

Report on the Norwegian Transparency Act and Diversity and Inclusion

Nordic International Support (NIS) Foundation

6 February 2025

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Purpose of the Transparency Act (§1)

§1 «The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.»

The Nordic International Support (NIS) Foundation is obligated to comply with the Norwegian Transparency Act (01/07/2022) and will work actively to the best of our ability to fulfil the purpose of the law through control of our activities and implementation, and follow-up and dialogue with our partners, suppliers and stakeholders. For questions about the report or other questions about NIS' work with the Transparency Act, please visit our website (<https://nis-foundation.org/transparency/>) or contact us at post@nis-foundation.org.

1. Introduction

This report accounts for how NIS respond to the Transparency Act requirements, and NIS' efforts relating to work conditions, diversity, inclusion, anti-discrimination and human rights in the year of 2023¹.

NIS has an extensive framework of policies, guidelines, strategies, and procedures in place to meet the requirements of personnel management and secure a safe and health-promoting work environment, diversity and inclusion, to actively counter and address any form of discrimination and harassment within different areas of the organisation, and to ensure our work does no harm to our surroundings, including the environment, the people, and the communities we interact with.

In response to the requirement of the Act, this report also details how NIS works to reduce and manage: 1) Potential negative consequences on internal work conditions, and: 2) Potential negative consequences on basic human rights.

2. Internal framework

The following is an overview of the Foundation's internal framework of policies, procedures and guidelines regarding ethical standards, HR, and work environment:

- | | |
|--|--|
| • Code of Conduct for NIS Personnel and Code of Conduct for NIS Partners | • Anti-Corruption Guidelines |
| • HR Policy | • HSES (Health, Safety, Environment and Security) Policy |
| • PSEA (Prevention of Sexual Exploitation and Abuse) Policy | • Child Safeguarding Policy and Principles |
| • HR Manual/Handbook/SoP (office/programme-specific documents) | • HR and Work Environment Toolkit |
| • HSE Minimum Requirements and Guidelines | • GESI (Gender Equality and Social Inclusion) Policy and Action Plan |
| • Workplace Anti-Discrimination, Harassment and Bullying Policy | • Guidelines for Workplace Conflict Prevention |
| • Professional Development Policy | • Recruitment Guidelines |
| • Incident Management Plan – Safeguarding and Code of Conduct | • Performance Review Guidelines and Checklist |

¹ The content of this report was made available on our website (under the tab "Transparency") in June 2024.

Many of the documents listed above are included in the *NIS Code of Conduct and Organisational Policies* and the *NIS HR and Work Environment Toolkit* folders that are shared with all new NIS personnel in the very beginning of employment, as part of the introduction to the organisation. Personnel are also required to sign that they will adhere to the Code of Conduct and related organisational policies.

For NIS partners, NIS has similarly developed a *Code of Conduct for NIS Partners* folder that is shared with partners, and that they are obligated to sign and adhere to.

2.1 Internal assessment, implementation, and control

The Foundation's process for internal assessments includes:

- 1) Mapping and identification of specific topics related to HR and work conditions, financial management, safety and security, etc. by the use of the internal audit function, and internal or external health checks/due diligence format, work environment survey, or similar
- 2) Assigning responsibility and actions to follow-up on the findings and reduce risk and negative impacts
- 3) Implement actions and regularly evaluate

Below are some examples of this practice:

- NIS keeps organisational and programme/project-specific, contextualised risk registers. These are developed as needed (e.g., for new projects), and regularly updated.
- The NIS HQ Plan of Action (PoA) is annually revised at the HQ strategy seminar, regularly updated by the employees (with assigned responsibility), and quarterly reviewed in all-staff meetings. The PoA contains actions that effectively responds to organisational and programme development needs, as well as policy requirements.
- The NIS HR and Work Environment annual wheel depicts what is a minimum number of HR and HSE activities for management and HR functions to implement, with the support of HSE Contacts where relevant. It also secures discussion cross-roads for colleagues and management to engage in key NIS policies and guidelines linked to our Code of Conduct, HR routines and processes, and the work environment. A report for all such activities shall be developed and consist of (as a minimum): (1) the subject or focus of the activity/training, (2) date and place, (3) participants/staff involved and (4) follow-up plans.

