

Speak Up Policy

Level 1 Policy



Photo: Tom Peyre-Costa/NRC

Document information

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Scope	Global
Related document(s)	Alleged Misconduct Incident Triage and Response SOP Code of Conduct Protection From Sexual Exploitation, Sexual Abuse & Sexual Harassment Policy Child Safeguarding Policy Anti-Corruption Policy Conflict of Interest Policy
Date	December 2023
Review date	December 2025
Version	1.0

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A letter from the Secretary General

Dear colleagues and valued partners,

Norwegian Refugee Council exists to aid and protect those affected by displacement. To achieve this, we must have the trust and confidence of our own staff, our partners and the people we serve. We need all our staff, our partners, our suppliers, our project participants and the public to tell us if they know or suspect that something is wrong. This helps us investigate and resolve possible wrongdoing and hold people accountable where there has been misconduct. We want you to ‘speak up’ without fear, and with confidence in NRC’s commitments to follow up on your concerns.

This policy explains what you can speak up about, how you do it and how NRC will handle the issues that you raise. It sets out important principles for our work in this area. In particular, someone who has ‘spoken up’ in accordance with this policy should not be subject to any form of retaliation for doing so, and what they say should be treated as confidential. NRC will take your concerns seriously, following a ‘survivor-centred’ approach, and will act upon your concerns if they are found to be true. We will also act against false allegations and protect those who are victims of such allegations. The policy, in short, sets out your rights and obligations in relation to ‘speaking up’.

I encourage all of you to read this policy carefully, and to take your and NRC’s commitments seriously. If you have any questions, ask your manager or a colleague from the Risk & Compliance team.

Thank you for helping to put this important issue at the heart of the work that NRC does for displaced people.



Jan Egeland, Secretary General



Are you protected under the Speak Up Policy?

Are you a person from one of these groups?

Former and current employees (including NORCAP experts); recruitment candidates; board members; contingent workers; interns; volunteers; consultants, partners, suppliers and other contractors; project visitors; donors and family and colleagues who support those who report.

Are you disclosing a reportable concern?

Anything you observe, experience or become aware of that you suspect to be a risk, wrongdoing or misconduct at NRC.

Are you using a speak up channel?

Trusted senior manager or other trusted employee
Speak up email (speakup@nrc.no)
Speak up form

You are protected under this policy

1 Purpose and scope

The Norwegian Refugee Council ('NRC') is committed to acting with integrity and fairness, in accordance with our values. All NRC employees are required to sign the Code of Conduct when they join the organisation, which holds them to the highest standards of behaviour. However, sometimes things can happen within the organisation that cause concern. NRC needs to find out about these issues quickly, so that we can understand what has happened and take action if needed.

NRC relies on our employees and third parties, such as partners, consultants and suppliers, to tell us about concerns they may have. This gives NRC the opportunity to react to and deal with any issues and hold those responsible for wrongdoing to account. Staying silent may mean that:

- the problem continues and things may get worse
- harm is caused to employees, project participants and others
- people lose trust in NRC
- NRC suffers financial harm, and
- NRC and the humanitarian community suffers reputational damage.

This Speak Up Policy ('the policy') is NRC's whistleblowing policy. It ensures that anyone who speaks up to NRC can do so in the knowledge that:

- their concerns will be taken seriously
- their concerns will be followed up using a survivor centred approach
- every effort will be made to ensure confidentiality, and
- they are protected against retaliation for speaking up.

The policy explains:

- who can speak up to NRC
- what types of concerns may be reported under the policy
- how to speak up to NRC
- what principles NRC follows when someone speaks up, and
- the obligations employees and third parties have when speaking up to NRC.

This is a Level 1 governing document. This means that it is a mandatory document. It applies globally. NRC Offices may create an amendment to the policy to comply with

national legal requirements on whistleblowing in accordance with the Governing Documents Policy.

2 Definitions

The following terms are used throughout the policy:

Term	Definition
NRC	Norwegian Refugee Council and all other NRC entities, including legal entities, such as Flüchtlingshilfe Deutschland, NRC US and NRC UK, and non-legal entities, such as NORCAP, Internal Displacement Monitoring Centre (IDMC) and ACAPS
NRC Office(s)	Country, Regional, Representation or Head Office(s)
Policy	This Speak Up Policy
Reportable concern(s)	A concern which can be reported under this policy to NRC, as defined in section 4 of the policy
SOP	The Alleged Misconduct Incident Triage and Response SOP
Speak up	To tell NRC about a reportable concern (whistleblow)
Speak up channels	The channels used for whistleblowing at NRC, as defined in section 5 of the policy
Speak up system	The system for managing reportable concerns as described in the SOP
Survivor centred approach	An approach which ensures the safety and confidentiality of the survivor at all times; treats those involved with dignity and respect; is non-discriminatory, transparent, and guided by respect for the survivor's choices
You/your	People who can speak up to NRC, as defined in section 3 of the policy

