

Implementing the IASC Protection Policy: What does it mean for NGOs?



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Background

- The [Inter-Agency Standing Committee \(IASC\) Principals' Statement on the Centrality of Protection](#) (2013) affirmed that **all humanitarian actors have a responsibility to place protection at the center of humanitarian action**. With the endorsement of the [IASC Protection Policy](#) (2016), the IASC went further in defining the centrality of protection within humanitarian operations, and the process for its implementation at country-level.
- The [IASC Protection Policy](#) (hereafter 'the Policy') outlines the overarching framework for how humanitarian actors can fulfil their responsibility to place protection at the center of all aspects of humanitarian action, spelling out **core principles, approaches, roles, and responsibilities within and beyond the humanitarian system**.
- The Policy sets out the IASC commitment to **prioritizing protection and contributing to collective protection outcomes**, including through the requirement of Humanitarian Country Teams (HCTs) to develop protection strategies to address the most critical and urgent risks and violations. Emphasis is also placed on reinforcing the complementary roles, mandates and expertise of all relevant actors.
- **NGOs have an important role to play** in the implementation of the Policy, by incorporating key elements into their organizational approaches to protection, and contributing to interagency leadership and coordination on protection at country-level.

Underpinning concepts within the Policy

Protection is everyone's responsibility

The Policy emphasizes that protection must be understood as a shared, system-wide responsibility that is core to humanitarian action. Everyone is responsible for preventing or mitigating risks and restoring safety and dignity to people's lives, not just protection specialists.

Protection is about outcomes, not only outputs

Humanitarian actors must respond to the priorities of affected people by designing and implementing activities that address their concerns. This means identifying and reducing risks by changing the behavior, attitudes, policies, knowledge or practices of relevant stakeholders.

Vulnerable groups are identified and responses designed based on analysis, not pre-determined

In-depth and integrated analysis needs to take into account the specific vulnerabilities that underlie the risks faced by all affected people, thereby avoiding an exclusive focus on pre-defined categories of people. This analysis must also provide the evidence-base for programming, advocacy and dialogue for the purpose of influencing and changing behaviors and policies in support of a more favorable protection environment.

Whole-of-system approach to addressing severe and widespread protection risks

The Policy highlights the necessary elements for a robust, strategic, and multi-disciplinary response, with protection outcomes at its core. Responsibilities of different actors are defined, including the lead roles of the Humanitarian Coordinator (HC) and the HCT in addressing serious protection risks.

Mobilizing multi-disciplinary stakeholders, including non-humanitarian actors

Responsibility for achieving protection outcomes is not restricted to the protection sector, and should be integrated into other programming. Collective protection outcomes may require contributions from non-humanitarian actors, while respecting humanitarian principles and the need for complementarity, e.g. peacekeeping, development, conflict resolution, state and diplomatic entities.

NGO role in implementing the IASC Protection Policy

While NGOs are far from the only actors responsible for implementing the Policy, there are a number of proactive steps NGOs can take both within their own organizations and collectively through coordination and collaborative efforts. Section 3.2 (page 5-8) sets out the importance of engaging collectively to achieve meaningful protection outcomes in a number of key areas, which are expanded below. For more information on the key elements necessary to achieve protection outcomes, see the [Results-Based Protection Program](#)¹.

Data and information collection, sharing and management

All collection and sharing of data must be designed with a clear purpose in mind. Data collection should be timely, adhere to data protection standards, and must be collected in a manner that protects the individuals and groups providing information from harm. For more information, see [Protection Information Management](#)² and Chapter 6 of the [Professional Standards for Protection Work](#)³.

Key questions for NGOs to consider:

Are data and information collection and sharing activities purposeful in their design, and conducted in a manner that is **timely enough to support early warning mechanisms and enable rapid and potentially life-saving interventions**?

What proactive steps are taken to ensure **adherence to data protection standards and principles of confidentiality**?

How are NGOs **diversifying their methods and sources of information**, in order to build a comprehensive understanding of the context, including from the perspective of affected people?

