Report in accordance with the Transparency Act

30 June 2024

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Updated: 30 June 2024

NRC | NORWEGIAN REFUGEE COUNCIL

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1 Introduction

This report explains the actions taken by the Norwegian Refugee Council (**NRC**) from June 2023 to June 2024 to comply with the requirements of the Norwegian Transparency Act (**the Act**). [1]

The Act requires organisations to publish an annual account of the due diligence undertaken by organisations to establish whether there have been any actual or potential adverse impacts on human rights and decent working conditions that it has caused or contributed towards, or that are directly linked with its operations, products or services via its supply chain or business partners (**adverse impacts**). [2]

In accordance with the Act, this report explains:

- what NRC does and how we are structured
- how we manage adverse impacts
- actual adverse impacts we have experienced during the last year
- identified potential risks of adverse impacts, and
- planned measures we will take to mitigate these risks.

1.1 What does NRC do?

NRC is an independent humanitarian organisation helping people forced to flee.

We protect displaced people and support them as they build a new future. We started our relief efforts after World War Two. Today, we work in both new and protracted crises across 40 countries. We specialise in six areas: food security, shelter, legal assistance, education, protection from violence, and water, sanitation and hygiene.

We stand up for people forced to flee NRC is a determined advocate for displaced people. We promote and defend displaced people's rights and dignity in local communities, with national governments and in the international arena. NRC's Internal Displacement Monitoring Centre in

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[1] https://lovdata.no/dokument/NLE/lov/2021-06-18-99/%C2%A75#%C2%A75

[2] https://www.forbrukertilsynet.no/vi-jobber-med/apenhetsloven/the-transparency-act

Geneva is a global leader in monitoring, reporting on and advocating for people displaced within their own country.

We work with partners across the world through NORCAP, our global provider of humanitarian, development and peacebuilding expertise. NORCAP collaborates with many UN agencies and other international, national and local partners on finding sustainable solutions to meet the needs of people at risk.

Around 15,000 humanitarians work with NRC. Most are hired locally to work in the field, and a small number are based at the Head Office in Oslo.

We protect displaced people and support them as they build a new future. We work in new and protracted crises across 40 countries. We specialise in six areas: food security, shelter, legal assistance, education, protection from violence, and water, sanitation and hygiene.

2.2   How is NRC structured?

NRC is a Norwegian **foundation** (*stiftelse*). Our Head Office is situated in Oslo. We have **representation offices** situated in Belgium, Germany, Switzerland, UK and the USA.

We implement programmes in over **40 countries** across the globe. These countries are **grouped into regions**, which are overseen by regional offices that are located in Colombia (Latin America), Jordan (Middle East and North Africa), Kenya (East and Southern Africa), Oslo (Asia), Poland (Central and Eastern Europe) and Senegal (Central and West Africa).

Figure 1 Map showing the locations of NRC operations (orange) and NORCAP deployments (grey) as of March 2024
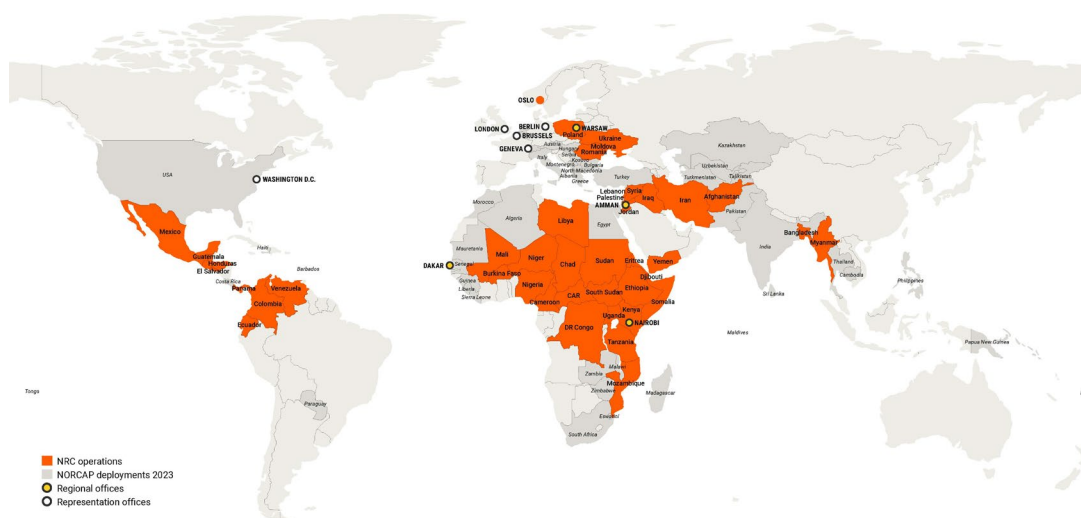
2 How we manage adverse impacts