3. Norwegian Transparency Act Report

This section particularly responds to the requirement of the Norwegian Transparency Act, and details how NIS works to reduce and manage:

- 1) Potential negative consequences on internal work conditions, and:
- 2) Potential negative consequences on basic human rights

Working in conflict and post-conflict environments, NIS lays the utmost importance in conducting our work to the highest ethical standards. This includes both a strong focus and continuous effort to ensure our personnel work under the best possible conditions (detailed in section 4 below), and that NIS – including our personnel and our interventions – do no harm to the communities, people, and environment we come in contact with. In this, NIS respects and continuously work to ensure we meet the sector-specific concepts of Do No Harm and conflict sensitivity (see textboxes 1 and 2 below).

3.1 Risk Assessment and Management Matrix

The Foundation and the separate programmes assess and manage risks relating to the organisation, programmes, and interventions systematically. The NIS risk management concept identifies and manages risks through a three-tiered model, defined as follows:

- a) **Business risks:** Business risks are risks that may prohibit NIS from obtaining its strategic objectives. These are high level risks that should inform management in all decision making and initiatives. Business risks may require long-term mitigation efforts and should have the same time perspective as the strategic plan.
- b) **Operational risks:** Operational risks are risks that follow from the operations of the organisation and need to be managed regularly to ensure that NIS operates within acceptable risk levels. Such risks are managed by regular risk assessments and by appropriate policies, systems, standards, templates, and culture.
- c) **Contextual risks:** Contextual risks occur at project level and relate to the context, objectives, partners, people and donors involved in a specific project. These risks and their associated risk level will be different from project/programme to project/programme and should be managed within each project/programme.

The planning and implementation of all new activities involve thorough risk reviews and the development of context-specific risk matrix' that is consulted and updated on a regular basis.

The below is an example of how NIS categorise, assess, and manage identified risks – organisational or programme-specific. The table includes examples of risks that specifically relate to the Transparency Act reporting, i.e. on potential negative consequences on work conditions and human rights.

#	Transparency Act Category	Risk Example ²	Consequence	Risk Rating	Mitigation measures	Consequence (treated) ³	Risk Rating (treated)
1	Potential negative consequences on internal work conditions	Health and medical NIS is operating in locations where health infrastructure and support is underdeveloped, which can result in illness or loss of life (expats likely most at risk). There is also a business continuity implication, potentially worsening the work conditions for remaining personnel.	Moderate	High	Deter: Programmes identify preferred health facilities, establish health advisory services, vaccinations, pre-assignment health checks Detect: Monitor alerts and advisories, HSE contact, supervision Respond: Insurance, evacuation coverage; individual adjustments	Moderate	Medium
2	Potential negative consequences on basic human rights	Child safeguarding Child exploitation and abuse/harassment/sexual exploitation committed by NIS or partner/contractor staff	High	High	Deter: Reference check and other procedures in the recruitment process, signature of CoC and safeguarding policies, awareness raising Detect: Whistleblowing process, Safeguarding focal points, supervision Respond: Investigations, disciplinary measures, refer to justice system, review policies and procedures	Moderate	Low

² Note that this is a non-exhaustive risk overview.

³ The NIS Organisational Risk Register includes full detail and analysis of both untreated and treated risks.

