



**Written Submission ahead of the Regional Review of the  
Global Compact for Safe, Orderly and Regular Migration  
(GCM) in the UNECE region:**

**Implementation of the GCM in the European Union**

**October 2020**

Although the European Union is not itself a signatory to the [Global Compact for Safe, Orderly and Regular Migration](#), (GCM), it was involved in the negotiations, and 18 out of 27 EU member states are signatories<sup>1</sup>. Therefore, it seems imperative that regional level policies on migration and asylum would support – or at the very least not contradict – the objectives to which two thirds of EU member states are committed.

EU policies and regional dynamics have a distinct impact on national policies and practices throughout the region. Therefore, for the purposes of this regional review, PICUM's submission focuses on an analysis of the regional multi-annual strategy published by the European Commission on 23 September 2020, the new EU Pact [on Migration and Asylum, and in particular, concerns on how the proposals contained therein might directly contradict GCM objectives](#)<sup>2</sup>. This analysis also looks at a number of other relevant strategies which have been adopted by the new European Commission in 2020, and which will determine the EU and member states actions in the respective policy areas in the upcoming years.

This analysis follows the structure of the [GCM](#), with each section analysing a different objective.

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<sup>1</sup> Three EU Member States voted against the GCM (Czech Republic, Hungary and Poland), five abstained (Austria, Bulgaria, Italy, Latvia and Romania) and Slovakia did not attend this UN General Assembly meeting.

<sup>2</sup> The legislative proposals will be discussed by the European Parliament and the Council in the upcoming months. The [European Commission](#) aims at reaching a political agreement by the end of the year and adopt the proposed regulations by the second quarter of 2021.

### **Objective 3. Provide accurate and timely information at all stages of migration**

With the adoption of the [Global Compact for Safe, Orderly and Regular Migration](#), governments committed in Objective 3(d) to “Provide newly arrived migrants with targeted, gender-responsive, child-sensitive, accessible and comprehensive information and legal guidance on their rights and obligations, including on compliance with national and local laws, obtaining of work and resident permits, status adjustments, registration with authorities, access to justice to file complaints about rights violations, as well as access to basic services;”.

The new [European Pact on Migration and Asylum](#), published on 23 September 2020, seems to go in the opposite direction. The Pact proposes to introduce an external screening at borders<sup>3</sup>, whose purpose is to identify individuals, assess potential vulnerabilities or health concerns, and refer people to the border return procedures or to the asylum procedures (either in the country or at border) (Screening Procedure, art. 14). For this purpose, authorities fill in a de-briefing form, including individuals’ personal information and, when relevant, reason to apply for asylum.

The proposals do not foresee clear access to information during this procedure: information only needs to be provided “succinctly” and “as appropriate”, in writing and in a language that “is reasonably supposed” to be understood (art. 8). No right to legal aid is foreseen.

Further to this, EU Member States have the possibility to exclude NGOs from the provision of information to people in the pre-entry screening procedure (art. 8(4)). As the civic space has been increasingly shrinking in a number of Member states, with several NGOs and volunteers being [criminalized](#) for providing life-saving information, we fear that this provision may further legitimise and expand practices of criminalisation of NGO operations at external borders.

### **Objective 5: Enhance availability and flexibility of pathways for regular migration**

The Global Compact for Safe, Orderly and Regular Migration includes a clear commitment in Objective 5 to “adapt options and pathways for regular migration in a manner that facilitates labour mobility and decent work reflecting demographic and labour market realities, optimizes education opportunities, upholds the right to family life, and responds to the needs of migrants in a situation of vulnerability, with a view to expanding and diversifying availability of pathways for safe, orderly and regular migration”.

The EU Pact on Migration and Asylum includes sections on improving pathways for regular migration, both related to protection needs and labour migration. A Talent and Skills package has been [proposed](#) and a public [consultation](#) opened on next steps. The proposed “Talent Partnerships” specifically seek to create training and labour migration opportunities between specific countries, for specific occupations. However, overall, the

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<sup>3</sup> The procedure, detailed in the [Proposal for a Regulation introducing a screening of third country nationals at the external borders](#) (Screening Regulation), will apply to all third country nationals who crossed an external border in an unauthorised manner or who will be disembarked after search and rescue (SAR) operations, including people who apply for international protection (art. 3). During the screening, everyone, including children, will be automatically detained in designated facilities at or in proximity to the external borders for up to ten days, with no judicial review.

significance of labour migration for European economies and societies is not reflected in the Pact and the plans in this area are overshadowed by the focus on return.

