

# ADRA Global Procedures to Report and Receive Sensitive Complaints

## ADRA Network Policies and Procedures

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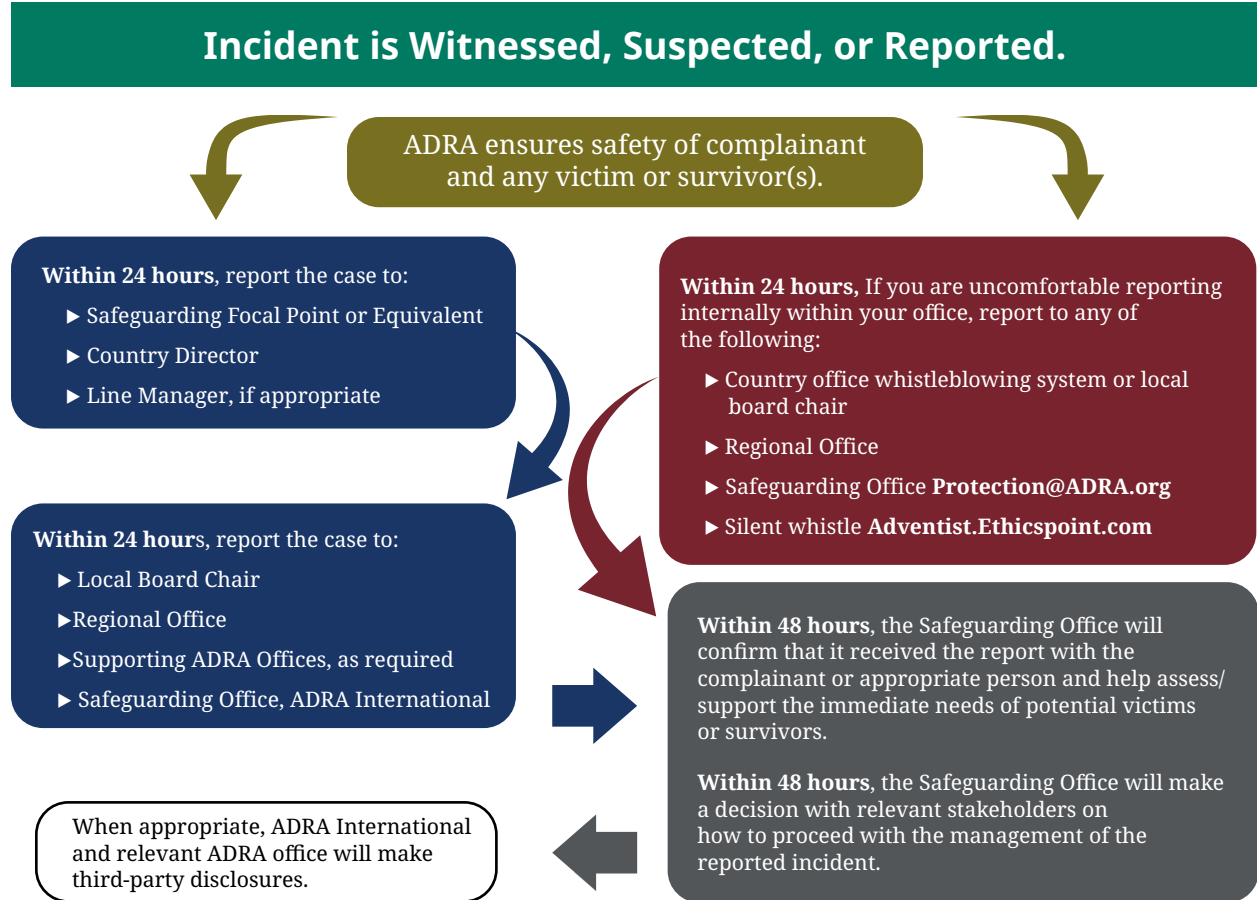
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## Section One

### Reporting Allegations of Sexual Harassment, Exploitation, and Abuse (SHEA) and Child Abuse



## Explanation of Each Step

### What are the Global Reporting Procedures?

The reporting mechanism described in this document is intended to cover the entire ADRA network. While country offices remain independent, the ADRA network serves as a shared resource that every member depends on to uphold its values. The reputational risk is thus shared throughout the network, which is why allegations of sexual misconduct and child abuse remain a central issue for ADRA. Therefore, the reporting and management of such cases must be streamlined in a centralized and uniformed manner. The Global Reporting Procedure attempts to accomplish that.

**Section One, con't**

Country offices should maintain administrative and project-level complaint and response mechanisms that reach beyond the channels and procedures in this document to hold the organization accountable in all areas of implementation.

**When do I report?**

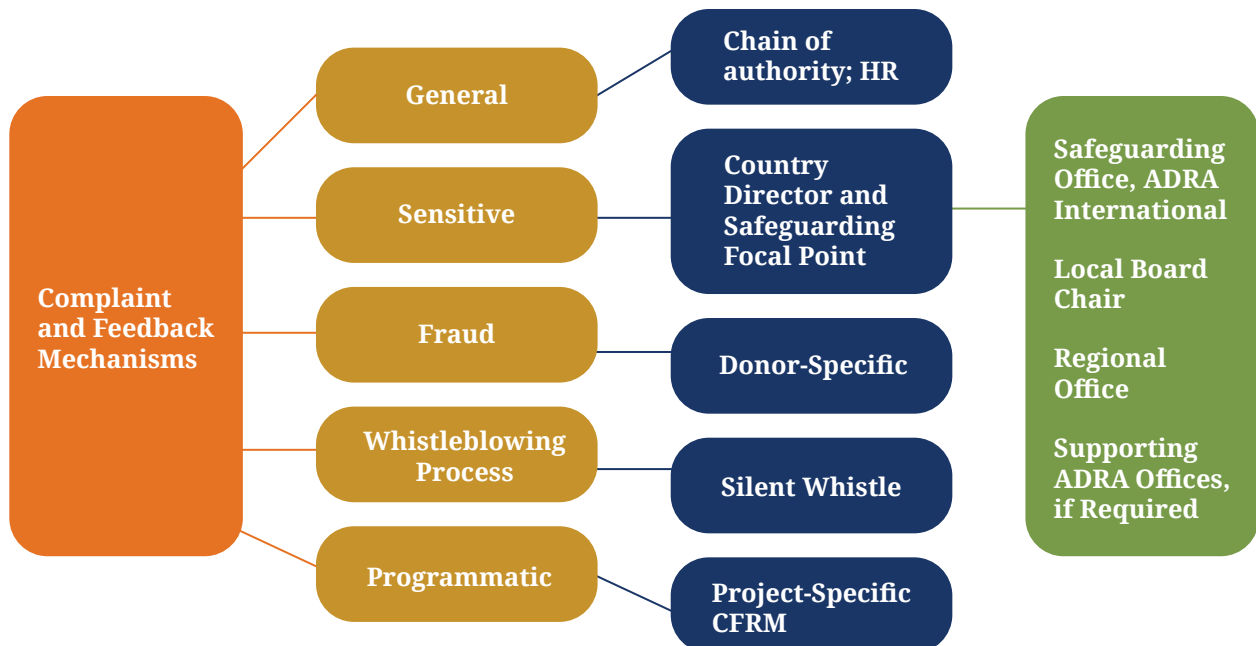
You should report within 24 hours or as soon as possible after witnessing, experiencing, or becoming aware of a potential incident.

