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Refugee
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Turkey

Refugee Rights Turkey

Accountability to Affected Populations Framework

Approver: Ethics and Compliance Manager - Deputy Director

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MÜLTECİ HAKLARI MERKEZİ – REFUGEE RIGHTS TURKEY

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RRT ACCOUNTABILITY TO AFFECTED POPULATIONS (AAP) FRAMEWORK

1. Introduction

Refugee Rights Turkey (RRT) takes great care to implement and maintain the Inter-Agency Standing Committee's (IASC) Accountability to Affected Populations (AAP) Framework.¹ This framework is upheld through a variety of policies, internal documents, actions, and activities within the organization, and the day-to-day execution of program work.

As a non-governmental organization, RRT provides direct legal information and assistance services to refugees, asylum-seekers, and other vulnerable migrants in Turkey to increase their knowledge about their rights, the migration and asylum procedures in Turkey and guarantee their access to legal protection, and other relevant services provided by governmental or non-governmental agencies. While RRT is working with this disadvantaged group; several commitments are made to both the communities and the stakeholders who support the RRT works and activities. With this policy document, the AAP framework, which is the most important of RRT's commitments, is explained.

This AAP Framework is composed of three main sections: The first section explains the source of the standards on which RRT's accountability principles are based. Subsequently, the AAP framework within the scope of RRT's own work and activities is outlined. The final section describes how the RRT AAP framework is reviewed annually.

2. Sources of AAP Framework

Although RRT has a specific and limited interaction with the refugees, asylum-seekers, and other vulnerable migrants in Turkey (affected population) while providing legal information and assistance services, compared to organizations which directly works with communities and affected populations in the humanitarian aid sector; RRT builds its AAP framework with reference to main policy documents in refugee assistance and humanitarian aid area. The Core Humanitarian Standards and the IASC AAP Framework that RRT builds on its framework are explained below.

2.1. Core Humanitarian Standards (CHS)

The CHS set out guidelines on how organizations and individual humanitarian aid workers can improve humanitarian aid and make it more effective and efficient. The Standards further facilitate accountability to affected populations and provide mechanisms to implement Prevention of Sexual Exploitation and Abuse (PSEA).

When affected populations participate, influence, and actively engage in the program design, activities and services will be better tailored to the needs of the population and are likely to be better accessed and better support sustainability in the long term. When committing to AAP, organizations commit to use and manage the power and resources they have in a responsible and ethical way.

¹ The Inter-Agency Standing Committee (IASC) is a unique inter-agency forum for coordination, policy development and decision-making involving the key UN and non-UN humanitarian partners. The IASC was established in June 1992. The IASC develops humanitarian policies, agrees on a clear division of responsibility for the various aspects of humanitarian assistance, identifies and addresses gaps in response, and advocates for effective application of humanitarian principles. <https://interagencystandingcommittee.org/iasc-revised-aap-commitments-2017-including-guidance-note-and-resource-list>

Core Humanitarian Standard	Quality Criterion
CHS 1: Communities and people affected by crisis receive assistance appropriate and relevant to their needs.	Humanitarian response is appropriate and relevant.
CHS 2: Communities and people affected by crisis have access to the humanitarian assistance they need at the right time.	Humanitarian response is effective and timely.
CHS 3: Communities and people affected by crisis are not negatively affected and are more prepared, resilient, and less at-risk as a result of humanitarian action.	Humanitarian response strengthens local capacities and avoids negative effects.
CHS 4: Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.	Humanitarian response is based on communication, participation, and feedback.
CHS 5: Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.	Complaints are welcomed and addressed.
CHS 6: Communities and people affected by crisis receive coordinated, complementary assistance.	Humanitarian response is coordinated and complementary.
CHS 7: Communities and people affected by crisis can expect delivery of improved assistance as organizations learn from experience and reflection.	Humanitarian actors continuously learn and improve.
CHS 8: Communities and people affected by crisis receive the assistance they require from competent and well-managed staff and volunteers.	Staff are supported to do their job effectively, and are treated fairly and equitably.
CHS 9: Communities and people affected by crisis can expect that the organizations assisting them are managing resources effectively, efficiently, and ethically.	Resources are managed and used responsibly for their intended purpose.

2.2. Accountability to Affected Populations

In 2011, the IASC principals agreed to five Commitments on Accountability to Affected Populations (CAAP) as part of a framework for engagement with communities. The revised version was developed and endorsed by the IASC Principals on the 20th of November 2017 to reflect essential developments such as the Core Humanitarian Standard, the work done by the IASC on Inter-Agency community-based complaints mechanisms including PSEA and the importance of meaningful collaboration with local stakeholders.