3.2 Efforts to Reduce and Manage Potential Negative Consequences on Work Conditions

In addition to the details in section 4, the below are some examples of NIS' actions and policies that aim at reducing and managing potential negative consequences on work conditions:

- Employee contracts and country/programme-specific HR Manual/Handbook/SoP ensure all aspects of employment is regulated, such as work time, leave and holiday, insurance, contracting and termination, etc.
- HSE Contact and Safeguarding Focal Point responsibilities at each NIS office support staff and management in implementing and overseeing the work environment and safeguarding regulations and manage concerns or reports.
- Whistleblowing and report mechanisms are clearly communicated to personnel, through verbal and written communication. There are several channels for reporting a concern available. Concerns are managed according to a set of incident management principles, including regulations such as report template, response time, confidentiality, escalations, etc.
- Office safety and security management plans are in place and regularly updated. The programmes use vetted and trusted security contractors, with in-depth knowledge about the local context.
- Security awareness and risk management tools and training are in place.
- Procedures are in place for crisis/emergency management and business continuity.

In 2023, NIS conducted internal refresher trainings for several country programme staff in the following selected topics:

- Safeguarding and PSEA
- Anti-Corruption

In addition to awareness-raising and reminders of internal guidelines and policies on the selected thematic areas, these refresher trainings included assessment of gaps and challenges, group work aiming to develop mitigation for these gaps and challenges, and follow-up plans. Both anti-corruption and safeguarding are areas NIS Foundation continuously focus on both internally and in partner contact, and will be followed up in 2024. For more, see sections 3.4 and 4.5.

3.3 Efforts to Reduce and Manage Potential Negative Consequences on Basic Human Rights

NIS directly and indirectly promotes the observation of human rights in the management and implementation of our activities (see also 3.5 below).

NIS' work is conducted through a lens of Do No Harm, and our participatory approach supports the Do No Harm principles in that it enables and ensure the programmes and projects engage with the community in project planning, implementation, and maintenance. In this way the activities actively respond to the needs in the community while also including the target groups in a safe, productive, and empowering way, and avoid causing harm. Moreover, NIS focus on keeping trusted relationships with relevant local actors and donors – a necessary condition for mitigating any harm to the society.

DO NO HARM

The principle or approach of Do No Harm helps NIS to identify unintended (negative) impacts of interventions in settings where there is conflict or risk of conflict. To NIS this means that we always assess whether our presence, personnel, or interventions may cause harm on our surroundings, and make necessary adjustments or refrain from interventions to avoid such harm.

Some examples of how NIS work to reduce and manage potential negative consequences on human rights, include:

- Selected projects include specific focus at male and female youth, IDPs and other marginalised groups and engage them in a manner that ensure their inclusion and benefits the wider local society. In selected projects, NIS include educational and work training programs that provides young women and men of various backgrounds the skills to become competitive in a restricted job market or aim to create an avenue for boys and girls and both male and female youths to set aside their differences and join in a shared activity.
- In Somalia specifically, tribal affiliations and seniority greatly contribute to career opportunities and access to life saving services, such as potable water and health care facilities. NIS actively works to create opportunities to level the playing field for those who are normally left with very few options.
- The right not to be discriminated against is addressed particularly in the NIS Gender Equality and Social Inclusion (GESI) policy and action plan. NIS' work and strategy at large gives special consideration to GESI as a cross-cutting theme where youth and other marginalised groups' participation will be enhanced. This includes specific activities that promote women's participation, socio-economic empowerment and skills training to improve their livelihoods. Moreover, in our Somalia projects GESI considerations are embraced in construction of government and communal buildings to ensure the facilities are gender-responsive and particularly consider the different needs of women, girls, PWD, and other marginalised groups (see section 4.6 below).
- NIS has a strong awareness of and ensure our interventions do no harm to the environment. Several NIS programmes also specifically include interventions promoting renewable energy to foster environmental resilience. One example is implementing quality rainwater harvesting (communal water-catchments) infrastructures to increase access to water and enhance community's adaptation to recurring droughts born out of climate change.

3.4 Engaging with partners and contractors

NIS engages with implementing partners, contractors, and suppliers where relevant in the programme/project implementation. These engagements take many forms, ranging from fund manager, and the partner organisation implementing the project in its entirety, to NIS sourcing the services of a supplier for a particular installation or delivery in a project. Ensuring they follow NIS standards and donor requirements, NIS has put in place extensive routines and guidelines for partners, from procurement through implementation to project completion.

