

ADRA Safeguarding Policy

| ADRA Network Policies and Procedures | | | | | |
|--------------------------------------|---------------------|--|-----------------------------|---------------|----------------|
| Version | Approving Committee | Department | Point Person | Revision Date | Effective Date |
| 1.0 | NetCom | ADRA International Safeguarding Office | Global Safeguarding Officer | Every 3 years | 23 June 2020 |

Table of Contents

1. Definitions 3

2. Understanding Safeguarding 3

3. Purpose..... 4

4. Scope 4

5. Policy Statement 5

6. Safeguarding Principles..... 7

7. Safeguarding Risk Assessments..... 10

8. Reporting Concerns..... 10

9. Responding to Concerns 11

10. Disciplinary Consequences..... 12

11. Implementation and Monitoring 13

Definitions

| Term | 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 means providing a working environment free from abuse and harm to anyone who works with and comes into contact with ADRA Representatives and ADRA projects. |

Understanding Safeguarding

What is Safeguarding?

Safeguarding means taking all reasonable steps to prevent harm and abuse; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm and abuse occur. This applies to the safety and welfare of people involved in the delivery or receipt of humanitarian aid and development assistance.¹

What is Safeguarding at ADRA?

Safeguarding is a term used to denote the duties and responsibilities that those representing ADRA must carry out to protect the vulnerable individuals that we work with and for from potential harm that may arise due to ADRA's presence and activities and our obligation to respond in a just manner when harm and abuse do occur.

¹This definition was adapted from a definition published by Bond Alliance.

Purpose

ADRA recognizes that exploitation and abuse are prevalent throughout the world and in all societies. People may be more vulnerable or at risk of harm due to gender, age, ethnicity, political affiliation, religious association, sexual orientation, and physical abilities. As a development and relief agency whose work is underpinned by the Seventh-day Adventist Church, ADRA is committed to ensuring that anyone who comes into contact with the organization is treated with respect and dignity regardless of their diversities.

This *Safeguarding Policy* outlines ADRA's commitment to the protection of its representatives and the populations it supports. This Policy will help uphold ADRA's purpose statement to "serve humanity as God intended" and should be integrated across all ADRA offices in policies, practices, programs, and people.

Specifically, this policy aims to ensure that:

- ▶ ADRA has procedures in place to promote 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, security, or protection concerns perpetrated by someone who does not represent ADRA.

Scope

As a network approved policy, the *Safeguarding Policy* applies to:

- a. ADRA International and all ADRA regional offices, country offices, field offices, and any project locations;
- b. All offices that wish to remain compliant with ADRA Accreditation and Licensing Standards;
- c. All other entities that agree to be bound by ADRA policies; and
- d. All ADRA Representatives.

Scope, con't

ADRA Representatives represent the organization at all times. Poor behavior in and outside of office hours undermines ADRA's work and values. Thus, the *Safeguarding Policy* applies to all ADRA Representatives 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.²

This Policy will automatically be applied in the same country and in all geographies where the ADRA Country Office is funding projects and must be used in conjunction with the ADRA Safeguarding Framework Implementation Standards.

All ADRA entities shall enact their own procedures which must follow this and other network policies. ADRA will comply with laws and regulations prohibiting misconduct, but where this Policy exceeds any legal requirements, ADRA will adhere to the standards in this Policy to the extent allowed by applicable law. Where required by law or locally practiced, ADRA offices may enhance the standards and requirements set out in this Policy but cannot change the Policy in itself.

Policy Statement

ADRA believes everyone regardless of age, gender, disability, ethnic origin, or other diversities has a right to be protected from all forms of harm and abuse, including harassment, bullying, and exploitation. ADRA 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. This *Safeguarding Policy* affirms ADRA's commitment to protect its representatives and beneficiaries from the risks of violence, sexual exploitation, and all other forms of harm and abuse that it may create with its presence and activities.

ADRA 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.

Anyone who comes into contact with ADRA as a result of our activities must be safeguarded to the maximum possible extent from deliberate or inadvertent actions and failings that place them at risk of abuse, exploitation, injury, and any other harm.