NRC is a **rights-based organisation** and **compliance with human rights is at the core of what we do**. NRC manages adverse impacts by having appropriate and effective policies and procedures in place, and ensuring we have well-trained, experienced staff to apply these documents in practice.

3.1 Policies and procedures

This table gives an overview of some **key documents** which explain how NRC manages adverse impacts:

Name	Purpose
Anti-corruption policy and procedures	Explain NRC's zero tolerance approach to all forms of corruption and how corruption is prevented and tackled throughout the organisation.
Code of Conduct	Explain the standards of behaviour which all staff must comply with. Some third parties working with NRC are also required to sign a Non-staff Code of Conduct.
Complaints and Feedback Mechanism Policy and associated procedures (CFM)	A mechanism that is set up in every country office to enable communities and project participants to report complaints or concerns to NRC in a safe and effective way.
HR Handbook and associated procedures	Explain the employment standards and minimum requirements which must be followed when employing staff throughout the organisation.

Logistics Handbook and associated procedures	Explain the procurement procedures to be applied throughout the organisation, including the due diligence needed for suppliers and ethical standards they must meet.
Partner toolkit and associated procedures	Explain how NRC works with different types of partners. Includes procedures for carrying out due diligence when identifying suitable partners.
Risk management policy and associated procedures	Set the organisational objectives for risk management which include reducing any negative impacts of NRC activities on the people that the organisation works with, in accordance with "do no harm" principles. Also sets clear responsibilities for risk management across the organisation. Procedures associated to this policy explain how NRC manages all types of risks throughout the organisation.
Safe and inclusive programming (SIP)	Procedures to ensure the safe and effective delivery of programmes.
Safeguarding policy and associated procedures	Explain NRC's zero tolerance of inaction on sexual exploitation abuse and harassment (SEAH). Explain the commitments and practical measures that NRC adopts to promote the safety and wellbeing of everyone involved in the delivery and receipt of NRC's assistance and programmes.
Speak Up policy and associated procedures	Explain how staff, partners, suppliers and others can safely report concerns to NRC if they become aware of suspected wrongdoing within the organisation and how these are followed up.

3.2   Appropriate staffing

NRC has **appropriately qualified, trained and knowledgeable staff** in place throughout the organisation who make sure the correct procedures are in place and ensure they are complied with.

Staff at our Head Office are responsible for establishing correct procedures to identify and manage adverse impacts throughout the organisation. The following key global teams are involved in this:

Team	Responsibility
Global logistics	Ensuring due diligence during procurement processes
Global HR	Ensuring ethical and appropriate HR procedures
Investigations	Conduct investigations into allegations of staff misconduct and other wrongdoing
Partnerships and policies	Due diligence processes for partners
Programmes	Ensuring ethical and appropriate procedures for project participants Ensure safeguarding in programming
Risk management	Ensuring processes to identify, assess, monitor and report on all risks, to address high-risk issues. Reponsible for the Speak Up system
Safeguarding	Ensure that safeguarding is mainstreamed throughout the organisation

Staff at regional and country level in other teams, including in logistics, finance, human resources, programme, are then responsible for **implementing the procedures** developed by Head Office; **adapting them appropriately** for the context in which they are to be applied; and **ensuring compliance**.

