

ADRA Whistleblowing Policy

ADRA Network Policies and Procedures					
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Table of Contents

1. Definitions	3
2. Purpose.....	4
3. Scope	4
4. Policy Statement	5
5. Principles	6
6. Implementation	6
7. Reporting Mechanisms	7
8. Receiving and Referring Disclosures.....	9
9. Investigations	11
10. Protections Against Retaliation	12
11. Reporting Retaliation	13
12. Appeal Process	15
13. Annexes.....	15
a. Additional Definitions.....	15
b. Incident Reporting Form, Template.....	16
c. Instructions on the Risk Assessment Code (RAC).....	19
d. Acknowledgments.....	20

Introduction

Achieving ADRA’s purpose of serving “humanity so that all may live as God intended” requires all of us to perform with the highest personal and professional ethical conduct. The culture we strive to create at ADRA requires caring deeply and recognizing that every voice matters.

ADRA encourages everyone to report any incidents of behavior which are unlawful or breach ADRA’s Code of Conduct. While this is a responsibility for all ADRA Representatives, we acknowledge that in some circumstances, considerable courage is needed to speak out about wrongdoing.

This Policy serves as a guide for individuals who have specific concerns that an ADRA Representative’s commitment to ethical conduct may be at risk. It addresses how individuals can report specific concerns, how ADRA will address reports, and the protections against retaliation for reporting.

Definitions

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

Whistleblowing: The deliberate and voluntary disclosure of misconduct by ADRA or for which ADRA is accountable (e.g. misconduct by a staff member, volunteer, partner or supplier). The disclosure or attempted disclosure can be by any stakeholder within or outside the network and may be anonymous. The disclosure could be through access to the data, events, files or any other information about an actual, suspected or anticipated wrongdoing within ADRA.

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

- ▶ A criminal offence or illegal activity (including fraudulent and corrupt behavior, e.g. theft, fraud¹);
- ▶ A child safeguarding incident;
- ▶ Sexual exploitation, sexual abuse, or sexual harassment;
- ▶ A miscarriage of justice;

¹ Financial wrongdoing may also include the following examples but not be limited to “side deals” or “under the table” dealings with contractors for personal benefit; receiving personal kickbacks or significant gifts from contractors or vendors which could create bias in the tendering process.

Definitions, *con't*

Whistleblowing Event: *con't*

- ▶ An act creating risk to health and safety of persons or the environment (not including dangers that are normally part of an employee's job);
- ▶ Gross mismanagement, including mismanaging public funds or a public asset (government property);
- ▶ Knowingly directing or advising someone to commit any wrongdoing described above;
- ▶ A breach of any other legal obligation;
- ▶ Concealment of any of the above; or
- ▶ Any attempt to prevent an individual from raising their concerns.²

Purpose

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

ADRA's intention through this Policy is to ensure that it is always safe to report malpractice, without fear of retribution, and that individuals can have confidence that their concerns will be properly investigated and resolved in a timely manner.

The purpose of this Policy is NOT:

- ▶ Intended to address general complaints about the workplace, interpersonal issues, or other issues not related to safeguarding violations. General complaints should be raised with managers or through other mechanisms as described in the ADRA Office's HR Manual or *Grievance Policy*.
- ▶ Intended to address general complaints about project activities or staff behavior from beneficiaries. These complaints should be raised through localized complaint and response mechanisms.
- ▶ This Policy cannot be used to challenge formal outcomes as per other ADRA policies.

Scope of the ADRA Whistleblowing Policy

As a network approved policy, the *Whistleblowing 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;

² It will not always be clear that a particular situation falls within one of these categories and you will need to use your own judgment to decide whether an issue of concern amounts to suspected malpractice. You are also encouraged to report other types of wrongdoing such as accepting gifts which are intended to influence decision making and deliberate disregard or serious breach of ADRA's Code of Ethics.

