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ADRA Norway PSHEA Policy		
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ADRA Norway Protection from Sexual Harassment, Exploitation, and Abuse (PSHEA) Policy

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Definitions

ADRA representatives	This term refers to anyone who represents ADRA: All permanent, temporary, and part-time staff; board members; interns; volunteers; ADRA visitors (including media); contractors (including suppliers and vendors) and consultants; and sub-grantees (local implementing partners and service providers).
Beneficiaries	<p>In regards to safeguarding, ADRA uses a broad, working definition of 'beneficiary' to include not only direct beneficiaries of a particular project, but also any child or adult who is part of the affected population.</p> <p>Synonyms for 'beneficiary' include: project participant, affected population, population of concern, local community.</p>

	Sex with a beneficiary is considered either sexual exploitation or abuse, however the individual need not be in a vulnerable position; a differential power or trust relationship is sufficient to establish SHEA.
Safe recruitment	The purpose of safe recruitment is to help identify and deter or reject individuals who are deemed to be at risk of breaching ADRA’s policies and not adhering to its standards. The safe recruitment process begins with how jobs are advertised to how employees are inducted and trained.
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions.
Sexual Exploitation	<p>Sexual exploitation is defined as the abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the sexual exploitation of another.</p> <p>Examples of sexual exploitation include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Offering special benefits (including money, employment, goods or services) to program participants in exchange for expressed, implied or demanded sexual favors; ▪ Threats or insinuations that an individual’s refusal or unwillingness to submit to sexual advances or demands will affect the person’s entitlement to project assistance & support; ▪ Verbal conduct such as sexually derogatory remarks, graphic verbal commentaries about an individual’s body or dress, sexually degrading words used to describe an individual, sexually suggestive or obscene letters, notes, emails or invitations, demeaning or inappropriate comments, name-calling, innuendos, slurs, jokes, sexual advances or propositions; ▪ Visual conduct such as leering, sexual gestures, displaying or distributing sexually suggestive objects or pictures, cartoons, graffiti posters or magazines; or <p>Actual or threatened physical contact or conduct, such as patting, pinching, blocking movements, or any other offensive touching.</p>
Sexual Harassment	<p>Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct sexual nature, whether verbal, written or visual, by any person to another individual within the scope of ADRA’s work. This also includes an unwelcome request for sexual favors.</p> <p>Sexual harassment can take various forms. It can be obvious or indirect, physical or verbal, repeated or one-off and perpetrated by any person of</p>

any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and representatives.

Examples include: sharing of images that create an offensive or intimidating environment; downloading sexually explicit pictures from an ADRA's computer (even if not shared with others); unwanted or inappropriate touching; requests of a sexual nature made by one person to another that demand or imply a condition of employment or compensation.

ADRA prohibits sexual harassment of any individuals, employee or program participant, regardless of their work relationship.

Purpose

ADRA Norway expects that working relationships are based on mutual respect, professionalism, and are free from sexual harassment, sexual exploitation, and sexual abuse.

The purpose of this policy is to:

- State ADRA Norway's committed to the protection from and response to SHEA.
- Clarify ADRA Norway's expectations of all who represent us
- Affirm ADRA Norway's people-focused approach to responding to SHEA allegations.
- Affirm ADRA Norway's adherence to the ADRA network procedures to report and manage incidents of sexual misconduct.
- Standardize disciplinary actions for violations of this Policy.

Scope

This policy represents a localized version of the ADRA network approved policy, the Protection from Sexual Harassment, Exploitation and Abuse (PSHEA) Policy, which applies to all ADRA Representatives. The Policy applies while in and outside of the workplace during working and non-working hours every day of the year. Associating with ADRA Norway means that one must comply with ADRA's standards, even if the standards are higher than one's local context or governing laws.¹

Policy Statement

ADRA Norway believes all people have a right to live their lives free from sexual violence. ADRA recognizes that our work often puts its representatives in positions of power in

¹ These standards are listed in the ADRA Code of Conduct and the Safeguarding Code of Conduct.

relation to the communities we work with, especially vulnerable adults and children. ADRA representatives have a moral and legal obligation to use their power respectfully and must not abuse the power and influence they possess.

ADRA Norway will not tolerate its employees, volunteers, consultants, partners or any other representatives associated with the delivery of its work carrying out any form of sexual harassment, sexual abuse or sexual exploitation (SHEA).

ADRA representatives have the duty to create and maintain environments that promote the protection of those we serve and our own representatives from SHEA. It is the responsibility of all ADRA representatives to raise any concerns you have or those which are reported to you according to this policy. It is not your responsibility to investigate if sexual harassment, abuse, or exploitation has occurred.

