

# 2020

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## Safeguarding policy

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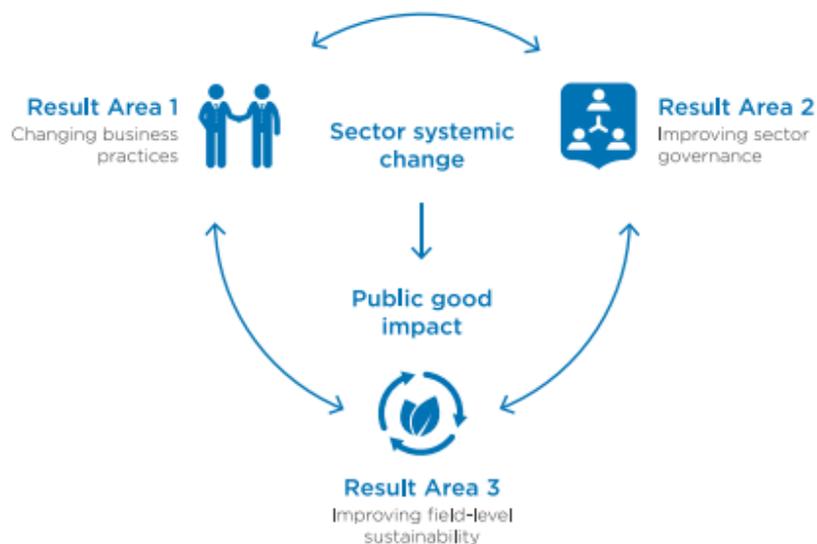
# 1.

## Commitment and purpose of safeguarding

### 1.1 Background

IDH aims for systemic change through changing business practices, improving sector governance, and improving field-level sustainability. We see these three areas as interlinked and are better addressed in parallel to create systemic change towards the Sustainable Development Goals (SDGs).

IDH focusses on five impact themes that help us and our partners to reach the SDGs: smallholder livelihoods, living wage and improved working conditions, mitigation of deforestation, responsible agrochemical management, and gender equality and empowerment.



IDH cooperates with numerous partners across the world. These can be companies, financial institutions, producer organisations, consultants, CSOs, governments and knowledge institutions. Together with these partners, IDH drives the joint design, co-funding and prototyping of new economically viable approaches to realize green and inclusive growth at scale in value chains and landscapes.

IDH is aware of the vulnerability of the individuals and communities directly affected by our work (“Beneficiaries”) and the importance of the behavior of our employees (including executive board), associates (“Staff”) and implementing partners and engaged consultants (“Partners”). This safeguarding policy sets standards and gives clear guidance on how to apply and implement the safeguarding policy throughout the organization and in relation to Partners.

## 1.2 What is safeguarding?

IDH’s safeguarding approach means taking all reasonable steps to identify and minimize the risk of harm caused by sexual exploitation<sup>1</sup>, abuse<sup>2</sup>, harassment<sup>3</sup> (“Harm”) to children<sup>4</sup> and vulnerable adults<sup>5</sup> arising from coming into contact with our Staff, Partners or our work. In addition, safeguarding means protecting our Staff itself from such Harm.

Safeguarding applies consistently across our Staff and Partners, as well as across our programs and projects where children and vulnerable adults are involved. It requires proactively identifying, preventing and guarding against risks of Harm and having mature, accountable and transparent mechanisms for reporting, response and learning when risks materialize.

## 1.3 IDH’s commitment to safeguarding

IDH upholds the following safeguarding commitments and responsibilities:

- a. We are committed to providing a safe environment for all Staff, Partners and Beneficiaries. IDH has zero tolerance for harm caused by sexual exploitation, abuse, harassment to children and vulnerable adults

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<sup>1</sup> Sexual exploitation is the actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

<sup>2</sup> Sexual abuse is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

<sup>3</sup> Sexual harassment is 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 person. Sexual harassment can be physical, psychological, verbal or non-verbal.

