

How to report a safeguarding concern?

If you are concerned about or have experienced harassment, abuse or any behaviour that violates our values or culture of respect you can report it by:

- Contacting a UK Safeguarding Officer or your project's Safeguarding Focal Point.
- Emailing CUereporting@tetrattech.com

If you need immediate help, please speak to one of the Safeguarding Officers or the Focal Point directly.

If you prefer to remain anonymous or are worried that your concern has not been taken seriously, you can also report it using our whistleblowing procedures. Your call will be registered with an independent body which will take your concern and report it on your behalf. You can do this:

- Online tetrattech.ethicspoint.com
- Anonymously by phone (free international number): 001-770-582-5289

Please remember that timely reporting can help us protect our staff, partners, beneficiaries and at-risk groups.

The above reporting procedures are further explained on page 5-6 of this policy.

1. Purpose and scope

Tetra Tech 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 is 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 Tetra Tech'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. Staff are also responsible for making sure that safeguarding requirements outlined in the policy are met on all projects and in all offices. Annex 1 details examples of unacceptable behaviours (non-exhaustive).

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

2. Our Commitment

Our commitment to safeguarding is aligned with the UK's Safeguarding Strategy¹ and voluntary Private Sector Commitments on Safeguarding² and Common Approach to Sexual Exploitation, Abuse and Harassment (CAPSEAH)³. We will do all we can to prevent incidents of sexual exploitation and abuse and sexual harassment from happening, but where they do occur, we will take a zero-tolerance approach to ignoring, covering up or mishandling cases.

3. References

Tetra Tech has numerous policies, procedures and measures in place to protect people. The safeguarding policy should

¹ UK Strategy: Safeguarding Against Sexual Exploitation and Abuse and Sexual Harassment within the Aid Sector (September 2020).

² Private Sector Commitments available at Safeguarding Network: <https://www.safeguardingnetwork.com/>

³ Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment <https://capseah.safeguardingsupporthub.org>

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Sign off Managing Director	DJ		

be read in conjunction with other policies including:

- Whistleblowing Policy
- Tetra Tech Code of Conduct
- Modern Slavery Act Statement
- Equal Employment Policy
- Gender Equality Policy
- Recruitment Policy
- Health and Safety Policy
- Conflict of Interest Policy
- Anti-Bribery and Corruption Policy

4. Definitions

Safeguarding: taking all reasonable steps to prevent abuse from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.⁴

Safeguarding Focal Point: Project-specific focal point responsible for safeguarding at a project-level. Safeguarding Focal Point is a point of contact for anyone who wants to raise a concern or complaint including staff, beneficiaries, subcontractors and consultants. Every project must have at least one Focal Point.

Safeguarding Officers: Overall Tetra Tech International Development Europe safeguarding points of contact for anyone who wants to raise a concern or complaint, including staff, beneficiaries, subcontractors and consultants. Safeguarding Officers will have up-to-date knowledge of safeguarding, as well as be responsible for managing safeguarding reports and investigations.

Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment (CAPSEAH): Created by a multi-stakeholder group, the aim is to help all people and organisations working in humanitarian, development and peace (HDP) sector to take action to protect people from Sexual Exploitation, Sexual Abuse and Sexual Harassment. The core principles and minimum actions expected to be followed by the participants.

Abuse: Abuse consists of anything which individuals, institutions or processes do or fail to do which directly or indirectly harms adults at risk or children, or damages their prospect of safe and healthy development.

Please note that while other organisation's safeguarding policy might focus primarily on sexual exploitation and abuse and sexual harassment, this policy applies a broader scope which covers all forms of abuse as defined by WHO, including physical and emotional abuse.

Child: Anyone under the age of 18

Person 'at risk': 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.

Some people who our projects come into contact with may be exposed to higher safeguarding risks than others. The risk level will be affected by their individual characteristics and vulnerabilities (such as gender, ethnicity, ability level, ability to safely report an incident, reliance on project staff for basic services etc.). Staff should take those context-specific factors into account, especially when working with marginalised groups, as a part of the safeguarding risk management, awareness raising and case management processes.

Sexual abuse⁵: Actual or threatened physical intrusion of a sexual nature (understood as physical contact of a sexual nature), whether by force or under unequal or coercive conditions.

