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ADRA Norway Safeguarding Policy

Contents

1. Definitions
2. Purpose
3. Scope
4. Policy Statement
5. Risk Assessments
6. Reporting Concerns
7. Responding to Concerns
8. Disciplinary Consequences
9. Implementation and Monitoring
10. Annexes:
 - a. Statement of commitment to comply with the ADRA Norway Safeguarding Policy
 - b. ADRA Norway Children and Adults at Risk report
 - c. Responding to safeguarding and protection incidents procedure diagram
 - d. Safe recruitment procedures

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).
Bullying	Offensive, intimidating, malicious or insulting behavior, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Harassment	Any unwelcome or unwanted (verbal) comment or (physical) behavior that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an individual.
Local Communities	This term may be used interchangeably with affected population or beneficiaries. It refers to the people that ADRA’s implementing activities aim to support, whether or not the projects engage or affect them directly.
Safeguarding	Safeguarding at ADRA Norway means: <ol style="list-style-type: none"> 1. Providing a working environment free from abuse and harm to anyone who works with and comes into contact with ADRA representatives and ADRA projects. 2. Contributing to the protection of vulnerable people by mainstreaming protection efforts as far as possible within programs. This includes providing timely support to beneficiaries who present with protection concerns.

Purpose of the ADRA Norway Safeguarding Policy

This Policy will help uphold ADRA’s purpose statement “to serve humanity so all may live as God intended” and should be integrated across all ADRA offices in policies, practices, programs, and people.

This Safeguarding Policy outlines ADRA’s commitment to safeguard its representatives and the local communities it supports.

This Policy aims to ensure that:

- ADRA has procedures in place to promote the wellbeing to ADRA representatives and to prevent and respond to harm and abuse, including bullying and harassment, caused in the workplace
- All who represent ADRA understand, are skilled, and well supported in meeting their responsibilities to safeguard people, especially local communities, from harm and engage positively with them in ways that uphold the ADRA Code of Conduct and the ADRA Safeguarding Code of Conduct.
- Those who engage with ADRA (representatives and local communities) are aware of ADRA’s responsibilities to prevent and to respond to any misconduct against them and their rights and routes for reporting such incidents.

This Policy **does not** specifically cover fraud, project-level complaint and feedback mechanisms, or security.

Scope of the ADRA Safeguarding Policy

- This Policy applies to all ADRA representatives (see definition above).
- The Policy applies while in and outside of the workplace during working and non-working hours every day of the year.
- Associating with ADRA 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 everyone regardless of age, gender, disability, ethnic origin, or other diversities have a right to be protected from all forms of harm and abuse, including harassment, bullying, and exploitation.

ADRA Norway defines "safeguarding" as providing a working environment free from abuse and harm to anyone that works with and comes into contact with ADRA representatives and its projects. The Safeguarding Policy affirms ADRA Norway's commitment to protect its representatives and the communities it works with from the risks of violence, sexual exploitation, and all other forms of harm and abuse that we may create with our presence and activities. ADRA Norway recognizes the responsibility it holds to actively prevent and respond to protection concerns experienced by its beneficiaries. Whilst ADRA Norway and its partners may not be able to personally provide the services needed by vulnerable persons presenting with protection risks, ADRA Norway Representatives acknowledge their humanitarian duty to take all reasonable steps to support those in need. We do not ignore difficult situations or look the other way.

ADRA Norway promotes safe practices, approaches, interventions and environments that respect, recognize, and respond to the specific safeguarding needs and protection risks for different groups. This responsibility lies with all ADRA representatives at all levels and across all sectors and units.

All forms of harassment, exploitation, abuse, and other forms of harm are never acceptable. ADRA Norway will maintain a zero-tolerance approach to inaction.

ADRA will respond to anyone who raises a credible allegation of misconduct and take necessary action in an independent and thorough manner.

When a claim is substantiated against ADRA or one of our implementing partners, ADRA will do all that is practically feasible to provide confidential assistance and support to the victim or survivor, take appropriate actions towards subjects of complaint, and at the very

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

minimum will ensure that an individual is at no further risk of experiencing that same harm.