RRT works to uphold the principles of the AAP and encourages employees to continually apply the framework in their duties. All the AAP Commitments are implemented in RRT’s programmatic work and administrative functions:

1. Leadership
2. Participation and Partnership
3. Information, Feedback and Action
4. Results

The AAP, also known as the people-centered approach, places the impacted individuals and their needs at the center of the program design. AAP considers the needs and capacities of different groups in the community, such as women, men, girls, boys, the elderly, and so on, rather than viewing the community as a homogeneous entity.

AAP is divided into three dimensions of accountability:

Taking into account; allowing individuals to have a say in decisions that need to be made at various stages of the programs, taking into account the diversity of the community and weighing and considering the thoughts and opinions of the most vulnerable. Vulnerability analysis is being carried out to incorporate universal elements like sex and age, as well as concerns like ethnicity, religion, handicap, and race, all of which have a significant impact on a person's visibility, opportunities, and power.

Giving account; refers to actors providing information to the community through-out the program and outlining what plans and commitments are and how and why decisions were made and what the process was.

Being held to account; permits people who have been affected by an agency's response to assess the quality of the response and the relevance of activities, to review how these activities have been implemented, and to provide feedback on how effectively the activities have addressed their needs.

3. RRT’s Guide to AAP Commitments

The following guide documents the primary channels through which the AAP is applied to RRT’s work.

IASC AAP Commitment	Relevant RRT Policies, Documents, and/or Staff Positions	Key Actions and Activities
<p><u>Leadership:</u> Demonstrate their commitment to Accountability to Affected Populations (AAP) and Protection from Sexual Exploitation and Abuse (PSEA) by enforcing, institutionalizing and integrating AAP approaches in the Humanitarian Program Cycle and strategic planning processes, at country level and by establishing appropriate management systems to solicit,</p>	<p><u>Relevant documents:</u></p> <ul style="list-style-type: none"> • RRT’s Foundation Charter/Statue • RRT Work Contract including Workplace Regulation, Code of Conduct and Confidentiality Agreement, • RRT’s Feedback and Complaints Policy, 	<p>Diversity is included as a key part of relevant RRT policy documents.</p> <p>Formal mechanisms, such as staff performance evaluations are used to demonstrate accountability to the mission.</p> <p>A code of conduct is upheld for all employees, and at all subrecipient organizations.</p>

<p>hear and act upon the voices and priorities of affected people in a coordinated manner, including for SEA, before, during and after an emergency.</p>	<ul style="list-style-type: none"> • RRT’s AAP Framework, • RRT’s Child Safeguarding Policy, • RRT’s PSEA Framework, • RRT’s Conflict of Interest and Anti-Corruption Policy, • RRT Personal Data Protection and Processing Policy. • RRT Internal Complaints Policy. <p><u>Relevant staff positions:</u></p> <ul style="list-style-type: none"> • Senior Management Team • Monitoring and Evaluation Staff Members • (Senior) Program Managers • Ethics and Compliance Manager 	<p>AAP commitments guide is available for all team members.</p> <p>AAP commitments are reflected in programmatic workflows and relevant organizational documents.</p> <p>RRT’s PSEA commitments are well-defined within both RRT Code of Conduct and PSEA Framework.</p> <p>The orientation program for new recruits includes AAP commitments, ethics and professional values, and information on PSEA; and refresher training sessions are conducted for all personnel at 6-month intervals.</p>
<p><u>Participation and Partnership:</u> Adopt agency mechanisms that feed into and support collective/coordinated people-centered approaches that enable women, girls, boys, men, including the most marginalized and at-risk people among affected communities, to participate in and play an active role in decisions that will impact their lives, well-being, dignity and protection. Adopt and sustain equitable partnerships with local actors to build upon their long-term relationships and trust with communities.</p>	<p><u>Relevant documents:</u></p> <ul style="list-style-type: none"> • RRT’s Foundation Charter/Statue • RRT Work Contract including Workplace Regulation, Code of Conduct and Confidentiality Agreement • RRT’s Feedback and Complaints Policy • RRT’s AAP Framework, • RRT’s Child Safeguarding Policy, • RRT’s PSEA Framework, • RRT’s Conflict of Interest and Anti-Corruption Policy. • RRT’s evaluation forms / interview templates <p><u>Relevant staff positions:</u></p>	<p>Due to the legal and technical nature of RRT’s direct legal assistance, participation of beneficiaries remains limited regarding content, scope, and operation of services. Yet, feedback and additional input from beneficiaries collected regularly as part of monitoring and evaluation which are channeled to decision-making of services, scope, and delivery modalities.</p> <p>Needs of different groups of beneficiaries, especially special needs of marginalized persons and groups are integrated by encouraging them to participate to regular monitoring and evaluation surveys and interviews and group counseling</p>