Scope of the ADRA Whistleblowing Policy, *con't*

As a network approved policy, the *Whistleblowing Policy* applies to: *con't*

- c. All other entities that agree to be bound by ADRA policies;
- d. All permanent, temporary, and part-time staff; board members; interns; volunteers; ADRA visitors (including media); contractors and consultants; and sub-grantees (local implementing partners and service providers) must also comply with the *Safeguarding Policy*. This group will be referred to as “ADRA Representatives” throughout the Policy.

This policy will automatically be applied in the same country and in all geographies where the ADRA Country Office is funding projects.

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

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

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

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

Principles

ADRA's values of being connected, courageous, and compassionate along with ADRA's Operating Principles form the foundation for this Policy. These values and principles guide the implementation of the *Safeguarding Whistleblowing Policy* through the additional principles of:³

- ▶ **Accountability:** of ADRA for the actions of its staff, volunteers, suppliers and partners;
- ▶ **Fairness:** in terms of how those representing ADRA treat one another and in the process of reporting and investigating a suspected Whistleblowing Event;
- ▶ **Openness and transparency:** ADRA is committed to being open and transparent. This Policy ensures that all employees and volunteers have the opportunity to report any suspected Whistleblowing Event; and
- ▶ **Protection:** for whistle-blowers from dismissal, victimization, or reprisal following a disclosure.
- ▶ **Confidentiality:** The identity of persons disclosing wrongdoings and of others involved in the disclosure process, as well as the confidentiality of any information collected, will be protected to the fullest extent possible.

Implementation

Local boards of ADRA Offices are ultimately responsible for this policy.

Presidents, Executive Directors, and Country Directors are ultimately responsible for operationalizing this Policy, which includes the dissemination, training, and sensitization of this Policy within all office locations. Additionally, they are responsible for ensuring that all complaints in their country or region are properly reported and that these whistleblowers are not retaliated against.

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

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

³ ADRA Operating Principles are located within the ADRA Network HR Handbook Version 2.1.

Implementation, *cont*

ADRA Country Offices are permitted to have their own whistleblowing platform and policy. These must also include the network *Whistleblowing Policy* within the country's procedures and sensitize staff to this option. If staff do not feel comfortable reporting within their country's whistleblowing platform, when a member of senior management is involved in the allegation for instance, they may use ADRA International's Silent Whistle.

When to report and when to not report?

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

Mechanisms to Report Whistleblowing Events

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

Confidentiality is assumed unless the complainant agrees that his/her identity may be revealed.⁴ The identity of the individual(s) reporting misconduct should remain confidential to the maximum extent possible, as should all communication with ADRA staff members in question relating to the report.

Reporting misconduct through established internal mechanisms

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

- ▶ Line managers, human resources manager, the head of the office, local board, or region concerned;
- ▶ An individual within a country office such as a Complaint Officer or a Safeguarding Focal Point appointed to receive sensitive reports;
- ▶ Country-level whistle blowing mechanisms (not the Silent Whistle); or the
- ▶ Safeguarding Office at ADRA International Protection@ADRA.org

⁴ In respect of allegations of child abuse or sexual exploitation and abuse, it is important to remember that the best interests of the child and/or survivor are paramount. Any allegation should be reported confidentially to the appropriate individual, since any breach of confidentiality outside of the reporting lines could have devastating effects on the life of the child and/or survivor and his/her family.

Mechanisms to Report Whistleblowing Events, *con't*

a. Reporting misconduct through established internal mechanisms, *con't*

For those further reporting whistleblowing disclosures, a sample template of the information that is helpful to investigate complaints is found in Annex II. Internal complainants may also follow the reporting mechanisms described in the **ADRA Global Procedures to Receive and Report Sensitive Complaints**.

b. Reporting misconduct through the General Conference of the Seventh-day Adventist Church:

Individuals can anonymously make ADRA-related complaints through the whistleblowing mechanism of the Seventh-day Adventist Church. The Seventh-day Adventist Church uses a website called Silent Whistle. Complaints made about ADRA through the Silent Whistle are received by the Office of General Counsel at the General Conference of Seventh-Day Adventists and referred to the appropriate person within ADRA International or its board. The Office of the General Counsel can communicate through the Silent Whistle with the complainant, regardless if the complaint was made anonymously or not. To use the Silent Whistle platform, the instructions are as follows:

1. Connect to the Internet from a computer outside of work.
2. Type "[Adventist.Ethicspoint.com](https://www.adventistethicspoint.com)" into the address bar and hit "Enter."
3. Select the location where the violation took place. Select "ADRA."
4. Follow the prompts to file your complaint.

