



# Working with Itad

**Guidance and policy framework –  
suppliers' guide**

May 2024

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# About Itad

“Itad”, “we”, “our”, “us” refers to ITAD Ltd a UK registered company (company number: 01869600). Having its registered address at International House, Queens Road, Brighton BN1 3XE United Kingdom.

Itad is a global organisation. Our strategy, monitoring, evaluation and learning services work to make international development more effective. We generate evidence on important issues – from malnutrition to migration – to support our partners to make informed decisions and improve lives.



**40 years'**  
**experience**



**110 countries**



**195 clients**



**17 topics**

## Itad's Values

Our values influence all of our work and the way we run our organisation. They shape our decision-making, inform our policies and procedures, and are the foundation of our company culture.



**Making a difference:** We are dedicated to making a contribution to equitable and sustainable international development through the independent perspective we provide.



**Technical excellence and innovation:** We strive to do the best job possible; this challenges us to continually adapt by exploring new approaches and reflecting systematically on the quality of our work.



**Collaboration and learning:** We thrive in a learning environment. We work closely with others to generate and share knowledge and skills.



**Personal development:** We are committed to fostering our personal and professional development, working together within a supportive working environment which promotes diversity and a healthy work-life balance.



**Equality and inclusiveness:** We actively promote social inclusion, including gender equality, both through our work, with those we work with and within our organisation.

# Introduction

This document is designed to assist Itad's subcontractors, independent consultants and suppliers ("Suppliers") in understanding:

1. how Itad as an organisation works, its values and the standards its aims to provide to partners; and
2. the standards, policies and procedures that Itad expects its Suppliers (and where applicable the Supplier's personnel) to adhere to whilst providing services to and/or on behalf of Itad.

This document forms part of Itad's Registration Pack to ensure that Itad's Suppliers are aware of policies that they are required to comply with whilst a registered subcontractor. Unless the subcontractor's registration form states otherwise, the Supplier and its personnel shall comply with all policies contained herein.

Where this document refers to the term 'Agreement' this will be in reference to specific clauses of the Subcontract.

If the Supplier becomes aware of a reason as to why they will be unable to comply with any of the policies contained herein they should contact [suppliers@itad.com](mailto:suppliers@itad.com) as soon as possible. In such an event, Itad reserves the right to terminate any existing subcontractor agreements in place with the Supplier, and/or terminate the Supplier's registered subcontractor status.

The requirement to comply with this Working with Itad Policy, is an ongoing obligation and Suppliers are required to adhere to this Working with Itad Policy for so long as they are a registered subcontractor. To ensure such compliance is maintained, Itad reserve the right to:

1. conduct an annual review of Suppliers to assess compliance;
2. conduct due diligence when needed of Suppliers policies and processes.

In the event Itad identify a failure to adhere to this Working with Itad Policy, Itad have reporting mechanisms in place and reserve the right to take such action as considered appropriate.

## Updates

To ensure compliance with the law, FCDO guidance and industry standards, Itad will review this policy from time to time. In the event Itad identifies changes are required, Itad reserves the right to update this Working with Itad Policy upon reasonable notice.

## FCDO Supply Partner Code of Conduct

To provide some context as to the basis for the inclusion of the policies contained within this Working with Itad Policy, the policies have been developed to ensure they comply with **FCDO's Supply Partner Code of Conduct ("the Code")**. The Code demonstrates a push by FCDO to move towards a more compliance-focused approach regarding the conduct of its suppliers.

All Suppliers are required to comply with the Code in addition to the policies contained herein.

Further information regarding our policies can be [found here](#).

# Overview

This document does not provide an exhaustive list of all policies within the organisation but contains those that are most relevant to our way of being and operation. It also sets out our expectations of the suppliers that we work with.

## Ways we work

Safety & security  
Infosec & data protection  
Professional conduct

## Transparency & delivery chain

Due diligence  
Reporting concerns  
IATI

## Safeguarding

Code of conduct  
Governance  
HR practices  
Risk management

## VfM & Governance

Value for money  
Anti-bribery  
Fraud prevention

## Environment

Policy  
Reporting  
Commitments

## Ethics

Code of ethics  
UNGC  
Equal opportunities  
Whistleblowing  
Modern slavery

## Terrorism & security

Data protection  
Cyber essentials  
Digital principles for development

# VfM & Governance

Itad expects that all Suppliers ensure strict adherence to all UK and in-country government tax requirements and will as set out in the Suppliers Registration Form, either:

1. have in place and enforce their own policies in relation to fraud prevention and anti-bribery and governance policies that lead to a transparent and open book approach; or
2. adhere to the following:

## Fraud Prevention Policy

### Introduction

Itad is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this overarching Fraud Prevention Policy, is designed to preserve these values. Itad has and expects its Suppliers to have a zero-tolerance policy towards fraud, in all its forms. Itad is committed to protecting the funds it receives to ensure they are used appropriately to perform the services agreed with its clients. It is also committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter fraud.

### Purpose and scope of Policy

This Policy sets out how Itad views fraud, ensures protection of funds and sign-posts to other policies as appropriate.

Fraud is defined as any deliberate act intended to result in financial or personal gain to an individual or a company the individual is involved in, examples of fraud are as follows:

- Misappropriation of funds, services or other assets
- Dishonesty in the handling or reporting of money or financial transactions
- Using insider knowledge of company activities/information for financial gain
- Disclosing confidential company and/or client information to third parties
- Accepting or seeking anything of material value from third parties or potential clients of the organization. Exception: Gifts less than £50 in value.
- Destruction, removal, or inappropriate use of company information, or company equipment
- Any similar or related irregularity and dishonest act.

This policy signposts the reader to specific Itad policies which manage each of the above issues, which sit under this broader fraud category. The relevant Itad policies are follows:

- Ethics Policy
- Anti-bribery Policy
- Whistle Blowing policy
- Confidentiality



- Conflict of interest

All Itad Suppliers are required to sign up to these policies at the point of registration with Itad. At the point of contract all Suppliers (and personnel) working with Itad are required to confirm they have not committed fraud in the past. All policies noted above contain full definitions and guidelines on reporting should fraud be discovered or suspected during an engagement with Itad.

## Protection of Funds

Itad is committed to protecting the funds it receives from clients to ensure they are used for the purpose for which they are intended. As a professional services organisation we operate all of our client assignments as contracts for services and we subcontract for services and goods with external parties through the appropriate legal agreements. All of our client contracts are managed through a detailed accounting system that allow us to monitor costs and services in a timely manner.

When we engage Suppliers, we go through a registration process to check the suppliers/companies identity. As part of that process suppliers are required to sign various declarations one of which is to confirm they have not previously committed fraud. We ensure that the services that we procure from both companies and individual experts are governed by a subcontract agreement. Itad only pays for professional services that are per the deliverables in the contracts, once the Project Manager has confirmed the quality is as expected. Our suppliers are required to also ensure those policies are passed through their supply chain, including transparency of subcontracting.