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. "Sexual exploitation" is a broad term, which includes a number of acts, including but not limited to, transactional sex, solicitation of transactional sex and exploitative relationship.

⁴ Definition adapted from the Safeguarding Resource Support Hub

⁵ Tetra Tech applies the United Nations definitions of sexual abuse, exploitation and harassment

Sexual exploitation of a child: Any sexual exploitation of a child who is under the age of 18. Tetra Tech considers that:

- a) 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.
- b) An underage child cannot give informed consent to sexual activity. Therefore '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 will be dealt with as a breach of this safeguarding policy and the Code of Conduct.

Sexual harassment: Sexual harassment refers to prohibited conduct in the work context and can be committed against staff and related personnel. It involves any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Survivor-centred support: Tetra Tech's approach to victims, survivors and whistle-blowers, based on respect for human rights, in which they will be responded to with respect, confidentiality, safety and non-discrimination. We will place the rights, needs and wishes of victims and survivors at the centre of reporting, investigative, complaints and response systems.

5. Policy implementation

Programme Managers are responsible for making sure that all project staff are aware of the safeguarding policy and its implications on the project, as well as the reporting procedures. A checklist for Programme Managers is included in Annex 4.

5.1 Safeguarding reporting procedures and whistleblowing

- Detailed information about how to report and what happens once the report has been made are included in section 6 and Annex 2 of this policy. All staff also have access to Tetra Tech whistleblowing procedures described in section 6 and Tetra Tech's Whistleblowing policy.

5.2 Human Resources procedures

- Our safeguarding human resource policies, procedures and training will prioritise prevention and response to Sexual Exploitation, Abuse and Sexual Harassment (SEAH).
- Staff are also required to follow rigours vetting procedures outlined in Annex 3 during the recruitment process, as well as take candidate's understanding of safeguarding into account. This can be done by:
 - Including specific questions on safeguarding in staff interviews to demonstrate to candidates that Tetra Tech has a zero-tolerance approach to abuse and exploitation, as well as to ensure the candidate is able to meet their obligations under this policy.
 - Asking referees to raise any concerns regarding the individuals' conduct in previous roles.
- Vetting checks are designed to prevent perpetrators moving around the sector undetected.

5.3 Staff training and awareness

- All employees in the UK and internationally, subcontractors, suppliers and external consultants and anyone working on behalf of Tetra Tech International Development Limited must abide by the Safeguarding policy.
- All employees in the UK and internationally, subcontractors, suppliers 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 and/or inductions.
- Information about the Safeguarding Policy and relevant referral and reporting mechanisms will be displayed in Tetra Tech corporate and programme offices.
- All Safeguarding Officers will receive safeguarding and safeguarding case management training.

5.4 Risk Management processes

- Our safeguarding risk management processes will prioritise prevention and response to SEAH
- Programme Managers must ensure that safeguarding is included as a risk in every project risk assessment to ensure that all projects identify relevant risks and mitigation plan
- All Programme 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.

