

Danish Demining Group – Afghanistan

Humanitarian Accountability Framework

January, 2012

1. Afghan context

Afghanistan remains one of the countries most contaminated by landmines and explosive remnants of war (ERW), mainly the result of the 1992–1996 internal armed conflict and the decade-long war of resistance that followed the Soviet invasion of 1979. The United States-led coalition's intervention in late 2001 added considerable quantities of unexploded ordnance (UXO) to the problem, including (cluster) sub-munitions, and this was followed by further mine use by Non-State Armed Groups (NSAGs).

As a result of the recent wars in Afghanistan the ERW contamination throughout the country continues to pose a serious threat to the safety of the civilian population and deny access to valuable resources including agricultural & grazing land, roads, water sources and residential areas and hinders the repatriation of internally displaced persons (IDP) and refugees. In addition, the presence of mines and ERW is considered one of the major challenges in the implementation of relief, rehabilitation, and reconstruction and development programs in the country.

Afghanistan has the world's oldest and largest humanitarian mine action programme, dating back to 1988. Since its inception, involved organisations have worked towards both identifying the scale of the problem and clearing it. Between 1988 and January 2005 a total of 850 square kilometres (km²) had been identified as suspect hazardous areas (SHA). The current task list (as per September 2011) provided by the UNMACCA to all implementing partners (IPs) indicates that 6,265 suspect hazardous areas (SHAs) remain covering a total area of just over 606 km².

The Afghan National strategy -Mine Action Program of Afghanistan (MAPA)

The most recent Government of Afghanistan (GoA) endorsed strategy document for mine action was issued in May 2006. It is based on the GoA's vision of a country free from landmines and explosive remnants of war (ERW), where people and communities live in a safe environment conducive to national development, and where landmine and ERW survivors are fully integrated in the society and thus have their rights and needs recognized and fulfilled.

In order to realize the End-State Vision and following end goals the National Strategy aims to meet the targets of both the Afghan Compact and the Ottawa Convention. The objective of the Afghan

Compact in respect of mine action is that by the end of 2010, 'the land area contaminated by mines and unexploded ordnance will be reduced by 70%.' By April 2011 the Afghan Compact was met with 69% progress towards the goal. The reasons for not meeting the target are a complex combination of security, funding, and previously unknown hazard being added to the database, hence increasing the benchmark, whilst Afghanistan's current commitment to the Ottawa Convention requires that Afghanistan is mine impact free by the end of 2013. The UNMACCA as we speak is writing an extension document as it is clear that by the end of 2013 Afghanistan will not meet the targets of the Ottawa convention. It is not yet sure how long extension they are proposing, but all implementing partners (IPs) will be informed as soon as the document is finalized.

In 2002, the Government entrusted interim responsibility for MAPA coordination to the United Nations and UNMAS. As of January 2008, the GoA through the modality of the Inter-Ministerial Board for Mine Action (IMB) designated the Department of Mine Clearance(DMC) under the Afghanistan National Disaster Management Authority (ANDMA) to work jointly with UNMACCA. Hence, UNMACCA is responsible for: maintaining the national database of hazards, coordinating delivery of mine action services, recording and reporting implementation progress, and advocating for donor support.

While working towards the transition to Government responsibility for mine action policy and coordination, the UNMACCA must continue to respond to the humanitarian and development constraints posed by contamination with an approach that ensures appropriate assets are directed to the areas of highest priority designed to meet national and international targets and the GoA Strategic Mine Action Goals.

2. DDG Afghanistan - mandate and objectives

DDG is a humanitarian mine action unit in DRC established in 1997 and based upon support to three instruments of international law;(i) the Ottawa Convention on Anti-Personnel Landmines, (ii) the Convention on Certain Conventional Weapons, including protocol V from 2003 addressing Explosive Remnants of War (ERW), (iii) the Convention on Cluster Munitions. In addition, DDG operates in Afghanistan to support of the GoA and the MAPA in achieving the aims of the Afghanistan Compact and compliance with the Ottawa Convention.

DDG has operated in Afghanistan since 1998 and have recovered and disposed up to 33,000 landmines and 1.3 million pieces of unexploded ordnances. The beneficiaries of these years of operation include recently returned refugees from Iran and Pakistan, vulnerable rural populations and the wider humanitarian and development community.

