




Safeguarding Policy



DOCUMENT CONTROL SHEET

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1. Scope

This policy applies to all employees in the UK and internationally, subcontractors, external consultants, and anyone working on behalf of Coffey International Development Limited.

2. Purpose

Coffey International Development Limited is committed to providing a safe and trusted environment which safeguards anyone who our organisation has contact with, including beneficiaries, staff, subcontractors and consultants. Our organisational culture is one that prioritises safeguarding, and ensures anyone who is a victim of an incident or reports an incident are safe and supported. This assurance is reflected in other organisational policies, including Code of Conduct, Whistleblowing policy, Modern Slavery Act Statement, Equal Opportunities, Recruitment, Health and Safety and Gender policies. The goal of this policy is that all staff have absolute clarity on Coffey's zero-tolerance approach to abuse and exploitation, and that they understand how incidents and allegations will be handled should they arise, including reporting to the relevant authorities and clients. Annex 1 details a non-exhaustive list of unacceptable behaviours.

3. References

Coffey has numerous policies, procedures and measures in place to protect people. The safeguarding policy should be read in conjunction with other policies including:

- Whistleblowing Policy
- Tetra Tech Code of Conduct
- Modern Slavery Act Statement
- Equal Employment Opportunities, Anti-Discrimination and Harassment Free Workplace Policy
- Gender Policy
- Recruitment Policy
- Health and Safety Policy
- Conflict of Interest, Bribery and Corruption Policy

4. Definitions

Child – Anyone under the age of 18

Vulnerable adults - Someone who is or may be for any reason unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Child safeguarding - Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. It means:

- Protecting children from abuse and maltreatment
- preventing harm to children's health or development
- Ensuring children grow up with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes.

Child safety ¹- Is the safety of children from violence, exploitation, abuse and neglect.

Safeguarding Officer – Is a point of contact for anyone wanted to raise a concern or complaint including staff, beneficiaries, subcontractors and consultants. Safeguarding Officer(s) will have up-to-date knowledge of child safeguarding and protection of vulnerable adults.

Sexual exploitation - Any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including, but not limited to, profiting financially, socially or politically from the exploitation of another person.

¹ Article 19, UN Convention on the Rights of the Child p8

Sexual Exploitation of a child – The sexual exploitation of a child who is under the age of consent, is child sexual abuse and a criminal offence. An underage child cannot legally give informed consent to sexual activity. Coffey considers that:

- a. Sexual activity with a child without their consent is child abuse and a crime eg. Rape, indecent assault;
- b. Any sexual activity with a child who is under the legal age of consent of the country in which they live or in which the offence occurs regardless of whether they consent is child abuse and a crime.
- c. Consensual sexual activity with a child over the legal age of consent of the country in which they live and /or in which the offence occurs, but below 18 years (although not a crime) will be dealt with as a breach of this safeguarding policy and the Code of Conduct.

Sexual Misconduct - Sexual misconduct is a broad term encompassing any unwelcome behaviour of a sexual nature that is committed without consent or by force, intimidation, coercion, manipulation, or abuse of power.

Abuse of child or vulnerable adults - Abuse consists of anything which individuals, institutions or processes do or fail to do which directly or indirectly harms vulnerable adults or children or damages their prospect of safe and healthy development. The main categories of abuse are defined by WHO as Physical Abuse, Emotional Abuse, Neglect and Negligent Treatment, Sexual Abuse, and Exploitation, Physical Abuse involves the use of violent physical force so as to cause actual or likely physical injury or suffering, (e.g. hitting, shaking, burning, female genital mutilation, torture.)

5. We are committed to keeping vulnerable adults, children, project beneficiaries and communities we work with safe

Staff training and awareness

- All employees in the UK and internationally, subcontractors and external consultants and anyone working on behalf of Coffey International Development Limited are obliged to abide by the Safeguarding policy.
- All employees in the UK and internationally, subcontractors and external consultants will be inducted on the Safeguarding Policy and accompanying procedures when they join the company. Staff responsibilities and programme-specific risks and mitigations will be further reinforced in the project kick-off.
- Information about the Safeguarding Policy and relevant referral and reporting mechanisms will be displayed in Coffey corporate and programme offices.
- All safeguarding officers will receive relevant child safeguarding and protection of vulnerable adults training.

Tailored risk management

- We will include 'Safeguarding' as a risk in all project risk assessments to make sure that all projects identify relevant risks and mitigation plan
- All Project Managers will be accountable for ensuring that appropriate safeguarding procedures have been put in place. Project Managers may choose to delegate this responsibility to someone in the project delivery team, provided this person has received safeguarding training.

Rigorous staff checks

- We will conduct in-depth reference checks for all staff and subcontractors.
- We will conduct in-depth international criminal records checks for all staff who will be working with children or vulnerable people.
- We will include a specific question on safeguarding in staff interviews to demonstrate to candidates that Coffey has a zero-tolerance approach to abuse and exploitation.
- When requesting references, we will specifically ask the referees to raise any concerns regarding the individuals' conduct and ability to uphold safeguarding principles.