To remain compliant with this Policy, ADRA Norway commits to the following measures:

1. ADRA maintains and constantly works towards improving its workplace culture to be a positive environment that encourages diverse thought, transparency, accountability, and respect. ADRA will promote a workplace that is free from bullying, harassment, and other harmful behaviors and practices.
2. Programs and activities supported by ADRA are designed to achieve positive outcomes for, and prevent harm to, all communities directly and indirectly involved in our programs, especially for those individuals identified as vulnerable.
3. ADRA's programs and activities are implemented in safe environments and include general safety measures across thematic areas and contexts.
4. Safety and safeguarding are incorporated into monitoring and evaluation (MEAL) processes to ensure programs and other activities by ADRA are regularly monitored for safety and, where necessary, adjusted accordingly.

Safeguarding Principles

ADRA Norway's values of being connected, courageous, and compassionate along with ADRA's Operating Principles form the foundation for this Policy. Building on these values and principles, this Policy extends the Operating Principles to clearly guide the programmatic service delivery of the Safeguarding Policy:

1. People-centered

ADRA strives to be an organization that places safeguarding at its core and is present in all that we do from recruitment to service delivery. ADRA will take a people-centered approach to its safeguarding work. This means we work preventatively, engage affected populations throughout the program cycle, actively create respectful workplace environments free from bullying and harassment, and ensure that robust procedures are in place for responding effectively to incidents of abuse or harm. ADRA will respond to each person at risk as a unique and valued individual, always mindful that we are working to safeguard individuals who have the right to be involved and informed of all safeguarding decisions which affect them.

2. Justice, Equality and Non-discrimination

The human rights of all people will be respected. ADRA promotes a safeguarding approach that recognizes and addresses the specific safeguarding risks, biases, discrimination, and needs of different ages, genders, sexual orientations, race, ethnicities, tribal affiliations, and other identities in its workplace and programs.

3. Inclusive and Empowering

Decisions made about affected populations, beneficiaries, and ADRA representatives will be made as far as possible with their participation and in their best interest, giving full consideration to how such decisions will affect certain vulnerable groups.

4. Do No Harm

No person must suffer harm, intentionally or unintentionally, as a result of their engagement, association or contact with ADRA. We also commit to a physical and online environment which promotes the safety and wellbeing of affected populations and ADRA representatives, while also minimizing their risk of harm.

5. Zero Tolerance of Bullying, Harassment, Exploitation, and Abuse

ADRA believes that any form of bullying, harassment, exploitation, and abuse (including sexual harassment, exploitation, and abuse) are unacceptable and will not be tolerated. ADRA will act on all credible safeguarding concerns.

6. Shared Responsibilities

Everyone working for or representing ADRA must be aware of and adhere to the provisions of this Policy. Everyone has a duty to report misconduct and improper handling of cases will be penalized. This includes failing to be fully open about what has occurred, purposely delaying the reporting mechanism, or obstructing investigation procedures.

7. Open and Accountable

ADRA encourages an open and transparent environment. Safeguarding concerns can be raised and discussed, poor practice and inappropriate behaviors can be challenged and addressed, and our safeguarding measures will be regularly reviewed and strengthened to ensure we remain accountable to affected populations, staff, and donors.

ADRA also has a responsibility to inform and empower people, particularly women, young children, and those with disabilities, so that they know and are better able to exercise their rights to protection. ADRA will work with everyone from local communities to implementing partners, ensuring they understand the essence of this Policy, their rights, and reporting mechanisms.