DDG expects to remain active in Afghanistan at least until 2013 when the high priority tasks are expected to be completed. According to the National Mine Action Strategy (2008-2013) it is expected that it will be necessary to continue mine clearance operations in Afghanistan at least until 2015 in order to achieve zero impact status.

In-country capacity

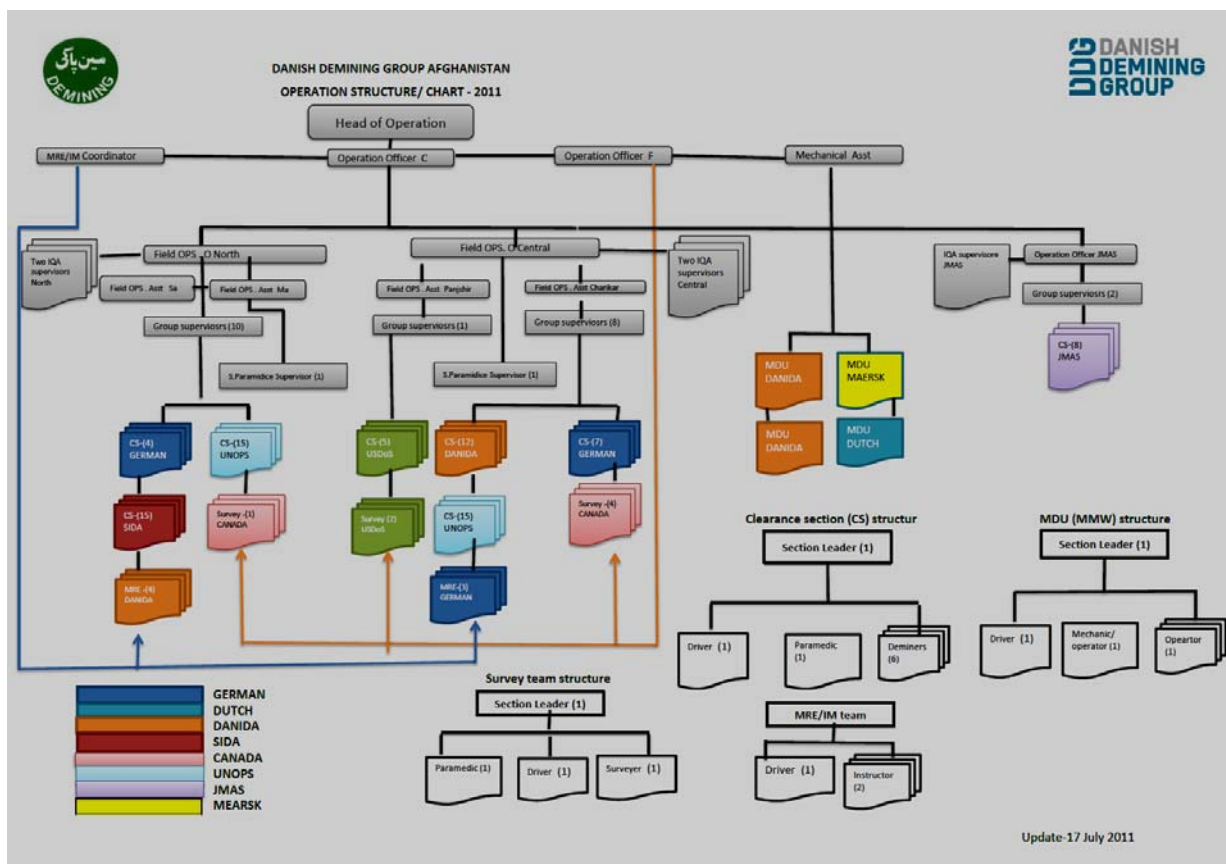
DDG maintains a HQ in Kabul and two Field Offices; one in the Central and one in the Northern Region. The HQ provides overall management and support to the entire program in Afghanistan, while the Field Offices provide support and monitoring to the operational assets deployed within their area of responsibility.

DDG currently employs approximately 10 International staff and 850 National Staff and operational assets include:

- 76 x Clearance Sections
- 4 x Mechanical Demining Units (2 Mini-Minewolfs and 2 Excavators)
- 6 x Survey Teams
- 7 x MRE & Impact Monitoring Teams

Organizational structure of DDG Afghanistan

The organizational chart below illustrates the current structure of DDG Afghanistan including donors and staff line functions.