Labour migration opportunities are clearly presented as a bargaining tool or ‘reward’ for countries that cooperate on return and readmission. This is accompanied by a mechanism in the [recently revised Visa Code](#) to restrict access to visas for nationals of countries that do not cooperate in readmission. This approach is contrary to the spirit of international cooperation in the Global Compact as per Objectives 21 and 23, and discriminates against people because of their nationality. An increase in meaningfully accessible pathways for people seeking to migrate from countries that do cooperate with the EU on readmission further remains to be seen.

Furthermore, the European Pact on Migration and Asylum also proposes the large-scale application of “seamless” [asylum and return border procedures](#).

This binary approach, which implies that everyone who is denied asylum should be immediately returned, deprives people of the possibility of accessing pathways for regularisation under other grounds according to EU Member States’ national legislation<sup>4</sup>, and removes important safeguards related to non-refoulement, [best interests of the child](#) and protection of family and private life.

Individuals in the proposed border procedures will be considered not to be formally “authorised to enter the Member State’s territory”, despite already being physically present on the territory. This makes residence permits on different human rights grounds, as existing in several Member States, *de facto* unavailable for people entering in Europe after the adoption of these proposals.

### **Objective 6: Facilitate fair and ethical recruitment and safeguard conditions that ensure decent work**

With the Global Compact for Safe, Orderly and Regular Migration, governments committed in Objective 6 to “review existing recruitment mechanisms to guarantee that they are fair and ethical, and to protect all migrant workers against all forms of exploitation and abuse in order to guarantee decent work and maximize the socioeconomic contributions of migrants in both their countries of origin and destination.”

Measures to facilitate fair and ethical recruitment and guarantee decent work receive almost no attention in the EU Pact on Migration and Asylum. There is a welcome recognition that more pathways for labour migration are needed to tackle labour exploitation, and invitation to share ideas on how to protect labour migrants from exploitation, but no measures concretely proposed to do so despite it being such a prevalent and long-standing issue.

The European Commission commits to assess how to strengthen the effectiveness of the EU legislation requiring sanctions on employers of undocumented workers and evaluate the need for further action. It is crucial that such an assessment would consider the failures of the EU employers’ sanctions framework to reduce employment of

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<sup>4</sup> More than [half of EU member states](#) currently provide a temporary residence permit on medical grounds; at least [five countries](#) have legislation granting special permits for undocumented victims of domestic violence; and at least [eight countries](#) have regularisation mechanisms for children, young people or families.

undocumented workers and to protect even minimal labour rights of workers. Any engagement with the European Labour Authority in this matter must focus on ensuring decent work, and access to effective reporting, complaint and redress mechanisms, as required by ILO and EU laws and recommended in the GCM (Objective 6, paragraph j), which do not exacerbate vulnerabilities by entailing risks of immigration enforcement.

At the same time, there are some small signs of potential positive developments in the area of labor migration coming from other EU policy areas:

- EU Commissioner for Justice, Didier Reynders, announced [in April 2020](#) plans to develop a legislative initiative on mandatory human rights and environmental due diligence obligations for EU companies in early 2021, which will include liability and enforcement mechanisms and access to remedy provisions for victims of corporate abuse.
- The EU's "[A Farm to Fork Strategy: for a fair, healthy and environmentally-friendly food system](#)" published in May 2020, recognises the importance of workers' social protection, working and housing conditions, as well as protection of health and safety, in building fair, strong and sustainable food systems. There are, nevertheless, concerns over the [lack of specific actions](#) in the draft action plan to realise these goals. The strategy overall sets out to build a food chain that works for consumers, producers, climate and the environment, but not workers. Integrating efforts to ensure decent work into the existing actions must be a priority. A significant action in this area would be to make EU subsidies to farmers conditional on ensuring respect for applicable labour standards. There are environmental conditionalities on receiving the EU funds, but no requirements regarding labour rights. The Common Agricultural Policy (CAP) is currently being revised, and the European Parliament [voted on 23 October 2020](#) to include social conditionality in CAP payments. However, this will be subject to negotiations with the European Council.
- [Council Conclusions on improving the working and living conditions of seasonal and other mobile workers](#) (9 October 2020) invite EU "member states to explore the possibility of setting specific requirements for temporary work and recruitment agencies, so as to ensure that they respect minimum quality standards according to national and EU legislation and, where appropriate, collective agreements". In addition to looking into national level requirements, action to regulate recruitment agencies at regional level would have added value and support member states to meet their GCM objectives.