ADRA Representatives have a duty to report, even rumors, of SHEA and child abuse per the *PSHEA Policy* and the *Child Safeguarding Policy*.

**When do I report?**

ADRA Representatives must be aware of the proper reporting procedures in the case that you experience, learn of, or witness a sexual harassment, exploitation, abuse (SHEA) or child abuse incident. You may use any in-country reporting channel available on an interagency level, but the primary point of contact should be the established reporting channels within ADRA as outlined in this document.

**How are community-based or project-level complaint and feedback mechanisms integrated into the Global Reporting Procedures?**



## Section One, *con't*

When alleged incidents of SHEA or child abuse are reported through a community, project or country office's complaint and response mechanism, the reports should trigger and be referred into the reporting channels explained in this document.

If a complaint is made in-person by a beneficiary or a member of the affected population, that staff member or a Safeguarding Focal Point within that office should work with the complainant to complete an incident reporting form.

If the complaint is not made in-person, such as through a comment box, the staff member should report immediately to the appropriate person within their office without revealing the identity of the complainant. A decision to complete the incident reporting form will then be made later, once risks to the complainant are considered with the Country Director, Safeguarding Focal Point (if possible) and the Safeguarding Office at ADRA International with input from the Regional Office and any supporting ADRA office as required.

### **To whom should I report?**

Depending on the context, you can choose to report the allegation through one of several channels.

1. ADRA staff should report directly to their Safeguarding Focal Point (or an equivalent position if it exists within an office) and Country Director, while also informing their line manager if appropriate. The information shared should not include personal details of the potential survivor of SHEA or child abuse. This must occur within one day or as soon as possible.

The Country Director must then inform their Board Chair, Regional Office, any relevant ADRA partner office (as required), and the Safeguarding Office at ADRA International within the following 24 hours.<sup>1</sup> The Country Director and the Safeguarding Focal Point should assess the situation for any potential health, safety, and security issues and mitigate serious risks or make referrals immediately.

When possible, please submit an incident reporting form- otherwise only report basic, anonymized information. English is the preferred language to submit a report, but reports received will be processed regardless of the language.

<sup>1</sup> All ADRA partners funding an ADRA office where an alleged safeguarding incident occurs, even if their funded project is not directly affected, will be notified by ADRA International within 10 days of receiving the complaint. ADRA Country Offices receiving external funds to implement in the country where the incident occurred will be responsible for managing third party disclosures, such as multilateral donors.

## Section One, *con't*

### To whom should I report?, *con't*

2. If you genuinely believe that the primary reporting route is compromised, that you would be victimized for reporting, you have no confidence in the local management structure, or the complaint involves a senior member of staff or the board within your country office, then a report should be raised directly with the Regional Office and/or the Safeguarding Office at ADRA International. When possible, please submit an incident reporting form. Otherwise only report basic, anonymized information.
3. Thirdly, ADRA International can receive allegations through an anonymous whistleblowing that is managed by the General Conference of the Seventh-day Adventist Church based in the United States. Reports made through this website are received by the General Counsel of the General Conference of the Seventh-day Adventists and either referred to the Board Chair of ADRA International or to the Vice President for People and Culture, who then manage the case appropriately.

### What happens once the Safeguarding Office at ADRA International receives the allegation?

#### Step One: Referral and Processing of Complaints

All complaints will be assessed by the Safeguarding Office with the Regional Office and any supporting ADRA office as required under strict conditions of confidentiality to determine their nature and the level of sensitivity/priority. All complaints will be assessed to identify those which alleged misconduct falling within the scope of the ADRA Safeguarding Framework Policies. Such an assessment is necessary as reporting all suspicions are highly encouraged but not all complaints received are best managed by the Safeguarding Office. This first step is not to substantiate a claim or determine whether there is a sufficient basis for investigation, but only to determine if the complaint constitutes a safeguarding-related allegation and to assist in the referral of the victim or survivor to the appropriate services.<sup>2</sup>

The Safeguarding Office will send a confirmation that the allegation was received and if no further action is required by the individual referring the complaint within two days (48 hours). This step may require support from the Country Office to contact the complainant in the appropriate language and manner, as well to maintain a consistent focal point for

<sup>2</sup> **Note for Programmatic Staff:** For beneficiaries to have faith in complaint and response mechanisms, all complaints reported to it must be properly followed up on, not just those alleging SHEA. Given that experience shows the majority of complaints received through a CRM are not related to SHEA, ADRA has a vested interest to ensure that general project or service-related complaints are also addressed. This preserves the credibility, and thus the usage, of the CRM. It is beneficial to also track whether/how the non-SHEA complaints are handled to contribute to a more comprehensive system of accountability.

## Section One, *con't*

### **Step One: Referral and Processing of Complaints, *con't***

the complainant. This acknowledgement can be a standard notification stating merely that the complaint was received and the date. This should not be confused with the feedback to the complainant on case status and determination, which are also encouraged and shall be done in compliance with the ADRA Investigation Manual (currently being developed).

Upon learning of the alleged safeguarding incident, the Safeguarding Office in conjunction with relevant ADRA stakeholders, specifically the local Safeguarding Focal Point (if the position exists), will assess the immediate and comprehensive needs of the complainant and victims. This assessment, if appropriate, will be a participatory process with the complainant and/or victim(s) that will prioritize their preferences on how to proceed on the actions needed to help keep them safe. Specific measures related to incidents of child abuse are discussed in Section Three.

