

COMMUNITY ACCOUNTABILITY REPORTING

MECHANISM (CARM) POLICY

Effective Date	January 1, 2021	Version 1.0	Version Date	June 3, 2020
Responsible Team	Program Performance and Quality Unit			
Supersedes	None			
Policy Type	Tier 2 Policy	Policy Number	POL-1002	POLICY

1. Purpose

CARM was developed as part of Mercy Corps' global commitment to accountability to affected populations and the prevention of all forms of exploitation and abuse. 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.

This policy implements the CARM requirements described in Mercy Corps' Sexual Exploitation and Abuse of Beneficiaries and Community Members Policy.

The guidance, tools, and templates to implement CARM according to this policy can be found in the [CARM Toolkit](#).

2. Scope and Application

2.1. Policy Application

This policy applies to Mercy Corps Global, Mercy Corps Europe and Mercy Corps Netherlands, their subsidiaries and affiliate organizations, and country representation (collectively, "Mercy Corps"); and Partners, including sub-recipients, partner organizations, contractors, consultants and any other organization or individual that acts on Mercy Corps' behalf (collectively, "Partners").

This policy applies to all programs and/or projects that Mercy Corps or [Partners](#) implement to support [program stakeholders](#), regardless of scope, scale, size, time, budget or funding source. Mercy Corps will hold itself accountable to affected populations in any and all programs.

Organizational structures and entities that support program implementation teams will maintain the necessary processes, people and systems to implement this policy.

2.2. Policy Exceptions and Modifications

Within programs or projects there may be circumstances where a modification(s) to a specific CARM minimum standard or CARM roles and responsibilities is appropriate. The default should always be that the standards in this policy will be followed, and modifications will be approved only when clearly justified. Situations that may qualify for modifications include:

- > Mercy Corps visibility/branding poses a threat to team member or community member safety
- > New country emergency response
- > Humanitarian access teams (HATs) or Crisis Analytics teams
- > Research or assessments in new countries

The potential situations outlined above are not an exhaustive list. Any country, entity, team, or program seeking an exception to a specific minimum standard or other element in this policy will be addressed on a case-by-case basis.

To understand when a modification to this policy may be appropriate, refer to the CARM policy modification [frequently asked questions](#) (FAQs) and the [modification decision tree](#). If, based on the FAQs and decision tree, you believe an exception is appropriate, take the following steps:

1. Complete the 1-page [modification memo template](#)
2. Submit the modification memo to the Country Director for signature
3. Submit the signed modification memo to carm@mercycorps.org for review

The submitted modification memo will be informed by the country's risk assessment that evaluates Do No Harm principles within CARM processes. The global Community Accountability team will review each modification memo on a case-by-case basis and discuss with the submitting team as necessary. The global team will make a recommendation on whether or not an exception should be approved and any appropriate modifications, and submit the recommendation to the Vice President of the PaQ Unit for final approval. The Community Accountability team will communicate the final decision back to the submitting team.

Certain minimum standards detailed in this policy will not be considered for modifications:

- > Any feedback collected needs to be graded according to Mercy Corps' six Grades ([3.6](#))
- > Any Grade 5 and 6 feedback must be directly referred to the Integrity Hotline ([3.8](#))

3. Mercy Corps Global CARM Minimum Standards

Each Country or equivalent is required to maintain a CARM for their activities that meets the minimum standards stated below. CARM needs to be designed in a context-appropriate way based on the operating environment, program complexity, and staffing structure. The CARM minimum standards are designed to ensure that contextualized CARM processes will align with the CARM feedback workflow (right).