NRC has risk and compliance staff in place across the organisation to support management in identifying and addressing high-risk issues.

3.3   Managing risks

NRC has a **well-established risk management and reporting system** in operation to identify, assess, address and report on all types of risks affecting NRC's operations and objectives. NRC's Risk Category table is produced in Annexe 1.

There are **global** (enterprise), **regional** and **country** level risk registers where the biggest risks within the specific context are identified, mitigated

and monitored. There is a process to escalate particularly high risks to the appropriate level within the organisation for decision.

Some of the identified risks include adverse risks as defined by the Act, namely risks of corruption, sexual exploitation and abuse, or other breaches of human rights. The source of the risks may be staff misconduct, or external parties such as partners, suppliers or others. Mitigation measures are put in place to reduce the risks, and the risks are continually monitored at the appropriate level.

3.4   Receiving and managing complaints

NRC has several ways of receiving complaints or concerns.

NRC has an **incident managing system**, which sends notifications of incidents to the appropriate place in the organisation for management and follow up.

NRC staff, partners and suppliers are encouraged to use **Speak Up**, NRC's whistleblowing system, to report alleged wrongdoing by NRC staff or serious concerns relating to the organisation which have not been dealt with in a satisfactory way, for example harm caused to the environment.

Project participants and local communities are encouraged to use the **Complaints and Feedback Mechanism (CFM)** to report complaints about our programmes or other types of concerns to us. When it is appropriate, CFM concerns may be referred to the Speak Up system for follow up.

Once a concern is received, an **experienced team** examine the nature of the concern. Serious concerns, for example alleged corruption or sexual abuse, are **referred for investigation** by NRC's team of professional investigators. Other types of concerns are followed up appropriately at the correct place in the organisation.

3 Actual adverse impacts

In the previous year, NRC has experienced the following adverse impacts as defined by the Act:

3.1   Sexual Exploitation Abuse and Harassment (SEAH)

From January 2023 to January 2024, NRC had **64 SEAH-related allegations**, **46 of which were investigated** (see Figure 2). A breakdown of the types of case is provided in Figure 3.
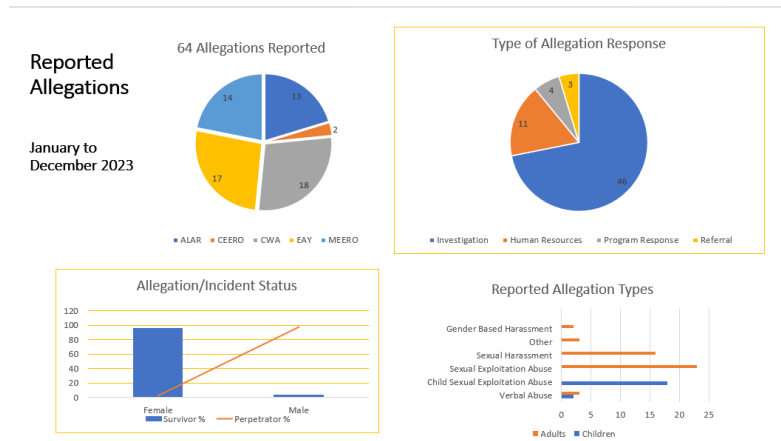

Figure 2

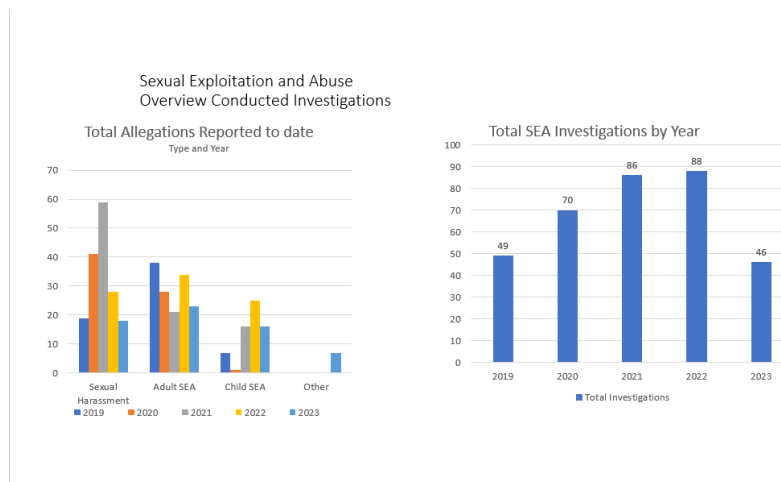Figure 3

3.2   Corruption cases

NRC produces an **annual report on corruption cases**, which is available on our website.