### **Step Two: Initial Inquiry**

The Safeguarding Office may need support to collect more information about the concerns raised. This will help determine the potential seriousness of the concerns and to inform decision making. The purpose of these inquiries is to:

- ▶ Further establish the nature and extent of the concern;
- ▶ Share information;
- ▶ Agree on the next steps that need to be taken; and
- ▶ Identify the timeline and individuals to take forward the selected course of action.

If the inquiry or report is referred back to a country office or to an entity outside of ADRA International, the Safeguarding Office will typically support by:

- ▶ Monitoring the situation of the complainant and/or victim (i.e. continue to assess concerns)
- ▶ Make inquiries about the wellbeing of the complainant and/or victim
- ▶ Research the local support options and confirm their referral requirements; and
- ▶ Provide guidance on the investigation process and findings.

## Section One, *con't*

### Step Three: Selecting the Course of Action

Once assessed, the Safeguarding Office in collaboration with other ADRA office stakeholders will make one of the following decisions within 10 days:

1. **Internal Referral:** A complaint that does not involve a safeguarding allegation, but rather a broader humanitarian assistance provision or staff issue, will be recorded and transferred directly back to the country office and/or possibly the regional office. Transfers of such complaints must also be made in a timely manner.
2. **No Further Action:** If the findings from the initial inquiry have determined that there is no basis to the allegation or expression of concern at this stage then the case may be closed, and no further action taken. The information discussed, decision reached and the reasoning behind it will be recorded for an audit trail. The information can be used to support disciplinary action resulting from a false allegation with malicious intent and/or because the concern may resurface again in the form of a re-referral of the case.
3. **Disciplinary Action in Respect of the Individual:** For cases limited to breaches of internal policies and procedures, disciplinary action will be taken in accordance with the disciplinary policies of the employee's country office and network policies.
4. **Referral to Statutory Authorities:** The default position is that if there is reasonable cause to believe that an ADRA Representative has possibly committed a criminal offence against or related to a child and/or involves sexual abuse, the matter will be reported to the relevant statutory authorities for consideration of criminal action.

Before referring a case to statutory authorities, a risk assessment must be conducted, and legal advice sought to ensure that reporting won't pose additional risks to the alleged victim or survivor or their family. The consent of the victim or survivor must also be weighed in this decision. In countries with punitive laws towards victims and survivors of sexual violence, ADRA may choose not to report. The decision whether to report the matter to statutory authorities will be made by the Safeguarding Office in coordination with the Investigation Committee, legal counsel if available, and in consultation with the director of the country or region where the incident occurred.



## Section One, *con't*

### 4. **Referral to Statutory Authorities:** *con't*

For cases which involve a possible criminal offence, consideration can be given to enacting disciplinary action concurrent to an investigation process. However, in such circumstances the police and other relevant agencies must be consulted before informing a person who is the subject of allegations. Sexual violence and child protection legislation within individual countries should be used to inform practice within this area. In exceptional circumstances the subject of the complaint may be suspended, an internal investigation conducted, and the findings used to strengthen the referral to local police. This is only likely to occur in situations within which countries have weak protection systems (as identified in the risk assessment and office's context map), unreliable law enforcement agencies and when a referral without a full report would not be accepted.

### 5. **Referral to Other Organizations:** For cases which involve a representative of another organization, the Safeguarding Office will refer the allegations to the proper focal point within that organization, ideally following interagency protocol. If the organization of the subject of the complainant is a partner of ADRA, pre-established partnership joint procedures should be followed. Consideration for why the complaint was not originally to that organization will be considered.

The maximum processing time for a complaint before referral to the concerned agency should be as soon as reasonably possible, and no longer than 48 hours from the time the Safeguarding Office receives the complaint if the complainant and victim are at high risk. As a matter of due diligence to ensure that the allegation was properly referred and received by the appropriate unit in the concerned agency, the Safeguarding Office should also include a request to confirm receipt.

### 6. **Administrative Safeguarding Investigation:** The decision to investigate is a joint decision made by the Safeguarding Office, Regional Office, supporting ADRA office as required with input from legal counsel. Internal administrative safeguarding investigations will only be sanctioned if further assessment is required before further action can be taken.

An investigation is an in-depth inquiry into raised concerns and is most likely to take place in country.<sup>3</sup> All measures should be taken to enable investigations to commence within 5–10 working days of the initial referral and be concluded within 30 to 90 working days.

<sup>3</sup> All investigations are unique due to the nature of abuse, which limits the amount of general guidance that can be issued. However, the purpose of the investigation is to establish the facts, not to accuse. Investigations should be conducted impartially and give any staff involved a fair hearing. This means that all stages of an internal investigation must be conducted professionally, objectively and fairly. The purpose of an investigation is not to prove beyond reasonable doubt that activity has taken, or is taking place, that is harmful but rather to assess on the 'balance of probability' the validity or otherwise of the suspicion and concern that has arisen. An investigation manual is currently being produced by ADRA International.

