

# Human Rights Protection Policy

*Asylum Research & Global Assistance*

## **Preamble**

**Asylum Research & Global Assistance (ARGA)** is founded upon the **non-negotiable principle that every human being possesses inherent dignity and equal, inalienable rights**. ARGA recognizes that the protection of human rights is not a discretionary aspiration, nor a purely aspirational ethical preference, but a **fundamental legal, moral, and institutional obligation** that must guide every aspect of its mission, governance, operations, partnerships, and public engagement. In all circumstances, ARGA affirms that the worth of the individual is paramount and that no organizational objective, administrative convenience, operational imperative, or external pressure may justify conduct that diminishes, ignores, or violates human dignity.

This Policy sets forth ARGA's unequivocal commitment to **protecting, promoting, respecting, and upholding human rights** in accordance with the **Universal Declaration of Human Rights (UDHR)**, the **International Covenant on Civil and Political Rights (ICCPR)**, and all other applicable international, regional, and domestic legal instruments, standards, and principles. ARGA further recognizes the relevance and authority of related human rights frameworks addressing civil, political, social, economic, and cultural rights, as well as the protection of persons in situations of vulnerability, displacement, persecution, detention, statelessness, conflict, and other forms of heightened risk. Where domestic law provides greater protection than international standards, ARGA shall apply the higher protective standard. Where legal systems are inconsistent, incomplete, or inadequately enforced, ARGA shall act in a manner that **most fully safeguards human dignity and the integrity of the individual**.

ARGA's commitment is comprehensive and unconditional. It applies to **all persons associated with ARGA**, including leadership, employees, officers, advisors, consultants, volunteers, contractors, interns, field personnel, agents, implementing partners, and any third parties acting on ARGA's behalf or under its direction. It further applies to all activities undertaken by ARGA, whether operational, advisory, research-based, humanitarian, administrative, advocacy-related, or collaborative in nature. No distinction shall be made between direct and indirect activity where ARGA's influence, control, or participation may affect human rights outcomes. ARGA therefore requires that human rights considerations be integrated into decision-making at every level, from strategic planning and partner selection to program design, delivery, monitoring, and review.

ARGA rejects, in the clearest and strongest terms, **all forms of discrimination, abuse, exploitation, neglect, coercion, arbitrary interference, and retaliation**. This prohibition extends to discrimination on any prohibited ground, including but not limited to race, ethnicity, color, sex, gender, gender identity, sexual orientation, age, language, religion or belief, nationality, national or social origin, disability, health status, marital or family status, migration

status, socioeconomic status, political opinion, or any other status protected by law or recognized under human rights principles. ARGA affirms that equality is not merely formal equivalence, but the active removal of barriers that prevent individuals and communities from enjoying their rights in practice.

In fulfilling this Policy, ARGA adopts a **human rights due diligence approach** grounded in prevention, identification, mitigation, accountability, and remedy. ARGA is committed to anticipating risks, assessing potential and actual impacts, implementing effective safeguards, and responding promptly and decisively where harm is alleged, suspected, or identified. This includes a duty to maintain clear reporting channels, preserve confidentiality to the extent consistent with law and safety, protect persons who raise concerns in good faith, and ensure that no individual suffers retaliation for reporting misconduct, participating in a review, or asserting rights. **Silence in the face of abuse is incompatible with ARGA's values and duties.** Equally, institutional delay, procedural opacity, or indifference to credible risk shall not be tolerated.

ARGA further recognizes that the protection of human rights requires more than compliance alone. It requires **moral seriousness, disciplined accountability, and an uncompromising commitment to remedy.** Where ARGA causes or contributes to harm, or where its operations are linked to adverse human rights consequences through acts or omissions, ARGA shall take appropriate corrective action, including investigation, cessation of harmful conduct, remediation, cooperation with competent authorities where appropriate, and review of systems and controls to prevent recurrence. ARGA shall not seek to minimize, conceal, or rationalize harm. Rather, it shall address human rights concerns with candor, urgency, and procedural fairness, while always prioritizing the safety, dignity, and lawful interests of affected persons.

This Policy also reflects ARGA's recognition that human rights are **interdependent, indivisible, and mutually reinforcing.** Civil and political freedoms cannot be meaningfully secured where basic security, lawful process, or personal integrity is denied; likewise, social, economic, and cultural rights cannot be genuinely protected where individuals are excluded from fair treatment, access to justice, or participation in decisions affecting their lives. ARGA therefore approaches human rights not as isolated legal entitlements, but as a coherent framework requiring respect for the whole person and the conditions necessary for human flourishing, self-determination, and lawful protection.

Accordingly, this Human Rights Protection Policy shall serve as a **binding internal standard of conduct** and a reference point for all ARGA operations, policies, procedures, training, oversight mechanisms, and external engagements. It is intended to ensure that ARGA's work is conducted with **professional rigor, legal precision, institutional integrity, and unwavering respect for human dignity.** No deviation from this Policy shall be justified by expediency, hierarchy, uncertainty, or external pressure. ARGA stands committed to the proposition that **human rights are universal, fundamental, and not subject to compromise.** Every person encountered through ARGA's work shall be treated with dignity,

fairness, respect, and lawful care, and ARGA shall continuously strive to ensure that its conduct reflects the highest standards of ethical responsibility and human rights protection.

## **I. CORE HUMAN RIGHTS PROTECTED**

### **A. Civil and Political Rights**

The protection of **civil and political rights** constitutes the foundation of any lawful, just, and rights-respecting order. These rights are not privileges conferred at the discretion of the State; they are **inherent, universal, and legally enforceable entitlements** belonging to every human being by virtue of human dignity alone. Foremost among them is the **right to life**, which imposes both a negative duty to refrain from arbitrary deprivation and a positive duty to establish and maintain effective safeguards, including **clear legal standards, independent investigations, accountability mechanisms, and robust due process protections**. No State authority, public institution, or private actor exercising delegated power may deprive a person of life except under the most stringent standards of law, necessity, legality, and proportionality, where such deprivation is never arbitrary and is subject to meaningful judicial oversight.

Equally absolute is the **prohibition of torture and of cruel, inhuman, or degrading treatment or punishment**. This prohibition admits **no exception, no justification, no derogation, and no balancing against public interest claims**. It applies in all contexts, including detention, interrogation, conflict, migration control, security operations, medical settings, and any environment in which a person is under the control or effective authority of another. The legal and moral imperative is unequivocal: human beings must never be subjected to conduct that annihilates dignity, inflicts severe physical or psychological suffering, or instrumentalizes pain as a tool of coercion, punishment, intimidation, or discrimination. States are therefore obliged not only to prevent such abuses but also to investigate them promptly, prosecute those responsible, provide effective remedies to victims, and ensure non-repetition through institutional reform.