<sup>4</sup> A child is defined as someone under the age of 18 regardless of the age of majority/consent in country.

<sup>5</sup> Vulnerable adults are defined as those aged over 18 years who, due to their gender, ethnicity, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

- b. We will not knowingly recruit Staff or contract Partners in roles in which they pose a known risk to cause Harm to children or vulnerable adults
- c. All Staff has access to, and are familiar with, the safeguarding policy and will know their responsibilities within it
- d. All Staff receive training in relation to the safeguarding policy within appropriate timeframe of them joining the organization and regular mandatory refresher training afterwards
- e. The safeguarding policy is part of legally binding agreements with our Partners and compliance with the policy is a legal obligation
- f. Not acting in accordance with the safeguarding policy will lead to proportionate (disciplinary) actions, up to and including dismissal for Staff and termination of the agreement for Partners
- g. All Staff and Partners will have access to information about how to report concerns or allegations of Harm
- h. Concerns or allegations of Harm will always be taken seriously, will be investigated, addressed adequately and registered. No one will be victimized for reporting a concern or allegation

#### Staff and Partners' safeguarding responsibilities

IDH's Staff and Partners must not:

- a. cause Harm to colleagues, Partners, children, vulnerable adults and all others they come into contact with as part of IDH's work.

Additionally, IDH Staff and Partners are obliged to:

- b. Contribute to creating and maintaining an environment that prevents safeguarding issues within IDH and arising from our work and that promotes the implementation of the safeguarding policy;
- c. Report any concerns or suspicions regarding safeguarding issues by Staff or Partners. Please refer to chapter 3 to find out more about IDH's reporting mechanisms.

Although many situations that can cause harm have been covered, abovementioned list will never be an exhaustive list. The paramount principle is to consider the best interest of the persons you are dealing with. When in doubt, contact a manager or IDH's safeguarding officer.

# 2.

## Risk management

### 2.1. IDH's Risk Management Framework

Risk assessment and risk management are crucial instruments to implement the safeguarding policy. IDH has a risk management framework in place, based upon the Kaplan-model<sup>6</sup>. In this model the categories have a direct relation with the type of mitigation measure, and this allows IDH to put mitigation measures in place that are effective for the specific identified risk.

This model identifies the following risk categories and mitigation measures and planning cycle:

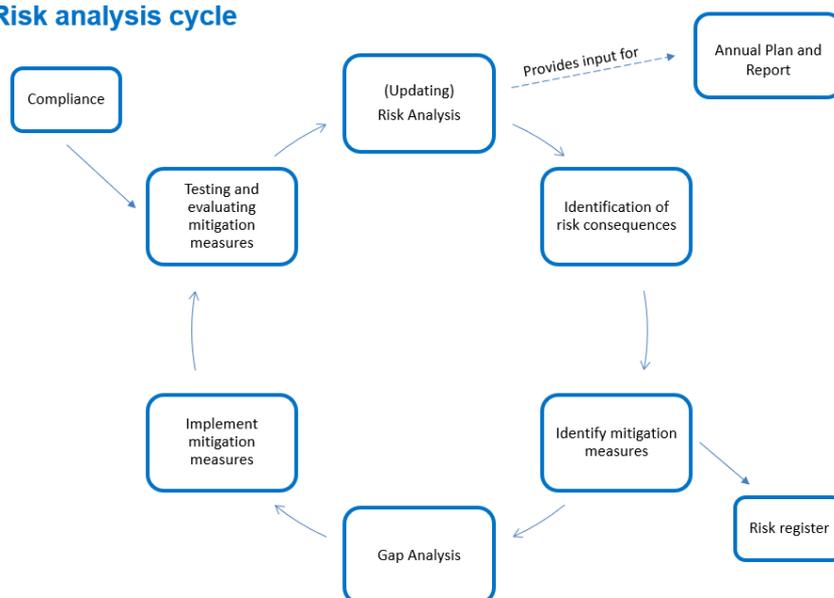
Type of Risk	Risk Mitigation Objective
<b>Preventable Risks</b>	
Risk arising from within the organization that generate no strategic benefits	Avoid or eliminate occurrence cost-effectively
<b>Strategy Risks</b>	
Risks taken for innovative and superior strategic returns	Reduce likelihood and impact cost-effectively
<b>External Risks</b>	
External, uncontrollable risks	Reduce impact cost-effectively should risk event occur