## Section One, *con't*

### Step Four: Reporting

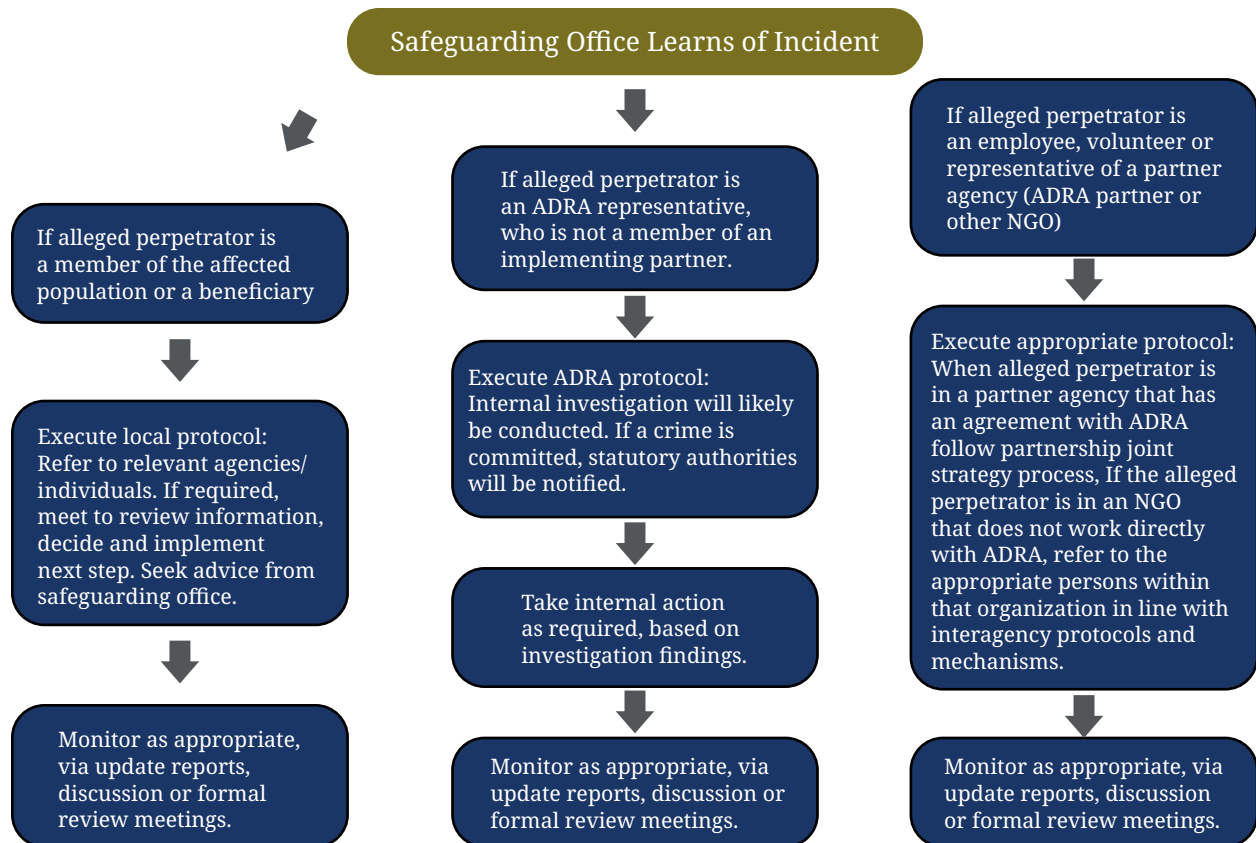
Once ADRA International receives a safeguarding complaint, the Safeguarding Office will support the Country Office where the alleged incident occurred to report to ADRA and external stakeholders.

Term	Definitions and Examples
<b>Board Chair</b>	The Board Chair of the office where the alleged incident occurred will be informed within 48 hours of the Safeguarding Office receiving a report if the incident involves the Country Director. Otherwise, reporting to the Board will be the responsibility of the Country Director.
<b>Country Director</b>	If there is no conflict of interest and the CD was not originally informed when the allegation was reported, the Safeguarding Office will inform the CD within 48 hours of receiving the incident.
<b>Regional Offices</b>	If there is no conflict of interest, the Safeguarding Office will inform the head of the Regional Office within 48 hours of receiving the incident. Please note that the Regional office should be notified though within 24 hours of a country office receiving a sensitive complaint.
<b>Supporting ADRA Offices</b>	<p>If the allegation occurs within a specific project, such the incident involves a beneficiary or a staff member funded by a supporting office, then the supporting ADRA office(s) must be informed within the initial 24 hours.</p> <p>If the complaint includes someone at management level, then all supporting offices of the partner will be informed.</p> <p>Some donors require notification within 24 hours even if the incident did not occur within their project. Supporting ADRA offices and their partners must be aware of these requirements at the time of signing the partnership agreement.</p> <p>All other ADRA supporting offices who are not involved in the complaint will be informed when an investigation is opened and closed in the partner office with limited details.</p>
<b>External Donors</b>	If a partnership agreement includes mandatory reporting of safeguarding incidents, the donor will be informed by the appropriate ADRA office at the start and the end of the investigation.
<b>Church Bodies (Union, Conference, Division)</b>	If an allegation involves a Board Member, the appropriate person will be informed by the Regional Office or ADRA International once a credible allegation is received and at the end of an investigation.
<b>Safeguarding Focal Points and Complaint Officers</b>	If an office has a Safeguarding Focal Point, Complaint Officer, or someone serving a similar function, they should be involved in the initial report to the Country Director; support on reporting to any direct external donors, and partake in the corresponding risk and needs assessments.

When a report is received, available legal counsel should be notified and involved to maintain legal confidentiality.

**Note on Managing Anonymous Reports:**

- ▶ In circumstances where the complainant is anonymous, but the subject of the complaint and the agency where she or he works is known, the allegation will still be forwarded to that agency for follow-up in accordance with its investigation policy and procedures.
- ▶ In the event that the subject of the complaint (SOC) is unknown, but the complainant and the SOC’s agency is known, the allegation will be forwarded to that agency for follow-up.
- ▶ If the complainant is known, but neither the identity of the SOC or his/her employing agency is known, then the Safeguarding Office in conjunction with the reporting country office must decide whether the survivor may be interviewed in order to solicit more details about the allegation, keeping the best interest of the survivor as a priority and the need to minimize interviews in order to avoid re-traumatization and potential contamination of evidence.
- ▶ If neither the complainant, nor the identity of the SOC or his/her employing agency is known, then ADRA staff must decide on a safe and effective procedure to inquire with community members about misconduct “rumors.”



## Section Two

### Receiving Allegations of Sexual Harassment, Exploitation, and Abuse (SHEA)

**Part One:** This section is a simple guide on how to act when someone informs you of a suspected or experienced case of sexual misconduct.