The **right to liberty and security of person** is likewise central to the rule of law. No individual may be subjected to **arbitrary arrest, detention, disappearance, or other forms of unlawful restraint**. Any deprivation of liberty must be grounded in accessible law, ordered or reviewed by competent and independent authority, limited by legitimate purposes, and accompanied by procedural guarantees such as prompt notification of reasons, access to counsel, the ability to challenge detention before a tribunal, and timely judicial review. The law must protect against secret detention, indefinite detention, and detention used as a substitute for lawful process. The security of person further requires protection from threats, violence, harassment, and abuse, whether committed by State agents or tolerated by State inaction.

The freedoms of **thought, conscience, religion, expression, peaceful assembly, and association** are indispensable to personal autonomy, democratic participation, and civic accountability. They must be protected with the broadest lawful scope possible and may be restricted only where a limitation is **strictly prescribed by law, directed toward a legitimate and recognized aim, and demonstrably necessary and proportionate** in a democratic society. These rights include the freedom to hold beliefs without interference; to

manifest religion or belief individually or collectively, in public or private; to seek, receive, and impart information and ideas through any lawful medium; to assemble peacefully; and to associate with others for lawful purposes, including advocacy, labor organization, political participation, and human rights defense. Any restriction that is vague, discriminatory, overbroad, retaliatory, or imposed to suppress dissent is fundamentally incompatible with international human rights standards.

## **B. Economic, Social and Cultural Rights**

**Economic, social, and cultural rights** are not aspirational benefits to be postponed indefinitely; they are **binding rights requiring deliberate, sustained, and measurable realization**. Their legal force is grounded in the principle that human dignity cannot be secured where a person is denied the means to survive, to work with fairness, to access education, to receive healthcare, or to participate in social life on equal terms. The **right to work** entails more than the formal permission to seek employment. It requires access to decent and productive work under conditions of **fair remuneration, occupational safety and health, equal opportunity, freedom from discrimination, and protection from exploitation**. Employment conditions must comply with recognized labor norms, including those established through international labor standards, and must respect the worker's dignity, bodily integrity, and economic security. Forced labor, child labor, trafficking for labor exploitation, and discriminatory exclusion from employment are incompatible with lawful labor order and with the minimum demands of justice.

The **right to social security and an adequate standard of living** requires more than emergency charity or discretionary assistance. It requires a reliable social protection framework capable of preventing destitution, responding to vulnerability, and ensuring access to the basic conditions of a dignified existence. This includes **adequate food, safe and habitable housing, clean water, sanitation, essential healthcare, and the social support necessary to prevent deprivation from becoming structural or permanent**. The State bears a duty to establish systems that are accessible, transparent, non-discriminatory, and responsive to need, with special attention to individuals and communities facing poverty, displacement, disability, age-related vulnerability, or other circumstances of heightened risk. A rights-based approach rejects the normalization of deprivation; it demands that no person be left without the minimum conditions required for physical survival, personal development, and social participation.

The **right to education** is a decisive instrument of emancipation, equality, and long-term social stability. It requires **availability, accessibility, acceptability, and adaptability** of educational services. Education must be affordable, physically and economically accessible, and of sufficient quality to develop the full potential of the learner. It must be delivered in an environment free from discrimination, violence, indoctrination, and structural exclusion. Educational policy must ensure equal access for girls, boys, children with disabilities, displaced learners, minorities, indigenous communities, and other groups historically denied equal opportunity. Education is not merely the transmission of information; it is the formation of

capability, civic responsibility, and autonomy. For this reason, it must be protected as a matter of law and policy, not treated as a contingent administrative favor.

The **right to participate in cultural life** safeguards the ability of individuals and communities to preserve identity, transmit heritage, practice traditions, use language, and engage in artistic, intellectual, and spiritual expression. This right presupposes respect for **cultural diversity, intergenerational continuity, and the equal dignity of all cultural communities**. It forbids policies that erase identity, suppress language, destroy heritage, or marginalize communities from the institutions and spaces through which culture is lived and sustained. Cultural participation must be inclusive, non-discriminatory, and free from coercion, while remaining fully consistent with the equal rights and dignity of all persons.

### **C. Rights of Vulnerable Groups**

The protection of **vulnerable groups** requires more than formal equality; it requires **substantive equality, heightened diligence, and tailored safeguards** where risk, dependency, historical injustice, or structural exclusion are present. The law must recognize that equal treatment is not always equal protection, and that genuine justice often requires differentiated measures to ensure real access to rights.

**Children** are entitled to **special protection by reason of their age, dependency, and evolving capacities**. Their rights demand that all public and private conduct be guided by the **best interests of the child**, with priority given to survival, development, safety, family integrity where appropriate, and freedom from exploitation, abuse, trafficking, neglect, and hazardous labor. Children must have genuine access to education, healthcare, identity, and protection systems, and they must never be treated as expendable participants in economic, political, or social systems that profit from their vulnerability. The law must respond decisively to child labor, sexual exploitation, forced recruitment, corporal punishment, and all forms of violence, with enforcement mechanisms that are preventive, protective, and remedial.

**Women** are entitled to **full equality before the law and in practice**, including freedom from discrimination, coercion, violence, and subordinate legal status. Protection of women's rights requires active elimination of structural inequality, unequal pay, discriminatory access to resources, barriers to participation, and tolerance of gender-based violence in domestic, institutional, or public settings. The principle of dignity further requires respect for bodily autonomy and informed decision-making in matters affecting health, family life, and reproductive choice, within the framework of lawful medical ethics and human rights. States must adopt and enforce laws, institutions, and remedies that prevent abuse, protect survivors, and dismantle systems that normalize subordination.

**Persons with disabilities** are entitled to **equal recognition, accessibility, reasonable accommodation, and full inclusion** in all areas of life. Disability must never be used as a basis for exclusion, segregation, deprivation of legal capacity, or denial of services. Public and private environments must be made accessible, communication must be adapted where necessary, and accommodations must be provided in good faith and without undue burden. Inclusion is not a discretionary policy preference; it is a legal and moral obligation flowing from

equal dignity and the right to participate on equal terms in education, work, public life, healthcare, justice, and culture.