3 Who can speak up to NRC?

This policy applies to:

- employees, including NORCAP experts
 - former employees and recruitment candidates
 - board members
 - contingent workers,1 interns and volunteers
 - consultants, partners, suppliers and other contractors,
 - project visitors
 - donors (public or private) and
 - family and colleagues who support those who report
- who disclose a reportable concern to NRC ('you/your').

The communities we work with and project participants should direct any concerns to their local Complaints and Feedback Mechanism (CFM) in accordance with NRC's Complaints and Feedback Policy. Any such complaints received by the speak up system will be referred to the appropriate CFM and followed up appropriately.

4 What is a reportable concern?

A reportable concern is anything you suspect, observe, experience or become aware of that may be a risk, wrongdoing or misconduct at NRC. Some examples of reportable concerns are:

- criminal offences, including:
 - fraud, aid diversion, bribery or corruption
 - sexual exploitation, sexual harassment or sexual abuse
 - child abuse
- behaviour that contradicts NRC's principles and values
- discrimination, including discrimination based on race, ethnicity, disability, gender or sexual orientation
- bullying and harassment
- retaliation against someone who spoke up in good faith
- other breaches of NRC's Code of Conduct
- health, safety or security issues
- actions perceived as unethical
- harm or damage to NRC's reputation, governance or anything otherwise detrimental to its interests
- harm or damage to the environment caused by NRC's operations.

For employees only: personal work-related grievances

Reportable concerns do not normally include personal work-related grievances.

A personal work-related grievance is a report of behaviour that has implications for the discloser personally and does not have organisational implications for NRC or the working environment at NRC. Examples include an interpersonal conflict between you and another employee, or dissatisfaction with a decision relating to your employment.

Complaints of this nature should be referred to the appropriate Human Resources (HR) department and dealt with according to NRC's HR procedures.

If you are unsure if your concern is a personal work-related grievance or not, please report it to one of the speak up channels. You will then be advised of whether it will be dealt with under the speak up system or HR procedures.

5 Speak up channels

You may use any of the following speak up channels to inform NRC about reportable concerns:

5.1 Trusted senior manager or other trusted employee

You may choose to report your concerns to a line manager or another senior manager whom you trust. You may also choose to report your concerns to Human Resources, Risk and Compliance staff or an assigned focal point.

These employees have a duty to take action in accordance with the policy and the SOP, whilst respecting your confidentiality.

5.2 Speak up email

You can use the speak up email to report to NRC: speakup@nrc.no.

The email is monitored in a secure and confidential manner by the Risk Management Section at NRC's Head Office in Oslo.

5.3 Speak up form

You can use the speak up form, which is available on NRC's webpage (www.nrc.no), to report to NRC. This allows you to report anonymously should you wish to do so.

The speak up form is monitored in a secure and confidential manner by the Risk Management Section at NRC's Head Office in Oslo.

Making a disclosure externally

In some legal jurisdictions, there are other ways you can make disclosures, for example to a supervisory authority (such as a data protection regulator), or when making an emergency or public interest disclosure. Before making such a disclosure it is recommended that you seek independent legal advice to understand the criteria for making such a disclosure.

6 Speak up principles

NRC makes the following commitments:

6.1 NRC will foster a speak up culture within the organisation

NRC is committed to building a culture of trust, impartiality and safeguarding throughout the organisation to encourage you to speak up about reportable concerns to NRC.

This includes:

- ensuring that disclosures are acted on in accordance with the speak up system
- ensuring that senior management and the board are kept informed about the speak up system
- raising awareness and training staff at all levels in the organisation about the speak up system
- raising awareness among third parties, including partners and suppliers, about the speak up system, and
- monitoring and continually improving the speak up system.

6.2 NRC will provide safe and confidential channels for you to speak up

NRC will provide safe channels for you to speak up about reportable concerns.

You can report to NRC without revealing your identity. NRC treats anonymous complaints seriously and will follow them up in accordance with the policy. If you report anonymously, please be aware that:

- it is difficult to provide you with appropriate support if NRC does not know who you are, and
- it is more difficult to investigate reports if NRC cannot ask you for more information about what happened.

If you do choose to report anonymously, please provide as much evidence as possible to allow NRC to investigate your concerns.