Question	Action to be Taken
<b>What should I do if I have a suspicion of a SHEA case involving a person working in or with my ADRA office?</b>	Contact the Safeguarding Focal Point and Country Director. If I am unable to contact or do not trust the either, then I can directly contact my Regional Executive Director, the Safeguarding Office at ADRA International, or report via the Silent Whistle.
<b>What should I do if I suspect a beneficiary is in trouble related to a SHEA issue with an ADRA Representative?</b>	Contact the Safeguarding Focal Point and Country Director. If I am unable to contact or do not trust the Country Director, then I can directly contact my Regional Director, the Safeguarding Office at ADRA International, or report via the Silent Whistle.
<b>What should do if I have any information regarding a SHEA incident committed by an ADRA partner staff?</b>	Report it immediately and in a confidential way to the Safeguarding Focal Point and the Country Director. I do not report the complaint to the head of the partner organization or any other staff of the partner organization. I do not investigate by myself if the case is or not true.
<b>Should I wait to be certain that the things I have heard are real?</b>	You should not to wait until you are certain that there has been an abuse or exploitation. You are responsible as an ADRA Representative to prevent abuse; you must act (report) by announcing your doubts without waiting.
<b>What happens if the person making the claim does not immediately agree to do so on record?</b>	Support is still provided. The complainant must be reassured that nothing will be done without the approval of the victim or survivor. However, in special circumstances ADRA may initiate an investigation without the victim or survivor's consent, but nothing will be done that could put the individual(s) in danger.
<b>What kind of support will we provide to the victim or survivor?</b>	Victims and survivors will be referred to or receive any necessary health, psychosocial, legal, and security support deemed necessary. Support to victims and survivors cannot be brought without their consent and the consent of their legal guardian if a minor.
<b>If I hear a rumor or a complaint, should I investigate by myself to be certain the situation is truly happening?</b>	No, it is not your responsibility to determine whether the rumor or complaint is true. It is only your responsibility to report the concern.
<b>What should I do if the victim told me she / he doesn't want to tell the case to anyone else?</b>	You must report it anyway. Your report will always be done in the most strict, confidential, and sensitive way in any case. You will keep in mind that the situation is to be managed by the Safeguarding Office in an appropriate way with the victim's best interest in mind.
<b>What if I am requested to be part of an investigation team related to an allegation of child abuse or sexual exploitation and abuse?</b>	If there is no conflict of interest it is your responsibility as ADRA staff to be a part of the investigation team. Specific tasks will be given to you by the Investigation Manager that you will have to comply with in an appropriate and confidential manner.
<b>How I am going to manage the information I get through investigations, as member of investigation team?</b>	Act and collect the information according to the directives which are given to you by the Investigation Team exclusively. You would take no separate initiatives. You would report my action according to the modalities which will be specified to me by the Investigation Team.

## Section Two, *con't*

### **Part Two:** Behavioral and Conversation Tips for Receiving a Sensitive Complaint.

Every complainant, victim or survivor is going to react differently, and perhaps not in the manner that they thought they would react. Some may want contact, others not. Some will prefer to be alone, while some will need company to feel safe. Some might cry or be outwardly emotional, others might internalize their feelings and shut down. There is no right or wrong way to react to abuse, and it is important to reassure complainants, victims or survivors that how they react and how they are feeling is understandable and not abnormal.

When violence or abuse is reported to you, there are some key steps that you can take to ease the process and help reduce the trauma the complainant, victim, or survivor may be feeling. The following is a list of actions you can take if someone reports an incident to you:<sup>4</sup>

- ▶ **Location**
  - ▶ Find a discreet location in which to discuss the matter
- ▶ **Body Language**
  - ▶ Active listening without judgement or editing the survivor's narrative
  - ▶ Remain calm
- ▶ **Conversation Tips**
  - ▶ Be honest. Do not promise complete confidentiality (or any promises that you cannot keep). Explain that you may have to share their report with someone who will be able to help them.<sup>5</sup>
  - ▶ Open-ended questions that do not suggest blame or shame
  - ▶ Avoid asking too many questions. Ask only as many as are required to gain a clear understanding of the complaint, so that it can be passed on via ADRA's reporting procedures. Remember, it is not your job to investigate.
  - ▶ Make sure you are clear what the survivor said before you report it.
- ▶ **Reassurance**
  - ▶ Let the victim or survivor know they are not alone- by your presence and words
  - ▶ Tell them you believe them
  - ▶ Thank them for sharing what they have been through with you
  - ▶ Remind them that what happened is not their fault

<sup>4</sup> This section was taken from Megan Norbert's Report the Abuse (2017).

<sup>5</sup> Address issues of confidentiality, explaining that there are limits to ensuring confidentiality to the extent that staff members are obliged to report complaints, and that senior management must be informed of sensitive complaints. Reassure the survivor that information will only be shared on a "need-to-know" basis. It is possible that the subject of the complaint (SOC) will be informed of the allegations. If an investigation will be conducted, the SOC must be informed of the allegations.

## Section Two, *con't*

### ▶ Refer

- ▶ Ask what they need and help them obtain it
  - ▶ Make note of the victim's or survivor's safety needs
  - ▶ Make note of the victim or survivor's need for medical attention. Accompany them, if they desire and you are comfortable with this, to the doctor or other appointments.

### ▶ Inform

- ▶ Inform the victim or survivor of the next steps in the procedure, namely, that the matter will be reported to senior management at ADRA and appropriate steps will be taken.
- ▶ Make a written record of what has been said, using the Incident Reporting Form if possible. At a minimum, a record of the complaint should be filled out and submitted within 24 hours of the complaint, and it must be signed and dated by the person receiving the complaint.
- ▶ Maintain a level of confidentiality; only discuss the matter with those necessary to protect the victim or survivor, do not disclose unnecessary details.

Just as importantly, **never** do the following:

- ▶ Ask if they are sure or question the narrative of their experience;
- ▶ Express disbelief or support for the perpetrator's behavior or character;
- ▶ Suggest the survivor should feel shame for experiencing sexual violence;
- ▶ Suggest that reporting the incident will damage the survivor or perpetrator's life or career;
- ▶ Threaten to harm or retaliate against the survivor for reporting; and
- ▶ Assign fault or guilt to any parties.

**Note:** It is important to keep in mind that all of us, regardless of our background, carry some victim-blaming and rape myths within us. Reflecting on what we believe about how survivors of sexual violence should react or do is important to ensure that we do not impose these beliefs on others.

## Section Two, *con't*

**Note on Parental Involvement:** A specific issue relating to child survivors is whether or not to inform parents of the open complaint. Best practice generally dictates that parents (or guardians/caregivers) should be informed as they are in the best position to provide support and protection to the child. In some circumstances however, it may be in the best interest of the child not to inform the parents, e.g. where a parent is suspected of facilitating the SEA; the child could be subjected to retaliation, including physical or emotional abuse, expulsion from home, or have his/her well-being compromised.

## Section Three

### Reporting Allegations of Child Abuse

If you witness or suspect child abuse, or if a child discloses abuse to you, report the incident immediately to Emergency Services if the child is at risk of immediate and significant harm and these services won't place the child or their family at further harm. Otherwise, report to the Safeguarding Focal Point, Country Director, and line manager if appropriate.

Reporting mechanisms for child abuse follow similar reporting procedures as SHEA; however, the in-country response differs to protect the child.

If a child abuse incident report does not involve an ADRA Representative, then a localized child protection response should go into effect.