	<ul style="list-style-type: none"> • Senior Management Team • (Senior) Program Managers • Monitoring and Evaluation Staff Members • Ethics and Compliance Manager 	<p>discussions.</p> <p>Employees sign a code of conduct, which includes a section on cultural competency.</p> <p>The orientation program for new recruits includes information on Code of Conduct and all RRT policies; and refresher training sessions are conducted for all personnel at 6-month intervals.</p> <p>Standard Operating Procedures (SOPs) for duties of all staff and job descriptions are written, reviewed, and revised by the supervisors of relevant program units.</p>
<p><u>Information, Feedback and Action:</u> Adopt agency mechanisms that feed into and support collective and participatory approaches that inform and listen to communities, address feedback and lead to corrective action. Establish and support the implementation of appropriate mechanisms for reporting and handling of SEA-related complaints. Plan, design and manage protection and assistance programs that are responsive to the diversity and expressed views of affected communities.</p>	<p><u>Relevant documents:</u></p> <ul style="list-style-type: none"> • RRT’s Feedback and Complaints Policy, • RRT’s AAP Framework, • RRT’s Child Safeguarding Policy, • RRT’s PSEA Framework, • RRT’s Conflict of Interest and Anti-Corruption Policy. • RRT’s evaluation forms / interview templates • RRT’s online and printed information/reference outputs for beneficiaries <p><u>Relevant staff positions:</u></p> <ul style="list-style-type: none"> • Senior Management Team • Ethics and Compliance Manager • Monitoring and Evaluation Staff Members 	<p>RRT scope and duration of services available, potential outcomes/results as well as services not provided are explained to all prospective beneficiaries at first interaction.</p> <p>Informational materials for refugees are provided in multiple beneficiary languages in multiple formats.</p> <p>RRT engages in a variety of information activities to support refugees. These activities encompass an online information platform dedicated to refugees, posts on social media accounts, and the creation of multilingual information materials, both in digital and hard copy formats, that cover topics such as refugee rights and responsibilities.</p> <p>Complaint procedure exists and can be utilized anonymously. Mechanisms for reporting and</p>

		<p>handling of SEA-related complaints are outlined in FCM Policy and RRT Guideline for the Investigation of Reports of Suspected Misconducts.</p> <p>Complaint procedure is documented and distributed internally.</p> <p>Information on Complaint Procedure is shared in the orientation program of new recruits, and refresher training sessions are held for all staff at 6-month intervals.</p> <p>Beneficiaries and stakeholders are regularly informed about the methods of applying to the feedback and complaint mechanism, the standards of evaluation of complaints and feedbacks via social media, websites and in-office boards.</p> <p>Ethics and Compliance Manager maintains a database to record all feedback and complaints received, as well as the corresponding actions taken. At quarterly intervals, a root cause analysis of the incoming feedback and complaints is conducted. This analysis serves as a learning feedback mechanism and is presented to the Senior Management Team. By analyzing the root causes, RRT aims to identify areas for improvement and implement necessary measures to address the issues raised.</p> <p>At the end of program/project cycles, evaluation with volunteering beneficiaries to collect feedback and complaints about services to be assessed</p>
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		and evaluated internally.
<p><u>Results:</u> Measure AAP and PSEA related results at the agency and collective level, including through standards such as the Core Humanitarian Standard and the Minimum Operating Standards on PSEA; the Best Practice Guide to establish Inter-Agency Community-Based Complaint Mechanisms (CBCM) and its accompanying Standard Operating Procedures.</p>	<p><u>Relevant documents:</u></p> <ul style="list-style-type: none"> • RRT’s Code of Conduct and PSEA Policy • RRT’s evaluation forms / interview templates • RRT’s Feedback and Complaints Policy <p><u>Relevant staff positions:</u></p> <ul style="list-style-type: none"> • Senior Management Team • Monitoring and Evaluation Staff Members • Ethics and Compliance Manager 	<p>AAP is reflected in organizational indicators, particularly through end of year, comprehensive impact and/or outcome evaluations.</p> <p>Monitoring and Evaluation Officer and other staff review surveys conducted and their results/analysis along with monthly financial statements to review program needs and potential changes in context.</p> <p>Feedback and complaints are analyzed regularly, and the results of feedback and complaint analysis are evaluated in the program design.</p> <p>IASC Minimum AAP Standards Checklist is used and analyzed regularly in order to check the compliance of RRT’s activities with the standards and implement necessary audit mechanisms.</p>

4. RRT Commitments Related to the AAP Framework

The following chart summarizes internal RRT values and principles to which the organization is committed. These statements are presented with the corresponding IASC AAP commitments that they fulfill.

