

Community Accountability Reporting Mechanism (CARM) Policy

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Responsible Team:	Technical Support, Evidence and Program Quality (TEQ)				
Supersedes:	CARM Policy 1.1				
Policy Type:	Tier 2	Policy Number:	POL-1002		

 POLICY

1. Purpose

Prosper Global helps underserved people impacted by conflict, climate change, and economic hardship emerge from crisis to cope, adapt, and thrive. Achieving that vision requires communities to have genuine power in decisions that affect them, which is why accountability sits at the heart of our commitments to being Locally Led and Safe, Diverse and Inclusive.

Community Accountability Reporting Mechanisms (CARM) is part of Prosper Global' [Accountability to Affected People \(AAP\) Framework](#), which sets out Prosper Global' intention to take account of, give account to and be held to account by the communities it supports. Through the AAP Framework, Prosper Global operationalizes community engagement, which is a core component across the frameworks set out by the [Inter-Agency Standing Committee](#) (IASC), [the Grand Bargain](#), and [the Core Humanitarian Standard](#), all of which Prosper Global is a signatory to. Community engagement ensures that people impacted by crisis have a meaningful say in decisions that affect them, access to clear and timely information, and safe, accessible channels to share feedback that informs decision making in real time.

This policy sets out five minimum standards: two at [portfolio level](#) and three at [program level](#). The program level standards are shared within Prosper Global' [Program Management Policy](#), where they sit alongside other delivery standards across the program lifecycle.

1. [A CARM lead role is appointed to coordinate CARM across the portfolio](#)
2. [A CARM Standard Operating Procedure \(SOP\), is developed by the CARM lead](#)
3. [Program budget is allocated to community accountability](#)
4. [Each program must have a CARM Plan](#)
5. [CARM systems must utilize the ZenDesk platform](#)

Each standard applies at the level for which it is designed: [portfolio standards](#) apply across the relevant portfolio, and [program standards](#) apply to individual [programs, projects, and programmatic service provisions](#). Together, they help Prosper Global build and maintain safe, trusted, community-focused mechanisms that collect feedback and respond in a timely, safe, and transparent way.

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

2. Scope and Application

This policy applies to:

- Prosper Global, Prosper Global Europe, Prosper Global Netherlands, and their subsidiaries and affiliate organizations (collectively "Prosper Global");
- All board members, officers, management, team members, seconded employees, interns, and volunteers (collectively "Team Members")

The standards in this policy apply to all initiatives¹:

1. **Portfolio level (e.g. Country Office):** Portfolio standards must be applied to ensure that portfolio level CARM systems are appropriately designed, resourced and managed.

¹ Please see the [Initiative Classification Guidance \(Program, Project, Service Provision, or Portfolio\)](#) for more detail

2. **Program level:** Program standards must be applied to ensure that a consistent and governed approach to CARM is applied across all programs within the portfolio. This includes working with partners, see 2.1 Working in Consortia and/or with partners.
3. **Project Level:** Program CARM standards apply to all projects and any other programmatic service provisions that involve direct interaction between Prosper Global staff and communities or participants (see 2.2 Who can Use CARM). Any projects or service provisions that don't involve interaction with direct participants do not need to apply this policy.
4. **Acute emergency / humanitarian settings (program emergency / humanitarian response intended to be less than 6 months in duration):** Vulnerable communities in emergency crises often have the least power to influence decisions that affect them, making accessible feedback mechanisms essential to ensure their voices shape programs. All program CARM Policy standards continue to apply, with the approach adapted to context and supported by tools designed to be appropriate and accessible across acute emergency and humanitarian settings.

2.1 Working in Consortia and/or with Partners

The CARM Policy applies regardless of whether Prosper Global leads a program as the prime organization or supports it as a sub-recipient:

1. **When Prosper Global is leading a program or acting as a prime (issues subgrants to other entities),** where a subrecipient has an existing complaints and response mechanism, this may be used provided it meets the minimum requirements set out in the [CARM with Partners Checklist](#). Alternatively, sub-recipients may adopt Prosper Global CARM system, either in full or in part, to meet their obligations. Clauses committing subrecipients to our CARM Policy or the equivalent must be included in subaward agreements, and subrecipients must understand and agree to comply with all terms.
2. **When Prosper Global acts as a subrecipient,** the program must still comply with this CARM Policy and associated minimum standards. Where Prosper Global is obliged to use the prime partner's CARM system, it must be deemed substantially equivalent utilizing the [CARM with Partners Checklist](#). If any standards cannot be met, a documented waiver must clearly explain which standards are not applicable and why (See [2.4 Policy Waivers](#)).