At a minimum, beneficiaries have the right to know:	At a minimum, ADRA representatives have the right to know:
<ul style="list-style-type: none"> ● The expected standards of conduct that ADRA representatives must abide by; ● Clear information and updates about ADRA activities, including transparency on funding sources, beneficiary selection criteria and how they will be involved; ● How to access or request additional information if desired; ● To refuse any bribes and not engage in any fraudulent activities; ● The right to humanitarian assistance without being subjected to SHEA; ● Where and how to report sexual harassment, exploitation, and abuse (SHEA) incidents; ● What to expect after making a complaint, including potential referrals, timeframes, and the roles, responsibilities, and any limitations of actors involved; and ● What steps ADRA will take to ensure safety and confidentiality. 	<ul style="list-style-type: none"> ● About their engagement/employment through an onboarding and orientation process; ● The policies, procedures and benefits that are directly relevant to them (policies, handbook, standard operating procedures etc.) ● How to access necessary support; ● The expected standards of conduct when you represent ADRA; ● Understand and have access to the Policy and procedures associated with safeguarding; ● If you are the subject of an investigation, you will know the allegations that are directed to you and have continued employment benefits whilst an investigation is carried out; ● Access to support mechanisms including counselling support; ● Access and knowledge of complaints mechanisms.

8. Governance and Accountability

The ADRA Norway Board has the ultimate responsibility for safeguarding and should always act with humanitarian principles. The Board should not be influenced by special interest and always prioritize ADRA’s interest before any personal interests as stated in the *ADRA Code of Conduct*, *Safeguarding Code of Conduct*, and *Conflict of Interest Policy*.

Safeguarding Risk Assessments

ADRA Norway exercises due diligence to identify, mitigate, and monitor risks of safeguarding incidents. Safeguarding risk assessments and mitigation plans can be incorporated into pre-existing assessments or risk management procedures, such as a security risk register or protection analysis.²

² Tools for safeguarding risk management are located in the Safeguarding Implementation Toolkit on ENet: [Operational Risk Management](#), [Program Risk Management](#), and [Partner Risk Management](#).

- **Operational:** ADRA Norway must conduct an annual risk assessment that identifies organizational risks of creating harm that include administrative areas (e.g. staff, information and technology), which are not necessarily project specific.
- **Project and Activities:** The programs team in collaboration with implementing partners must assess the level of risk for potential negative consequences and adapt the program design or content gathering plan while also including prevention strategies accordingly.
- **Partners** (subgrantees and service providers): In the partner selection process, the ability for the potential partner to comply with the ADRA Safeguarding Framework Policies should be considered. The level of this assessment should correspond with the degree of involvement the partner will have with beneficiaries. Findings from this assessment should inform the eventual contract and work plan between ADRA and the partner to strengthen capacity for the partner.

Reporting Safeguarding Concerns

Conduct that undermines ADRA Code of Conduct, Safeguarding Code of Conduct, and making ADRA a safe agency (i.e. safeguarding) is prohibited under this Policy. Individuals with a complaint or concern related to safeguarding, such as harm taking place within a project or bullying in the workplace, should report it through the appropriate channels:

- If the complaint relates to an incident in the workplace, such as bullying and harassment by a supervisor, it should be reported to HR department/focal point.
- If the complaint or concern is sensitive (relating to sexual misconduct, child safeguarding, child protection or other forms of serious harm), then it should be reported directly to the Safeguarding and Child Protection Focal Point and then the Secretary General within 24 hours or as soon as possible.

If an individual is in imminent danger of serious harm, the complainant should immediately call emergency services, such as the police, before reporting it to through the relevant ADRA channel

The Safeguarding and Child Protection Focal Point and other relevant people should assess the situation for any potential health, safety, and security issues and mitigate serious risks or make referrals immediately. Confidentiality should be balanced with the need to take (possibly immediate) action.

If ADRA representatives do not feel comfortable reporting to the Safeguarding and Child Protection Focal Point, they should report within 24 hours or as soon as possible to:

- Regional Director at their Regional Office;
- Board Chair or the local ADRA Board;
- ADRA International's Safeguarding Office (Protection@adra.org or +1 (301) 680-5168); or
- ADRA International's whistle blowing platform (www.adventist.ethicspoint.com) or +1 (877) 874-8416).

For cases which involve a representative of another organization, the Safeguarding and Protection Focal Point and/or the Secretary General will refer the allegations to the proper focal point within that organization.