Alternatively, you can call +1 877.874.8416, which is an English-language, toll-free line in the United States.

c. Reporting misconduct through external mechanisms:

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

Mechanisms to Report Whistleblowing Events, *con't*

c. Reporting misconduct through external mechanisms: *con't*

ADRA will not require its staff to sign or comply with internal confidentiality agreements or statements that prohibit or otherwise restrict staff from lawfully reporting waste, fraud, or abuse to a designated investigative or law enforcement representative of a department or agency authorized to receive such information. ADRA strongly advises that you seek advice from Public Concern at Work before reporting your concerns externally.⁵

Note on Anonymous Disclosure and Confidentiality

Proper investigation may be more difficult or even impossible without having direct access to the individual who initially raised the concern. It is recommended to disclose your identity if possible. The more information that you can provide, the easier it is for ADRA to progress our investigations.

If you do wish to make a verbal disclosure and remain anonymous, ADRA will take reasonable steps to keep your identity secret but does not guarantee your anonymity, including because there may be circumstances when you may be needed as a witness (for example, if your report becomes the subject of a criminal investigation). Should this be the case, ADRA will seek to discuss the matter with you at the earliest opportunity.

Nevertheless, ADRA will investigate all credible concerns that are raised, even if they are raised anonymously.

Receiving and Referring Whistleblowing Disclosures:

The whistleblower can disclose improper activity as part of normal reporting activity to their manager or designated person in their office to receive serious complaints in a manner which maintains confidentiality, if desired. The person receiving the complaint will ensure that a written submission of the whistleblowing disclosure is submitted to the Country Director, the Board Chair, or the Regional Office.

- a. The senior most recipient of the whistleblowing complaint, if not within ADRA International, must decide if, where, and when it is referred onwards based on the **Risk Assessment Code** below.

⁵ Public Concern at Work is an independent charity which can provide independent advice at any stage. Public Concern at Work can be contacted online at www.pcaw.co.uk; whistleblowing.org.uk; or by telephone on 020.7404.6609.



Receiving and Referring Whistleblowing Disclosures: *con't*

Risk Assessment Code	Resolution Location and Timeframe for Whistleblowing and Grievance Policies
<p>Catastrophic</p> <p>Presents an immediate danger to life, health, property, or infrastructure and requires emergency correction or control of the hazard to a lower level of risk. Any allegation of child abuse or sexual exploitation and abuse that involves an ADRA Representative.</p>	<p>Notify ADRA International, the Regional Office, and any supporting ADRA office which has a connection to the incident within 24 hours.</p>
<p>Critical</p> <p>Represents high level of threat to life, health, property, or infrastructure and requires hazard correction or control of the hazard to lower risk as soon as possible.</p>	<p>Notify the Regional Office and any supporting ADRA office which has a connection to the incident within 1 week.</p>
<p>Significant</p> <p>Represents a medium level of risk to life, health, property or infrastructure, with correction planned and completed, or hazard controlled to a lower risk.</p>	<p>Notify the Regional Office and any supporting ADRA office which has a connection to the incident within 2 weeks.</p>
<p>Minor</p> <p>Represents a low level of risk, with correction planned and completed, or hazard controlled to a lower risk.</p>	<p>Notify the Safeguarding Focal Point (Complaint Officer or similar position) and/or the Country Director or Board Chairperson within 3 weeks.</p>

Note: The RAC is explained further in Annex III.