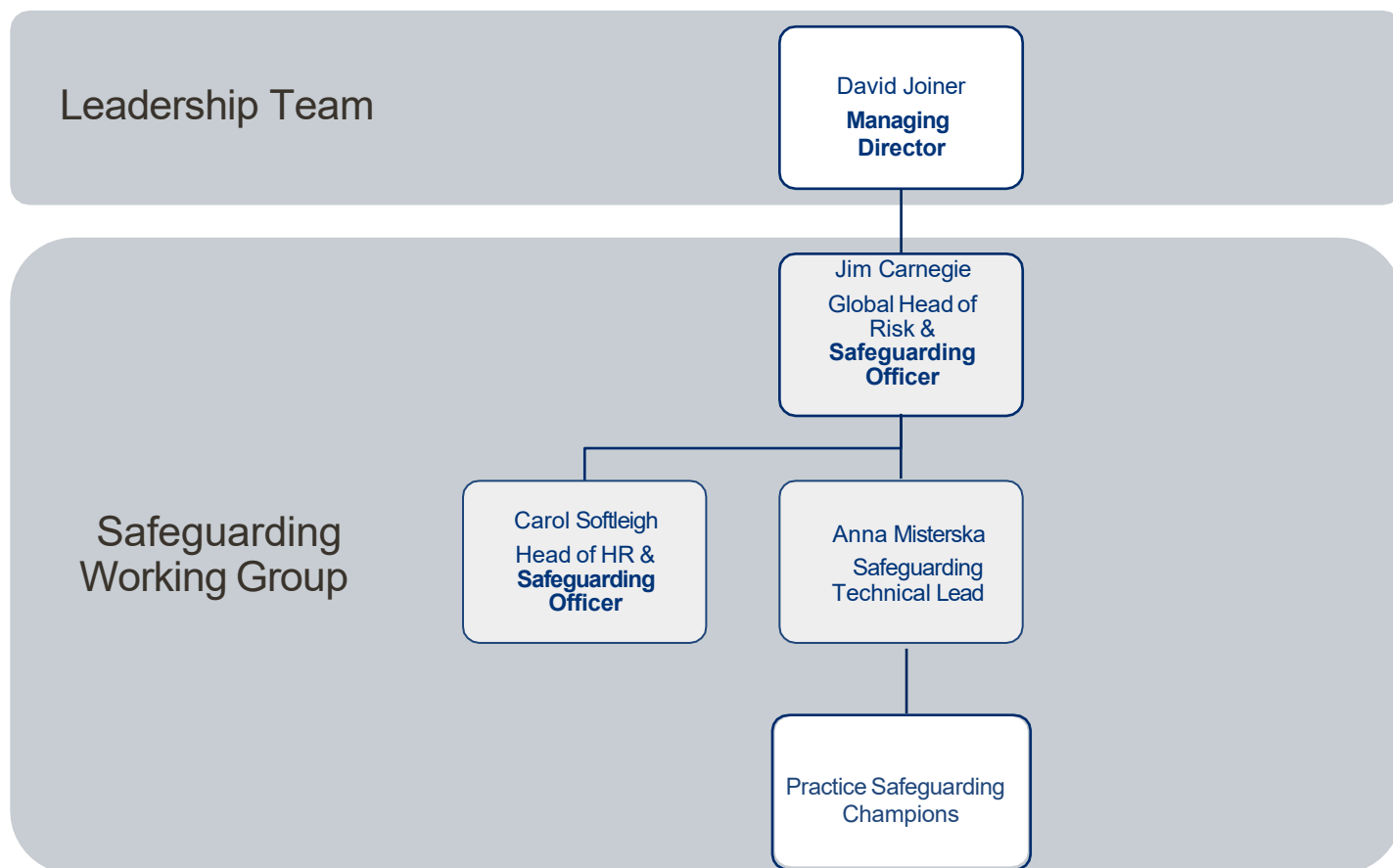
5.5 Working with partners

- All subcontractors must abide by the Tetra Tech Safeguarding Policy.
- The Safeguarding Policy must be included as an annex to all subcontracts.
- We will conduct in-depth due diligence assessments for all subcontractors, including due diligence checks which will assess organisation's ability to meet the obligations of the Safeguarding Policy, including the prohibition of SEAH
- We will provide training and clear guidance on expectations to partners. Programme Managers must ensure that our subcontractors understand the wording used in the policy and our commitment to safeguarding, to ensure the obligation of all to uphold safeguarding standards and behaviours is clearly understood and implemented. All partners should receive training on the Tetra Tech Safeguarding Policy and project-specific reporting procedures.

5.6 Governance and accountability structures to drive up organisational standards

Our Safeguarding Officers are the main persons involved in receiving and managing safeguarding allegations. They report directly to the Managing Director through the Head of Risk. This ensures easy reporting to, and involvement of, senior leadership in safeguarding.

In parallel to that, Tetra Tech has a Safeguarding Working Group which brings together champions from all practices. This initiative is primarily aimed at regularly engaging staff on safeguarding, sharing best practice internally and externally, as well as serve as a resource hub for project staff. The Working Group and Safeguarding Champions contribute to creating a safeguarding culture within Tetra Tech.



5.7 Safeguarding in research and communications

- When conducting research, Tetra Tech 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.
- Anyone working on behalf of Tetra Tech International Development will obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. Staff must ensure they explain how the images will be used, as well as ensure photographs, videos or any other images present children in a dignified and respectful way and not in a vulnerable or submissive manner. They also need to ensure that no

identifying details about a child are included when sending images electronically or publishing them in any form.