The reporting structure and procedures for the ADRA network are further detailed in the **ADRA Global Procedures to Report and Receive Sensitive Complaints**.

Responding to Safeguarding Concerns

When appropriate, an administrative safeguarding investigation will be conducted and possible referral to statutory authorities for criminal investigation under the law of the country in which they work; and/or by ADRA in accordance with disciplinary procedures.

Disciplinary Consequences

Any substantiated violation of the Safeguarding Policy and the Code of Conduct can be considered an act of gross misconduct and cause for termination in line with ADRA Norway's personnel handbook. 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

To comply with the ADRA Norway Safeguarding Policy, ADRA must aim to meet the ADRA Safeguarding Implementation Standards to effectively safeguarding anyone who works with and comes into contact with ADRA Representatives and ADRA projects.

The ADRA Norway Board is ultimately accountable for this Policy and the Secretary General is responsible for its implementation.

ADRA recognizes that strong leadership is essential for diminishing safeguarding risks. Leaders set organizational culture through setting clear expectations, modeling respectful behavior and accountability, taking measures to improve diversity and inclusion; and include safeguarding discussions on meeting agendas. Thus, 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.

This Policy will be reviewed every three years or sooner if needed by the Safeguarding and Protection Focal Point in line with existing Policy review guidelines.

Appendices

A. Statement of commitment to comply with the ADRA Norway Safeguarding Policy

Statement of commitment

I have read ADRA Norway's Safeguarding and Policy and agree to abide by its terms in my work and throughout my time as a representative of ADRA Norway and/or its partners. As a person engaged by ADRA Norway, I will use common sense and avoid actions or behaviours that can be construed as abusive when implementing or participating in ADRA Norway activities. Breaches of this policy will not be tolerated and may constitute grounds for termination of employment contract or volunteer assignment.

I commit to following the correct reporting procedures if inappropriate behaviour is uncovered or if I have any concerns about the wellbeing of individual who benefits from or interact with ADRA's activities.

Name: _____

Signed: _____

Date/location: _____

B. Children and adults and risk report

ADRA Norway children and adults at risk report

1 Type of concern

Does the incident or concern involve an allegation against a staff member? YES
 NO

2 Your details- the person completing the form

Your name:

Position:

Telephone:

Email:

Date and time the incident was reported to you:

3 Details of the person affected

Name:

Contact information:

Is the person a child? (*under the age of 18*)

YES

NO

Age:

Gender:

If the concern is in Norway- Name and contact details of caregiver (if a child or adult with substantial care needs):

If the concern is in a partner country- Name and contact details of the contact person at the partner office:

4 The incident or concern

Date and time of the incident:

Details of the incident or concern:

Details of any witnesses to the incident:

Please provide details of any person involved in this incident or alleged to have caused the incident / injury:

Please provide details of any action taken to date:

Your signature:	Date (<i>when form is being completed</i>):

Send this report to your Safeguarding and Protection Focal Point in line with ADRA's Norway's reporting procedures.

For completion by the Safeguarding and Protection Focal Person:

Name:			Date (when received):
Plan of immediate actions			
Action	By who?	By when?	Update?

Follow up

Is there evidence or suspicion of a breach of ADRA Norway's conduct?

If Yes, what disciplinary action or further investigation will take place?

What is the final outcome of this reported concern?

External reports submitted to ADRA Norway? Yes/No

Date of completion:

C. Safeguarding and protection reporting procedures

S&P FP= Safeguarding & Protection Focal Point

Name:

Phone number/s:

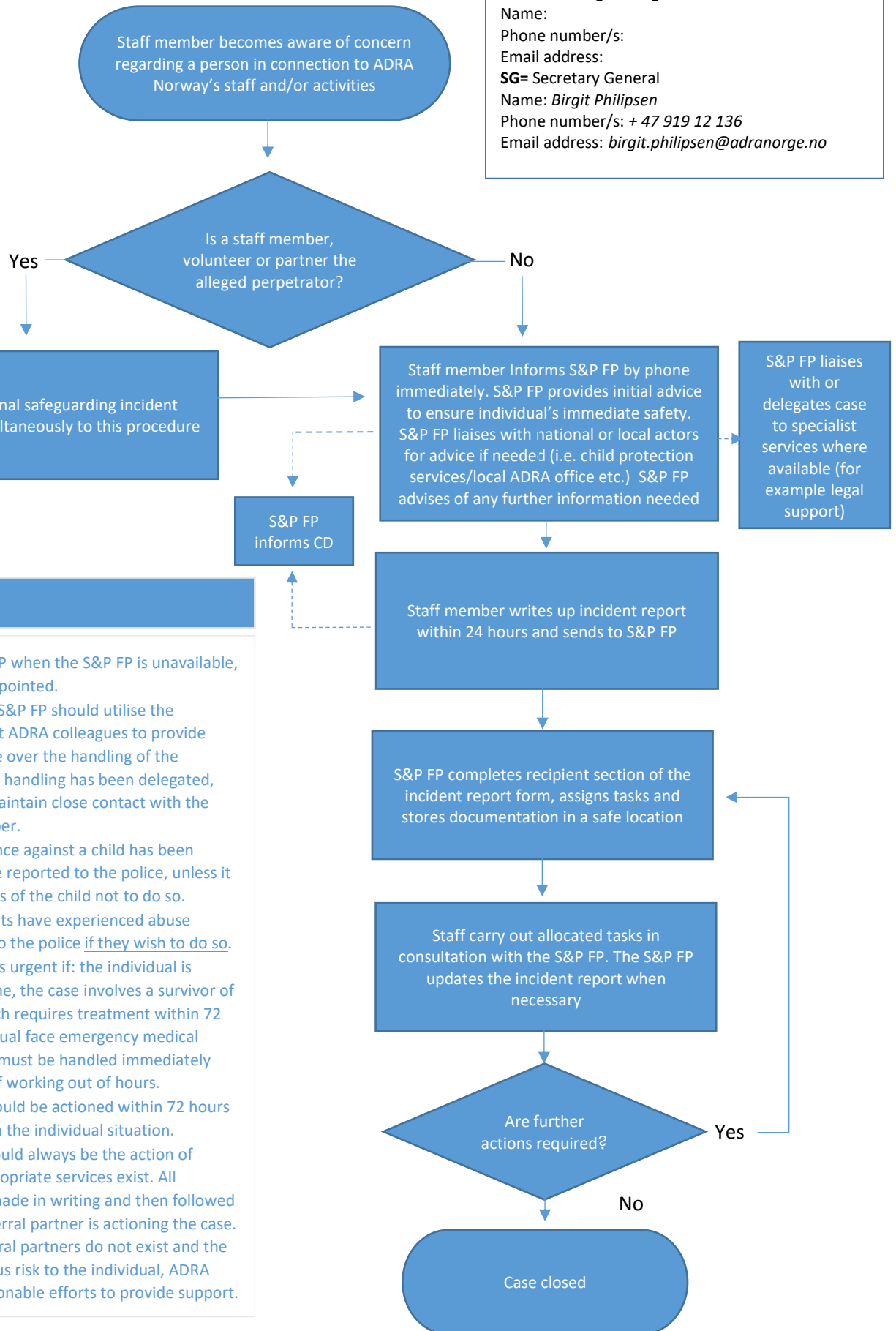
Email address:

SG= Secretary General

Name: *Birgit Philipsen*

Phone number/s: + 47 919 12 136

Email address: *birgit.philipsen@adranorge.no*



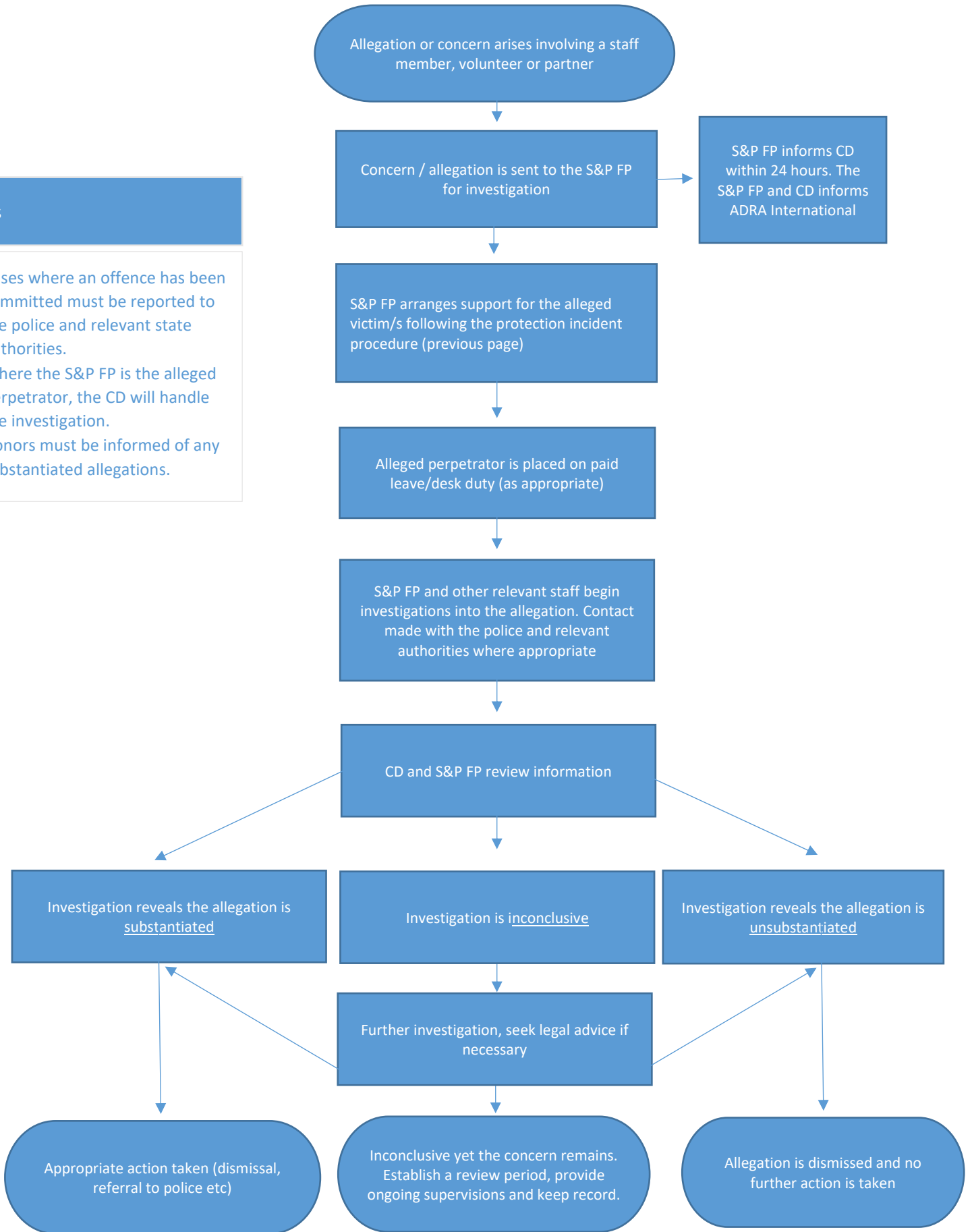
Notes

- The CD acts as S&P FP when the S&P FP is unavailable, unless a deputy is appointed.
- Where possible, the S&P FP should utilise the expertise of specialist ADRA colleagues to provide advice and/or to take over the handling of the concern. Where case handling has been delegated, the S&P FP should maintain close contact with the allocated staff member.
- Cases where an offence against a child has been committed should be reported to the police, unless it is in the best interests of the child not to do so.
- Concerns where adults have experienced abuse should be reported to the police if they wish to do so.
- Cases are classified as urgent if: the individual is unsafe to return home, the case involves a survivor of sexual violence (which requires treatment within 72 hours), or the individual face emergency medical needs. Urgent cases must be handled immediately and may involve staff working out of hours.
- Non urgent cases should be actioned within 72 hours or less, depending on the individual situation.
- Onwards referral should always be the action of choice, as far as appropriate services exist. All referrals should be made in writing and then followed up to ensure the referral partner is actioning the case. Where suitable referral partners do not exist and the case involves a serious risk to the individual, ADRA should make all reasonable efforts to provide support.

Internal Safeguarding Procedure (cases involving allegations against staff)

Notes

- Cases where an offence has been committed must be reported to the police and relevant state authorities.
- Where the S&P FP is the alleged perpetrator, the CD will handle the investigation.
- Donors must be informed of any substantiated allegations.



D. Safe recruitment

Safe recruitment involves ensuring that the protection of children and vulnerable groups is prioritised throughout the recruitment process. It is comprised of a series of measures to identify whether candidates may pose a risk to beneficiaries, communities and other members of staff. It aims not just to identify candidates who are an obvious risk to beneficiaries, such as those with a criminal record of child abuse, but also people who do not share the necessary values and attitudes to safeguard beneficiaries.

Risk categories

Different levels of screening are required depending on the role. ADRA Norway categorises roles as either high risk, medium risk or low risk:

Risk level	Roles in this category
High risk	ADRA Norway employees or ADRA Representatives who have contact with the participants (including children) of ADRA projects and activities internationally or domestically (e.g. employees, contractors or volunteers who will visit projects in Norway or abroad).