**Minorities and indigenous peoples** are entitled to protection of identity, language, religion, customs, land-related interests where applicable, and collective cultural continuity. The law must prohibit **discrimination, assimilation by coercion, cultural erasure, and exclusion from decision-making affecting their communities**. Respect for these groups requires not only the absence of interference but also the presence of affirmative safeguards for cultural preservation, meaningful consultation, and equal participation in public life. A rights-respecting order acknowledges that the destruction of identity is a form of harm as serious as the denial of material necessity, because both attack the conditions under which human dignity can survive.

In sum, the rights set out above are **non-negotiable obligations of law, conscience, and governance**. They must be interpreted and applied in a manner that is **victim-centered, dignity-driven, non-discriminatory, and uncompromising in the face of abuse**. Any institution purporting to act in the name of justice must accept that these rights are not rhetorical ideals; they are **binding standards of conduct**, requiring prevention, protection, accountability, and effective remedy in every case, without exception.

## **II. ORGANIZATIONAL COMMITMENTS**

### **A. Workplace Rights**

ASYLUM RESEARCH & GLOBAL ASSISTANCE affirms that **workplace dignity, equality, and safety are non-negotiable obligations**, not discretionary aspirations. The Organization shall maintain a work environment grounded in **equal opportunity, merit-based assessment, and respect for the inherent worth of every person**. Employment decisions, including recruitment, selection, assignment, promotion, compensation, discipline, training, and termination, shall be made **solely on the basis of professional qualifications, demonstrated performance, operational need, and lawful criteria**, and shall be free from any form of discrimination, direct or indirect, on any prohibited ground. The Organization maintains **zero tolerance for discrimination, harassment, retaliation, intimidation, coercion, or exclusion**, whether arising from race, color, sex, gender identity or expression, sexual orientation, age, disability, religion, nationality, ethnicity, language, marital status, pregnancy, political opinion, social origin, membership in a union, refugee or migrant status, or any other status protected by applicable law or recognized under internationally accepted human rights standards.

The Organization further recognizes **freedom of association and the right to collective representation** as fundamental rights. Personnel shall not be obstructed, penalized, or discriminated against for joining, forming, or supporting lawful worker organizations, trade unions, or collective bargaining structures. Where collective bargaining is lawful and applicable, ASYLUM RESEARCH & GLOBAL ASSISTANCE shall engage in **good-faith dialogue** with authorized representatives and shall not undermine lawful worker participation. The Organization shall ensure that all such rights are exercised in an environment free from

surveillance, coercion, or reprisals, and that employees are able to raise concerns, organize collectively, and seek representation without fear of adverse consequences.

The Organization is equally committed to **safe and healthy working conditions** as a matter of operational integrity and moral responsibility. It shall implement hazard identification and risk assessment processes, preventive controls, emergency preparedness protocols, and incident reporting systems designed to prevent occupational injury, illness, and exposure to avoidable harm. All personnel shall have access to appropriate training, equipment, supervision, and information necessary to perform their duties safely. The Organization shall also recognize that **psychological safety is inseparable from physical safety**; accordingly, it shall promote mental health support, reasonable workload management, trauma-aware supervision where relevant, access to confidential support mechanisms, and a workplace culture that does not normalize burnout, humiliation, or neglect. Safety obligations extend to field operations, travel, remote work arrangements, and any location where Organization-related duties are performed.

Compensation and benefits shall reflect the Organization's commitment to **a living wage and basic human dignity**. Salaries and remuneration packages shall meet or exceed applicable legal minimums and shall be structured to ensure that personnel are not compelled to live in conditions inconsistent with decency, stability, or personal security. Where feasible and lawful, compensation should be aligned with a **living wage standard** applicable to the local context and supplemented by benefits that may include healthcare, retirement contributions, paid leave, and other protections consistent with responsible employment practice. ASYLUM RESEARCH & GLOBAL ASSISTANCE shall not exploit vulnerability, uncertainty, or economic dependence in any form of employment relationship.

## **B. Program Implementation**

In all programmatic activity, ASYLUM RESEARCH & GLOBAL ASSISTANCE shall be governed by the **"do no harm" principle**, which requires that no initiative be designed, approved, or implemented without a rigorous assessment of its potential adverse effects on human rights, safety, dignity, privacy, access to services, social cohesion, and community well-being. Prior to launch, programs shall be reviewed for foreseeable risks, including the risk of exclusion, stigmatization, retaliation, unintended disclosure, dependency, distortion of local power dynamics, or any other negative consequence that could arise directly or indirectly from the Organization's intervention. Where material risk is identified, the Organization shall either redesign the program, implement robust mitigation measures, or decline to proceed. **Operational success can never justify foreseeable rights-based harm.**

The Organization shall ensure that all beneficiaries and participants are provided with **informed consent** that is meaningful, voluntary, and comprehensible. Consent shall never be presumed, manipulated, or obtained through pressure, dependency, or unequal power. Individuals must receive clear, accurate, and accessible information regarding the purpose of the program, the nature of participation, the collection and use of personal data, confidentiality limitations, possible risks, foreseeable benefits, alternatives where relevant, and the right to decline or withdraw without unlawful penalty or loss of entitled support. Particular care shall be taken where beneficiaries face linguistic, educational, cultural, legal, or psychosocial barriers to

understanding. Consent procedures must be adapted to the context so that participation reflects **true autonomy rather than administrative formality**.

Accountability shall be embedded in every stage of implementation. ASYLUM RESEARCH & GLOBAL ASSISTANCE shall maintain **accessible, confidential, and credible grievance mechanisms** through which complaints, concerns, allegations of misconduct, and reports of harm may be raised without fear of reprisal. Every complaint shall be taken seriously, documented appropriately, assessed promptly, and investigated impartially according to the severity and nature of the allegation. Where wrongdoing, negligence, abuse, or rights violations are substantiated, the Organization shall provide **effective remediation**, which may include corrective action, cessation of harmful conduct, apology where appropriate, restoration of services, referral to competent authorities, compensation, safeguarding measures, disciplinary action, and systemic reform. Accountability is not satisfied by acknowledgement alone; it requires **truthful inquiry, meaningful correction, and measurable prevention of recurrence**.

### **C. Community Engagement**

ASYLUM RESEARCH & GLOBAL ASSISTANCE shall conduct its work in a manner that recognizes communities not as passive recipients of intervention, but as **rights-bearing participants in decisions that affect their lives**. Where programs, research, advocacy, or operational activities may alter community conditions, the Organization shall undertake genuine consultation with affected individuals and groups at an early stage and throughout implementation. Consultation must be more than symbolic outreach; it must be a **structured and good-faith process of listening, information-sharing, and response**, through which community perspectives influence design, implementation, monitoring, and adjustment. The Organization shall give due regard to local knowledge, lived experience, and community-defined priorities, particularly where the affected population has historically been excluded from decision-making or exposed to institutional harm.