- b. If a formal disclosure has been made to ADRA International or through the Silent Whistle, the person initially receiving the disclosure will:
1. Refer the complaint to the appropriate person or body within 48 hours of receipt.
 2. Acknowledge the receipt in writing within 5 business days (if the identity and contact information is provided and the disclosure is not through the Silent Whistle).
 3. Determine whether the disclosure merits an investigation using within 10 business days of receiving the complaint, and relay that decision, in writing, to the individual who made the disclosure. In the case of anonymous disclosure, the Appropriate Person must follow the same timeline from the date a formal disclosure is received.
 4. Where assessment of the whistleblowing disclosure reveals the need for an investigation, the Appropriate Person will appoint a person to carry out the investigation (known henceforth as the investigation team).

Receiving and Referring Whistleblowing Disclosures: *con't*

- b. If a formal disclosure has been made to ADRA International or through the Silent Whistle, the person initially receiving the disclosure will: *con't*
 - 5. If the reported activity is outside the scope of this Policy, the Appropriate Person should bring this to their governing committee (e.g. such as ADCOM), who will direct it to the appropriate authority (e.g. police).

Investigations into Whistleblowing Disclosures

All ADRA offices and staff members are required to cooperate with investigations and provide access to all records and documents requested by the investigation team.⁶ Anyone called upon to assist with the investigation will have a duty to keep the investigation and information provided confidential.

ADRA will aim to keep the whistleblower broadly informed of the progress of the investigation and its likely timescale, when appropriate and relevant. Any information shared with the whistleblower about the investigation will be deemed as confidential.

Specific investigation procedures will vary based on the nature of the complaint. The outline of different procedures can be found in the *relevant policy*.

At the conclusion of the investigation, the investigation team will provide a final written report within 90 days to the Appropriate Person and/or Investigation Committee setting out the findings of the investigation and recommending any remedial steps to be taken.

- ▶ The investigation report will likely include gathered evidence, be anonymized to protect the witnesses, who will have the opportunity to respond during the investigation, and include the subject of complaint's defense to the allegations.
- ▶ Investigation reports (redactions allowed) about substantiated allegations that involve individuals who could pose a risk to the network must be shared electronically with ADRA International. Copies of the investigation reports will be maintained in electronic forms indefinitely by the offices that received the complaint and commissioned the investigation. Copies of the investigation reports will also be included in the relevant employee files.

The Appropriate Persons and/or the Investigation Committee will advocate for specific proposed actions and ensure they are followed through. They will also review and act on organizational learning from the issues raised. If applicable, they will also inform relevant internal stakeholders and external bodies.

⁶ The exception to this is medical records, which will not be made available unless expressed consent of the staff member concerned.

Investigations into Whistleblowing Disclosures, *con't*

ADRA International reserves the right to inform internal and external stakeholders (e.g. donors, the Seventh-day Adventist Church in the region) of ADRA offices that do not comply with the investigation process and/or do not comply with the findings and recommendations. Furthermore, this may result in removal of the office's ADRA Accreditation License (AAL).

While ADRA cannot guarantee that it will respond to disclosures in the way that complainants might wish, ADRA will try to handle the matter fairly and properly. If complainants are unhappy with the outcome of the investigation, or with the way the investigation is handled, ADRA prefers that complainants submit another report explaining why this is the case. Concerns will be investigated again if there is good reason to do so.

Protections Against Retaliation

- a. All ADRA staff members have a duty to report any breach of ADRA's policies and procedures to officials whose responsibility it is to take appropriate action. An individual who makes such a report in good faith has the right to be protected against retaliation.
- b. ADRA staff and local boards are obliged to cooperate with duly authorized audits, investigations, and other oversight activities. An individual who does so, has the right to be protected against retaliation.
- c. If an ADRA Representative (including board members) tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, ADRA will treat this as a serious disciplinary offence and may result in termination for cause, which will be investigated in accordance with ADRA's investigation and disciplinary procedures or in accordance with the relevant organization.
- d. Retaliation against individuals who have reported or provided information concerning acts of misconduct, or who have cooperated with audits or investigations or other oversight activities is prohibited. Such behavior violates the fundamental obligation of all staff members and boards to uphold the highest standards of efficiency, competence and integrity to complete their functions and regulate their conduct with the best interest of ADRA in view.
- e. Retaliation against outside parties is prohibited. Any retaliatory measures (including threats) against a contractor or its employees or any other individual engaged with ADRA because such a person has reported misconduct by ADRA staff will be considered misconduct that, if established, will lead to administrative and/or disciplinary action.