IDH applies this model to all the risk analyses it performs and the following cycle:

<sup>6</sup> Harvard Business School

- IDH Global level
- In-country level
- Program level (for example for the Farmfit program)
- Project level (as part of the investment note)
- Grantee (implementing partner) level for grants > € 50k (as part of the due diligence of the Partner).

### Risk analysis cycle



### Risk register

IDH maintains risk registers for the risk analyses performed on Global, in-country, program and (where required) on grantee level.

A risk register includes:

- Specific actions per mitigation measure
- Timeline for development and implementation per action/mitigation measure
- Owner is appointed per action/mitigation measure
- Occurrence identification (if applicable)

The risk register is reviewed and updated on quarterly basis and provides the input for the updated risk analysis that is performed on annual basis for IDH Global, in-country, programs and Partners. The Safeguarding Officer is informed of each quarterly update of the risk register in relation to safeguarding risks and will assess if this requires changes to IDH's safeguarding policy and practice.

## 2.1. Management of safeguarding risks in projects and with Partners

IDH manages (potential) safeguarding risks in projects and with Partners through its pre-contracting and contracting processes.

At IDH, the due diligence process for funding agreements consists of both an assessment of the project through the investment note as well as an assessment of the Partner, the one cannot be done without the other. The two combined assessments provide input for informed decision making on starting a (funding) collaboration with the Partner. Safeguarding and a safeguarding risk assessment are integral elements of the partner assessment and investment note. For consultants, safeguarding risks are assessed as part of the proposal.

Once the pre-contracting phase has been successfully completed and a decision has been made to start a collaboration with the Partner, IDH ensures appropriate safeguarding standards are applied in the delivery chain through its contracting.

### Management of safeguarding risks in pre-contracting phase

#### *Partner assessment*

IDH's approach towards due diligence with implementing partners is focused on documenting the identified risks and compliance with IDH's key criteria by interviewing the implementing partner. By doing interviews we have the opportunity to dig deeper in case of doubts or unclarities or to rephrase our question if needed. This is a different approach than requesting (formal) documents as is usually done when conducting a due diligence and is made possible because IDH is often deeply involved in the development of the program or project and because in most cases the contracting Partner is well known. This given is supported by Staff working in the regions where the project is implemented.

The partner assessment focuses on the governance, track record, financial management and internal controls, human resources of and monitoring and evaluation by the implementing partner. The partner assessment also includes an assessment of the reputation – including in relation to safeguarding – of the implementing partner, its owners or sibling companies, as well as core third party project partners. With regards to safeguarding, the partner assessment focuses on whether the implementing partner has a safeguarding policy, and if not, if it is able and committed to comply to IDH's safeguarding policy, the steps taken within the implementing partner's organization to implement and ensure compliance with the safeguarding

policy and the partner's approach to mitigate potential safeguarding risks in the project, if any. Finally, the partner assessment focuses on making the implementing partner aware of IDH policies, including the safeguarding policy, and informing them that they must comply with these.

The findings from the partner assessment must be shared with the secretariat of IDH's Investment Committee for approval. The secretariat of Investment Committee will decide whether the documents submitted are compliant and complete. This process ensures senior oversight on the management of safeguarding risks with implementing partners.