Mercy Corps CARM Minimum Standards

The nine Mercy Corps CARM Minimum standards are as follows:

- 1. CARM focal points are designated at the country and program levels**
- 2. CARM is budgeted for in all programs**
- 3. CARM standard operating procedures are completed and approved**
- 4. Every active program has three feedback channels and communities are sensitized to their purpose and availability**
- 5. All feedback is documented and managed in a CARM database**
- 6. Feedback is classified according to six standard Grades and grading is verified**
- 7. Appropriate action is taken for all feedback based on Grade**
- 8. All Grade 5 and 6 feedback is reported directly to the Integrity Hotline and the informant's identity is protected**
- 9. The feedback loop is closed for all non-anonymous feedback**

Partners and CARM minimum standards

1. CARM focal points are designated at the country and program levels

1.1. COUNTRY-LEVEL (OR ENTITY-LEVEL) CARM FOCAL POINTS

Each Mercy Corps Country or equivalent will designate a country CARM focal point, who has overall responsibility for the management and quality of CARM for the Country or equivalent and who is responsible for leading the design and implementation of its CARM. These responsibilities will be reflected in the team member's position description. The CARM country focal point is encouraged to sit on the Country Senior Management Team to help ensure the continued prioritization of CARM.

1.2. PROGRAM-LEVEL CARM FOCAL POINTS

Each program will designate a program CARM focal point, who will be responsible for reporting any identified gaps in the program's CARM to the country CARM focal point and the program manager. See section 7.1 for additional details.

2. CARM is budgeted for in all programs

Every program budget will have budget lines allocated for community accountability. Adequate funding levels will be determined based on the context-specific CARM, which will factor in staffing levels, and geographic reach, program type, and complexity of the operating environment, all of which affect the volume of feedback received.

3. CARM standard operating procedures are completed and approved

The CARM standard operating procedure (SOP) template will be completed by any Mercy Corps Country or equivalent¹ that works directly with program stakeholders. This SOP will apply to all current and future applicable programs managed by the Country or equivalent. The Mercy Corps CARM SOP standard template must be used for this SOP.

¹ This minimum standard is also required by the PM@MC manual.

The initial Country CARM SOP for each Country or equivalent will be submitted to carm@mercycorps.org for technical review. The SOP will be resubmitted to the global community accountability team if it undergoes a significant revision. After technical review, the Country Director or equivalent approves the SOP.

4. Every active program has three feedback channels and community members are sensitized on their purpose and availability

4.1. THREE FEEDBACK CHANNELS

Every program is required to have a minimum of three feedback channels to collect unsolicited feedback within 90 days of program start-up (90 days from the first day of the grant agreement):

- 1. Face-to-face feedback**
- 2. A channel that allows feedback to be submitted anonymously**
- 3. An additional context-appropriate channel**

Note: Most Countries or equivalent will have several feedback channels that can function at the country-level, such as a hotline, email address, facebook account, etc. These country-level feedback channels can be selected as the second and third feedback channels.

When operating programs remotely or with reduced access and it is not possible to collect face-to-face feedback, two feedback channels are allowed.

In determining which feedback channels are context-appropriate for a specific program, communities must be engaged to ensure that channels are chosen in an inclusive manner, and that they are accessible to people of different age, sex, ability, and people from minority or marginalized groups.

Feedback channels that collect only solicited feedback are not considered part of the required three channels. Such channels include:

- > Focus group discussions
- > Baseline surveys
- > Endline surveys
- > Post-distribution monitoring
- > Meetings that are not open to the public

Note: While these examples are not official CARM channels, if feedback is collected through one of these channels, it needs to be logged in the CARM database, graded, and processed, the way all unsolicited feedback is. This process will be outlined in the CARM SOP.

4.2. INCLUSIVE SENSITIZATION IS CONDUCTED TO INFORM COMMUNITY MEMBERS OF THE FEEDBACK CHANNELS AVAILABLE TO THEM AND THEIR PURPOSE

Community members must be informed of the availability and purpose of feedback channels in an appropriate and inclusive way, which can be achieved through community sensitization.

Community sensitization should relay key messages about the availability of individual feedback channels and how the CARM works as a whole.

