

Report in accordance with the Transparency Act

2026



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Norwegian Refugee Council

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Cover photo: Educational Activity, West Bank, December 2025
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1 Introduction

This report explains the actions taken by the Norwegian Refugee Council (NRC) from June 2025 to June 2026 to comply with the requirements of the Norwegian Transparency Act (**the Act**).¹

The Act requires an organisation to publish an annual account of the due diligence it has undertaken 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 the organisation is structured
- how NRC manages adverse impacts
- actual adverse impacts NRC has experienced during the last year
- identified potential risks of adverse impacts, and
- planned measures NRC will take to mitigate these risks.



Member of the Qabobe farmer cooperative in Galkacyo, Galmudug, Somalia.

February 2026, Abdulkadir Mohamed/NRC

1.1 What does NRC do?

NRC is a global 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, in 1946. Today, we work in both new and protracted crises across more than 40 countries. We specialise in six

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>

areas: livelihoods and food security, shelter and settlements, information, counselling and legal assistance, education, protection from violence, and water, sanitation and hygiene promotion.

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



Children playing inside their family's poultry house, Afghanistan, March 2026. Maisam Shafiey/NRC

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 countries of operation, and a small number are based at the Head Office in Oslo, and in select regional and capital hubs.

2.2 How is NRC structured?

NRC is a Norwegian **foundation** (*stiftelse*) but also has separate legal entities in some countries. Our head office is situated in Oslo. We have **representation offices** in Belgium, Germany, Switzerland, the UK and the USA.

Our country offices are responsible for managing and delivering programmes in **38 countries** across the globe. Regional teams are based in Colombia (Latin America), Jordan (Middle East and North Africa), Kenya (East and Southern Africa) and Senegal (Central and West Africa). Our Europe and Asia regional team works remotely.

2 How we manage adverse impacts

NRC is a **rights-based organisation** and **international human rights standards underpin our work**. 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.

2.1 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	Explains NRC's zero tolerance approach to all forms of corruption and how corruption is prevented and tackled throughout the organisation.
Code of Conduct	Explains the standards of behaviour which all staff must comply with. Some third parties working with NRC, such as consultants, are also required to sign a Code of Conduct for non-staff representatives.
Community Engagement and Accountability (CEA) Policy	Commits NRC to community engagement and accountability to affected people. Community Feedback Mechanisms (CFM) are a central part of this approach, ensuring that communities can provide feedback on any matter important to them, receive timely responses, and seek redress.
Community Feedback Mechanism (CFM) Handbook	Provides practical guidance for establishing and managing CFMs and includes a practical toolkit for context-specific implementation.
Inclusion and Gender Policy	Explains NRC's commitment to promote inclusion and gender equality into every aspect of our work.

Humanitarian Access and Safety Policy and associated procedures	Explains how NRC assures the safety and security of our staff and the people we work with.
HR Handbook and associated procedures	Explains the employment standards and minimum requirements which must be followed when employing staff throughout the organisation.
Logistics Handbook and associated procedures	Explains the procurement and other logistics 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	Explains how NRC works with different types of implementing partners. Includes procedures for carrying out due diligence when identifying suitable partners.
Personal Data and Privacy Policy and associated procedures	Explains NRC's commitments to protecting personal data under its control and ensuring the rights of the individuals whose data is being processed.
Risk Management Policy and associated procedures	Sets 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.
Safe and Inclusive Programming (SIP)	Provides procedures to ensure the safe and effective delivery of programmes.
Safeguarding Policy and associated procedures	Explains NRC's zero tolerance to inaction on sexual exploitation, abuse and harassment (SEAH). States 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	Explains how staff, partners, suppliers and others can safely report concerns to NRC if they become aware of suspected wrongdoing within the organisation and how concerns are acted on.

2.2 Appropriate staffing

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

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



NRC staff member speaking to children, Syria
February 2026 Tareq Mnadili/NRC

Team	Responsibility
Data Protection Officer	Ensures individual's data is processed and protected in compliance with data protection laws
Humanitarian Access and Security	Ensure the policies and procedures are in place to manage risks related to the safety and security of staff and the people we work with
Integrity Unit	Processes reports of and manages investigations into allegations of staff misconduct
People and Organisation	Ensures ethical and appropriate HR procedures
Programmes	Ensures ethical and appropriate procedures for project participants, including the implementation of Community Feedback Mechanisms Ensures safeguarding in programming
Risk Management	Ensures processes to identify, assess, monitor and report on all risks, to address high-risk issues Responsible for the Speak Up system Ensures that safeguarding is mainstreamed throughout the organisation
Supply Chain Management	Ensures due diligence during logistics and procurement processes

Staff at country offices including supply chain management, finance, health safety and security, human resources, and programmes, are responsible for **implementing the procedures** developed by the global and regional teams; **adapting them appropriately** for the context in which they are to be applied; and **ensuring compliance**.

