigators
- › Regular ongoing training and support for focal points and co-investigators
- › Training for team members and partners led by in-country Safeguarding Support
- › Updated mandatory annual Code of Conduct training for all team member

## Response

We have made significant investments in our safeguarding response mechanisms and systems in FY20, most notably through a newly formed Intake and Investigations (I&I) Unit, the placement of co-investigators as added in-country investigations support, and improvements to our reporting mechanisms.

### Reporting Mechanisms

Trusted, accessible and well-understood reporting mechanisms are a critical component of safeguarding. Throughout FY20, we have prioritized improved understanding of and trust in our reporting mechanisms and investigation process through awareness raising, a formalized global policy on community accountability and reporting mechanisms (CARM), and improved transparency. In order to help foster a speak out culture and increase access, we provide multiple avenues by which team members, partners, program participants, and community members can report feedback or concerns. Team members may report to management, Human Resources, Safeguarding Focal Points, or the Mercy Corps Integrity Hotline.<sup>8</sup> The platform provides a simple, multilingual end-user experience and allows for confidential or anonymous communication between reporters and investigators.



For community members and program participants, we provide accessible, locally relevant Community Accountability Response Mechanisms (CARMs).<sup>9</sup> CARM implementation is a key agency priority and we

<sup>8</sup> The Integrity Hotline utilizes a third party platform with 24/7 access and a flexible set of intake channels including web, phone, and mobile texting, accessible in multiple languages.

<sup>9</sup> Team Members may also use a community accountability reporting mechanism if they choose and community members or participants are welcome to use the Integrity Hotline or other reporting avenues.

are in the process of rolling out and standardizing these mechanisms through all of our locations. A new global CARM Policy outlines nine minimum standards for community accountability and requirements for partners.<sup>10</sup> All Mercy Corps country programs and entities are required to meet the standards within this global policy to ensure a standardized approach to community accountability.

## Incident Response and Investigations

We are committed to a timely, thorough and survivor centered response to all allegations of misconduct. To that end, we have made significant additional investments in our incident response capacity in FY20, including greater resourcing of our investigative team, engaging external investigators as needed, and by improving our ability to connect survivors quickly with support resources as described in the prevention section above.

A key focus of FY20 was a complete redesign of our investigation systems and oversight structure. The newly formed Intake and Investigations (I&I) Unit will become functional in FY21 and consolidate all response and investigative responsibilities into a single unit within a new stand-alone Ethics and Compliance Department.<sup>11</sup> This department will be led by a Chief Ethics & Compliance Officer (CECO), reporting directly to the CEO and Board of Directors and will remain independent of both legal and human resource functions.

The I & I Unit will optimize case management strategies and be dedicated to a survivor centered approach. The Safeguarding investigation team will include a case manager and a team of lead investigators supported by our in-country Co-investigators (figure 1).<sup>12</sup> Safeguarding co-investigators are a critical part of our investigative response and play a vital role in our ability to offer survivor centered support and timely response in-country when needed. Co-investigators undergo SEA specific investigations training and work under the direction of lead investigators. They also engage with safeguarding focal points to make connections between survivors and the support services identified in our community resource maps. Co-investigators have proven to be an invaluable resource during the travel restrictions imposed by the Covid-19 pandemic, enabling us to more seamlessly pivot to remote investigations.

The I&I Unit, while independent, will work closely with the prevention-focused Global Safeguarding Team to increase awareness and access to reporting mechanisms and use report data analysis and learnings to adapt our safeguarding prevention efforts agency-wide. At the board level, we have created a new Joint Ethics and Safeguarding Committee to oversee ethics, compliance and culture relating to safeguarding and gender diversity and inclusion beginning in FY21.

## Response and Incident Related Data for FY20

As awareness of and trust in our reporting mechanisms increased, the number of reported cases has also risen from FY19 to FY20 as reflected in the data below. We continue to interpret this as a reflection of growing confidence in our reporting and response systems. We know that underreporting of SEAH cases is endemic in our sector and beyond. We will continue to reinforce messaging of zero tolerance for exploitative or harassing behavior, and make it clear that allegations of such conduct can and will be safely investigated. In time, we hope to see the number of cases reduce due to effective prevention efforts.