3. Contracted Parties:

(Including consultants, suppliers and contractors) are not expected to develop their own CARM policies, processes, or meet all the standards outlined in this policy. However, contracted parties who interact directly with participants should be orientated on the relevant Prosper Global CARM system or sub-recipient system, and are responsible for advertising CARM Channels, documenting and referring any feedback they receive directly to their relevant Prosper Global or sub-recipient CARM system, or Integrity Hotline in line with Prosper Global [Code of Ethics](#).

2.2 Who can use CARM?

CARM is accessible to anyone who interacts with or is affected by Prosper Global' programs and activities. This includes direct and indirect participants, community members, partners, sub-recipients, and any other individuals or groups present in our program areas or acting on our behalf.

While CARM welcomes feedback from all the above groups, it is designed primarily with direct and indirect participants in mind, recognizing that they are most affected by Prosper Global' programs and therefore most likely to have feedback that contributes to shaping program delivery.

Within this Policy, the term **Participants** will be used to refer to both direct and indirect participants.

2.3 What counts as feedback?

CARM seeks to collect all types of feedback. For this policy, **feedback** refers to any information shared by community members and broader stakeholders. This includes complaints, concerns, questions, suggestions, beliefs, perceptions, misinformation and expressions of appreciation, whether actively requested by Prosper Global (i.e. solicited) or shared proactively (i.e. unsolicited). Feedback may relate to program quality, staff behavior, unintended harm, potential ethical misconduct, or broader community needs, priorities and suggestions. It could also include feedback not meant for Prosper Global, which will be passed on or referred to other relevant organizations or services.

2.4 Policy Waivers

The default should always be that the minimum standards in this policy will be followed, and that *how* a standard will be met is unique to each initiative and operating context. However, there may be circumstances where a waiver(s) to a specific standard is appropriate. While portfolio and program teams are encouraged to meet the standards in the manner that is most appropriate for the operating contexts, exemptions can be approved when clearly justified. Waiver(s) to a specific minimum standard in this policy will be addressed on a

case-by-case basis. To obtain an exception to a specific minimum standard you must submit a waiver request utilizing the [Waiver Request Form](#).

3. The CARM Minimum Standards

Portfolio CARM Standards

Portfolio-level CARM standards ensure that adequate resources and processes are in place beyond individual programs, project and service provisions to effectively receive, manage, and utilize community feedback across the entire portfolio. Establishing minimum standards at this level promotes efficiency, encourages learning, reduces costs, and lessens the operational burden on individual programs and projects.

CARM Standard 1: A CARM lead role is appointed by the Country Director, or equivalent, to coordinate CARM across the portfolio.

Output 1: A named CARM lead with either a Position Description (PD) or Terms of Reference (ToR) (if CARM is not included in an existing PD) defining their portfolio-wide CARM responsibilities is in place.

CARM Standard 2: A Portfolio CARM Standard Operating Procedure (SOP) defining how the CARM system operates across the entire portfolio is developed by the CARM Lead, approved by the Country Director (or equivalent) and operationalized in the CARM Zendesk Platform.

Output 2: The Portfolio CARM SOP is reviewed annually or when significant programmatic changes are made².

Program CARM Standards

Program level CARM standards define the minimum requirements for implementing CARM within individual programs. These standards ensure that each initiative establishes clear feedback channels, escalation procedures, and data protection measures tailored to its context, while remaining aligned with portfolio-level expectations.

² Significant changes can include, addition of a new feedback channel, change in CARM roles & responsibilities and/or access permissions. A full list of significant changes is available in the guidance note for this standard.

Program Design Minimum Standards

CARM Standard 3: The Program Design package includes a fully costed program budget that incorporates CARM.

Program Output 3: Budget allocated specifically to community accountability, including CARM staffing and deliverables, with these costs clearly detailed in a budget narrative.

Program Planning Minimum Standards

CARM Standard 4: Each program must have a Community Accountability Reporting Mechanism (CARM) Plan that operationalizes the portfolio CARM Standard Operating Procedure (SOP). Where a portfolio CARM SOP does not exist, the program must develop a Program CARM SOP.