When violence or abuse is suspected, witnessed, or reported and involves a child, the following steps must be taken to ensure the safety of the child.

**Step One:** Put the child first. Remember, children have the same human rights as adults. Listen to children and make space for children's agency throughout this process. The child must be given all the information needed to make an informed decision using child-friendly techniques that encourage the child to express him/herself.

If a child reports an incident:

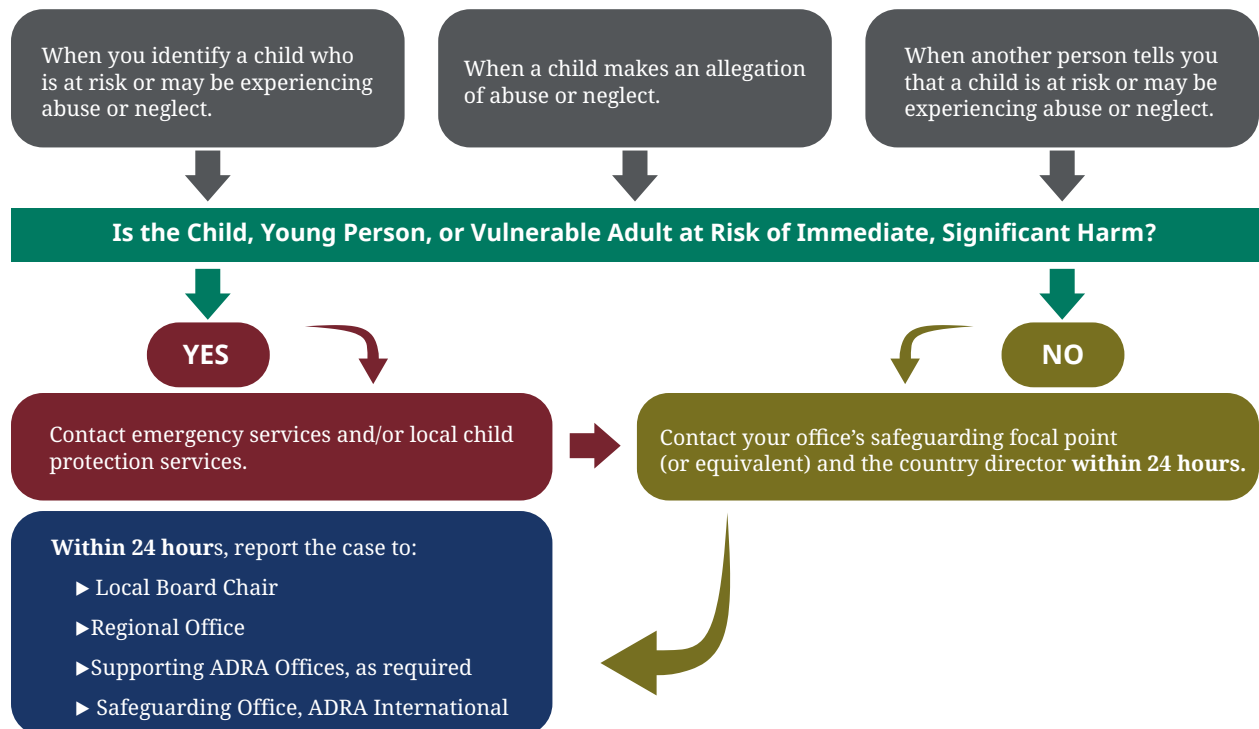
- ▶ Logistics
  - ▶ Listen to the child calmly and take the child seriously;
  - ▶ Never be alone with the child. If the child prefers to discuss the situation with one individual, ensure a secondary adult is in close vicinity;
  - ▶ Consider if the perpetrator of abuse is male or female when determining who will speak to the child;

**Section Three, *con't***

**Reporting Allegations of Child Abuse**

- ▶ Inform and Reassure
  - ▶ Reassure the child that he/she is not to blame;
  - ▶ Be honest;
  - ▶ Do not promise confidentiality; Explain that you may have to share his or her secret with someone who will be able to help them;
  - ▶ Inform the child of the steps you will take;
  - ▶ Tell the child you believe them and are glad that they told you; and
  - ▶ Don't blame parents.
- ▶ Follow-up<sup>6</sup>
  - ▶ Make sure you are clear about what the child says before you report it; To ensure trust and comfort of the child, do not write/ tape record information while speaking with the child.
  - ▶ When the child is no longer in your presence record what the child said in clear and accurate detail; and
  - ▶ Maintain a level of confidentiality; only discuss the matter with those necessary to protect the child, do not disclose unnecessary details.

**Step Two:** Assess and report the concern or incident.



<sup>6</sup> A child's ability to provide consent on the use of the information and the credibility of the information will depend on his/her age, maturity, and ability to express him/herself freely.



## Section Three, *con't*

**Step Three:** The Country Office will form a response team to manage the child's protection. The formulation of the team and its responsibilities are outlined in the table below.