6. Reporting and handling incidents and allegations

Tetra Tech has a 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 how incidents and allegations are handled in Tetra Tech below. This process is also captured in a flow chart in Annex 2.

Initial Reporting: All allegations or concerns of abuse or breach of our Safeguarding Policy should be reported to a Safeguarding Focal Point (in-country or the UK). The first priority of the Safeguarding Focal Point is to ensure that the person concerned is at no risk of further harm.

Reports can also be made directly to the UK Safeguarding Officers by emailing CUereporting@tetrattech.com. Up to date reporting procedures are displayed in Tetra Tech offices.

Reporting to UK HR and Senior Management: As soon as an incident is reported, the Safeguarding Focal Point will refer the allegation to the Tetra Tech Safeguarding Officers immediately who will manage the process from this point onwards. Tetra Tech UK based Safeguarding Officers are Jim Carnegie, Carol Soffleigh and Anna Misterska.

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, Tetra Tech will report the case to the relevant authorities and collaborate with their investigation.

1. Safeguarding Committee to convene: The UK Head of HR will arrange for the Safeguarding Committee to meet (consisting of the Global Head of Risk and Compliance, Head of HR, Practice Director and Managing Director). 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).

2. 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.

Disciplinary Procedures

In the event the allegations are upheld the case will be referred to Tetra Tech 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 Tetra Tech HR.

Right to Appeal

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

Additional information

- 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.
- 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 Tetra Tech has a whistleblowing policy that encourages staff to speak out where they

"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 2349250 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".

have a concern about 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 2349250). Staff are reminded of the company whistleblowing policy on a regular basis at meetings, via email and through posters.

All complaints and allegations that come through the whistleblowing hotline are relayed to Tetra Tech Corporate and the Tetra Tech UK Managing Director. Any complaint or allegation is immediately referred to Tetra Tech UK HR and a meeting of the Safeguarding Committee will be convened.

Whistleblowing alternatives

Where staff have doubts or concerns about making an allegation or complaint, Tetra Tech refers them to Public Concern at Work, an 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

When working on FCDO projects, you can also report directly to FCDO at reportingconcerns@fcdo.gov.uk.

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 Tetra Tech 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 Head of HR 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 takes place before any disciplinary action be taken against an employee, subcontractors, external consultants and anyone working on behalf of Tetra Tech 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 Tetra Tech 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 Head of HR. Subcontractors, external consultants or anyone working on behalf of Tetra Tech International Development Limited may be temporarily removed from the project to which they have been assigned.

8. Communication with 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), Tetra Tech will ensure that it keeps those parties informed throughout the process. Where there is evidence to suggest illegal activity, Tetra Tech will pass this evidence on to the relevant legal authorities including the police at the earliest possible opportunity.

Programme Managers should familiarise themselves with safeguarding client reporting requirements on their projects (e.g. how soon after the allegation is made does the client want to be notified?).

This policy will be reviewed at least once a year. For further information please contact Tetra Tech's UK Head of HR.

