

ICF Europe and Asia Policy Safeguarding Policy

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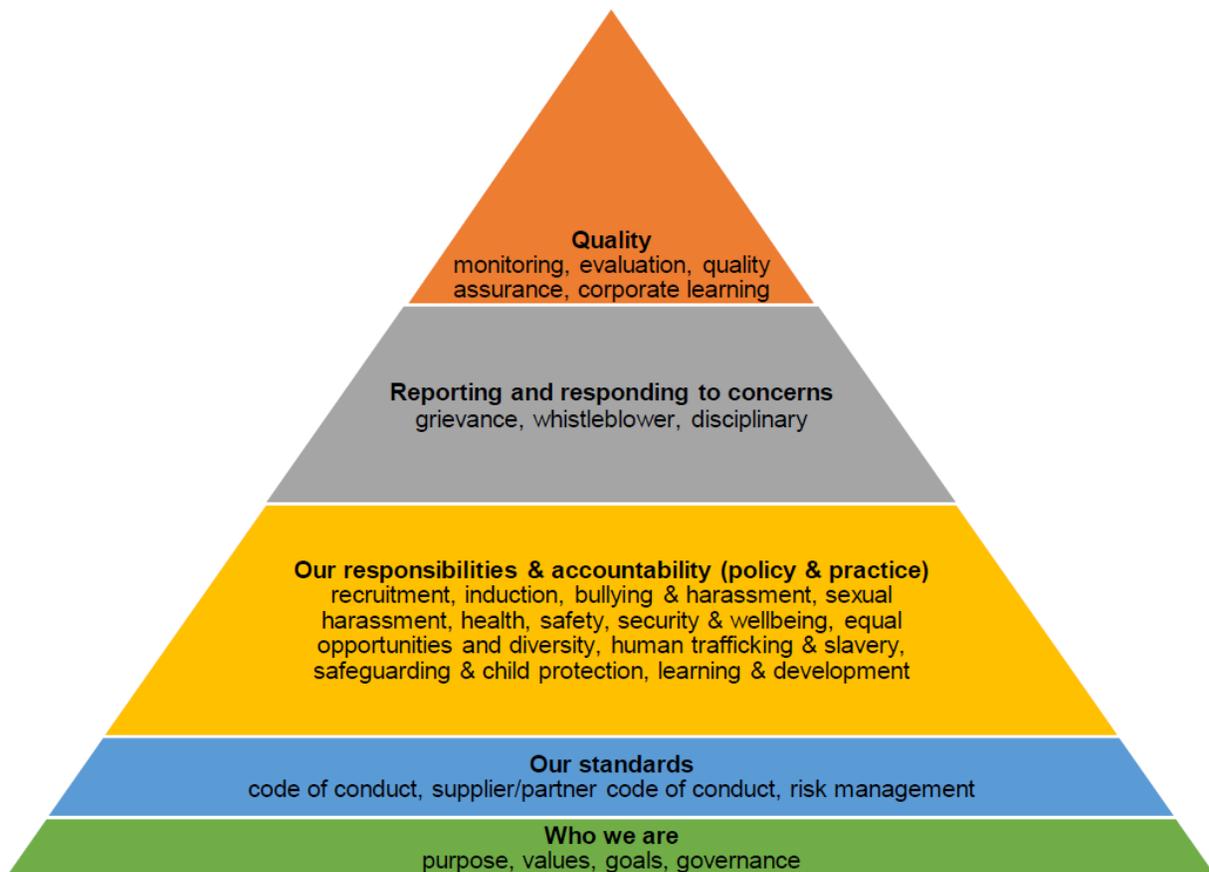


1. Purpose

This policy describes measures, adopted by the ICF operating group working and supporting projects in the Europe and Asia region (“ICF E&A”), which seek to prevent any harm to ICF employees, other persons acting on behalf of the company in those regions, and persons who encounter ICF E&A during its work, caused by harassment, bullying, sexual exploitation or abuse. Where harm does occur, this policy seeks to ensure ICF E&A’s response is both robust and proportionate, at the same time sensitive to the involved parties.

The ICF ‘Code of Business Ethics and Conduct’ outlines our policy, procedure or statements for respect for diversity, equal employment opportunity, harassment, safety and health, workplace violence, drug-free workplace and combating trafficking in persons. The values and conduct requirements set out in this document underpin ICF E&A’s offices approach to safeguarding.