	Immediate Response	Follow-up Actions
Step 1	<ul style="list-style-type: none"> <li>▶ Appropriate in-country program staff are immediately informed in a manner that protects the dignity, identity and safety of the child.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Form a Child Protection Team*; identify a dedicated case manager; and continue to support efforts to protect the child from further harm and to minimize risk of exposure, including exposure to media. All actions are taken in consultation with child and family.</li> </ul>
	<ul style="list-style-type: none"> <li>▶ Procedures are put in place to protect the identity of the child and the child's privacy at all times, including protection of family members, witnesses and care providers.</li> </ul>	<p>*The Child Protection Team may comprise of a local staff member with expertise in child protection, the Safeguarding Focal Point, a local representative from child-focused agency, relevant UNICEF staff, and a member of the Safeguarding Office.</p>
Step 2	<ul style="list-style-type: none"> <li>▶ An assessment is undertaken to determine the most appropriate response for the child, and a dedicated focal point identified for the case.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Follow up is ongoing with relevant partners, donors, and government authorities for accountability purposes. This will likely be managed by the Safeguarding Office with input from the Regional Office and relevant supporting ADRA Offices.</li> </ul>
	<ul style="list-style-type: none"> <li>▶ When required and determined to be in the best interests of the child, interviews or any engagement with the child is conducted by appropriate personnel trained in child interviewing techniques and protection procedures.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Support is provided to appropriate government and/or to implementing offices in provision of service response, including psychosocial support to maintain a safe and supportive environment for the child and family, in consultation with the Safeguarding Office.</li> </ul>
Step 3	<ul style="list-style-type: none"> <li>▶ At country level, response efforts are supported by the Child Protection Team, together with government authorities, and adapted to local context, including medical care and psychosocial support and counselling, as well as referral to independent legal counsel and other services. Parents or caregivers are informed and consulted from the onset.</li> </ul>	<ul style="list-style-type: none"> <li>▶ The Child Protection Team, together with appropriate national authorities, supports monthly follow up and reporting to monitor the wellbeing, safety and security of the child and family, and reports to the Safeguarding Office on the status of support provided.</li> <li>▶ The Child Protection Team works with relevant authorities so that all actions respect the key principles of justice for children in line with international standards and norms, and reports to Safeguarding Office on the status of investigations and judicial actions.</li> </ul>
	<ul style="list-style-type: none"> <li>▶ The Safeguarding Office follows up with the relevant Country Office engaging the Subject of the Complaint, regarding the investigation.</li> </ul>	<ul style="list-style-type: none"> <li>▶ The Communications Team at ADRA International and other relevant ADRA offices prepare proactive messaging on ADRA's actions to support appropriate national authorities and/or country offices to provide care and support, and to protect the dignity, identity, safety and security of child, family and caregivers.</li> </ul>
	<ul style="list-style-type: none"> <li>▶ A final report is submitted by the Child Protection Team to the Safeguarding Office, Regional Office, and supporting ADRA offices as required regarding the status of care provided.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Country Office, together with local authorities and partners, provide feedback to child and family on steps taken at every level of the response.</li> </ul>

## Section Four

### Whistleblowing Procedures

ADRA understands that there may be instances where a party may wish to make an anonymous report. In these circumstances, individuals can make ADRA-related reports through the anonymous whistleblowing mechanism of the Seventh-day Adventist Church. The Church uses a website called Silent Whistle. Complaints made through the Silent Whistle are received by the General Counsel at the General Conference of Seventh-Day Adventists. The General Counsel refers the complaint to the appropriate person within ADRA or its board and can communicate through the Silent Whistle with the complainant, while remaining anonymous. To use the Silent Whistle platform:

1. Connect to the Internet from a computer outside of work.
2. Type “[Adventist.Ethicspoint.com](https://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, the Silent Whistle can be reached by telephone at +1 888.373.7888. Further details about ADRA’s whistleblowing mechanisms can be found in the *ADRA Whistleblowing Policy*.

## Section Five

### Template of an Incident Reporting Form for the ADRA Safeguarding Framework Policies

#### What is the Incident Reporting Form?

In accordance with the ADRA Safeguarding Policies, all ADRA Representatives must report alleged sexual harassment, exploitation, and abuse (SHEA) and child abuse incidents when they occur by ADRA Representatives. This form is for offices or individuals (including ADRA staff and members of the affected population) to report an alleged incident to ADRA.

Please complete the form below and email to: [Protection@ADRA.org](mailto:Protection@ADRA.org). If you do not have email access, please telephone +1 302.680.5168 to report a safeguarding incident. If you require assistance in completing this form, please contact us by email or telephone.

## Section Five, *con't*

### **What is a safeguarding incident?**

The objective of safeguarding is to make ADRA a safe organization for its staff, the communities it works in, and for beneficiaries. Any concern that disrupts this idea potentially becomes a Section safeguarding incident. The Global Reporting Procedures should be used for allegations of sexual exploitation, abuse, and harassment; child abuse and maltreatment; and serious violations of the ADRA Code of Conduct and/or of the ADRA Safeguarding Framework. It may not always be obvious if a safeguarding incident relates to an ADRA program or activity. If in doubt, please still report.

### **What about the privacy of those included in this form?**

ADRA takes a survivor-centered approach to the reporting of alleged safeguarding incidents. Incidents should only be reported where it is safe to do so and should balance organizational responsibility with the survivor's wishes to report. Information that identifies individuals does not need to be reported.

ADRA may share the personal information provided in this form with the Safeguarding Office at ADRA International and other key staff members on a need to know basis. The information will be stored on ADRA International's server in a folder that is only accessible by the Safeguarding Office, Vice President for People and Culture, and the IT System Administrator.

### **Guidance for handling a disclosure or concern:**

- ▶ Take all complaints, allegations or suspicions seriously;
- ▶ Ensure the immediate safety of the person affected;
- ▶ Stay calm, offer support and reassurance to the person making the disclosure;
- ▶ Do not make any promises regarding confidentiality;
- ▶ Listen, keep questions to a minimum, make brief but careful notes and check the person affected agrees with them (where applicable); and
- ▶ Explain what you will do/what will happen next.



## Incident Report Form

Please provide as much information as possible in the following Incident Reporting Template:

### Victim or Survivor’s Details:

Name (if different from the complainant): \_\_\_\_\_

Sex: \_\_\_\_\_

Age Category: \_\_\_\_\_ Location of Residence: \_\_\_\_\_

- Adult
- Child (under 18)
- Unknown

Nationality, Language(s) Spoken: \_\_\_\_\_

Any disabilities/special needs?  
\_\_\_\_\_

If a minor, whose legal responsibility is this child (name, relationship):  
\_\_\_\_\_

Any other information about the survivor or his/her family background?  
\_\_\_\_\_

Best means of contact/preferred mean to be contacted (phone number, e-mail, WhatsApp, other):  
\_\_\_\_\_  
\_\_\_\_\_



## Incident Report Form

**Subject of the Complaint's Details:**

Name (if different from the complainant): \_\_\_\_\_

Sex: \_\_\_\_\_

Age Category:

Current Location: \_\_\_\_\_

- Adult
- Child (under 18)
- Unknown

Nationality, Language(s) Spoken: \_\_\_\_\_

Occupation/employment details: \_\_\_\_\_

Relationship to the alleged survivor: \_\_\_\_\_

Any disabilities/special needs? \_\_\_\_\_

Other information: \_\_\_\_\_

Best means of contact/preferred mean to be contacted (phone number, e-mail, WhatsApp, other):

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**Details of concern/abuse:** What, who, where, when (including the complainant’s own words if possible). Describe any sequence of events in chronological order if possible. Please list witnesses and their contact details when possible. Use additional or separate pages if necessary.

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**Supporting Material:** Register/note all materials that may need to be collected immediately to be safeguarded and/or protected.