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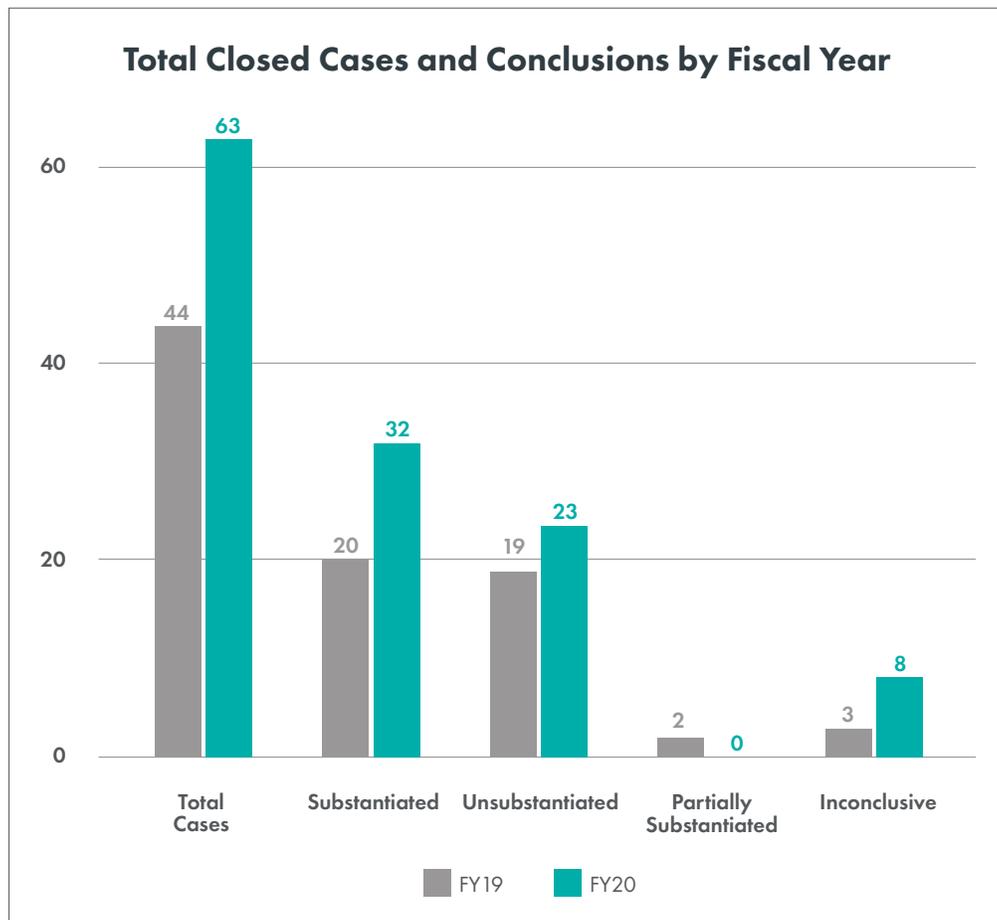
<sup>10</sup> See Annex C for Mercy Corps' nine CARM minimum standards.

<sup>11</sup> All Code of Conduct related allegations must be handled by this designated unit including fraud and corruption, sexual exploitation and abuse, sexual misconduct, and HR issues that fall within the scope of our Code of Conduct.

<sup>12</sup> When needed, and for cases involving senior leaders, we engage external expert investigators.

In fiscal year 2020, Mercy Corps received a total of 73 safeguarding-related reports, including 24 against partners, and 49 against Mercy Corps team members. Four of these involved conduct of team members prior to their engagement with Mercy Corps. In addition, we received three reports regarding sexual violence within the community that involved neither Mercy Corps staff nor partners, but where we provided support to survivors or notified law enforcement as appropriate. As of September 1, 2020, 63 of the FY20 cases have been resolved (either closed or pending closure). Of the 10 remaining under investigation, four allegations are against partners.<sup>13</sup>

Of the 63 closed or pending investigations, 23 were unsubstantiated, 32 were substantiated, and 8 were inconclusive (figure 2).<sup>14</sup> All substantiated cases resulted in disciplinary action, including 25 terminations of employment or partner contract and 8 disciplinary actions other than termination. In all substantiated cases involving exploitation or abuse of a participant or community member, the team member or partner was terminated and is ineligible for rehire or renewal of contract. That ineligibility will be shared with prospective employers when asked.