We have a fully integrated finance system holding supplier information provided within their subcontracts. In addition, there is a rigorous process for setting up and signing off supplier accounts within a separate Itad team to ensure segregation of duties. When we receive an invoice from a supplier it is checked for completeness, all backup documentation is checked and the Project Manager is required to confirm all charges are per the subcontract and that the services have been received to the required level. The payments will be made to the vendor details that we have on file for the supplier. If the supplier requests vendor details to be changed, we have a formal policy to ensure that it is a genuine request from the supplier. All payment runs are signed off by a senior member of the finance team who ensures invoices have been correctly authorised.

# Anti-bribery Policy

## Introduction

One of Itad's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. Itad therefore has and expects its Suppliers to have a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

Itad is proudly committed to supporting the Ten principles of the United Nations Global Compact which includes a commitment to work against all forms of corruption, including extortion and bribery.

## Purpose and scope of Policy

This Policy sets out Itad's position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which Itad may carry out its business or in relation to which its business may be connected
- enabling employees and persons associated with Itad to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

This Policy applies to all Suppliers who perform functions in relation to, or for and on behalf of Itad, including but not limited to, Partners, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons").

## Legal obligations

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to Itad's conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- bribe a foreign public official

You can be held personally liable for any such offence.

It is also an offence in the UK for an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for Itad. Itad can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

### **Policy statement**

All Suppliers are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business;
- act honestly, responsibly and with integrity;
- safeguard and uphold the Itad's core values by operating in an ethical, professional and lawful manner at all times;
- Comply with the UK Anti-Bribery Act 2010.
  - [Http://www.legislation.gov.uk/ukpga/2010/23/contents](http://www.legislation.gov.uk/ukpga/2010/23/contents)

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

Itad recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all Suppliers, supplier personnel and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to the Project Manager.

The giving of business gifts to clients, customers, contractors and other suppliers is not prohibited provided the following requirements are met:

- the gift 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;
- it complies with local laws;
- it is given in Itad's name, not in the giver's personal name;
- it does not include cash or a cash equivalent (such as gift vouchers);
- it is of an appropriate and reasonable type and value and given at an appropriate time;
- it is given openly, not secretly;
- it is approved in advance by Itad.

In summary, it is not acceptable to 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, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a

“facilitation payment”, is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

### **Responsibilities and reporting procedure**

It is the contractual duty and responsibility of all Suppliers and personnel to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption. Suppliers must immediately disclose to Itad any knowledge or suspicion you may have that you, or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of Itad. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with Itad but equally to Suppliers too. Itad adheres to the Public Interest Disclosure Act 1988. Any concerns should be raised in writing to the Project Manager.

Itad encourages all suppliers and personnel to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed, and any action can be taken expeditiously. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. Itad is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

Itad will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody 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 corruption offence has taken place or may take place in the future.

### **Record keeping**

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal improper payments.

### **Sanctions for breach**

A breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

### **Monitoring compliance**

The Executive Committee has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Board who has overall responsibility for ensuring this Policy complies with the Itad’s legal and ethical obligations.

### **Training**

Itad’s zero tolerance approach to bribery will be communicated to all Suppliers at the outset of the business relationship with them and as appropriate thereafter.

# Ethics

Our Code of Ethics sets out guidance for the ethical behaviour of those that we work. We are expected by our clients to meet these standards and therefore require the same standards of our Suppliers. It is underpinned by our company values and sets out the minimum standards of behaviour and compliance. Where appropriate, the Code refers to legal requirements, other regulations and company policy. Our Ethical Framework includes policies in relation to professional conduct, modern-slavery, anti-bribery, equality and discrimination, research ethics, environmental and data protection.

Where relevant Suppliers will be expected to complete Itad's online Ethical framework training.

## Code of Ethics

**Good Governance and anti-bribery.** We have transparency and accountability in both contracts and working relationships. We take measures to avoid corruption and comply with our Anti-Bribery Policy and Procedures and ensure our Suppliers do the same, in accordance with the UK Anti-Bribery Act 2010.

**Equality and discrimination.** We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions or recommendations by issues of race, ethnicity or national origin, gender, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, age, disability, religion or belief. Our practices are bound by the UK Equality Act 2010, as well as other legislation Codes of Practice produced by the UK Equal Opportunities Commission, the Commission for Racial Equality and the Disability Advisory Service. Itad Suppliers are expected to act in accordance with these legal requirements.

**Quality assurance.** Itad's systems have been accredited for quality management under ISO 9001:2015. We encourage regular review meetings and provide regular progress reports. Internal Audits are conducted regularly to a planned schedule and those results are reviewed at management level. Quality and delivery expectations of our Suppliers will be detailed within the Agreement.

**Data Protection & GDPR.** Itad is registered under the UK Data Protection Act 1998 and has a Data Protection Policy that includes procedures on data retention and confidentiality. Suppliers are expected to adhere to the data protection requirements set out in Appendix 4 of the Agreement, when processing personal data for or on behalf of Itad.

**Confidentiality.** We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients, partners and consultants, both in terms of commercial confidentiality, and the protection of all personal information received in the course of providing our services. Suppliers should adhere to the provisions set out in clause 6 of the Agreement.

**Intellectual property and moral rights.** We retain the ownership rights of all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the intellectual copyright vested in our clients' intellectual property. Suppliers should adhere to clause 7 of the Agreement.

**Environmental.** Itad is committed to minimising any adverse environmental impact of its operations and services and to improving, where possible, the local, national and global environment for the benefit of present and future generations. We expect Itad Suppliers to support these policies and commitments through the delivery of their work.

**Professional Conduct.** Itad conducts all its activities professionally, with honesty and integrity and in compliance with UK law and the laws of the countries in which we are operating; and we expect our Suppliers to do likewise.

All Suppliers must therefore adhere to the following standards of professional conduct:

#### **Ethical Integrity**

- Be independent and impartial. Any conflicts of interest or partiality will be made explicit.
- Safeguard confidential, sensitive and personal data acquired through the project and not use it for personal advantage or for the benefit of, or detriment of third parties
- Be aware of the issues when interacting with vulnerable people and be sensitive to their needs.
- Be aware of differences in culture, customs, religious beliefs and practices, and any implications these may have in terms of interacting with people in the course of work
- Be sensitive to gender roles, and issues of disability, age and ethnicity, and be mindful of the potential implications of these differences when planning, carrying out and reporting on work
- Neither offer nor accept gifts, hospitality or services which could create, or imply, an improper obligation.

#### **Technical standards**

- Complete assignments on time, within budget and to Itad quality standards.
- Be flexible in attitude and adapt approaches as necessary when unplanned issues arise.
- Deploy tools and techniques to deliver effectively & efficiently despite challenging external factors.
- Accept responsibility for own professional actions and decisions.
- Deliver difficult messages at the highest level in an appropriate and professional way. At the same time, able to maintain productive working relationships with Clients.
- Work to keep key decision makers on side and 'bought in' from the start through to the end of an assignment.
- Understand when it is appropriate to escalate an issue to Itad (any issue regarding safety, that impacts on completing the work on time, to quality standards and within budget).