### **Objective 7: Address and reduce vulnerabilities in migration**

With the Global Compact for Safe, Orderly and Regular Migration, governments committed in Objective 7 to "respond to the needs of migrants who face situations of vulnerability, which may arise from the circumstances in which they travel or the conditions they face in countries of origin, transit or destination, by assisting them and protecting their human rights, in accordance with our obligations under international human rights law"; and to "uphold the best interests of the child at all times, as a primary condition in situations

where children are concerned, and to apply a gender-responsive approach in addressing vulnerabilities, including in response to mixed movements.”

Notwithstanding concerning aspects of the EU Pact on Migration and Asylum set out elsewhere in this submission that risk increasing migrants’ vulnerability to harm, including through the increased use of immigration detention, the EU has nonetheless taken positive steps in the area of migrants’ rights as victims of crime.

In June 2020, the EU adopted its first [Strategy on victims’ rights \(2020-2025\)](#), which explicitly recognises that people who are undocumented and who become victims of crime “are also often in a situation of vulnerability and may have difficulty to access justice.” Based on the rights established in the [2012 EU Victims’ Rights Directive](#) for all victims of crime, regardless of status, the European Commission commits to assessing available EU policy tools to “improve reporting of crime and access to support services for migrant victims, independently of their residence status”, and promote exchange of good practices among member states aimed at ensuring that victims who come forward to report crime are not faced with potential immigration enforcement measures. The Strategy also notes the vulnerability of victims of crime committed in detention and the need to establish protocols and oversight. Through a newly established multi-stakeholder Platform, the EU will work to ensure implementation of the Strategy in collaboration with various actors, including migrants’ rights organisations.

In March 2020, the EU also adopted a [Gender Equality Strategy](#) that takes an explicitly intersectional approach and that includes among its priorities tackling violence against women. To this end, it calls for disaggregated data and relevant indicators that can shed light on the incidence of gender-based violence based on intersectional factors, including migration status. It also notes the barriers faced by women in accessing the labour market, often due to the “intersection of gender with additional conditions of vulnerability or marginalisation such as belonging to an ethnic or religious minority or having a migrant background.” That being said, the Gender Equality Strategy proposes few initiatives to remedy the economic and other structural inequalities experienced by migrant women.

In addition to Objective 7, these new EU strategies on gender and victims of crime are also relevant to other objectives of the GCM, including on facilitating fair and ethical recruitment and safeguarding conditions that ensure decent work (Objective 6); preventing, combatting and eradicating human trafficking (Objective 10); and indeed to the broader theme of “safety” in the Compact. While these EU strategies reflect positive steps and important recognition of the rights of undocumented people, it will be important to monitor their implementation, which will be challenged by the dominant theme of enhanced immigration enforcement in EU policy.

### **Objective 8: Save lives and establish coordinated international efforts on missing migrants**

With the Global Compact for Safe, Orderly and Regular Migration, governments committed in Objective 8(a) to “ensure that the provision of assistance of an exclusively humanitarian nature for migrants is not considered unlawful”. Furthermore, Objective 9(c) includes a commitment to “ensuring that counter-smuggling measures are in full respect for human rights”.

However, the new [Commission Guidance](#) on the implementation of EU rules on definition and prevention of the facilitation of unauthorised entry, transit and residence - which was released as part of the new EU Pact on Migration and Asylum - only invites EU member states not to criminalise acts which are “mandated by law.” Acts which are “mandated by law” are very different from acts which are “permitted by law”. Activities such as providing food, shelter, car lifts or information all remain excluded, in particular when they are not carried out by an official NGO which is “mandated” to carry out such activities. The almost exclusive focus on search and rescue also risks leaving out activities at land and activities which are not directly life-saving.