²These standards are listed in the *ADRA Code of Conduct* and the *Safeguarding Code of Conduct*.

Policy Statement, *con't*

ADRA will work tirelessly to ensure that all who engage with us understand and are supported in their responsibilities to meet our safeguarding roles and responsibilities. This commitment includes ADRA's commitment to work with organizations (including partners, vendors, and suppliers) who are equally committed to the dignity of individuals and equally vigilant to preventing and addressing abuse and exploitation.

All forms of toxic environments, harm, and violence are never acceptable. ADRA will challenge and not tolerate inequality, discrimination or exclusion. ADRA will maintain a zero-tolerance approach to inaction. Zero tolerance to inaction means acting on every allegation in a fair and reasonable way with due regard for procedural fairness. It also includes zero tolerance to inaction of ADRA Representatives who do not report an alleged violation. Protection is paramount to any competing needs and conflicts of interest.

When a safeguarding claim is substantiated against an ADRA Representative, the office in which the misconduct occurred, ADRA International, ADRA Regional Offices, and any other relevant ADRA offices will do all that is practically feasible to provide confidential assistance and support to victims and survivors, take appropriate actions towards subjects of complaint, and at the very minimum will ensure that individuals are at no further risk of experiencing that same harm.

To remain compliant with this Policy, ADRA 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'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 implementation 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 all of its safeguarding work.³ 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 programs.

3. Inclusive and Empowering

All people should be empowered and encouraged to fulfil their potential. 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. On a local level, ADRA offices should involve affected populations in the development of safeguarding measures in accordance with their age, gender, abilities, and evolving capacities. Individuals should be encouraged to express their views. This principle extends to victims and survivors of abuse, who should be actively involved in their own protection by making their well-being, dignity, preferences and support a priority.

³Safeguarding is an approach that places people and accountability at the center and must be integrated into everything ADRA does.

Safeguarding Principles, *con't*

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 representing ADRA has a responsibility to safeguard- including where external partners are part of delivery. Individuals or organizations that are associated with ADRA must take their safeguarding responsibilities seriously and uphold the principles of the Policy. Therefore, 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.

7. Open and Accountable, *con't*

| At a minimum, beneficiaries have the right to know: | At a minimum, ADRA Representatives have the right to know: |
|--|---|
| The expected standards of conduct that ADRA representatives must abide by; | About their engagement/employment through an onboarding and orientation process; |
| Clear information and updates about ADRA activities, including transparency on funding sources, beneficiary selection criteria and how they will be involved; | The policies, procedures and benefits that are directly relevant to them (policies, handbook, standard operating procedures etc.) |
| How to access or request additional information if desired; | How to access necessary support; |
| To refuse any bribes and not engage in any fraudulent activities; | The expected standards of conduct when you represent ADRA; |
| The right to humanitarian assistance without being subjected to SHEA; | Understand and have access to the policy and procedures associated with safeguarding; |
| Where and how to report sexual harassment, exploitation, and abuse (SHEA) incidents; | 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; |
| What to expect after making a complaint, including potential referrals, timeframes, and the roles, responsibilities, and any limitations of actors involved; and | Access to support mechanisms including counselling support; |
| What steps ADRA will take to ensure safety and confidentiality. | Access and knowledge of complaints mechanisms. |

8. Governance and Accountability

The local ADRA 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

To remain compliant with this Policy, ADRA must exercise 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.⁴

- ▶ **Network:** NetCom and ADRA International are responsible for maintaining a risk assessment that identifies risks pertaining to intra-network coordination, such as recruitment, the emergency management unit, and external reporting.
- ▶ **Operational:** Each ADRA Country Office 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:** Within programming approaches, program teams must assess the level of risk for negative impacts occurring and adapt the program design and implement prevention strategies accordingly. This is particularly crucial in humanitarian settings.
- ▶ **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.

Risk and decision-making processes and documents will reflect these assessments. Again, this does not need to be a standalone procedure, and should be incorporated into existing activity planning and risk management processes.

