

Safeguarding Statement and Policy

July 2018

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Safeguarding Statement and Policy

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1 Safeguarding Statement - children and adults at risk

Commitment

The Mott MacDonald Group (“the Group”) has zero-tolerance against all forms of abuse and exploitation. We are committed to acting ethically and with integrity to safeguard staff and the people we serve in general, and children and adults at risk of harm in particular.

The principles of good standards of behaviour and respect are embedded in the Group’s values of Progress, Respect, Integrity, Drive and Excellence (PRIDE). This policy and other Group policies form our overall framework for safeguarding staff and the communities we serve, including our Ethics; Equality, Diversity and Inclusion; Harassment and Bullying; Health and Safety; Slavery and Human Trafficking; and Social Responsibility policies.

We have put in place and enforce measures and controls that demonstrate our commitment to see that abuse and exploitation are not taking place in our projects. We are committed to obey the law of the countries we work in and to refer concerns about potentially criminal behaviour to the relevant authorities and to report these also to our clients.

Responsibility

The Group chair is responsible for the effective implementation and maintenance of this policy. The Group business management systems and risk director is responsible for implementing this policy, monitoring its use and effectiveness, and for auditing the control systems embedded in our business management systems. The Group safeguarding lead is responsible for providing staff with support in knowing how to recognise and respond to potential concerns.

General managers are responsible for their teams meeting our safeguarding standards on a day-to-day basis and for monitoring compliance with them. Project principals are responsible for incorporating safeguarding standards in projects.

All staff and our sub-contractors working with children and adults at risk of harm are responsible for meeting standards and reporting breaches and concerns.

Approach

We are committed to all staff and sub-contractors acting in compliance with the principles of safeguarding within this policy and as laid out in the UN Convention on the Rights of the Child.

We seek to build safe working environments through our safe recruitment, selection and vetting process, including background checks, disclosure statements and referees.

For staff working with children and adults at risk, safeguarding is mandatory. All contact with people at risk, including interaction through social media must meet the standards outlined in this policy. Each year these colleagues are required to review and sign this Safeguarding policy, as are our sub-contractors.

We encourage staff, sub-contractors and beneficiary populations to raise concerns without fear of reprisal, either through line managers or by using Speak Up, our confidential reporting service that is independently managed for us by [Expolink](#)

We investigate all reports with independent teams that are committed to maintaining confidentiality of reports. We seek to take swift action to support and protect children and adults at risk where concerns arise regarding possible abuse or exploitation.

This policy and how to access our helpline 'Speak Up' are available on our external Mott MacDonald web-site, on Compass the Group's intranet, and in all our offices.

2 Safeguarding Policy - children and adults at risk

2.1 Purpose

This policy sets out key principles that all staff, sub-contractors and volunteers working for Mott MacDonald should comply with to safeguard children and adults at risk of harm. It relates to the behaviour of Mott MacDonald staff and sub-consultants towards third parties, referred to as 'beneficiary' populations.

It also sets out how staff, sub-contractors and the people we serve can raise concerns and how we address and respond to these.

2.2 Application and scope

This policy applies to all Mott MacDonald staff, independent of their location, grade, type or duration of appointment, and including temporary appointment holders and secondees.

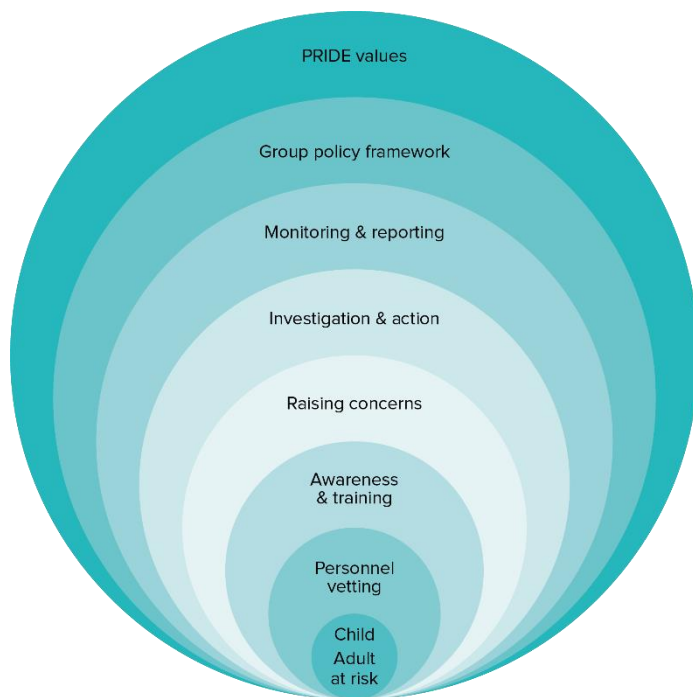
In its spirit and principles, this policy also applies to all Mott MacDonald sub-contractors, partner agencies, independent contractors, free-lancers, sub-consultants, volunteers and interns. For ease of reference for the purpose of this policy, these will be uniformly referred to as sub-contractors in this document.