#### *Investment note*

At project level, safeguarding risks of all funding agreements are assessed as part of the investment note. As part of the investment note, the risks and opportunities in relation to safeguarding must be assessed. In the event of safeguarding risks, the investment note must include descriptions of the risk cause and risk consequence, the probability of the risk, the potential impact and the mitigation measures, including if IDH or the implementing partner will be the owner of these measures.

Investment notes must be submitted to the secretariat of IDH's Investment Committee for approval. The secretariat of Investment Committee will decide whether the documents submitted are compliant and complete. This process ensures senior oversight on the management of safeguarding risks in projects.

#### *Tender procedures*

Furthermore, IDH manages safeguarding risks for consultants assigned through a tender procedure and that will work directly with children and/or vulnerable adults by requiring the consultant to address safeguarding in their proposal. In its proposal the consultant must describe whether they have a safeguarding policy, and if not, if they are able and committed to comply to and implement IDH's safeguarding policy. Furthermore, the consultant must describe the steps (to be) taken to identify risks in relation to safeguarding in the project at hand and a clear approach to mitigate these safeguarding risks (if any).

#### *Management of safeguarding risks in contracting and implementation phase*

Once the pre-contracting phase has been successfully completed and a decision has been made to start working with the Partner, IDH ensures appropriate safeguarding standards are applied in the delivery chain through its contracting process.

Firstly, IDH shares this safeguarding policy through IDH's General Terms and Conditions with its Partners so that Partners are clear about IDH's standards and expectations in relation to safeguarding.

Furthermore, Partners are under legal obligation to comply with IDH's safeguarding policy through IDH's General Terms and Conditions. Our General Terms and Conditions apply to all legally binding agreements with Partners. Additionally, Partners are obliged to inform IDH on any safeguarding concerns, so that IDH can assess whether the issue has been addressed appropriately or assist the Partner in addressing it appropriately. Partners are also required to incorporate the obligation to comply with IDH's safeguarding policy or similar safeguarding standards in any sub-contract between the Partner and third parties related to the execution of activities by the Partner under its contract with IDH.

Furthermore, through its General Terms and Condition IDH requires its Partners to apply similar standards as included in IDH's Code of Conduct when working for IDH. In relation to safeguarding, the Code of Conduct includes requirements to treat all people with honesty, respect, dignity and fairness, to avoid unnecessary risks to safety, health and wellbeing to themselves and others, as well as a zero-tolerance statement on any form of discrimination, threats, acts of violence, intimidation, bullying and exploitation or harassment, including sexual exploitation or harassment (see also chapter 5. of the safeguarding policy). Finally, the Code of Conduct describes all reporting mechanisms available within IDH for Staff and Partners and Beneficiaries (see also paragraph 3.4 of the safeguarding policy).

Not acting in accordance with the safeguarding policy or not applying standards similar to those of the Code of Conduct by Partners will lead to appropriate actions. Actions may include, but are not limited to, working with the Partner to respond appropriately and implementing measures to improve its safeguarding policy and practice to prevent future breaches or terminating the agreement with the Partner, depending on the circumstances. The consequences for Beneficiaries of terminating the agreement will be assessed before such termination.

# 3.

## IDH's reporting mechanisms

### 3.1 Introduction

Speaking up is part of IDH's core value of integrity. IDH continuously works to create and maintain an environment in which Staff, Partners and Beneficiaries feel empowered and comfortable to share any concerns or issues. IDH facilitates speaking up through the reporting mechanisms of reporting within the organization and SpeakUp. IDH offers these reporting mechanisms internally to our Staff and also makes them available to external parties, such as Partners and Beneficiaries.

The aim of these reporting mechanisms is to provide those aware of, fearing or suffering inappropriate conduct in relation to IDH's work with the assurance that they will be heard and assisted in an appropriate and timely manner. Anyone reporting should be ensured that the reporting procedure is easy, and that their concerns are acknowledged and handled quickly, fairly and sensitively. Anyone reporting will be protected against reprisals and negative consequences after reporting a concern. Anyone reporting or providing information during the investigation of the concern should maintain complete confidentiality. This is not only important for an honest and transparent culture in which people are protected and connected, but also to preserve and enhance IDH's reputation. IDH recognizes that speaking up is crucial for dealing with (safeguarding) risks, both for enabling IDH to respond appropriately and prevent small concerns from becoming big issues, as well as to learn from raised concerns to prevent future issues.

