

ADRA NORWAY

CODE OF ETHICAL CONDUCT POLICY

ADRA Norway Policies and Procedures	
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Introduction

ADRA Norway is a faith-based NGO established by the Seventh-day Adventist Church in Norway. It was created to assist those in need in a spirit of love and compassion regardless of ethnicity, gender, political or ideological beliefs, sexuality, disability, or another personal characteristic. The ability to achieve this is greatly linked to the people that represent ADRA Norway. Therefore, it is essential that all who work with ADRA Norway maintain and promote the highest degree of ethical conduct by acting with integrity and respecting others without discrimination.

Scope

The ADRA Norway *Code of Ethical Conduct* applies to all ADRA Norway Representatives, defined as: 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).

The *Code of Ethical Conduct* applies while in and outside of the workplace during working and non-working hours every day of the year. In accepting engagement with ADRA Norway, persons listed above must undertake to discharge duties and to regulate conduct in line with the requirements of this *Code of Ethical Conduct*. Persons representing ADRA Norway must comply with these standards, even if they are higher than one's local context or governing laws.

Persons who have not signed a copy of this document are not eligible to travel to or work in project implementation sites. All persons listed above should also be familiar with the policies that this *Code of Ethical Conduct* is based on, namely the *Anti-fraud and Corruption, Procurement, Safeguarding, Protection from Sexual Harassment, Exploitation, and Abuse (PSHEA) and Child Safeguarding Policies*.

Ethical Principles

Equality, diversity and inclusion. ADRA Norway carries out its work without regard to ethnicity, gender, political or ideological beliefs, sexuality, disability, or another personal characteristic. Employees who are found to have discriminated against individuals based on one of these attributes will be subject to disciplinary action and may be liable under state law.

Exploitation. ADRA Norway is committed to preventing the exploitation, abuse, or neglect of our employees, partners, and beneficiaries by creating good working environments and adequate safeguards. In instances where abuse, neglect or exploitation does occur, ADRA Norway will respond to investigate, discipline, and modify policy and safeguards as needed.

Corruption. ADRA Norway does not tolerate corruption. Both ADRA Norway employees and ADRA Partners work to combat corruption and other misuse of aid funds, i.e., to provide oneself, one's organisation or a third party an undue advantage, e.g., by giving or receiving gifts, travels, discounts, bonuses, or other benefits that could potentially influence one's own or the recipient's actions in service. Corruption might occur in many forms, including but not limited to:

- Bribery: When someone gives money, goods, or services for improper compensation or consideration
- Kickback: A form of bribery, where someone involved in a purchasing process receives a reward of money, goods, or services for improperly selecting the supplier
- Embezzlement: Theft of resources for one's own use
- Extortion: The act of obtaining something by force, threats, or undue demands
- Favouritism: The unfair favouring of one person or a group at the expense of others
- Nepotism: favouritism shown to relatives
- Unnecessary waste: Deliberate mismanagement, inefficiency, or wastefulness

Transparency. ADRA Norway strives for openness, honesty, and accountability both internally and externally with donors and members of the public. We accomplish this through transparency relating to activities and finances to the government, the public, donors, partners, beneficiaries, and other interested parties. Information regarding ADRA Norway's basic financial information, governance structure, activities, procurement procedures,¹ management, and partnerships shall be open and accessible to public scrutiny, and we will endeavour to inform the public about our work and the origin of our support. ADRA Norway will be accountable for its actions and decisions, not only to those who provide us with private and public funding, but also to the people we serve, our staff and constituents, partner organizations, and the public.

Child Protection and Safeguarding. ADRA Norway defines safeguarding as providing a working environment free from abuse and harm to anyone that works with and encounters ADRA Norway Representatives and its projects. ADRA Norway seeks to ensure that those representing the work of ADRA Norway do not abuse their power. This *Code of Ethical Conduct* is intended to assist ADRA Norway Representatives who engage with vulnerable people to understand and acknowledge their obligations to make ethical decisions in their professional lives and at times in their private lives. By agreeing to this *Code*, ADRA Norway Representatives agree not to use their power and privilege of any kind, but rather promote the wellbeing of those who encounter ADRA and protect them from harm. ADRA Norway recognizes and respects the rights of minors as defined by international standards including the UN Convention on the rights of the child.