In addition, this Safeguarding Policy (“the Policy”) is supported by ICF’s underlying values, standards, systems of governance and policies summarised in the diagramme below, that together contribute towards ensuring a positive safeguarding environment.



2. Applicable Audience

- 2.1.1. This Policy applies to ICF E&A employees, other persons acting on behalf of ICF E&A, other persons who encounter ICF E&A during its client work, and the ICF E&A legal entities. This includes clients, partners, suppliers, visitors to premises and temporary staff. The Policy is relevant to all aspects of ICF E&A's operations and business relationships, and especially where vulnerable adults, exploited workers, and children potentially may be affected.
- 2.1.2. Safeguarding is the responsibility of everyone employed by ICF E&A, its supply chain and project partners. Failure to comply with this Policy will be immediately addressed by ICF E&A senior management and may result in disciplinary action, including termination of employment and/or termination of wider business relationships.

3. Policy

3.1. Statement of Commitment

- 3.1.1. ICF E&A is committed to supporting and promoting the welfare of all its employees, other persons acting on behalf of the business, and other persons who encounter ICF E&A during its work, including vulnerable populations who may come in contact with ICF E&A, or any of its stakeholders, in the course of its business activities.
- 3.1.2. ICF E&A has a no-tolerance policy towards activities involving harassment, bullying, sexual exploitation or abuse, particularly where vulnerable populations are involved. This means that ICF E&A will take seriously any safeguarding concerns or allegations by responding quickly, investigating thoroughly, instigating the necessary disciplinary procedures and protecting and supporting all parties involved in the situation.
- 3.1.3. ICF E&A takes all safeguarding concerns seriously, and will deal with any suspicion or allegations raised confidentially, and in compliance with ICF E&A policies set out in the 'ICF E&A UK Employee Handbook' including chapters on Dignity at Work, Whistleblowing, Disciplinary and Grievance.
- 3.1.4. Everyone involved in ICF E&A business activity who comes into contact with vulnerable populations is responsible for becoming familiar with the requirements of this Policy, and for seeking appropriate guidance from ICF E&A prior to commencement of a project or initiative

3.2. Definitions

- 3.2.1. The term 'safeguarding' refers to ICF E&A's business operations and work practices to keep the people we encounter safe from harm. ICF E&A considers safeguarding to mean the prevention and response to harm caused by harassment, bullying, sexual exploitation or abuse, by anyone affiliated with or who comes into contact with ICF E&A.
- 3.2.2. Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:
- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading humiliating or offensive environment for that person; or
 - is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.
- 3.2.3. Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure another person.
- 3.2.4. Sexual exploitation and abuse is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from sexual exploitation of another person.
- 3.2.5. A vulnerable adult is a person who is at a higher risk of harm than others, due to their specific characteristics (for example, gender, race, ethnicity, health problems, low income, language barriers) or situation (for example, the person is operating in a context of power imbalance, is without income, protection or security, is in institutional care).
- 3.2.6. For the purposes of this policy, a child is defined as any individual under 18, regardless of whether the national age of majority is younger.
- 3.2.7. Where this policy refers to the 'ICF Board' this should be read as meaning all Boards of Directors within the ICF corporate group.
- 3.2.8. Where this policy refers to a 'partner' this should be read as meaning ICF's unincorporated joint venture consortium partners, who have entered into formal contract with ICF to support ICF E&A companies on this basis.

3.3. Safeguarding Principles

3.3.1. ICF E&A bases its safeguarding policy on these principles:

- It will demonstrate accountability to beneficiaries and survivors, including staff and associated personnel, prioritising those who have suffered and survived exploitation, abuse and violence, and design systems of accountability and transparency that have beneficiaries at their centre.
- It will demonstrate a step change in shifting organisational culture to tackle power imbalances and gender inequality; policies alone are not enough to prevent abuse. The responsibility lies with ICF E&A and senior management, not survivors to tackle all forms of sexism and discrimination and hold individuals to account.
- It will ensure that safeguards are integrated throughout the employment cycle so that it ensures strong checks are in place at the start of employment and regular training and performance management - reinforced by strong codes of conduct and standards - throughout an ICF E&A career.
- It will ensure full accountability through rigorous reporting and complaints mechanisms for any misconduct that occurs under the banner of its organisation, including by associated personnel. It will pursue all reported misconduct to the full extent for its own staff in its organisational procedures and refer to appropriate statutory regulatory authorities. It will seek to join any recognised system that may be created for sharing relevant information on staff and associated personnel who have committed acts that breach standards of conduct.
- It will ensure that concerns are heard and acted on through its strong whistleblowing policy and process, which protect anonymity and safety and that will ensure that ways of reporting are actively promoted.

