



**Ecorys UK  
Code of Business Ethics  
and Conduct**

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Ecorys UK Code of Business Ethics and Conduct

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## **Code of Business Ethics and Conduct**

Ecorys attaches great importance to its reputation for conducting its business with integrity and with respect to the interests of those our activities can affect. This reputation is an asset, just as real as our people and brands.

We aim to run a profitable business and that means investing for growth and balancing short term and long term interests. It also means caring about our customers, employees, shareholders and suppliers, and the communities in which we conduct our operations. In the course of meeting our business objectives, we consider it essential that all employees understand and comply with our values and therefore share the Ecorys way of doing things.

The general principles of the “Ecorys way” are contained in this Code.

This Code of Business Ethics and Conduct is a core Ecorys statement and we commend it to all our stakeholders.

### **1. Standard of conduct**

Ecorys conducts its business with honesty and integrity and with respect for the interests of our stakeholders.

### **2. Regulatory & legal compliance**

Ecorys companies are required to comply with the laws and regulations of the countries in which they operate.

### **3. Employees**

Ecorys companies are required to recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. Ecorys is committed to provide safe and healthy working conditions for its employees worldwide. Ecorys believes it is essential to maintain good communications with employees, normally through company’s communication channels and tools, and consultation procedures.

### **4. Conflicts of Interest**

Ecorys expects its employees to avoid personal activities and financial interests which could conflict with their jobs and responsibilities. A conflict of interest is any situation in which an employee’s personal interests, or interests that they owe to another organisation, may (or may appear to) influence or affect the employee’s decision-making for Ecorys.

Such conflicts can arise from personal relationships within or outside the workplace or through activities or interests outside the workplace, such as, but not limited to, political engagement, employments, directorships, shareholdings, voluntary work or association memberships.

The purpose of this policy is to protect the integrity of Ecorys’ decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of our employees.

Employees should not interpret our conflict of interest procedures as preventing or discouraging their being involved in leisure-time, community, political or other activities, or holding investments in other businesses. However, where these activities, interests or relationships give or could give rise to, or could be seen as giving rise to, a conflict of interest it is important that they are properly considered and, where appropriate, declared and registered.

Many conflicts can be avoided altogether, but where this is not possible, careful treatment is required, including transparency, declaration, appropriate authorisation, and possibly changed management of

the decision in question.

This policy requires employees to:

- Avoid conflicts of interest where possible.
- If this is not possible, employees should identify and disclose any conflicts of interest. Employees must declare to their Line Manager any matter that potentially could or be perceived to influence their decisions or actions for Ecorys, giving your Line Manager all the relevant facts in writing.
- Employees must register their conflicts of interest in the Ecorys Register of Interests maintained by the Ecorys Compliance Officer and keep this registration up to date.
- Whether employees have registered any potential conflict of interests or not they must always declare them and be prepared to withdraw from any decision-making capable of being impacted by their conflict of interest, unless their Line Manager agrees in writing otherwise. **Promotional Activities**

Ecorys neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests. Ecorys companies and employees are encouraged to promote and defend their legitimate business interests. In doing so they may either directly, or through bodies such as trade associations, raise questions and discuss particular government actions or decisions. Where their experience can be useful, they are encouraged to cooperate with governments, individuals, agencies and other organisations in the development of proposed legislation and other regulations which may affect such legitimate interests.

Ecorys companies and employees are also encouraged to respond to requests from governments and other agencies for information, observations or opinion on issues relevant to business and the community in which we operate.

## **5. Quality**

Ecorys is committed to provide products which consistently offer value in terms of price and quality.

## **6. Environmental Issues**

Ecorys is committed to run its business in an environmentally sound and sustainable manner. Our aim is to ensure that our processes and products have the minimum adverse environmental impact commensurate with the legitimate needs of the business.

## **7. Competition**

Ecorys believes in vigorous yet fair competition and supports the development of appropriate competition laws. Employees receive guidance to ensure that they understand such laws and do not transgress them.