Reporting Retaliation

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

Similarly, if someone within the organization has asked you to redact your complaint or tried to stop you from reporting, please contact an administrator at ADRA International. You can report in your language of choice; ADRA will manage necessary translations. This should be done promptly and, in any event, no later than 6 months after the alleged act or threat of retaliation has occurred.

Contact information for ADRA International

Email: Protection@ADRA.org

Telephone: +1 800.424.ADRA (2372) (toll-free number in the United States)

ADRA International

12501 Old Columbia Pike
Silver Spring, MD 20904, USA

The role of an administrator at ADRA International with respect to protection against retaliation for reporting misconduct are as follows:

1. To receive complaints of retaliation;
2. To keep a confidential record of all such complaints;
3. To do an initial review of the complaint if:
 - ▶ The complainant engaged in a protected activity;
 - ▶ The action alleged to be retaliatory or a threat of retaliation did take place; and
 - ▶ There is a prima facie case that the protected activity was a contributing factor in causing the action alleged to be retaliatory or a threat of retaliation.
4. Refer the complaint, if necessary, to the Appropriate Person.

Once the Appropriate Person has received a complaint of retaliation, the following steps should occur:

1. Where the complainant can be contacted, the Appropriate Person will send an acknowledgement of the complaint promptly upon having received it.

Once the Appropriate Person has received a complaint of retaliation, the following steps should occur: *con't*

Reporting Retaliation, *con't*

2. The Appropriate Person will complete the initial review within 30 days of receiving the complaint of retaliation. If, in the opinion of the Appropriate Person (or the Board Chair), there is a credible case of retaliation or threat of retaliation, the matter will be recommended for an investigation to the appropriate governing entity and will immediately notify in writing the complainant that the matter has been referred.
 - a. If the Appropriate Person does not formally consider the complaint within 30 days, the staff member may then refer the matter in writing to the President of ADRA International.
 - b. If following a final determination by the Appropriate Person of a matter referred to it by a staff member, the staff member wishes to have the matter reviewed further, he/she may refer to the Board Chair in writing. The Board Chair may undertake his/her own independent review of the matter and provide a report to the President of ADRA.
3. Pending the completion of the review, the person leading the review may recommend that the President or another senior member of ADRA take appropriate measures to safeguard the interests of the complainant, including but not limited to temporary suspension of implementation of the action reported as retaliatory and, in consultation with the complainant, temporary assignment of the complainant or placement of the complainant on special leave with full pay.
4. ADRA will seek to complete investigations and submit its report to the relevant individual/s within 45 days. Once the investigation report is complete, the Appropriate Person will collectively review and inform the complainant of the outcome of the investigation in writing and make its recommendations on the case to the President. Such recommendations may include disciplinary actions to be taken against the retaliator.
5. If the Appropriate Person finds that there is no credible case of retaliation or threat of retaliation, but finds there is an interpersonal problem within a particular office, the Appropriate Person will advise the complainant of the existence of alternative mechanisms of conflict resolution within ADRA.
6. Where, in the opinion of the Appropriate Person and/or the complainant, there may be a conflict of interest in the individual or entity conducting the investigation, it is recommended that the complaint be referred to an external investigating mechanism.

Appealing Investigation Results

ADRA Representatives (current and former) may appeal the finding and/or the disciplinary measure imposed.