Respect for culture shall be treated as a binding operational requirement. The Organization shall ensure that all programming is **culturally competent, context-sensitive, and respectful of local customs, traditions, belief systems, and social structures**, provided that such respect does not excuse or perpetuate human rights abuse. Cultural respect means engaging communities without paternalism, avoiding unnecessary disruption, and tailoring communications, procedures, and interventions to local realities in a manner that preserves dignity and autonomy. It also requires that personnel act with restraint, humility, and discipline, refraining from imposing external values in ways that are careless, coercive, or dismissive of local identity. **Respect for culture and fidelity to human rights are complementary obligations, not competing ones.**

For any activity that may affect Indigenous peoples, minority groups, or other communities possessing distinct collective rights, the Organization shall recognize and uphold **Free, Prior, and Informed Consent (FPIC)** as an essential prerequisite where required by applicable law, recognized international standards, or the nature of the intervention. FPIC requires that consent be sought **freely, without coercion or manipulation; prior, before commitments are**

**fixed or harm is underway; informed, through complete and accessible disclosure; and consent, meaning a real ability to approve, decline, or withhold agreement.** This standard is particularly critical where activities may affect land, territory, resources, identity, heritage, access to services, or community self-determination. ASYLUM RESEARCH & GLOBAL ASSISTANCE shall not proceed in a manner that disregards collective rights, bypasses legitimate community authority, or treats consultation as a substitute for lawful consent where such consent is required. **The Organization's legitimacy depends upon trust, and trust depends upon consent that is genuine, informed, and honored in practice.**

### **III. DUE DILIGENCE & RISK MITIGATION**

ASYLUM RESEARCH & GLOBAL ASSISTANCE shall apply a rigorous, preventive, and continuously monitored due diligence framework to all new programs, strategic partnerships, operational engagements, and third-party relationships. This framework is designed to ensure that **no activity is initiated, continued, financed, or endorsed where there is an unreasonable, unmitigated, or unacceptable risk of human rights harm.** The organization recognizes that due diligence is not a formalistic exercise, but a **substantive duty of care**, requiring active scrutiny, documented decision-making, timely intervention, and effective remediation wherever adverse impacts are identified or reasonably foreseeable.

Accordingly, due diligence shall operate as an integrated governance mechanism encompassing **risk identification, structured assessment, partner vetting, continuous oversight, escalation, corrective action, and remedy.** These obligations apply with particular rigor to any program, contract, or partnership with a value of **€50,000 or more**, or to any initiative presenting elevated legal, ethical, reputational, security, or beneficiary-protection risk, regardless of financial value. The organization shall adopt a **zero-tolerance posture toward complicity in abuse, exploitation, discrimination, coercion, forced displacement, unlawful detention, trafficking, torture, inhuman treatment, or any other serious human rights violation.**

#### **Human Rights Impact Assessment (HRIA)**

A **Human Rights Impact Assessment (HRIA)** shall be mandatory prior to approval, **launch, or renewal** of any new program, partnership, or material expansion of an existing engagement valued at **€50,000 or above.** The HRIA shall not be treated as a generic risk checklist. It must be a **systematic, evidence-based, and context-specific analysis** of the actual and potential human rights effects associated with the proposed activity, including direct, indirect, cumulative, and foreseeable impacts. The assessment shall consider, at minimum, the legal and operational environment, the vulnerability of affected populations, the conduct and capacity of implementing and associated parties, the project design, access barriers, safeguarding implications, data protection implications, and any risk that the activity may contribute to or become linked with human rights abuse.

The HRIA shall be conducted early enough to influence decisions in a meaningful way, and shall be documented in a form sufficient to demonstrate **informed approval, reasoned mitigation planning, and senior accountability.** Where the assessment identifies material risk, the

program shall not proceed unless robust mitigation measures are adopted, responsibilities are clearly assigned, timelines are fixed, and residual risk is determined to be acceptable under the organization's ethical and legal standards. **No commercial, operational, or reputational consideration shall justify proceeding where serious human rights harm remains unmitigated.**

### **Screening of Contractors, Partners, and Associated Parties**

All contractors, consultants, implementing partners, subgrantees, vendors, agents, intermediaries, and other associated parties shall be subject to **pre-engagement screening** and, where relevant, periodic re-screening throughout the life of the relationship. Screening shall include due inquiry into the entity's and key personnel's **historical and current involvement in human rights violations, abusive conduct, corruption, exploitation, unlawful labor practices, discrimination, or other serious misconduct**, as well as any record of sanctions, credible allegations, litigation, regulatory findings, or adverse findings by authoritative bodies, investigative institutions, or reliable public sources.

This assessment shall extend beyond nominal corporate identity to examine **ownership, control, beneficial ownership, affiliate relationships, subcontracting chains, and de facto operational influence**, so as to prevent circumvention through layered structures or indirect participation. ASYLUM RESEARCH & GLOBAL ASSISTANCE shall not engage or continue to engage any party where the available information indicates a material risk of complicity in abuse, unless and until that risk has been independently evaluated, effectively mitigated, and formally authorized at the appropriate level of governance. **The organization shall not rely on assurances unsupported by evidence, nor on reputational statements unsupported by verifiable conduct.**

### **Monitoring and Ongoing Oversight**

Due diligence does not conclude at the point of contract execution. All programs and partnerships shall be subject to **ongoing monitoring** to detect emerging human rights risks, operational deviations, partner misconduct, beneficiary harm, safeguarding failures, or changes in context that materially alter the risk profile of the activity. Monitoring shall be proportionate to risk but sufficiently robust to ensure that issues are identified early, escalated without delay, and addressed before they result in further harm.

Monitoring mechanisms may include structured reporting, site-level oversight, review of incident logs, partner performance evaluations, beneficiary feedback channels, audits, document review, and context updates concerning conflict, repression, displacement, or institutional breakdown. The organization shall maintain a **live risk register** for higher-risk engagements and shall reassess mitigation measures whenever there is a material change in scope, geography, partner composition, financing, or operating environment. Where monitoring reveals credible evidence of abuse, obstruction, retaliation, misrepresentation, or failure to implement required safeguards, the organization shall act promptly and decisively. **Inaction in the face of foreseeable harm shall be treated as a governance failure.**

## Remediation, Complaints, and Corrective Measures

Where adverse human rights impacts are alleged or identified, ASYLUM RESEARCH & GLOBAL ASSISTANCE shall ensure access to a **fair, accessible, confidential, and timely complaint and remediation process**. Complaints shall be received through clearly communicated channels and shall be assessed with procedural integrity, independence where appropriate, and due regard to the safety and dignity of complainants, witnesses, and affected communities. Investigations shall be conducted promptly, impartially, and with a standard of evidence appropriate to the seriousness of the allegation and the potential consequences for all parties.