## **8. Reliability of Financial Reporting**

Ecorys' accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

## **9. Bribery**

Ecorys does not give or receive bribes in order to retain or bestow business or financial advantages. Ecorys employees are instructed that any demand for or offer of such bribes must be immediately rejected and notified. The Ecorys UK Anti-Corruption and Bribery Policy is attached in Annex A.

## **10. Modern Slavery**

The Ecorys Group of Companies support the UK Modern Slavery Act 2015 in all parts of its business

services. We have a zero-tolerance approach to any form of modern slavery and human trafficking. Our Modern Slavery and Human Trafficking Policy is attached in Annex B.

### **11. Safeguarding Vulnerable People**

Ecorys is committed to ensuring that vulnerable people that we come into contact with during the course of our work are protected. Safeguarding is about protecting certain people who may be in vulnerable circumstances. A Vulnerable Person is an adult, young person or child who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect themselves against abuse, harm or exploitation. These people may be at risk of abuse or neglect due to the actions, or lack of action, of another person. The Ecorys UK Safeguarding Vulnerable People Policy is attached in Appendix C.

### **12. Application**

This Code applies to Ecorys companies and employees throughout the world. Where Ecorys participates in joint ventures, the application of these principles will be actively upheld; this will significantly influence the decision to enter into or to continue in any joint venture.

### **13. Compliance**

It is the responsibility of the Board of Management of Ecorys to ensure that the principles embodied in this Code are communicated to, and understood and observed by all employees. The Board of Management of Ecorys will not criticize management for any loss of business resulting from adherence to these principles. Equally, the Board of Management of Ecorys undertakes that no employee will suffer as a consequence of bringing to their attention, or that of senior management, a breach or suspected breach of these principles. The Ecorys UK Whistleblowing Policy (attached in Annex D) sets out the way in which employees and similar individuals may raise concerns and the management response to a concern raised in this manner.

## **ANNEX A: ANTI-CORRUPTION AND BRIBERY POLICY**

### **Policy**

It is the policy of Ecorys UK Limited (the “Company”) to conduct all of our business in an honest and ethical manner. We do not tolerate any bribery or corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; together with implementing and enforcing effective systems to counteract bribery.

This policy covers bribes, gifts and hospitality, facilitation payments and “kick-backs” and political donations.

This policy is designed to uphold the requirements of United Kingdom (UK) legislation, principally The Bribery Act 2010 which came in to force in July 2011.

The Company will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

1. set out our responsibilities and of those working for us, in observing and upholding our position on bribery and corruption
2. provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

Under UK law, bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

We have identified that the following are particular risks for our business:

- Country risks in relation to IDD and PMC operations
- Business opportunity risk due to the number of experts, associates and contractors that ECUK works with
- Business partnership risks in respect of partnership arrangements including consortia and joint ventures

In this policy, third party means any individual or organisation you come into contact with during the course of your work for Ecorys UK, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

**Application**

This policy applies to:

- All directors, officers and employees in the Company, whether permanent, fixed-term or temporary (collectively referred to as “employees” in this policy)
- Consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “workers” in this policy)

**Company responsibility**

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Board of Directors have delegated to the Finance Director and Company Secretary, acting as a “Compliance Officer”, the primary and day-to-day responsibility for this policy, its implementation and monitoring its use and effectiveness in dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are appropriately train on the policy.

**Your responsibility to comply**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or whom are under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Compliance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

**Failure to comply**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with workers or sub-contractors if they breach this policy and compliance with this policy is in our standard terms and conditions for contractual relationships.

## **Bribery**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Under no circumstance will the Company offer or accept bribes.

## **Gifts and hospitality**

### ***Acceptable***

This policy does not prohibit normal and appropriate gifts and/or hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if all of the following requirements are met:

- (a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- (b) It complies with local law
- (c) It is proportionate to the business relationship
- (d) It is appropriate in the circumstances. For example , in the UK it is customary for small gifts to be given at Christmas time
- (e) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time
- (f) It is given openly, not secretly
- (g) Recorded in the gift register held by the Compliance Officer

Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of The Compliance Officer.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. If in any doubt as to the appropriateness of a gift or hospitality, the matter should be referred to the Compliance officer before acceptance.