Every year the confidential advisors of IDH prepare a report about the number of concerns raised within the organization and the execution of the

IDH SpeakUp policy. This report is sent by the Executive Board to the Employee Council. After the Employee Council provided their input the report is submitted to the Supervisory Board. See paragraph 7.3 of this safeguarding policy and the SpeakUp policy for more information on IDH's process for dealing with and responding to reports.

### 3.2 Reporting lines within organization

IDH has reporting mechanisms in place for Staff to report any (safeguarding) concerns within the organization.

IDH adheres to an open-door policy in which Staff can always contact their people manager to discuss anything they have on their mind, as well as raise any concerns they have. If Staff members are uncomfortable reporting to their people manager, for example because the issue concerns their manager, they are encouraged to speak to IDH's executive board.

Secondly, any concern encountered by Staff can be discussed with the IDH confidential advisors. The confidential advisor will listen and help to find a solution to the raised concern where possible. The confidential advisor will treat all information provided to him or her as confidential and will not share this unless specifically requested to do so by the Staff member in question. The confidential advisors are generally trusted persons within IDH with an exemplary position regarding compliance with IDH's Code of Conduct. They are well-embedded in the daily operations of IDH and their role is made known to all our Staff (among others through IDH's Code of Conduct).

### 3.3 SpeakUp

IDH uses the SpeakUp system for misconduct reporting. The SpeakUp system offers a low-barrier way for Staff and external parties to securely and anonymously report any inappropriate conduct that is occurring or suspected within IDH or another organization with which IDH is partnered. The SpeakUp system is run by external and independent organization People Intouch and is tailored to IDH's organization.

Reporting can be done [here](#) by leaving a voice message via phone (toll-free in most countries) or written message via web in the native language of the reporter. The reporter can choose to leave their message anonymously or share their name and contact details. The confidential advisor of IDH receives this message, confirms receipts and replies to it. IDH's reply can be accessed by the reporter via phone or web.

The SpeakUp system is focused on restoring trust between the reporter and IDH by offering easy, free-format reporting and letting the reporter choose which information they want to share during which stage, as well as by establishing a real dialogue between the reporter and IDH.

The SpeakUp system is available 24 hours a day, 7 days a week and 365 days across the world. To accommodate Staff and external parties in the countries and regions in which IDH has most activities, The SpeakUp system is available in 21 countries and 16 languages.

The SpeakUp policy describes clear process for dealing with reports, by whom and the timelines involved. The SpeakUp policy includes the elements that are required from a whistleblower policy based on the Dutch Whistleblowers Authority Act, such as:

- In what circumstances and how a reporter can file an external notification
- How a reporter will be protected against reprisals & negative consequences after a notification

### 3.4 Reporting of Partners to IDH

Through its General Terms and Conditions, IDH contractually obliges its Partners to report any safeguarding concerns promptly to IDH after the concern came to the attention of the Partner. IDH is often deeply involved in the development of programs or projects, which should make it easier for Partners to reach out to IDH in case of a concern. To further enable reporting by Partners, IDH's SpeakUp system is open for use by external parties through a special community line. Reporting on the community line can be done [here](#) by leaving a voice message via phone or written message via web in the native language of the reporter. Partners are informed of the SpeakUp system through IDH's Code of Conduct and this safeguarding policy when signing a contract with IDH. Based on the IDH General Terms and Conditions, Partners are encouraged to promote reporting concerns related to IDH's projects through IDH's SpeakUp system with their staff, subcontractors and Beneficiaries. IDH facilitates this by making available communication materials promoting the SpeakUp system in a visual way so that it is easy to understand for anyone how they can report.

