



NORWEGIAN HUMAN RIGHTS FUND

ETHICAL GUIDELINES OF THE NORWEGIAN HUMAN RIGHTS FUND

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Introduction

The Norwegian Human Rights Fund (NHRF) works to uphold a high ethical standard for its operations and does so with a strong focus on the wellbeing of its staff and grantee partners. We are committed to adhering to and promoting anti-corruption measures and ensuring environments where safeguarding principles, including on sexual exploitation, abuse and harassment (SEAH), are implemented and all people involved in our work are protected and feel safe.

Purpose

This document compiles our work and processes related to these matters into a set of guidelines to demonstrate how we proactively work on these issues with our staff and grantee partners.¹ Our ethical guidelines are guided by and in accordance with all international human rights standards and the *International Labour Organization's* (ILO) fundamental conventions on international labour standards.

As an organization that has grown out of Norwegian civil society with a core mandate to protect human rights internationally, the NHRF is guided by the international human rights framework and our responsibilities and values naturally stem from these. We have a wide range of legal, ethical, and moral responsibilities towards people who have a direct interest in our work, including people that we work with, aim to represent, protect or to assist. The provision of grants creates unequal power dynamics that can be abused. It is necessary that grantmakers and service providers enjoy mutual trust in order to serve our target groups. These guidelines aim to prevent and counteract abuses of power, promote trust and integrity and to suggest concrete ways to foster a safe and inclusive working environment.

These ethical guidelines will be reviewed annually together with the NHRF Code of Conduct to ensure their efficacy in the purpose of comprehensive protection of and guidance to staff, consultants and other non-staff personnel, grantee partners and any third parties involved in activities of the operations of NHRF. It is mandatory that these guidelines be read by all staff before signing a working agreement with the NHRF, and they are available on the NHRF website. The NHRF ensures training of staff on an annual basis and that there is awareness of the principles contained within the guidelines among all within the organization.

Scope

These guidelines apply to all NHRF staff, Board and Advisory board members, consultants, interns/volunteers, and agents working on behalf of the NHRF as part of project work, during missions, travels or during free time while travelling on behalf of the NHRF. The guidelines extend to the work and goals of our grantee partners via the NHRF secretariat and NHRF Colombia office as the responsible parties for supported projects.

Respect for human rights and the environment

The NHRF's mandate is to protect and promote human rights internationally by being a flexible and courageous actor that provides direct financial support to local organizations working in the front lines for the rights of marginalized and vulnerable individuals and groups. Respect for human dignity is also at the very heart of what we do. Every person has inviolable rights enshrined in the Universal Declaration of Human Rights, and the NHRF is committed to respecting these values and fundamental principles in our daily work and with any persons we engage with.

¹ This document compiles NHRF's existing resources that have been written by members of the secretariat, shared by our member organizations, or other external stakeholders. The Ethical guidelines are reviewed by NHRF's board and is to be reviewed on a yearly basis.

Equality and non-discrimination

Equality and non-discrimination are central principles which can be found in all the core international human rights instruments and specialized treaties. Promotion of gender equality, reduction in general inequality and the empowerment of women and other marginalized groups is recognized by the UN as a crucial element of the 2030 sustainable development goals. These are both guiding values in our daily work and in our project work, and the NHRF has a formal duty to implement safeguards and not to discriminate in relation to employment, wages, training, promotion, dismissal or retirement on the basis of race, ethnicity, caste, culture, religion, age, disability, gender, civil status, sexuality or sexual preference, union work or political affiliation.²

Gender equality and diversity

The NHRF recognizes the expansiveness of gender identities and the compounding discriminations against women, LGBTQ+, and other diverse genders for their intersecting identities. Thus, we seek to apply an expansive and wholly non-discriminatory gender lens to all aspects of our work. The NHRF uses the definition of *Gender Equality* as provided for by UN Women and we are including the solution-oriented definition of gender equality provided for Sustainable Development Goal 5 as it is directly linked to the actionable goal of achieving gender equality.