In-depth and integrated protection analysis

Analysis must consider specific vulnerabilities that underlie the risks faced by all affected people; identify the leverage, roles and capacities of actors both within and outside the humanitarian system; and outline protection priorities that require humanitarian system-wide responses. This integrated protection analysis must consider all levels of intervention: responsive, remedial, and environment-building.

Key questions for NGOs to consider:

Is protection analysis carried out on a **continuous basis**, in order to dynamically inform decision-making? Or is it regarded as an annual (or less frequent) task or carried out 'because we're supposed to' without actually being used?

Does protection analysis incorporate a **breakdown of risk factors**, including:

- What are the most severe and prevalent threats people are experiencing?
- Who is responsible for those threats, and what are the reasons/motivations for mistreatment of people?
- Who is specifically vulnerable vis-à-vis those specific threats, and why?
- What are the relevant capacities in relation to those specific threats?

Do **collective and collaborative** information collection and protection analysis efforts exist? To what extent are agreed means and methods in place, as well as the necessary levels of trust amongst relevant actors, to facilitate information sharing and collective protection analysis?

To what degree are **affected people involved** in analysis of their threat environment, determining priorities to reduce risks, etc.? Are they agents in solving problems or only recipients and observers of what humanitarians are doing?

Agreement on protection priorities and collective actions

Protection themes must to be discussed regularly by the HCT, drawing on the protection analysis presented by the Protection Cluster and through the HCT's engagement with international and national actors, including NGOs. These HCT discussions should be used to develop a comprehensive, system-wide protection strategy.

¹ Further details on the *Results-Based Protection Program* available at: <https://protection.interaction.org/elements-of-rbp/>

² Further details on *Protection Information Management* available at: <http://pim.guide/>

³ The *Professional Standards for Protection Work (Chapter 6)* are available at: <https://www.icrc.org/eng/assets/files/other/icrc-002-0999.pdf>.

The [Global Protection Cluster \(GPC\) Guidance Note on HCT Protection Strategy](#)⁴ provides useful guidance on what this strategy should include (page 5-7), and factors necessitating HCT-level engagement (page 8).

Key questions for NGOs to consider:

Does the HCT have a **clear sense of its role relating to protection**, as distinct added value to the role of the Protection Cluster? Has the HCT committed to **developing an HCT protection strategy**? How are NGOs using their seats on the HCT to influence these discussions? How often is the protection strategy reviewed for relevance with the changing dynamics of the operating environment?

Is the HCT drawing on a **range of outcome-oriented methods** that are adaptable and enable multiple actors, including affected people, to inform and shape the response?

Is protection programming geared towards **addressing the most severe and prevalent threats**, and the vulnerability of those especially affected, wherever they are? Or does the bulk of the protection response consist of addressing issues arising from quality/standards in assistance activities (e.g. lights in latrines, accessibility of clinics)?

Do protection programs/strategies **identify specific results or outcomes in terms of comprehensively reduced risk**? Or do they mainly consist of a standard “cut and paste” package of activities and outputs?

Are solutions to protection problems described in terms of advocacy only? Or are they described as entailing a **diverse range of efforts working towards a certain outcome**? For example, including community organizing, dialogue with relevant authorities/actors to change policy or behavior, and directing resources and assistance in a way that reduces specific vulnerabilities and enhances specific capacities relevant to certain threats.

Mobilizing multi-disciplinary actors to contribute to protection outcomes

Section 3.3 (page 8-9) of the Policy emphasizes the importance of mobilizing other actors to contribute to collective protection outcomes. NGOs have a key role to play in identifying those actors and developing the relationships necessary to facilitate engagement.

Key questions for NGOs to consider:

Are protection programs/strategies described in terms of implementation by ‘protection actors’ or are they seen as **multi-sectoral and multi-disciplinary**, involving a range of humanitarian and non-humanitarian actors?

Is there understanding of **capacities and comparative advantage of different actors** as it relates to protection outcomes, including non-humanitarian actors?