3.4. ICF E&A Safeguarding Responsibilities

3.4.1. ICF E&A, as an operating group under the governance of the directors of the ICF E&A legal entities, with day-to-day responsibilities vested in senior management, will exercise prevention in these ways:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and associated policies/procedures.
- Design and undertake all of its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with ICF E&A. This includes the way in which ICF E&A gathers, stores, communicates or makes public any information about individuals in its programmes.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to the processes set out in the due processes described in the associated policies.

3.4.2. ICF E&A employees, partners and suppliers (subcontractors and consultants) will not:

Child safeguarding

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.
- Undertake any activity with a child, including, but not limited to, conversations, interviews, photos or video, audio taping or requesting any action of them, without ensuring their safety and well-being during and after the engagement, also ensuring that photography, videoing or audio taping has the express, fully informed, written or taped consent of a parent or adult guardian or caregiver.

Adult safeguarding

- Sexually abuse or exploit at-risk adults.
- Subject an at-risk or vulnerable adult to physical, emotional or psychological abuse, or neglect.
- Undertake any activity with an at-risk or vulnerable adult, including, but not limited to, conversations, interviews, photos or videos, audio taping or request any action of them without ensuring their safety and well-being during and after the engagement, also ensuring that photography, videoing or audio taping, has their express, fully informed, written or taped consent.

Protection from sexual exploitation and abuse

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, ICF E&A employees and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an ICF E&A staff member or associated personnel to the appropriate staff member.

3.5. ICF E&A Safeguarding Prevention

3.5.1. To mitigate the risk of recruiting unsuitable individuals ICF E&A uses a third party to conduct reference checks for all new hires. ICF E&A reserves the right to withdraw any offer of employment, or terminate employment, if the candidate fails to satisfactorily pass the reference process.

Successful UK-based applicants for posts likely to involve contact with vulnerable populations, and existing UK employees working with projects involving vulnerable persons, are requested to undergo a Disclosure and Barring Service (DBS) check. Any offer of employment, or authorisation to take up such project work, is strictly subject to a satisfactory DBS check.

ICF E&A will introduce appropriate mandatory safeguarding training for new ICF E&A leaders and employees working with ICF E&A, and thereafter, annual mandatory safeguarding training.

ICF E&A assesses the risks associated with all new client contracts, and in doing so identifies project locations and activities that may increase the risk of safeguarding issues occurring. Project teams are advised of this risk, and requested to mitigate such risk if required.

ICF E&A assesses all deployment or travel for project work or otherwise, where there may be an increased risk of safeguarding issues arising.

3.6. Safeguarding Across the Supply Chain

3.6.1. ICF E&A's partners and suppliers (subcontractors and consultants) are required to abide by ICF's corporate Code of Business Ethics and Conduct, which includes respect for diversity, equal employment opportunity, harassment, safety and health, workplace violence, drug-free workplace and combating trafficking in persons.

3.6.2. All ICF E&A partner and supplier contracts incorporate a copy of the ICF Code of Business Ethics and Conduct and this ICF E&A Safeguarding Policy. Partners and suppliers are required to declare that they have read and understood these policies and to share them with their own downstream suppliers working on the project.

3.6.3. Applying a risk-based approach, ICF E&A conducts due diligence on new partners and suppliers. In addition, ICF E&A will seek to introduce processes under which partners and suppliers working on projects involving vulnerable populations are required to undergo Disclosure and Barring Service (DBS) check, recognising that DBS checks are not available in all circumstances. ICF E&A reserves the right to terminate a contract if a supplier or partner fails to satisfactorily pass the reference process.



3.6.4. ICF E&A will seek to extend the provision of safeguarding training to its partners and suppliers who are likely to come into contact with vulnerable populations as part of their contract.

3.7. Safeguarding Other Persons

3.7.1. ICF E&A has a duty of care to safeguard other persons who encounter ICF E&A personnel in its day-to-day work; this includes collaborative partners, project beneficiaries and local communities.