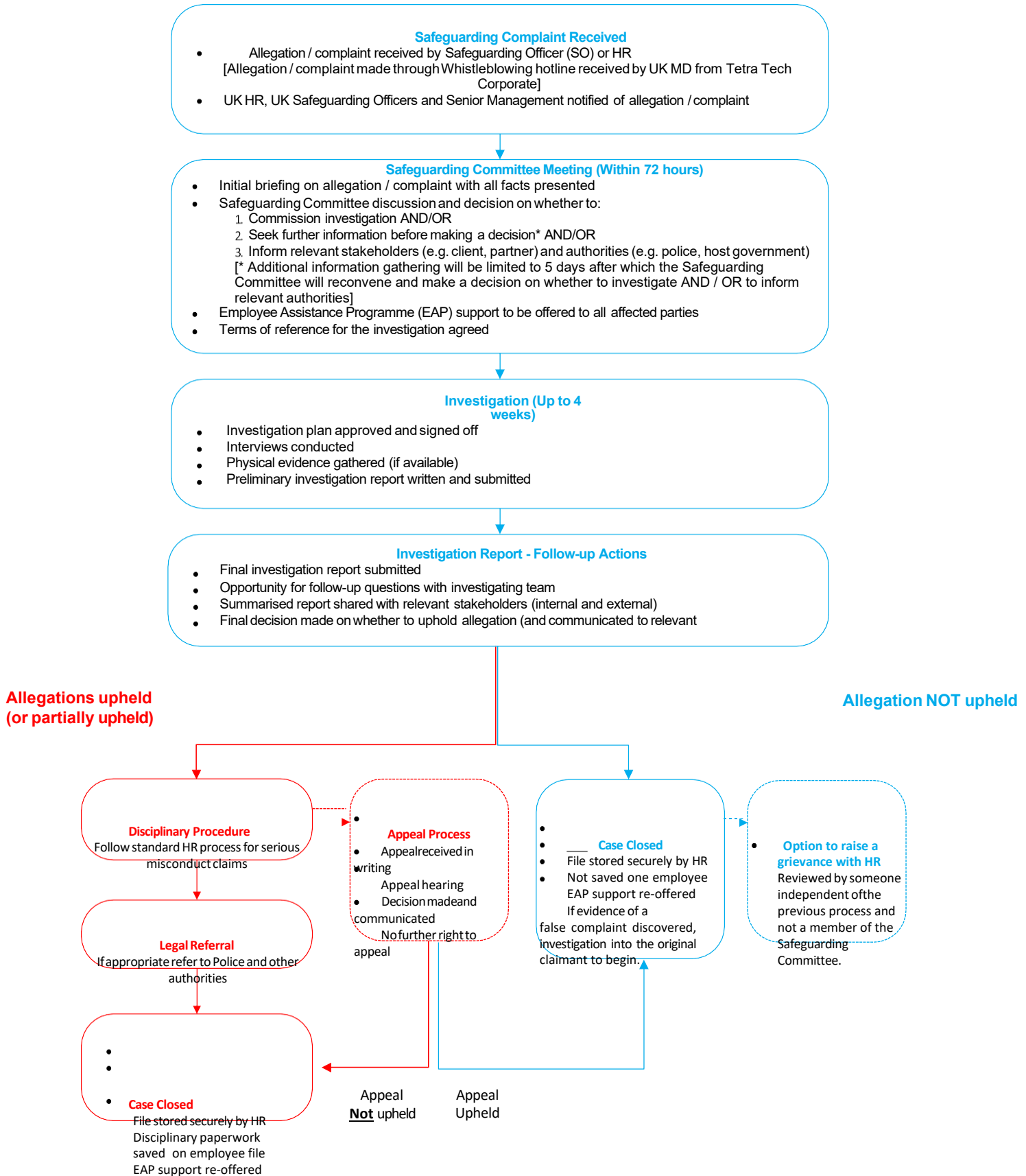
Annex 1: Examples of unacceptable behaviour

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

Tetra Tech staff, consultants, partners and subcontractors may not:

- Engage in any form of abuse or sexual exploitation.
- Engage in sexual activity with children (defined as persons under the age of 18) regardless of the age of majority, or age of consent, locally. Mistaken belief in the age of a child is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of aid/humanitarian assistance that is due to beneficiaries or resources or benefits that employees have power to give
- Hide concerns or suspicions regarding sexual abuse or exploitation by a staff member or anyone working on behalf of Tetra Tech.
- Hit or otherwise physically assault or physically abuse anyone.
- Develop relationships with children or adults at risk which could in any way be deemed exploitative or abusive.
- Place a child or at risk adult at risk of abuse.
- Use language, make suggestions or offer advice which is inappropriate or abusive
- Behave physically in a manner which is inappropriate or sexually provocative
- Do things for children or vulnerable adults 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 at risk adults, or otherwise perpetrate any form of emotional abuse
- 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: Reporting process



Annex 3: Vetting procedures

Category	Owner	UK DBS Checks	Criminal records	References	MDS ⁱ
UK-based employee ⁱⁱ	HR	Yes	NA	Yes	Yes
EU-based employee ⁱⁱⁱ	HR	No	Yes	Yes	Yes (excluding Poland)
Overseas-based employee (non-project employee) ^{iv}	HR	NA	Yes	Yes	Yes
Project employees	PM	NA	Yes	Yes	Yes
Third party consultants ^v	RMT	NA	Yes (WCR ^{vi})	Yes	No
Firms / Partners	RMT ^{vii}	NA	Yes (WCR ^{vi})	Yes	No

The HR team can assist with facilitating the criminal records checks and MDS vetting. Project Management are responsible for ensuring all employees contracted onto their projects follow the procedures set above. There will always be exceptions so do speak to HR for guidance.