Concrete examples of efforts to assess and to support partners to reduce and/or manage potential negative impacts on work conditions, include⁴:

- Suppliers must complete the NIS Supplier Ethical Standard and Exclusion Form, with a number of concrete requests and requirements related to respect and apply basic human rights, non-exploitation efforts, etc.
- As a funding entity, NIS requests of the implementing partners that the contracts for employees, consultants and volunteers shall be aligned with the International Labour Organisation Decent

⁴ The chosen measures for each particular partner/contractor/supplier are context specific and will therefore vary.

Work Labour standard, as well as local legislation, and that they guarantee proper duty of care, including safety, security and well-being.

- Conducting due diligence process, including risk assessment, of potential implementing partner organisation.

CONFLICT SENSITIVITY

Conflict Sensitivity is about understanding the interlinkage between NIS' activities and the conflict context. This awareness and consideration enable NIS to ensure our interventions do not exacerbate conflict but support peaceful coexistence and inclusion.

- Partner organisations must follow the Code of Conduct and safeguarding policies, and develop their own PSEA/safeguarding framework and whistleblowing channel, also available to the community/beneficiaries they come in contact with.

- NIS' implementing partners are requested to strictly abide to Do No Harm and conflict sensitivity principles. The activities implemented, as well as any form of programmatic communication, shall in no way contribute to the escalation of violence.

For all the above requirements, NIS project and organisational development staff support in the development and implementation. NIS project and MEL staff monitor the implementation of the project and organisational development activities by the support of monitoring check lists, carefully designed to capture and evaluate aspects also relating to work conditions and human rights.

3.5 NIS and the SDG's

Related to our efforts to reduce potential negative impacts on basic human rights, NIS also works to support improved security, environmental health, and stability through the realisation of the principles underpinning the UN Sustainable Development Goals (SDGs). NIS primarily works with institutional development, social measures, education, utilisation of green technologies, grants management and awareness raising efforts, focusing on supporting the creation of peaceful and inclusive societies, environmental awareness, social equality and sustainability. For the Foundation, the exact nature of a project is secondary to its ability to contribute to the realization of the principles upon which the SDGs are based.

Of the 17 SDG's, NIS' work primarily supports the following (including concrete examples from NIS' interventions):



- NIS programmes provide short-term employment opportunities in an effort to combat poverty in Somalia by providing an immediate relief to household needs.
- Through one project module, NIS also provided education and training in technical skills to young students as a means to provide skills that will enable the communities to move out of poverty in a sustained manner. And in this way, also ensuring inclusive and quality education for all (SDG 4).



- NIS contributes to the right of communities in Somalia to have access to food by rehabilitating and constructing markets in the communities. NIS also rehabilitates and secures roads that function as the arteries for those markets, ensuring and facilitating the transit of goods to their final destination.



- Programmes engage in mental health support to conflict-affected stakeholders including youth and IDPs.
- NIS' programmes contribute to the right to a healthy life within conflict-affected communities by providing adequate and very needed solar-based electrical systems that ensured that a wider range of health services can be provided at hospitals, as well as to extend the hours at which patients could receive the care needed.
- Programmes provide mental wellbeing sessions to staff, as well as to partners and promote an atmosphere of collective care for overall health.



- Vocational training is increasingly a part of NIS' programmes in Somalia. Over the past six years, NIS has engaged in 8 TVET/vocational training interventions, reaching close to 180 direct beneficiaries. These programmes targeted basic construction skills, with an emphasis on solar technologies.



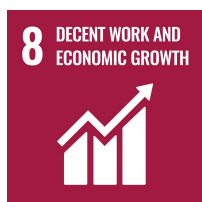
- NIS funds and collaborates with community based and civil society organisations that work with increasing the rights and participation of minority groups, gender equality and accountability.
- One NIS programme directly sought to contribute to this in the Somali communities by providing microfinancing and installing solar-based energy systems to women-led SMEs in need. By doing this, the programme ensured women economic empowerment locally and that other women had access to more job opportunities.
- One NIS programme works exclusively with women and LGBTQIA+ organisations in order to support targeted issues of women, girls and LGBTQIA+ individuals.
- Another NIS programme has targeted standards set to ensure that partner projects are gender mainstreamed at a minimum, with a goal of many being gender transformative. No gender-blind projects are accepted.