All complaints about sexual misconduct brought to ADRA's attention will be taken seriously. ADRA will conduct rigorous and fair investigations of complaints that indicate a possible violation of this policy. Responses to SHEA allegations will be survivor-centered and consider the comprehensive needs and safety of all those involved. ADRA will not tolerate SHEA carried out by its representatives; substantiated allegations of SHEA will result in appropriate disciplinary action.

Core PSHEA Principles

ADRA Norway is in full agreement with the United Nations zero tolerance policy relating to sexual exploitation and abuse. Conduct that ADRA representatives must abide by includes:²

1. Sexual harassment, exploitation, and abuse by humanitarian workers are acts of gross misconduct and therefore are grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of consent, i.e. the local or national laws of the country you are working in. Ignorance or mistaken belief in the age of the child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by ADRA representatives is prohibited. This includes exchange of assistance that is due to beneficiaries.

² Translations of the Core PSHEA Principles can be found at <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2002>.

4. Any sexual relationships between those providing development or humanitarian assistance and protection and a person benefitting from such development or humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of aid work.³
5. When an ADRA representative develops concerns or suspicions regarding sexual harassment, exploitation, and abuse by an ADRA representative, he or she must report such concerns via established reporting procedures stated in the **ADRA Global Procedures to Receive and Report Sensitive Complaints**.⁴
6. ADRA representatives are obliged to create and maintain an environment which prevents sexual harassment, exploitation, and abuse and promotes the implementation of this policy and the Safeguarding Code of Conduct. ADRA managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

ADRA's Commitments to PSHEA

Safeguarding and PSHEA are integral part of the mission and values of the Seventh-day Adventist Church and one that is firmly rooted in ADRA's Purpose Statement to serve humanity as God intended. Therefore, ADRA Norway commits to the following measures:

1. Quality leadership to accelerate change and provide a safe working culture
2. Active prevention of sexual harassment, exploitation, and abuse (SHEA), including workplace harassment
3. Strengthened reporting procedures to enhance accountability and transparency with a zero tolerance to inaction
4. Taking a survivor-centered approach
5. Supporting partners and stakeholders on the prevention of SHEA

³ Sexual relationships between national staff from the communities where ADRA is implementing are allowed, but strongly discouraged. These relationships must be disclosed immediately or else the conduct will be considered a violation of the *Code of Ethics*'s clause on conflict of interest. Any relationship with a minor, even if locally accepted, is prohibited by ADRA. Read more in Annex I of the *Code of Conduct*.

⁴ Everyone has the right and obligation to report sexual misconduct. Anyone who witnessed but was not the target of SHEA is obligated to report in their own right. ADRA will address any complaint and concern without discrimination, even if the offense might not meet the standard for SHEA.

These five commitments are explained in detail in Annex I and II with specific requirements, particularly around recruitment⁵ and reporting. The **ADRA Safeguarding Implementation Standards**, particularly commitments one and two, serve to help operationalize these commitments and requirements in a practical manner.

Safeguarding (PSHEA) Risk Assessments

ADRA Norway exercises due diligence to identify, mitigate, and monitor risks of SHEA through a proportional risk management approach that is shown through this policy. Safeguarding risk assessments and mitigation plans for SHEA can be incorporated into pre-existing assessments, such as a security risk register or a gender analysis.

Organisational risk management: ADRA Norway conducts an annual risk assessment that identifies organisation-wide risks beyond project-specific considerations. This includes safeguarding and protection in operational areas outside any specific project.

Programmatic risk management: Each programme is required to have a documented risk assessment including considerations of risks to the safety of children involved in the programme. This assessment includes control measures that are integrated in the design of activities, budgets and reporting of the programme.

Partner assessments: All potential partners undergo child safeguarding and protection due diligence checks prior to selection. Where gaps are identified within the partner's systems an action plan should be proposed to build the partner's capacity within a given time period. This action plan should be agreed by the partner and referred to in the partnership agreement. Where partners persistently fail to meet the milestones on the action plan, ADRA Norway may consider terminating the agreement.

Reporting SHEA Concerns

ADRA Representatives who receive or have a complaint or concern related to sexual harassment, exploitation, and abuse should report it immediately and not investigate further.

Contact emergency services if someone is in imminent danger and if it will not place anyone at risk of further harm.