Reporting Safeguarding Concerns

Conduct that undermines the 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 is occurring within a project, should report it through existing project and office-level complaint and feedback mechanisms.

If the complaint relates to an incident in the workplace, such as bullying and harassment by a supervisor, it should be reported through the channels outlined in ADRA (Country Office) Complaints Policy and the Conflict Resolution and Grievance Procedures.

⁴ Tools for safeguarding risk management are located in the Safeguarding Implementation Toolkit on ENet: [Operational Risk Management](#), [Program Risk Management](#), and [Partner Risk Management](#).

Reporting Safeguarding Concerns, *con't*

If the complaint or concern is sensitive (relating to sexual misconduct, child safeguarding, or other forms of serious harm), then it should be reported directly to the Country Director and any Safeguarding Focal Point (or a similar position if it exists) within 24 hours or as soon as possible.

If an individual is in imminent danger of serious harm, the staff member should immediately call emergency services, such as the police, before reporting it to ADRA.

The Country Director and the Safeguarding Focal Point must then inform their Board Chair, Regional Office, relevant ADRA supporting offices if applicable, and the Safeguarding Office at ADRA International within the following 24 hours.

The Safeguarding 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 Officer, they should report to at least of the following within 24 hours or as soon as possible:

- ▶ Regional Director at their Regional Office;
- ▶ Board Chair or the local ADRA Board;
- ▶ ADRA's Safeguarding Office Protection@adra.org or +1 301.680.5168; or
- ▶ ADRA international's whistle blowing platform Adventist.Ethicspoint.com or +1 877.874.8416.

For cases which involve a representative of another organization, the Safeguarding Office or the local Safeguarding Focal Point and/or the Country Director will refer the allegations to the proper focal point within that organization, ideally following interagency protocol.

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

Where concerns exist about the conduct of ADRA Representatives or where there has been a breach of the Safeguarding Policy, a case-by-case determination will be made by the Safeguarding Office with relevant stakeholders, taking into account all relevant factors, as to whether the particular concern comes within the scope of this Policy. When appropriate, an administrative safeguarding investigation will be conducted and possible referral to statutory authorities for

Responding to Safeguarding Concerns, *con't*

criminal investigation under the law of the country in which they work; and/or by ADRA in accordance with disciplinary procedures. ADRA Offices are obliged to support the administrative safeguarding investigation process and any reporting requirements.

Disciplinary Consequences for Violating this Policy

Any substantiated violation of the *Safeguarding Policy*, *the Safeguarding Code of Conduct*, and *the ADRA Code of Conduct* will be considered an act of gross misconduct and cause for termination. 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.

Breaches of this Policy and failure to comply with these responsibilities may incur the following sanctions:

- ▶ For ADRA Staff and Interns—disciplinary action leading to possible termination.⁵
- ▶ For ADRA Contractors, Volunteers, Visitors, and Third Parties (individuals, service providers/vendors, and implementing partners)—up to and including termination of all relations including contractual and partnership agreements with ADRA.
- ▶ For ADRA Offices that do not comply with the administrative safeguarding investigation process and/or do not comply with the findings and recommendations, ADRA International reserves the right to inform relevant internal stakeholders (e.g. ADRA supporting offices, Regional Offices, Seventh-day Adventist Church in the respective region, et cetera), and may result in removal of the office’s ADRA Accreditation License (AAL).
- ▶ Where relevant—appropriate legal or other such actions.

Implementation and Monitoring

To comply with the ADRA 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.

Local boards are ultimately accountable for this Policy; while the President of ADRA International, Regional Directors, and Country Directors are responsible for its implementation.

⁵ ADRA employees can resign while an investigation is ongoing; however, the investigation will be carried out until a completed. If an allegation about an employee is substantiated, ADRA will not accept the employee’s resignation request and will instead respond with the disciplinary action recommended by the Investigation Committee.

Implementation and Monitoring, *cont*

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 network Policy will be reviewed by the Safeguarding Office in consultation with NetCom at a minimum every three years or earlier if significant changes are required. This review will ensure that this Policy is overseen and in accordance with the other ADRA Safeguarding Framework Policies, procedures and guidance.