SDG-5 states that providing women and girls with equal access to education, health care, decent work, and representation in political and economic decision-making processes will fuel sustainable economies and benefit societies and humanity at large. Implementing new legal frameworks regarding female equality in the workplace and the eradication of harmful practices targeted at women is crucial to ending the gender-based discrimination prevalent in many countries around the world.

The inclusion of this definition is NHRF-specific as we seek to prioritize women-led organizations for funding and assess the balance of women in leadership as a priority eligibility criterion as well. In addition, we have rigorous monitoring, evaluation, learning and development (MELD) procedures that monitor and collect data on gender from our projects, and we use these tools in a continuous effort to improve our systems and procedures on gender and diversity. The NHRF has a separate gender equality policy that gives further guidance on this.

Environmental considerations

The NHRF recognizes environmental protection as one of our guiding principles and as an important crosscutting issue in fund management and grant-making. We operate in compliance with relevant environmental legislation in the countries we work and strive to improve our environmental performance steadily and to initiate additional projects and activities that will further reduce our impact -and that of our grantees - on the environment.

We are committed to incorporate environmental concerns and impacts into our decision-making and activities and raise environmental awareness among our employees and grantees and encourage them to work in an environmentally responsible manner.

Labour rights and avoidance of child labour.

The NHRF adheres to international labour standards detailed in relevant conventions by the ILO. The NHRF will never engage in any form of forced labour, slave labour or involuntary labour. All employees shall, without exception, have the right to join or establish trade unions of their choice and to bargain collectively. The NHRF does not endorse any type of child labour, in line with the UN Convention on the Rights of the Child.

² See our Policy on Gender and Gender Equality

NHRF values

The three values that guide the work of the NHRF are courage, flexibility, and solidarity.

Courage signifies that we aim to be forward-looking and brave, and that we are willing to take calculated risks to carry out our mandate.

Flexibility signifies that we focus on finding solutions to carry out our mandate and that we aim to adapt to meet the needs of grantee partners and their locally anchored solutions. It also signifies that we aim to think outside the box within the NHRF and with actors like donors, partners, and decision makers. It also serves to remind us that we want to continue to be a flexible grant maker and human rights actor.

Solidarity is important both internally and externally. It says something about how we want to treat each other inside the NHRF and how we want others to experience us in their interaction with us. It also signifies the fact that we want to respect and support locally anchored and locally owned initiatives, and that we want to respect grantee partners' input in our advocacy efforts, in our communication work and all aspects of our work.

Safeguarding, including for sexual exploitation, abuse, and harassment (SEAH)

The safety of human beings in situations of vulnerability is of paramount importance to the NHRF and these guidelines aim to ensure that the NHRF is doing as much as possible to prevent possible direct and indirect harm and abuse to any human being. The NHRF does not tolerate violations of the rights of individuals by employees, volunteers, or any person directly or indirectly involved with the NHRF.

Safeguarding work is linked to the working conditions in our own organization and within our grantee organizations. Therefore, the NHRF expects all grantees to contribute in a proactive, preventative, and positive way to ensure a safe environment for people engaged with their work and to strictly adhere to a policy of zero-tolerance for discrimination and all forms of harassment and abuse, including sexual harassment, abuse and exploitation. All our grant recipient contracts include the following provision:

"The Grant Recipient declares its commitment to counteract exploitation or harassment of any kind, including sexual harassment, within their organization (meaning staff, volunteers, and people hired to work for the organization) and in their contact with target groups in their work, as well as to work for ensuring good preventative systems and routines. The Grant Recipient shall immediately inform the NHRF of reports of harassment and undertake rapid action to initiate adequate response."

In the NHRF, we act with the following definitions:

- (1) **Safeguarding:** Ensuring that the representatives and activities of the NHRF will not negatively impact the individuals that we work with. It also refers to our responsibility to reduce risks and the exposure to risks, to prevent violations and to act on reported violations.
- (2) **Abuse:** Abuse may consist of several forms and the circumstances in which they take place for the individual must always be considered. For example:
 - a. Physical abuse where an individual may be exposed to hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint and inappropriate physical sanctions.
 - b. Sexual abuse where an actual or threatened physical intrusion of a sexual nature by force or coercive conditions.