Safeguarding protocols when conducting research

When conducting research, Coffey follows best practice ethical standards to protect the rights and ensure the safety of all respondents, particularly vulnerable groups. Ethical processes and procedures are reviewed and tailored to the needs of the specific context, research area, and type of respondents.

These protocols are designed to preserve the dignity and ensure the protection of the study's participants. While guidance can never provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight behaviour that is inappropriate or inadvisable. In recognition of the considerable variation in local practice regarding the role and status of girls and circumstances surrounding their normal relationships with adults and avenues for viable professional support, it is understood that local survey organisations may necessarily adapt standards and criteria to fit local need. While providing a comprehensive framework, the intention is that those with responsibility should adapt the ethical guidance to their own context and circumstances with the agreement of Coffey. However, the principles that underpin Coffey's ethical protocols should be readily endorsed by all wherever they work. Above all we encourage partners to undertake both effective training and proper advance consideration of responsible actions to minimise the possibility of harm through omission or commission.

- All employees in the UK and internationally, subcontractors and external consultants and anyone working on behalf of Coffey International Development Limited will obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided to those providing consent. It is staff's responsibility to ensure photographs, films, videos, DVDs or any other images present children in a dignified and respectful manner and not in a vulnerable or submissive manner. They also need to ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

6. Reporting and Handling incidents and allegations

Coffey has clear process in terms of handling incidents and allegations should they arise, including reporting to the relevant authorities, and to funding partners. All allegations of abuse or exploitation will be taken seriously and handled with sensitivity and care. Please find a summary of the how incidents and allegations are handled in Coffey below. This process is also captured in a flow chart in Annex 2.

Keeping children and vulnerable adults safe at all times

1. **Initial Reporting:** All allegations or concerns of abuse or breach of our Safeguarding Policy should be reported to a Safeguarding Officer (in-country or the UK). The first priority of the Safeguarding Officer is to ensure that the child or vulnerable adult concerned is at no risk of further harm.
2. **Reporting to UK HR and Senior Management:** The Safeguarding Officer will report to the Coffey UK HR Manager (or HR representative in-country who will inform the UK HR Manager). Senior Management in the UK will also be informed of the allegations.

An assessment will be made of whether a breach of national or international legislation has taken place. Where there is a suspected breach of law, Coffey will report the case to the relevant authorities and collaborate with their investigation.

3. **Child and Vulnerable Adult (CVA) Safeguarding Committee to convene:** The UK HR Manager will arrange for the Child and Vulnerable Adult (CVA) Safeguarding Committee to meet (consisting of the Head of Risk and Compliance, HR Manager, Practice Lead, COO). This committee will meet for all safeguarding allegations made and assign a lead investigator and other personnel to assist with the investigation (depending on the complexity of the case).
4. **Investigating the allegations:** The assigned investigator will review the available evidence and conduct interviews with:

- a. Individual(s) making the allegations,
- b. Individual(s) deemed relevant to the investigation, and
- c. Individual(s) alleged to have committed the abuse or breaching the safeguarding policy.

The timeline of the investigation will vary depending on the complexity of the case. However, the investigation will commence no later than one week after the allegation has been received. Based on the evidence collected the investigation team will determine whether to uphold (or partially uphold) the allegations or not.

The alleged individual(s) are likely to be suspended or put on alternative duties during the investigation.

- 5. Disciplinary Procedures:** In the event the allegations are upheld the case will be referred to Coffey UK HR who will follow HR procedures pertaining to misconduct.

All documentation relating to the case will be stored securely. All disciplinary proceedings will be recorded on the employee's record and stored securely. All documentation relating to the investigation will be filed and stored securely.

In the event that the allegations are NOT upheld, the case will be closed and documentation stored secured. Nothing will be recorded on an employment record and the alleged individual(s) will have the right to raise a grievance with Coffey HR.

- 6. Right to Appeal:** The alleged individual(s) has the right to appeal the outcome of the investigation and any disciplinary procedures proposed. The appeal will be requested in writing. The appeal will be reviewed by a someone independent of the investigation (for example, a senior manager in another part of the Tetra Tech company).

Additional information

a. In the event that our Safeguarding Officer is made aware of allegations of abuse that do not concern our staff, consultants, volunteers or sub-contractors, they have a duty to report it to relevant agencies or authorities. All staff members have a duty to report safeguarding concerns to the Safeguarding Officer.

b. In the event that a staff member is concerned that the allegation is not being dealt with appropriately, or if there is a suspicion of a Conflict of Interest, the staff member should use the Whistleblowing Policy to escalate their concerns.

Whistleblowing Policy and Hotline

Coffey has a whistleblowing policy that encourages staff to speak out where they have a concern about an unethical, illegal or irresponsible activity. While staff are encouraged to speak to their line managers or HR, in the event they do not feel comfortable doing so or they wish to remain anonymous there is also an independent whistleblowing hotline (0808 2439250). Staff are reminded of the company whistleblowing policy on a regular basis at meetings and via email. There are whistleblowing "Speak Up" posters in Coffey offices.