### ***Not acceptable***

It is not acceptable for you (or someone on your behalf) to:

- (a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given

- (b) Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure; gifts to foreign officials are entirely prohibited within this policy
- (c) Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- (d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- (e) Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy
- (f) Engage in any activity that might lead to a breach of this policy

### **Facilitation payments and "kick-backs"**

The Company does not make, and will not accept, facilitation payments or "kick-backs" of any kind:

- Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions in which we operate.
- Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt/invoice which details the reason for the payment.

If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Officer.

### **Political donations**

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Compliance Officer.

### **Record Keeping**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments. This applies to all project records and particularly to bank accounts operated in the name of projects overseas.

### **How to raise a concern**

It is important that you tell the compliance officer as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future or believe that you are a victim of another form of unlawful activity.

Concerns should be reported by following the procedure set out in our Whistleblowing policy which allows for direct reporting of concerns to the Compliance Officer – Finance director and Company Secretary. A copy of our Whistleblowing Policy can be found on the intranet.

You are encouraged to raise concerns with the Compliance Officer about any issue or suspicion of malpractice at the earliest possible stage.

If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Compliance Officer.

If the Compliance Officer is not contactable, then the concern should be raised with the Managing Director or another member of the Company's Board of Directors. Timeliness can be essential in this area and prompt reporting should be considered of the utmost importance.

If a concern might involve the Compliance Officer, the concern should be reported to the Managing Director.

If the concern might involve the Managing Director, the concern should be reported to the Ecorys Group Board of Management.

### **Protection**

Employees and Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. 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 no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure. Either Employees or Workers may also report directly to the Managing Director.

### **Training and communication**

Training on this policy forms part of the induction process for all new employees. All existing employees will receive relevant training on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### **Monitoring and review**

The Compliance Officer will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Internal control systems and procedures will be subject to regular review to provide assurance that they are effective in countering bribery and corruption.

All Employees and Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected breach or wrongdoing.

This policy, which does not form part of any Employee's contract of employment and may be amended at any time, must be adhered to by all Workers at all times.

### **Internal reporting to Ecorys Group**

The reporting of any anti-corruption or bribery matter to Ecorys Group Board of Management and the Ecorys Group Supervisory Board is a matter for the Compliance Officer working closely with the Managing Director and Board of Directors; in compliance with the Ecorys Group Governance Manual and requirements.

### **External reporting**

The reporting of any anti-corruption or bribery matter outside of the Company or Ecorys Group is for the Compliance officer working closely with the Managing Director and Board of Directors to determine.

## **ANNEX B: MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

The Ecorys Group of Companies support the Modern Slavery Act 2015 in all parts of its business services. We have a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to ensuring that modern slavery and human trafficking do not take place within our business or supply chain.

### **Policy Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

Ecorys UK will:

- Support our staff to be aware of the risks of human trafficking and modern slavery and to act appropriately when any such risk is detected.
- Conduct due diligence on business partners within our supplier chain.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the appropriate authorities.
- Encourage workers to report cases of third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and contractors to report such exploitation which may be occurring within their communities. Points of reference include Line Managers, the Group Compliance Officer and avenues outlined in the Ecorys Whistleblowing Policy.
- Ecorys accepts that job finding fees are a business cost and will not allow these to be paid by job applicants.
- As appropriate, designate managers to attend training on the prevention of labour exploitation who will have responsibility for developing and operating company procedures.

### **Scope of this Policy**

This policy applies to all Ecorys Group companies, employees and contractors.

### **Responsibility for Implementation**

The Board of Management of Ecorys Group overall responsibility for this policy. The Managing Director of Ecorys UK has primary responsibility for the implementation of this policy.

## **APPENDIX C: SAFEGUARDING VULNERABLE PEOPLE POLICY**

Ecorys UK is committed to ensuring that vulnerable people that we come into contact with during the course of our work are protected. Safeguarding is about protecting certain people who may be in vulnerable circumstances. A Vulnerable Person is an adult, young person or child who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect themselves against abuse, harm or exploitation. These people may be at risk of abuse or neglect due to the actions, or lack of action, of another person. The aim of this policy is clarify the Ecorys UK approach towards the safeguarding of Vulnerable Persons. We intend it to ensure a common understanding of safeguarding issues, ensure we embed good practice across the diverse and complex areas in which we operate and also enhance accountability in this crucial aspect of our work.