Humanitarianism. The following humanitarian principles underpin our work:

- It is a basic right to receive and provide humanitarian assistance
- Apply principles of humanity, equality, neutrality, and impartiality
- Provide assistance regardless of ethnicity, gender, political or ideological beliefs, sexuality, disability, or another personal characteristic. Assistance priorities are calculated based on need alone and will not be used to further a particular political or religious standpoint
- Endeavour not to act as instruments of government foreign policy
- Respect local culture and customs and build local capacities of the communities we work in, including inclusion of beneficiaries in planning and evaluation, supporting localization
- Carefully monitor the ramifications of our assistance to ensure that our presence does not provide or signal support for repressive governments
- Hold ourselves accountable to both recipients and supporters
- Protect the identity and dignity of those pictured in our information and publicity work

¹ See ADRA Norway Procurement Policy

Reporting, Investigation, and Disciplinary Procedures

Reporting. An instance of inappropriate or unethical behaviour should be reported directly to the ADRA Norway Secretary General. Due to the urgency of the situation this may be verbal but must be followed by a written statement. If one believes that the Secretary General will not or cannot be impartial, then they should report directly to the Board Chair or through other channels for example to <https://www.adranorge.no/varsling-norsk/> or <https://www.adranorge.no/whistleblowing/> or one can contact the ADRA Network Safeguarding Officer Protection@ADRA.org or use ADRA's Silent mechanism: www.adventist.ethicspoint.com

Investigation Procedure. The Secretary General must communicate the allegations to the Board Chair. The Secretary General, Board Chair, and one other board member will be responsible for carrying out an appropriate investigation of the allegation while maintaining the anonymity and confidentiality of what has initiated the investigation. Depending on their initial findings they may choose to investigate further, to inform donors, to involve the appropriate authorities, or report the matter to the entire board, as they deem appropriate.

Disciplinary Procedures. The three persons mentioned above will, after they have investigated and examined the matter, decide on an appropriate response in keeping with the seriousness of the offence. Breaches of the *Code of Ethical Conduct* are grounds for disciplinary action, up to and including termination of employment, contract, volunteer assignment, or any other form of engagement. ADRA Norway will take the necessary steps to enable reporting and every effort will be made to ensure anonymity and confidentiality as part of this process. Actions may include but are not limited to the following:

- Take no action
- Issue a written or verbal warning
- Hold an employee liable for financial or physical damages
- Move to terminate employment
- Move to initiate criminal proceedings

Anyone who is found to have harassed, coerced, intimidated, or retaliated against another in violation of this Code will be subject to prompt and appropriate disciplinary action, up to and including termination as defined by the ADRA Norway HR policies and procedures where the incident occurred.

Support to Victims of Exploitation or Abuse. ADRA Norway will provide follow-up and support to victims e.g., for cases of sexual exploitation and abuse, and work to prevent retaliation against persons who have notified the organisation of violations of this *Code of Ethical Conduct*.²

² See ADRA Norway Whistleblowing Policy for more information

Code of Ethical Conduct

As representatives of ADRA Norway, we will:

1. *Uphold the integrity and reputation of ADRA Norway by ensuring that professional and personal conduct is demonstrably consistent with ADRA Norway's values and standards:* We will seek to maintain and enhance public confidence in ADRA Norway by being accountable for the professional and personal actions taken and ensuring that we manage the power that comes with our ADRA position with appropriate restraint. We will ensure our conduct is consistent with the values and principles of ADRA Norway
2. *Protect the health, safety, security, and welfare of all ADRA Norway Representatives:* We will undertake and act on appropriate risk assessments. We will comply with local security and risk management guidelines and be proactive in informing management of any necessary changes to such guidelines. We will behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including staff, partners organizations, and beneficiaries.
3. *Be efficiency and attention on the job:* The hours of employment or engagement shall be devoted to the work assignment entrusted to employees and related personnel. I have a personal responsibility to carry out work conscientiously, efficiently, and honestly. I shall not use ADRA Norway's time for personal business or for the advancement of personal interests unrelated to this agency. When working part time, we will not enter other employment or activities which impair my performance for ADRA Norway. We will aspire for greater efficiency, effectiveness, and excellence. Furthermore, we will not work under the influence of alcohol or use or be in possession of illegal substances or legal substances that may impair judgement, on ADRA premises, vehicles, or accommodation
4. *Comply with laws rules and regulations:* We are required to comply with all laws, rules and regulations that govern ADRA Norway and wherever one travels to on behalf of ADRA Norway. We will be sensitive to, and respectful of, local customs and culture, even if the norms and values in that cultural context differ from the *Code of Ethical Conduct*. We will comply with all international and local legislation. In cases where such laws, customs or traditions contravene the UN Convention on the Rights of the Child and the Universal Declaration of Human Rights these latter two shall prevail. We will not support nor take part in any form of illegal, exploitative, or abusive activities, including, for example, child labour, and trafficking of human beings and commodities. We will consult with local ADRA Norway administration for clarification of any legal requirements
5. *Respect confidentiality and privacy:* We will use discretion when handling sensitive, confidential, and/or proprietary information. Unauthorized disclosure of confidential information during the period of employment or association with ADRA or after leaving ADRA Norway is strictly prohibited. We will cooperate to comply with relevant national laws regarding data protection principles that govern the use of personal data for which ADRA Norway is the data controller with a view to ensuring that personal data is processed lawfully, collected for legitimate purposes, limited to what is necessary, accurate, kept for no longer than necessary and handled securely and responsibly.³ When photographing or filming people, in particular children for work related purposes, I must comply with local restrictions, obtain informed consent, ensure that persons are presented in a dignified manner representative of reality, and protect the privacy of the person through proper data protection

³ Refer to the ADRA Norway GDPR / data protection policy

Prevent Fraud and Corruption

6. *Maintain an honest, courteous, and ethical environment in the workplace:* We will practice the highest ethics in dealing with each other and when representing ADRA Norway in dealing with other parties. We will not engage in corruption, theft, or fraud of any kind, including misuse of expense accounts, falsification of documents reports, and misapplication of resources. I accept that it is my responsibility to report such acts through established reporting mechanisms and am accountable for behaviour that is inappropriate, or which undermines the ethical and moral environment in the workplace. We will:
 - not give or accept bribery in any form
 - not use deception, trickery, or breach of confidence to gain an unfair or dishonest advantage
 - not misappropriate or otherwise divert funds or assets entrusted to me
 - not give, solicit, or receive directly or indirectly any gift or other favour that may be seen to influence the exercise of my function, performance of duty or judgement
 - report any evidence or suspicion of fraud or corruption
7. *Declare Conflicts of interest:* We will perform my duties and conduct my private life in a manner that avoids possible conflicts of interests with the work of ADRA Norway. Any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of ADRA Norway must be declared. We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery or other situations. Furthermore, we will ensure that my behaviour does not jeopardize ADRA Norway's neutrality or negatively affect its work
8. *Respect for organisation-owned assets:* We will respect the property of the organisation, including any intellectual property, that is developed or procured in the course of employment or engagement, which will remain the exclusive property of ADRA Norway unless Board or AdCom approved. We will use ADRA property, facilities, and resources solely for the benefit of the organisation's mandate. All assets and resources entrusted to ADRA Norway Representatives must be accounted for by that individual or partner