- ▶ The complainant must request an appeal within five working days of receiving official notice of the investigation's finding and/or disciplinary action. The appeal shall contain a clear and concise statement of why they appeal the finding or find the disciplinary action inappropriate.
- ▶ The supervisory body receiving the appeal must seriously consider the appeal, preferably informing the Investigation Committee and allowing them to decide and respond to the complainant with their decision or plan of action within ten working days of the date of the received appeal unless extended for good cause.

Annex I: Additional Definitions

Beneficiaries: ADRA uses a broad, working definition of 'beneficiary' to include not only direct beneficiaries of a particular project, but also any child or adult who is part of the affected population who might suffer harm caused by ADRA Representatives as a part of ADRA's presence.

Complainant: Any person that submits a complaint or report of wrongdoing.

Retaliation: Retribution or reprisal against any complainant as a result of their reporting an incident of wrongdoing, or against any employee that participates in an investigation relating to the allegation of wrongdoing. These may include any direct or indirect detrimental action recommended, threatened or taken because an individual engaged in an activity referred to in the "Protection Against Retaliation" section. When established, retaliation in itself constitutes misconduct, for which appropriate action will be taken.



Whistleblowing Report Form

ADRA will treat all disclosures in a confidential and sensitive manner. The following form is a template for people to disclose whistleblowing events. Complainants can disclose as little or as much information as he/she prefers; however, if details are incomplete it could impact and/or limit the investigation.

Contact Information

Name: _____

Preferred method of contact (mailing address, cell or home phone number, email address, skype name, etc.) _____

Disclosure of Incident(s): Please provide as much detail as possible. If you wish to remain anonymous, do not include your relationship to persons identified in your report or your location relative to persons or incidents in your report. If you intend to print and mail this form, please attach additional pages if you need more room.

1. Please provide details with respect to the location of the incident (e.g. region, specific location, and department).



2. Please describe the nature of your concern. If possible, please include sufficient information for an independent person to understand the concern and to enable further investigation. You can check multiple boxes.

- Dishonest or fraudulent activity
- Substantial mismanagement of ADRA resources
- Sexual misconduct: sexual harassment, exploitation, or abuse
- Child safeguarding incident: physically, verbally, or sexually abusing or neglecting a child
- Corruption
- Conduct involving substantial and specific danger to public, health or safety
- Conduct involving substantial risk to the environment
- Other: _____

3. Please state the full name(s) and title(s) of individuals whom you suspect of wrongdoing.

4. How many times has this incident or, similar related incidents taken place (if applicable)?

5. How long has this incident or, similar related incidents been taking place (if applicable)?

6. Are you aware of any other persons observing this incident, or similar related incidents?
(Yes or No)

7. Would you like to arrange a meeting/telephone call with the Safeguarding Office or relevant ADRA staff member to discuss this matter? (Please note that this option is only open to individuals who chose to provide their name).

8. Please provide any additional information about the wrongdoing and the person(s) alleged to have committed the wrongdoing.

Please email this form to: Protection@ADRA.org

Annex III: Standards to Safeguard Children

Instructions to understanding and applying the Risk Assessment Code (RAC).

Step 1: Learn the terminology:

- ▶ **Hazard:** Anything that may cause harm, injury, or ill health.
- ▶ **Risk:** Risk is a measure of both the likelihood (probability) and the consequence (severity) of all hazards related to an activity or condition.
- ▶ **Risk Assessment Code (RAC):** A hazard risk assessment system from 1 (the highest level of risk) to 5 (the lowest level of risk).
- ▶ **Risk Assessment Matrix:** A tool used to assign RACs (see example below).

Step 2: Making an Investigation Decision: Use the RAC Matrix Tool to assign a code

Evaluate each disclosure based on both the **likelihood** (probability) of an outcome occurring and the **consequence** (severity) of a potential outcome. A crossing on the matrix indicates the RAC number for that deficiency (hazard, condition, activity).