3.3   Working conditions

In some contexts where NRC works, it is possible that working conditions and respect for employment rights may be limited. There is therefore some risk of adverse impacts in terms of NRC's procurement of items from local suppliers.

3.4   Environmental impacts

NRC's impact on the environment has an immediate impact on the communities we serve. NRC is determined to include environmental considerations as part of all our decision making and work with communities to reduce harm. NRC has committed to **reducing our carbon footprint by 20% per staff member by 2030** and is currently focusing on cutting flight, vehicle and generator emissions. We are implementing **Environmental Minimum Standards** and launching a **Waste Reduction initiative**.

NRC publishes as **annual Carbon Footprint Report** on our greenhouse gas emissions and a comprehensive comparison of performance to reduce the carbon footprint against a baseline report conducted in 2019.

3.5   Impacts on project participants

Safe and Inclusive Programming (SIP) is the terminology that NRC uses to describe the **mainstreaming of protection, age, gender and diversity in NRC programmes**.

SIP is about **how** we design, deliver and evaluate programmes in a way that meets the specific needs of displaced and vulnerable people, while considering the risks they face and minimising harmful, unintended consequences of our interventions. This requires applying a protection, gender, age and diversity lens.

The intent is to safeguard the people-centred nature of NRC programmes, holding NRC accountable for ensuring communities have a voice in the decisions and services that affect their lives. It ensures that all NRC programmes and approaches respect certain standards, so that they are safe and inclusive for the communities and people that NRC works with. For example, a lack of safety along the route that the community needs to travel to reach our project site can expose them to harm when accessing services and be a barrier to access rights and essential services. We need to identify and mitigate such programmatic risks.

4 Identified potential risks of adverse impacts

NRC has identified several areas where there are particular risks of adverse impacts:

4.1 Adverse impacts and our staff

NRC has obligations towards our staff concerning adverse impacts and staff also have an obligation to act in a way which avoids adverse impacts on others, and to report them if they do arise.

NRC has identified **two global risks** on the global risk register that bring high risk to the organisation and may seriously impact individual staff:

- Staff Health, Safety and Security is compromised
- Staff affected by Sexual Exploitation Abuse or Harassment

These risks are regularly monitored and mitigated.

NRC staff working in an IDP camp in Burkina Faso

Photo: Ousmane Drabo/NRC

4.1.1 Current measures NRC is taking to manage these adverse impacts

NRC controls the identified global risks for staff by:

- conducting security risk assessments in all area office locations with corresponding mitigation plans
- improving our allegation management procedures, and
- improving our Health Safety and Security Reporting System.

During 2024, NRC has made the following improvements to manage these adverse impacts:

- the approval by management of a **new Safeguarding Policy**
- **new HR processes** to improve working conditions, and
- the roll out and implementation of a **new Speak Up Policy**.

4.1.2 Improvements NRC will make to manage these adverse impacts

There are several plans in place for the coming year, including:

- further **improvement of the Speak Up system**
- rolling out the Safeguarding Policy and introduction of a new **Safeguarding Framework**
- a **new Anti-Bribery Policy and Anti-Corruption Handbook**
- more training for staff on adverse impacts, and
- producing a new Code of Conduct which will have even clearer behavioural requirements on staff on adverse impacts.

4.2 Adverse impacts and our project participants

NRC has obligations towards our project participants based on the Core Humanitarian Standards and the Do No Harm principle.

NRC has **one identified global risk** on the global risk register that bring high risk to the organisation and may seriously impact project participants: that project participants may be exposed to further harm. This risk encompasses risks of SEAH and risks of other types of harm.