Prevent Sexual Harassment, Exploitation, and Abuse

9. *Treat all people with respect and dignity and challenge any form of bullying, harassment, discrimination, intimidation, exploitation, or abuse:* We will contribute to a working environment characterized by integrity, dignity, and mutual respect. We will refrain from placing another in a position of embarrassment, disrespect, or harassment. Sharp personal criticism, gossip and behaviour that may be construed as inappropriate is prohibited. This respect does not in any way counteract the requirement to report on unethical, dishonest, or abusive behaviour including suspected or actual sexual harassment, exploitation, and abuse through the reporting systems. Similarly, ADRA carries out its work without regard to ethnicity, gender, political or ideological beliefs, sexuality, disability, or another personal characteristic. Employees who are found to have discriminated against beneficiaries or community members will be subject to disciplinary action and may be liable under state law
10. *Protect beneficiaries and treat them with dignity and respect:* We will ensure assistance is delivered in a way that is safe, appropriate, and equally accessible. We are obligated to create and maintain an environment that protects and prevents violence, harm, and abuse of any type including child abuse, gender-based violence, and harassment. We will avoid actions or behaviours that could be construed as sexual harassment, exploitation and abuse or child abuse. Sexual harassment, exploitation, and abuse are human rights violations, unacceptable behaviour, and jeopardizes the credibility and

reputation of all development and humanitarian organizations. Any abuse or perceived abuse of power by ADRA Norway Representatives undermines the credibility and integrity of the individual and ADRA. At no time will we use our position or role of authority to humiliate, degrade or exploit a beneficiary. We must be ready to bring to the attention of relevant management within ADRA Norway any potential incident, abuse, or concern that we witness or am made aware of. We understand that:

- Verbal conduct such as sexually derogatory remarks, graphic verbal commentaries about an individual's body or dress, sexually degrading words 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 are strictly prohibited
 - Visual conduct such as leering, sexual gestures, displaying or distributing sexually suggestive objects or pictures, cartoons, graffiti posters or magazines
 - Actual or threatened physical contact or conduct, such as patting, pinching, blocking movements, or any other offensive touching
 - I must disclose any substantiated claim and/or criminal conviction of sexual misconduct
11. *Prevent sexual exploitation, abuse, and harassment*, by committing to respect the six core principles outlined in the Secretary-General's Bulletin⁴ and ADRA's PSHEA Policy:
- Sexual harassment, exploitation, and abuse are **serious misconduct** and grounds for **disciplinary measures**, including summary dismissal
 - Sexual activity with **children** (persons under the age of 18) is strictly **prohibited**, regardless of the age of majority or local age of consent. Mistaking the age of the child is not a defence
 - Exchange of **money, employment, goods, or services for sex**, including any humiliating, degrading, or exploitive behaviour is strictly **prohibited**. This includes exchange of assistance that is due to beneficiaries
 - Any **sexual relationship between those providing development or humanitarian assistance** and protection and a **person benefiting** from such assistance and protection that involves improper use of rank or position is **prohibited**
 - Where an ADRA Norway Representative has **concerns or suspicions** regarding sexual harassment, exploitation, and abuse by an aid worker he/she **must report** such concerns.

Protect Children

12. *Disclose to ADRA Norway any criminal charges, convictions or accusations*, and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during my association with ADRA Norway
13. *Not use ADRA's computer equipment* or other technology or office space to view, download, create, distribute, or save in any format inappropriate material, including but not limited to adult or child pornography or anything sexual in nature. We will not use any computers, mobile phones, video cameras, cameras, or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium
14. *Ensure safe behaviours in our interactions with children*. We must be aware of behaviours and avoid actions that could be perceived by others as child exploitation and abuse, such as:
- Wherever possible, ensure that another adult is present when working with or near children
 - Avoid involvement in unsupervised one-on-one counselling with minors and children