Otherwise, ADRA representatives should directly inform the Safeguarding and Protection focal Person, Secretary General, and their line manager if appropriate. This must occur

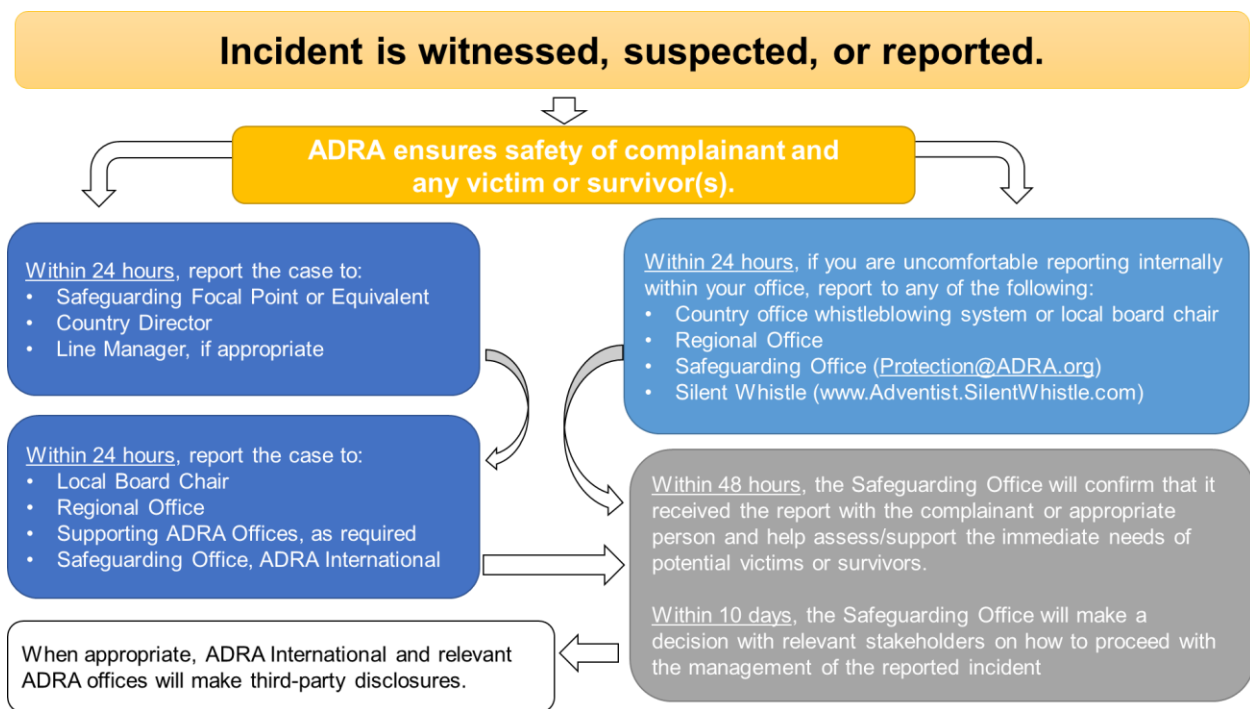
⁵ ADRA Norway's safe recruitment process is outlined in the ADRA Norway Safeguarding Policy.

within one day (24 hours) or as soon as possible if security and technology do not allow this deadline to be met.

If an ADRA Representative does not feel comfortable reporting to the Focal Person or Secretary General, they may report outside of his or her office. Alternative options include:

- ADRA Norway board chairperson
- ADRA Regional Office
- Safeguarding Office at ADRA International (Protection@ADRA.org)
- ADRA International's whistle blowing platform (www.Adventist.SilentWhistle.com)

Image: ADRA Network Reporting Flowchart for Sensitive Concerns



Responding to SHEA Concerns

Conduct that undermines the core PSHEA principles and ADRA's commitment to maintain a protective environment is prohibited under this policy. Where concerns exist about the conduct of ADRA representatives in relation to sexual misconduct, the Safeguarding Office with relevant stakeholders will decide if the complaint comes within the scope of conduct prohibited by this policy.

When appropriate, an administrative safeguarding investigation will be conducted and possible referral to statutory authorities for criminal investigation by Norwegian law

enforcement and/or the law enforcement of the country in which the alleged misconduct occurred; and/or by ADRA in accordance with disciplinary procedures.

ADRA offices are obliged to support the administrative safeguarding investigation process and any reporting requirements.

Disciplinary Consequences

Any substantiated violation of the PSHEA Policy will be considered an act of gross misconduct and cause for termination. Additionally, anyone subject to this policy who is found to have harassed, coerced, intimidated or retaliated against another in violation of this policy will be subject to prompt and appropriate disciplinary action, up to and including termination.

Implementation and Monitoring

The ADRA Norway board is ultimately accountable for this policy. The Secretary General is responsible for its implementation.

All ADRA managers are also responsible to ensure the delivery of this policy and to promote it as relevant in all aspects of their work, to hold themselves and others to account and to help create a safe environment for all.

Adherence to this policy should be guided by the **ADRA Safeguarding Framework (ASF) Implementation Standards**, where the minimum standards for safeguarding as stated in this document must be implemented.

Annex I: The ADRA Network Commitments to PSHEA

1. Quality leadership to accelerate change and provide a safe working culture

- ADRA leaders set the tone for agency culture by establishing clear expectations on appropriate conduct, modeling respectful behavior in their interactions at work, and taking measures to improve diversity, equity, and inclusion.
- ADRA leaders are responsible for creating a “speak up” culture to promote accountability and transparency.
- ADRA leaders must uphold the highest standards of professional and personal conduct and act with integrity and discretion.