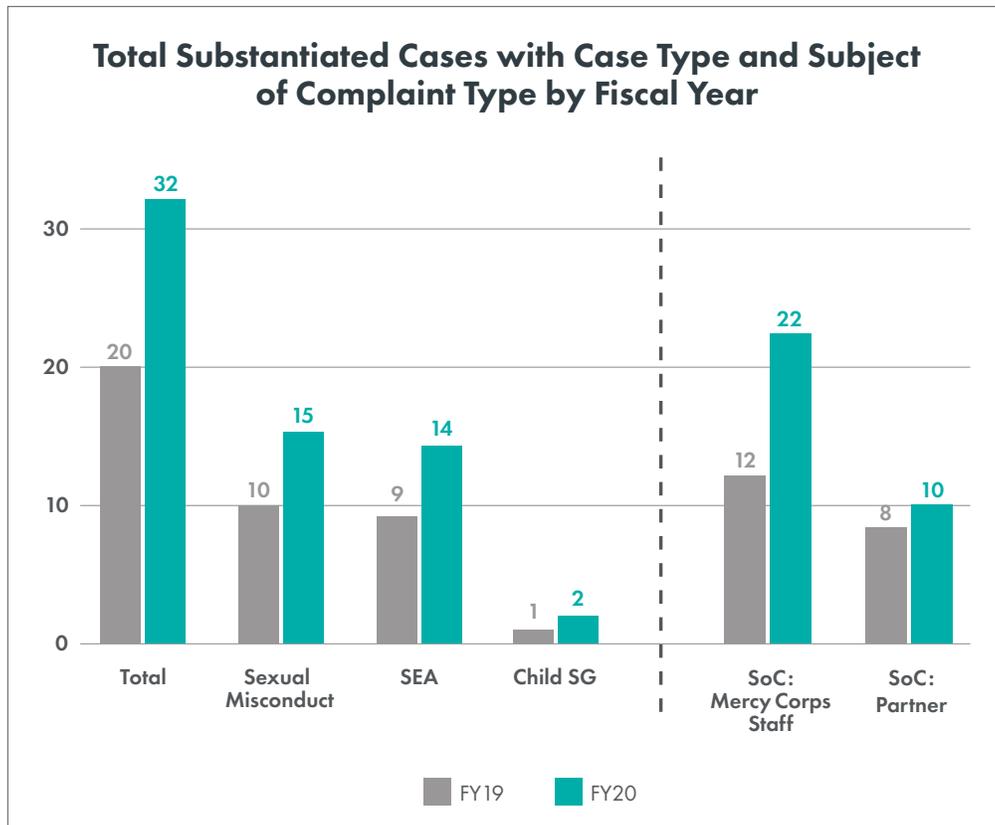


**FIGURE 2:** Total number of closed cases for fiscal year 2019 and fiscal year 2020 broken down by the case conclusions. For definitions of each case type listed, see Annex A.

<sup>13</sup> Some investigations have been delayed due to the impacts of the Covid-19 pandemic.

<sup>14</sup> See Annex A for case resolution definitions.

Of the 32 total substantiated cases, 14 involved internal sexual misconduct (team member to team member) of varying degrees, which includes undisclosed relationships. Twelve cases involved sexual exploitation or abuse, which includes procuring commercial sex and sexual contact with children under 18. Two cases involved non-sexual child safeguarding, and one case involved non-sexual physical harm of an adult (figure 3). Three cases involve historical misconduct of staff members prior to their involvement with Mercy Corps.<sup>15</sup>



**FIGURE 3:** Total number of substantiated cases in fiscal year 2019 and fiscal year 2020 broken down by case type as well as subject of complaint (SoC) type. Definitions for case types and subject of complaint types can be found in Annex A.

## Reflect and Adapt: A Data Informed Approach

Mercy Corps takes a data driven approach to our safeguarding efforts. Through the analysis of data, we are learning and adapting, identifying trends, and enabling more informed and effective decision-making to improve our efforts. At the end of a safeguarding investigation, we analyze the specific conditions that existed and consider implications that stem from that analysis—from recruitment and hiring, to onboarding and training, to program management, to the reporting and investigation process—looking for ways we can prevent similar situations from occurring and improve our response if they do.

<sup>15</sup> In these cases we did not investigate the underlying conduct, but rather the existence of substantiated allegations at other organizations or with law enforcement.

In addition to investigation analysis, we use case data to identify broader trends, spot risks, and identify areas for process improvements. To that end we have established a new, cross-functional Global Safeguarding Task Force (GST) to expand the role of our previous Safeguarding Working Group. The Task Force consists of multiple stakeholder representatives from across the agency representing different functions, departments, and regions. Beginning in the second quarter of FY21, the Task Force will partner with the safeguarding team in review of high level incident data<sup>16</sup> and will support the analysis of lessons learned, identification of risks, and review of relevant processes and systems in order to ensure meaningful adaptation and improvement.