6.3 NRC will treat your disclosure in a confidential and sensitive manner

NRC will do its utmost to protect your confidentiality. This means that your identity, or any other information which could identify you will only be disclosed to staff involved in managing and investigating your concern, on a strict need-to-know basis.

NRC will follow a survivor centred approach when following up on reports.

6.4 NRC will protect you from retaliation for reporting concerns

If you speak up in good faith about a reportable concern, you are protected from retaliation, regardless of whether the allegation turns out to be true or not. This also applies if you participate in an authorised audit or investigation.

All forms of retaliation against you for speaking up, including any threats of, or attempts at, retaliation, are prohibited. Any employee who does so may have disciplinary measures taken against them.

Examples of retaliation include, but are not limited to:

- negatively changing employment conditions e.g. work location or work tasks
- discrimination or unfair treatment
- unsubstantiated negative performance appraisals or feedback that is not reflective of actual performance
- unjustified contractual changes, such as dismissal or suspension
- bullying or harassment, whether verbal (e.g. jokes, comments, ridicule); written (e.g. emails, social media comments) or physical (e.g. gestures, threatening poses)
- isolation or exclusion from social activities, or
- termination of, or threats to terminate, contracts for goods or services.

If you notice any retaliation against you or anyone else for raising or having raised a reportable concern, you are encouraged to report it using one of the speak up channels. A report about retaliation is treated like any other disclosure and the procedures in the SOP will be followed.

If it is found, following an investigation, that you have been the victim of retaliation, you will be entitled to an appropriate corrective remedy, for example the termination of the retaliatory action, or, for employees, reassignment (with your consent) to another office or position for which you are qualified.

6.5 NRC will consider if interim protective measures are required

If you speak up about a reportable concern, NRC will take a risk-based and survivor centred approach when considering what protections and support are appropriate for you in the circumstances.

NRC will consider, in consultation with you, whether interim protective measures are required, for example:

- temporary reassignment, with your consent
- transfer to another office, with your consent
- special security measures; or
- any other appropriate actions such as psychosocial or medical support.

6.6 NRC will take your concerns seriously and will follow them up appropriately

NRC will take your concerns seriously and will respond in a timely, fair and consistent way in accordance with the SOP.

NRC will communicate with you as appropriate, including:

- an acknowledgment of receipt of your report within 5 days
- an indication of how your report is going to be followed up
- if an investigation is commissioned:
 - an estimation of how long the investigation will take
 - confirmation when the investigation has been completed
 - confirmation that action has been taken following the delivery of the report

NRC will not disclose to you details of the action taken, including any disciplinary procedures, to protect the confidentiality, privacy and legal rights of those concerned.

6.7 NRC will take appropriate action where reportable concerns are substantiated

NRC will take appropriate action when a concern is found to be substantiated in accordance with the SOP and other applicable procedures and policies.

7 Your obligations

You have the following obligations under the policy:

7.1 You must speak up about reportable concerns immediately

If you are an employee

Employees have a duty to report observed or suspected wrongdoing through the speak up channels.

It is **mandatory** for all employees to report immediately (meaning at the latest within 24 hours of becoming aware) any concerns relating to:

- sexual exploitation, sexual abuse, sexual harassment or child abuse within NRC (or the wider community) involving NRC staff, other aid workers or other individuals
- other safeguarding issues, and
- fraud, aid diversion, bribery or corruption

Other alleged violations of the Code of Conduct or other reportable concerns should be reported as soon as possible.

If you are a third party

Third parties are strongly encouraged to speak up about reportable concerns as soon as possible, using the speak up channels.

If harm may be being caused to someone, including sexual exploitation and abuse, you should report it immediately, at the latest within 24 hours of becoming aware.

7.2 You must not investigate the matter yourself

Do not investigate the matter yourself – use the speak up channels to report with the facts you have. NRC does not expect you to have all the answers or evidence and does not expect you to prove that your concern is well-founded.

If you look into the matter yourself, it could put you or others in danger and could impact a future investigation.

It is NRC's duty to find out what has happened and to take action when needed.

7.3 You must speak up in good faith

You are protected under the policy if you speak up in good faith regardless of whether the allegation is found to be substantiated or not.

You must not intentionally make allegations that you know are false, malicious, untrue or misleading. This is considered a serious matter and (if you are an employee) may lead to disciplinary measures being taken against you.

7.4 You have a duty to respect confidentiality

You have a responsibility to protect your confidentiality and the confidentiality of others by:

- being discreet, and
- not discussing your report with others outside of those involved in handling your report.

Employees are reminded that they have a duty of confidentiality under the Code of Conduct.