# 4.

## Recruitment and selection

IDH recognizes it's important to have appropriate measures in place during the recruitment and selection process to prevent safeguarding issues from occurring by hiring the right person for the role.

For every new vacancy an intake meeting takes place between HR and the vacancy holder. The topics discussed during this meeting are the nature of the new position and the safeguarding risk in the position, e.g. whether or not the new Staff member will be directly working with children or vulnerable adults. If the new Staff member will be directly working with children or vulnerable adults or another safeguarding risk in the position warrants it, then the interviewer and HR perform the following safeguarding checks during the interview and selection process:

- a. HR trains the interviewers to make sure they are aware of our safeguarding policy and that they have the relevant knowledge to conduct an interview
- b. Interviewers ask candidates specific questions related to people's integrity, competencies, values and attitude in relation to the protection of children and/or vulnerable adults and previous behaviour in other jobs
- c. A reference check is standard procedure for all positions. If the candidate will work directly with children and/or vulnerable adults, HR will seek references from previous employers or others who have knowledge of the candidate's experience and suitability to work with children and/or vulnerable adults. Furthermore, if the candidate will work directly with children or vulnerable adults, HR will carry out a background check and ask for a Certificate of Conduct (in Dutch: *verklaring omtrent gedrag*) for

candidates in the Netherlands or a Police Clearance Certificate for candidates abroad.

- d. Once the new Staff member is hired, a standard probation period is included in their contract. Also, all Staff is given a copy of the Code of Conduct and safeguarding policy upon joining IDH. They are required to comply with the Code of Conduct and safeguarding policy by signing for acknowledgement of and compliance with the Code of Conduct and safeguarding policy in their contract.

# 5.

# IDH Code of Conduct

## 5.1 Introduction

Prevention of Harm begins with integrity within organizations and IDH continuously works to pro-actively prevent misconducts or irregularities from happening by promoting integrity as a core value, amongst others through its Code of Conduct. IDH's Code of Conduct provides the ethical framework in which IDH operates. It provides an overview of the values, commitments, responsibility and integrity we stand for. By operating within the framework of the Code of Conduct, a responsible and transparent environment is created, not only in conducting our business, but also in our organization internally.

IDH's Code of Conduct includes our commitment to provide a safe environment free from discrimination on any ground, threats and acts of violence, intimidation, bullying and from exploitation or harassment, including sexual exploitation or harassment. The Code of Conduct includes a zero-tolerance approach towards any form of such acts in the workplace. The Code of Conduct applies to all Staff, as well as our Partners.

## 5.2 Awareness of and compliance with the Code of Conduct

Awareness of and compliance with the Code of Conduct is ensured in several ways.

Awareness of the Code of Conduct is ensured by making training on the Code of Conduct part of the induction of new Staff. Broader integrity training that also covers the Code of Conduct is provided regularly to all Staff. IDH is

currently in the process of developing an e-learning that provides, among others, regular mandatory training on the Code of Conduct and integrity. The e-learning tool will be implemented and fully operational in 2020.

Furthermore, all Staff is given a copy of the Code of Conduct upon joining IDH. They are required to comply with the Code of Conduct by signing for acknowledgement of and compliance with the Code of Conduct.

Finally, our Partners have a contractual obligation to operate within the ethical framework provided by the Code of Conduct through IDH's general terms and conditions that are provided upon being contracted by IDH. Implementing partners are also made aware of the Code of Conduct and other relevant policies during IDH's partner assessment.

Non-compliance with the Code of Conduct and relevant supporting policies or procedures will result in proportionate corrective action towards Staff, up to and including dismissal. Not applying standards similar to those of the Code of Conduct by Partners will lead to appropriate actions, up to and including termination of the agreement.