Youth theatre in Colombia.

Photo: Marcela Olarte/NRC

4.2.1 Current measures NRC is taking to manage these adverse impacts

NRC's key control to manage the identified risk to project participants is a **Safe and Inclusive Programming action plan**.

SIP requires all NRC staff, no matter the sector they work in, to incorporate and apply basic protection principles and promote meaningful access, safety and dignity in humanitarian aid. SIP action plans identify and prioritise activities that are key to managing risks associated with NRC programming.

Examples of SIP actions include:

- ensuring safe and accessible location of facilities and services
- meaningful participation of beneficiaries throughout the project cycle
- safe management of facilities and services, and
- setting up accessible, safe and confidential CFMs.

4.2.2 Improvements NRC will make to manage these adverse impacts

NRC is continuing to strengthen the CFM and is working on **a new CFM Policy and Handbook**. The system surrounding the referral of serious cases from the CFM to the Speak Up system will be strengthened.

NRC's new **Safeguarding Policy** will also impact our work in this area, by introducing a **safeguarding framework** and emphasising the need for **a survivor centred approach** in relation to allegation management for our project participants.

4.3 Adverse impacts and partners

NRC partners and coordinates with a wide variety of organisations, including UN organisations, international non-government organisations, local non-government organisations, universities and local government actors. Working with partners allows us to mobilise necessary resources and competencies, to maximise collective impact and achieve better outcomes for the communities we work with.

NRC also has a strategic goal to partner with more local actors. This brings **significant benefits**, including:

- complementing the efforts and interventions of local actors and systems
- building relationships and trust and increase acceptance and accountability to affected populations
- exchanging expertise and engaging in mutual learning
- developing networks, advocating, and investing in system change
- providing a strategy for sustainability and exit, and
- increasing efficiency and enhancing capacity and reach.

However, working with partners, brings risks as well as opportunities.
NRC has identified **three global risks** on the global risk register concerning partners:

- breach of sanctions law and counter-terrorism regulations (sanctioned entities include those recognised as human rights violators)

- partners exposing our project participants to further harm
- partners engaging in corruption

In addition, local partners may not have the same capacity to identify and manage adverse impacts. In order to mitigate these risks, NRC has taken several steps throughout 2024 and is working to continue improving in this area.

Working together with a local partner in Iran.

Photo: Hiwa Karami/NRC

4.3.1 Current measures NRC is taking to manage these adverse impacts

NRC uses the following key controls to manage the identified risks involving our partners:

- conducting sanctions and counterterrorism checks for all partners
- use of the Organisational Assessment Tool (**OAT**) when conducting due diligence on partners, and
- communicating NRC's Code of Conduct to partners.

During 2024, NRC has strengthened our systems that apply when choosing partners, when contracting with partners and when working with partners. Specifically, NRC has:

- **Strengthened the OAT**
  This tool must be completed prior to entering a partnership and assesses whether an organisation is a suitable partner for NRC. NRC has added additional requirements to the tool concerning the measures partners have in place to manage adverse impacts.
- **Updated contractual requirements**
  NRC has updated our partner contracts to ensure we can take steps up to including termination of the contract if a partner fails to manage adverse impacts. NRC has also inserted a contractual requirement to report to the Speak Up system.

- **Improved procedures to manage local partnerships**
  NRC has been working on improving the tools available to staff when working with partners. This includes more information on working with partners and building their capacity to manage adverse impacts. A key development for 2024 is the introduction of procedures to identify assess and address risks associated with every single potential partner and for escalating the decision on establishing partnerships that may bring high-risk to NRC or project participants.

4.3.2 Improvements NRC will make to manage these adverse impacts

Working together with partners and building their capacity to manage adverse impacts is a key ambition for NRC. More will be done to strengthen our tools in this area and to train our staff in how to capacity build partners in an effective way.

4.4 Adverse impacts and suppliers

NRC engages with a wide variety of suppliers across the globe. Before working with suppliers, checks are undertaken to make sure they reach our standards in accordance with the NRC Logistics Handbook.