It is the responsibility of every Ecorys UK employee to be familiar with this policy and comply with its terms.

Ecorys UK requires all organisations and individuals working with, or on behalf of Ecorys UK whether in the UK or overseas, as partners, or sub-contractors to be familiar with and comply with this policy.

This policy constitutes Ecorys UK's global policy. Whilst it is recognised that local legislation may vary from country to country, this policy identifies our minimum standards, is based on UK legislation, and may exceed the requirements of local legislation.

Ecorys UK always aims to work in ways which are culturally sensitive and that respect the diverse nature of the people and cultures we work with and in.

Any breach of this policy will be treated as a disciplinary matter, which will be investigated thoroughly and may result in termination of employment or contract, and reporting to the police, relevant regulatory authority or other body as necessary.

### **Introduction**

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. Ecorys UK is committed to protecting people who may be unable to protect themselves against significant harm or exploitation.

Ecorys UK will take all appropriate steps to ensure that all employees are provided with support to deal with potentially challenging concerns and issues with regards to safeguarding. Ecorys will undertake appropriate criminal record checks to prevent unsuitable employees working with Vulnerable Persons.

All employees, whatever their position, have responsibility for its effective implementation. This policy applies to all employees of Ecorys, who should familiarise themselves with its provisions.

## **Purpose**

The objectives of this policy are to:

- Ensure that all employees that have contact with Vulnerable Person during the course of their work understand their duties and responsibilities
- Ensure consistent approach to training, codes of practice and reporting concerns
- Assure Vulnerable Persons and their carers that all possible measures are in place to support them.

## **Employment Procedures**

### **DBS Checks**

Where required by the particular circumstances of the work, Ecorys UK will undertake relevant Enhanced Disclosure Barring Service (DBS) Checks to ensure that only those employees with the correct clearance have contact with Vulnerable Persons, whether in the UK or worldwide. Ecorys UK will also reserve the right to ask subcontractors and partners, or anyone operating on our behalf to undertake DBS Checks, as required, in line with this policy.

### **Training**

All Ecorys UK employees who come into contact with Vulnerable Person will have training in handling a disclosure, reporting an allegation, confidentiality, code of practice and code of behaviour. These will include online training tools and induction processes. Existing employees will be made aware of the policy, procedures and guidance. All employees who have contact with Vulnerable Person must ensure that they familiarise themselves with the Code of Practice and guidance notes at the end of this policy (Appendix 1).

The Designated Safeguarding Officer, (who can be contacted through the Business Directors) will be able to offer advice on request.

Training is updated at the minimum of every three years for all employees who may come into contact with Vulnerable Persons as part of their day to day work.

### **Good Practice in Research**

No research involving, or otherwise engaging, Vulnerable Persons may be carried out without the approval of the Project Director.

Business Unit Managing Directors are responsible for ensuring that satisfactory control measures are in place to protect Vulnerable Persons.

## **Definitions and Indicators of Abuse**

Abuse is any behaviour towards a person that deliberately or unknowingly causes him/her harm, endangers life or violates their rights. Abuse can include neglect, physical abuse, sexual abuse, sexual exploitation, emotional abuse and inappropriate responses of carers. Employees working with Vulnerable Persons should ensure they are aware of signs of abuse and should report any suspicions to

the Business Unit Managing Director. The following list are common signs of abuse of a Vulnerable Person:

- Constant hunger, stealing, scavenging and/or hoarding food; eating disorders
- Frequent tiredness or listlessness, poor concentration
- Frequently dirty, unkempt or poorly or inappropriately clad for the weather;
- Illnesses or injuries that are left untreated;
- The Vulnerable Person is regularly not collected or received from places they are attending; or is left at home alone or with inappropriate carers
- Multiple marks to the skin, e.g. teeth marks, burns, bruises
- An injury that is not consistent with the account given
- Fear of medical help or going home;
- Violence or aggression towards others or isolation from peers
- Having a relationship of concern with a controlling person
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology;
- Having unexplained contact with hotels, taxi companies.
- Entering and/or leaving vehicles driven by unknown people;
- Significant over-reaction to mistakes;
- Delayed physical, mental or emotional development or inappropriate emotional responses
- Sudden speech or sensory disorders;
- Neurotic behaviour: rocking, banging head, regression, tics, twitches, self-harming
- Drug or solvent abuse;
- Running away; unexplained absences

When working with Vulnerable Persons with disabilities, employees should be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an Vulnerable Person such as the shin, might be of concern on a non-mobile Vulnerable Person;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn an Vulnerable Person's means of communication;
- Ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting;
- Misappropriation of a Vulnerable Person's finances.