In order to ensure that community sensitization is inclusive, teams will work to identify who the minority, majority, and marginalized groups are, and where these individuals are located. It's also important to learn where and how each of these groups receive new information and communication.

5. All feedback is documented and managed in a CARM database

5.1. CARM DATABASES

All CARM feedback, regardless of whether it is received via an official CARM feedback channel or if it is received via a different channel, must be documented in a CARM database. Teams can adapt the available [CARM database template](#) as needed. 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. The required CARM data protection protocols outlined in the CARM SOP will be followed. View the [CARM data storage and protection guidance](#) for additional information on CARM databases and secure use.

5.2. PERSONAL IDENTIFIABLE INFORMATION (PII) OF INFORMANTS

For Grade 5 and 6 feedback, the PII (including age and sex) will be stored with the HQ Ethics team and not in the Country's CARM database. The team member managing the CARM database will confirm that the HQ Ethics team has the information they need before deleting any PII. See standard 3.6 below for additional details on feedback Grades.

6. Feedback is classified according to six standard Grades and grading is verified

6.1. STANDARD FEEDBACK GRADES

All CARM feedback received must be classified according to six grades based on severity:

GRADE 1	Positive feedback, suggestions or requests for information
GRADE 2	Requests for assistance
GRADE 3	Minor dissatisfaction with program activities that has no major safety risks
GRADE 4	Major dissatisfaction with program activities or the behavior of Mercy Corps Team Members or Partners that has a potential impact on safety
GRADE 5	Fraud or corruption by Mercy Corps team members or partners
GRADE 6	Sexual exploitation and abuse, child abuse, sexual misconduct, human trafficking by Mercy Corps team members or partners

For additional details on feedback Grades and examples, see [Mercy Corps global standards for classifying feedback](#). 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. These team members will not be members of the program team due to the potential for conflict of interest.

6.2. ASSIGNED FEEDBACK GRADES ARE VERIFIED

The country CARM focal point will conduct a verification of all assigned feedback Grades in the CARM database(s) at a minimum of every two months to confirm that Grades have been accurately determined. Where a high volume of feedback is received, a spot check verification can be conducted. The frequency of verification will be outlined in the CARM SOP.

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. See the [taking appropriate action guidance](#) for additional information. 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

All Grade 5 and 6 feedback that comes in through a CARM channel must be referred directly to the HQ Ethics team by the team member who grades the feedback. Referral will be directly to the Integrity Hotline:

- > integrityhotline@mercycorps.org
- > mercycorps.org/integrityhotline

If there is any uncertainty over whether or not a Grade 4 should instead receive a higher grade, elevate to a Grade 5 or 6 and refer to the Integrity Hotline.

The Team Member responsible for grading the feedback and identifies a piece of feedback as Grade 5 or 6 is also responsible for the referral to the Integrity Hotline.

The Country Director, or other most senior member of that organizational entity, and the country Safeguarding Focal Point (Grade 6 only) can be copied on the initial communication to the HQ Ethics team, **if** the feedback does not name or in any way implicate them in the incident. If there is any question around the potential involvement of the Country Director or Safeguarding Focal Point, the individual implicated will not be informed until guidance is provided by the Ethics team. Confidentiality of the informant's identity and the details of the case will be protected.

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. If feedback is submitted anonymously, it may be appropriate to report on programmatic changes that resulted from the feedback to the larger community. This minimum standard applies to all feedback Grades, and the HQ Ethics team will provide guidance on how to best close the feedback loop for Grade 5 and 6 feedback. View the [closing the feedback loop guidance](#) for more information.

4. Partners and CARM Minimum Standards

4.1. Subrecipients and equivalent arrangements

Subrecipients², 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 to, through a subaward.

For Subrecipients with existing community accountability feedback mechanisms, their CARM must be substantially equivalent to that of Mercy Corps'.