#### **Leadership and Team working**

- Respect and listen to different views/opinions within a team
- Communicate clearly and concisely in the most appropriate medium
- Be proactive in building rapport with colleagues, key associates, partners and clients
- Raise difficult issues with a view to positive resolution
- Be proactive in working with and sharing lessons with colleagues

- Manage own emotions and behaviour in difficult situations, ensuring own anxiety and/or frustration does not impact on others
- Always act in a way which supports and upholds the reputation and values of Itad.

## Equality policy

Itad is committed to promoting equality of opportunity for all and to complying with the Equality Act 2010. We aim to achieve a work environment free from discrimination or harassment, and in which all decisions are based on merit.

We do not discriminate on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**"Protected Characteristics"**). The principles of non-discrimination and equality of opportunity also apply to the way in which Itad treats its Suppliers.

All Suppliers have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass those that we work with regardless of their status.

All Suppliers therefore, are aware that the following acts are unlawful and/or would constitute misconduct and could result in disciplinary action, which may include dismissal:

- Discriminating in the course of their engagement with Itad against members of the public or those involved in the engagement on the grounds established in the Equal Opportunities Policy Statement.
- Inducing, or attempting to induce, others to practice unlawful discrimination.
- Indulging in verbal or physical sexual, racial or other harassment of a nature which is known, or should be known, to be offensive to the victim.
- Victimising individuals who have made allegations or complaints of sexual, racial or other
- Discrimination or raised concerns relating to any other harassment or provided information about such discrimination or harassment.



## UN Global Compact

We are committed to making the UN Global Compact and its principles part of our strategy, culture and day-to-day operations and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

Itad Ltd.'s Participant ID is: 126261

Suppliers are required to adhere and commit to the 10 UNGC principles listed below. You may be asked to confirm your organisations Participant ID.

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should ensure that their own operations are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Businesses should uphold the elimination of forced or compulsory labour.
5. Businesses should uphold the effective abolition of child labour.
6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against all forms of corruption, including extortion and bribery.

# Anti-Slavery and Human Trafficking Policy

## 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.

Itad has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organisation'. This legal requirement does not apply to Itad, however we are a strongly values driven company with a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We conduct all of our activities professionally, with honesty and integrity and with compliance with UK law and the laws of the country in which we are operating; and expect our clients, partners and Suppliers to do likewise.

The aim of Itad is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain.

## Structure and supply chain

Itad is a UK based company who conducts its services largely from the UK however this does not mean we are not exposed to the risks of modern slavery or human trafficking. We have a number of policies in place to mitigate these risks in our internal business operations and through our supply chain. Our sectoral risk of providing services is relatively low risk in comparison to other sectors such as the supply of goods. We partner with international suppliers to deliver services to our clients all over the world. We mitigate our supply chain risks through our due diligence and registration processes. Our Suppliers are required to comply with these registration processes, confirm their acceptance of this policy and confirm their adherence to legal requirements.

## Policies in relation to Modern Slavery and Human Trafficking

We have the following policies in place which form part of our risk mitigation:

- Safeguarding & code of conduct
- Ethics policy
- Whistleblowing policy
- Bullying and harassment policy
- Equality policy
- Recruitment and selection policy
- Supplier code of conduct

### Training and awareness

Itad is committed to sharing information and training about policies and good practice with all who work for us. This policy is provided as part of our 'Ways of Working' supplier pack. Online training is provided to all staff through our online training platform and to Suppliers where applicable.

### Responsibility for the policy

Itad's Executive Committee has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for Itad.

### Reporting concerns

If you feel comfortable in doing so you can raise your concern by speaking with your line manager (or project manager if you are external to Itad) or by e-mailing [reportingconcerns@itad.com](mailto:reportingconcerns@itad.com). You should express clearly if you would like your report to be treated as anonymous. Further information can be found [here](#)

## Whistleblowing Policy

Itad is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and other members of Itad to voice concerns in a responsible and effective manner.

Concerns on any subject can be raised with the relevant Project Manager or see the Reporting Concerns section.

This policy concerns 'Whistle Blowing' which has a specific meaning in law. If an individual brings information about a wrongdoing to the attention of their employers or a relevant organisation, they are protected in certain circumstances under the Public Interest Disclosure Act 1998. This is commonly referred to as 'blowing the whistle'. The law that protects whistle-blowers is for the public interest - so people can speak out if they find malpractice in an organisation. Blowing the whistle is more formally known as 'making a disclosure in the public interest'. If a matter is 'in the public interest' it will fall into one of the six categories as stated in the policy.

### Scope of Policy

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. termination of contract. Qualifying disclosures are disclosures of information where the individual reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

# Transparency and delivery chain

The FCDO requires full delivery chain transparency from all its supply partners. As an FCDO delivery chain partner and Itad partner or Supplier, Itad expect the Supplier to support UK government policy initiatives including the support of micro, small and medium sized enterprises (where it is able), to pay its Suppliers promptly, to take positive action at all times to prevent human rights abuses, tackle human trafficking and other modern slavery practices, and to support economic growth in developing countries.

Itad will not tolerate tax evasion, corruption, bribery and fraud by contractors and partners, and the Subcontractor's attention is drawn to the clauses in the Agreement which set out how Itad will respond to these types of incidents. The Subcontractor will provide assurance that the policies of their delivery chain also comply with this Code of Code.

Itad expect the Supplier to cooperate fully and to provide Itad with complete and accurate information to enable Itad to meet Itad's International Aid Transparency Initiative (IATI) transparency reporting obligations for FCDO funded data. Itad expects the Supplier to familiarise itself with IATI requirements and to understand what this means for the Supplier. If the Supplier is unclear then they should ask Itad for more information. The Supplier may not impose restrictive exclusivity in its subcontracts which attempt to prevent its subcontractors from working directly for Itad or FCDO.

## Reporting concerns

Itad is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff, sub-contractors, partners and those that we come into contact with a way to voice concerns in a responsible and effective manner.

Although the nature of a concern or issue reported may fall into different categories or processes the overriding principle is to report quickly and allow senior management to decide on the next steps.

We encourage employees and others who have serious concerns about any aspect of the Itad's work to come forward and voice those concerns. Those concerns could be in relation to (this list is not exhaustive); conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation), disclosures related to miscarriages of justice, Safeguarding issue, racial, sexual, disability or other discrimination, human slavery or trafficking, Health and Safety of the public/ and or other employees, damage to the environment, possible fraud and corruption or other unethical conduct.

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. You are encouraged to put your name to your report whenever possible, concerns expressed anonymously are much less powerful and may impede the investigation.

You should report the nature of your concern and why you believe it to be true and provide any relevant background details related to the concern. If you feel comfortable in doing so you can

raise your concern by speaking with your Project manager or by e-mailing [reportingconcerns@itad.com](mailto:reportingconcerns@itad.com).