# 6.

## Governance and accountability

### 6.1 IDH's governance structure

The IDH governance structure preserves the safeguarding culture through controls and oversight by the following corporate bodies:

#### The Supervisory Board and Executive Board

The IDH Supervisory Board (“SB”) supervises IDH Executive Board (“EB”) and holds the EB directly accountable for the way they steer IDH, including in relation to safeguarding. This is done through meetings between SB and EB at least once a year.

The EB is ultimately responsible for ensuring that safeguarding is applied consistently across our Staff and Partners, as well as across our programs and projects where children and vulnerable adults are involved. The EB will primarily serve the interests of IDH pertaining to IDH's public duties and will balance the interests of all parties involved when formulating policy. The EB is responsible for ensuring IDH upholds its safeguarding commitments described in paragraph 1.3. The EB increases accountability and transparency of IDH by sharing public announcements through IDH's annual report of impact, best practices and lessons learned together with stakeholders involved.

#### The Management Team

IDH's Management Team (“MT”) is responsible for the implementation and operationalization of the safeguarding policy and mechanisms within their business units. They must communicate safeguarding activities and concerns encountered within their business units to the EB in the monthly MT Meeting.

### Safeguarding officer

The EB has delegated responsibility for ensuring that IDH upholds its safeguarding commitments to the Safeguarding Officer. The Safeguarding Officer regularly asks the EB and MT for input on safeguarding concerns encountered to include in the risk register or the annual report as described below.

The core responsibilities of the Safeguarding Officer are to:

- a. Guide the implementation and management of the safeguarding policy throughout IDH
- b. Building Staff's awareness, understanding and capability to bring into practice the safeguarding policy, among others by ensuring Staff is trained in relation to the safeguarding policy within an appropriate timeframe of them joining the organization and receives regular mandatory refresher training afterwards
- c. Ensure that the Safeguarding Policy and its relating policies and implementation mechanisms are up-to-date
- d. Act as reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve the safeguarding policy and practice
- e. Prepare an annual report for the EB and MT about the number of concerns raised and the execution of the safeguarding policy

The Safeguarding Officer may delegate its safeguarding responsibilities locally to the IDH country office managers. The IDH country office managers are responsible for the implementation of the safeguarding policy in their region. They are responsible for including a chapter on the implementation of the safeguarding policy in their Workplan and report on it to the Safeguarding Officer. The country office managers assess any contextual issues with the safeguarding policy and will develop regional specific procedures if necessary. The country office managers will inform the Safeguarding Officer on contextual issues with the safeguarding policy and regional specific procedures developed, report any issues or concerns to the Safeguarding Officer and give input for the Safeguarding Officer's annual report to EB.

## Other

Before adoption of the safeguarding policy, the IDH Employee Council represents the interests of IDH's employees by giving consent and advice on the safeguarding policy. The Employee Council also represents the interest of IDH's employees in the execution of the safeguarding policy by giving advice on those areas that directly affect IDH's employees, for example the reporting mechanisms.

# 7.

## Measures to implement the policy

IDH takes the following steps to implement the safeguarding policy in its organization:

- Safeguarding officer
- Prevention measures
- Reporting and responding
- Maintaining and reviewing the policy

### 7.1 Safeguarding officer

IDH will ensure the safeguarding officer, and, if needed, country office managers are appropriately equipped for their role in relation to safeguarding. IDH will do so by making sure they are given enough time to develop the necessary skills and knowledge to implement the safeguarding policy, to report coherently, to communicate the safeguarding policy suitably within IDH and ensure its communication IDH's Partners.

### 7.2 Prevention measures

#### Recruitment

IDH will not knowingly recruit Staff in roles in which they pose a known risk to the safety or wellbeing of children or vulnerable adults. IDH prevents this by having a specific recruitment process in place for candidates that will work directly with children and vulnerable adults, which includes asking about competencies, values and attitude in relation to the protection of children and/or vulnerable adults in interviews, as well as seeking references of previous employers and carrying out background checks.