For a Subrecipient's mechanism to be considered substantially equivalent it must align with the CARM workflow and Mercy Corps' CARM minimum standards in the following way:

1. The Subrecipient will designate a team member to serve as the focal point for community accountability communication with Mercy Corps
2. The feedback mechanism process must be documented. Use of Mercy Corps' SOP template is not required. The country or program CARM lead will review the documentation provided by the Subrecipient.
3. Three feedback channels will exist to collect feedback
4. All feedback will be documented in a database
5. All feedback will be graded based on severity. Use of Mercy Corps' six standard feedback grades is not required.
6. Appropriate action will be taken based on the severity of the feedback.
7. Grade 5 and 6 feedback (or the equivalent if the Subrecipient does not use Mercy Corps grades) will be reported to Mercy Corps through the Integrity Hotline in accordance with the terms of the subaward agreement (which may include additional reporting requirements).
8. The feedback loop will be closed for all non-anonymous feedback

Mercy Corps will designate a team member to assess the Subrecipient's feedback mechanism. The designated team member may vary between program and Subrecipient.

For Subrecipients **that do not have existing CARM that is substantially equivalent to Mercy Corps' CARM**, Mercy Corps is responsible for ensuring the Subrecipient has a community accountability mechanism that aligns with the minimum standards outlined in this policy. In order to align with the minimum standards of this policy, Partners can either:

- > Develop their own independent, substantially equivalent community accountability feedback mechanism; or
- > Adopt Mercy Corps' CARM approach as their own independent mechanism; or
- > Use Mercy Corps' CARM by advertising Mercy Corps feedback channels in communities, rather than establish their own independent channels and mechanism for processing feedback.

If the feedback mechanism is not substantially equivalent to Mercy Corps' CARM:

² "Subrecipient" has the meaning defined in Section 1 of Mercy Corps' Subaward Financial Management Manual.

If a Subrecipient does not have a substantially equivalent feedback mechanism at the time pre-award assessment of the Subrecipient is conducted, Mercy Corps will include special language in the subaward indicating that the Subrecipient has an obligation to either adopt Mercy Corps' CARM or develop their own substantially equivalent feedback mechanism, and the timeframe within which this will be accomplished. The subaward language will also reflect Mercy Corps' commitment to follow up with the Subrecipient on their progress, provide capacity building resources as necessary, and which Mercy Corps team member will be responsible.

4.2. Partners other than Subrecipients (including consultants and enumerators)

Mercy Corps often works with Partners that are not subrecipients. See Section 2.1 for a description of third parties considered to be "Partners" for the purposes of this policy. These other types of Partners may include contractors, consultants, enumerators, or other outside experts that receive a contract from Mercy Corps. These other types of Partners are referred to in this section as just "Partners."

These Partners cannot reasonably be expected to build their own feedback mechanism for communities. If a Partner will have direct interaction with program participants or local communities, the Partner must use Mercy Corps' CARM by advertising Mercy Corps feedback channels in communities and any feedback must go directly to Mercy Corps. This feedback channel advertisement can be achieved through various types of visibility.

See the [CARM with Partners Guidance](#) for additional details on community accountability through Partners.

5. Related Policies, Procedures and Guidance

5.1. Mercy Corps Code of Conduct

5.2. Code of conduct policies and related guidance

[Anti-Corruption Policy](#)

[Anti-Trafficking Policy](#)

[Anti-Bribery Policy](#)

[Child Safeguarding Policy](#)

[Conflict of Interest Policy](#)

[Ethics Complaint Whistleblower Policy](#)

[Sexual Exploitation and Abuse of Beneficiaries and Community Members Policy](#)

[Sexual Misconduct in the Workplace Policy](#)

[Guide to understanding Mercy Corps' Sexual Exploitation and Abuse Policy](#)

[Quick Guide on Reporting Sexual Misconduct Allegations](#)

5.3. Additional policies

[Program Management Manual](#)

[Program Record Retention and Archiving Policy](#)

[Responsible Data Policy](#)

