ADRA Safeguarding Policy

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Definitions

<table>
<thead>
<tr>
<th>ADRA Representatives</th>
<th>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).</th>
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<tbody>
<tr>
<td>Bullying</td>
<td>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.</td>
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<tr>
<td>Harassment</td>
<td>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.</td>
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<td>Local Communities</td>
<td>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.</td>
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<tr>
<td>Safeguarding</td>
<td>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.</td>
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Purpose of the ADRA Safeguarding Policy

This Policy will help uphold ADRA’s purpose statement “to serve humanity so all may live as God intended” and should be integrated across all ADRA offices in policies, practices, programs, and people.

This Safeguarding Policy outlines ADRA’s commitment to safeguard its representatives and the local communities it supports.

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 of the ADRA Safeguarding Policy

- This Policy applies to all ADRA Representatives (see definition above).
- The Policy applies while in and outside of the workplace during working and non-working hours every day of the year.
- Associating with ADRA means that one must comply with ADRA’s standards, even if the standards are higher than one’s local context or governing laws.¹

Policy Statement

ADRA believes everyone regardless of age, gender, disability, ethnic origin, or other diversities have a right to be protected from all forms of harm and abuse, including harassment, bullying, and exploitation. ADRA defines “safeguarding” as providing a

¹ These standards are listed in the ADRA Code of Conduct and the Safeguarding Code of Conduct.
working environment free from abuse and harm to anyone that works with and comes into contact with ADRA Representatives and its projects. The Safeguarding Policy affirms ADRA’s commitment to protect its representatives and the communities it works with from the risks of violence, sexual exploitation, and all other forms of harm and abuse that we may create with our 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.

All forms of harassment, exploitation, abuse, and other forms of harm are never acceptable. ADRA will maintain a zero-tolerance approach to inaction.

ADRA will respond to anyone who raises a credible allegation of misconduct and take necessary action in an independent and thorough manner.

When a claim is substantiated against ADRA or one of our implementing partners, ADRA will do all that is practically feasible to provide confidential assistance and support to the victim or survivor, take appropriate actions towards subjects of complaint, and at the very minimum will ensure that an individual is 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 programmatic service delivery 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 its safeguarding work. 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 workplace and programs.

3. **Inclusive and Empowering**

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.

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 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.

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

• Access to support mechanisms including counselling support;
• 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.²

- **Operational:** ADRA Sri Lanka 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 and Activities:** The Program Unit in collaboration with implementing partners and the Marketing and Development Unit must assess the level of risk for potential negative consequences and adapt the program design or content gathering plan while also including prevention strategies accordingly.

- **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.

**Reporting Safeguarding Concerns**

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² Tools for safeguarding risk management are located in the Safeguarding Implementation Toolkit on ENet: Operational Risk Management, Program Risk Management, and Partner Risk Management.
Conduct that undermines 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 taking place within a project or bullying in the workplace, should report it through the appropriate complaints mechanisms – i.e. through existing project and office-level complaint and feedback mechanisms, or through internal channels such as line management or the protocols outlined below.

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 Sri Lanka Complaints and Response Mechanism Policy and the Conflict Resolution and Grievance Procedures as outlined in the HR Policy.

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 Safeguarding Focal Point (or equivalent) and then the Country Director within 24 hours or as soon as possible.

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

The Safeguarding Officer (or equivalent) 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 Focal Point/Officer, they should within 24 hours or as soon as possible, first report to at least the Country Director, Program Director, Finance Director or Human Resources Director. If the report involves, or is not acted upon by ADRA Sri Lanka senior management, next they should bring the report to the Board Chair and then to the ADRA Asia Regional Director. Final points of contact are:

- ADRA’s Safeguarding Office ([Protection@adra.org](mailto:Protection@adra.org) or +1 (301) 680-5168); or
- ADRA international’s whistle blowing platform ([www.adventist.ethicspoint.com](http://www.adventist.ethicspoint.com)) or +1 (877) 874-8416).

For cases which involve a representative of another organization, the Safeguarding Office or the local Safeguarding Officer 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**

When appropriate, an administrative safeguarding investigation will be conducted and possible referral to statutory authorities for criminal investigation under the law of Sri Lanka; and/or by ADRA in accordance with disciplinary procedures.

**Disciplinary Consequences**

Any substantiated violation of the Safeguarding Policy and the Code of Conduct can be considered an act of gross misconduct and cause for termination in line with ADRA Sri Lanka’s Disciplinary Procedures and HR Policy. 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.

**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.

ADRA Sri Lanka Board is ultimately accountable for this Policy and the Country Director is responsible for its implementation.

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 Policy will be reviewed every three years or sooner if needed by the Safeguarding Office in line with existing Policy review guidelines.