2.1. Objectives for DDG Afghanistan - DDG as partner to theGoA

The strategic objective of DDG Afghanistan is:

‘to assist the Government of Afghanistan, the Mine Action Programme Afghanistan (MAPA) and the United Nations Mine Action Centre Afghanistan (UNMACCA) in achieving the aims of the Afghanistan Compact and compliance with the Ottawa Convention’

Immediate objective 1:

‘The facilitation of the resettlement for IDPs and the regeneration of livelihoods through mine and UXO clearance in selected high priority areas appointed by the UNMACCA’

To reduce the threat and impact of ERW on the civilian population of Afghanistan thereby enhancing human security by clearing landmines and unexploded ordnance, particularly in those areas identified by the Afghan Government as high-medium priority for the return of IDPs and the regeneration of livelihoods regaining access to valuable resources including agricultural & grazing land, roads, water sources and residential areas.

Immediate objective 2:

‘Mitigate the risk posed by mines and UXO through information sharing and coordinating the activities of Mine Risk Education teams’

The End Goal for MRE will be achieved when a comprehensive and sustainable system is in place to educate and raise awareness throughout people and communities nationwide regarding the residual mine/ERW threats. This includes sufficient information to recognize and report these items to the appropriate authorities.

3. DDG Afghanistan is committed to working within or meeting the requirements of the following codes, laws, standards, etc.

In order for DDG to maintain its role in support to the GoA and the MAPA in achieving its strategic objectives (Afghan Compact and compliance with the Ottawa Treaty), and for DDG to justify the future presence of operations in Afghanistan, DDG Afghanistan is committed to promote and follow:

- The standards for humanitarian assistance listed in the DRC global HAF (available on www.drc.dk)
- Cooperation with local communities, national authorities and relevant partners to improve Implementation of the MAPA and to promote solutions to the residual problem of mine/UXO contaminated areas in Afghanistan, particularly with a view to improve the livelihoods of beneficiaries in local communities
- National labour laws
- NGO registration requirements and visa conditions
- United Nations Mine Action Standards (IMAS)
- Afghanistan Mine Action Standards (AMAS)

- DDG Afghanistan SOPs

4. DDG Afghanistan relations to stakeholders and beneficiaries

In DDG Afghanistan we wish to be accountable. Not only to our donors and in meeting our strategic and immediate objectives through daily operations, but most importantly those we try to assist

In line with commitments, we consider it important to inform and provide our beneficiary communities and relevant stakeholders with information about our Humanitarian Accountability Framework where the organisation deems it safe to do so. However, due to a highly sensitive and complex situation and the general concern about security DDG Afghanistan opt for a low profile approach. Therefore, DDG will avoid making information publicly available and instead work in close cooperation with relevant stakeholders, local authorities and community leaders to identify and liaise with beneficiaries, while to the extent it is considered safe ensure beneficiaries' participation throughout programs and project cycles. This is secured through the following approaches.

DDG is accountable to the UNMACCA - DDG Afghanistan is accountable to the United Nations Mine Action Coordination Centre for Afghanistan (UNMACCA) and designated AMAC for the quality of our work. We provide these stakeholders with regular reports on our progress, in both mine clearance and Mine Risk Education classes, and DDG Afghanistan is subject to regular external Quality Assessment conducted by these partners.

In addition, both of the main outputs of the survey/monitoring capacity at DDG will support the UNMACCA and regional AMAC in working towards reducing the amount of unaffected ground currently included in the national database and providing up to date information on those areas that remain affected. This information once in the national database could then be accessed and utilized by any of the Humanitarian Mine Action (HMA) implementing partners currently accredited by the UNMACCA.

*Polygon Survey / re-survey*¹- In order to update existing information on mine/UXO contaminated areas survey teams are deployed. By conducting up to date 'Polygon Surveys' they will identify either Suspected Hazardous Areas which no longer present a threat to beneficiary communities and can therefore be discredited, or where a problem remains will accurately define the limitations of the threat for an accurate and efficient deployment of clearance assets. The affected communities within DDGs operational areas will play a direct role in providing DDG survey teams with salient information enabling the teams to better and more accurately identify remaining minefields and their actual size, threat and risk.