- c. Financial and material abuse including theft, fraud, exploitation, and pressure in relation to wills, property, inheritance, and financial transactions, or inciting someone to do any of these on someone's behalf. It also includes the misuse or misappropriation of property, possessions, and benefits of an individual.
- d. Discrimination, slurs or hate crime/incident based on someone's race, gender, cast, disability, faith, sexual orientation, or age.
- e. Domestic abuse considers any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those who are, or have been, intimate partners or family members regardless of gender or sexuality.³

- (3) **Harassment and sexual harassment:** The NHRF operates with the UN's definition of harassment and sexual harassment.⁴ Harassment is any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate, or embarrass another or which create an intimidating, hostile or offensive work environment.

Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

- (4) **Sexual exploitation:** The NHRF operates with the UN definition on sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This also extends to other international standards on the prohibition of sexual relations with children (defined as under 18 years old) or with beneficiaries of NHRF-funded activities, recognizing the inherent unequal power dynamics involved. In addition, the exchange of money, offers of employment, goods or services for sex or sexual favours with any individual is included in this definition and is prohibited for all staff or representatives of the NHRF, with the understanding that these standards exist to challenge sexually exploitative and abusive behaviours.

While safeguarding is everyone's responsibility and failure to act on concerns relating to an individual at risk is not an option. The NHRF's management and ultimately our Board of Directors hold overall responsibility for the implementation of all policies, including our safeguarding principles.

What we do to ensure our guidelines are recognized:

- ✓ All NHRF's employees and representatives are obliged to adhere to our code of conduct including safeguarding principles at all times and are obligated to report any suspicions of abuse of individuals. The content of the Code of Conduct and ethical guidelines are shared annually with all staff.
- ✓ The commitment to NHRF's safeguarding principles is also included as a requirement in all grant contracts.

³ UK Home Office Guidance: Domestic Violence and Abuse

⁴ <https://www.un.org/womenwatch/osag/new/fpsexualharassment.htm>

- ✓ The NHRF's [guidelines on safeguarding](#) also offer concrete information and steps on how organizations can develop their own safeguarding policies, what preventative measures to undertake, and how to develop better systems to support victims and survivors.
- ✓ In our communication with grantees, the NHRF will ensure that all grantees familiarize and commit themselves to our safeguarding principles.

Anti-fraud and corruption principles

Efforts to prevent corruption and mismanagement of resources are fundamental to the operations of the NHRF, and the NHRF works to ensure that the funds we receive from our donors and contributors are spent according to plans and agreements. The NHRF continuously works to maintain a high ethical level in its operations, focusing its efforts on staff and their partners' well-being and ensuring the continuous improvement of anti-corruption measures, guaranteeing environments in which safeguard principles keep safeguards protected people involved in our work.

The NHRF expects all staff and others working or acting in the name of the NHRF, as well as our grantee partners, to prevent and proactively work against corruption and financial mismanagement, and to strictly comply with our anti-corruption policy, including our policy of zero-tolerance of corruption.

Corruption is, defined a dishonest or criminal offense committed by a person or organisation entrusted with a position of authority, for illicit gain or abuse of power for personal growth. Corruption is often related to illegal financial gains but may also be used to describe situations where there are close ties between parties, abuse of power or dual roles. Corruption is furthermore a breach of trust for the target group and communities we wish to support. Corruption is often linked to bribery, accepting gifts, other payments, sexual exploitation and abuse or fraud.

The NHRF has embedded in all our grantee partner contracts a zero-tolerance policy against corruption that grantees agree to upon signing:

"The Grant Recipient declares its commitment to counteract corrupt practices in the execution of the contract. Further, the Grant Recipient commits itself not to accept, either directly or indirectly, as an inducement or reward in relation to the execution of the contract, any kind of offer, gift, payments, or benefits, which would or could be construed as legal or corrupt practice. The Grant Recipient shall immediately inform the NHRF of any indication of corruption or misuse of resources related to the project, and undertake rapid legal action to initiate investigations of an prosecution, against and in accordance with applicable law any person subject or misuse of resource related to the project."