## **Abuse reporting procedure**

All employees working with Vulnerable Persons have to be alert to the possibilities of abuse and any concerns should be reported to the Designated Safeguarding Officer (DSO), who will decide what further action should be taken. It is the duty of employees to inform the Designated Safeguarding Officer only and not to investigate.

Any employee who suspects that a Vulnerable Person has been, or is at risk of being abused, or has had a disclosure of abuse made to them must make a note and follow Ecorys UK reporting procedures as detailed below:

1. Contact DSO immediately by phone to advise them of the allegation or incident
2. Complete the 'Safeguarding Incident Reporting Form' (Appendix 2) and pass to the Designated Safeguarding Officer within 24 hours of the allegation or incident.
3. Do not take any further action or discuss the matter further with anyone else unless advised otherwise by the DSO. The DSO will, if appropriate consult with Social Service, Police or local law enforcement, and if necessary make a referral.

A written record will be kept of all discussions, actions, procedures carried out, including outcome of any investigation. While investigations are taking place no part of the incident and or details should be discussed except with the DSO and if appropriate with the relevant outside agencies, if required.

The DSO will keep employees involved in the incident suitably informed of any referral and its outcomes.

## **Role of the Designated Safeguarding Officer**

The role of the Designated Safeguarding Officer (DSO) is to receive and record information about allegations or suspicions of abuse, reported by employees who have safeguarding concerns.

The DSO will assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate. The DSO will consult initially with the statutory safeguarding agencies to discuss their concerns and will make a formal referral to a statutory Vulnerable Person safeguarding agency, the police or local law enforcement agency.

## **Procedures when abuse is suspected involving an employee of Ecorys UK**

If an allegation of abuse is made, or abuse suggested, against an Ecorys UK employee it should be referred immediately to the HR Manager and the Designated Safeguarding Officer, who will gain relevant information and start an investigation. This will follow the Ecorys Disciplinary Policy for the internal investigation and may require suspension whilst the investigation takes place.

The DSO will report will where there is clear actual or circumstantial evidence to support the allegation, make an immediate referral, and will liaise with external agencies. The Police, local law enforcement or Social Services may investigate the allegations in conjunction with the Company.

## **Storage of records**

Records will be electronically stored by HR on Ecorys UK servers, accessible only by designated persons, in line with data protection laws.

Information relating to disclosures will be passed, as appropriate, to the Social Services and/or Police, local law enforcement or other relevant safeguarding agency only.

Every effort will be made to ensure confidentiality is maintained, where information is handled and disseminated on a strict need to know basis.

## Appendix 1 - Code of Practice – Safeguarding Vulnerable Persons

We expect all employees and anyone working on behalf of Ecorys UK to follow this Code of Practice when working with Vulnerable Persons. It is intended to support employees in understanding what they should do if they have concerns.

Our Code of Practice applies worldwide. If there are unavoidable legal or other circumstances that make applying it difficult in a particular location, the Programme Director should speak to the Designated Safeguarding Officer or Ecorys UK Managing Director or a nominated senior manager.

You should:

- Operate within the guidance offered by this Code and within the Vulnerable Person Safeguarding Policy and procedures.
- Treat all people with respect and respect their right to personal privacy
- Be aware that contact with a Vulnerable Person via email and/or other electronic media (such as Facebook, or Twitter), may be misinterpreted and therefore is strongly discouraged
- Exercise caution when discussing sensitive issues with an Vulnerable Person and end the discussion if they become uncomfortable or embarrassed
- Not initiate any physical contact with a Vulnerable Person.
- Challenge all unacceptable behaviour and report all allegations or suspicions of abuse
- Remember that all employees of Ecorys UK serve as role models and must act in a responsible manner.