Where a complaint is substantiated, or where reasonable grounds exist to believe that harm has occurred, the organization shall implement **corrective actions proportionate to the severity, scope, and persistence of the violation**. Such measures may include suspension of activities, suspension or termination of partnership, mandatory remediation plans, strengthened supervision, staff replacement, policy revision, disciplinary action, notification to relevant authorities where required, and any other measure necessary to prevent recurrence. Where appropriate and lawful, the organization shall facilitate **victim-centered compensation, restitution, rehabilitation, or other forms of remedy**, ensuring that the response is not merely procedural but substantively effective.

Remediation shall be guided by the principle that **the rights and dignity of affected persons are paramount**. No settlement, internal disposition, or operational expediency shall be permitted to obscure serious wrongdoing, suppress legitimate complaints, or deprive victims of meaningful remedy. **Where harm has been caused, the organization's obligation is not to manage reputational exposure, but to restore rights, prevent repetition, and uphold accountability.**

## Decision-Making and Escalation Standard

Any engagement presenting elevated or unresolved human rights risk shall be escalated to senior management and, where necessary, to the governing body for formal review. Approval shall be contingent on a documented showing that **risks have been identified, assessed, mitigated, and reduced to a level consistent with the organization's ethical commitments and legal obligations**. The burden shall rest on the proposing function to demonstrate why the engagement should proceed, not on affected persons to prove the full extent of potential harm before action is taken.

Where risk cannot be adequately mitigated, the organization shall refuse, suspend, or terminate the proposed or existing engagement. **No relationship is sufficiently important to override the duty to prevent serious human rights harm**. This principle shall govern all due diligence and risk mitigation decisions within ASYLUM RESEARCH & GLOBAL ASSISTANCE, reflecting the organization's unwavering commitment to lawful conduct, moral clarity, and the protection of human dignity.

## IV. VULNERABLE POPULATIONS

**ASYLUM RESEARCH & GLOBAL ASSISTANCE** recognizes that certain populations are exposed to heightened risk, acute deprivation, and systematic violations of fundamental rights in contexts of persecution, displacement, detention, and armed conflict. In such circumstances, the organization's duty is not merely humanitarian in a general sense; it is a **positive operational obligation** to prevent further harm, preserve dignity, secure lawful protection, and ensure that all interventions are conducted in strict conformity with **international human rights law, refugee law, humanitarian law, and the principle of non-discrimination**. All engagement with vulnerable populations shall be informed by **human dignity, legality, confidentiality, trauma sensitivity, and absolute opposition to refoulement, abuse, arbitrary detention, and discriminatory exclusion**.

### **A. Refugees & Internally Displaced Persons**

Refugees and internally displaced persons constitute a category of persons whose vulnerability is both immediate and prolonged, arising from forced displacement, loss of civil protection, severance from family and community structures, and exposure to ongoing risks in transit, reception, and place of displacement. **ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall prioritize the restoration of legal identity, the securing of procedural access, and the prevention of further exposure to persecution, exploitation, or statelessness. The organization shall assist individuals in navigating asylum and protection procedures by providing accurate legal orientation, documentation support, referral pathways, and coordination with competent authorities and service providers where such engagement does not compromise safety or confidentiality.

A core operational principle is **non-refoulement**, which shall be treated as an absolute and non-negotiable safeguard. No person shall be returned, directly or indirectly, to any territory, border zone, transit setting, or authority where there are substantial grounds to believe that the individual would face persecution, torture, cruel, inhuman, or degrading treatment or punishment, or any other serious violation of protected rights. This principle shall inform case screening, risk assessment, advocacy, emergency response, relocation planning, and all operational decisions involving mobility, transfer, or removal. **The prohibition of return to danger is a mandatory constraint on all activities.**

In addition to legal protection, refugees and internally displaced persons shall have access to **psychosocial support** that is responsive to trauma, loss, separation, and chronic insecurity. This includes trauma counseling, emotional stabilization support, family tracing and reunification assistance, and referral to specialized protection services where required. Such support shall be delivered in a manner that is culturally appropriate, confidential, survivor-centered, and designed to avoid re-traumatization. The organization shall treat family unity as a central protection concern and shall recognize that prolonged separation can itself constitute a continuing harm requiring urgent remedial action.

### **B. Political Prisoners & Detainees**

Political prisoners and detainees are among the most legally and ethically protected categories of persons, because their vulnerability is compounded by state power, restricted liberty, potential

misuse of criminal process, and heightened risk of abuse, coercion, torture, denial of due process, and incommunicado detention. **ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall approach such cases with particular rigor, discretion, and urgency. The organization's intervention shall be directed toward ensuring access to legal representation, communication with family members where lawful and safe, and observance of minimum standards of humane treatment under applicable law.

Where access is possible and appropriate, the organization shall support efforts to secure **effective legal defense**, independent review, and procedural safeguards, including the right to counsel, the right to inform family members, the right to challenge unlawful detention, and the right to medical assessment where abuse or mistreatment is alleged. In all such matters, the organization shall insist upon **due process, evidentiary integrity, and the presumption of innocence**, while recognizing that in politically motivated detention environments, formal legality may be used as a cover for substantive injustice. Accordingly, documentation and legal analysis must be carried out with precision, restraint, and evidentiary discipline.

The organization shall also engage in **strategic advocacy** where detention practices indicate systematic abuse, politically motivated prosecution, torture, or other gross violations. This may include the preparation of verified documentation for submission to relevant **United Nations mechanisms, regional human rights systems, special rapporteurs, treaty bodies, and other competent accountability forums**. Such advocacy shall be based on reliable facts, corroborated testimony where feasible, and strict confidentiality protocols. The objective is not publicity for its own sake, but **accountability, deterrence, protection, and remediation**. Every allegation of abuse must be approached as a serious matter requiring careful verification, lawful handling, and a moral posture that is uncompromising in the face of cruelty.

