GLOBAL SAFEGUARDING REPORT

FISCAL YEAR 2022

MERCY CORPS

Message from the CEO

I am pleased to share Mercy Corps' fourth annual Global Safeguarding Report. We have published this report yearly since 2019 to provide transparency around the number of safeguarding allegations we receive, the resolution of investigations into those allegations, and our ongoing efforts to strengthen our prevention and response to safeguarding incidents.

In my second year as CEO, I am heartened to see our investments in safeguarding reporting and response systems paying off with more timely investigations and case closures and a deep commitment to survivors throughout the process. I am also pleased to see that important in-person training for safeguarding support staff has resumed. This, alongside the prioritization of safeguarding roles at the regional level, is helping to further strengthen our safeguarding efforts where they are most needed. This year we continued to prioritize our commitment to physical and psychological safety within our teams and programs, and our efforts around diversity and inclusion. These priorities underpin our approach to safeguarding prevention and response. We believe that we are a stronger, more effective, and safer organization when people feel included, represented, and comfortable speaking out.

As I have previously noted, there is no finish line when it comes to safeguarding – which requires continuous effort and commitment on the part of everyone who works with us and on our behalf. Our vision is a sector that is safe and free of exploitation and abuse of any kind. By transparently sharing our efforts, our progress, and the challenges we still face in this report, we intend to contribute to continuous improvement not only for Mercy Corps, but also for the broader humanitarian and development sector.

With gratitude,

Tjada D'Oyen McKenna
Mercy Corps CE

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Introduction

At Mercy Corps, we tirelessly seek solutions to the world's toughest problems. We support communities – and the most marginalized within them – to emerge from crisis and build a more inclusive, resilient future. **Our mission is to alleviate suffering, poverty, and oppression and help people build secure, productive, and just communities.** In more than 40 countries around the world, nearly 6,000 Mercy Corps team members work side by side with people living through poverty, disaster, violent conflict, and the acute impacts of climate change. We're committed to creating global change through local impact – 85 percent of our team members are from the countries where they work.

We believe that freedom from exploitation, abuse, harassment and trafficking are fundamental human rights and we are deeply committed to the safety and well-being of the communities, program participants, partners, and team members across the countries in which we work. We strive continuously to create an inclusive and safe operating environment, where everyone is treated with care, dignity, and respect.

We are committed to transparency and began publicly sharing data around our safeguarding allegations and investigations in 2019.[1] With this publication we continue our annual reporting of case data and updates on our safeguarding progress[2]. As always, our public reporting prioritizes respect for and confidentiality of survivors.

Executive Summary

This annual report outlines Mercy Corps' safeguarding strategy, status updates, and incident-related data for fiscal year 2022 (FY22).[3] The report is divided into three main

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[1] 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 underline website.
[2] Our Global Safeguarding Reports can be found on our website.
[3] Fiscal year 2022 includes July 2, 2021- June 30, 2022.

sections: our safeguarding commitment; governance and leadership; and our safeguarding approach. We also provide an overview of our progress in FY22 and our priorities for FY23.

Detailed data on our case numbers is provided in the "Reporting and Response" section below. In FY22, we investigated 61 safeguarding allegations. As of October 15, 2022, 60 of these reports have been closed: 17 were substantiated, 32 unsubstantiated, 11 were inconclusive.[4]

Safeguarding is a critical priority for Mercy Corps and core to our fundamental commitment to a safe, diverse, and inclusive culture that protects, enables, and elevates marginalized groups. In FY22 we continued to expand and strengthen both our prevention of and response to safeguarding violations. We know that across our sector much work remains to ensure that everyone is safe, included, and free from exploitation and abuse of any kind. We remain deeply committed to continuing to progress as an accountable, survivor-focused organization where everyone is treated with dignity and respect.