3.7.2. In dealing with such groups and when undertaking research with vulnerable people, young people and children, ICF E&A will seek to implement the principles contained in this Policy where appropriate and subject to the consent of the organisations and stakeholders concerned.

3.8. Key Risk Areas

3.8.1. ICF E&A provides research and project services to governments, regulators, bilateral and multilateral institutions. Some of these projects may involve situations in which safeguarding issues will arise.

FOR EXAMPLE:

Direct Contact:

- An employee traveling on behalf of ICF E&A to places where child sexual exploitation is of concern, and the employee solicits children whilst on business travel;
- A consultant traveling on behalf of ICF E&A, and the consultant pays for prostitution;
- In the conduct of family research, the interviewer conducts a survey, interviewing family units together, and due to the nature of the research, this puts vulnerable adults or children in a compromising position;
- When surveying vulnerable adults or children, a subcontractor does not provide respondents with adequate information concerning the purpose of the survey and informed consent is not actually obtained (for children under 16 years, written consent of parents or carers must also be obtained).

Indirect Contact:

- Having access to sensitive data concerning vulnerable adults or children, and an ICF E&A partner shares their sensitive data with a third party without consent;
- Communicating with vulnerable adults or children through online platforms or social media, and an employee grooms children through direct messages.

4. Roles and Responsibilities

The ICF E&A directors and business unit leaders are fully committed to ensuring that safeguarding and its associated policies and processes are central to ICF E&A's good governance and accountability to the public, our partners and especially beneficiaries. Safeguarding will be managed and significant issues reported to the broader ICF Board through the mechanisms set up to ensure effective management and implementation of all of ICF E&A's people, policies and processes.

4.1. ICF E&A Safeguarding Officer

ICF E&A will have a designated Safeguarding Officer (normally the Head of Security) who will be a key contact person for reporting safeguarding concerns.

The Safeguarding Officer will report regularly on safeguarding issues to ICF E&A senior leadership.

The Safeguarding Officer will keep a detailed register of any safeguarding issues raised and actions to resolve them, treating historical allegations separately and differently from any current disclosures.

5. Procedures

5.1. Reporting Safeguarding Allegations

- 5.1.1. ICF E&A encourages all employees, partners, suppliers and other persons to raise any safeguarding concerns they may have about the conduct of others, or the way in which the business is run.
- 5.1.2. An ICF E&A employee has the opportunity to raise safeguarding issues with their line manager or Human Resources Department. The line manager will report the concern to the Safeguarding Officer, who will immediately instigate an investigation. If the employee believes their line manager to be involved in the safeguarding issue, or for any reason does not wish to approach their line manager, the employee should directly inform the Human Resources Department or the Safeguarding Officer. Alternatively, the employee may use the reporting channels set out below.
- 5.1.3. Employees, partners, suppliers and other persons can raise safeguarding concerns via the following channels:

ComplianceCommittee@icf.com, or
ICF International, Inc.
1902 Reston Metro Plaza
Reston, VA 20190
Attention: ICF E&A Safeguarding Officer

If an employee, partner, supplier or other person would prefer to report anonymously, employees, partners, suppliers or other persons may report to ICF's Ethics Hotline, 24-hours a day 7-days a week, as follows.

+1.866.373-6934 (U.S.) or
+1.844.641.5874 (Outside the U.S.) or
+0800 89 0011 (U.K.) wait for the prompt, then 866.373.6934, or

www.icf.ethicspoint.com



- 5.1.4. ICF E&A wishes to receive all honest concerns, and welcomes all reports made in good faith. A 'good faith' report means the reporter has accurately provided all relevant information and the report is sincere. Continued employment and opportunities for any employee, partner or supplier making a good faith report will not be prejudiced in any way.
- 5.1.5. ICF E&A strictly prohibits retaliation against employees who report or assist in reporting what they believe in good faith to be a safeguarding matter. Retaliation against an employee's report in good faith will result in disciplinary action, up to and including termination of employment for the retaliating employee(s).
- 5.1.6. It's important to note, the whistleblowing mechanism is designed to protect anyone who wishes to disclose a valid safeguarding concern. A report can be made either anonymously, or by disclosing the person's name. Whilst it is important to provide a mechanism that allows for anonymity, individuals are encouraged to provide as much information as possible, and consider disclosing their name. This means that ICF E&A is in a better position to gain further information and provide you with support. Any investigation into the safeguarding issue is strengthened when all parties concerned are known and can be supported.
- 5.1.7. ICF E&A's Whistleblowing policy outlines in more detail how to go about raising a safeguarding concern using the ICF Ethics Hotline.