Medium risk	Persons who are not ADRA Norway employees, and are ADRA Norway Representatives who have no contact with the participants (including children) of ADRA projects and activities internationally or domestically (e.g. contractors or volunteers who will not visit projects in Norway or abroad); but have access to project management and information storage software.
Low risk	Persons who are not ADRA Norway employees, and are ADRA Representatives who have no contact with the participants (including children) of ADRA projects and activities internationally or domestically (e.g. contractors or volunteers who will not visit projects in Norway or abroad); and Have no access to project management and information storage software.

Recruitment process

ADRA Norway's safe recruitment process involves the following key elements:

1. Advertisement

All risk levels: Recruitment advertising should include a prominent safeguarding statement making it clear to candidates from the outset that ADRA operates a rigorous recruitment

process which gathers robust evidence about candidates' suitability to work with children and vulnerable people/ in an organization working with children and vulnerable people.

The job description and person specification should include a safeguarding statement.

2. Application

High and medium risk levels: Where application forms are used, questions to assess candidates' suitability to work with children and vulnerable groups should be included. The shortlisting panel should review applications or letters of application through a safeguarding lens, looking for any responses or statements made by the candidate which may indicate that they may pose a risk to children and vulnerable groups.

3. Interview

Ensure gender-balanced interview panels during hiring processes and conduct gender neutral interviews³.

All risk categories: Interviews should include questions to assess the attitudes and values of the individual towards safeguarding. Interviewers should identify whether there are any discrepancies between the information in the applicant's CV, application and interview, and seek to understand these. Interviewers should also establish whether there are any gaps in the candidate's employment history, and ask the candidate for information about these.

Ask candidates interview questions about ethics and ethical dilemmas (e.g. What's your idea of an ethical organization? Tell me about a time when you faced an ethical challenge.) For positions falling within risk categories 1 or 2, interviews should include behavioral-based questions that are specific to the position.

4. Self-declaration

All risk categories: Require applicants to self-declare prior issues of sexual or other misconduct, termination of past employment, criminal records, and concerns registered with government authorities regarding contact with children, and to consent to the disclosure of any such information by their former employers during verification of references. This request and the response of applicants must be documented.