## Reflections on Fiscal Year 2020 Data

There are several reflections we can share from our review of FY20 case data. First—while we have seen increased reporting in several locations following awareness raising around reporting mechanisms—in other locations reports have not increased. We know underreporting is an endemic issue, therefore additional research and follow up is needed to ensure community members and participants understand their rights and feel safe in reporting concerns. Second, we know we have areas to strengthen with respect to safeguarding in our partnerships, particularly around recruitment and training of temporary workers.<sup>17</sup> This is a key focus for FY21. Third, we have seen the impacts of Covid-19, both in terms of the pace of reports received (which declined during times of lockdown,) and in the nature of reports, which reflect the well known risks of increased domestic and intimate partner violence during the pandemic.

Finally, we have seen significant improvements in our response to incidents as the result of our investment in our safeguarding co-investigators and focal points. Team members are coming to our focal points to report concerns. We are better able to connect survivors with meaningful support resources and ensure our engagements with them are survivor centered and limited to one point of contact. Our in-country co-investigators are available to assist remote investigators, improving investigation response time, contextual understanding, communications, and providing a more comfortable experience for all parties. Co-investigators have helped immensely with the shift to remote investigations necessitated by the Covid-19 pandemic. They have also expanded our ability to reach remote locations.

## Looking Forward

Unaddressed exploitation and abuse have caused a deep legacy of harm in our sector and resulted in trauma for untold numbers of survivors. Much work remains to prevent further harm and address that legacy. Mercy Corps is deeply committed to contributing to a safer, more accountable, survivor-focused sector where exploitation and abuse are not tolerated. With our expanded global safeguarding team in place and continuing to grow, we are committed to strengthening practices, systems, policies and workplace culture across our programs, with our partners, and in the communities we serve.

We believe safeguarding is the responsibility of each and every Mercy Corps team member and partner, and of each member of our sector as a whole. We will continue our work to ensure that all those affiliated with our agency understand that responsibility and have the resources and knowledge to act upon it. Together, we are committed to ensuring everyone we come into contact with is treated with the respect and dignity they deserve.

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<sup>16</sup> This review will not involve any identifying information to protect the confidentiality of our investigative process.

<sup>17</sup> See Annex A for definitions of employment type.

# Annexes

## Annex A: Referenced Definitions (in alphabetical order)

- › **Child Safeguarding (CS) Case:** Includes allegations of physical, emotional, or sexual abuse, or otherwise putting children at risk of harm.
- › **Community Accountability Reporting Mechanism (CARM):** CARM is a channel for any and all community members to provide feedback, suggestions, complaints, and concerns, in a manner that is safe, confidential, transparent, and accessible, enabling Mercy Corps to respond and make any necessary programmatic or safeguarding adaptations and to ensure the safety, security, and empowerment of program participants.
- › **Inconclusive Case:** Where we are unable to obtain sufficient evidence to make a determination around substantiation, for example because the report is by an anonymous third party and/or does not identify a particular survivor or subject of complaint. In such cases we take whatever action possible to investigate in a survivor sensitive way, and to provide opportunities for other complaints to be raised. In addition, we review programs and systems to ensure they meet our safeguarding standards and that team members, participants, partners and community members understand their rights and how to report concerns.
- › **Partially Substantiated Case:** Some, but not all of the allegations are substantiated. This category of finding was used up until the first half of 2019. For FY20 and going forward, we consider an allegation substantiated if any safeguarding violations were substantiated.
- › **Partners:** Sub-grant recipients, partner organizations, contractors, outside experts, consultants, agents, representatives, and any other organization or individual that acts on Mercy Corps' behalf or at Mercy Corps' direction.
- › **Pending Case:** Where the investigation is complete and a finding has been made but where we have outstanding corrective and/or reporting actions to implement and finalize.
- › **Safeguarding Allegation:** We consider safeguarding allegations to include allegations of sexual exploitation and abuse, internal sexual misconduct (including sexual harassment), child safeguarding and human trafficking.
- › **Safeguarding Champion:** Safeguarding Champions have a similar role to Safeguarding Focal Points raising awareness and producing community resource maps which are used as part of our survivor support practices and service referral process. Safeguarding Champions work at a reduced technical capacity and are not a replacement for focal points. They are an important addition to our global safeguarding team and supplement our in country support surrounding safeguarding prevention efforts.
- › **Safeguarding Co-Investigator:** Safeguarding Co-Investigators act as in-country investigative support when allegations of safeguarding violations are reported. They provide local contextual information, translation, and facilitate investigation planning, communication, and implementation. With guidance and supervision from full time lead investigators, the co-investigators may take on-the-ground investigative action including participating in interviews, examining evidence, and reviewing relevant documents.