Our Commitment

As a global humanitarian organization serving the world's most vulnerable communities, we take our responsibility to program participants, partners, donors, and team members across the countries in which we work seriously. We acknowledge our position of privilege and the relative power of our team members and are committed to responsibly managing that privilege to ensure that we never cause harm. We believe that sexual exploitation, abuse, and harassment are human rights violations. Any form of abuse, exploitation, or trafficking directly contradicts the principles upon which our humanitarian work is based and can cause deep and lasting harm to children or adults who experience it. Mercy Corps has zero tolerance for abuse or exploitation and is committed to ensuring physical and psychological safety within our teams and our programs.

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[4] See Annex A for definitions of substantiated, unsubstantiated and inconclusive cases and information about how we follow up on each.

We link safeguarding closely to organizational initiatives around localization, inclusion, and internal diversity and equity. We understand that we must continue to do more to ensure the most marginalized people within the communities where we work are aware of their rights and how to safely report concerns. We know that diverse, representative teams, where people feel comfortable speaking up and speaking out, are a necessary foundation for safeguarding. We are committed to collaborating with our peer and partner organizations around our shared commitment to ending abuse and exploitation and to engaging with community members and local organizations that support and elevate the voices of survivors.

Safeguarding is an ongoing commitment; it requires continuous effort and attention on the part of everyone who works with us or on our behalf. We are dedicated to prioritizing this effort, doing all we can to prevent misconduct from occurring, ensuring meaningful access to safe and trusted reporting pathways, and employing a timely, survivor-centered response should an incident occur.

Safeguarding Governance and Leadership

From 2019 to 2021, Mercy Corps significantly restructured and strengthened its governance and ethics functions by creating and funding a stand-alone Ethics and Compliance Department (ECD) and providing expanded resourcing for safeguarding prevention and response. Since then, we have continued to build on that foundation.

Mercy Corps' ECD is led by our Chief Ethics and Compliance Officer (CECO), Steve Linick, who reports directly to the CEO and to the Board of Directors. At the Board level, the Joint Ethics and Safeguarding Committee, led by current chair Emmanuel Lulin, provides safeguarding oversight.

The ECD oversees implementation of an ethics program designed to prevent, detect, and respond to illegal, unethical, or improper conduct, including safeguarding violations, and promotes a culture of integrity throughout the organization. The ECD is responsible for

responding to all reports of ethics violations including fraud, corruption, safeguarding misconduct, and human resources (HR) misconduct relating to our Code of Conduct policies. Our Case Intake Manager oversees our complaint hotline, and our Director of Safeguarding Investigations oversees a team of regionally-based lead investigators and in-country Co-Investigators who are trained in sexual exploitation, abuse, and harassment (SEAH) investigations. We employ separate teams of investigators who respond to fraud and HR Code of Conduct allegations.

Our Safeguarding Approach

We define safeguarding as our responsibility to ensure team members, operations, and programs do not harm those with whom we work or put vulnerable populations at risk of abuse or exploitation. Safeguarding at Mercy Corps is an umbrella term covering the prevention of and response to sexual exploitation and abuse of children or adults, physical or emotional abuse or neglect of children, human trafficking and exploitation, and internal sexual misconduct.[5] Underpinning all of our safeguarding work is a commitment to a survivor-focused approach. The safety, well-being, and perspectives of survivors are at the core of our efforts.

Our approach is founded on three broad pillars:

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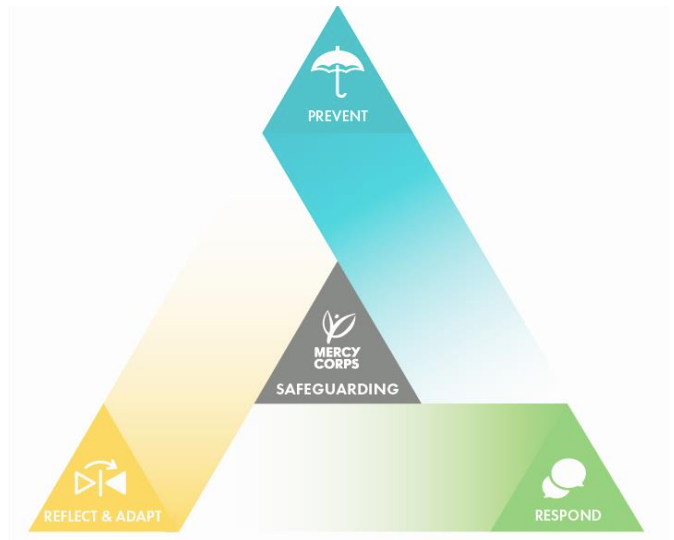
[5] For definitions of these and other terms see Annex A on page 20.