5. References

All risk levels: Ensure three written professional references are collected for each staff member, covering a five-year time period where possible. Open references or testimonials

³ Also see [UNICEF Gender Balance Strategies and Tools](#), accessed July 8, 2019

provided by the candidate are not acceptable. ADRA must seek the references directly from the referees to avoid falsification or inaccuracies.

Risk levels 1 and 2: In addition, the referees should be asked whether they are aware of any reason why the individual may not be safe to work with children or vulnerable groups or their data.

5. Identity and background checks

All prospective staff will have their identity verified using original documents.

Online searches should be carried out for all staff.

Risk levels 1 and 2: police checks are required, although the exact requirements will vary depending on whether the staff member has previously worked outside of Norway:

For staff recruited from Norway or national staff: A police records check must be carried out for all staff before employment can be confirmed. At the same time, the police demands that you attach confirmation that you are offered a position, and it is in this time window – after the employment is offered, but before accepted, that the police certificate is obtained. Normally, it only takes 7-10 days police to handle this.

For staff recruited from Norway/ national staff who have spent six months or more working outside of Norway in the past five years: In addition to the Norwegian police check, staff will be required to present a police check or equivalent document for each of the countries they have lived and worked in for a period of six months. Where staff do not have checks readily available, or where there are gaps, it will be necessary to take a pragmatic approach, taking into account the reasons for the difficulty in gaining a police check. Where there are gaps in a candidate's criminal record history, the decision to hire should be made collectively by the ADRA Norway Board, with the reasons recorded and kept in the candidate's file.

For staff recruited internationally, the ideal scenario is that they provide a criminal record check from each country they have lived in for six months or more, dated no more than six months prior to their departure from that country. For seasoned international staff, they will likely have carried out a check in each country they have resided in prior to departure and keep these checks for the purposes of future recruitment. Where staff do not have checks readily available, or where there are gaps, it will be necessary to take a pragmatic approach, taking into account the reasons for the difficulty in gaining a police check. As an absolute minimum, checks will be needed for the new recruit's last country of residence and country of nationality/ original residency. Where there are gaps in a candidate's criminal record history, the decision to hire should be made collectively by the

country's senior management team or board, with the reasons recorded and kept in the candidate's file.

6. Code of conduct and contract

Candidates are required to review and sign ADRA Norway's policies and code of conduct before being offered a contract. Contracts include a safeguarding clause⁴, including when subcontracting, and contracts outline disciplinary measures in the event of proven allegations (e.g. termination of contract).

7. Induction process

Staff induction processes should involve safeguarding, including PSHEA, and child protection training for all staff, regardless of role. The depth of the training required will depend on the level of interaction the staff member will have with beneficiaries, communities and/ or their data. Additional training on wider protection areas, such as sexual and gender based violence, will be helpful for staff in programme roles. Induction processes should involve orientation on internal reporting mechanisms (whistleblowing and reporting of staff misconduct, reporting mechanisms for seeking support for beneficiaries presenting with protection concerns).

8. Staff management

Staff will be provided with refresher courses at regular intervals during employment tenure. Performance appraisals of all staff include adherence to code of conduct (e.g. participation in PSHEA trainings). Performance appraisals of senior staff include a reflection of their effectiveness in creating and maintaining an environment which prevents and responds to safeguarding incidents including SHEA.

Where there are cases of confirmed misconduct, robust disciplinary action will be taken (e.g. dismissal, suspension, written censure or other administrative/corrective measures) and, where this involves possible criminal conduct, this will be reported to the police.

An internal database will be maintained to document any disciplinary measures of personnel, including dismissals, to avoid rehiring them at a later point in time.

Relevant information of personnel known to have committed SHEA or other forms of abuse or inappropriate behaviour towards beneficiaries or colleagues will be shared with other potential employers during background checks, to the extent legally possible.

⁴ For example: "The Contractor shall take all appropriate measures to prevent sexual exploitation or any form of harm or abuse of anyone by its employees or any other persons engaged and controlled by the Contractor to perform any services under the Contract. Any breach of the provision by the Contractor shall entitle ADRA to terminate the contract with immediate effect."