Furthermore, search and rescue operations are only considered legitimate when they “observe the instructions received from the coordinating authority” and while “complying with the relevant legal framework”, which leaves the door open to prosecution of NGOs under (often trumped-up) accusations of breaching national legislation or instructions on disembarkation. This risks further exacerbating a trend of criminalisation of humanitarian assistance in the EU, with [research](#) showing that at least 171 people have been criminalised for providing humanitarian assistance to migrants and refugees in the EU in the past five years.

#### **Objective 10: Prevent, combat and eradicate trafficking in persons in the context of international migration**

With the Global Compact for Safe, Orderly and Regular Migration, governments committed in objective 10 to “take legislative or other measures to prevent, combat and eradicate trafficking in persons in the context of international migration” and to “enhance the identification and protection of, and assistance to, migrants who have become victims of trafficking, paying particular attention to women and children”.

However, several measures in the EU Pact on Migration and Asylum may instead [increase the risks of exploitation and human trafficking, as well as violations of exploited and trafficked persons’ rights](#).

The Pact’s proposal for a [pre-entry screening procedure](#), to identify people and decide which subsequent procedure is applicable, does not provide adequate safeguards for trafficked persons. It is supposed to include a preliminary medical examination and screening for vulnerabilities, but these are not compulsory, as they will only take place when considered “relevant” by the authorities. Therefore, this screening risks to miss identifying many vulnerabilities, including signs of trafficking. People will not have access to a lawyer, and the involvement of national rapporteurs on trafficking is also optional, to situations that the authorities deem appropriate. During the pre-entry screening procedure, people will be automatically detained for up to ten days. This raises clear risks that safeguards will not be put in place and will be inadequate. There is also no clear obligation to act upon vulnerabilities identified nor refer people into National Referral Mechanisms.

The Pact’s proposed [asylum and return border procedures](#) are also expected to lead to increased and extended detention periods, during which there is limited access to information and medical care. Detention makes it difficult for people who have been trafficked to disclose their experiences; to access specialist, independent trafficking

advice and representation; or to be correctly identified as victims and given specialist support. Often, victims of human trafficking or other forms of severe exploitation are wrongly convicted of criminal offences relating to their exploitation. Detention causes harm and can trigger past trauma. Moreover, by denying victims of trafficking a safe space where they can disclose their experiences and access independent advice detention prevents effective access to National Referral Mechanisms.

The sustained and increased investment of political attention and resources in forced returns will also continue to negatively impact on trafficked persons and increase risks of re-trafficking, particularly when procedural safeguards are limited. Many (presumed) trafficked persons are currently deported to other EU countries or their countries of origin, when they have not been able or willing to cooperate with the authorities or not been identified as trafficked persons. This denies them access to their rights as victims of trafficking, as well as posing risks of non-refoulement and other human rights violations.

### **Objective 13: Use migration detention only as a measure of last resort and work towards alternatives**

With the Global Compact for Safe, Orderly and Regular Migration, governments committed in objective 13 to “to prioritize non-custodial alternatives to detention that are in line with international law, and to take a human rights-based approach to any detention of migrants, using detention as a measure of last resort only “In objective 13 (h), governments also committed to “Protect and respect the rights and best interests of the child at all times, regardless of migration status, by ensuring availability and accessibility of a viable range of alternatives to detention in non-custodial contexts, favouring community based care arrangements, that ensure access to education and health care, and respect the right to family life and family unity, and by working to end the practice of child detention in the context of international migration.”

Again, this commitment seems not to be upheld in the EU Pact on Migration and Asylum, which will likely lead to increased and longer detention, including for children.

During the [pre-entry screening](#), everyone crossing an external border irregularly, or disembarked after search and rescue (SAR) operations, will be automatically detained in designated facilities for up to ten days. During this time, access to information and to medical care will be severely curtailed. After this period, people will be channelled into the return or asylum procedures, which, for the majority of people, will take place in the same border facilities. The same screening procedures will also apply to people already on the EU territory, independent of how long they have been living in Europe, if there is no indication that they have entered regularly. In this case, people can be detained in specialised facilities for up to three days.

For the whole duration of the asylum and return border procedures, which can last up to six or even ten months in cases of ["exceptional mass influx" or risk of it](#), detention will be the norm. In clear violation of [international principles](#) of necessity and proportionality, the Pact permits continued detention for the whole duration of the asylum and return border procedures, with no reference to the obligation to prioritise alternatives to detention.

