

IMC WORLDWIDE GROUP SAFEGUARDING POLICY

The IMC Worldwide Group (IMC) is fully committed to embedding best practice into the culture of our company and demonstrating this in the projects we deliver, ensuring that we do no harm to any beneficiary community. As a business we have a robust Business Ethics Policy, Anti-Harassment & Bullying Policy and this Safeguarding Policy setting out governing principles for our employees and independent consultants, and the employees of our partners and suppliers.

NOTE: you may find the Glossary in section 4 helpful.

1 PURPOSE & SCOPE

The purpose of this policy is to protect people, particularly children and at risk adults from any harm that may be caused due to their coming into contact with IMC. This includes harm arising from:

- The conduct of the IMC Worldwide Group employees or programme personnel associated with the IMC Worldwide Group.
- The design and implementation of IMC's programmes and activities.

The policy lays out the commitments made by the IMC Worldwide Group, and informs employees and associated programme personnel of their responsibilities in relation to safeguarding.

This policy applies to **all IMC Worldwide Group employees, permanent or otherwise**. This policy also applies to **all associated personnel** whilst engaged with work or visits related to the IMC Worldwide Group, including but not limited to the following: independent consultants; contractors' employees; contractors' independent consultants; programme visitors including client representatives, journalists, celebrities and politicians.

2 POLICY STATEMENT

IMC ensures that we, as a business, act with integrity throughout our work. The **Safeguarding Policy** complements our **Business Ethics Policy** and **Anti-Harassment & Bullying Policy** by identifying safeguarding needs and setting policies for all our employees and all associated personnel to follow. **The IMC Worldwide Group expects all our partners and suppliers to ensure similar measures are in place within their organisations. We are happy to work with partners and suppliers to manage this across our supply chains.**

The IMC Worldwide Group believes that **everyone** we come into contact with, regardless of age, gender, disability or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. The IMC Worldwide Group will not tolerate abuse and exploitation by employees or associated personnel.

This policy will address the following areas of safeguarding: child and adult safeguarding and also protection from sexual exploitation and abuse (PSEA).

The IMC Worldwide Group commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

3 WHAT IS SAFEGUARDING?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. **IMC has a zero-tolerance stand on exploitative and abusive relationships.** PSEA and child protection come under this umbrella term.

Safeguarding applies consistently and without exception across our programmes, partners and employees. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred, and also protect those accused until proven guilty.

The IMC Worldwide Group takes harassment and bullying very seriously and our policy for dealing with such cases is spelt out in our Anti-Harassment and Bullying Policy¹.

4 GLOSSARY

Associated Personnel - anyone engaged with work or visits related to the IMC Worldwide Group, including but not limited to the following: independent consultants; contractors' employees; contractors' independent consultants; programme visitors including client representatives, journalists, celebrities and politicians.

Beneficiary of Assistance - someone who directly receives goods or services from an IMC Worldwide Group's programme

Child - A person below the age of 18

Harm - Psychological, physical and any other infringement of an individual's rights

Psychological harm - Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA) - The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by employees or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding - Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. **The IMC Worldwide**

¹ For IMC's Anti-Harassment and Bullying Policy, please visit: <https://www.imcworldwide.com/policies/>

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Safeguarding Focal Point - a person designated to receive complaints of cases of sexual exploitation and abuse. This may be based on a geographic area or programme remit.

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

Sexual exploitation - The term 'sexual exploitation' means 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 the sexual exploitation of another.

Survivor - The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult - Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

5 PREVENTION – RESPONSIBILITIES

5.1 The IMC Worldwide Group's responsibilities

The IMC Worldwide Group pledges to:

- Ensure its employees and associated personnel are aware of and comply with the IMC Worldwide Group's **Safeguarding Policy**.
- Actively demonstrate commitment to the IMC Worldwide Group's **Business Ethics Policy**², and ensure its employees and associated personnel are aware of and committed to this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with IMC. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when **recruiting**, managing and deploying employees and associated personnel.
- Implement robust **due diligence** on those that we do recruit or contract to work with us.
- Ensure employees and associated personnel receive **training** on safeguarding at a level commensurate with their role in the organisation.
- Ensure all employees and suppliers are aware of and understand the **Whistleblowing**³

² For IMC's Business Ethics Policy, please visit: <https://www.imcworldwide.com/policies/>

³ For IMC's Whistleblowing Policy, please visit: <https://www.imcworldwide.com/policies/>

procedures for the reporting of suspected breached of this policy or observed acts of human rights abuse/modern slavery/human trafficking and sexual exploitation.

- Follow the **international and national laws** regarding the protection of children and vulnerable adults including; The Children Act (1989 and 2004)⁴, United Nations Convention on the Rights of the Child (1989)⁵, and The Equality Act (2010)⁶.
- **Support and guide those who raise a query** about a suspected breach of this policy.
- **Follow up** on reports of safeguarding concerns promptly and according to due process.
- **Investigate and report** on all allegations of sexual abuse and exploitation.