Allegations of corrupt practices shall be reported immediately and directly to NHRF, or through our reporting form on the NHRF website ([link](#)). The NHRF will note the report or complaint and decide whether to take action. We will take all reports and complaints seriously and treat them individually. It will not always be necessary to contact the person submitting the report and this will be decided in each individual case. The NHRF reports cases to our donors. Cases where corruption has been proven can result in termination of contracts, repayment requirement and/or reporting to relevant authorities for criminal prosecution.

The NHRF supports a wide variety of organisations that have different practices and levels of financial management. As such, the NHRF has developed the [Financial Management Guidelines](#) to guide our grantees in their financial management. The manual sets out a series of principles and practices to be applied when managing funds provided by the NHRF and offers concrete steps in financial management such as planning, organizing, controlling, and monitoring the financial resources of an organization to achieve objectives. In the handbook, you can find guidance on:

- ✓ Budgets, accounting, payment procedures, and procurement
- ✓ Accountability and compliance
- ✓ Financial monitoring
- ✓ Financial report and audit.

The financial management guidelines are part of the NHRF's efforts to prevent corruption and mismanagement of funds.

Integrity, including conflict of interest

All NHRF staff shall:

- conduct all official duties with integrity, free from any dishonesty or corruption, including not engaging in any act of favouritism, nepotism, or bribery. This includes unfair treatment of a person or group on the basis of prejudice, support or favour shown to friends and family, offer or consideration of any improper personal benefit.
- not accept from any external source without authorization, any honour, gift, remuneration, favours, or economic benefit which is more than a "token gift" not allow any opportunity for any conflict of interest. Any potential conflict of interest with a supplier, service provider, project partner or business partner (such as family relations or shareholding) must be disclosed to the line manager or other members of the management group.
- report to the line manager or other members of the management group when fraud, corruption or dishonest behaviour is suspected.
- at all times be subject to Norwegian legislation against corruption.

Security Guidelines

Central to the NHRF's work in promoting human rights is the security, protection and adequate working conditions for grantee organizations and human rights defenders (HRDs). The NHRF has always emphasized the importance of security and protection on an individual and organizational level and will continue to maintain this focus as a core element of our strategy. The [NHRF security guidelines](#) explain the normative framework for NHRF's overall work on the protection and support to HRDs and human rights organizations and provide an overview of some of the available support mechanisms for defenders at risk. It aims to ensure that our grantees have the resources to develop security plans and proper strategies to manage security risks, help grantees establish contact with national and international protection actors, and to ensure that NHRF staff and local consultants have the capacity and network needed to respond to our grantee partners' security requests. The guidelines offer comprehensive instructions and steps on personal and organizational safety measures, how to conduct risk and threat analyses, rules and responsibilities, national and international protection support mechanisms and provides additional external network and guidelines on support to HRDs.

How the NHRF works to uphold a high ethical standard

The NHRF has several measures and resources that serve to uphold and promote a high ethical standard in work. Some are meant as tools for staff, while others serve as guiding documents and resources for grantee organizations.

Code of Conduct for NHRF staff

The NHRF's capacity to promote our mandate to protect human rights internationally depends on the ability of our staff to uphold and promote the highest standards of ethical and professional conduct. It is therefore important in hiring processes that the NHRF ensures that staff, including local consultants, have high integrity and a good track record. Our staff are personally and collectively responsible for upholding these standards and all are expected to act in accordance with the principles and values stated in these ethical guidelines. As such, all staff, consultants, interns, board and advisory board members and other people working with the NHRF are obligated to sign the NHRF Code of Conduct, which sets out a series of principles based on the NHRF's core values and international and national legal standards. The Code of Conduct is designed to serve as a guide for all staff on how to maintain the ethical foundation of this organization's views and action. The NHRF Code of Conduct is a binding document and failure to adhere to any of the provisions set out in the document may result in disciplinary action, dismissal, or even legal action. It is recognized that the NHRF's work often creates power dynamics and places staff in positions of power in relation to each other and with our grantee partners and beneficiaries. All staff and NHRF representatives have an obligation not to abuse this power.