This policy will be operationalised and embedded in day-to-day management through our business management systems. Related internal policies, procedures, and contractual documents will be amended to reflect established protection mechanisms.

This policy will be made public (published on Mott MacDonald's website).

2.3 Mott MacDonald safeguarding framework

This policy complements other Group policies, which together, with our PRIDE values, form the Group's overall framework for safeguarding our staff and the communities we serve. These include our Global Conditions of Employment and Group policies relating to Ethics; Equality, Diversity and Inclusion; Harassment and Bullying; Health & Safety; Slavery and Human Trafficking and Social Responsibility.



2.4 Statutory and regulatory framework

This policy is based on the main principles of safeguarding as laid out in the UN Convention of the Rights of the Child and relevant legislation.

We recognise that the statutory and regulatory context of the countries in which we work is different from that of the UK, where the Mott MacDonald Group is headquartered. Nevertheless, we are committed to staff acting in compliance with the main principles of safeguarding children and adults at risk. At the same time, we provide management such that staff are familiar and comply with the safeguarding principles as laid out in UK legislation and the national law in the countries where we work.

This policy should be read alongside the following Mott MacDonald [Group policies and procedures](#):

- Ethics
- Equality, Diversity and Inclusion
- Harassment and Bullying
- Slavery and Human Trafficking
- Speak Up (reporting and whistleblowing confidential line)
- Recruitment, induction and training
- Disciplinary Procedure
- Grievance Procedure
- Conflicts of Interest, Employee Relationships
- Health and safety
- Social Responsibility

2.5 Objectives

Mott MacDonald recognises that safeguarding children and adults at risk of harm is a shared responsibility, with the need for effective joint working not only across the Group but also

between agencies. To achieve effective joint working there must be constructive relationships at all levels, promoted and evidenced by:

- Executive lead at Board level for the Group, and all board members being accountable for safeguarding children and adults at risk of harm
- Recognition that communities that are in need of donor support are by their nature vulnerable and, as such, all adults and children within the communities are at risk and need safeguarding at all times
- Clear lines of accountability within the company for safeguarding
- Robust communication and escalation processes

Compulsory staff training for those working with people at risk, so that they understand what safeguarding children and adults really means and learn to recognise and respond appropriately to concerns about abuse

Safe working practices including recruitment, vetting and barring procedures.

Effective working across the Group, with our clients, partners and other agencies where appropriate, including effective information sharing whilst complying with General Data Protection Regulation 2016 (GDPR).

Designated Group safeguarding lead who will act as a vital source of advice for project managers and general managers.

Provision of guidance and support to those that are responsible for safeguarding.

2.6 Accountability structure for safeguarding in Mott MacDonald

Mott MacDonald's Group chair is accountable for providing overall assurance to the Executive Board and Shareholders' committee on the effectiveness and quality of the safeguarding arrangements.

The Group business management systems and risk director is accountable to the Executive Board for implementing this policy, monitoring its use and effectiveness, and for auditing the control systems embedded in Mott MacDonald's business management systems.

The Group safeguarding lead is accountable to the Group business management systems and risk director for ensuring that staff are supported in knowing how to recognise and respond to potential concerns and that the issue of exploitation and abuse is systematically integrated into information campaigns and trainings with beneficiary populations vulnerable to abuse and exploitation.

General managers are accountable to the Group's managing director for staff and sub-contractors meeting our safeguarding standards and for monitoring compliance.

Project managers and project principals are accountable for incorporating safeguarding standards in all projects, reporting concerns and responding appropriately to protect children and adults at risk of harm in a timely manner.

All staff are responsible for meeting our safeguarding standards and for reporting breaches and concerns.

Sub-contractors must review, sign and adhere to this policy.

2.7 Personnel vetting

Mott MacDonald has recruitment processes in place to prevent inappropriate persons being employed or contracted.

Based on the responsibilities set out in job description / role functions, recruitment managers shall seek guidance from Human Resources to determine whether further background checks are required, e.g. employment, criminal record or security checks.