I. National and international criminal record checks

Tetra Tech works with a global background checking company which can:

- Provide a Disclosure and Barring Service (DBS) check, which is a record of a person's criminal convictions and cautions in the UK.
- Check staff records against an international criminal record database. Should this database not be available in the named country, the locally provided police report certifying no criminal record will be required.
- Provide an employment history reference background checking service.

II. Misconduct Disclosure Scheme

In 2020 Tetra Tech signed up to the Misconduct Disclosure Scheme (MDS). The aim of the MDS is to address the specific problem of known sexual abusers moving within and between different humanitarian and development agencies. The Scheme consists of three main commitments:

- A commitment to systematically check with previous employers about any sexual exploitation and abuse issues relating to potential new hires
- A commitment to respond systematically to such checks from others.
- A commitment to report on an annual basis the number of checks and responses received.

ⁱ Misconduct Disclosure Scheme

ⁱⁱ UK-based employee – An employee based in the UK is issued with either permanent or fixed-term contract.

ⁱⁱⁱ EU-based employee – An employee based in the EU is issued with either a permanent or fixed-term contract that is compliant with the country in which they live and work. MDS checks are not permitted in Poland.

^{iv} Overseas employee (non-project) - In countries where projects are being delivered, the employee is issued with either an open-ended or fixed-term, locally compliant employment contract.

^v Third party consultants – These are independent contractors with long term or short-term agreements working on our projects

^{vi} World Compliance Report (Lexis Nexis)

^{vii} Risk Management Team

Annex 4: Programme Management Safeguarding Checklist

The Safeguarding checklist should be used by the Programme Manager at the beginning of the programme to ensure compliance with the Safeguarding Policy. The Programme Manager should ensure that each activity/ operating standard has an allocated responsible staff member (e.g. Programme Manager, Safeguarding Focal Point, Grant Officer, HR Manager, Risk Manager). The form should be reviewed regularly to ensure that all standards are maintained.

Project name:

Programme Manager:

Safeguarding Focal Point:

Activity or operating standard	Responsible	RAG rating	Progress
Is the Safeguarding Policy included as an annex to all contracts?	<i>Example: Programme Manager</i>		
Has safeguarding been included in all partner assessments (due diligence, organisational capacity assessments etc.) and their capacity building plans?	<i>Example: Grant Officer</i>		
Do all offices have a Safeguarding Reporting Poster? Is the reporting procedure readily accessible by all staff?	<i>Example: Programme Manager / Safeguarding Focal Point</i>		
Has safeguarding been incorporated into relevant programme implementation and research tools, such as risk assessments, monitoring checklist, workplan and budget, programme learning review tools? If so, how?	<i>Example: Programme Manager</i>		
Have you undertaken a safeguarding risk assessment and identified risks and mitigation measures which are specific to your programme and the local context?	<i>Example: Programme Manager</i>		
Have you completed all the required reference checks for subcontractors, consultants and project staff including national police / criminal record checks?	<i>Example: Programme Manager Safeguarding Focal Point</i>		
Who is the dedicated project	<i>Example: Programme</i>		

Safeguarding Focal Point?	<i>Manager</i>		
Does the project have an allocated staff member who will deliver safeguarding training to partners and staff?	<i>Example: Programme Manager</i>		
Have all staff members, subcontractors and consultants successfully completed national police checks and reference checks?	<i>Example: Programme Manager/ HR Manager</i>		
Are operational suppliers aware of our safeguarding policy? Do they have a reporting mechanism for beneficiaries, staff and others to report safeguarding concerns? Do they have a safeguarding policy which includes training and/or awareness raising?	<i>Example: Programme Manager</i>		