- **Prevent** safeguarding violations, through strong policies, safe hiring practices, onboarding, training and effective management, and mainstreaming safeguarding into our culture and throughout our programs and partnerships.

- Maintain a robust and trusted **response** system with a variety of safe and accessible reporting channels and timely, thorough, survivor-centered investigations.

- Use **data,** lessons learned from each investigation, reporting trends and patterns, and evolving sector best practice, to **reflect and adapt** in order to continually strengthen our safeguarding systems.

Prevention

Our fundamental safeguarding goal is to avoid any harm to our team members, participants, partners, or community members, and to ensure that everyone who interacts with Mercy Corps is treated with dignity and respect. We seek to use every means possible to deter individuals from committing offenses, prevent opportunities to cause harm, and identify risk and mitigate it appropriately. To do this, we continue working to integrate safeguarding prevention measures throughout our programs and functions. Key prevention priorities detailed in this section include: effective safeguarding policies; well-resourced and trained safeguarding expertise; safe recruitment, hiring, and onboarding; capacity building and awareness raising; partner accountability; and ensuring appropriate resources and processes to mainstream safeguarding through our programs and operations. Underpinning all of this is our commitment to creating a diverse, inclusive, safe, and accountable organizational culture. We strive to respect human rights at all times, minimize inequitable power dynamics, address the systems that perpetuate discrimination and abuse of power, and prioritize a culture of integrity and accountability, internally and in our programming.

Effective and Comprehensive Safeguarding Policies and Standards

We review our safeguarding policies regularly to ensure they reflect evolving sector best practices, donor requirements, and organizational priorities. We incorporate learnings from case investigations, and feedback from team members and communities to ensure our policies are clear, effective, and reflect the needs and voices of survivors. In FY22, we undertook a comprehensive external review of our safeguarding and whistleblower policies. The review was conducted by an external organization with particular expertise in PSEA, child safeguarding, and modern slavery/ anti-trafficking. The goal was to streamline our policies and ensure they are as forward thinking and comprehensive as possible. We are integrating the learnings and recommendations from this process and will be updating our policies in FY23.

In addition, we are finalizing a stand-alone Safeguarding Core Standards Policy, which will pull all of our safeguarding commitments— at the program and operational levels—into one global framework for the first time, with clearly articulated outputs and responsibilities. Our goal is to ensure that our safeguarding policy standards are as robust and clear as possible, will function cohesively together, and are clearly embedded in existing processes and workstreams.

Trained Global and In-Country Safeguarding Expertise

Ensuring we have sufficient safeguarding expertise and support, both globally and locally, is an ongoing priority. Our dedicated global safeguarding team continues to expand; funding was approved in June for five additional Regional Safeguarding Advisors in Asia, the Americas, East Africa, West Africa, and the Middle East. We are finalizing recruitment for these roles and are looking forward to having representatives from and based in the regions to provide closer guidance to country teams. We are also recruiting a Safeguarding and Inclusion Advisor in Europe to continue to advance our efforts to engage in European safeguarding networks and with peer organizations.

At the country level, we have trained Safeguarding Focal Points and Champions who engage directly with teams and programs at a local level. Focal Points and Champions work with their teams to raise awareness, deliver face-to-face[6] training to team members, and provide support to team members around integrating safeguarding activities into programs. They are trained in survivor-centered principles and are available as a direct reporting channel for individuals with concerns. Focal Points and Champions create and maintain a database of community resources for survivors, assist in liaising with survivors when needed, and serve as a referral pathway for those in need of medical, psycho-social or other support.