5.2. Safeguarding Investigations

- 5.2.1. Any safeguarding matter raised will be investigated promptly and confidentially, and, if appropriate, disciplinary proceedings will be brought against the alleged perpetrator. As governed by applicable law, employees have the right to be accompanied by a work colleague of their choice at any meeting dealing with an allegation against them. They will be kept informed of the general progress of the investigation and the outcome of any proceedings.
- 5.2.2. ICF E&A will treat all safeguarding allegations sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis and any sensitive data will be kept secure at all times in accordance with the ICF Data Protection Policy.
- 5.2.3. Wherever possible, ICF E&A will try to ensure that the complainant and the alleged perpetrator are not required to work together while the complaint is under investigation. This could involve giving the complainant the option of remaining at home on special leave, if they wish. In serious cases, the alleged perpetrator may be suspended while investigations are underway.

- 5.2.4. ICF E&A's preference is to work collaboratively with its partners and suppliers to identify any conduct issues and to ensure that appropriate remediation steps are taken promptly. ICF E&A encourages its partners and suppliers to engage with ICF E&A at the earliest opportunity if they become aware of any difficulty in complying with this policy. Such difficulties can be raised through usual contacts at ICF E&A or through ICF's whistleblowing procedures. Where a safeguarding concern involves a supplier, ICF E&A will liaise with the partner or supplier and an agreement will be reached as to who will lead an investigation and what involvement ICF E&A will have. Wherever possible, ICF E&A will ensure the complainant and the alleged perpetrator will not work together while the complaint is under investigation.
- 5.2.5. Where a safeguarding concern is about another person, i.e. not a partner, supplier or employee, then ICF E&A will liaise with the parties concerned (or their legal representatives) and agree on an appropriate way to manage an investigation; to be either led by ICF E&A or by sharing and supporting local authorities (which may include local police) to manage the investigation.

5.3. Investigation Findings

- 5.3.1. If the complaint is upheld, and the alleged perpetrator person is an ICF employee then he/she will be subject to appropriate disciplinary measures. If the perpetrator person remains in employment with ICF every effort will be made to ensure that, if possible, the alleged perpetrator and the complainant (if he/she is an ICF employee) do not have to continue to work together, if they do not wish to do so. ICF E&A will discuss the options with the complainant and these may include staff transfer for either party.
- 5.3.2. If the complaint is not upheld, the Human Resources Department will support the complainant, the alleged perpetrator and their line manager(s) in making arrangements for all parties to continue or resume working together and to help to repair working relationships. ICF E&A will consider making alternative working arrangements should either party not wish to continue to work together.
- 5.3.3. If the investigation concerns a partner or supplier, any breach of the obligations stipulated in the safeguarding policy is considered a material breach of contract by that partner or supplier and may lead to a termination of the relationship with ICF E&A.

5.4. Reporting to Local Authorities

- 5.4.1. Where required under contract or by law, ICF E&A will report safeguarding matters to the client and to local authorities, and will take into account the human rights of those involved to ensure their safety and security is not compromised.
- 5.4.2. If a criminal offence may have been committed, ICF E&A may assist in accompanying the complainant to the police to make a statement.
- 5.4.3. ICF E&A will support any safeguarding investigation conducted by local authorities, which concerns anyone affiliated with ICF E&A.

6. Resources

List of policies/procedures that are related to this policy.

ICF Corporate Policies:

- Code of Business Ethics and Conduct
- Anti-Corruption Policy
- Statement and Plan on Human Trafficking and Modern Slavery

ICF E&A Regional Policies:

- E&A Security Policy

ICF E&A UK Policies - *PLEASE REFERENCE YOUR ICF E&A LOCAL POLICIES WHERE APPLICABLE:*

- ICF E&A Sexual Harassment Policy (in development)
- ICF E&A UK Employee Handbook, including:
 - Working with Children, Young and Vulnerable People Policy
 - Equal Opportunities
 - Dignity at Work (including 'What is Bullying & Harassment' and 'Investigation')
 - Anti-Bribery
 - Whistleblowing
 - Recruitment (including 'Security Checking Procedure' and 'Reference Checks')
 - Disciplinary
 - Grievance