⁴ Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

- Not invite unaccompanied children into my home or hotel, or into a closed room unless they are at immediate risk of injury or in physical danger
 - Not sleep close to unsupervised children without my supervisor's permission and another adult present
 - Not develop special relationships within a specific child or children, show favouritism or give gifts or particular attention to a child
15. *Prevent and report all forms of exploitation and abuse of children.* We understand that the following behaviours are strictly prohibited:
- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
 - Hiring children for domestic or other labour, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
 - Giving illicit drugs or any beverage containing alcohol to a minor under any circumstances
 - Use of physical punishment on children
 - Engaging children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
16. *Immediately report concerns, suspicions, or allegations* (including any allegation by a child) of child exploitation and abuse and breach or non-compliance with the *Child Safeguarding Policy* in accordance with appropriate procedures through the designated reporting channels, or I can complain or make complaints on behalf of a survivor by contacting either one of the following:
<https://www.adranorge.no/varsling-norsk/> or <https://www.adranorge.no/whistleblowing/> or one can contact the ADRA Network Safeguarding Officer Protection@ADRA.org or use ADRA's **Silent** mechanism: www.adventist.ethicspoint.com



Code of Ethical Conduct

Personal Declaration Form

I have received, read, understand, and agree to the *ADRA Norway Code of Ethical Conduct* for ADRA Norway Representatives and agree to always comply fully with the standards and procedures contained in the *ADRA Norway Code of Ethical Conduct* and related ADRA Norway policies and procedures for the entire period I am working for, associated with, and/or represent ADRA Norway.

I will report any concern, incident or suspicions regarding breaches relating to this *Code of Ethical Conduct*.

Printed Name: _____

Position: _____

Signature: _____

Date: _____

Code of Ethical Conduct Summary

As representatives of ADRA Norway, we will:

1. Uphold the integrity and reputation of ADRA Norway by ensuring that professional and personal conduct is demonstrably consistent with ADRA Norway's values and standards
2. Protect the health, safety, security, and welfare of all ADRA Norway Representatives
3. Be efficiency and attention on the job. We will not use or be in possession of illegal substances or legal substances that may impair judgement, on ADRA premises, vehicles, or accommodation
4. Comply with laws, rules, and regulations. We will be sensitive to, and respectful of, local customs and culture. We will not take part in any form of illegal, exploitative, or abusive activities, including, for example, child labour, and trafficking of human beings and commodities
5. Respect confidentiality and privacy. We will cooperate to comply with relevant national laws regarding data protection and the use of personal data

Prevent Fraud and Corruption

6. Maintain an honest, courteous, and ethical environment in the workplace. We will not engage in corruption, theft, or fraud of any kind, including misuse of expense accounts, falsification of documents reports, and misapplication of resources. We will not give or accept bribery, use deception, trickery, or breach of confidence to gain an unfair or dishonest advantage, misappropriate or otherwise divert funds or assets. We will report any evidence or suspicion of fraud or corruption
7. Declare Conflicts of interest. We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery or other situations
8. Respect for organisation-owned assets. We will use ADRA property, facilities, and resources solely for the benefit of the organisation's mandate

Prevent Sexual Harassment, Exploitation, and Abuse

9. Treat all people with respect and dignity and challenge any form of bullying, harassment, discrimination, intimidation, exploitation, or abuse
10. Protect beneficiaries and treat them with dignity and respect. Maintain an environment that protects and prevents violence, harm, and abuse of any type including child abuse, gender-based violence, and harassment. We will refrain from verbal, visual, or physical conduct that humiliate, degrade or exploit others.
11. Prevent sexual exploitation, abuse, and harassment, by committing to respect the six core principles outlined in the Secretary-General's Bulletin and ADRA's PSHEA Policy

Protect Children

12. Disclose to ADRA Norway any criminal charges, convictions, or accusations
13. Not use ADRA's equipment or office space to handle inappropriate material, such as adult or child pornography or to exploit or harass children
14. Ensure safe behaviours in our interactions with children. We must be aware of behaviours and avoid actions that could be perceived by others as child exploitation and abuse
15. Prevent and report all forms of exploitation and abuse of children. This includes the use of provocative language, use of children for domestic or other labour, giving children illicit drugs or alcohol, physical punishment of children, or engaging children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
16. Immediately report concerns, suspicions, or allegations (including any allegation by a child) of exploitation and abuse