Like many organizations in the sector, we face challenges around staff turnover and have lost some of our previously trained Focal Points. Although we pivoted in FY21 to primarily hosting remote training of Champions, we were again able offer in-person Focal Point and Co-Investigator training in June, following a two year hiatus due to the COVID-19 pandemic. We will be training another in-person cohort of Focal Points and Co-Investigators in January 2023. We have safeguarding support roles active in all of our country programs, with a total of 28 Focal Points, 90 Champions, and 22 Co-Investigators.

Mercy Corps Active In-Country Support By Region

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[6] Where in-person sessions are not available or safe due to COVID-19, remote, live sessions using online streaming methods are used.

Figure 1. The total number of in-country safeguarding support staff broken down by region and type. Definitions of each role can be found in Annex A.

Safeguarding Capacity Building and Awareness Raising

Ensuring team members have the knowledge and understanding to both refrain from and help prevent exploitation and abuse is an ongoing imperative. This requires more than just mandatory safeguarding onboarding training. We believe face-to-face training delivered by someone from the local context is critical. This is one of the key functions of the local safeguarding support roles described above. Safeguarding Champions and Focal Points are tasked with delivering at least one training per month, ensuring that knowledge remains fresh and that new team members are reached. These awareness raising sessions are anchored in relevant program and cultural contexts, and Champions and Focal Points are available to answer questions both in group settings and individually. Training is delivered in person where possible and remotely where circumstances dictate.

In addition to training, we employ a regular cadence of ongoing safeguarding and ethics communications across the organization in a variety of languages to ensure that team members are aware that they trust and understand our safeguarding processes, understand that leadership prioritizes safeguarding, know the importance of speaking out if they see something concerning, and can easily access reporting channels. These communications include annual Ethics Week, informal question and answer sessions, newsletters, emails, and a WorkPlace video series called "Let's Talk Ethics" in which challenging or complex ethics issues are discussed in an accessible manner for the benefit of team members.

Safe Recruitment, Hiring, and Onboarding

We are committed to preventing abusers from moving throughout our sector. In 2021, we signed onto the Inter-Agency Misconduct Disclosure Scheme, a collaborative effort of over 140 peer organizations to prevent known perpetrators of sexual exploitation, abuse, and harassment from moving to different organizations across the sector. We now implement the scheme in all headquarters and international hires and are rolling it out for local country office hires in FY23. We continue to strengthen our recruitment and hiring processes in other ways 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. All Mercy Corps position descriptions include safeguarding language, and applicants must affirm that they have no substantiated allegations or investigations against them. We strive to incorporate safeguarding questions into interviews and reference checks and continue to train hiring managers and recruiting personnel around safeguarding. Team members sign our Code of Conduct upon hire and must complete mandatory Code of Conduct training during their first 30 days of employment and annually thereafter. These interactive trainings include specific units on our different safeguarding policies. In order to pass, participants must demonstrate an understanding of expected standards of behavior, reporting obligations, and how to report concerns.

Partner Accountability and Shared Commitment

As an organization, we are committed to localization— to intentionally shifting power and decision making to the communities where we operate. Engaging local partners is a key element of our localization strategy. We work with local and national actors who share our commitment to humanitarian principles and to the prevention of all forms of abuse, exploitation, and harassment, and we hold our partners to the same safeguarding standards as our team members, including via contractual commitments in our partnership agreements. We are working to ensure that all those with whom we work understand our safeguarding commitments and agree to abide by them. Over the past fiscal year, we have piloted more robust, comprehensive processes and tools for vetting, monitoring, and supporting different types of partner organizations, including short-term emergency partnerships and longer-term partnerships.

Resources to Mainstream Safeguarding Organization-Wide

Ensuring safeguarding is integrated into the design and execution of our projects and programs is a key priority. This work overlaps with the efforts of our protection and gender teams who work to improve the safety, dignity, and inclusive access of individuals and communities where we work. Our Safeguarding Core Standards will address this, and we are working to recruit another team member specifically to support us in integrating safeguarding budgets more thoroughly into our program proposals and ensuring that safeguarding is taken into account throughout the life cycle of all projects.