You should express clearly if you would like your report to be treated as anonymous.

Further information regarding Itad's related policies can be requested by contacting [mail@itad.com](mailto:mail@itad.com). In relation to projects funded by the FCDO, you can also report all suspicions or allegations of corrupt practice to the Internal Audit Department's Internal Audit Investigations Section via [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk) or on +44 1355 843747.

# Safeguarding

## Safeguarding Policy & principles

Unless otherwise agreed with the Subcontractor, this Safeguarding policy sets a standard to which all Itad Suppliers are expected to comply and is driven from our company values and our culture. Adherence to this statement and its principles is expected throughout all of our internal and external activities. Suppliers should refer to clause 6 in relation to confidentiality of the agreement for specific requirements.

Depending on the nature of the services being provided to Itad, Suppliers may be asked to complete Safeguarding training to ensure they can fulfil the services to the client.

Safeguarding is a term used to describe how we protect adults and children from abuse or neglect and this policy sets out a framework for how Itad aims to ensure that we protect the wellbeing of our staff, Suppliers and those that we come in contact with through our work as far as possible. We recognise that the care and welfare of those we work with, and of our staff, is paramount and that everyone has the right to be protected from all types of harm.

Itad uses a broad definition of safeguarding, which is to prevent, protect and respond to harm caused by sexual exploitation, abuse, harassment and bullying.

This document sets out a policy and framework of guidance that we expect Suppliers to follow.

Behaviours that we expect to see are:

- Accountability – If you have a concern then respond or report, never assume someone else has or will
- Advocacy – Help others to put forward their own point of view. Leadership ensure that staff and others feel able to raise issues in confidence and that they will be listened to and responded to.
- Inclusion & equality – every individual is equally important and valuable and should be treated in that way. Everyone has an equal right for protection from harm and abuse
- Act quickly – take action and provide support as soon as a problem emerges before it gets any worse
- Vigilance and understanding – It can be easy to say that we are all busy, but it is important to take the time to understand situations and be alert so we can notice when something isn't right and respond appropriately
- Confidentiality – depending on the nature of the situation it may be appropriate to act with a high degree of confidence to protect the anonymity of individuals involved.

Itad's principles to safeguarding are:






- Do no harm - we aim to protect the wellbeing of each other and those we come into contact with through our work.
- Everyone is responsible for safeguarding, not just management. We are all responsible for ensuring the safety and wellbeing of others and should report issues so they can be responded to accordingly. Therefore, we expect everyone to engage in this policy and its guidance to ensure it is best practice.
- We will act with integrity, be transparent and accountable. We will respect confidentiality where required.

- All actions taken will be done in the best interest of the child or adult.
- Everyone is treated equally irrespective of race, age, gender, religion, sexual orientation or disability.
- We will respect confidentiality when required and will take a survivor centred approach.

As an organisation, Itad is committed to:

- Protecting those we come in contact with against physical and emotional harm, including all forms of physical and mental violence, injury or abuse (including sexual abuse), neglect or negligent treatment, maltreatment or exploitation.
- Ensuring checks are made when recruiting staff, subcontractors and consultants.
- Sharing information and training about policies and good practice with all who work for us.
- Sharing information and reporting about any concerns or issues with relevant agencies.
- Providing a safe supportive culture so that staff, consultants and partners are able to raise issues and concerns related to safeguarding appropriately.
- Leadership are committed to taking potential safeguarding issues seriously and in ensuring that appropriate steps are taken in a transparent and accountable way.

## Framework of related policies and guidance

				
Safeguarding Policy	Whistleblowing	Human Resources	Code of conduct	Governance & risk management
Policy Behavioural expectations Principles & commitments Related Policies & guidance (as part of this framework) Child protection policy	Policy Personal grievances Concerns about partners or clients Procedure for making a disclosure	Roles & responsibilities Training Consulting Recruitment & selection Reporting & responding	Professional code of conduct Ethical integrity Behavioural expectations (leadership & team working)	Safeguarding Officer Roles & responsibilities Risk management managing subcontractors risk register & owner Reporting to the board



## Child protection

Itad works with children and young people both directly and indirectly. Itad's direct work with children and young people includes, but is not limited to, interviews, focus groups discussions and participatory research processes. Indirectly, Itad employees, subcontractors and consultants may come into contact with children whilst working with adults and in children's communities.

Our Child protection policy and process is aligned with our overall approach to Safeguarding to ensure that we protect the wellbeing of all of those that we come into contact with.

### Our commitments

Itad is committed to:

- Protecting all children and young people involved in its activities from physical and emotional harm, including all forms of physical and mental violence, injury or abuse (including sexual abuse), neglect or negligent treatment, maltreatment or exploitation
- Adhering with UK child protection laws and relevant laws in each of the countries we operate in, as well as by adherence to the United Nations Convention on the Rights of the Child (UNCRC) 1989.
- Ensuring effective processes are in place for reporting child protection issues and responding to allegations.
- Ensuring relevant checks are carried out when recruiting employees, subcontractors and consultants who will be working directly with children or young people i.e. on a project that involves
- Ensuring all employees, subcontractors and consultants receive appropriate training on safeguarding and child protection issues.

As set out in the Code of Conduct and risk assessment tools, Itad Suppliers should:

- Be aware of situations which may present risks and manage these
- Plan and organise the work and the workplace so as to minimise risks
- As far as possible, be visible in working with children
- Ask the parents of children/young people for their permission to participate in interviews
- Be accompanied by a second adult whenever possible when conducting interviews with children
- Work in partnership with the parents/carers and/or other professionals to ensure the protection of children.
- Avoid doing something that could be misinterpreted by a third party.

## Safeguarding Code of Conduct

Where relevant subcontractors are required to sign Itad's Safeguarding Code of Conduct as a condition of engagement with Itad. A copy of the code will be provided at point of engagement it is also provided in this policy for information.

### Scope and purpose

All staff and subcontractors are required to sign this Safeguarding Code of Conduct as a condition of employment or engagement with Itad. You are expected to uphold the integrity and reputation of Itad by ensuring that your professional and personal conduct is consistent with Itad's values and standards.

Safeguarding is a priority for Itad. All those covered under the scope of the policy are expected to accept certain responsibilities, adhere to acceptable business principles in matters of personal conduct, and exhibit a high degree of personal integrity at all times.

This Code of Conduct sets out a minimum standard in terms of behavioural expectations. The Code is applicable at all times. This not only involves respect for the rights and feelings of others but also demands that you refrain from any behaviour that might be harmful to you, your co-workers, and/or Itad, or that might be viewed as such by the public at large.

Whilst recognising that local laws and cultures differ considerably from one country to another, Itad works internationally, and therefore the Code of Conduct is developed from international standards. Itad staff and subcontractors are expected to uphold local law as a minimum wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

Breaching this Code of Conduct may lead to suspension (this may be immediate and without prejudice) and following an investigation, termination of any type of engagement with Itad. This will be on a case by case basis ensuring that applicable employment conditions and legislation are covered and that relevant disciplinary processes are followed. Where necessary it will also result in information being passed onto relevant regulatory bodies, funders, law enforcement, and child protection agencies.

