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ADRA Norway Whistleblowing Policy		
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ADRA Norway Whistleblowing Policy

Introduction

ADRA Norway encourages everyone to report any incidences of behavior which are unlawful or breach ADRA's Code of Ethics. This Policy serves as a guide for individuals who have specific concerns that an ADRA Norway Representative's commitment to ethical conduct may be at risk. It addresses how individuals can report specific concerns, how ADRA will address reports, and the protections against retaliation for reporting.

Content of Policy

1. Definitions
2. Purpose
3. Scope
4. Policy Statement
5. Implementation
6. Reporting Mechanisms
7. Receiving and Referring Disclosures
8. Investigations
9. Protections Against Retaliation
10. Reporting Retaliation
11. Appeal Process

Definitions

Whistleblower: A whistleblower is a person who comes forward and shares his/her knowledge on any wrongdoing which he/she thinks is happening in the network, office, or in a specific activity. A whistleblower could be an employee, a contractor, or a supplier, or anyone who becomes aware of any illegal activities.

Whistleblowing: The deliberate and voluntary disclosure of misconduct by ADRA or for which ADRA is accountable (e.g. misconduct by a staff member, volunteer, partner or supplier). The disclosure or attempted disclosure can be by any stakeholder within or outside the network and may be anonymous. The disclosure could be through access to

the data, events, files or any other information about an actual, suspected or anticipated wrongdoing within ADRA.

The disclosure should be made “in good faith”. In other words the disclosure must be made out of real concern about wrongdoing. Knowingly and maliciously making false accusations for ulterior motives is not whistleblowing. The whistleblower should reasonably believe the information and allegation is substantially true, even if the information later turns out to have been incorrect.

Whistleblowing is not the same as making a complaint or raising a grievance, where the individual is saying that they have personally been poorly treated. A whistleblower is usually not directly or personally affected by the concern and therefore rarely has a direct personal interest in the outcome of any investigation into their concerns. The whistleblower raises the concern so that others can address it.

Whistleblowing Event: Concerns that may significantly threaten the health or safety of people, and any irregular/unlawful departmental or organizational practice, including any non-compliance with statutory regulations which affect or that could threaten staff, beneficiaries, donors, the image and/or reputation of ADRA.

Purpose

This Policy has been adopted to ensure that anyone may report wrongdoing that may adversely impact ADRA, stakeholders, employees, or donors, without fear of retaliation or a negative impact on their employment status at ADRA.

Scope

This Policy applies to all who represent ADRA Norway. As a localized version of the ADRA Network Whistleblowing Policy, it covers all ADRA offices and those representing ADRA globally:

- All permanent, temporary, and part-time staff; board members; interns; volunteers; visitors (including media); contractors and consultants; and sub-grantees (local implementing partners and service providers). This group will be referred to as “**ADRA Representatives**” throughout the Policy.
- 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.

Policy Statement

ADRA is committed to integrity and ethical behavior in the workplace and will foster and maintain an environment where its Representatives can work safely and appropriately, without fear of retaliation. ADRA encourages whistleblowing and provides a mechanism through which genuine suspicions (without malice) can be reported on a confidential basis. All ADRA Representatives have a duty to report any breach of ADRA's policies and procedures.

ADRA will act in an objective and appropriate manner to address all reports of alleged improper activities - without retaliation against the whistleblower. Moreover, ADRA will work to help ensure the whistleblower is protected from victimization, reprisal, and other detrimental treatment from other Representatives.

Where whistleblowing may affect an individual's physical or emotional safety or well-being, ADRA will seek to provide timely referrals for medical and/or psychosocial support and seek to ensure their security and safety.

It is in violation of this Whistleblowing Policy for anyone to make a knowingly false complaint of wrongdoing or to provide knowingly false information. This will result in disciplinary action when possible.

Implementation

The ADRA Norway board has ultimate responsibility for this policy.

The ADRA Norway Director is responsible for operationalizing this Policy, which includes the dissemination, training, and sensitization of this Policy within all office locations. Additionally, they are responsible for ensuring that all whistleblowing complaints in their country or region are properly reported and that these whistleblowers are not retaliated against.

Senior Leadership must ensure that all staff, volunteers, suppliers, consultants and implementing partners, as well as affected communities with whom ADRA has contact are aware of this Whistleblowing Policy.

Human Resources should have a signed copy of the acceptance of this Policy on file for each ADRA employee.

When to report and when to not report?

If you become aware of, or have good reasons to believe, that malpractice either has occurred, is occurring, or likely to occur, you should raise this first with your line manager or the suitable person responsible for the person concerned. If you have tried that and feel it has not been taken seriously, or feel unable to use one of these options, then you may whistle blow.

Mechanisms to Report Whistleblowing Events

If you believe in good faith that you have uncovered or observed evidence that indicates abuse, fraud, malpractice or any other breach of the Code of Conduct or something considered a Whistleblowing Event, you are expected to report it. Concerns may be raised verbally or in writing and should include full details and, if possible, supporting evidence.

Confidentiality is assumed unless the complainant agrees that their identity may be revealed.¹ The identity of the individual(s) reporting misconduct should remain confidential to the maximum extent possible, as should all communication with ADRA staff members in question relating to the report.