### Raising awareness

By providing training, IDH ensures all Staff is aware of the safeguarding policy and knows their responsibilities within it. New Staff receives mandatory training on the safeguarding policy, the SpeakUp policy and the Code of Conduct as part of their induction within a suitable and appropriate timeframe of them joining IDH. For all Staff there are regular mandatory refresher trainings on IDH's policies, including the safeguarding policy.

All Staff is required to sign for acknowledgement of and compliance with the IDH Code of Conduct and the safeguarding policy when joining IDH.

IDH ensures its Partners are made aware of the safeguarding policy and their responsibilities within it by sharing the safeguarding policy with each Partner when they sign an agreement with IDH. Implementing partners are also notified of the safeguarding policy as part of the partner assessment. Partners are contractually obliged to comply with the safeguarding policy.

Finally, the safeguarding policy will be published on our website and on the relevant social media channels to inform our Beneficiaries and the overall public. Relevant stakeholders are also informed on the implementation of the safeguarding policy and lessons learned through IDH's annual report.

### Risk management

Risk assessment and risk management are crucial instruments to implement the safeguarding policy. IDH has a risk management framework in place, which includes risk registers for the risk analyses performed on global, in-country, program and (where required) on grantee level.

Before selecting a Partner to work with, risks analysis in relation to safeguarding is an integral part of partner assessments, investment notes and/or terms of reference. While working together with a Partner, they are contractually obliged to comply with IDH's safeguarding policy.

## 7.3 Reporting and responding

IDH will ensure that all Staff and Partners will have access to information about how to report concerns or allegations of Harm. IDH encourages its Partners to promote reporting concerns related to IDH's work through SpeakUp with their staff, subcontractors and beneficiaries. IDH will always take seriously concerns or allegations of Harm and investigate appropriately. No one will be victimized for reporting a concern or allegation.

### Reporting mechanisms

The available reporting mechanisms are described in IDH's Code of Conduct and the SpeakUp Policy.

### Confidentiality

All reports and the information contained therein will be handled with the strictest confidentiality to protect the identity of the individuals involved appropriately and in accordance with national legislation.

### Investigation

The investigation procedures to be followed are included in our SpeakUp policy.

### Consequences

Not acting in accordance with the safeguarding policy by Staff will lead to appropriate disciplinary actions, up to and including dismissal. If a Staff member is dismissed for proven Harm, IDH will inform the relevant authorities, disclose this to potential future employers and/or refuse a reference, depending on the circumstances.

Not acting in accordance with the safeguarding policy by Partners will lead to appropriate actions. Actions may include, but are not limited to, working with the Partner to respond appropriately and implementing measures to improve its safeguarding policy and practice to prevent future breaches or terminating the agreement with the Partner, depending on the circumstances. The consequences for Beneficiaries of terminating the agreement will be assessed before such termination.

## **7.4 Maintaining and reviewing the policy**

IDH will integrate safeguarding measures into relevant core internal processes and procedures, such as partner assessments, investment notes, terms of reference, agreements, training modules, recruitment procedures and risk management framework.

The policy will be reviewed on a regular basis by the Safeguarding Officer. The Safeguarding Officer will prepare an annual report for the EB about the number of concerns raised and the execution of the safeguarding policy. Any findings requiring a change in policy will be made and approved by the EB (and EC if required).

Each country office will include a chapter on the implementation of the safeguarding policy in their annual workplan and report on it to the

Safeguarding Officer. They will inform the Safeguarding Officer of any contextual issues requiring regional specific procedures or a change in policy. A full review of the safeguarding policy should take place every three years, initiated and managed by the Safeguarding Officer, to include external and internal changes that may require a change in policy.

# 8.

## Annexes

- IDH Code of Conduct
- SpeakUp policy
- IDH General terms & conditions
- Risk Management Framework

The latest versions of these policies and the safeguarding policy can be found on our website: <https://www.idhsustainabletrade.com/policies/> or can be requested from your contact person at IDH.