### **C. Persons Affected by Conflict**

Persons affected by conflict include civilians, community leaders, children, older persons, persons with disabilities, women and girls, minority groups, and others who are exposed to displacement, food insecurity, destruction of property, loss of access to health care, education disruption, family separation, and direct physical danger. **ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall ensure that humanitarian assistance is structured to serve all affected persons **without discrimination**, without political favoritism, and without conditioning aid on ethnicity, religion, nationality, legal status, gender, allegiance, or any other prohibited ground. Humanitarian access must be guided by **neutrality, impartiality, and necessity**, with assistance allocated according to assessed vulnerability and urgent need.

The organization shall design conflict-response measures on the basis of **trauma-informed and protection-centered methodology**. This requires recognition that conflict generates both visible and invisible harm: physical injury, displacement, bereavement, fear, hypervigilance, loss of agency, collective grief, and long-term social fragmentation. Interventions must therefore avoid any approach that is purely logistical or numerical and instead account for the psychological, social, and legal dimensions of harm. Staff and partners shall be trained to identify signs of acute distress, exposure to violence, and secondary victimization, and to respond in ways that preserve dignity, minimize harm, and support stabilization.

Where conflict has produced barriers to essential services, the organization shall advocate for and support **safe access to relief, documentation, medical care, legal information, and protection services**. Assistance shall not be distributed in a manner that reinforces exclusion or deepens existing inequality. The organization shall maintain the principle that **no person affected by conflict may be treated as collateral damage, administratively invisible, or morally expendable**. Every intervention must affirm the inherent worth of each affected individual and must be carried out with disciplined professionalism, rigorous accountability, and unwavering commitment to protection.

### **Cross-Cutting Standard**

Across all vulnerable population categories, **ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall operate on the basis that vulnerability is never a justification for neglect, coercion, simplification, or delay. Rather, vulnerability imposes a heightened duty of care, enhanced confidentiality, stronger procedural safeguards, and immediate attention to protection risks. All personnel, contractors, and partners shall act with **strict adherence to law, evidence-based judgment, ethical restraint, and moral seriousness**. In every instance, the organization shall prioritize **life, dignity, lawful protection, and the prevention of foreseeable harm**.

## **V. ACCOUNTABILITY & REMEDIATION**

**ASYLUM RESEARCH & GLOBAL ASSISTANCE** maintains a **strict, zero-tolerance accountability framework** for all actual, alleged, or reasonably suspected human rights violations, safeguarding failures, exploitation, abuse, harassment, retaliation, discrimination, coercion, or any other conduct that is inconsistent with applicable law, internationally recognized human rights standards, and the Organization's ethical obligations. Accountability is not treated as a discretionary managerial function; it is a **mandatory institutional duty**. Where harm has occurred or is credibly alleged to have occurred, the Organization shall act **promptly, impartially, confidentially, and without prejudice**, with the primary objectives of protecting affected persons, establishing the facts, preserving evidence, preventing recurrence, and ensuring that remedies are effective, proportionate, and meaningful.

### **1. Complaint Mechanism**

The Organization shall maintain **multiple, accessible, and safe reporting channels** through which any person may raise concerns regarding human rights violations or related misconduct. These channels shall be designed to be available to employees, contractors, consultants, partners, beneficiaries, community members, and any other affected person, regardless of location, status, language, disability, literacy, gender, or vulnerability.

The complaint mechanism shall be structured to ensure **confidentiality, accessibility, and procedural fairness**. Reports may be submitted through direct supervisory channels, designated compliance personnel, independent reporting functions, secure electronic platforms, or other approved confidential means. Where necessary, the Organization shall provide **interpretation, translation, disability accommodations, and alternative reporting formats** to remove barriers to access. Complainants shall not be required to identify themselves

in order to initiate a complaint, unless identification is necessary and voluntarily provided for the purpose of investigation or remedy.

The Organization shall ensure that reporting channels are **safe and trauma-informed**, meaning that they are operated in a manner that minimizes secondary harm, avoids unnecessary repetition of testimony, and respects dignity, autonomy, and confidentiality. All complaints shall be logged, time-stamped, and managed under controlled access protocols. Information shall be disclosed strictly on a **need-to-know basis**, and any disclosure beyond that threshold shall require a legitimate operational or legal justification.

## 2. Investigation

All **substantiated complaints** shall be subject to an **independent, impartial, and documented investigation** initiated without undue delay and ordinarily completed within **30 days**, unless the complexity, geographic reach, security conditions, evidentiary requirements, or legal constraints objectively require additional time. In such circumstances, the complainant, where identifiable and contactable, shall be informed of the delay, the reasons for it, and the anticipated timeline for completion.

Investigations shall be conducted by persons or functions that are **independent from the subject matter and from the individuals implicated**, and where necessary, by external investigators or specialist professionals. The investigating function shall have the authority to gather relevant documents, interview witnesses, preserve digital and physical evidence, assess credibility, and make reasoned findings based on the balance of probabilities or other applicable evidentiary standard. The process shall be **fair, confidential, survivor-centered, and free from conflicts of interest**.

Throughout the investigation, the Organization shall take reasonable interim measures to prevent further harm, including, where appropriate, temporary reassignment, restricted access, supervisory safeguards, or other proportionate protective steps. These measures shall not be punitive in character and shall never be used to burden, isolate, or disadvantage the complainant. At all stages, the Organization shall preserve **chain of custody**, maintain secure records, and document every material decision in a manner that can withstand internal review, external audit, or judicial scrutiny.

## 3. Remedies

Where a violation is confirmed, admitted, or otherwise substantiated, the Organization shall implement **prompt, effective, and proportionate remedies** tailored to the nature, severity, duration, and consequences of the harm. Remedies shall be designed not only to address the individual harm suffered, but also to correct the institutional conditions that enabled the violation and to prevent recurrence.

Remedial measures may include, where appropriate, **formal apology, written acknowledgment of harm, corrective action plans, restoration of rights, removal of adverse records, cessation of harmful conduct, modification of procedures, disciplinary measures against responsible persons, training reforms, policy revision,**

**and structural safeguards.** Where the facts and applicable law justify it, the Organization may also provide **financial compensation**, reimbursement of expenses, or other material redress. Any compensation shall be assessed in a manner that is fair, transparent, and proportionate to the injury, loss, or detriment sustained.

The Organization recognizes that remedy is not limited to monetary payment. In many cases, **non-monetary redress** may be equally essential, including public or private acknowledgment, reinstatement, referral to specialist services, medical or psychosocial support, legal assistance where appropriate, and measures restoring dignity, safety, and participation. The central principle shall be that the remedy must be **effective in fact, not merely symbolic in form.**

#### **4. Non-Retaliation**

The Organization shall maintain an **absolute prohibition on retaliation** against any person who, in good faith, reports a concern, participates in an investigation, requests assistance, supports another person in raising a concern, or otherwise cooperates with an accountability process. Retaliation includes, without limitation, dismissal, demotion, suspension, intimidation, threats, ostracism, discrimination, blacklisting, adverse contract treatment, wage or benefit manipulation, reputational harm, coercion, or any other adverse action that may reasonably deter reporting or cooperation.