NRC also has risk and compliance staff in place across the organisation to support management in identifying and addressing high-risk issues, which include adverse risks as defined by the Act.

2.3 Managing risks

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

There are **global** (enterprise) 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.



NRC staff member visiting project participants, Ukraine
January 2026, Inha Musiiuk/NRC

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. Mitigation measures are put in place to reduce the risks, and the risks are continually monitored at the appropriate level.

2.4 Managing risks to 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 reflects how NRC designs, delivers and evaluates 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 a 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.



Newly arrived displaced families at Umdulu Camp reception area, Sudan
January 2026, Karl Schembri/NRC

2.5 Receiving and managing incidents and concerns

NRC has **incident management processes** which govern how different types of incidents and concerns are received and handled.

Safety and security incidents, including data breaches, are reported in a closed digital solution and managed in accordance with the applicable procedure.

Concerns related to alleged staff misconduct are managed within NRC's Speak Up (whistleblowing) system. Reporters can report anonymously if they wish. Speak Up is managed at the global level by the Integrity Unit who sit within the Risk Management section. Reports to Speak Up can be

submitted via email or an online form, or through a trusted manager where these channels are not accessible.

Once a concern is received to Speak Up, the Integrity Unit 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.

Project participants and communities are encouraged to use the local **Community Feedback Mechanism (CFM)** channels to report any feedback, including complaints about NRC programmes, or other types of concerns. CFM channels are designed to accommodate community preferences and contextual needs including the ability to interact in local languages. They can also report using Speak Up if they prefer. Allegations of staff or representative misconduct are transferred to the Speak Up system for handling.



Better Learning Programme in New Light School, Kakuma, Kenya
September 2025, Heritier Elelwa/Youth Voices Kakuma for NRC

3 Actual adverse impacts

In the previous year, NRC has experienced the following adverse impacts:

3.1 Allegations into the Speak Up system

In 2025, NRC received a total of 499 reports to its Speak Up system. Of these:

- 237 were transferred to other departments for follow up according to the relevant procedures
- 182 were Speak Up cases that were investigated, broken down as follows: Safeguarding (28), Corruption (127), and other ethical issues (27) and
- 80 were still in processing at the end of the year.

NRC also closed 114 investigations. Of these:

- 35% were substantiated
- 25% were not substantiated
- 10% were unproven
- 30% are still being processed

3.2 Safeguarding

During 2025, NRC investigated a total of 28 Safeguarding cases. This includes sexual exploitation, sexual harassment, and sexual abuse as well as bullying and harassment.

3.3 Corruption cases

NRC produces an **annual report on corruption cases** involving NRC staff, which is available [on our website](#).

3.4 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



NRC staff member visiting Sudanese refugees in Chad, April 2026. Enayatullah Azad / NRC

items from local suppliers. NRC signs an ethical declaration with suppliers, requiring them to comply with certain standards, for example concerning working conditions. If suppliers fail to meet these standards, NRC may work with the supplier to build their capacity to comply or may terminate the contract.

3.5 Environmental impacts

NRC's environmental impact has direct implications for the communities we serve. We are committed to integrating environmental considerations into our decision-making and working with communities to reduce harm. We have committed to reducing our carbon footprint by 20% per staff member by 2030, with a continued focus on reducing emissions from travel, vehicles and generator use.

Substantial progress has been on reducing operational emissions (fleet, energy and travel) which in 2025 has reduced by 41% per staff member from our baseline. More resource efficient programmes approaches have resulted in delivery of more aid per staff member and consequently more programme emissions per staff member, offsetting some of our other progress. We continue to work towards more carbon efficient ways of operating.

In 2025, we launched a gamified training programme to support staff in reducing energy use across operations. In 2026, we will roll out additional training to help staff integrate environmental criteria into procurement decisions.

We publish an [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.

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 project participants

As a certified organisation against the [Core Humanitarian Standard](#) (CHS), NRC has clear accountability commitments towards project participants, alongside our obligation to uphold ‘do no harm’ principles.

NRC has **one identified global risk** in the global risk register that brings 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.



Families receiving property certificates for their homes, Honduras
November 2025, Ariel Sosa/NRC

4.1.1 Current measures NRC is taking to manage these adverse impacts

NRC’s main measure to manage the identified risk to project participants is an **action plan** to implement NRC’s approach to ‘**Safe and Inclusive Programming**’ (SIP).

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 project participants throughout the project cycle

- safe management of facilities and services, and
- setting up accessible, safe and confidential CFMs.

4.1.2 Improvements that NRC will make to manage these adverse impacts

NRC has finalised a new Community Engagement and Accountability Policy and Community Feedback Mechanism Handbook. These have been rolled out during 2025 and the roll out will continue in 2026. The new Safeguarding Policy and Minimum Requirements is also being rolled out in respect of project participants.