Itad is an inclusive organisation and understands that inerrant characteristics may place certain individuals at a higher risk within local laws due to their personal profile that may cause inadvertent breach of code of conduct (race, religion, sexuality or gender). In these instances, Itad will provide additional support prior and during travel alongside mitigation measures to ensure all independent consultants are supported whilst upholding our safeguarding responsibilities and review any breaches on a case by case basis.

### Definitions

Child: Everyone under the age of 18

Adult at risk:

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

- Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

## **Code of conduct standards**

### **ALL ITAD STAFF, SUPPLIERS WILL NOT ENGAGE IN ABUSIVE OR EXPLOITATIVE CONDUCT, INCLUDING;**

- Engage in any form of sexual relations with anyone under 18 years old, regardless of the legal age of sexual consent, the law and local customs. Mistaken belief in the age of a child is not a defence.
- Engage in any form of sexual relations with any adult at risk.
- Exchange money, employment, goods or services for sexual favours.
- Subject anyone to any kind of humiliating, degrading or abusive behaviour, including but not limited to physically or verbally.
- Initiate or engage in contact with children/adult at risk and their families that you come into contact with through work via social networks in an unprofessional manner.
- Will not use any IT (Itad's or personal) equipment to engage in activity that is illegal under local or international law. Will not view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

### **All Itad Suppliers agree to:**

- Declare any conflict of interest whether it be financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of Itad.
- Ensure that concerns, allegations or suspicions of safeguarding are reported in accordance with Itad's safeguarding policy.
- Respect an adult at risk/child's right to privacy and maintain confidentiality when required.
- Respond to a child/adult at risk who may have been abused or exploited in accordance with Itad's safeguarding policy.
- Cooperate fully and confidentially in any investigation of concerns or allegations of safeguarding.
- When working with children and adults at risk, ensure compliance with Itad's Child Protection Policy and other relevant policies and legal frameworks.
- Avoid any unnecessary risk to the safety, health and welfare of myself and others (including partner organisations and the communities with whom we work), comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines.
- Protect any personal data that may have been collected from the communities in which we work by following Itad's data protection policies and procedures.

<sup>1</sup> [UN Convention on the Rights of the Child definition](#)

## All Itad Suppliers will make every effort to:

- Actively contribute to building an environment where all are respected and encouraged to discuss their concerns and rights.
- Plan activities in a way that is respectful of individuals' rights and dignity, considers their best interest and minimises the risk of harm, in line with other relevant policies.
- Help children and adults at risk to take part in decision making and maintain a culture of communication.
- Inform children, adults at risk and their communities of their right to report any concerning situations.

## Governance & Risk management

Itad commit to:

- Ensuring that these expectations and policies are adhered to by our Suppliers and downstream partners
- Reviewing this framework of policies at least annually to ensure it continues to reflect Itad culture, values & best practice within the sector
- Ensuring that issues raised under this framework are responded to quickly, appropriately and ultimately with the welfare of those involved at the forefront Ensuring that risks are mitigated appropriately, particularly within projects which involved contact with children or vulnerable adults

## Designated Senior Safeguarding Officer

Itad's Senior Safeguarding Officer is responsible to deciding on the course of action to be taken should a Safeguarding issue be reported. It may be that the issue falls under a different reporting process depending on the situation, however the Senior Safeguarding Officer will ensure that the issue is responded to quickly and appropriately and will act in a confidential way to protect those involved when required.

## Risk management

Principle Safeguarding risks in Itad's operations exist in projects which involve:

- working with vulnerable adults and/or children, directly or through 3rd parties
- working in countries with a high safeguarding risk environment (e.g. where there is credible data of exploitation/abuse at official or community level)
- working with unverified 3rd parties
- unexpected engagement with vulnerable adults and/or children

Itad has included safeguarding criteria in existing risk management processes which start at the Proposal stage. This allows for consideration of potential safeguarding issues and mitigations at the start of the project process.

The criteria for highlighting risks include a combination of countries with known high safeguarding environments; projects which involve access to vulnerable adults and/or children; working with unverified 3rd parties.

This risk assessment is then revisited at Project kick-off stage and again at set points in time depending on the phases of the project. See Annex 5 for an overview of the project process.

Any projects rated high risk or above are escalated to the Senior Safeguarding Officer and the Safeguarding Ethics and Data Committee (SEDC) and any projects rated extreme risk and above are escalated to the Audit, Risk and Resilience Committee (ARRC). Other risks will be reported to the ARRC Quarterly and will include audits of projects to ensure the right processes are being put in place.

### Supply chain management

When Itad enters a partnership or consortium with other companies or organisations it is part of Itad's due diligence to check that those we are working with will also ensure the safeguarding of their staff and contracted consultants as well as those they come into contact with through their work

### Training

On projects where the safeguarding risk is deemed to be high or complex, safeguarding training may be required for team members. This will be at the discretion of Itad and the SEDC. Training may take two forms; an online course or an online attended session completed by a facilitator. All team members, both company affiliated and individual will be required to attend. In cases where language barriers may prevent team members from understanding training, a training of trainers will be provided alongside resources to then be passed down to the rest of the project team. Time for this will be compensated.

### Reporting and raising concerns

Although the nature of a concern or issue reported may fall into different categories or processes the overriding principle is to **report quickly** and allow the Senior Safeguarding Officer to decide on the next steps. Suppliers should raise their concern to the relevant Itad Project Manager where possible. Where this may not be appropriate, please refer to the Reporting concerns section of this policy.

### How should you report?



Itad is committed to the highest standards of openness, probity, and accountability. To support this, we encourage any person who has a concern related to us or our work to report these concerns so we can act swiftly and decisively on any issues raised.

For concerns related to Itad directly, its conduct or any of its staff please report directly to [reportingconcerns@itad.com](mailto:reportingconcerns@itad.com). This email can only be viewed by the Head of HR, Head of Safeguarding and the Compliance Manager and will feed directly into our response mechanisms.

## Reporting form

A member of the Safeguarding team will complete a Safeguarding reporting form. Your information will be treated in confidence. You are able to remain completely anonymous if that is your preference, but this may impede the investigation of your concern.

## Reporting a safeguarding concern where 3rd parties are involved:

If there is an episode of abuse, exploitation or harassment, our expectation is that the organisation takes it seriously through reporting, learning (e.g. changes made to policies and practices) and providing support to those affected. It is also important to take account of local context where reporting to authorities would cause further harm to the beneficiary/survivor. Consideration should also be given by the organisation to the support needed by staff and volunteers aiding victims of sexual abuse, exploitation and harassment.

## Receiving a Disclosure

There may be an instance where a beneficiary or interviewee reports or mentions issues that raise a safeguarding concern. This could range from a behavioural concern to a disclosure of abuse.