Impact monitoring – DDG Afghanistan have implemented an Impact Monitoring tool to evaluate the kind and scale of impact achieved by our clearance operations. The impact monitoring tool not only helps us to identify where each programme and activity can adjust and change to maximize

¹“Polygons” represent information on maps provided by the community interview/visual inspection process and subsequently geo-referenced in IMSMA or a geographic/geospatial information system (GIS) for succeeding analysis. These polygons represent the suspected contaminated area.

impact. It also acts as a tool for gathering information about our activities through meetings with local officials and IDPs that have returned and the bearing it has had on the recipients and any further needs they may have. The Impact Monitoring process is fully inclusive and dependant on the active participation of beneficiaries and local communities, and further strengthens and builds on our data which is then disseminated to relevant IPs.

Clearance Support Sections– This involves a fully trained and equipped clearance unit deployed under the DDG programmes Standard Operating Procedures (SOP) for demining preparing a task in advance of the deployment of full clearance assets. Using reports provided by the existing survey capacity and under the direction of the programmes Operations department these sections will be used to install base-lanes, admin and medical points, parking areas, explosives storage and demolition pits. This will allow clearance assets to be deployed in larger numbers and directly onto suspect ground. During the preparation of Clearing Sections these teams are in constant liaisons with the local population to ensure their safety and to mitigate the risk of incidents occurring during operations.

Mine Risk Education– DDG Afghanistan conducts Mine Risk Education courses to make local populations more aware of the dangers presented by contaminated land. We seek to provide beneficiaries with mine/UXO awareness of the threat and risks in contaminated areas and how to adopt safe behaviour. These classes are conducted in villages in the proximity of minefields where work performed on tasks is pending or on-going. Classes are held for men, women, boys and girls and all content/materials are presented by locally hired individuals in audience dialects.

Clearance – During clearance operations in the field constant contact is maintained between DDGs operational staff and the local communities to ensure that safety and the needs of the beneficiaries are best met. Upon finalizing clearance tasks they are subject to a ‘hand-over’ ceremony which involves the participation of local community elders and beneficiaries in general.

Complaint mechanisms–DDG Afghanistan have developed a formal complaint mechanism where written complaint is accepted and is dealt with by DDG Afghanistan, in cooperation with DRC HQ HR department. This complaint mechanism includes the use of a standardised complaint sheet indicating the procedure, tracking and verification system of any complaints reported. (Appendix – A)

5. List of DDG Afghanistan projects

Donor	Project Start	Project End	Total Months	Funding Total	Status
DANIDA	01/04/2011	31/12/2011	9	DKK 6,500,000	Current
Dutch MFA	01/01/2008	31/12/2011	48	€ 1,200,000	Current
German FFO	01/02/2011	31/01/2012	12	€ 700,000	Current
SIDA	01/10/2010	30/09/2013	36	SEK 45,000,000	Current

DFAIT Canada	01/04/2011	31/03/2012	11	CAN\$ 900,000	Current
UNOPS	01/09/2010	31/08/2012	24	\$ 5,157,933	Current
US DoS	01/09/2011	31/08/2012	12	\$ 1,516,000	Current
MAERSK	01/05/2010	31/10/2011	18	DKK 7,600,000	Current
Dutch MFA	01/01/2012	30/06/2012	6	€ 150,000	Current
DANIDA	01/01/2012	31/12/2012	12	DKK 9,000,000	Current

6. Essence of Accountability Baseline and Accountability Improvement Plan 2012

The DRC/DDG Operations Handbook and Programme Handbook have been distributed among management in the field.

HAF has been drafted and will be finalised and distributed for posting. HAP will be introduced to senior managers. AIP is completed with references to the HAP self-assessment.

- Management will ensure that the whole accountability framework will be strengthened and become fully operational by the end of 2012, based on lessons learnt from 2011 and the Annual Review in 2012, and in line with an updated regional Strategic Programme Document.
- Managers' and staff's responsibilities for implementing the HAF are clarified at all levels.
 - A plan for closing gaps in meeting the HAF is elaborated in consultation with relevant staff and stakeholders.
- New/old staff will receive training/refreshers, as required for meeting their role in implementing the actual HAF with due consideration of the security situation in Afghanistan
- Information sharing with beneficiaries and stakeholders will be strengthened with due consideration of the security situation in Afghanistan and in accordance with a pilot contextual policy and plan for sharing of information.
- The annual programme review will include an analysis of performance against the HAP benchmarks, complaints and other feedback received, based on prior collection of data from stakeholders.
- Findings from monitoring and evaluations, complaints and other learning process will be reflected in the design of new activities.