- As part of its Green Module interventions, one NIS programme (ISTAND) guaranteed the right to access to water of Somali communities that did not count with a source of water that met their basic daily needs through the construction/ rehabilitation of water wells/ catchments and the installation of solar systems to water wells that made extraction more efficient.



- Overall, several of NIS' interventions seek to address the causes and effects of climate change and environmental adverse events. The promotion and installation of renewable energy technologies across our programmes demonstrate the use and benefits of alternative energy solutions in the communities that enhances environmental sustainability.
- As an example, some of the solar systems installed by NIS in hospitals have helped health services improve their quality, SMEs to expand their businesses and save money which translated into new business investments, solar streetlights that make public lightning available to communities where life stopped after dark, amongst others.



- NIS works to improve the economic dynamics of the locations it intervenes by introducing infrastructure that would support the local business environment; by providing skills training and education to young people as a means to ensure they had the capability to secure employment; and by providing short-term employment to laborers who then manage to secure a wage to sustain the most immediate needs of their households.

9 INDUSTRY, INNOVATION
AND INFRASTRUCTURE



- NIS is dedicated to the delivery of resilient, long-lasting infrastructure that would ensure the right to access basic services of communities in Somalia. At the design and procurement stages, NIS makes sure to conduct the required assessments to determine the best materials and sources so that the infrastructure would be able to withstand the environmental conditions and securing the delivery of the services in a sustained manner.

10 REDUCED
INEQUALITIES



- NIS funds CSOs who support those affected by inequalities and violence, calling for increased rights and accountability and justice regardless of gender, ethnic, religious and generational identities, LGBTQIA+ affiliation or disabilities.
- In Somalia, NIS seek to empower and promote the social, economic and political inclusion of youth, women and diverse clans by, first, conducting inclusive engagement sessions where projects are discussed, second, by providing employment opportunities to youth, third, by facilitating loans to women-owned businesses and fourth, by constructing infrastructure that in design would allow for the access and use of communities regardless of gender, age and clan affiliation.

11 SUSTAINABLE CITIES
AND COMMUNITIES



- In Somalia NIS has implemented a range of projects contributing to the sustainability of cities and communities. Flood defense projects in Beledweyne, Mogadishu, Bardheere and elsewhere have helped to mitigate the negative impacts of regular flooding: NIS has constructed and/or rehabilitated over 18km flood defence infrastructure all over Somalia.
- A project hybridising an existing diesel-powered electricity grid with solar-PV capacity in Luuq helped to reduce the emissions of the city's electricity supply.
- Additional projects targeting waste management and community clean-ups are also helping to make cities safer and healthier for their residents.

12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION



- With most of its infrastructure interventions, NIS also contributes to the promotion of sustainable consumption and production patterns, seeking to support the rights of people to have access to basic, sustainable services that also encourage economic development to combat poverty and diminish the impact of future possible economic and climate change-derived factors.
- In one programme country specifically, NIS works with grassroots organisations which provide access to basic, necessary, and sustainable services to their local communities.

13 CLIMATE
ACTION



- In Somalia, NIS has implemented a number of projects aimed at mitigating the effects of flooding, which have been made worse and more frequent by climate change. By refurbishing and building flood control infrastructure such as canals, levees and culverts, local communities are better equipped to handle climate change-related challenges.
- Through NIS' extensive work installing solar-PV capacity for public lighting, hospitals, schools and government buildings, diesel consumption for these services has been greatly reduced, lowering overall carbon emissions.
- NIS' work building water catchment infrastructure in Somalia is helping local communities to better manage water in between the rainy seasons, supporting communities and livelihoods during their most vulnerable periods: NIS has installed 22 solar-powered pumps for wells in Somalia for both public consumption and irrigation purposes.
- In Mali, NIS is installing nano-grids for poorer households, as well as solar-powered irrigation technology, helping to reduce fuel usage in target areas.