Culture Building and Gender, Diversity and Inclusion

Our Gender, Diversity, and Inclusion (GDI) and safeguarding initiatives are closely intertwined. We know we are at our best when we bring the full diversity of our identities, experiences, and perspectives together to tackle the world's most complex challenges. We are committed to creating a psychologically and physically safe and inclusive workplace and programs by listening to one another and actively challenging and addressing unequal

power dynamics within our organization. When our teams are representative of the communities we work with, community voices are more easily accessed and centered, and people feel more comfortable reporting concerns. An organizational culture that safeguards everyone who comes into contact with it—whether team members, partners, program participants, or members of the community we work with—can only be achieved when equity, inclusion, and belonging are embedded in that culture. The work led by Mercy Corps' GDI team is at the foundation of our safeguarding culture.

Our GDI and other related initiatives support our safeguarding efforts by:
- Ensuring that our teams are more representative of the diverse communities where we work;
- Ensuring more representative leadership through diversity targets for our global senior leadership, executive team, and Board;
- Supporting our teams globally to examine power and mitigate factors that lead to inequitable power dynamics through a comprehensive GDI diagnostic process;
- Reforming Mercy Corps' organizational and management practices and policies to foster a more equitable and inclusive working environment for all team members, particularly those from historically-excluded groups;
- Our organization-wide internal training program "People with Possibility" is designed to help teams become learning-oriented, adaptive, and high-performing by building a strong foundation of trust and psychological safety. This 12-week training supports managers and their teams in utilizing practices that empower teams, build trust, demonstrate care, and foster inclusion.

In addition, to help us grow and measure progress, this year Mercy Corps launched its first All Voices employee survey to provide team members an anonymous forum to give feedback on, among other things, their sense of Mercy Corps as an inclusive, diverse, and ethical organization.

Reporting and Response

We significantly strengthened our safeguarding reporting, response, and investigation operations in FY22. In April, we launched our newly streamlined Integrity Hotline web portal, expanded the languages and coverage of our reporting phone lines, and provided our Safeguarding Investigations team with a purpose-built case management system.

Reporting Mechanisms

Trusted, accessible, and well-understood reporting channels are fundamental to safeguarding. We have continued to invest in and strengthen our internal and external reporting mechanisms, providing a variety of options for individuals to report concerns in ways that feel comfortable for them.

For community members and program participants, we provide accessible and locally-relevant Community Accountability Reporting Mechanisms (CARMs).[7] CARM implementation has been a key organizational priority over the past two years and locally relevant, contextual CARM systems are now operational across our locations and programs. Our global CARM Policy outlines nine minimum standards for community accountability and clear requirements for partners.[8] All Mercy Corps country programs and entities are required to meet the standards within this policy to ensure a consistent, quality approach to community accountability, while maintaining responsiveness to community needs and perspectives.

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[7] 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.

[8] See Annex D for Mercy Corps' nine CARM minimum standards

We provide a number of internal reporting channels to ensure that team members have an option that works for them, in the language of their choice. Team members may report directly to the Mercy Corps Integrity Hotline via email in any language. Our updated Integrity Hotline web portal and the expanded coverage of our Integrity Hotline phone lines[9] provide a streamlined multilingual end-user experience that allows for confidential reporting with the option to report anonymously. Team members may also report safeguarding concerns directly to CARM, management, Human Resources, or Safeguarding Focal Points and Champions, who are required to report immediately to the Integrity Hotline.

We know from research in the sector,[10] that many incidents of exploitation and abuse remain unreported and that survivors face significant barriers to reporting in many of the contexts in which we work. Our CARM systems received triple the number of safeguarding reports during FY22 compared to FY21, which we believe is an encouraging sign that awareness and trust of our systems is expanding.

Incident Response and Investigations

We are committed to a timely, thorough, and survivor-centered response to all safeguarding allegations and due process for subjects of complaint. We have made significant investments to develop our incident response capacity this year. Our Safeguarding Investigations team is part of the Ethics and Compliance Department and reports to the CECO. A diverse, multilingual team of trained sexual exploitation, abuse, and harassment investigators are based in regional hubs and report to our Director of Safeguarding Investigations.