Appendix - A

DDG Afghanistan - Complaints Procedure	
Author: Southern Craib	Title: Programme Manager
Date: 1 October 2011	Version: 2
Summary: This procedure covers the handling of complaints made against the DDG Afghanistan. The procedure supports the policy and principles outlined in the DRC Programme Handbook and this should be read in conjunction with the handbook. The procedure applies to all DDG Afghanistan staff and working practices.	
Publication/Distribution: <ul style="list-style-type: none">• Distributed to Designated Persons and Complainants	

1. Introduction

DDG Afghanistan is committed to providing the highest standards of services to its beneficiaries and stakeholders.

When the organisation fails to meet expectations a formal mechanism for redress is available.

This system is essential to maintain DDGs reputation and its relationship with beneficiaries, donors and National Authorities.

The following describes, in broad strokes, how the complaints mechanism works, the reporting chain and the actions to be taken.

2. Definition of a Complaint

A Complain is: "The expression of a grievance".

Complaints in the instance of DDG Afghanistan can broadly be divided into two types:

External Complaints: Those made by an individual or individuals not employed by DDG with reference to the performance or behaviour of the organisation or any of its offers and staff.

Internal Complaints: Those made by an employee or employees with regard to the organisation or other members of staff.

All formal complaints must be in written form.

3. External Complaints

In Afghanistan, DDG operates under the umbrella of the United Nations Mine Action Coordination Centre for Afghanistan (UNMACCA) and is beholden to them in their Area Mine Action Centres

(AMAC) for the quality of its work. Complaints regarding DDGs operational performance should therefore be directed to either the AMAC or MACCA.

Upon completion, all tasks are subject to a 'hand-over' process that has to be approved by both the local community (beneficiaries) and the UNMACCA/AMAC. This system provides a direct link between those impacted by poor operational performance and those responsible for policing it. DDG does not directly respond to beneficiaries complaints as this would be deemed a potential conflict of interest and could be seen as less than transparent.

Minor concerns or complaints are regularly sought out by DDG Afghanistan Internal Quality Assurance Teams who then report and recommend corrective action.

4. Internal Complaints

Internal complaints within DDG Afghanistan are reported through the chain of command unless the complainant's issue is directly with his or her immediate supervisor.

Where possible, a meeting is convened where accusations are dealt with face to face and arbitrated by either a Department Head, the Head of Finance & Administration (HoFA) or the Programme Manager (PM).

In instances where the complainant is dissatisfied with the decision or findings of this arbitration they are able to avail themselves of existing mechanisms within the Government of Afghanistan's Ministry of Labour.

5. Roles and Responsibilities

The designate for complaints (Complaints Manager) within DDG Afghanistan is the HoFA and in their absence, the PM.

External complaints as described above will come to the attention of DDG through either the AMAC or the UNMACCA and will be dealt with directly by the PM or Acting PM.

Internal complaints will be handled by the HoFA or in their absence the PM who will convene an arbitration panel that includes the HoFA/PM, the relevant Department Head and one member of the Senior National Staff (in most cases the National Operations Manager).

Internal complaints that are not resolved at this stage and are taken to a National Authority will be dealt with by the PM and the HoFA.

All instances of both Internal and External complaints will be recorded in a 'Complaints Logbook' and all relevant paperwork and correspondence archived.

DDG Afghanistan is subject to the final decisions of the Government of Afghanistan, its Ministries and Officers upon receipt of official, written notifications of said decision.

6. Administrative Handling of Complaints

When received, the letter of complaint should be dated, stamped and signed by the complainant's line manager (or other designated supervisor) and the HoFA or another officer in the Human Resources Department.

After that, an entry will be made the Complaints Logbook and an Acknowledgement Letter (Appendix A) drafted to the complainant.

The HoFA will then take the following action:

- Conduct an investigation of the complaint and pass the evidence to the relevant line managers within one week of the complaint being received. Correspondence can be emailed or hand-delivered.
- Read the evidence and draft a final outcome letter, forwarding it to the PM.

7. Final Outcome Letters

The HoFA should draft a Final Outcome Letter (Appendix C) on behalf of the PM within **15 working days** of the date the complaint letter was received. The letter should be sent, together with copies of the evidence, for approval and amendments. If it is not possible to complete the investigation within this time, the complainant should be sent a Holding Letter (Appendix B) to inform them of the reason for the delay and when they can expect to receive a final outcome. The PM should be informed and receive a copy of the holding letter. The final outcome letter is personally signed by the PM and sent to the complainant within **20 working days** of the date the complaint letter was received.

