

## ID SAFEGUARD POLICY

### Our corporate responsibility

Responsibility for human rights is a global standard for all business independent of a state's ability to fulfil their own human rights obligations. This is articulated in the *UN Guiding Principles on Business and Human Rights*. As an international corporation engaged by our clients to deliver projects in the emerging markets, Cardno has a particular responsibility to operate ethically and protect the health, safety, and well-being of everyone who is encompassed within the scope of our business. This includes our staff, beneficiaries, and the communities we work in. We are particularly mindful of the impact international projects may have on children, women, and vulnerable adults.

### Our commitment

Cardno is committed to taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, harassment, and environmental degradation from occurring directly or indirectly, as a result of our activities. We condemn fraud, corruption, and money laundering. Where breaches occur Cardno is committed to investigate, remedy, and learn.

### Operationalisation

To give effect to this policy we have a number of operational procedures and codes of conduct that all staff, contractors, and grantees must commit to by way of acknowledgment, training, and through contractual obligations (see [Annex A](#)). This doctrine is codified on our Quality Management System which provides the platform for accessing, improving, and building our knowledge of international project delivery.

### What is required?

All Cardno staff, sub-contractors, and grantees must ensure they are aware of their responsibilities and obligations with respect to safeguards. This applies to both the behaviour of individual personnel and the design and implantation of Cardno activities. Our policy requires that all Cardno staff, sub-contractors, and grantees:

- > Understand our universal safeguarding policy and related procedures;
- > Understand any client specific requirements;
- > Undertake safeguards training during on-boarding and annually thereafter; and/or receive briefings in relation to safeguards; partner organisations to ensure personnel working on Cardno activity do the same;
- > Comply with behaviour protocols articulated in Cardno's [Annex A: List of Cardno safeguard procedures and codes](#);
- > Appropriately use social media and technology as outlined in Cardno's IT policy; partner organisation to have similar controls;
- > Ensure compliance with regulations relating to tax, migration, and labour hire and ethical treatment of staff, including domestic staff and staff of service providers;
- > Comply with modern day slavery obligations in the jurisdictions we operate; this includes prohibition against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude; our suppliers must do the same;
- > Report any concerns or suspicions of modern slavery and human trafficking in any parts of the business or supply chain; our suppliers must do the same;
- > Report incidents of suspected or actual exploitation, abuse, harassment or policy non-compliance;

- > Support those who raise a query and about an actual or suspected breach of policy;
- > Maintain confidentiality when reporting exploitation, abuse, harassment or policy non-compliance and ensure procedural fairness;
- > Assess safeguarding risks and impacts in all of our activities, taking particular care with risks relating to children, women, and vulnerable adults;
- > Ensure additional vetting is conducted during recruitment of staff and partners when working with children and vulnerable adults;
- > Ensure appropriate and legal use of child imagery;
- > Ensure individuals who report a concern, in good faith, are not subject to retaliation or adverse employment consequences;
- > Ensure beneficiaries and communities are aware of their safeguarding rights and obligations and have access to reporting mechanisms;
- > Design and implement client activities in a way that protects people from the risk of harm;
- > Conduct regular project and activity level risk assessments;
- > Support investigations into any harm caused or a breach of any Cardno safeguard policy;
- > Comply with Cardno's fraud, anti-bribery, and money laundering policy.
- > Appoint safeguard focal points to assist with dissemination of this policy and as a point of contact to receive reports and support victims;
- > Engage with clients and industry on best practices, adequate procedures, and lessons in safeguards;
- > Ensure commercial and technical proposals include appropriate resources to manage safeguard risks and implement [Annex A](#) procedures.
- > Include safeguarding requirements in our procurement process and in agreements with downstream partners;
- > Ensure due diligence is completed before entering into any arrangement with a sub-contractor, grantee, supplier, or partner.
- > Support our downstream partners meet Cardno's safeguarding requirements through capacity building and other support as required;

### **Reporting & investigation**

All Cardno personnel, sub-contractors, and grantees are required to report any suspected or actual breaches of Cardno safeguard policies. There are a number of mechanisms to report including:

- > Local Safeguard Focal Point or Child Protection contact;
- > [Global Safeguarding Lead](#); or,
- > [Global Risk Manager](#).

**Reporting must be confidential and survivor centred. However, the person who receives a report may have a duty to disclose to certain persons in line with any legal obligations**

Other reporting mechanisms:

- > [Third Party anonymous whistle-blower hotline](#); or,
- > Employee's line manager; or,

- > Human Resources; or,
- > Team Leader/Chief of Party/Program Director; or
- > Relevant Regional/Country/Unit manager; or
- > Client or donor reporting mechanisms.

Each procedure provides guidance on what to report, what action to take if you receive a report, and the process for investigation and disclosure. Questions or feedback should be directed to the [Global Risk Manager](#).

Marian Boreland  
CEO Cardno International Development

**Document History and Version Control**

Version	Issue Date	Description	Owner	Approval
1	1 July 2020	New policy.	ID Risk Manager	ID CEO

**Attachment:**

**Annex A:** [List of Cardno ID safeguard procedures and codes.](#)