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[9]Our Integrity Hotline reporting web portal is hosted by i-Sight, a third-party platform with 24/7 access. Our Integrity Hotline phone lines are available 24/7 and hosted by Convercent, a third-party contractor.

[10] See for example: Safeguarding Resource Support Hub, Summary: Barriers to reporting on Sexual Exploitation, Abuse and Sexual Harassment (SEAH)

The Safeguarding Investigations team is supported by our in-country Co-Investigators (see Figure 1, above).[11] Safeguarding Co-Investigators are an important part of our investigative response and play a vital role in our ability to offer survivor-centered support and timely in-country response when needed. Co-Investigators undergo SEAH-specific investigations training and work under the direction of lead investigators. Co-Investigators engage with Safeguarding Focal Points to make connections between survivors and the support services identified in our community resource maps. Co-Investigators have become an invaluable resource enabling us to manage remote investigations with on-the-ground support.

To continue strengthening and ensuring proper oversight of our investigations, we procured and developed a purpose-built case management system during FY22. The new system provides secure storage for all safeguarding case file materials, ensures managers have proper oversight for all investigations, and allows the investigations team to monitor safeguarding reporting trends. Improving our ability to monitor patterns in reporting assists in guiding our prevention and response efforts.

These improvements and investments in our response function are proving effective. In FY20, our average time to close a case was 144 days. In FY21, the average case closure period was 97 days. In FY22, the average case closure period was reduced to 85 days. Our goal is to close cases within 90 days, although our commitment to a thorough and survivor-sensitive process sometimes necessitates a longer time period.

Response and Incident-Related Data for FY22

In FY22, Mercy Corps received a total of 100 reports originally described as safeguarding-related. After a preliminary review, not all of the reports constituted potential violations of Mercy Corps' safeguarding policies or were even related to Mercy Corps' programs or people. As of October 15, 2022, 99 of these reports have been reviewed and closed. Thirty-nine were closed after a preliminary review, meaning that the review showed insufficient

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[11] For cases involving executive team or Board members, we engage external expert investigators.

evidence to proceed with an investigation, were referred, or involved a non-safeguarding claim.[12] We investigated a total of 61 cases. A total of 13 cases involved minor survivors (eight non-sexual child safeguarding cases and five sexual exploitation/abuse cases). Two allegations involved issues of misconduct by team members while at other organizations, prior to their engagement with Mercy Corps.[13] Of the 61 cases we investigated, 17 were substantiated, 32 unsubstantiated, 11 were inconclusive, and one is pending. The substantiated cases included 16 against team members and one against a Mercy Corps partner. All substantiated cases resulted in disciplinary action, including 14 terminations of employment or contracts. In all instances, team members who were terminated became ineligible for rehire and contractors became ineligible for further awards or future contracts. Former team members' ineligibility status will be shared with prospective employers, including through the Inter-Agency Misconduct Disclosure Scheme. In all substantiated cases involving exploitation or abuse of a participant or community member, the team member or partnership was terminated.

In all allegations involving an identified survivor, we offered support to those survivors, regardless of whether they wished to be involved in an investigation, and whether or not the allegation involved a Mercy Corps team member or partner. Types of support provided included medical, psycho-social, and support in accessing legal services.

Of the 17 total substantiated cases, seven involved internal sexual misconduct (team member to team member) of varying degrees, including undisclosed relationships. Four cases involved sexual exploitation or abuse. Four cases involved child safeguarding. One case involved human trafficking. One case involved sexual misconduct of staff members

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[12] See Annex A for case resolution definitions.