Training around how to handle receiving a disclosure is covered in specific safeguarding training on Extreme risk projects. However, this may not be the only situation this issue is raised.

In instances where a disclosure is given

1. Gently close the interview, work on containment, referral, and discuss what happens next. This will include where the disclosure may go and referral to support services.
2. Never promise to be able to keep a disclosure a secret
3. Report the disclosure into our safeguarding system so that a decision can be made around what to do next.

# Environmental

We are a socially-conscious organisation which is committed to the ten UNGC principles – our primary purpose is to provide insights and drive better use of resources in international development. Unfortunately, it is the poor and marginalised communities that we aim to help who will be most affected by the effects of global warming. Facts such as these have encouraged us to look inwardly and think about what we can do as a company to be part of the solution, and not the pollution – especially considering our carbon footprint due to frequent international travel to deliver our work. Our position as leaders on evidence-based reflection and strategy put us in a great position to push for climate smart ways of working and living and we expect our Suppliers to engage in this with Itad as part of our delivery.

Itad is committed to minimising any adverse environmental impact of its operations and services and to improving, where possible, the local, national and global environment for the benefit of present and future generations.

Suppliers should refer to Appendix 6 of the Agreement.

This policy presents our approach to managing Itad's environmental impact and details our commitment to continually improving our corporate environmental performance. We commit to:

- Monitoring and reporting on Itad's environmental impact
- Embed the mitigation of adverse environmental impact across our projects
- Engage those that we work with in a culture of environmental awareness and responsibility

We expect Suppliers to commit and engage in the following:

- To conserve energy, water, paper and other resources, particularly those which are scarce or non-renewable, while still maintaining a safe and comfortable working environment
- To reduce waste through minimisation, reuse and recycling (3 Rs) and by using sustainably sourced and recycled products and materials where available
- Incorporate environmental considerations into all relevant decisions and activities
- Avoid the purchase of products using excessive packaging
- Work with clients to improve environmental performance where this is relevant to the contract

We expect Project teams to commit and engage in the following:

- When designing the delivery of our projects, alternative means to international flights should be considered. For example, considering if and when team meetings can be held remotely (via online conference software) rather than face to face.
- Consider the local context and the specific potential environmental impacts of our work and engage with local partners when required to ensure we minimise any impacts.

# Terrorism and Security

## Data protection

As part of our operations involves the handling of personal information about individuals, we have a number of legal obligations to protect that information under the General Data Protection Regulation (GDPR) (EU) 2016/679.

**Itad Registration** Itad is registered with the Information Commissioner's Office (ICO) under the General Data Protection Regulation – registration number: Z2148216.

## General Data Protection Regulation (GDPR)

- GDPR applies to living, identifiable people such as job applicants and workers. (Particular applications in Itad include: the CV database, records of account details etc in the finance office, recruitment processes).
- Through the data protection principles, it regulates the way information about them can be collected, handled and used. It promotes transparency when processing data and enforces legitimate data processing.
- The Regulation applies to computerised information and to well-structured manual records such as certain files about job applicants.
- Under GDPR individuals now have following rights which you need to be aware of;
  - [Right to be informed](#)
  - [Right of access](#)
  - [Right of rectification](#)
  - [Right to erasure](#)
  - [Right to restrict processing](#)
  - [Right to data portability](#)
  - [Right to object](#)
  - [Rights related to automated decision making including profiling](#)
- A guide to the principles of GDPR in detail can be found at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>
- A guide specific to employment practices can be found at: [https://ico.org.uk/media/for-organisations/documents/1064/the\\_employment\\_practices\\_code.pdf](https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf)

Suppliers should adhere to the requirements set out in Appendix 4 of the contract and may be asked to provide copies of their data protection policies.

## Cyber Essentials

Itad can confirm that we operate in accordance with the HMG Cyber Essentials Scheme and we hold a valid certificate to confirm this. We also hold the IASME Certificate of Assurance. Itad Suppliers may be required to provide a copy of their Cyber Essentials certificate.

## Principles for Digital Development

Itad understands that the 9 Principles for Digital Development are a set of guidelines intended to help practitioners applying digital technologies to development programmes. The 9 principles are:



- Design with the user.
- Understand the existing ecosystem.
- Design for scale.
- Build for sustainability.
- Be data driven.
- Use Open Standards, Open Data, Open Source, and Open
- Innovation.
- Reuse and Improve.
- Address Privacy and Security.
- Be collaborative.

The nature of the project that Itad is undertaking will determine whether we are able to apply these principles. Where possible (i.e. where Itad may be involved in the design of a project) Itad declares that we will adhere to these principles and expect our Suppliers to engage in this with us.

## Terrorism

Itad declares that we have never been convicted of terrorist offences or offences linked to terrorist activities. We also take steps to ensure that firms or individuals connected to us have not been convicted of any terrorist offences or are linked to terrorist activities.

<https://www.gov.uk/government/publications/current-list-of-designated-persons-terrorism-and-terrorist-financing>

<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>

As part of Itad's registration process Suppliers are expected to provide the same declaration as above.

Should this position change and any subcontractor or any firm or individual connected to Itad is found to have been convicted of terrorism offenses then it will be reported through the contracting chain and Itad will cease to work with that individual or subcontractor immediately.

## Global Safety & Security

### Policy Statement

Itad, provides insight and ideas to drive more effective use of resources in international development. To fulfil this strategic objective, Itad's Suppliers operate in environments that contain a broad range of safety and security risks.

In recognition of this, Itad has developed a Global Safety & Security Risk Management Framework that aims to manage and minimise the safety and security risk that its employees and consultants may be exposed to when travelling overseas, following an incident, and during the delivery of projects.

At Itad, the management of safety and security risk is seen as an enabling process that forms an integral part of day-to-day decision making, and that positively contributes towards Itad's broader strategic objectives rather than inhibiting them.

Suppliers should refer to Appendix 5 of the Agreement.

### Scope & Application

Itad's Global Safety & Security policy applies to all consultants that are working or travelling across the entire breadth of activities that Itad may undertake internationally. Itad's Global Safety and Security Policy articulates our corporate risk appetite and outlines roles and responsibilities, core principles, and standards, which should all be adhered to by employees and consultants that travel on behalf of Itad. Under this context, travel includes National Consultants who travel outside of the location where they are ordinarily resident.

***Any violations of this policy by employees and consultants may result in disciplinary measures being taken, including the possible termination of their engagement or association with Itad.***

Third parties such as subcontractors, agents, joint venture associates or suppliers engaged by Itad must not do anything to put Itad or any of its employees or consultants in breach of this policy. They must also reasonably co-operate with Itad to ensure that this policy is put into and remains in effect throughout the duration of the relevant project in which they are involved. Third party capacity to uphold this policy is determined through regular due diligence.