Children who are under 12 are exempt from these procedures, as well as children who are unaccompanied. However, children aged 12-18 who are accompanied by their parents or

other caregivers are required to undertake the border procedures, which translate into almost automatic detention and lack of access to regular pathways beyond asylum.

Despite the [internationally](#) recognized definition of children being every person until the age of eighteen, this proposal draws a new line in the middle of adolescence, imposing the new regime on children above the age of 11, and allowing their detention – for potentially up to 10 months, as far as they are with their family. This provision, as well as the possibility to still detain younger children and unaccompanied children for national security reasons, infringes international and regional [standards](#) that clearly consider child immigration detention as a violation of the rights of the child.

Alternatives to detention are almost absent in the Pact, with the term appearing only once in the whole package, in a non-normative section which applies only to children. This absence disregards the increasing [evidence](#) on the effectiveness of community-based alternatives to detention, as well as previous [recommendations](#) by the European Commission to support and expand alternatives. In particular, the independent [evaluation](#) of two-year engagement-based alternative to immigration detention pilot projects in Bulgaria, Cyprus and Poland demonstrated that [case management](#) has a positive impact on individuals' ability and capacity to work towards case resolution and can help them to stay engaged in migration processes. Of the more than 120 individuals who benefitted from case management, 99% reported improved ability to participate in informed decision making and 96% had improved ability to engage with the immigration procedures over time.

These pilots are part of the [European Alternatives to Detention Network](#), a group of European NGOs which aims to reduce and end immigration detention by building evidence and momentum on engagement-based alternatives. The Network brings together NGOs running case management-based alternative to detention pilot projects in seven European countries (Belgium, Bulgaria, Cyprus, Poland, the UK, Italy, and Greece) with regional-level organisations ([IDC](#) and [PICUM](#)). The Network was founded in 2017 to address the fact that, despite a growing body of international research, best practice and evidence, showing that the most effective alternatives to detention are those that engage with and support migrants to resolve their cases in the community, there has been little development of engagement-based alternatives in Europe. The purpose of the Network is therefore to fill a gap in knowledge about factors that contribute to alternative to detention effectiveness with a goal to inform and inspire the development and expansion of further alternatives and reduce and ultimately end immigration detention.

### **Objective 16: Empower migrants and societies to realize full inclusion and social cohesion**

Under the Global Compact for Safe, Orderly and Regular Migration, governments committed in Objective 16 to “empower migrants and societies to realize full inclusion and social cohesion”.

The new EU Pact on Migration and Asylum addresses this objective by including a chapter on “supporting integration for more inclusive societies”. With this, the EU recognises the importance of integration, by stating that ‘successful integration benefits both the individuals concerned, and the local communities into which they integrate; it fosters social cohesion and economic dynamism; it sets positive examples for how Europe can manage

the impacts of migration and diversity by building open and resilient societies'. It also reflects on the huge existing gaps in unemployment, lack of educational or training opportunities and limited social interaction between countries and "host country nationals".

The European Commission plans to adopt a comprehensive Action Plan on Integration and Inclusion for 2021-2024 by the end of 2020, to provide strategic guidance and set out concrete actions to foster inclusion of migrants drawing on all relevant policies and tools in key areas such as social inclusion, employment, education, health, equality, culture and sport.

Despite this positive framing, the forthcoming EU Action Plan will be embedded in a legal framework which fails to address migrants' needs and sets eligibility criteria for social services based on the residence status of individuals, with the tangible risk of fragmenting communities' and families' access to services. As integration is a condition which is closely interconnected with meaningful access to services, excluding irregular migrants from the provisions on access to social services is also in open contradiction with the content of Objective 15 of the Global Compact on Migration, in which governments commit 'to ensure that all migrants, regardless of their migration status, can exercise their human rights through safe access to basic services'.

The recent socio-economic challenges triggered by the Covid-19 pandemic have highlighted how the denial of access to services – including social protection – on the basis of immigration status make whole societies more vulnerable. Nonetheless, the forthcoming EU Action Plan on Integration and Inclusion may maintain its current focus on beneficiaries of international protection, excluding from most services those who are undocumented.

#### **Objective 17: Eliminate all forms of discrimination and promote evidence-based public discourse to shape perceptions of migration**

Under Objective 17 of the Global Compact on Safe, Orderly and Regular Migration, states commit to "eliminate all forms of discrimination, condemn and counter expressions, acts and manifestations of racism, racial discrimination, violence, xenophobia and related intolerance against all migrants in conformity with international human rights law."