4.2 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 enterprise risks** in the corresponding 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.

4.2.1 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 and obtaining informed consent from staff
- training staff on how to work in hostile environments
- managing critical staff incidents when they do occur
- tracking incidents that affect our staff in order to learn, adapt and ensure mitigation measures in the future
- ensuring minimum operating standards based on risk levels, e.g. minimum staff levels and required trainings.



NRC delivering emergency aid in Mueda, Mozambique, October 2025. Enayatullah Azad/NRC

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

- doubled the reach of staff **hostile environment awareness training** since 2023
- improved **travel and reporting system** introduced for staff
- introduced a **new Integrity Unit** to manage reports made to the Speak Up system
- introduced a **new case management system** for managing Speak Up complaints

4.2.2 Improvements that NRC will make to manage these adverse impacts

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

- further **improvements to the Speak Up system**, including continued awareness raising among staff
- roll out of **updated Code of Conduct** for staff
- continued rolling out of the **Safeguarding Policy** and the **Safeguarding Framework**
- further training for staff on adverse impacts including on the new Code of Conduct and HEAT training
- introduction of a CFM self-assessment tool for country offices to strengthen oversight and alignment with the new CFM Handbook, supporting the identification of gaps and risks in how feedback and complaints are managed.

4.3 Adverse impacts and partners

NRC partners and coordinates with a wide variety of organisations, including UN organisations, international non-governmental organisations, local non-governmental organisations, universities, local and national governments and local private sector 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 more with local actors**. This brings significant benefits, including:

- complementing the efforts and interventions of local actors and systems
- building relationships and trust and increasing 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.

Working with partners creates opportunities. At the same time, these partnerships also involve risks that must be carefully identified and managed. NRC has identified **three global risks** in 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



Distribution of core relief items to people seeking shelter, Bekaa, Lebanon
March 2026 Nancy Bou Diab/NRC

In addition, local partners may not have the same capacity to identify and manage adverse impacts.

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 an organisational assessment tool (OAT) when conducting due diligence on partners, and
- communicating NRC's Code of Conduct to partners.

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

- developed safeguarding tools and tailored training for partners
- provided practical guidance to help local partners strengthen safety and security risk management
- strengthened programme quality assurance and monitoring in partnership projects
- provided targeted support to partners on financial management and compliance requirements



Solar energy system for Thobhan water scheme, Yemen
July, 2025 Khalid Al-Banna/NRC

4.3.2 Improvements NRC will make to manage these adverse impacts

Working together with partners and strengthening their capacity to manage adverse impacts is a key ambition for NRC, considering that each partnership requires a tailored approach, as partners have different strengths, resources and needs. More will be done to strengthen our tools and processes, to train staff in how to effectively support partners with targeted training in specific areas such as safeguarding or security management.

Moreover, NRC will continue to advocate to donors for more risk-sharing approaches, enabling greater flexibility and ensuring adequate resources for

capacity support including sufficient overheads coverage for partners to invest in their own organisational development.

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 NRC's Logistics Handbook.

NRC has identified **three global risks** in 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

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 suppliers
- conducting due diligence on suppliers, and
- communicating NRC's Code of Conduct to suppliers.

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

- **updated the ethical standards declaration-** all suppliers must sign an updated ethical declaration. The wording on this has been strengthened and suppliers are provided with specific tools to notify NRC in writing of potential conflict of interest.

4.4.2 Improvements NRC will make to manage these adverse impacts

NRC plans to continue improving our systems for identifying and mapping high risk suppliers, such as transportation, clothing and water trucking.



NRC warehouse in Egypt preparing to dispatch critical humanitarian supplies to Gaza.
October 2025, Enayatullah Azad/NRC

Annexe 1 NRC's Risk Categories

Risk category	Definition	Risk type	Definition
Contextual risks	Characteristics or actual changes to characteristics of the external context of operation (area, country or regional context) that pose a threat to the operation.	Political	Characteristics or actual changes to the characteristics of the political systems of the operation in term of state structure, governance and policy-making process, both formal and informal that may pose a threat to the operation.
		Economic	Characteristics or actual changes to the characteristics of the macroeconomic conditions in the context where operations take place, such as inflation, interest rates, foreign exchange rates, unemployment, etc. that may pose a threat to the operation.
		Social	Characteristics or actual changes to the characteristics of the social interactions, perceptions, dynamics or conditions of the external context of operation that may pose a threat to the operation.
		Technological	Characteristics or actual changes to the characteristics of the technological systems and infrastructure of the context of operation that may pose a threat to the operation.
		Environmental context	Characteristics or actual changes to the characteristics of the physical environment of operation that may pose a threat to the operation. Environmental context risks are different from risks of causing harm to the environment.