"If you ever have a concern about an unethical, illegal or irresponsible activity don't keep it to yourself. Discuss it with your manager or supervisor. If you would prefer to remain anonymous please contact Navex Global. 0808 2439250 24 hours a day, 7 days a week"

"Navex Global is an independent reporting service. When you contact them you do not need to give your name. A professional interview specialist will document your concern and relay the information to the organisation for follow up".

Source: Text from a Coffey Whistleblowing "Speak Up" poster.

All complaints and allegations that come through the whistleblowing hotline are relayed to the Tetra Tech President of International Development Services and the Coffey UK Managing Director. Any complaint or allegation is immediately referred to Coffey UK HR and a meeting of the Child and Vulnerable Adult (CVA) Safeguarding Committee will be convened.

Whistleblowing Advice and Guidance Service

Where staff have doubts or concerns about making an allegation or complaint Coffey refers them to Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline offering advice and support. Their contact details are Helpline: +44 (0) 207 404 6609, E-mail: whistle@pcaw.co.uk

Safeguarding officers

Coffey is in the process of putting in place a network of Safeguarding Officers particularly where we have a significant in-country presence. A Safeguarding Officer will be another point of contact for anyone wanting to raise a concern or a complaint including staff, beneficiaries, subcontractors and consultants. Safeguarding Officers will have up-to-date knowledge of child safeguarding and protection of vulnerable adults, giving them the tools they need to deal with any allegations of abuse, including but not limited to, sexual exploitation and sexual misconduct. As soon as an incident is reported, the Safeguarding Officer will refer the allegation to the in-country HR representative or Coffey UK HR who will convene a meeting of the Child and Vulnerable Adult (CVA) Safeguarding Committee immediately.

7. Disciplinary Procedure

In a case where it is proven that abuse or exploitation by an employee, subcontractor, external consultant or anyone working on behalf of Coffey International Development Limited has taken place, their employment or consultant agreement will be terminated with immediate effect.

Procedural rules

The laws, regulations and best practice standards regarding the applicable disciplinary process differ from one country to the other. Therefore, any person dealing with a disciplinary matter must obtain advice from the local HR representative on the applicable procedural rules. The UK HR Manager must also be involved so that a joint plan is agreed. Where applicable, throughout a disciplinary process, the principle of procedural fairness must be followed. Procedural fairness generally requires, among other things, that:

- the person concerned be made aware of each allegation that is the subject of the investigation
- an investigation take place before any disciplinary action be taken against an employee, subcontractors, external consultants and anyone working on behalf of Coffey International Development Limited
- the relevant person is given an opportunity to put their case forward before a decision is made; and
- the employee be allowed to have a support person present at any interviews and/or hearings they attend. For a subcontractor, external consultant or anyone working on behalf of Coffey International Development Limited they will also have this option.

The laws and practices of each country shall prevail over these and/or any other guidelines set out in this policy.

Temporary suspension or transfer during investigation

An employee may be transferred to alternative duties or suspended temporarily from duty, with or without pay, pending the outcome of an investigation or disciplinary proceedings. A decision to temporarily suspend or transfer an employee must be approved by the UK HR Manager. Subcontractors, external consultants or anyone working on behalf of Coffey International Development Limited may be temporarily removed from the project to which they have been assigned.

8. Communication to Clients, Partners, Beneficiaries, host country governments and legal authorities

Depending on the exact nature of the allegation of abuse, exploitation or neglect and the extent to which it has the potential to affect other parties (for example, clients, partners, beneficiaries, host country governments), Coffey will ensure that it keeps those parties informed throughout the process. Where there is evidence to suggest illegal activity, Coffey will pass this evidence on to the relevant legal authorities including the police at the earliest possible opportunity.

This policy will be reviewed at least once a year. For further information please contact the Coffey's UK HR Manager.

Annex 1

Examples of Unacceptable Behaviour

The list below provides examples of unacceptable behaviour that will not be tolerated by the Coffey, both inside and outside of the workplace.

Coffey staff, consultants, partners and subcontractors may not:

- Engage in any form of sexual exploitation.
- Engage in transactional sexual contact.
- Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defence.
- Hit or otherwise physically assault or physically abuse anyone.
- Develop relationships with children or vulnerable adults which could in any way be deemed exploitative or abusive.
- Act in ways that may be abusive in any way or may place a child or a vulnerable adult at risk of abuse.
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- Behave physically in a manner which is inappropriate or sexually provocative
- Have a child or a vulnerable adult with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply and previous permission has been obtained from their line manager
- Sleep in the same room as a child or a vulnerable with whom they are working unless exceptional circumstances apply and previous permission has been obtained from their line manager
- Sleep in the same bed as a child or vulnerable adult with whom they are working
- Do things for children or vulnerable adult of a personal nature that they can do themselves
- Condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- Act in ways intended to shame, humiliate, belittle or degrade children or vulnerable adults, or otherwise perpetrate any form of emotional abuse
- Discriminate against, show unfair differential treatment or favour to particular children or adults to the exclusion of others.
- Spend excessive time alone with children or away from others in a manner which could be interpreted as inappropriate
- Expose a child to inappropriate images, films and websites including pornography and extreme violence
- Place themselves in a position where they are made vulnerable to allegation of misconduct

Annex 2

Safeguarding investigation process