For example, for staff and sub-contractors whose role involves working with, or having contact with children and adults at risk, the following checks of criminal record may be required:

Who	Type of check
UK based applicants	Disclosure and Barring Service (DBS) check
British citizens based outside UK	International child protection certificate (ICPC).
Non-UK citizens based outside UK	Try to obtain criminal record checks from the country of which the candidate is a citizen and/or from other countries where he or she has been resident.
	If not available, as a minimum requirement for HR to check two unrelated references about the suitability of the candidate to work with children or adults at risk.

In all cases, where prospective candidates will be appointed to work with or having contact with people at risk, Mott MacDonald requires that they sign a personal disclosure form verifying that there is no legal constraint on their working with children and adults at risk.

2.8 Awareness and training

All staff and sub-contractors are given training in the Group's safeguarding policies and procedures as part of the induction process and throughout their employment. This includes complying with our code of conduct and corporate values, ensuring that we support modern slavery and human trafficking legislation and what safeguarding children and adults at risk really means. The training helps them to recognise abuse and exploitation and to understand their safeguarding responsibilities and the need to report and disclose their concerns.

Currently we have three e-learning modules available to staff – "Safeguarding adults", "Safeguarding children", and "Safeguarding combined". We also have training on Modern Slavery, all of which are aligned to this policy.

Further levels of training will be determined by the responsibilities set out in job descriptions / role functions, e.g. for staff involved in specialist work with children in the UK.

2.9 Reporting concerns

If staff have any concerns that a child or adult is at risk of harm, abuse or exploitation, they should normally seek advice by raising any concerns with their line management.

Line managers must listen to and respect people raising concerns with them and ensure that details of any disclosure are formally registered with the Group general counsel. Line managers will:

- Protect employee confidentiality

- Report concerns raised to Group general counsel and business management systems and risks director
- Inform the employee of the relevant company procedures and processes
- If necessary implement preventive and/or corrective action to protect children and adults at risk
- Ensure that there is no victimisation or harassment of employees who make disclosures

In any circumstances where an employee feels unable to discuss a safeguarding concern with their line management, they should register their concern by contacting our independently managed confidential helpline 'Speak Up'. The employee who made the disclosure will receive confirmation that their disclosure has been registered in confidence. As with all such reporting, the Group is committed to ensure that there will be no retaliation or criticism of people raising genuine concerns and if reports are raised anonymously no attempt will be made to identify who raised the issue.

Given the importance of the international safeguarding agenda, failure to report known acts of abuse or exploitation may result in disciplinary sanctions.

Members of the public can also raise concerns about safeguarding either through our local offices or our independently managed helpline '[Speak Up](#)'. provide hyperlinks to This can be done:

- By phone: +44 20 7651 0300 and ask to speak with Group Business Management Systems and Risk Director
- By post, addressed to: Group Business Management Systems and Risk Director, 10 Fleet Place, London EC4M 7RB

2.10 Investigation and action

Whilst the Group's preference is for reports of concerns to be raised openly with line managers, we respect the anonymity of reports where national legislation does not prevent them, and measures are in place to protect people who make disclosures.

Any safeguarding concerns and allegations raised are to be reported without delay to Mott MacDonald's Group general counsel and director of business management systems and risk. They agree with the Group safeguarding lead and senior colleagues how each investigation is to be taken forward and by whom, with the aim of ensuring that concerns are investigated by people who are independent and have sufficient knowledge of the issue and are sensitive to the nature of the safeguarding concerns or allegations expressed, for example in relation to gender, sexual orientation, religion or culture. In cases of serious or sensitive breaches, investigations may be outsourced.

We take swift action to support and protect children and adults where concerns arise regarding possible abuse or exploitation.

Upon conclusion of the investigation, the Group general counsel and business management systems and risk director will make a decision on the appropriate course of action.

Based on the gravity of the situation and the evidence available, we refer concerns and alleged criminal behavior to the relevant authorities and report these also to our clients.

Malicious safeguarding reports made with the intention of harming the reputation of an individual or Mott MacDonald, or to take undue advantage of safeguarding mechanisms for personal benefit are considered misconduct.

2.11 Information sharing

Adhering to this policy is a condition of employment. Any behaviour in breach of this policy will lead to appropriate disciplinary action or dismissal.

During any investigation it is important that all involved remain confident that their personal information is kept safe and secure, whilst concerns and allegations are being investigated.

Information sharing must comply with the Mott MacDonald Information [Security Policy](#) and [Data Protection Policy](#), which comply with GDPR and are certified to ISO 27001.