You should not:

- Spend excessive time alone with a Vulnerable Person.
- Give out your personal contact details or home address
- Take Vulnerable Person alone in a car journey
- Take Vulnerable Person to your home
- Allow or engage in any inappropriate touching, in any way
- Physically restrain a Vulnerable Person unless the restraint is to prevent injury to themselves or others.
- Let allegations, over familiar or sexually suggestive comments or approaches made by an Vulnerable Person go unchallenged or unrecorded
- Give or accept any gift of any kind. Offers of gifts should be reported to the Designated Safeguarding Officer
- Take photographs, videos or other images of the Vulnerable Person without express permission

DO	DON'T
Stay Calm	Panic
Recognise your own feelings, but keep them to yourself	Delay
Use language that the Vulnerable Person can understand	Express shock or embarrassment or offer opinions about what you are told
Reassure the Vulnerable Person that: <ul style="list-style-type: none"> <li>• They are doing the right thing in telling you</li> <li>• They are not to blame</li> <li>• You believe they are telling the truth</li> </ul>	Probe for more information or use leading questions

Try to show you accept what they are saying, and that you take their allegations seriously and communicate they have a right to be safe and protected.	Make the Vulnerable Person repeat the story
Listen carefully and check you have understood what the Vulnerable Person has told you.	Promise confidentiality – as information regarding abuse of a Vulnerable Person has to be reported.
Write down what you have been told using the exact words, if possible. If this is not possible keep a set of notes and record as soon as possible	
Explain what you will do next, and who you will report it to. Do this in a way that is appropriate to the individual's emotional state.	
Report the event to your Designated Safeguarding Officer, and complete the Incident Reporting Form.	
Seek advice and support for yourself.	

## Appendix 2 - Vulnerable Persons Safeguarding Incident Reporting Form

This form is used for reporting both suspicions and disclosures of possible abuse, therefore not all sections may be appropriate. Please complete with as much information as possible, using verbatim reports from people involved where possible. This information will be treated in the strictest confidence.

Do not discuss this with friends or colleagues. Speak with the Designated Safeguarding urgently who will then initiate the appropriate action.

About you, the reporter	
Your name:	
Your job role:	
Your telephone number and email address:	
Are you reporting the concern on behalf of someone else?	
If yes to above, what is their name and their position?	
What involvement have you had? (e.g. contact with family/ other professionals etc.)	

About the Vulnerable Person	
Name:	
Age and date of birth:	
Gender:	
Address, telephone and email contact details:	
Housing tenure (social housing/ private rented/ owner occupier):	
Ethnicity:	
Disabilities or other special factors:	

About the Vulnerable Person's family/ support network	
Who is the person's next of kin?	
Address, telephone and email contact details:	
Names of other people living at the address or significantly involved:	

About the concern	
What has happened/ what are your concerns? (Please give full details, using verbatim reporting where possible: this record should be immediate and should include the time, date, location of the conversation, and anyone else who was present)	
Have you or anyone else involved spoken to the person or with their parents/ family/ others involved? If so, what was discussed? (record this verbatim where possible)	
Dates and times of significant events:	

About the alleged abuser, if known	
Name:	
Job role:	
Address, telephone and email contact details:	

**About other agencies involved**

Are you aware of any other services or professionals who are involved with the person?	
Name of agency and professional:	
Address, telephone and email contact details:	
Details of involvement and any advice you have received with dates:	

**For Designated Safeguarding Officer use only**

DSO name:	
Date, time, venue/ method of initial staff report regarding suspicions, concerns or disclosure relating to safeguarding; and who was present:	
Date, time and venue of Incident Reporting Form handover; and who was present:	
DSO actions: E.g. no further action, referred to police	