Any allegation of retaliation shall itself be treated as a serious complaint and assessed with urgency. Where retaliation is substantiated, the Organization shall take **immediate corrective and disciplinary action**, restore the affected person's position or rights where feasible, and provide any additional remedy required to neutralize the harm. The burden of institutional integrity lies with the Organization; therefore, managers, supervisors, and decision-makers are expected to actively prevent retaliation, report suspected retaliatory conduct, and ensure that complainants are not placed at further risk.

The Organization will not tolerate the misuse of complaint processes for malicious purposes; however, **good-faith reporting shall always be protected**, even where a complaint is ultimately not substantiated. The protection of complainants, witnesses, and affected persons from adverse action is an essential element of lawful governance, ethical leadership, and credible human rights compliance.

**ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall retain records of complaints, investigations, outcomes, and remedies in a secure and auditable manner, subject to applicable privacy and confidentiality obligations. Trends and systemic findings shall be periodically reviewed at senior level to ensure that accountability is not merely reactive, but **preventive, corrective, and institutionally transformative.**

#### **VI. TRAINING & CAPACITY BUILDING**

**ASYLUM RESEARCH & GLOBAL ASSISTANCE** maintains the principle that **competent, rights-based, and ethically disciplined service delivery is not optional**; it is a core organizational obligation. Every staff member, consultant, contractor, volunteer, and any other person acting on behalf of the organization must receive training that is **timely, role-appropriate, documented, and demonstrably effective.** Training is treated as a **preventive**

**safeguard, a quality assurance mechanism, and a duty of care instrument** designed to ensure that all personnel understand and uphold the organization's standards, legal obligations, protection commitments, and operational responsibilities.

All training under this policy shall be delivered in a manner that reflects **legal precision, moral integrity, contextual relevance, and operational seriousness**. Training content must remain aligned with applicable international human rights standards, humanitarian principles, protection norms, safeguarding expectations, and the organization's internal code of conduct. Where a staff role involves direct engagement with vulnerable populations, crisis-affected communities, displaced persons, survivors of violence, or individuals with heightened protection needs, the training standard shall be **more stringent**, not less, and shall correspond to the specific risks and responsibilities associated with the role.

- **Mandatory foundational training:** All personnel must complete **Human Rights Fundamentals** within **30 days of hire, onboarding, or engagement**. This training shall be a minimum of **4 hours** and shall not be treated as a merely procedural requirement. It must provide a substantive understanding of **human dignity, non-discrimination, equality before the law, accountability, protection from abuse, informed consent, confidentiality, and the ethical treatment of all persons without exception**. The training shall also address the organization's expectations regarding professional conduct, reporting obligations, prevention of harm, conflict sensitivity, and the duty to act in accordance with both legal and moral imperatives. Completion shall be recorded in the organization's training register, and staff shall not be considered fully cleared for independent work until this requirement is satisfied. Where feasible, the training must include an assessment or acknowledgment mechanism confirming comprehension, not mere attendance.
- **Specialized training for field and operational staff:** Personnel assigned to fieldwork, partner coordination, case-related activity, assessments, monitoring, community engagement, referral pathways, or direct service delivery shall receive **specialized, role-specific training in humanitarian principles, protection frameworks, trauma-informed approaches, and safe engagement practices**. This training must ensure that staff understand the practical application of **humanity, neutrality, impartiality, independence, dignity, confidentiality, non-exploitation, and do-no-harm** in operational settings. It must also address the realities of working with persons who may be experiencing trauma, displacement, coercion, loss, fear, or acute vulnerability, with particular emphasis on **recognizing distress, avoiding re-traumatization, maintaining appropriate boundaries, and responding with restraint, sensitivity, and discipline**. Staff must be trained to identify protection concerns, understand referral thresholds, preserve privacy, manage information responsibly, and escalate risks in accordance with internal protocols. No field assignment may be treated as routine unless the staff member has received, understood, and been deemed competent in the required specialized training for that function.

- **Annual refresher and continuous capacity strengthening:** All staff shall complete a **minimum 2-hour annual refresher** focused on **emerging human rights issues, evolving protection risks, changes in legal or operational standards, organizational lessons learned, and case-study analysis**. This requirement exists because rights-based work is dynamic, and professional competence must be continuously renewed. The refresher training shall not be generic; it must be oriented toward the real and current operating environment of the organization, including developments affecting displacement, asylum, safeguarding, discrimination, gender-based violence, digital risk, coercion, documentation standards, and ethical decision-making under pressure. Case studies shall be used to reinforce practical judgment, identify common failures, highlight good practice, and ensure that personnel can translate principle into action. The annual update is also an accountability measure: it confirms that the organization does not permit outdated knowledge, informal improvisation, or complacency to substitute for professional competence.

In addition to the foregoing, **training compliance is mandatory and enforceable**. Supervisors are responsible for ensuring that their teams complete all required training within the prescribed timelines. Human resources, compliance, or designated program leadership must maintain accurate records of participation, completion dates, training content, and any remedial actions required. Where a staff member fails to complete required training, the organization may restrict duties, suspend field access, withhold certain assignments, or require immediate corrective action until compliance is achieved. **No operational convenience shall override the requirement for trained and competent personnel.**

Training materials shall be reviewed periodically to ensure they remain **current, legally sound, context-sensitive, and operationally relevant**. Updates shall be issued whenever there are changes in applicable law, protection standards, organizational policy, or risk environment. The organization shall also retain the right to introduce additional mandatory training at any time where the nature of the work, emerging incidents, audit findings, or programmatic risk indicates that further instruction is necessary. This reflects the organization's commitment to **continuous improvement, institutional responsibility, and uncompromising respect for human rights**.

## **VII. MONITORING & REPORTING**

**ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall maintain a **robust, continuous, and independently verifiable monitoring and reporting framework** designed to ensure that human rights obligations are not merely aspirational, but are **actively measured, documented, enforced, and continuously improved**. Monitoring shall operate as an essential mechanism of accountability, enabling the organization to detect risk, assess performance, remediate harm, and demonstrate, through credible evidence, its unwavering commitment to the **protection of human dignity, legality, transparency, and zero tolerance for rights violations**.

