Report in accordance with the Transparency Act

2025

NRC NORWEGIAN REFUGEE COUNCIL

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Dated: 3 June 2025, updated 22 August 2025

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Cover photo: Staff explaining to project participants in Colombia how to contact NRC using the local Community Feedback Mechanism.

Daniel Pabón/NRC

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1 Introduction

This report explains the actions taken by the Norwegian Refugee Council (**NRC**) from June 2024 to June 2025 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.

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 more than 40 countries. We specialise in six 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

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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

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.

NRC vehicle in front of a school in Mabalako, DRC.
Photo credit: Marion Guenard/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 field, and a small number are based at the Head Office in Oslo.

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** 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)

NRC programvirksomhet
NORCAP utplasseringer 2023
Regionale kontor
Representasjonskontor
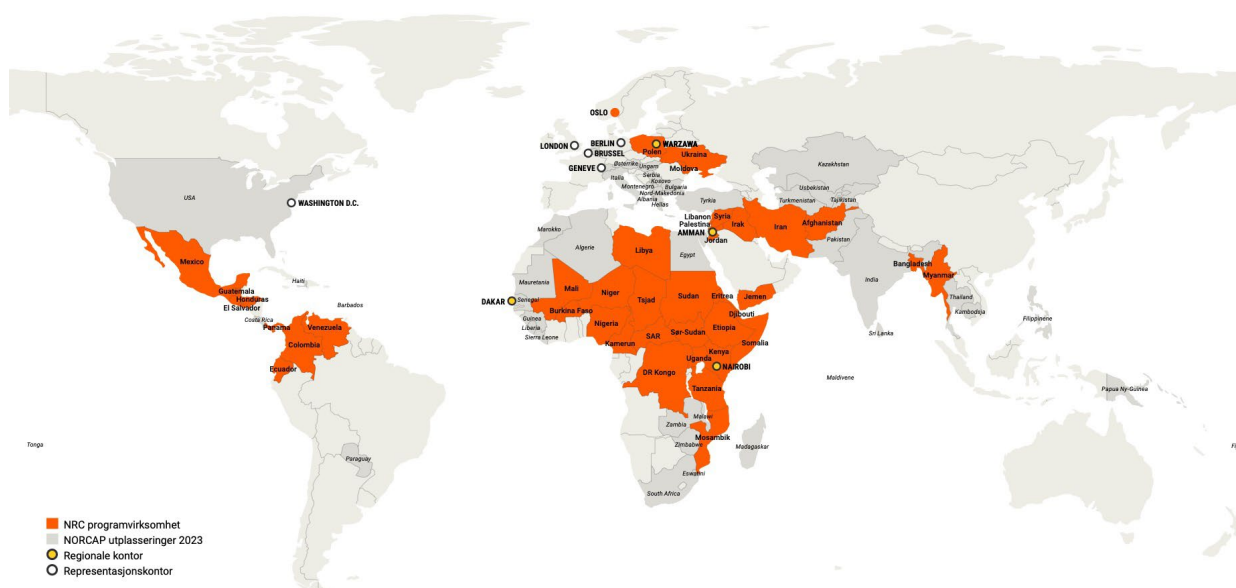
2 How we manage adverse impacts

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.
Community Feedback Mechanism Policy and associated procedures (**CFM**)	A system that empowers the communities and individuals NRC works with to share their views, concerns and experiences of NRC and the wider humanitarian response.
Gender and Inclusion Policy	Explains NRC's commitment to promote inclusion and gender equality into every aspect of our work.
Health Safety and Security Policy and associated procedures	Explain how NRC assures the safety and security of our staff and the people we work with.
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 implementing partners. Includes procedures for carrying out due diligence when identifying suitable partners.
Personal Data and Privacy Policy and associated procedures	Explain 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	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.
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 concerns are acted on.

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
Data Protection Officer	Ensures individual's data is processed and protected in compliance with data protection laws
Investigations	Conduct investigations into allegations of staff misconduct and other wrongdoing
Health Safety 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
Partnerships and policies	Due diligence processes for partners
People and Organisation	Ensuring ethical and appropriate HR procedures
Programmes	Ensuring ethical and appropriate procedures for project participants, including the Community Feedback Mechanism Ensure safeguarding in programming
Risk management	Ensuring processes to identify, assess, monitor and report on all risks, to address high-risk issues. Responsible for the Speak Up system
Safeguarding	Ensure that safeguarding is mainstreamed throughout the organisation
Supply Chain Management	Ensuring due diligence during logistics and procurement processes

Staff at regional and country level in other teams, including supply chain management, finance, health safety and security, human resources, and programmes, are 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 **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.

NRC staff unloading hygiene kits in Colombia.
Photo credit: Milena Ayala/NRC

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. 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 management 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. Reporters can report anonymously if they wish.

Project participants and communities are encouraged to use their local **Community Feedback Mechanism (CFM)** to report complaints about NRC

programmes or other types of concerns. They can also report using Speak Up if they prefer.