IASC AAP Commitment	Related RRT Commitments
<p><u>Leadership:</u> Demonstrate their commitment to Accountability to Affected Populations (AAP) and Protection from Sexual Exploitation and Abuse (PSEA) by enforcing, institutionalizing and integrating AAP approaches in the Humanitarian Program Cycle and strategic planning processes, at country level and by establishing appropriate</p>	<p>As a refugee rights advocate, RRT is committed to empowering of refugees, asylum seekers and vulnerable migrants of all nationalities and diverse profiles by providing them legal information and assistance. Additionally, RRT as a capacity building actor, delivers seminars to legal practitioners to increase the quality and amount of available legal</p>

management systems to solicit, hear and act upon the voices and priorities of affected people in a coordinated manner, including for SEA, before, during and after an emergency.

assistance providers. Finally, RRT advocates for refugee rights at local, national and international levels via advocacy tools including workshops, seminars, and reference materials produced among others.

RRT works to uphold the principles of the AAP and encourages employees to continually apply the framework in their duties. All of the AAP Commitments are implemented in RRT's programmatic work, administrative functions and internal policies.

Enforcing AAP Approaches: RRT actively enforces and promotes AAP approaches throughout the program cycle and strategic planning processes. This includes integrating AAP principles into decision-making, resource allocation, and program implementation to ensure the voices and needs of affected populations are prioritized and incorporated.

Institutionalizing AAP: RRT works towards institutionalizing AAP within its policies, procedures, and organizational culture. This involves embedding AAP as a core component of the organization's values, code of conduct, and staff training, ensuring that all staff and partners are aware of and committed to upholding AAP principles.

Establishing Management Systems: RRT established appropriate management systems to facilitate the solicitation, listening, and action upon the voices and priorities of affected people. This includes establishing feedback mechanisms, complaint channels, and community engagement structures such as group counseling activities that enable affected populations to provide feedback, voice concerns, and seek assistance in a safe and confidential manner.

Coordinated Response to SEA: RRT adopted a coordinated and comprehensive approach to address and prevent sexual exploitation and abuse (SEA). This involves establishing robust reporting mechanisms, conducting investigations, and ensuring appropriate support and protection mechanisms are in place for survivors. RRT also prioritizes staff training on preventing and

	<p>responding to SEA, creating a safe and accountable environment for all.</p>
<p><u>Participation and Partnership:</u> Adopt agency mechanisms that feed into and support collective/ coordinated people-centered approaches that enable women, girls, boys, men, including the most marginalized and at-risk people among affected communities, to participate in and play an active role in decisions that will impact their lives, well-being, dignity and protection. Adopt and sustain equitable partnerships with local actors to build upon their long-term relationships and trust with communities.</p>	<p>Displaced populations in need of protection are key stakeholders in the organization’s work. Although RRT’s services are delivered within the framework of domestic legislation constraints and in this sense more technical in nature; feedback of beneficiary and target population is collected through a variety of methods such as FCM, surveys or focus group discussions during and after project implementations especially regarding service delivery modalities and communication; and evaluated carefully at both development and implementation stage of our programs.</p>
<p><u>Information, Feedback and Action:</u> Adopt agency mechanisms that feed into and support collective and participatory approaches that inform and listen to communities, address feedback and lead to corrective action. Establish and support the implementation of appropriate mechanisms for reporting and handling of SEA-related complaints. Plan, design and manage protection and assistance programs that are responsive to the diversity and expressed views of affected communities.</p>	<p>Displaced populations in need of protection know their rights, are encouraged to share feedback as per service delivery modalities and are informed of the nature of services they are eligible to receive.</p> <p>Displaced populations in need of protection who receive services are aware that the organization maintains a publicly available complaint procedure in order to solicit feedback, also allowing for anonymous submissions.</p> <p>Relevant staff members have access to clear internal documentation on the process for receiving, handling, responding to, and resolving a complaint.</p> <p>Feedback and complaints are analyzed regularly, and the results of feedback and complaint analysis are evaluated in the program design.</p> <p>Responsive Protection and Assistance Programs: RRT plans, design, and manage protection and assistance programs that are responsive to the diversity and expressed views of affected communities. This involves conducting thorough needs assessments, consulting with communities, and tailoring programs to meet their specific needs and priorities.</p> <p>Capacity Building: RRT recognizes the importance of capacity building initiatives to empower affected communities and strengthen their ability to actively participate in decision-making</p>