6. Definitions and Acronyms

6.1. CARM: Community Accountability Reporting Mechanism

6.2. Local communities: Any village, town, sub-district, etc. where Mercy Corps Team Members or Partners conduct any program-related activities

- 6.3.** **MEL:** monitoring, evaluation, and learning
- 6.4.** **PaQ:** Program Performance and Quality
- 6.5.** **Partners:** sub-recipients, partner organizations, contractors, consultants and any other organization or individual that acts on Mercy Corps' behalf (collectively, "Partners")
- 6.6.** **Program:** A program consists of multiple projects or interventions, which are funded by one or more awards and/or core funds, that have a common purpose and are managed together by a single manager to bring about incremental benefits.
- 6.7.** **Program participants:** Individuals who participate in any Mercy Corps program activities, including community members, local authorities, members of local government, etc. Team members of local partners participating in capacity building activities provided by Mercy Corps are also included in this definition.
- 6.8.** **Program stakeholders:** program participants, program bystanders, local partners, international partners, sub-recipients, public and/or government sector partners, private sector partners, and any other individual or entity present in a Mercy Corps program intervention area or acting on Mercy Corps' behalf.
- 6.9.** **SOP:** standard operating procedure
- 6.10.** For additional definitions related to CARM, see the [CARM Key Terms](#)

7. Roles and Accountability

7.1. Mercy Corps country or equivalent

COUNTRY DIRECTORS

The Country Director (CD), or the other most senior member of the Country or equivalent, is ultimately accountable for the Country or equivalent's compliance with this policy. The CD is accountable for ensuring that CARM is adequately staffed and that CARM operation costs are sufficiently budgeted for in proposals. The CD is also responsible for:

- > Appointing a country CARM focal point;
- > Determining, in consultation with the country CARM focal point, which team member(s) will have the authority to grade feedback;
- > Determining whether or not the country will form a [Case Management Committee](#) to address Grade 4 feedback; if a Case Management Committee will not be formed, the CD will determine who will oversee Grade 4 cases;
- > Maintaining CARM as a regular agenda item at Senior Management Team meetings;
- > Communicating incidents externally when required by donors or other applicable legal obligations when appropriate and with the guidance of the HQ Ethics team.

COUNTRY (ENTITY) CARM FOCAL POINT

The designated CARM focal point for each country/entity serves as the primary CARM contact and person responsible for drafting the CARM SOP and implementing CARM in their country in a collaborative manner. The CARM focal point is responsible for:

- > Managing a CARM design process that fulfils all global CARM minimum standards outlined in this policy;
- > Ensuring that feedback is documented in a country CARM database and that the database complies with the CARM data protection protocols detailed in the CARM SOP;

- > Conducting a quality assurance check of the CARM database(s) to verify that feedback has been graded appropriately, that appropriate action was taken for the feedback, and that the person who provided the feedback was informed of the resolution;
- > Ensuring all Grade 5 and 6 feedback is reported to the HQ Ethics team.
- > Ensuring the CARM SOP is reviewed and updated as needed
- > Ensuring regular reporting is conducted on CARM data for all programs and at the country level

PROGRAM CARM FOCAL POINT

The designated CARM focal point for each program is responsible for:

- > Ensuring that the program is accurately reflected in the CARM SOP;
- > Ensuring their program has three context-appropriate feedback channels;
- > Reporting any identified gaps in the program's CARM to the country CARM focal point and the program manager;
- > When working with Partners, ensuring a Mercy Corps team member is assigned to assess the Partner's feedback mechanism and ensuring a team member is designated to serve as the contact person with the Partner.