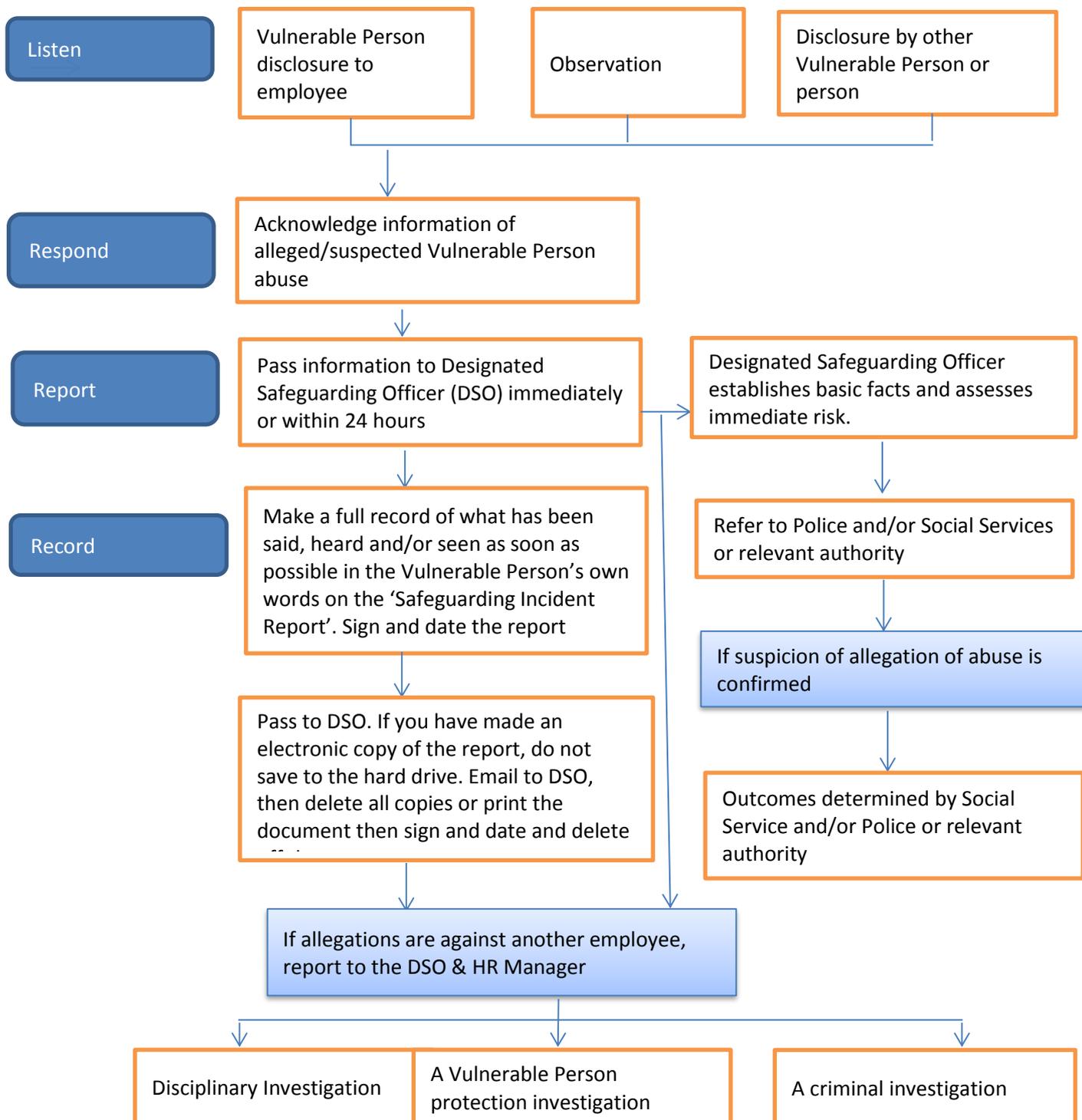
Employees Signature \_\_\_\_\_

Date \_\_\_\_\_

DSO Signature \_\_\_\_\_

Date \_\_\_\_\_

### Appendix 3 - Procedure for responding to allegations of abuse of a Vulnerable Person



## **ANNEX D: WHISTLEBLOWING POLICY**

### **Application**

This policy applies to all employees of Ecorys UK (the Company); together with other individuals performing functions in relation to the Company, such as agency workers and contractors.

This policy sets out the way in which employees and similar individuals may raise concerns and the management response to a concern raised in this manner.