NRC has identified **three global risks** on the global risk register concerning suppliers. These risks are the same as for partners, namely:

- breach of sanctions law and counter-terrorism regulations (sanctioned entities include those recognised as human rights violators)
- suppliers exposing our project participants to further harm
- suppliers engaging in corruption

Aid awaiting disbursement in Eastern Ukraine.

Photo: Christian Jepsen/NRC

4.4.1 Current measures NRC is taking to manage these adverse impacts

In relation to the identified global risks for our suppliers, NRC controls the risks by:

- conducting sanctions and counterterrorism checks for all suppliers conducting due diligence on suppliers, and
- communicating NRC's Code of Conduct to suppliers.

During 2024, NRC has taken the following additional steps to manage adverse impacts in relation to suppliers:

- **Updating the ethical declaration**- all suppliers must sign an updated ethical declaration. The wording on this has been strengthened.
- **Updating contractual requirements**
  NRC has updated our supplier contracts to ensure NRC can take steps up to including termination of the contract if a supplier fails to manage adverse impacts.

4.4.2 Improvements NRC will make to manage these adverse impacts

NRC plans to develop a system for identifying and mapping high risk suppliers. High risk areas are anticipated to include transportation, clothing and water trucking.

Guidance will be developed on what to do if a high-risk supplier is not compliant in order not to disrupt operations and at the same time work towards compliance with the requirements of the Act.

Annexe 1   NRC's Risk Categories

Scope, purpose and overview

The table below is part of NRC's Risk Management framework and presents NRC's risk categories and risk types to be used for categorising all risk generating in operations (Regional and Country Offices)

Risk category	Risk type	Definition/explanation	Examples
CONTEXTUAL RISKS *(Many of these factors are beyond the control of humanitarian actors – but some may be influenced through advocacy – and through an acceptance strategy.)*	**P**olitical	Factors that determine the extent to which government and government policy may affect a specific sector or an organization.	Armed conflict, violence, unrest, change in government/elections/*coup d'état, break-down of the rule of law, impact of various government policies at national, provincial and local levels, impact of lobbying and campaigning by interest groups, etc.*
	Economic	Factors that impact on the economy and its performance, which in turn affects the organisation's ability to sustain an operation in the country.	Economic situation for specific population groups, unemployment, lack/state of infrastructure, market constraints or failure, exchange rate fluctuations, import barriers, taxes, high inflation, etc.
	Social	Key aspects of the social environment in a country.	Demographic trends and changes, poverty levels, lack of access to basic services and education, credibility of information sources/channels, social identity/culture, public perception of humanitarian sector, etc.
	Technological	Factors pertaining to technology availability and technological development (not only digital).	Population groups' lack of access to technology, innovation environment, availability and cost of procuring technology, limited mobile phone and internet connectivity, etc.

PESTEL	**E**nvironmental	Factors relating to the influence of the surrounding environment and the impact of climate change.	Natural disasters (floods, drought, etc.), lack of availability/access to water, negative impact of seasonal climate variations, national environmental regulations, etc.
	Legal	Factors related to the legal operating environment for the organisation.	Human rights infringements, negative impact of host government laws and regulations (incl. labour law), access to work and other necessary permits, registration process for humanitarian organisations, etc.
PROGRAMMATIC RISKS	Delivery and implementation	Ability to achieve programme objectives	Overly ambitious objectives, unrealistic timelines, inadequate human capacity assigned to programme implementation, under-budgeting of cost, basing programmes on flawed assessments, pilot innovations on a large scale, human error, etc.
	Access and relationships	Failure to access target groups	Lack of stakeholder contacts (incl. dialogue with de facto authorities and others claiming control of areas), lack of understanding of context, no acceptance strategy, lack of negotiation capacity among staff, etc.
	Do-No-Harm	Humanitarian interventions having negative impact	Programmes not conflict sensitive, do not relate to the markets in the country, make target groups dependent on aid, replacing state functions through substitution of service delivery, fails to relate to longer term development aspirations of target group, creating wrong expectations among target groups, etc. Safeguarding risks, SEA risks or child protection issues.
	Quality	Programme quality	Weak or non-adherence to Project Cycle Management, non-adherence to minimum standards, lack of Monitoring and Evaluation (M&E), lack of staff capacity and expertise, lack of base-line data, lack of protection mainstreaming in programmes, poor quality information for decision making, etc.
	Accountability	Accountability to target groups, authorities, donors and private sponsors	Non-adherence to NRC and donor rules and regulations, lack of involvement of target group in planning, design and monitoring of interventions, lack of M&E, lack of complaints mechanism for target groups, etc.
PROGRAMME SUPPORT AND	Resources and capacity	Non-tangible assets (finance)	Funding constraints, disallowed costs, financial deficits, inconsistent and/or inflexible funding, politicisation of aid, non-compliance with NRC/donor regulations and rules, etc.