2. Active prevention of sexual harassment, exploitation, and abuse (SHEA), including workplace harassment

- Each ADRA office will have a Safeguarding Policy in place that includes a strong SHEA element.
- Each ADRA office must have a Code of Conduct in place for staff and partners and include a prohibition of SHEA
- Each ADRA office has a workplace policy that promotes dignity and respect in the workplace
- Human resource policies, procedures and training must prioritize prevention and response to SHEA.
- Every ADRA office will facilitate trainings on this policy and the other ADRA Safeguarding Framework policies for inductions and at least annually as a refresher training for all staff.
- Recruitment and engagement processes reflect ADRA’s commitment to safeguarding and minimize as far as possible the risk of engaging an individual unsuitable to work with vulnerable people. *Safe recruitment requirements are included in the second annex.*
- Safeguarding will be considered a cross-cutting issue across all departments, sectors, and offices within the ADRA network.
- ADRA will prioritize partnering with organizations, engaged to increase ADRA’s impact, that have a commitment to safeguarding.

3. Strengthened reporting procedures to enhance accountability and transparency with a zero tolerance to inaction

- Every ADRA office will establish and ensure that complaint mechanisms for reporting sexual harassment, exploitation, and abuse are equitably accessible, safe and confidential--particularly to participants of ADRA programs-- and that ADRA representatives understand how to receive and refer complaints.
- ADRA has at least one person⁶trained to receive and respond to safeguarding and child protection incident reports in each office.
- ADRA has a zero tolerance to inaction and will act on every allegation in a fair and reasonable way with due regard for procedural fairness, including workplace bullying and harassment allegations.
- Swift and appropriate action will be taken against ADRA representatives who commit sexual exploitation and abuse, child abuse, and other serious forms of harassment, exploitation, and abuse.⁷
- ADRA will not tolerate any form of retaliation against people who report suspected sexual misconduct in good faith or against those who participate in administrative safeguarding investigations.
- Failure of an ADRA office to comply with the safeguarding standards or investigations, especially in actively disregarding recommendations of safeguarding investigations, will result in disciplinary action from to the removal of the ADRA license.
- All reports and allegations will be kept confidential to the maximum extent possible while using a survivor-centered approach.⁸

⁶ Ideally someone who isn't within Human Resources.

⁷ Consequences may include administrative or disciplinary action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.

⁸ Only people with a need to know can be provided information and limited to their role in the response and investigation process. Anyone who has a role as a part of the investigation or response team is bound by confidentiality and can be disciplined, up to termination, for violating that confidentiality.

- Safeguarding incidents will be disclosed internally and externally with varying amounts of information in the appropriate manner.
- ADRA reserves the right, in consultation with legal counsel, to disclose information about safeguarding incidents on record concerning an ADRA representative if requested by an ADRA office or another third party in a selection process.

4. Taking a survivor-centered approach

- Actions to address SHEA will be underpinned by a “do no harm” approach prioritizing the rights, needs, and wishes of the victim or survivor, while ensuring procedural fairness to all parties.
- Victims and survivors will be consistently treated with dignity and respect. This includes believing complainants at the first point of contact with ADRA when reporting abuse.
- Victims’ and survivors’ needs and priorities will be considered throughout and after the investigative process. ADRA will work hard to involve the survivor in decision-making when possible and appropriate.
- Anonymous reporting is allowed. To the best of our ability, ADRA will work with survivors to address their concerns around confidentiality to allow effective investigations to go forward.
- ADRA will provide basic emergency assistance (security and legal) and basic medical (emergency assistance and psychosocial) support as appropriate and feasible to complainants of sexual exploitation and abuse. ADRA will assist survivors with reporting incidents to the proper authorities should they choose to do so directly.
- The safety and security of individuals (complainant, survivor, witnesses, respondent, and investigators) involved in an administrative safeguarding investigation will be prioritized and protected by ADRA.
- ADRA will ask survivors and complainants who have received incident support for their feedback to improve ADRA’s response mechanisms.

5. Supporting partners and stakeholders on the prevention of SHEA

- ADRA will do its best to support its partners and other stakeholders it engages with, including government, business, other non-government organizations, institutions, communities and individuals, to collectively address the underlying causes of SHEA while dealing sensitively and effectively with SHEA that occurs in the course of our work.
- Partner arrangements include a plan for building safeguarding capacity and costs are included in budgets and awards.
- When possible, ADRA will participate in community-based or inter-agency complaint mechanisms that are jointly developed and implemented by the local or aid community. ADRA will promote inter-agency efforts and shared mechanisms for preventing and reporting SEAH.
- Create and maintain mechanisms to routinely educate communities ADRA serves of their rights and how to access appropriate reporting channels, as well as what happens when one reports.