PROGRAM MANAGERS

Program managers are responsible for:

- > **Ensuring CARM is operationalized within their program;**
- > Designating a CARM focal point for their program. The program manager may also be the program CARM focal point;
- > Developing a CARM sensitization plan for feedback channels, in coordination with CARM and monitoring, evaluation, and learning (MEL) teams, to ensure the harmonization of messaging;
- > Ensuring CARM sensitization activities are included in the program activity plan;
- > Ensuring that program stakeholders are proactively informed of the program CARM feedback channels;
- > Ensuring that appropriate action is taken for all programmatic feedback Grades 1-4 and that it is appropriately incorporated into program activities and overall implementation strategy;
- > When working with Partners, program managers are ultimately responsible for ensuring Partners are compliant with the requirements in section 4 of this policy.

REGIONAL DIRECTORS

As line management of Country Directors, Regional Directors hold the Country Director accountable to implement the global CARM minimum standards and that adequate goals are set for budgeting, training and staffing. Regional leadership will:

- > Help prioritize the focus of technical support provided by the global CARM team to high risk and high priority areas;
- > Coordinate with the HQ PaQ team to ensure adequate technical support is provided to country teams.

7.2. Headquarters

SENIOR VICE PRESIDENT (SVP) - PROGRAMS

The Senior Vice President of Programs is line management of regional leadership and therefore is responsible for executive action when needed to ensure a Country or equivalent is in compliance with the global CARM minimum standards. The SVP is also a core member of the Enterprise Risk Committee and as such, will be informed of all CARM-related incidents needing executive-level input and guidance. The SVP is also responsible for reporting to the board on CARM, and representing CARM to the Enterprise Risk Management Committee.

VICE PRESIDENT (VP) OF PERFORMANCE AND QUALITY (PaQ)

The Vice President of Performance and Quality is responsible for representing CARM to the SVP. The VP is also responsible for reviewing all CARM policy modification memos and considering the recommendation of the PaQ team's Community Accountability team before approving or rejecting any policy modification decisions.

PERFORMANCE AND QUALITY UNIT

This policy is owned by the PaQ Unit. The PaQ Unit is responsible for providing any necessary technical support needed in order to comply with the minimum standards outlined in this policy. The PaQ Unit is also responsible for data analysis and reporting around CARM effectiveness.

The community accountability team in the PaQ Unit is responsible for any future revisions to the global CARM policy. The line manager of the Community Accountability team and the head of the PaQ Unit are responsible for supporting policy revisions as necessary.

SAFEGUARDING AND ETHICS TEAMS

The safeguarding and ethics teams will coordinate closely with country teams and are responsible for ensuring that all Grade 5 and 6 feedback that is referred to them receives the necessary resources, guidance, and expertise to be thoroughly investigated.

ENTERPRISE RISK MANAGEMENT COMMITTEE (ERMC)

The Enterprise Risk Management Committee is responsible for reviewing global CARM metrics and major incidents. The ERMC is also responsible for ensuring that any necessary investigations that result from CARM feedback have adequate investigation resources.

7.3. Individual responsibility

All Mercy Corps Team Members, regardless of their position, are responsible for conducting themselves with accountability to affected populations, and promoting the participation of and transparency to affected populations. All Team Members are responsible for:

- > Reading and understanding the CARM policy;
- > Ensuring that they are onboarded to the CARM process;
- > Sensitizing community members on the feedback channels available to them, understanding how to address all feedback received face-to-face (country Team Members engaging with community members);
- > Submitting face-to-face feedback through a country CARM feedback channel, to a member of a country CARM team, or to the Integrity Hotline;

- Reporting any feedback that presents the ethical or criminal concerns outlined as Grade 5 or 6 feedback directly to the Integrity Hotline. Team members who are not comfortable communicating directly with the Integrity Hotline may also submit Grade 5 and 6 feedback into one of the available CARM channels;
- Collaborating with the HQ Ethics team to assist with in-country investigations as is necessary and appropriate.

8. Policy Governance

Responsible Team	Program Performance and Quality (PaQ) Unit
Policy Owner	Vice President of Program Performance and Quality, PaQ Unit
Policy Approver	Senior Vice President of Programs
Last Reviewed	May 2020
Next Review Date	May 2021