[13] In these cases, we were able to utilize the Misconduct Disclosure Scheme (MDS) as an investigative resource to gather information on the historic allegations which resulted in the termination of two employees. We note that at the time of hiring the prior organization of the two employees was not participating in the MDS.

while employed at a prior organization (we characterize these incidents as "historical SEAH"). Figure 3 below breaks down the substantiated cases by type and fiscal year.
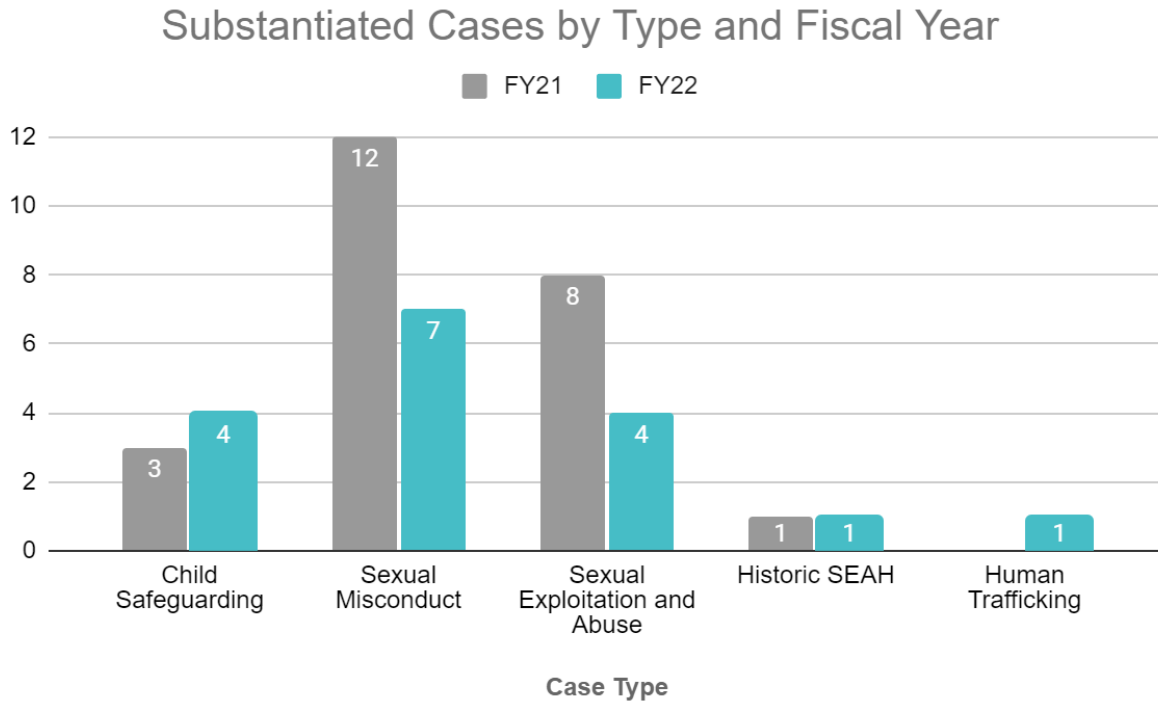

Substantiated Cases by Type and Fiscal Year

Figure 2. Total number of substantiated cases in fiscal year 2021 and 2022 broken down by case type. Definitions for case type can be found in Annex A.

Reflections on Fiscal Year 2022 Data

We continued to see an increase in the use of our reporting channels during FY22. We have focused heavily on raising the awareness of reporting mechanisms this past year, and our messaging emphasizes team member and partner obligations to report any good faith concern, whether personally or anonymously, without attempting to gather information or investigate the allegations. This has likely resulted in a higher number of reports that are not actually safeguarding allegations and a higher proportion of allegations that are ultimately unsubstantiated. We always want our team members to err on the side of

reporting. In all cases, we take whatever steps are possible to inquire into the circumstances surrounding a report. Even where we do not have sufficient specific facts to investigate, we attempt to take other action, such as providing advice or referrals, reviewing systems and practices, and ensuring that potential survivors understand how to come forward. In cases where allegations are unsubstantiated or inconclusive, we take extra care to ensure that we have provided ample opportunities for participants and community members to safely report concerns, including through random sampling and survivor-sensitive outreach.