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**Immediate Assistance**

<b>Fill out the Following:</b>	<b>Assistance Needed?</b> <i>If yes, provide details. If not, enter "Not Available".</i>	<b>Assistance Provided?</b> <i>If yes, provide details (service, provider, date, location etc.). Note if assistance is declined.</i>
<b>Medical Assistance</b>		
<b>Security and Protection</b>		
<b>Legal Assistance</b>		
<b>Other (Specify)</b>		

Response thus far and planning ahead (When Applicable)

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Who else knows about the allegation and this referral?

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Authorities (give names and positions if possible)

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Family members or other individuals (including ADRA Staff)

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Actions which have been taken so far, including those of ADRA, to respond to the case and/or to support the survivor (who, what, where, when):

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Name and contact details of the focal point in the country office to support a potential administrative safeguarding investigation:

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Current location and safety (including any immediate risks) of the survivor?

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Has any emergency medical intervention been needed/given? If yes- what, when and by whom?

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I confirm that I have, to the best of my knowledge and belief, informed the complainant of ADRA's responsibilities toward him/her, accurately registered the information s/he provided, collected and recorded the declarant/complainant's acknowledgment and consent.

This form has been completed by: \_\_\_\_\_ Date: \_\_\_\_\_

(Signature of Name and Position) \_\_\_\_\_

Submit this form completed to the best of your ability to [Protection@ADRA.org](mailto:Protection@ADRA.org), which is the confidential inbox of Brooke Feldman, Global Safeguarding Advisor, ADRA International (+1 301.680.5168; Skype: [Brooke.Feldman.ADRA@Outlook.com](https://www.skype.com/people/Brooke.Feldman.ADRA@Outlook.com)).

If the survivor or complainant are completing this form directly or through the assistance of an ADRA representative, please complete the following section.



## Informed Consent

### 1. Acknowledgment and Consent (To Be Completed by Declarer/Complainant)

- I understand the contents of this form, and all my questions have been answered.
- I confirm that all personal and other information provided by me is truthful, complete and accurate to the best of my knowledge.

I consent to share my personal information with (check all that apply):

- Medical professionals
- Social services professionals
- Host nation authorities
- National authorities of alleged perpetrator(s)
- International Criminal Court or other international tribunal
- I defer my decision regarding consent to share my personal information.
- I understand my decision regarding the consent may be overridden, under certain circumstances, by ADRA, and, should this occur, I will be informed.
- I do not consent to share my personal information, and understand that this refusal may limit the possibility for criminal accountability.

*Declarer/complainant signature or mark (thumbprint acceptable):* \_\_\_\_\_

*Representative signature or mark:* \_\_\_\_\_

*Date:* \_\_\_\_\_

Elects not to sign. Explanation, if provided \_\_\_\_\_

If you do not consent or if you have any concerns about how the personal information collected in this form will be used, disclosed or shared, you should notify the Safeguarding Office as soon as possible by emailing [Protection@ADRA.org](mailto:Protection@ADRA.org) or telephoning at +1 301.680.5168.

## Section Six

### Confidentiality and Protected Information

Specific measures must always be taken to safeguard confidentiality.

#### Information Storage

- ▶ If hard copies of complaint and referral forms exist, they should be stored in a locked cabinet at the country office, with access strictly limited.
- ▶ Electronic databases used to record and to track case information should have restricted access and persons with the access required must agree confidentiality undertakings in accordance with the Country Office's policies.

#### Personal Information

- ▶ The names of all parties to a complaint are confidential.
- ▶ The identity of the Subject of the Complaint must be protected, out of considerations of due process, fear of retaliation, and presumption of innocence.
- ▶ It is important that the name of the survivor (and the complainant if different from the survivor), not be released to the Subject of the Complaint without the survivor's consent.
- ▶ It is important that the name of the survivor (and the complainant if different from the survivor), not be released to the statutory authorities without the survivor's consent.
- ▶ When the survivor's identity is unknown, for various reasons, allegation referrals will still be made to the appropriate department in the concerned organization to determine if administrative follow-up or investigation is advisable.

## Annex I: Overview of the Administrative Safeguarding Investigation Process

### Overview of the Administrative Safeguarding Investigation Process

The **Safeguarding Office** will nominate someone to act as the lead investigator who will be in charge of the investigation on a day-to-day basis and will report to an Investigation Committee and others as required. A minimum of two investigators will be assigned to the case and investigations will start within ten days of receiving the credible allegation. The Safeguarding Office has the authority to appoint other experts to conduct the investigation where necessary.

## **Annex I: Overview of the Administrative Safeguarding Investigation Process, *con't***

The Terms of Reference will be agreed upon by the Investigation Committee before the start of the actual investigation, which will include:

- ▶ Investigation objectives;
- ▶ Scope of the investigation;
- ▶ Method of investigation;
- ▶ Initial resources; and
- ▶ Initial timescale.

When the investigators arrive at a local office they will brief the Country Director on how they intend to take forward the investigation unless the Country Director or Board are the subject of the investigation, in which case their line manager (i.e. Regional Director) will be briefed. All members of staff must make themselves available to the investigation team (whether the Safeguarding Office, Human Resources or external investigators).

The matters investigated will be kept confidential in so far as this does not hinder or frustrate the investigation process. If any member of staff deliberately withholds any information or misleads the investigators, this could be considered a disciplinary offence.

As part of the investigation, any relevant supporting documentation should be identified and seized. This will almost always include specific supporting personnel information such as recruitment and performance management documents. It can also include emails containing evidence that abuse has been sent or received via the internet or other technologies.

Interviews should be attended by two of the assigned investigators, the interviewee, and a representative chosen by the interviewee themselves (if a minor and if they wish). Interview notes should be prepared as soon after the meeting as possible.

On completion of the investigation, the investigators will prepare a detailed report for the Investigation Committee which will include:

- ▶ The specific nature and extent of the concerns
- ▶ Investigation background
- ▶ A chronology of events
- ▶ Key Investigation findings and analysis
- ▶ Recommendations
- ▶ Appendices: Transcripts of interviews and relevant documentary evidence

## **Annex I: Overview of the Administrative Safeguarding Investigation Process, *con't***

The report will be presented to an Investigation Committee for decision making as soon as possible after the investigation and to instigate appropriate sanctions. These may include criminal proceedings (if not already referred) and disciplinary action.

Following the completion of the investigation evidence should be held securely in accordance with data protection and security policies and laws at ADRA International and comply with local data protection laws for Investigation Committee members receiving the report.