Complaint and feedback box, Pygmées Aloya Primary School, North Kivu, DR Congo.
Photo credit: Marion Guenard/NRC

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)

During 2024, NRC received **83 SEAH-related allegations** (*Figure 2*). Of these, 80 were moved to fact finding or investigation (*Figure 3*) and 51 were substantiated.
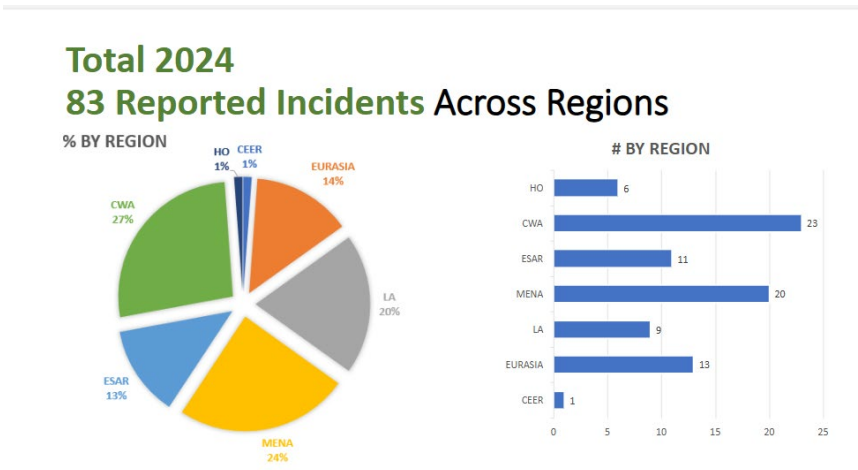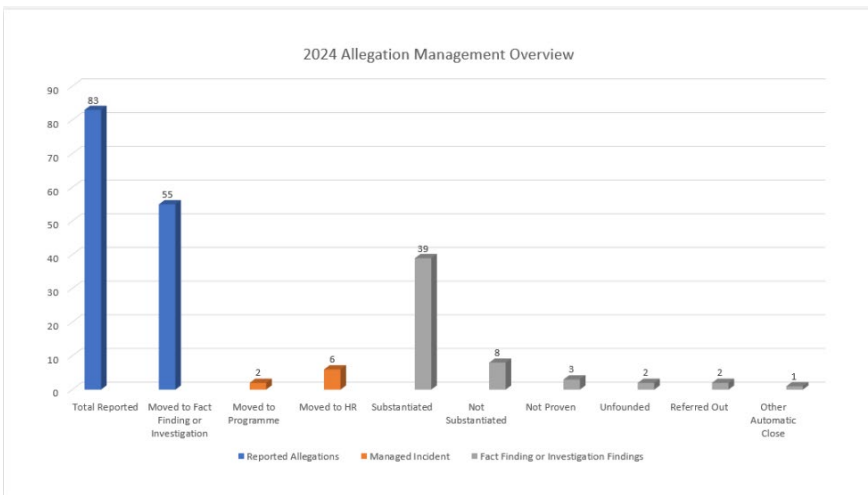

Figure 2

Figure 3

The number of complaints received in 2024 compares favourably to the number received in previous years (*Figure 4*).

Figure 4

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. 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.

3.4   Environmental impacts

NRC's impact on the environment has an immediate effect on the communities we serve. We are determined to include environmental considerations as part of all our decision making and work with communities to reduce harm. We have committed to **reducing our carbon footprint by 20% per staff member by 2030** and are currently focusing on cutting flight, vehicle and generator emissions. We have made steady progress towards this target, our current focus is transitioning from the use of diesel generators to solar power. We are implementing **Environmental Minimum Standards** and launching a **Waste Reduction initiative**.

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.

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 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 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.

Speaking to community members in Afghanistan.
Photo credit: Maisam Shafiey/NRC

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 enterprise risks** on 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.

Carrying out educational activities in the Central African Republic.
Photo Credit: Patricia POUHE/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 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
- ensure minimum operating standards based on risk levels, e.g. minimum staff levels and required trainings.

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

- **improved training** for staff on the Code of Conduct and safeguarding
- **new HR policies and processes** to improve working conditions, and the continued roll out and implementation of the **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** and the introduction of a new digital solution for managing reported concerns
- continued rolling out of the Safeguarding Policy and introduction of a new **Safeguarding Framework**
- further training for staff on adverse impacts, and
- producing a new Code of Conduct which will have even clearer behavioural requirements for staff on adverse impacts.

4.2 Adverse impacts and our project participants

NRC has obligations towards our project participants based on the [Core Humanitarian Standard](#) (CHS) and the Do No Harm principles.

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.

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)**.

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.

A postcard sharing inspiring Community Engagement and Accountability experiences with NRC colleagues.

4.2.2 Improvements NRC will make to manage these adverse impacts

NRC has finalised a new Community Engagement and Accountability Policy and Community Feedback Mechanism Handbook. These will be rolled out in the coming year. The new Safeguarding Policy and Minimum requirements is also being rolled out in respect of project participants.

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 government 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.

Better Learning Programme training for local partners in Iran.
Photo Credit: Sina Fakhar/NRC

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 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.

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.

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 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 for partners
- developed safeguarding training for partners
- developed guidelines on how to support local partners improve their safety and security risk management.

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, to train staff in how to capacity build partners in an effective way and to train partners in specific areas, for example safeguarding.

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** 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 entering Gaza in January 2025.
Photo credit: 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 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:

- **Updating 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.

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)