- NIS has been involved in projects geared directly towards promoting social inclusion, supporting organisations that target daily issues of justice in the community, including GBV, sex workers rights and protections, LGBTQIA+ rights and protections, IDPs, and women and girls' say over their own life and role in their communities.
- Over several years, we have found that solar streetlights in Somali promote women's safety at night.

4. Diversity, inclusion and anti-discrimination

The Foundation aims to be an inclusive workplace with a diverse workforce and equality between women and men, in line with our adopted policies, strategies, and plans of action (listed above). This includes both internally related to organisational culture, and externally, through our programming (integration, knowledge management, monitoring and evaluation, finances, and programmatic approach). We work actively and methodically to promote the objectives of anti-discrimination in our activities. This includes within recruitment, compensation and benefits, working conditions, promotions and opportunities for skill enhancement, and in the work environment in general.

4.1 Staff composition and recruitment

By the end of 2023, the gender balance overall in the organisation among all 121 NIS Foundation employees and secondees was almost even, with 51% women and 49% men. At country office/programme level, NIS continuously works to ensure a gender balance, responding to a mix of sectoral and cultural challenges. NIS has been working along programme-specific strategies to counter this and seek a gender balance. As an example, the Somalia programme office has been working strategically to recruit and promote more women to managerial positions.

The Foundations employees and secondees were from 23 to 71 years, representing a wide age group. Split by age group, the NIS population in 2023 was distributed as follows: 20-29 years 10%; 30-39 years, 50%; 40-49 years, 20%; 50-59 years, 17%; 60-69 years, 2%; and 70-79 years, 1%.

NIS' Recruitment Guidelines provides HR staff, management, and the recruitment team with practical guidance to the recruitment process. This includes considering diversity and gender balance at several stages of the process, including as part of the role analysis, advertisement, interviews, and selection process. The Foundation will provide job opportunities to the most qualified person regardless of their gender, gender identity and expression, sexual orientation, disability, age, ethnicity, religion, etc. Nevertheless, some socio-demographic variables may be given priority in some recruitments in order to obtain a balance, e.g. gender balance, and an international/national staff ratio and representation of different ethnicities.

The Foundation's aim for a diverse workforce at both HQ and Programme Offices is also a strategic choice as diversity within the workforce equips NIS with the best possible opportunities to deliver successful projects across different geographical and thematic implementation areas.

Below are some examples illustrating how the Foundation ensures a focus on diversity in the recruitment process:

- Specifically welcome all candidates to apply, regardless of nationality, gender, disability, etc.;

- Establish a recruitment team with representatives from the relevant department, HR or HSE contact, and management to ensure varied points of view;
- Develop question guides and score cards to ensure a competency-based recruitment and to the best of our ability secure an unbiased recruitment and selection process.

NIS conducted two recruitment processes at the HQ level in 2023 for two roles in the finance team. Globally, several recruitment processes have taken place.

4.2 Salary and work conditions

NIS aims to have equal salary for equal jobs for women and men in the organisation. According to the NIS salary model, new employees are placed in a position category and salary step based on their education level and years of previous relevant experience, as well as level of complexity and responsibility in the position, regardless of the new employee's gender, identity, religion, ethnicity, function level, etc.

NIS has in 2023 continued reviewing the organisational salary model. The established working group (consisting of representatives from Senior Management, Finance and HR) will be collecting information about and analyse the salary of all NIS Foundation employees, across parameters such as seniority, level of responsibility, position %, gender, etc. The objective of the review will be to harmonise the NIS salary model, establish organisational salary principles, eliminate unwanted and unfair differences in salary level on the basis of e.g., gender and age, clarify the salary categories and requirements, ease the task of setting right salary for new employees and in promotions, and ensure NIS stays relevant and competitive in the sector.