Reporting Misconduct Through Established Internal Mechanisms

Reports of misconduct should be made through the established internal mechanisms and following ADRA's guidelines. Depending on the nature of the allegations, this may include:

- Line managers
- The ADRA Norway Director
- The Safeguarding and Protection Focal person
- Safeguarding Office at ADRA International (Protection@ADRA.org).

Reporting Misconduct through the General Conference of the Seventh-day Adventist Church

Individuals can anonymously make ADRA-related complaints through the whistleblowing mechanism of the Seventh-day Adventist Church. The Office of the General Counsel, who receives the report, can communicate through the Silent Whistle with the complainant,

¹ In respect of allegations of child abuse or sexual exploitation and abuse, it is important to remember that the best interests of the child and/or survivor are paramount. Any allegation should be reported confidentially to the appropriate individual, who will most likely be the ADRA Norway Safeguarding and Protection Focal Person, since any breach of confidentiality outside of the reporting lines could have devastating effects on the life of the child and/or survivor and his/her family.

while remaining anonymous. To use the Silent Whistle platform, the instructions are as follows:

1. Connect to the Internet from a computer outside of work.
2. Type “www.adventist.ethicspoint.com” into the address bar and hit “Enter.”
3. Select the location where the violation took place. Select “ADRA.”
4. Follow the prompts to file your complaint.

Alternatively, you can call +1 (877) 874-8416 to file a whistleblowing complaint.

Reporting Misconduct Through External Mechanisms

Protection against retaliation will be extended to any individual who reports misconduct to an entity or individual outside of the established internal mechanisms if you do not think that the internal mechanisms are appropriate and you may wish to raise your concerns with an external organization instead, such as a regulator. It is of course open for you to do so, provided that you have sufficient evidence to support your concerns.

Note on Anonymous Disclosure and Confidentiality

Proper investigation may be more difficult or even impossible without having direct access to the individual who initially raised the concern. It is recommended to disclose your identity if possible.

Receiving and Referring Whistleblowing Disclosures

The whistleblower can disclose improper activity as part of normal reporting activity to their manager or relevant person to receive serious complaints in a manner which maintains confidentiality, if desired. The person receiving the complaint will ensure that a written submission of the whistleblowing disclosure is submitted to the Ethics and Compliance Committee.

A) The senior most recipient of the whistleblowing complaint must decide if, where, and when it is referred onwards based on the risk assessment code below.

Risk Assessment Code	Resolution Location and Timeframe for Whistleblowing and Grievance Policies
Catastrophic Presents an immediate danger to life, health, property, or infrastructure and requires emergency correction or control of the hazard to a lower level of risk. Any allegation of child abuse or sexual	Notify ADRA International, the Regional Office, and any supporting ADRA office which has a connection to the incident within 24 hours.

exploitation and abuse that involves an ADRA Representative.	
<u>Critical</u> Represents high level of threat to life, health, property, or infrastructure and requires hazard correction or control of the hazard to lower risk as soon as possible.	Notify the Regional Office and any supporting ADRA office which has a connection to the incident within 1 week.
<u>Significant</u> Represents a medium level of risk to life, health, property or infrastructure, with correction planned and completed, or hazard controlled to a lower risk.	Notify the Regional Office and any supporting ADRA office which has a connection to the incident within 2 weeks.
<u>Minor</u> Represents a low level of risk, with correction planned and completed, or hazard controlled to a lower risk.	Notify the Safeguarding and Protection Focal Point and/or the ADRA Norway Director or Board Chairperson within 3 weeks.

B) If a formal whistleblowing disclosure (see definition of “Whistleblowing Event” above) has been made to ADRA International or through the Silent Whistle, the Appropriate Person will:

1. Refer the complaint to the appropriate person or body within 24 hours of receipt.
2. Acknowledge the receipt in writing within 5 business days (if the identity and contact information is provided if not through the Silent Whistle).
3. Determine whether the disclosure merits an investigation within 10 business days of receiving the complaint, and relay that decision, in writing, to the individual who made the disclosure. In the case of anonymous disclosure, the Appropriate Person must follow the same timeline from the date a formal disclosure is received.
4. Where assessment of the whistleblowing disclosure reveals the need for an investigation, the Appropriate Person will appoint a person to carry out the investigation (known henceforth as the investigation team).

If the reported activity is outside the scope of this Policy, the Appropriate Person should bring this to their governing committee (e.g. such as AdCom), who will direct it to the appropriate authority (e.g. police).

Protections Against Retaliation

All ADRA Representatives have a duty to report any breach of ADRA's policies and procedures to officials whose responsibility it is to take appropriate action. An individual who makes such a report in good faith or cooperates in an investigation of this breach has the right to be protected against retaliation.

Reporting Retaliation

Individuals who believe that retaliatory action has been taken against them because they reported misconduct or cooperated with an investigation should forward all information and documentation available to them to support their complaint to ADRA International.

Similarly, if someone within the organization has asked you to redact your complaint or tried to stop you from reporting, please contact an administrator at ADRA International.

This should be done promptly, in any language desired, and, in any event, no later than 6 months after the alleged act or threat of retaliation has occurred.

Appeal Process

ADRA Representatives (current and former) may appeal the finding and/or the disciplinary measure imposed within five working days of receiving official notice of the investigation's outcome.