5.2 Employees and Associated Personnel responsibilities

The IMC Worldwide Group employees and associated personnel **must not**:

- Engage in sexual activity with anyone under the age of 18 (or older if illegal in country).
- 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.
- Sexually abuse or exploit at risk adults.
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect.
- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance or services related to the IMC programme.
- Engage in any sexual relationships with beneficiaries of assistance or services related to the IMC programme, since they are based on inherently unequal power dynamics.
- Use unequal power relationships for personal gain.

Additionally, the IMC Worldwide Group employees and associated personnel are obliged to contribute **to an organisational culture where safeguarding is a priority by**:

- Contributing to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Reporting any concerns or suspicions regarding safeguarding violations by an IMC Worldwide Group employee or associated personnel to the appropriate Safeguarding Focal Point.
- Undertaking training as required by the IMC Worldwide Group.
- Seeking guidance and advice if unsure about a potential breach of this policy.
- Notifying IMC of any criminal charges or allegations during employment or prior to employment.

6 REPORTING A CONCERN OR A SUSPECTED BREACH

The IMC Worldwide Group will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to employees and the communities we work with. Any employee reporting concerns or complaints will be protected by IMC's Whistleblowing Policy which is available on the IMC

⁴ For the Children Act 1989, please visit <http://www.legislation.gov.uk/ukpga/1989/41/contents>, and for the Children Act 2004, please visit <http://www.legislation.gov.uk/ukpga/2004/31/section/10>

⁵ For the United Nations Convention on the Rights of the Child, please visit https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf?_ga=2.127465221.963662948.1520603143-1591007942.1520603143

⁶ For the Equalities Act, please visit <https://www.gov.uk/guidance/equality-act-2010-guidance>

website (<http://www.imcworldwide.com/policies/>). The IMC Worldwide Group will also accept complaints from external sources such as members of the public, partners and official bodies.

6.1 How to report a safeguarding concern

Employees who have a complaint or concern relating to safeguarding should report it immediately to IMC's Safeguarding Manager – Adele.Monk@imcworldwide.com. If the employee feels more comfortable reporting to someone more familiar to them, they may report to any other appropriate employee or a local Safeguarding Focal Point. For example, this could be a Senior Manager or a Regional Director.

7 GUIDANCE ON RECEIVING A REPORT

Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If you hear something in an informal discussion or chat that you think is a safeguarding concern, you should report this to the Safeguarding Manager or our [Whistleblowing facility](#)⁷.

If a safeguarding concern is disclosed directly to you, as the person receiving the report you should bear the following in mind:

DO:

- Listen
- Let them know that you have a responsibility to pass on the report confidentially
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Tell the person what you will do next
- **Report to IMC's Safeguarding Manager or IMC's Whistleblowing facility.**

DO NOT

- Become defensive
- Argue with the person
- Be dismissive
- Blame others
- Make assumptions without knowing the facts
- Make promises you can't keep
- Ignore the problem
- Try to investigate yourself

Due to the sensitive nature of safeguarding concerns, **confidentiality must be maintained during all stages** of the reporting process, and information shared on a limited '**need to know**' basis only. This includes senior management who might otherwise be apprised of a serious incident. The person receiving the report should then forward this information in writing to the Safeguarding Manager within **24 hours**.

⁷ www.imcworldwide.ethicspoint.com

8 PROTECTION AND SUPPORT

Employees who make complaints or who participate in good faith in any investigation **must not suffer any form of retaliation or victimisation** as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that harmful practices are, or may be, taking place in any part of our business or in any of our supply chains.

If you believe that you have suffered any such treatment, you should inform the Human Resource Manager immediately or appropriate Regional Director. If the matter is not remedied, and you are an employee, you should raise it formally using the IMC Grievance Procedure, which can be found on the IMC Intranet.

9 RESPONSE

The IMC Worldwide Group will follow up safeguarding reports and concerns according to IMC's Safeguarding Procedures and Safeguarding Investigation Procedures.

The IMC Worldwide Group will offer support to survivors of harm caused by employees or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

The IMC Worldwide Group will apply appropriate disciplinary measures to employees found in breach of this policy. The IMC Worldwide Group may terminate our relationship with other individuals and/or organisations working on our behalf if they breach this policy.

10 ASSOCIATED POLICIES

- Business Ethics Policy
- Whistleblowing Policy
- Anti-Harassment and Bullying Policy
- Anti-Slavery and Human Trafficking Policy
- Disciplinary Policy
- Grievance Policy
- IT and Acceptable Use Policy
- Social Media Policy



Gavin English, Managing Director, the IMC Worldwide Group