Is protection seen as the remit and responsibility only of the **Protection Cluster**? Or do the **HC, HCT, and senior leadership of individual organizations** see their role in tackling the more severe and prevalent protection risks?

Is the role of **local/national NGOs** viewed in terms of complementarity with external actors/international organizations (and vice versa)? Are there joined-up strategies involving local, national, and international capacities?

Evaluating commitments and monitoring progress

Section 3.4 (page 9) of the Policy emphasizes the need to evaluate commitments and monitor progress in placing protection central in humanitarian action. NGOs should also seek to identify mechanisms to evaluate whether actions are having a protection impact, whether decision-making is transparent, and whether overall accountability to affected people is being enhanced.

Contact

InterAction is providing support and guidance to NGOs regarding their role in implementation of the Policy. Please contact Liz Bloomfield, Program Manager - Protection, InterAction, lbloomfield@interaction.org

⁴ GPC Guidance Note on HCT Protection Strategy available at: http://www.globalprotectioncluster.org/assets/files/news_and_publications/hct-protection-strategies-provisional-guidance-final-september-2016.pdf

Key sections of the IASC Protection Policy

1. Background and purpose of the Policy (page 1-2)

This introductory section sets out the general context for the Policy, and highlights efforts to complement existing policies and initiatives in support of protection outcomes.

2. Defining the Centrality of Protection in humanitarian action (page 2-3)

The section defines protection as: “...all activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and spirit of the relevant bodies of law (i.e. international human rights law (IHRL), international humanitarian law (IHL) and international refugee law (IRL)”. It emphasizes that for a humanitarian response to be outcome-oriented, it is essential to understand and seek to prevent, mitigate or end the actual and potential risks producing the harm that affected people experience, which requires:

- Continuous analysis of risks people face: including threats, vulnerabilities, and capacities of affected people; commitment and capacities of duty bearers to address risk factors;
- Identification of measures: to reduce risks, avoid exacerbating risk, stop and prevent violations, avoid reinforcing existing patterns of violence, abuse, coercion and deliberate deprivation;
- Analysis provides the evidence-base for programming, advocacy, and dialogue.

3. Responsibility for the Centrality of Protection (page 3- 9)

This section addresses how the Centrality of Protection should be applied in practice, stressing that all humanitarian actors, irrespective of their sector-specific expertise, can contribute to protection of affected people in the following key areas.

- 3.1 Address protection issues that intersect with formal mandates and sector-specific responsibilities;
- 3.2 Engage collectively to achieve meaningful protection outcomes;
- 3.3 Mobilize other actors to contribute to collective protection outcomes;
- 3.4 Evaluate commitments and monitor progress in placing protection central in humanitarian action.

4. Implementation of the Policy (page 9-10)

This section emphasizes that all levels of leadership must hold themselves and their staff accountable for the effective and consistent implementation of the Policy, and sets out key commitments to advancing protection as an outcome. For example “Protection considerations, including the analysis of threats, vulnerabilities, capacities and the potential for unintended negative consequences are applied before, throughout and beyond a humanitarian response (in all aspects of the HPC), including in recovery and development activities”.

Acronyms and abbreviations (page 11-12) and Definitions (page 13 -15)

Annex I – Normative framework (page 16-24)

Provides an overview of IHL, IHRL, IRL, domestic/national laws, and traditional, social and cultural norms.

Annex II: Roles and responsibilities for the Centrality of Protection (page 25-29)

Outlines the roles and responsibilities of key actors at:

- Country-level: Including HC, HCT, Inter-Cluster Coordination mechanisms, Protection and other clusters.
- Global-level: Including Emergency Relief Coordinator, IASC Principals/Working Group/Emergency Directors Group, GPC and Areas of Responsibility.

Annex III: Guidance for information management (page 30)

Includes links for further information and guidance.

Annex IV: Framework for protection activities (page 31-32)

Sets out how specialized protection activities can be categorized in accordance with different levels of intervention: responsive action, remedial action and environment-building.

Annex V: Reference documents and standards (page 33-39)

Includes links to further information and guidance in specific areas, such as GBV and child protection.