Good information sharing practice is at the heart of good safeguarding practice. The area is covered by legislation, principally by the General Data Protection Regulation 2016. At its heart is the principle that information should be shared if that helps to protect children or adults, or to prevent a crime. In this context we will share information with third parties, including donor agencies.

2.12 Roles and responsibilities regarding monitoring and reporting

The chair is responsible for the effectiveness and maintenance of this policy.

On an annual basis **the chair** will produce a report for the Board which provides assurances across the following areas:

1. General managers and project principals are effectively performing their safeguarding duties.
2. Staff and sub-contractors are meeting safeguarding standards.
3. Robust processes and systems are in place that enable staff, sub-contractors and beneficiaries to raise concerns.
4. Effective arrangements are in place for responding to concerns and allegations and, where relevant seek to protect children and adults at risk in a timely manner.
5. Robust processes are in place to learn lessons from cases where children or adults at risk have not been safeguarded appropriately.
6. Mott MacDonald is appropriately engaged with sub-contractors and clients about safeguarding standards, sharing of best practice and information.
7. Mott MacDonald provides staff with appropriate training to carry out their responsibilities for safeguarding.

The Group business management systems and risk director is responsible for:

1. Implementation of the safeguarding policy.
2. Compliance with standards, policies and procedures, monitoring progress and managing risks across the company.
3. Ensuring that concerns or allegations raised are appropriately and confidentially investigated by people who have sufficient knowledge of the issues and are sensitive to the nature of the concerns or allegations expressed, for example in relation to gender, religion or culture.
4. Undertaking a review across all cases at least once a year to learn lessons, identify gaps and best practice.
5. Monitoring, revision and updating of this policy.

The Group safeguarding lead is responsible for taking the lead on advising on matters relating to the protection of children and adults at risk who are associated with Mott MacDonald. Responsibilities include:

1. Acting as a source of support, advice and expertise for staff and sub-contractors.
2. Ensuring that this policy and mechanisms for reporting safeguarding concerns are consistently made public in the locations where we implement projects.
3. Seeking to ensure that appropriate measures are taken when concerns are raised to protect the child/children and/or adults in question.
4. Working with project and territory teams to systematically integrate the issue of abuse and exploitation into information campaigns and trainings with beneficiary populations that are vulnerable to abuse and exploitation.
5. Oversight of and monitor progress of safeguarding concerns reported.
6. Advising on referrals and disciplinary actions.

General managers are responsible for assuring that safe working practices are in place in all units and projects in their respective regions, including in relation to:

1. Recruitment, vetting and barring procedures.
2. Staff safeguarding training and reviewing and signing this Safeguarding policy.
3. Responding to concerns and allegations in a timely manner and escalate when necessary.
4. Ensuring all their staff have access to this safeguarding policy and Speak Up.

General managers are responsible for reporting on these matters as part of the Board meetings that take place twice a year.

Project principals and managers have the responsibility to understand the safeguarding policy and the commitment of Mott MacDonald to ensure all staff are trained and supported. They are responsible for:

1. Ensuring that all project staff working with adults or children at risk have reviewed and signed this safeguarding policy.
2. Ensuring that all staff have been trained in safeguarding.
3. Providing a safe and supportive working environment.
4. Displaying this safeguarding policy and Speak Up posters in all project offices.
5. Seeking guidance from their line-manager of the Group safeguarding lead and/or escalate / refer when necessary.
6. Taking appropriate action when concerns or allegations are raised.

Staff have a responsibility to achieve and maintain the standards set out in this policy. They must therefore report any safeguarding concerns to their line-manager in the first instance. Alternatively, they can raise concerns using our confidential helpline 'Speak Up'. We respect the anonymity of reports, and measures are in place to protect people who make disclosures. Staff are also responsible for identifying development needs in relation to safeguarding children and/or adults at risk.

A. Safeguarding Policy Requirements

NSPCC

A safeguarding or child protection policy is a statement that makes it clear what an organisation or group will do to keep children safe.

It should include:

- a statement setting out the organisation's commitment to protecting all children
- what the organisation will do to keep children safe and respond to concerns
- a list of the supporting procedures that accompany the policy.