Nonetheless, there are fears that the new EU Pact on Migration and Asylum will result in greater discrimination against migrants. For instance, under the Pact's proposed return sponsorship program, member states have the possibility to indicate the nationality of individuals they intend to return – raising concerns about discriminatory policing and profiling of people and communities of colour. Indeed, the EU's [adoption in 2019](#) of regulations creating an interoperable system of migration databases with the potential to store hundreds of millions of personal records containing the biographic and biometric data, raised similar concerns. This web of interconnected databases is intended to facilitate the identification, apprehension and return of people irregularly present in the EU – and help in tackling "serious crimes" like terrorism. It [has been criticised](#) as deeply discriminatory in its exclusive focus on migrants, expressly mingling criminal law and immigration enforcement goals – and as likely to increase discriminatory identity checks against people of colour and minority communities.

More promisingly, in September 2020, the EU adopted an [Action Plan Against Racism](#) to address the racism that “persists in our society”. Importantly, the Action Plan recognises and addresses concerns about the “relationship between law enforcement bodies and minorities” and devotes specific attention to the problem of unlawful and discriminatory profiling. It also considers risks linked to new technology, which can drive further discrimination, raising the example of artificial intelligence (AI)-based algorithms that can lead to biased results and discrimination. The Action Plan Against Racism acknowledges that, despite these concerns, the “Commission and the agency EU-LISA are working on facial recognition technologies to be used in the EU’s own large IT systems for border management and security”. It notes that the EU will propose a legislative framework that addresses risks of bias and discrimination and that that “biometric identification and other intrusive surveillance technology could be considered among high-risk AI applications that would need to fulfil specific requirements and undergo an ex ante conformity assessment.”

The Action Plan Against Racism also addresses structural racism, acknowledging the historical roots of racism, and the need to adopt an intersectional approach to combat it effectively. It commits to mainstreaming issues of racial equality across all areas of EU policymaking – including migration – through the work of the EU’s new Equality Task Force. Deepened engagement is foreseen with different stakeholders, including civil society organisations active in the fight against racism, and a coordinator on anti-racism will be appointed to support the Action Plan’s implementation.

This strategy is very welcome, in particular its recognition of structural racism, specific attention to concerns about the role of policing and discriminatory profiling, and commitment to engage closely with affected communities and civil society. However, it remains to be seen how effective it will be in addressing the discriminatory aspects of the EU’s migration enforcement agenda.

### **Objective 21: Cooperate in facilitating safe and dignified return and readmission, as well as sustainable reintegration**

Deportation is an extreme and harmful measure that often breaks economic, social and family ties. Civil society and [researchers](#) have pointed to the concerning lack of evidence and knowledge of what happens to people after they are deported, and how the [experience of deportation](#) has an impact on the lives of parents and children, as well as future choices and opportunities.

With the Global Compact for Safe, Orderly and Regular Migration, governments committed in Objective 21 to “guarantee due process, individual assessment and effective remedy, by upholding the prohibition of collective expulsion and of returning migrants when there is a real and foreseeable risk of death, torture and other cruel, inhuman and degrading treatment or punishment, or other irreparable harm”.

Yet increasing returns, including to deter irregular migration, is presented as the overriding objective of the common framework. The term “return” appears more than 100 times in the Commission [Communication](#) on the Pact alone – while the term “rights” only 14.

The increase in returns is pushed through by the EU in several measures and initiatives:

- the reduction of procedural safeguards, such as the lack of legal aid and accessible information in the [pre-entry screening procedures](#), and limitations to the right to appeal against negative decisions;
- the creation of the “[return sponsorship](#)” scheme as a form of “solidarity” among member states, under which a state will be able to organise the deportation of an undocumented person living in another member state, rather than relocating them[2];
- [new structures](#) with dubious roles and unclear mandates: a Return Coordinator within the Commission, supported by a new High Level Network for Return; and a Frontex Deputy Executive Director on Returns;
- the renewed push towards prioritising readmission agreements in all relations with third countries with the exception of humanitarian aid.

These measures will likely lead to increased risks of human rights violations and reduced safeguards during return procedures, with increased challenges in ensuring accountability.

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