Guidelines and resources for NHRF grantee partners

The NHRF enters agreements through written contracts with its partners and grantees. The contract(s) stipulate the terms of our financial support and includes components of financial and programmatic expectations, as well as provisions on anti-corruption and safeguarding that reflect our ethical foundation, and core values and clearly states that we expect all grantee partners to adhere to the policies within the contract and to take action if there are breaches. In addition, we have several resources and guidelines that are integral components of our work with our grantee partners, such as the Financial Management Guidelines for NHRF Grantee Partners, the Security Guidelines, and Guidelines on Safeguarding for Grantee Partners.

Consequences of violating the Code of Conduct or contracts

Any NHRF staff, Board or Advisory board members, consultants, interns/volunteers, or agents working on behalf of the NHRF that violate any of our ethical guidelines may face investigations or warnings. In the case of a staff member breaching our ethical guidelines or code of conduct, this will be treated as a professional conduct matter between employer and employee, and can result in a warning, termination of contract, immediate dismissal depending on the severity of the breach, or even criminal prosecution. Elected officials can be suspended depending on the severity of the breach in accordance with the NHRF organizational statutes. Anyone representing the NHRF while travelling and committing a breach of our guidelines, could face potential calls for economic compensation or termination of further collaboration. Any acts in violation of Norwegian or local law will be reported to relevant authorities.

Grantee organizations that are found to have violated our ethical guidelines or the provisions in our contract referring to this subject matter, may face investigations, termination of contracts, cessation in funding, or reporting to authorities. The NHRF will also seek to provide support to staff members of grantee organizations that have been victims of abuse or harassment within their organizations and refer the case to relevant authorities or refer victims to local support mechanisms/organizations.

Reporting procedures

For NHRF permanent and temporary staff, consultants, and volunteers, we have internal written whistleblowing and reporting routines. Staff are encouraged to report on concerns of behaviour that are in violation of our ethical guidelines and code of conduct. Allegations of misconduct can be reported

through [the online submission form](#), or directly to the HMS representative, elected union representative, the line manager, Country Director or Executive Director. Allegations towards the Executive Director shall be reported to the Chair of the Board. Principles that inform our reporting routines are confidentiality, impartiality, and the right to challenge each allegation in a fair and just manner. The NHRF has a victim/survivor-centred approach to reporting procedures. In the case of a report of misconduct directed towards any of our staff members, it is the Executive Director or the Chair of the Board who are responsible for investigating and handling the inquiry. During the investigation, the responsible shall:

- Maintain discretion and confidentiality throughout the entire process and ensure personal information and privacy related issues of all parties involved are protected,
- Maintain a safe working environment and protect the involved parties from retaliation during and after the investigation,
- Seek inquiry with all involved parties in a timely manner,
- Document the process thoroughly,
- Take appropriate action.

Any other external NHRF stakeholder, such as staff or volunteers of grantee organizations, partner organizations, beneficiaries, or any other agent with a relation to any of the NHRF's grantee organizations, can report on concerns of misconduct directly to us.

On the NHRF's website ([link](#)) we have an online submission form for whistleblowing where it is possible to report misconduct, fraud or abuse related to NHRF's staff, grantees and work. All reports of misconduct are safely saved on our website server with access provided only to our Executive Director. The submissions via this website form are checked at least every two weeks, by the Executive Director. Other ways of reporting misconduct can be directly to NHRF staff. Programme advisers are free to also report directly to the Head of Programme, Country Director, or Executive Director, or in cases where this is deemed best, to the chairperson of the Board. NHRF staff will keep the information confidential. All reports are dealt with on a case-by-case basis and investigated according to our internal whistleblowing and reporting routines, ensuring a victim/survivor centred approach.