For 2023, NIS is also reporting on the wage increase of the employees (excluding consultants and secondees) disaggregated by gender:

No. of staff	Gender	Average % increase
42	F	8%
44	M	5%

4.3 Promotion and development opportunities

Promotions, salary increase, and professional development opportunities are carefully evaluated by the line manager as part of the annual performance appraisal. Any individual salary increases, or promotion shall be linked to performance, increase in complexity or responsibility of role, within the salary band of the role, and documented by the line manager. The NIS Professional Development Policy guides management, HR and the individual employee in possibilities and requirements for professional development.

4.4 Work-life balance and individual considerations

In line with the NIS HR and HSE policies and procedures, NIS is promoting a balance between professional and private life for all its staff. Having a diverse workforce also means the employees have different needs and limitations that should be taken into consideration. NIS provides for and encourages staff to take advantage of a number of benefits designed to promote physical and mental wellbeing, including a healthy lifestyle and balance between professional and personal life. This is especially

important in a setting where more staff are working from home and could more easily blend the two environments in a way that is detrimental to their health. As far as possible, while also considering the needs of the team and the organisation as a whole, individual staff members' need for specific considerations are taken into account.

To support the work-life balance, several arrangements have been established, including:

- Home office days (e.g. 2 / 3 solution)
- Flexible worktime/core hours (10-14)
- Religious holidays
- Menstrual day

The above arrangements are based on a high level of trust and presupposes that the employees understand their responsibility in meeting requirements and delivering within their role, including their commitment to uphold the team feeling and good work environment.

Some of the internal structures that guard and enable this is the annual safety inspection (*vernerunde*) and the performance appraisals. Individual adjustments are documented by the HSE contact in the Safety Inspection Action Plan, or in the Performance Appraisal Action Plan and evaluated by the supervisor on a regular basis.

4.5 Safeguarding/PSEA

In 2021, NIS developed and rolled out a new, comprehensive PSEA policy to all staff globally. NIS' PSEA Policy applies to all staff, including sub-contractors/consultants and implementing partners, and documents how sexual exploitation and abuse (SEA) incidents must be prevented, managed, reported, and investigated, including engagement of and reporting to NIS Senior Partners or the Board. The roll-out also included general safeguarding training of all staff and more in-depth training of key personnel (managers, Safeguarding Focal Points, and project staff) by external safeguarding consultants.

The Foundation has in place a range of procedures, tools, templates, and monitoring and support mechanisms to ensure that both employees and implementing partners meet Safeguarding/PSEA minimum standards. This includes:

- Robust screening processes and employment practices in place for all roles, including reference checks and behavioural-based interview questions related to Safeguarding/PSEA.
- All employees and external sub-contractors/consultants are required to study, sign, and agree to adhere to the organisation's PSEA Policy, Workplace Anti-Discrimination, Harassment and Bullying Policy, Code of Conduct and whistleblowing procedures detailing reporting channels, forms, and response procedures prior to commencing work with NIS.
- Employment contracts contain provision for suspension of any staff member who is under investigation and provisions to dismiss any employee following an investigation.
- Mechanisms for ensuring staff awareness ability to raise concerns about SEA or unacceptable behaviour include: PSEA orientation on commencement of employment; standing agenda item on risk management; annual PSEA refresher training; and programme office and HQ Safeguarding Focal Point(s). Safeguarding Refresher Trainings were conducted with staff in 2023.

- Safeguarding plans, reviewed and updated on an annual basis. The plan outlines how the Foundation/programme will work to implement and monitor PSEA minimum standards, both internally and in relation to partners.
- As noted, the Foundation has several Safeguarding Focal Points which are selected every two years. NIS has developed a ToR for this role, which clearly sets out the focal point's responsibilities.

4.6 Gender Equality and Social Inclusion Focus Area

NIS has dedicated staff at both HQ and programme office level with specific responsibility for the focus area Gender Equality and Social Inclusion (GESI). Together with programme staff, the HQ GESI advisor finalised a NIS Somalia GESI Strategy in 2021, which further led into an organisational GESI Policy. This policy is designed to support equity progression for all groups, including women, youth, LGBTQI+, persons with disability, ethnic minorities, and other traditionally marginalized groups. Accompanying the GESI Policy, the Foundation established a GESI Action Plan and Gender Marker document in 2022.