Program Output 4: A Program CARM Plan or SOP, approved by the CARM Lead, Program Manager (PM), and Director of Programs (or equivalent), is completed and operationalized in the CARM Zendesk Platform.

Program Implementation Minimum Standards

CARM Standard 5³: CARM systems must utilize the ZenDesk platform to document, manage and analyze feedback received through a minimum of three feedback channels.

Program Output 5: The CARM ZenDesk platform is actively maintained, ensuring consistent documentation, case management, and analysis in line with the Program CARM Plan and Portfolio CARM SOP.

³ Partners are not expected to use the Zendesk Platform but must have in place a mechanism in which to log and manage feedback. This standard is only applicable where the CARM Zendesk platform has been formally rolled out.

4. CARM Minimum Standards Matrix

The matrix below provides an overview of the CARM standards and required outputs, in alignment with associated guidance and tools, and defined roles and responsibilities.

CARM Minimum Standards	Required Outputs	Guidance	Roles / Responsibilities
Portfolio			
Standard 1: A CARM lead role is appointed to coordinate CARM implementation across a portfolio.	A CARM Lead is appointed to coordinate CARM across the portfolio	CARM Minimum Standard 1 Guidance Note: CARM Lead	Accountable: Deputy Regional Directors Responsible: Country Directors (or equivalent) / Head of Portfolio
Standard 2: Each portfolio develops and maintains a Portfolio CARM SOP that defines how CARM systems operate across the entire portfolio	A Portfolio CARM SOP is approved and operationalized with annual approval by Country Director or Equivalent	CARM Minimum Standard 2 Guidance Note: Portfolio SOP	Accountable: Country Directors (or equivalent) / Head of Portfolio Responsible: CARM Lead
Program Design			
Standard 3 (PM standard 3): The Program Design package includes a fully costed program budget	Budget allocated specifically to community accountability, including CARM staffing and deliverables, with these costs clearly detailed in a budget narrative	CARM Minimum Standard 3 Guidance Note (PM3): CARM Budget	Accountable: Proposal Lead, Budget Lead, Country Director Responsible: CARM Lead on the Proposal
Program Planning			
Standard 4 (PM standard 6): Each program must have a CARM plan that operationalizes the Portfolio CARM SoP. Where a Country CARM SoP does not exist, the program must develop a program-level CARM SoP	A Program CARM Plan is approved and operationalized	CARM Minimum Standard 4 Guidance Note (PM6): Program CARM Plan	Accountable: Director of Programs, Program Manager, or Chief of Party

			Responsible: Program CARM Lead, Portfolio CARM Lead
Program Implementation			
Standard 5 (PM standard 12): CARM systems must utilize the ZenDesk platform to document, manage and analyze feedback received through a minimum of three feedback channels	The CARM ZenDesk Platform is actively maintained in line with the CARM Plan and SOP	CARM Minimum Standard 5 Guidance Note (PM12): CARM Database	Accountable: Director of Programs, Program Manager, or Chief of Party Responsible: Program CARM Lead, Portfolio CARM Lead

5. Roles and Responsibilities

Implementing the CARM Policy requires involvement from both CARM-specific roles and other team members across all levels. Section 5 sets out two key roles: Accountable and Responsible.

- 1. Accountable** means answerable for ensuring a CARM standard is met. Accountability sits at two levels:
 - Portfolio level** (country or regional program portfolio): Country Directors, Deputy Country Directors, and/or Directors of Programs hold accountability, which extends upward to Regional Directors and Deputy Regional Directors.
 - Program level** (individual programs): Program Managers, Directors of Programs, or Chiefs of Party hold accountability, which extends upward to Country Directors, Deputy Country Directors, and/or Directors of Programs.
- 2. Responsible** means carrying out the work of implementing a CARM standard. Responsible parties lead the design, quality assurance, and day-to-day execution of CARM standards. Responsibility typically sits with:
 - CARM-specific roles:** Staff whose primary function is CARM, such as CARM Leads and CARM Officers.
 - Roles with CARM responsibilities:** Staff whose broader role includes CARM implementation, such as MEL or program staff with designated CARM duties.

For regional or HQ-managed programs, equivalent team members apply at each level.

Whilst CARM roles lead on the implementation of CARM standards, many activities cannot be delivered by CARM staff alone. Effective CARM implementation relies on the active support and involvement of non-CARM staff across programs.