**Failure by a third party to meet its obligations under this policy may result in Itad terminating its engagement.**

### Risk Appetite

Itad's approach to the management of safety and security risks is not to simply avoid them, but to **manage** them within acceptable limits to ensure that the likelihood and impact of its employees and consultants suffering unnecessary harm is minimised as far as reasonably practicable.

Itad's appetite to accept safety and security risks will always be informed by a methodical and calculated assessment. The following risk appetite statement applies to all projects and overseas travel undertaken by Itad employees and consultants:

**Itad is not willing to take extreme safety and security risks to meet any of its strategic objectives or deliver projects. Where residual risks are determined to be high, Itad will weigh these risks against the project's criticality or the necessity to travel and will always seek to ensure primacy of human life.**

## Duty of Care

For Itad, Duty of Care is defined as an obligation to ensure that reasonable care is taken to protect employees, and consultants and associated parties from unnecessary risks when they are performing foreseeably harmful activities during the course of their work. Itad accept this Duty of Care towards its employees and independent consultants.

Duty of care encompasses legal, contractual, and moral elements. It is the moral obligation that provides the driving force for Itad in recognition of the value of our staff and consultants.

Itad recognises that it is limited in what it can reasonably provide by way of support for different individuals it bears a duty of care towards. As such, the following outlines what Itad is committed to provide for all individuals that come under its duty of care responsibilities:

For **employees** and **consultants**, Itad is committed to:

- Providing a set of coherent and accessible policies, procedures and resources that support the management of safety and security risks during all MEL activity, high risk location domestic travel, or following a safety or security incident
- Informing employees and consultants of any safety and security policies and procedures they must follow whilst travelling, delivering projects, and following an incident
- Briefing employees and consultants on any roles and responsibilities that are assigned to them for managing safety and security risks upon taking up their duties;
- Providing 24/7 support in the event of a security or safety incident;
- Providing access to comprehensive global travel and medical assistance through sufficient corporate insurance;
- Providing access to appropriate security training commensurate to risk exposure and/or role;
- Providing access to contextual safety and security information through dedicated closed-sources, and circulate other pertinent information derived from open-sources.

For **third parties working as agents, subcontractors or in partnership with Itad**, Itad is committed to:

- Ensuring external companies are aware of and fully understand this policy, and agree to subscribe and adhere to Itad's principles when undertaking work on behalf of Itad;
- Assessing the capacity and capabilities of external companies in terms of their ability to manage safety and security risks in line with Itad's principles and standards, and providing guidance and support where gaps are identified;

- Where possible, supporting external companies in responding to an incident or crisis when it has occurred during the contract period.

## Duty of Care Framework

Itad's operating environment is constantly changing, and the security challenges are becoming more complex. Deploying MEL activity into insecure environments balances personnel safety and assuring access to often remote conflict-affected locations. Itad takes a comprehensive approach to managing all the risks to which staff and consultants are exposed to in the course of their work.

### Individual Roles and Responsibilities

All employees and consultants are responsible for ensuring they remain informed of the safety and security risks that they may be exposed to when working or travelling globally. Additionally, all employees and consultants are expected to:

- Awareness and understanding of this policy
- Adhere to this and Itad's other policies
- Behave in a way that does not expose colleagues or partners to any unnecessary harm or place them in any undue danger
- Observe local national laws; show respect for local customs and cultural practices

## Verbally report any safety or security concerns or incidents immediately (including near misses), and follow this up with a written report

### GSS Core Principles

Itad has developed a set of safety and security core principles that its staff and consultants must consistently apply across the entire breadth of Itad's activities:

- **Primacy of Human Life** - No employees, consultants or associated parties should place themselves at unnecessary risk to meet the strategic objectives of Itad or protect its equipment, reputation, or project integrity. This prioritises any expectations that may be placed on employees and consultants to complete work on behalf of Itad.
- **Informed Consent** - All employees and consultants will be provided with sufficient information, training, and awareness to enable them to determine their own exposure to safety and security risk. Itad will make every effort to ensure any decisions made by employees and consultants to consent to these risks remains informed.
- **Right to Freely Decline** - Employees and consultants are free to decline any travel they are tasked to undertake on behalf of Itad if they feel risks are unreasonable. This includes declining travel to a specific project location **before** departure or asking to withdraw from a project location **during** travel based on their assessment of safety and security risk (not based on levels of comfort/convenience). On all occasions the decision by the employee or consultant to decline activities based on safety and security risk will be respected, regardless of Itad's assessment and without fear of any repercussions or reprisal. Conversely, should Itad determine that the safety and

security risks associated with project delivery is beyond its own risk appetite, any directives issued by Itad to cancel, postpone, or suspend project delivery or travel, or withdraw employees or consultants from a project location must be respected.<sup>1</sup>

- **Inclusion** – Everyone has a part to play toward contributing toward effective management of safety and security risks during MEL activity or following an incident when delivering projects. It is simply mandated by the Board of Directors but must be fully embedded through the management of all projects and travel (from inception to conclusion) and engrained in the personal behaviour and conduct of all employees and consultants who are representing Itad. All employees and consultants have a right to voice any concerns they have over safety and security to Itad. Itad’s staff and consultants who receive these concerns must treat these concerns seriously, allocate sufficient time for feedback to be acted upon regardless of any other competing work pressures.<sup>2</sup>
- **Active & Adaptive** – There is never a “one size fits all” approach to managing safety and security risks. The environments that Itad operates in are fluid and dynamic, therefore the application of security measures must also be adaptive. Whilst Itad policies, procedures and resources guide how safety and security risks are managed during MEL activity, or following an incident during project delivery, they must remain appropriate to the current contexts and circumstances.
- **No Bribes or Concessions** – Employees and consultants must not offer any rewards, inducements or bribes to any person, group, or organisation to either conduct their normal tasks or to perform illegal services. This is distinguished from responding to extortion where there is a clear and immediate threat to life.
- **Restricted Use of Weapons or Armed Assets** – Itad avoid using weapons or armed assets as a protective or deterrence-based security strategy wherever practicable. However, we recognise that in certain insecure environments Itad or our partners may be required to engage armed personnel as dictated by local norms, regulations or legislation set by host governments. This must remain the exception and is only authorised by the ARRC following the review of a detailed security risk assessment and mitigation plan.

Where Itad is required to interact or engage with armed personnel (including the military or police forces) Itad will ensure it remains separate and independent from these entities as far as reasonably practical. Where frequent engagement and interaction with armed actors is foreseen, this must be escalated to the ARRC who will

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<sup>1</sup> Failure to respect withdrawal or cessation directives may lead to disciplinary action including suspension or termination of employee or consultant contracts.

<sup>2</sup> Staff and traveller profiles will afford them differing needs in relation to overseas travel and incident management. All staff and travellers will be treated with equity relating to travel and incident management. Itad will not discriminate against any person because of personal characteristics including, but not limited to, race, gender, disability or sexual orientation and accommodations be provided, as far as reasonably practical, to support every person as needed.

determine whether the associated risks have been mitigated to within acceptable limits.<sup>3</sup>

- **Equity** – Itad is committed to ensuring all consultants that fall under its DOC are receive equitable safety and security risk management support. International and in-country consultants face different risks based on their personal profile, experience, training background, and tasks assigned to them. Through our security management systems, we strive to ensure that risk is universally mitigated to an acceptable level, even though risk management strategies may necessarily differ depending on the profile of our team members.