### **Policy requirement**

**Under the protection of this Whistleblowing policy; any employee or similar individual (the “Whistleblower”), who has reasonable grounds to suspect irregularity is obliged to bring this to the attention of a member of the senior management of the Company.**

### **Senior management and escalation**

The Whistleblower would typically bring the matter to the attention of a Company Director or a member of the senior management such as: the Human Resources Manager, The Financial Controller or the IT Manager.

Any matter brought to the attention of a Company Director or member of senior management must be notified to the Finance Director and Company Secretary within 24 hours.

If the matter concerns a Company Director or member of senior management then it should be notified to the Managing Director and the Finance Director. If the matter concerns the Managing Director and/or the Finance Director; the matter should be notified to a member of the Ecorys Group Board of Management.

### **Background**

It is important to the business that any fraud, misconduct or wrongdoing by officers or employees of the Company is reported and properly addressed.

All employees and similar individuals should feel confident to raise concerns that they may have about irregularity of others in the business. If they are not sure whether to raise a concern, he/she should discuss the matter as if it is appropriate to raise a concern under this policy.

## **Legal requirement**

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters. These are called “qualifying disclosures.”

A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that one of the following is being, has been, or is likely to be, committed:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.

The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

An employee who makes such a qualifying disclosure automatically gains a level of protection that includes the right not to be dismissed, or subjected to victimisation, because he/she has made the disclosure.

## **Principles**

Ecorys UK Limited will apply the following underlying principles to this policy and the appropriate response:

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff should be mindful of the requirements above; broadly categorised as illegal or unethical conduct and report anything of that nature of which they become aware.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the matter.
- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern.
- Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence.

- If misconduct is discovered as a result of any investigation under this procedure the Company's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- If an employee or similar individual decides to report a matter without recourse to the internal procedure in the Whistleblowing policy, this is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to the Managing Director and/or Finance Director.

## **Procedure**

This procedure for whistleblowing disclosure:

1. The Whistleblower will report the matter to a Company Director or a member of the senior management such as; the Human Resources Manager, The Financial Controller or the IT Manager (the "Whistleblowing Manager").
2. The Whistleblowing Manager will record the initial details, including the date of receipt of the report, in writing; and report this to the Managing Director and Finance Director.
3. The Company will identify an appropriately senior manager to investigate the matter (The "Investigating Manager" who may be the Whistleblowing Manager).
4. The investigation may involve the Whistleblower and/or other employees or similar individuals being interviewed. The investigation will follow the grievance investigation policy principles and time frame of the Company. Given the nature of whistleblowing, the investigation will be conducted as efficiently and effectively as is possible to mitigate any potential risk going forward to either the Whistleblower or the Company.
5. The Investigating Manager will report to the Managing Director and Finance Director on the initial matter, the investigation performed and the outcome or recommendation. The matter will be reported to the Company's Board of Directors and, if appropriate, a special Board Meeting convened.
6. Based upon the accepted outcome of the investigation, appropriate and/or necessary action will be determined by the Managing Director and Finance Director and approved by the Board of Directors.
  - a. Action may include reporting the matter to an appropriate government department or regulatory agency or to a client if the matter is contract specific.

- b. If internal disciplinary action is required, this will follow the disciplinary procedures of the Company. The matter will be reported to the Human Resources Department which will start the disciplinary procedure.
7. If the Whistleblower is not satisfied that the Company has complied with this policy and taken the appropriate actions, the Whistleblower can appeal to outcome and action to the Ecorys Group Board of Management.

### **Internal reporting to Ecorys Group**

The reporting of any anti-corruption or bribery matter to Ecorys Group Board of Management and the Ecorys Group Supervisory Board is a matter for the Board of Directors in compliance with the Ecorys Group Governance Manual and requirements.

### **External reporting**

Upon a whistleblowing matter being reported, it is for the Managing Director and Finance Director to make an initial assessment as to whether external reporting of the matter is required immediately.

Upon the conclusion to the investigation, the Managing Director and Finance Director will again determine whether external reporting is required. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs
- The Financial Services Authority
- The Office of Fair Trading
- The Health and Safety Executive
- The Environment Agency