6. Related Policies, Procedures and Guidance

- a. Related Policies & Guidance – Internal to Prosper Global:
- i. [Program Management Policy](#)
 - ii. [Program Management Toolkit](#)
 - iii. [Accountability to Affected People Framework](#)
 - iv. [PM@MC Hub Page](#)
 - v. [Program Management Collection in the Digital Library](#)
 - vi. [Safeguarding Core Standards Policy](#)
 - vii. [Record Retention Policy version 1.1 \(January 1, 2022\)](#)
 - viii. [Program Data Strategy](#)
 - ix. [Gender Equality & Social Inclusion \(GESI\) Integration Toolkit](#)
 - x. [Safe Diverse & Inclusive Commitment Page](#)

CARM Guidance to accompany this Policy and can be found in the [CARM Toolkit](#), [the Community Accountability Communications Site](#), and the [CARM Digital Library page](#).

7. Definitions and Acronyms

Accountability to Affected Populations (AAP)	Accountability to Affected Populations (AAP) at Prosper Global is our commitment to use power responsibly in our relationships with the communities we serve. It means ensuring people impacted by crisis have a voice in decisions that affect them, access to clear and timely information, and safe mechanisms to provide feedback.
Community Accountability Reporting Mechanism (CARM)	A collection of at least three channels through which any community member can safely, confidentially, and accessibly share feedback at the program and project level. CARM enables Prosper Global to respond appropriately and make necessary programmatic or safeguarding adaptations, ensuring the safety, security, and empowerment of program

	participants. Using multiple channels ensures that different groups within a community can access the mechanism in the way that works best for them.
Community Accountability Reporting Mechanism (CARM) Systems	The overarching structure through which multiple CARMs are managed, monitored, and supported at the portfolio level. A CARM System ensures consistency in how feedback is collected, handled, and acted upon across programs within a country or region, enabling collective analysis of community insights, identification of trends, and portfolio-level accountability and learning.
Diverse Communities / Individuals	Groups of people who differ across a range of characteristics including gender, age, ethnicity, religion, Nationality, disability, language, socioeconomic status, and other identity factors. Diversity acknowledges that communities are not homogenous and that different people will have different needs, experiences, and perspectives that should be reflected in Prosper Global initiatives.
Marginalized Communities / Individuals	Groups of people who face systemic barriers (legal, social, economic, political) to participation, resources, and decision-making due to their identity or circumstances. This may include women and girls, people with disabilities, ethnic or religious minorities, displaced populations, and others who are structurally excluded or underserved. Marginalization is not incidental, it is rooted in unequal power dynamics, discrimination, and social norms that limit certain groups' ability to access services or have their voices heard.
Program Lifecycle	A map of a program from beginning to end. The program lifecycle consists of four phases: Program Design, Program Planning, Program Implementation, and Program Closure.
Safeguarding	Our responsibility to ensure that our program activities, team members, and partners do not commit abuse, exploitation, or harassment; specifically, that they adhere to Prosper Global' Sexual Exploitation and Abuse of Participants and

	Community Members, Child Safeguarding, Sexual Misconduct, and Anti-Trafficking and Exploitation Policies.
Sensitive Feedback/Sensitive Concerns	Sensitive feedback refers to any feedback that involves allegations, disclosures, or indicators of harm, risk, or misconduct and therefore requires heightened confidentiality, restricted access, and specialized handling. Sensitive feedback is graded as 5 or 6 in our CARM systems. This includes, but is not limited to: • safeguarding concerns (including sexual exploitation, abuse and harassment; child abuse; sexual misconduct; trafficking and exploitation); • protection risks or threats to the safety, rights, or dignity of individuals or communities; • fraud, corruption, financial misconduct, or other serious ethical violations; and • any other feedback that a participant or community member identifies as sensitive or unsafe to share through standard, nonconfidential channels.
Survivor Centered	A Survivor-Centered Approach respects and upholds the dignity, needs, safety and confidentiality of the survivor and ensures survivors are offered the support they need. A survivor's wishes, needs and perspective are considered at all times.

8. Policy Governance

Responsible Team	Technical Support, Evidence & Program Quality		
Policy Owner	Vice President of Technical Support, Evidence and Program Quality		
Policy Approver	Executive Leadership Team (in association with the Program Management Policy)	Date Approved	12 Jan 26
Last Reviewed	27 Jul 26		
Next Formal Review Date	27 Jul 28		