In 2023, NIS continued to implement several GESI-related activities across its programmes.

4.7 Annual staff survey

In 2021 NIS was certified a great place to work. Great Place to Work® Institute Norway documented this through a comprehensive survey of NIS employees' experience of trust, pride and camaraderie at the workplace. In 2023, after having conducted three Great Place to Work surveys, NIS continued exploring other staff survey providers. Although Great Place to Work has always provided the Foundation and its management with a comprehensive overview of the work environment and the levels of trust, pride and camaraderie, NIS is looking for a different type of methodology and presentation of results that are more straight forward and integrate better with our HR and personnel management cycle.

In 2023 NIS decided to develop an internal staff survey that in a more tailored manner provides NIS with a way of systematically measuring elements of the work environment within the organisation as a whole in addition to the other, continuous measures mentioned above. Elements measured in the work environment include (to mention some): presence of discrimination and harassment, and fair treatment regardless of gender, sexual orientation or religious beliefs. It also segregates answers on the basis of age and gender, which allows the organisation to see whether there are trends that should be addressed. The new staff survey will be implemented in 2024.

4.8 Key numbers

The table below summarises key numbers for diversity and inclusion in the reporting year of 2023:

Category*	Oslo (HQ)	Programme Offices
Gender balance	12 (9 women + 3 men) (The Board: 2 women + 3 men)	109 (49% women and 51% men)
Temporary employees (women and men)	1 woman (project-based role)	All employees in Programme Offices are temporarily employed given all positions are project -based and dependent upon

		donor funding. A few exceptions where national legislation dictates otherwise
Part-time employees (women and men)	3 women, 0 men	0
Number of employees working unvoluntary part time	None	Some staff in Asia (due to budgetary constraints)

Eric E. A. Sevrin
Chair of the board

Lill-Hilde Kaldager
Board member

Kassim Gabowduale Gabowduale
Board member

Vilde Straume Wiig
Board member

Christian Martinsen
Board member

Christopher Sean Eads
Executive Director

Electronic signature

Signed by

Eads, Christopher Sean

(Identity verified with BankID (NO))



Date and time (UTC+01:00) Central European Time (Berlin) (DD.MM.YYYY HH:MM:SS)

07.02.2025 10:33:24

Date of birth

1973-03-10

Signature method

BankID (NO)

Signed by

Kaldager, Lill Hilde

(Identity verified with BankID (NO))



Date and time (UTC+01:00) Central European Time (Berlin) (DD.MM.YYYY HH:MM:SS)

07.02.2025 10:36:15

Date of birth

1968-03-10

Signature method

BankID (NO)

Signed by

Martinsen, Christian

(Identity verified with BankID (NO))



Date and time (UTC+01:00) Central European Time (Berlin) (DD.MM.YYYY HH:MM:SS)

07.02.2025 11:47:45

Date of birth

1968-10-19

Signature method

BankID (NO)

Signed by

Gabowduale, Kassim G

(Identity verified with BankID (NO))



Date and time (UTC+01:00) Central European Time (Berlin) (DD.MM.YYYY HH:MM:SS)

07.02.2025 10:55:32

Date of birth

1971-09-18

Signature method

BankID (NO)

Signed by

Wiig, Vilde Straume

(Identity verified with BankID (NO))



Date and time (UTC+01:00) Central European Time (Berlin) (DD.MM.YYYY HH:MM:SS)

07.02.2025 10:32:14

Date of birth

1985-10-20

Signature method

BankID (NO)

Signed by

Sevrin, Eric Emmanuel A

(Identity verified with BankID (NO))



Date and time (UTC+01:00) Central European Time (Berlin) (DD.MM.YYYY HH:MM:SS)

07.02.2025 10:34:57

Date of birth

1972-05-03

Signature method

BankID (NO)