The letter is to be copied to:

- The Programme Manager, DDG Afghanistan
- DDG Afghanistan Complaints Manager
- Appropriate DDG HQ staff
- Another organization if the letter was received via their complaints process.

8. Complaints with Attorney's Correspondence

Any correspondence received with attorney requests/correspondence must be forwarded immediately to the HoFA by the recipient and copied to the PM. The PM will decide whether or not to engage the services of an attorney to respond to the correspondence.

9. Support for Staff Complained Against

Staff members need to be informed at the start when a complaint has been made against them. Individual members of staff should also see any letters of complaint in which they are mentioned. All staff named in the complaint must be updated during the process and informed of the outcome of the complaint. Staff members may need support and assistance in the preparation of reports of

evidence required during the complaints process and advised that they may want to contact their professional organization or trade union.

Feedback from senior DDG Afghanistan management to individual members of staff will be done via the line management structure.

10. Filing/Disposal

A copy of the final outcome letter is filed with all relevant documentation and kept in the HoFA's office. The prime complaints documentation should be retained for the period as set out within the DRC/DDG Retention and Destruction procedure. All transient copies/drafts and email held versions should be destroyed within 60 days.

The Complaints Logbook is used to log progress of all complaints. This should be maintained and updated after each action is taken in the complaints process.

Southern Craib
Programme Manager
Danish Demining Group
Afghanistan

01 October 2011

Appendices:

1. Acknowledgement Letter
2. Holding Letter for Complaint
3. Full Response Letter

Appendix 1 – Acknowledgement Letter

PRIVATE & CONFIDENTIAL

Re: Acknowledgement of complaint

Thank you for your letter dated *(insert date)* regarding *(give a brief nature of complaint)*.

Clearly the issues you raise are of great concern and please be assured that your complaint will be investigated thoroughly and a full reply will be forwarded to by *(enter date 20 working days from the date the complaint was received)*. If this is not possible I will contact you again to advise you of the position.

Your letter has also been passed to the Complaints Manager who has the responsibility for reviewing complaints.

If in the meantime if you would like to meet to discuss your complaint please contact me *(enter address, email and telephone number if appropriate)*.

The Programme Manager, DDG Afghanistan will write to you shortly to advise on the outcome of the investigation.

Yours sincerely,

Name/Title of Designated Person acknowledging complaint

Cc: Complaints Manager, DDG Afghanistan

(Appropriate Senior Manager if applicable)

Appendix 2 – Holding Letter for Complaints

PRIVATE & CONFIDENTIAL

I am writing further to my letter dated (*insert date*) to apologise for the delay in providing you with a reply to your complaint.

The delay has been caused by (*Provide reasons/explanation for delay*).

I expect to be able to respond to your complaint by [*insert date*], and apologise once again for the delay as I acknowledge that this is very frustrating. However, I can confirm that we are endeavouring to gather information to provide a full response to you as soon as is possible. Therefore, I would be grateful if you could afford us a little more time to complete this process. I will be in contact once again to provide you with a full and final response.

In the meantime, I trust you will not hesitate to contact me directly should you have any concerns or queries.

Yours Sincerely,

Name/Title of Designated Person

Cc: Complaints Manager, DDG Afghanistan

(Appropriate Senior Manager if applicable)

Appendix 3 – Full Response Letter

Our ref:

PRIVATE & CONFIDENTIAL

Re: Complaint about.....

I am writing to provide you with a full response to the complaint you raised in your letter dated *(insert date)* regarding *(brief summary if appropriate)*.

(Include full response of the issues raised within the complaint)

I would like to assure you that the issues you raised have been taken seriously and fully investigated. However, if you feel that this response does not address your complaint, or if you have any further questions, please contact *(name and contact number)*. We would also be happy to go through the details with you in person if this would be helpful.

However, if you are not happy with our investigation and response to your complaint, there are two options open to you.

You can request an independent review of your complaint. A trained, independent person will consider whether the issues raised have been fully addressed and whether a further response would be appropriate or whether a panel should look at the complaint.

Alternatively, for complaints the Labour Laws, you can choose not to request an Independent Review but can complain directly to the Labour Office. If you make a complaint to the Labour Office you cannot subsequently request an independent review of your complaint, even if the Labour office decides not to investigate it.

Yours sincerely,

Southern Craib
Programme Manager
Danish Demining Group
Afghanistan

Cc: Complaints Manager, DDG Afghanistan