- › **Safeguarding Focal Point:** Safeguarding Focal Points are in-country resources for safeguarding, working with their team members to build trust and confidence in our reporting mechanisms. They also provide on-the-ground information and feedback to help inform our agency-wide safeguarding strategy and approach. Focal point training includes survivor-centered approaches to incident responses, referral pathways, community resource mapping, international safeguarding standards, community and team member reporting, safeguarding risk assessment, and other related skills.
- › **Sexual Exploitation and Abuse (SEA) Case:** Allegations of sexual exploitation and abuse of participants in our programs or other community members including: actual or attempted abuse of position of vulnerability, power differential, or trust for sexual purposes; profiting monetarily, socially, or politically from the sexual exploitation of another; exchange of assistance for sexual or romantic relations; sexual abuse of program participants or community members; and paying for sex or sexual acts.
- › **Sexual Misconduct (SM) Case:** Allegations that include instances of sexual misconduct in the workplace, including sexual harassment (quid pro quo or work environment) and sexual assault. Also includes undisclosed relationships along reporting lines.
- › **Substantiated Case:** Where the investigation concluded that it is more likely than not that the violation occurred.
- › **Team Member:** All team members globally, including Mercy Corps' Boards of Directors, executive officers, management, employees/team members, seconded employees, temporary staff, interns, and volunteers.
- › **Temporary Workers:** Individuals hired on short term contracts as part of a program (included in broad definition of team member above)
- › **Unsubstantiated Case:** The available evidence was insufficient to conclude that it is more likely than not that the violation occurred.
- › **Visitors:** Visitors to Mercy Corps facilities, including photographers, filmmakers, journalists, researchers, donors and prospective donors, and anyone else hosted by Mercy Corps or visiting Mercy Corps' implemented or financially supported programs.

## Annex B: Relevant Links and Referenced Documents

- › [Mercy Corps Website](#)
- › [External Investigation & Commitments to Action](#)
- › [Timeline of Actions](#)
- › FY 19 Global Safeguarding Report, [Part I](#) and [Part II](#)
- › [Mercy Corps Policies and Policy Guidance Documents](#)

## Annex C: CARM Minimum Standards

1. CARM focal points are designated at the country and program level. The country CARM focal point is responsible for the management and quality of CARM for the Country and is responsible for leading the design and implementation of CARM.
2. CARM is budgeted for in all programs. Every program will have budget lines allocated for community accountability.
3. CARM standard operating procedures are completed and approved. Use the provided SOP template and once completed, send to [carm@mercycorps.org](mailto:carm@mercycorps.org) for technical review. The Country director must approve the final SOP.
4. Every active program has 3 feedback channels and community members are sensitized on their purpose and availability. Feedback channels must be set up within 90 days of program start up. When operating remotely or with reduced access and face-to-face feedback can't be collected, 2 feedback channels are allowed.
5. All feedback is documented and managed in a CARM database. Access to the database will be restricted to the team members who are responsible for documenting feedback in order to protect the identity of informants.
6. Feedback is classified according to six standard Grades and grading is verified. Only specific, designated team members will have the authority to grade feedback, and these team members will be selected by the Country Director in consultation with the country CARM focal point.
7. Appropriate action is taken for all feedback based on Grade. After a Grade is assigned to feedback, appropriate action must be taken based on that Grade. Appropriate action and segregation of duties will be outlined in the CARM SOP.
8. All grade 5 and 6 feedback is reported directly to the Integrity Hotline and the informant's identity is protected. The Country Director and country Safeguarding Focal Point (Grade 6 only) can be copied if the feedback does not implicate them.
9. The feedback loop is closed for all non-anonymous feedback. The person who shared the feedback must be informed of the resolution of their case for 100% of feedback that is not submitted anonymously.

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### About Mercy Corps

Mercy Corps is a leading global organization powered by the belief that a better world is possible. In disaster, in hardship, in more than 40 countries around the world, we partner to put bold solutions into action — helping people triumph over adversity and build stronger communities from within. Now, and for the future.



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