	<p>processes and access their rights. To achieve this, RRT focuses on providing training, resources, and opportunities to legal practitioners, aiming to enhance the quality and quantity of available legal assistance providers. By equipping legal practitioners with the necessary knowledge and skills, RRT aims to improve the provision of legal assistance and support to refugees, enabling them to navigate legal processes and protect their rights effectively.</p>
<p><u>Results:</u> Measure AAP and PSEA related results at the agency and collective level, including through standards such as the Core Humanitarian Standard and the Minimum Operating Standards on PSEA; the Best Practice Guide to establish Inter-Agency Community-Based Complaint Mechanisms (CBCM) and its accompanying Standard Operating Procedures.</p>	<p>RRT maintains monitoring and evaluation staff members to ensure that the needs of refugee and displaced populations in need of protection are being addressed through the organization's program. This staff coordinates a program-wide effort to gather and incorporate feedback from beneficiaries.</p> <p>IASC Minimum AAP Standards Checklist is used and analyzed regularly to check the compliance of RRT's activities with the standards and implement necessary audit mechanisms.</p>

5. Review

RRT management will review RRT's AAP Framework implementation annually with respect to legal and regulatory developments and to ensure compliance and best practice. This policy document is reviewed each June of the year by the Ethics and Compliance Manager approved by RRT Management. Staff is notified of the changes via e-mail. During the meetings held regularly by the Ethics and Compliance Manager with the staff, information about the policy document is provided and questions about the content are answered. RRT reserves the right to make changes to the document when it deems necessary, without waiting for the annual review.

With respect to AAP framework, the latest IASC Minimum Standards Checklist is reviewed annually by the Ethics and Compliance Manager, and action points are created for areas that need improvement. The results are shared with the executive team in the quarter internal reporting of Ethics and Compliance Manager.

In addition, RRT regularly follows the UNHCR Turkey AAP task force meetings, follows international debates on the issue, monitors developments thanks to the experience sharing of other organizations in Turkey, and builds on the guiding policy documents of Task Force for the review of its own policies and procedures.

6. Reference Documents

This policy document is fully in compliant with relevant national legislation as well as key international legislation. RRT was inspired by and benefitted from following key guiding documents, statements, and

standards, and make the utmost effort to fully comply with principles set forth. As of the date of review of this policy document, this policy is fully compliant with the following:

- Inter-Agency Standing Committee , Revised Commitments on Accountability to Affected Population and Protection From Sexual Exploitation and Abuse, November 2017, available at: <https://interagencystandingcommittee.org/system/files/2020-11/IASC%20Revised%20AAP%20Commitments%20endorsed%20November%202017.pdf>
- Statement by Principals of the Inter-Agency Standing Committee (IASC) on Accountability to Affected People in Humanitarian Action, available at: <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>
- AAP Operational Guidance, A toolkit by UNHCR, September 2020, available at: https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP_Operational_Guidance.pdf
- UNHCR Policy on Age, Gender and Diversity, available at: <https://www.unhcr.org/5aa13c0c7.pdf>
- Inter- Agency Standing Committee Policy on Gender Equality and The Empowerment of Women and Girls in Humanitarian Action, November 2017, <https://aap-inclusion-psea.alnap.org/help-library/inter-agency-standing-committee-policy-on-gender-equality-and-the-empowerment-of-women>
- Inter- Agency Standing Committee Policy, Checklist to Protect from Sexual Exploitation and Abuse during COVID-19, available at: <https://interagencystandingcommittee.org/system/files/2020-06/IASC%20Checklist%20PSEA%20during%20COVID-19.pdf>
- IASC Guidelines, Inclusion of Persons with Disabilities in Humanitarian Action, 2019, available at: <https://interagencystandingcommittee.org/iasc-guidelines-on-inclusion-of-persons-with-disabilities-in-humanitarian-action-2019>
- United Nations, Convention on the Rights of Persons with Disabilities and Optional Protocol, <https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>
- United Nations, Disability Inclusion Strategy, https://www.un.org/en/content/disabilitystrategy/assets/documentation/UN_Disability_Inclusion_Strategy_english.pdf