## Emergency Incident Response

To support our subcontracted individuals, Itad have a trained in-house Crisis Management team (CMT), Media team, Family Liaison Team and external emergency assistance provider that in the event of an incident can mobilise to assist our teams in all locations Itad work in.

The CMT ensure that any medical emergency is being treated by the best physicians in the region at internationally recognised hospitals, mobilise medivacs, and arrange direct payments through Itad's travel insurance. In cases of security incidents, our incident response partner can organise an on the ground support team in any country we operate in to support our team members and monitor global events to make sure our teams are fully informed of the situation on the ground at any time.

## Travel arrangements

### Visas – applicable to individual subcontractors only

It is the traveller's responsibility to maintain a current passport that is valid for travel. This may include expiry timeframes (typically 6 months minimum) and blank pages.

The Itad travel team can assist with visa applications for travellers based in the UK through our partner company, however they will not complete applications or attend appointments on the traveller's behalf.

Travellers based outside the UK are responsible for arranging their own visa applications which can then be expensed to Itad, however Itad can assist with advice where possible.

Itad only permit travel on visa's where business activities are allowed. i.e not tourist only visas.

If a traveller has multiple passports, they must inform Itad on which passport they intend to travel.

The processing and application timeframes must be checked when the trip is first proposed, remembering that Consular deadlines are a minimum, may be affected by foreign public holidays, and that transit time must be added, including time involved in the acquisition of required documentation.

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<sup>3</sup> Under no circumstances are employees or consultants to either handle or be in possession of weapons, explosives or ammunition during any travel overseas or project delivery (including when travelling in vehicles or in buildings).

As of 2021 UK nationals travelling to the Schengen zone must have 6 months validity on their passport and must not spend more than 90 days within the EU in any 180 day period. This includes work and personal travel. Travellers will be responsible for keeping track of their European days and notifying the GSS team if they need a visa for a specific European country prior to travel.

EU nationals may also require a visa to enter the UK, this should be discussed with the GSS/ Project team in good time before travel is needed.

**Itad's full travel policy can be made available by asking the relevant Project Officer or contacting [travel@itad.com](mailto:travel@itad.com).**

## Conflict of interest

Itad Suppliers are registered through a rigorous process to ensure they meet Itad's high standards. This includes a declaration to raise any potential business conflicts of interest from the outset. Through our subcontract clauses, our Suppliers are required to sign the conflict of interest declaration and importantly the requirement to report any potential or realised conflicts.

### Policy Statement

This policy sets out the guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest under Itad projects. References to "conflicts" or "conflicts of interest" in this policy include actual and/or potential conflicts of interest

Itad are committed to ethical evaluation and in particular the independence and impartiality of our researchers/evaluators. Where we deliver evaluation services and identify that there is a potential for a conflict of interest, we manage this in an open, transparent and accountable way.

### Definition of Conflict of Interest

A Conflict of Interest is any situation in which an employee or a Supplier's personal interests, may (or may appear to) influence or affect that employee or Supplier's decision-making. 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, and voluntary work or association memberships.

A Conflict of Interest may be:

**Actual:** which involves a direct conflict between a person or organisation's current duties and responsibilities and existing private interests;

**Perceived or Apparent:** which may exist where it could be perceived, or appears that a person or organisation's private interests could improperly influence the performance of their duties - whether or not this is actually the case;

**Potential:** which arises where a person or organisation has private interests that could conflict with their official duties in the future.

It is inevitable that conflicts of interest occur. The issue is not the integrity of the employee or the Supplier concerned but the management of any potential for the employee or Supplier to benefit from the conflict or to be influenced by conflicting loyalties.

Many conflicts can be avoided altogether, but where this is not possible, careful treatment is required, including transparency, declaration, and appropriate authorisation of the decision in question. Even the appearance of a conflict of interest could seriously damage Itad's and the client's reputation and the integrity of projects, so conflicts need to be managed carefully.

It is the potential, rather than the actual benefit or influence from which the conflict of interest arises which requires authorisation. To avoid a breach of trust and to ensure transparency,



authorisation is required where there is the possibility of a benefit or influence. This will avoid accusations or allegations of impropriety, which could in turn have a damaging effect on the reputation of Itad, of the client, and of Itad's projects.

Where an employee or Supplier has a conflict of interest or loyalties on a particular issue, but there is no potential for benefit or influence, it is still necessary for that employee, or Supplier to declare their interest and to take no part in deciding that issue.

### Identifying a conflict of interest

Conflicts may arise in a number of forms:

- direct financial benefit, such as the award of a contract to another organisation in which the individual or organisation has an interest or from which the individual or organisation will receive a financial benefit;
- indirect financial benefit, such as the employment by Itad of a spouse, partner or other family member;
- non-financial benefit or influence, such as:
  - favouring one party over another to increase the individual's standing or influence in any association or society grouping;
  - favouring one party over another to benefit a friend or specific group of people;
  - conflict of loyalties, where an individual's involvement with an outside organisation creates a conflict with their duties to Itad or an Itad project and
  - impairment of an individual's decision-making for example, because of a strong attachment to an individual concerned.

### Managing conflicts of interest on Itad projects

All project team members need to be alert to possible direct or indirect conflicts of interest which they might have and to how they might minimise their effects. A key aspect of minimising the effects of conflicts is to be open and transparent about such situations when they arise. Suppliers are required to declare to the Project Manager any matter that could or be perceived to influence their decisions or actions for the project and to provide all the relevant factors in writing.

Declared conflicts will be escalated as appropriate in order to mitigate the conflict and details may be shared with the client in difficult cases to either clarify or confirm if there is a conflict.

In the event that a potential or actual conflict of interest is declared, where considered applicable, the use of the Brewer and Nash model otherwise known as ethical or "Chinese walls", could be considered to manage the conflict. In such circumstances, arrangements would need to be put in place to restrict the flow of information to ensure that information that is confidential to specific persons is not improperly or inadvertently communicated to another person.

Any failure by an Supplier to declare and register conflicts of interest in accordance with this policy, which are discovered and considered to adversely impact the reputation of Itad or the project could lead to disciplinary action, up to and including termination of contract.

### Reporting

Anyone who suspects that an individual to whom this policy applies has failed to disclose or register a conflict of interest is required to immediately report their suspicions directly to the Project Manager. All disclosures will be treated in strictest confidence. Reports can also be made through [reportingconcerns@itad.com](mailto:reportingconcerns@itad.com).

If working on an FCDO funded project, reports can also be made through [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk) or by calling +44 (0)1355 843747.



We provide expert monitoring, evaluation, learning and strategy services to help build a more equitable and sustainable world for all.

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