		Legal context	<p>Characteristics or actual changes to the characteristics of the legal operating environment that may pose a threat to the operation.</p> <p>Legal context risks are different from non-compliance risks.</p>
Programme support and compliance	Risks related to processes that support the implementation of programme activities such as finance, supply chain, human resources and ICT processes.	Resources and capacity	Inability to secure the financial, human, information (data) resources and tangible assets required to conduct operations.
		Reputational	Negative information or perceptions damaging integrity or credibility of the operation.
		Legal and compliance	Inability to comply with internal and external requirements and applicable regulation.
		Corruption	Potential cases of abuse of entrusted power for personal gain by NRC staff and other representatives.
		Misconduct	Potential breaches to NRC's code of conduct affecting operations.
Safety and Security Risks	Risks of external threats or hazards intentionally or unintentionally compromising the	Accidents related to work infrastructure	Risks to NRC's staff and property caused by accidents occurring in infrastructure managed by NRC. Note that accidents involving project participants are of the "do no harm" type (see programmatic risks) even when occurring in infrastructure managed by NRC.
		Climatic events	Risks to NRC's staff, property, assets or operations caused by climatic events
		Coercive practices	Risks to NRC staff caused by coercive practices

	wellbeing of NRC staff, damaging NRC's property or resulting in loss of NRC's assets.	Combat and Hostilities	Risks to NRC's staff, property and assets caused by armed conflict and warfare activities
		Epidemic or Pandemic	Risks to NRC staff and operations caused by a sudden increase in the number of cases of a disease above what is normally expected
		Information security	Risks to NRC's information (physical or digital) being damaged, lost or exposed. Note that risks related to data protection (e.g. data breaches) do not correspond to this risk type. See "do no harm" risks and "legal and compliance" risk types.
		Mis/disinformation	Any false or inaccurate information shared with the intent to harm NRC
		Property Crimes	Risks to NRC's property and assets caused by the unlawful taking or damaging of NRC's property
		Public Disorder	Risks to NRC's staff, property and assets caused by civil unrest and mass gatherings
		Violent Crimes	Risks to NRC's staff, property and assets caused by threat of or actual physical violence
		Work related illness and death	Risks NRC staff's physical or mental wellbeing affected by work related illness or risk of death of staff members that can be attributed to work related causes.
Humanitarian Access Risks	Risks related to NRC's ability to reach people in need as well as the	Bureaucratic and administrative impediments	

	ability of the affected population to reach our services, in a safe manner.	Conflict and criminality related impediments	
		Logistics and climate related obstacles	
Programmatic Risks	NRC defines programmatic risk as the potential for its responses to cause unintended harm to individuals, communities, or their environment, or to fail in meeting its programmatic objectives, including	Do no harm	<p>Risk of not following the do no harm principle and causing harm to the target population, while implementing programmes. These risks can be further divided into:</p> <ul style="list-style-type: none"> • Safety, dignity avoid causing harm: Risk of compromising project participant’s safety, dignity or well-being, avoid causing harm, at individual or community levels, in the delivery of our services. • Gender and Inclusion: Risk of marginalizing certain groups due to barriers to equitable access when programs fail to meet their specific needs, particularly from a gender and diversity perspective. • Community Engagement and Accountability: Risk of mistrust and reduced program acceptance, tensions, and ineffectiveness due to lack of community engagement and unaddressed concerns.

	by not responding when action is needed.		<ul style="list-style-type: none"> Environmental responsibility: Risks of causing environmental degradation through unsustainable programme design or delivery, including harmful use of natural resources, inadequate waste management, or failure to integrate environmental considerations.
		Relations with Stakeholders	<p>Risks emerging from the lack of strategic engagement with stakeholders for programme design and implementation. These risks can be further divided into:</p> <ul style="list-style-type: none"> Engagement with (implementing) partners: Challenges in identifying and engaging with strategic local partners with adequate capacity, alignment, and strategic fit, affecting program objectives. Coordination with other contextual actors: Risk of coordination failures with local authorities or inter-agency coordination challenges disrupting program coherence and impact, leading to resource inefficiencies and delayed assistance for project participants.
		Programme design and compliance	<p>Risks related to the design of our programmes, as well as compliance with internal and external quality and technical standards. These risks can be further divided into:</p> <ul style="list-style-type: none"> Lack of relevance and effectiveness of programme design: Compromising the relevance, effectiveness, and efficiency of the project or programme, due to inadequate analysis, objectives, etc. Non-compliance with NRC programme policies: Non-compliance of programme or project design with NRC policies and/or CC strategies. Programmes or projects that are out of the scope of NRC response policy.

		<ul style="list-style-type: none"> • Non-compliance with NRC technical programme standards: Lack of compliance with CC standards, technical standards, compromising programme quality and effectiveness.
	Programme implementation	Risks emerging from poor programme management or challenges with allocation of resources.