COMPLIANCE RISKS		Adequate and appropriate human resources	High staff turn-over, difficult to recruit staff to specific geographical areas or with specific technical knowledge in key topics (protection, advocacy, safeguarding, SEA etc)
		Adequacy information for decision making	Non-functional internal information system, flow of information from Agresso and PMIS not available/not timely,
		Tangible assets	Logistics, IT, equipment
	Reputational	Negative information or perceptions damaging integrity or credibility	Negative media stories, negative public statements, litigation towards the organisation by staff, ex-staff or other stakeholders, etc.
	Legal and compliance	Violations of internal and external regulations	Violations of host country laws, international sanctions or counter-terrorism restrictions, violations of registration provisions and labour policies/laws, non-compliance with NRC/donor regulations and rules, no legal competence link to the organisation, breach of Code of Conduct, nepotism in (e.g. HR and logistics), except items covered under HSS below, child abuse and sexual crimes.
	Resilience	Ability to withstand negative impacts	Lack of capacity of IT systems, absence of resource reserves, high staff turn-over, lack of hospital or other medical institutions, remoteness of duty station (making medical evacuation time consuming/difficult)
Health, Safety and Security HSS	Criminal activities against people or tangible assets	Criminal activities against people or tangible assets	Crimes against public peace, conflict related violence; (rioting, shelling, terrorist activities, aerial bombardment, etc.)
			Crimes against life and limb; (murder, assault, brawl, etc.)
			Crimes against freedom and honour; (harassment, kidnapping, etc.)
			Crimes against property; (Robbery, theft, fraud, embezzlement, extortion, etc.)
			Crimes against sexual integrity; (sexual harassment, rape, etc.)
	Criminal activities against information and IT systems	Criminal activities against information and IT systems	Crimes against private sphere and business secrets (unlawful access to IT systems, misuse of access rights, etc.)

			Actual or potential unauthorised or unlawful access to personal data (GDPR breaches, etc.)
	Safety hazards (Accidents, natural disasters, etc.)	Safety hazards (Accidents, natural disasters, etc.)	Accidents at and out of work (fall, slipping, animal bites and stings, etc.)
			Accidents related to buildings or installations (fire, explosions, etc.)
			Transportation accidents (Air, water, land, etc.)
			Natural disasters (flood, earthquake, mudslide, etc.)
			Landmines, UXOs, etc
	Illness and injury of staff	Illness and injury of staff	Chemical hazards (Chemicals at the workplace exposure limits, are highly volatile, or are used in large quantities or in unventilated spaces, activities that may result in skin exposure to chemicals)
			Physical hazards (Exposures to excessive noise, elevated heat (indoor and outdoor) or sources of radiation (radioactive materials, X-rays, or radiofrequency radiation), epidemic - infectious/tropical diseases)
			Psychological hazards (Work-related stress due to context and working environment)
			Biological hazards (Sources of infectious diseases, moulds, toxic or poisonous plants, or animal materials (fur or scat) capable of causing allergic reactions or occupational asthma)
			Ergonomic hazards (Heavy lifting, work above shoulder height, repetitive motions or tasks with significant vibration)