Source: <https://www.nspcc.org.uk/preventing-abuse/safeguarding/writing-a-safeguarding-policy/>

UK Government

A safeguarding or child protection policy is a statement of intent that demonstrates a commitment to safeguard children involved with a charity from harm. The essential inclusions for a child protection policy are outlined below:

- the welfare of the child is paramount
- no child or group of children must be treated any less favorably than others in being able to access services which meet their particular needs
- all children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs
- the policy is reviewed, approved and endorsed by the board of trustees annually or when legislation changes
- who the policy applies to (ie all trustees, staff and volunteers)
- children and parents are informed of the policy and procedures as appropriate
- all concerns, and allegations of abuse will be taken seriously by trustees, staff and volunteers and responded to appropriately - this may require a referral to children's social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff, trustees and other volunteers, and in emergencies, the police
- a commitment to safe recruitment, selection and vetting
- reference to principles, legislation and guidance that underpin the policy
- arrangements for policy and procedures review
- reference to all associated policies and procedures which promote children's safety and welfare eg with regards to: health and safety, anti-bullying, protection of children online, and photography.

Source: <https://www.gov.uk/government/publications/safeguarding-children-and-young-people/safeguarding-children-and-young-people>

DFID requirements as set out by Penny Mordaunt, 20 February 2018

All aid agencies to put in place safeguarding policies for children and vulnerable adults, which include:

- Zero tolerance statement
- Report the incident
- Follow up on / responding to incidents of wrongdoing when they occur (holding to account)
- Report to prosecuting authorities any criminal activity
- Report to donor agencies

DFID has created a new Safeguarding Unit, with recognised leadership reporting directly to Penny Mordaunt.

B. Glossary of Terms¹

For the purpose of this policy, terminology used is defined as set out below.

Abuse is a misuse of power and control which one person has over another. Abuse can occur in any relationship and may result in significant harm or exploitation. It can take many forms including physical, financial, verbal, or psychological. It can be the result of an act or a failure to act.

Child - a “human being below the age of eighteen years”².

Adults at risk of harm are defined as follows:

- those aged over 18 years and who identify themselves as unable to take care of themselves / protect themselves from abuse or exploitation; or
- those who due to their gender, mental or physical health, disability, or as a result of disasters and conflicts, are deemed to be at risk.

Safeguarding is a term used to describe how we protect children and adults at risk from harm. Safeguarding is about protecting people who may be in vulnerable circumstances. These people may be at risk of abuse or exploitation due to the actions (or lack of action) of another person.

Beneficiary population - refers to the people Mott MacDonald seeks to assist across the world, who are typically in situations of vulnerability and dependence relative to Mott MacDonald staff. Beneficiaries are individuals who are direct or indirect recipients of Mott MacDonald projects, including aid programmes funded by donor agencies.

Sexual abuse - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Examples of acts of sexual exploitation and abuse³

Sexual assault (defined as “any unwanted or forced sexual act committed without consent”) or threat thereof. Sexual assault can occur either against a person’s will, by force or coercion, or when a person is incapable of giving consent, such as when they are under duress, under the influence of drugs or alcohol.

Force includes:

- actual physical aggression, including but not limited to: rape, forcible sodomy, forcible oral copulation, sexual assault with an object, sexual battery, forcible fondling (e.g., unwanted touching or kissing);
- threats of physical aggression;
- emotional coercion; and/or
- psychological blackmailing.

Unwanted touching of a sexual nature

Demanding sex in any context

Making sex a condition for assistance

¹ Definitions have been sourced from WHO and other UN agencies that have policies in place on safeguarding / sexual exploitation and abuse prevention and response.

² Convention on the Rights of the Child (General Assembly resolution 44/25 of 20 November 1989). This excludes situations where a Mott MacDonald staff member is legally married to someone under the age of 18 but over the age of majority or consent in both the Mott MacDonald staff member and spouse’s country of citizenship.

³ WHO Sexual Exploitation and Abuse Prevention and Response (policy and procedures March 2017), Office of Compliance, Risk Management and Ethics.

Forcing sex, or forcing someone to have sex with anyone
Forcing a person to engage in prostitution or pornography
Refusing to use safe sex practices
Videotaping or photographing sexual acts and publishing or sharing it without permission
Alleging or threatening to allege that anyone already has a history of prostitution on legal papers
Name-calling with sexual epithets
Insisting on anything sexual, including jokes that may be uncomfortable, frightening or hurtful
Telling someone that they or anyone else are obliged to have sex as a condition for anything.

Sub-contractor – individuals who work for Mott MacDonald as non-staff members including consultants, temporary advisers, interns and volunteers, as well as third party entities such as vendors, contractors or technical partners who have a contractual relationship with Mott MacDonald.

Victim – the person who is, or has been abused or exploited.

C. Overview of Mott MacDonald’s Safeguarding Responsibilities and Reporting, Investigation, and Action Proceed

Safeguarding Children and Adults at risk

Roles and Responsibilities



Safeguarding Reporting, Investigation and Action