The monitoring function shall be implemented in a manner that is **systematic, evidence-based, and proportionate to risk**, with all relevant data collected, reviewed, and retained in accordance with applicable legal, regulatory, and confidentiality requirements. Where indicators

reveal actual or potential harm, the organization shall act without delay to investigate, mitigate, remediate, and prevent recurrence. **No violation, however minor in appearance, may be disregarded, normalized, or left unaddressed.**

### **1. Key Performance Indicators (KPIs)**

The organization shall track a defined set of human rights KPIs to ensure that performance is objectively measurable and substantively meaningful. At a minimum, the following indicators shall be monitored:

- **Human rights violations reported and investigated:** The organization shall record the number, nature, source, and status of all reported human rights concerns, allegations, incidents, and formal complaints. This shall include whether each matter was accepted for review, investigated, substantiated, referred, escalated, or closed, together with the time taken at each stage. The purpose of this indicator is not merely statistical. It is to ensure that **every credible concern is treated as a serious compliance matter**, that investigative pathways are functioning effectively, and that patterns of repeated or systemic harm are identified promptly. A low number of reports shall not be interpreted as proof of compliance unless corroborated by accessible reporting channels, awareness measures, and independent verification.
- **Remediation rate:** The organization shall measure the percentage of substantiated cases in which corrective, restorative, disciplinary, policy, procedural, or operational remediation has been completed within established timeframes. Remediation shall be assessed not only by whether a response occurred, but by whether the response was **timely, proportionate, effective, and capable of preventing recurrence**. Where adverse impacts are identified, the organization shall prioritize meaningful remediation for affected persons, including, where appropriate, cessation of harmful conduct, correction of unsafe practices, restoration of rights, compensation where legally required, and structural reform where necessary. The remediation rate shall therefore serve as a direct indicator of whether the organization is fulfilling its **duty to respond with seriousness and integrity**.
- **Staff training completion:** The organization shall track the completion rate, timeliness, and scope of mandatory human rights training for all relevant personnel, including employees, contractors, consultants, managers, and senior leadership where applicable. Training shall be assessed not solely by attendance, but by comprehension, retention, and practical application. Completion data shall be disaggregated by department, function, and level of responsibility in order to identify gaps in institutional readiness. **Training must be continuous, role-specific, and outcome-oriented**, ensuring that personnel understand both the legal framework and the ethical standards governing their conduct. Where training completion falls below required thresholds, the organization shall implement immediate corrective action and reserve the right to restrict duties where necessary to reduce risk.

### **2. Annual Reporting**

The organization shall publish an **annual transparency report** summarizing its human rights performance, key risks, material incidents, remediation measures, and progress against established KPIs. The report shall be prepared in a manner that is **accurate, complete, and sufficiently detailed to permit meaningful external scrutiny**, while also respecting lawful confidentiality obligations and the legitimate protection of sensitive information.

The annual report shall, at a minimum, disclose the organization's principal human rights commitments, the methodologies used for monitoring, the number and categories of reported violations or concerns, the outcomes of investigations, the status and effectiveness of remediation actions, training completion metrics, and any significant changes in policy, governance, or operational controls. Where adverse trends, repeated incidents, or high-risk areas are identified, the report shall address them candidly and with sufficient specificity to demonstrate that the organization is not concealing weakness but **confronting it with institutional discipline and moral seriousness**.

Annual reporting shall be viewed as a core mechanism of accountability rather than a public relations exercise. The report must therefore reflect **substantive transparency, not selective disclosure**. It shall communicate not only achievements, but also unresolved challenges, limitations, corrective priorities, and future commitments. Any omission or distortion that would materially misrepresent the organization's human rights performance is prohibited.

### **3. External Audit**

A **third-party human rights audit shall be conducted every two years** by an independent and qualified external reviewer with relevant expertise in human rights due diligence, compliance systems, investigation standards, and organizational accountability. The purpose of the audit is to provide an impartial assessment of whether the organization's policies, practices, controls, and remediation mechanisms are functioning effectively in both design and implementation.

The external audit shall evaluate, at a minimum, the adequacy of reporting channels, the responsiveness of investigations, the reliability of KPI data, the timeliness and quality of remediation, the effectiveness of staff training, the robustness of governance oversight, and the extent to which organizational conduct aligns with stated human rights commitments. The auditor shall be granted sufficient access to documentation, personnel, and records necessary to conduct a meaningful review, subject to lawful safeguards and confidentiality protections.

The organization shall treat external audit findings as binding corrective intelligence requiring formal management response. All material findings, recommendations, and required action items shall be recorded, assigned, tracked to completion, and reviewed by appropriate leadership. Where serious deficiencies are identified, the organization shall implement immediate corrective measures and, where warranted, commission earlier follow-up review. **Independent audit is not a ceremonial requirement; it is a non-negotiable safeguard against institutional drift, self-exoneration, and unchecked risk.**

### **4. Governance, Escalation, and Recordkeeping**

Monitoring and reporting shall be supported by clear internal governance, including designated accountability for data collection, review, escalation, and oversight. Senior leadership shall receive regular summaries of human rights performance and shall be responsible for ensuring that material risks are addressed without delay. Significant violations, recurring non-compliance, or failures of remediation shall be escalated through formal management and, where appropriate, board-level channels.

All monitoring outputs, reports, audit findings, corrective action plans, and closure records shall be retained in accordance with applicable retention requirements and internal controls. Records shall be maintained in a manner that preserves integrity, confidentiality, and traceability. **Incomplete records, retrospective reconstruction without evidentiary basis, or informal handling of serious incidents shall not satisfy this requirement.**

## **5. Continuous Improvement**

The organization shall use monitoring and reporting data to drive **continuous improvement**, not merely compliance documentation. Trends identified through KPIs, annual reporting, complaints handling, and external audit results shall inform policy revision, training enhancement, operational redesign, leadership intervention, and, where necessary, disciplinary or contractual action. Where systemic weakness is identified, the organization shall adopt a corrective posture that is both immediate and structural, ensuring that lessons learned are translated into durable institutional change.

In all circumstances, **ASYLUM RESEARCH & GLOBAL ASSISTANCE** shall uphold the principle that transparency, accountability, and remediation are not optional administrative preferences, but essential obligations of a responsible organization committed to the **highest standards of human rights integrity**.

**Signed by:**

A handwritten signature in blue ink, appearing to be 'SK', written in a cursive style.

**Sergei Khrabrykh**

*President, Asylum Research & Global Assistance*

Date: 18 January 2024