Reflect and Adapt: a Data-Informed Approach

We analyze data in order to reflect and adapt in two essential ways: by regularly reviewing overall trends and data gathered from our database of safeguarding cases and at the conclusion of each case. Our new case management system, iSight, includes customized integrated analytics tools that alert our response and prevention teams to emerging trends in our safeguarding reporting. These timely alerts help guide targeted prevention efforts and program improvement recommendations. iSight also ensures we accurately track an expanded range of data points that allow for richer data analysis and better informs our prevention efforts.

We are using our expanded collection of data to continue working with our sector partners to safely and transparently share safeguarding information. To ensure greater accountability and identify broader trends in safeguarding reporting, Mercy Corps has joined a pilot project entitled "SEAH Data Harmonization", designed to share safeguarding information across the sector and with the public. The pilot is coordinated by CHS Alliance and supported by multiple donors, including USAID and FCDO. The first phase of the pilot project runs from October 2022 to January 2023.

Finally, at the end of a safeguarding investigation, we examine the specific conditions that existed and may have made the incident more likely to occur. We make recommendations for disciplinary and corrective action and follow up with country teams on the implementation of those actions. We consider all implications that stem from our analysis of a given case—from recruitment and hiring, to onboarding and training, program design, implementation and management, to the reporting and investigation process—always looking for ways we can prevent similar situations from occurring and improve our response if they do.

Looking Forward

In FY22 we continued to build on the firm safeguarding framework we established in FY20 and FY21. Our response and investigative function is operating smoothly, with reduced case closure times and timely, meaningful support for survivors. We are seeing an increased volume of reports, suggesting that team members, partners and community members increasingly trust our hotline and CARM systems as they reach out to share their concerns. We look forward to the rollout of our Safeguarding Core Standards Policy in FY23 and to continue focus on building a safe, diverse, and inclusive culture through Mercy Corps' refreshed strategy– Pathway to Possibility.

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 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: We are unable to obtain sufficient evidence to make a determination around substantiation of the specific allegations, 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 any 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.
- Partners: Sub-grant recipients, partner organizations, contractors, outside experts, consultants, agents, representatives, and any other organizations or individuals that act on Mercy Corps' behalf or at Mercy Corps' direction.
- Pending Case: A case where the investigation is ongoing.
- 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 play a similar role to Safeguarding Focal Points by 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 safeguarding resources, 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 organization-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, team members, seconded employees, temporary staff, interns, and volunteers.

- Temporary Workers: Individuals hired on short term contracts as part of a program.

- Unsubstantiated Case: Where 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
- FY19 Global Safeguarding Report, Part I and Part II
- FY20 Global Safeguarding Report
- FY21 Global Safeguarding Report
- Mercy Corps Policies and Policy Guidance Documents
- Commitments to Action - July 2022
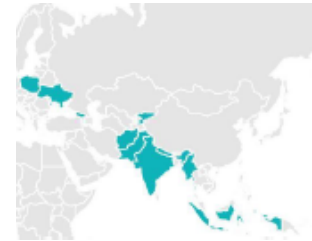
Annex C: Mercy Corps Global Footprint by Region FY22

Africa

- Countries of operation: **19**[14]
- Programs with participants in FY 2022: **115**
- Participants: **14,507,243**

Asia

- Countries of operation: **12**
- Programs with participants in FY 2022: **61**
- Participants: **4,619,716**

Middle East

- Countries of operation: **6**
- Programs with participants in FY 2021: **62**
- Participants: **6,500,068**

Americas

- Countries of operation: **5**
- Programs with participants in FY 2021: **36**
- Participants: **588,971**

Annex D: 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 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.

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[14] This number includes the countries where Agrifin operates (Tanzania, Zambia). Agrifin participants are included under "Global Initiatives" only.

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.

4. Partners and CARM Minimum Standards

   4.1. Subrecipients and equivalent arrangements

Subrecipients must have a community accountability feedback mechanism in place anytime there is direct interaction with program participants or local communities, and the Subrecipient is acting with funds provided through a Mercy Corps subaward agreement. This guidance applies to both international and local subrecipient organizations that Mercy Corps passes funding through a subaward.

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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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