Likelihood Code: Code (A through D) indicating the probability or chance of an event occurring:

- a. **Frequent:** Immediate danger to the health and safety of the public, staff, resources, or property; occurs frequently or continuously.
- b. **Likely:** Probably will occur in time if not corrected, or probably will occur one or more times during the life of the system.
- c. **Occasional:** Possible to occur in time if not corrected.
- d. **Rarely:** Unlikely to occur, may assume exposure /risk will not occur.

Consequence Code: Code (I through IV) indicating the severity of consequence resulting from exposure to a hazard:

- a. **Catastrophic:** Imminent and immediate danger of, ADRA or agency or employee reputational damage, death or permanent disability, chronic or irreversible illness, mental distress, major property or resource damage, work environment culture damage.
- b. **Critical:** ADRA or agency or employee reputational damage, permanent partial disability, temporary total disability greater than 3 months, mental distress, significant property or resource damage, work environment culture damage.
- c. **Significant:** ADRA or agency or employee, hospitalized minor injury, reversible illness, period of disability of 3 months or less, loss or restricted workday accident, compensable injury or illness, minor property or resource damage, work environment culture damage.

Annex III: Standards to Safeguard Children, *con't*

d. **Minor:** ADRA or agency or employee reputational damage, mental stress first aid or minor medical treatment work environment or culture. Presents minimal threat to human safety and health, property, or resources, but is still in violation of a standard or policy.

Step 3: Apply a Risk Assessment Code according to RAC description

A box on the matrix where likelihood meets consequence indicates the RAC number for that deficiency (hazard, condition, activity).		Likelihood (probability)			
		A Frequent	B Likely	C Occasional	D Rarely
Consequence (severity)	Catastrophic	1	1	2	2
	Critical	1	2	3	4
	Significant	3	3	4	5
	Minor	3	4	5	5

Once the RAC code is identified and confirmed by determining the crossing of the Consequence (Severity) and Likelihood (Probability), use the RAC Grid below to determine the resolution timeframe.

Risk Assessment Code	Resolution Location and Timeframe for Whistleblowing and Grievance Policies
Catastrophic Presents an immediate danger to life, health, property, or infrastructure and requires emergency correction or control of the hazard to a lower level of risk. Any allegation of child abuse or sexual exploitation and abuse that involves an ADRA Representative.	Notify ADRA International, the Regional Office, and any supporting ADRA office which has a connection to the incident within 24 hours.
Critical Represents high level of threat to life, health, property, or infrastructure and requires hazard correction or control of the hazard to lower risk as soon as possible.	Notify the Regional Office and any supporting ADRA office which has a connection to the incident within 1 week.
Significant Represents a medium level of risk to life, health, property or infrastructure, with correction planned and completed, or hazard controlled to a lower risk.	Notify the Regional Office and any supporting ADRA office which has a connection to the incident within 2 weeks.
Minor Represents a low level of risk, with correction planned and completed, or hazard controlled to a lower risk.	Notify the Safeguarding Focal Point (Complaint Officer or similar position) and/or the Country Director or Board Chairperson within 3 weeks.

Examples of Applying Risk Assessment Codes (RACs)

Violations, Conditions, and Potential	Probability	Consequence	RAC
Scenario Example 1	An employee alleges sexual exploitation by a senior manager.	I	Catastrophic
Scenario Example 2	Security policies are not followed during an emergency risking lives.	II	Critical
Scenario Example 3	Employee feels their line manager frequently places them in dangerous situations without a security plan for program implementation.	III	Significant
Scenario Example 4	Inappropriate joke from a colleague who has already been warned once that this type of joke is inappropriate.	IV	Minor

Annex IV: Acknowledgment

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- ▶ Save the Child Canada. (YEAR). POLICY.
- ▶ Mercy Corps. (2018). Mercy Corps ethics Complaint and *Whistleblower Policy*.
- ▶ Care International UK. (2018). *Whistleblowing Policy*.
- ▶ UNICEF. (2015). Protection against retaliation for reporting misconduct or for cooperating with duly authorized audits, investigations and other oversight activities. (*UNICEF's Whistle-blower protection policy*).
- ▶ Agha Khan. (2018). Revised *Grievance Policy*.