

Safeguarding Policy

August 2020



Landell Mills Safeguarding Policy

Landell Mills¹ commits to addressing Safeguarding throughout its work, through the pursuance of three key interventions: Prevention, Reporting and Response.

1. Definitions

Safeguarding is recognised and defined by Landell Mills as “the actions taken to protect and promote the welfare of children and vulnerable adults and staff, enabling them to live and operate, securely, safely and free of, abuse and neglect”.

To assist with this definition, vulnerable adults are defined as: a person, over the age of 18, with a medical condition, long-term disability or illness or impairment that limits their ability to care for or protect themselves.

2. Categories of Abuse

For the purposes of this document and the definition of potential mal-practice, Landell Mills recognises the following five categories of abuse, as defined below:

2.1. Physical Abuse

Physical abuse causes harm to a child, young person or vulnerable adult. It may involve but is not limited to hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury from occurring.

2.2. Neglect

Neglect is the persistent or severe failure to meet a child, young person or vulnerable adult’s basic physical and/or psychological needs. It may result in serious impairment of the child’s health or development.

2.3. Sexual Abuse

Sexual abuse may involve a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child or vulnerable adult to be aware that the activity is sexual, and the apparent consent of the child or vulnerable adult is irrelevant.

2.4. Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill-treatment or rejection. It causes severe and adverse effects on the child, young person or vulnerable adult’s behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

2.5. Financial Abuse

Financial abuse or financial exploitation is the fraudulent or otherwise illegal, unauthorized or improper act or process of an individual, including a caregiver or fiduciary, that uses the resources of a dependent individual for monetary or personal benefit, profit, or gain, or that results in depriving a dependent individual of rightful access to, or use of, benefits, resources, belongings, or assets.

¹ Landell Mills includes all companies within the Landell Mills group.

3. Preventative Behaviours and Expectations

Subject to the above definitions, Landell Mills has a strict code of conduct, and will not tolerate the following behaviour from its employees and/or independent consultants; or from the staff of our partners and suppliers:

- Engaging in sexual relations with anyone who is, under the legal precedents, of the country of specific operations, to be defined as vulnerable or under the legal age of consent. It is not deemed acceptable that sexual abuse (as defined above), exploitation and/or physical mutilation be engaged in (despite local custom) and such circumstances will be dealt with robustly and in accordance with local statutes; they will also be held as matters of gross misconduct under the company's disciplinary policy.
- Emotionally or physically harming a child or vulnerable adult as defined above. Violent or emotional attacks on non-vulnerable individuals will be dealt with in accordance with the company's disciplinary policy.
- Exchanging of project funds, employment, goods, services or preferential treatment for sexual favours.
- Concealing behaviour of others when it is known or thought to be known as a breach of this policy, and that could place others in a position of harm or danger.
- Having inappropriate communications with a child or a vulnerable adult.

4. Reporting

Landell Mills pledges to ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to employees and those we work with.

4.1. The Process

Employees

Employees should raise concerns related to Safeguarding, which do not fall under the grievance policy, with their Line Manager and/or the Safeguarding focal point immediately. Disclosures should be made in writing, as soon as practicable, and safeguarding@landell-mills.com may be used as a point of contact. Please see below for guidance on disclosures and whistleblowing protections.

Where concerns relate to an individual's Line Manager or the Safeguarding focal point, concerns should be raised in the first instance with the Board of Directors and then with the police and/or relevant authority/funding body with whom Landell Mills is working (where Board members may be implicated).

External parties

External bodies, individuals and/or organisations may raise concerns, either as a complaint or as a protected whistleblowing declaration, subject to the nature of the concerns involved.

Please note that, if you have concerns of criminal wrongdoing, or if you believe someone is **in danger or impending risk** that you contact the relevant security/ Police force **immediately**, prior to raising your whistleblowing concerns with Landell Mills.

Should you have a more general complaint and/or concern about behaviour, or practice; please do so, in writing at either of the following addresses:

Managing Director
Landell Mills Limited
Bryer-Ash Business Park,
Trowbridge,
Wiltshire,
BA14 8HE, UK

Managing Director
Landell Mills International Ltd
The Old Station House
15a Main Street
Blackrock
Co. Dublin
Ireland

4.2. Disclosures

Disclosures including reports and/or complaints may be raised with the organisation through a variety of means; including, but not limited to letter, digital communication or verbal dialogue. In each and every circumstance, matters must be handled confidentially and sensitively.

When making a disclosure it is requested that employees:

- Use discretion and seek to do so privately.
- Provide known facts, not conjecture.
- Provide as much detail as possible.
- Where repeating a third party disclosure, use the exact language and wording provided to themselves.
- Use notes from conversations (where repeating disclosures).
- Maintain confidentiality throughout the process (failure to do so may impact upon legal investigations and may be considered by the organisation as a misconduct offence).

Informal discussions and/or rumours should be escalated by employees to a relevant point of contact. Where this option is not immediately available, clear, concise, reflective notes should be made as soon as possible. Please note that any disclosure and associated documentation may be passed to relevant law enforcement bodies.

Upon receiving a disclosure an individual should, without delay, escalate the concerns; this should be in writing (this should in all cases be within 24 hours of a concern being identified), without attempting one's own investigation.

Reports made in writing or verbally should be followed up by completion and submission of the Safeguarding Reporting Form (see Annex 1) as soon as possible. This should be completed as accurately as possible and submitted to either your line manager (employees) or the Safeguarding focal point (employees or external parties) at safeguarding@landell-mills.com.

Please note that all complaints will be investigated and dealt with in the strictest of confidence. You will be updated where possible, though please note that we will be unable to share the detail of internal employee investigations.

4.3. Whistleblowing

If for whatever reason you are concerned about reporting and are not inclined to report to either a line manager, or the Safeguarding focal point as above, it is also possible to report a concern via the Landell Mills whistleblowing mechanism. Any allegations of suspected breaches of our safeguarding policy can be forwarded in confidence to: compliance@landell-mills.com for the attention of Ms Catherine Devlin, Compliance Manager.

4.4. Protection and Support

All those making disclosures in 'good faith' must and will not receive any discrimination, retaliation or victimisation as a result. Behaviour deemed to fall into one of these categories shall be considered

misconduct in line with the group Disciplinary Policy; complaints will be investigated robustly, by an impartial individual, where possible, without prior involvement in the case. An investigation into such behaviours will be completed in a timely manner and sanctions may apply.

Where disclosures are raised in 'good faith', they shall be treated as such in the eventuality of their identification as unfounded; disclosures perceived by the organisation to be vexatious and/or malicious in intent may be dealt with as vexatious grievances, under the group Disciplinary Policy.

Employees retain the right to raise a formal grievance, in writing, in accordance with the Group Grievance Policy, where they feel unsupported and/or victimised following a disclosure.

5. Agreements

Landell Mills pledges and expects associated partners to:

- Strive for the protection of all vulnerable persons impacted by, or in areas impacted by our work
- Commit to the Safeguarding Policy, and to ensure that its employees, independent consultants, and the staff of our partners and suppliers have knowledge of and are committed to the pursuance of this policy.
- Ensure all staff and suppliers are aware of and understand the 'whistleblowing' procedures for the reporting acts perceived to be in breach of this policy.
- Be accountable for all actions and do not use unequal power relationships for personal gain.
- Be prepared to be trained to spot potential signs of sexual misconduct, and to not be afraid to speak up about it if you are suspicious.
- Disclose previous convictions and/or unspent criminal charges/convictions that may be relevant to our work, subject to the statute of limitations and the General Data Protection Regulation (GDPR). Failure to disclose relevant convictions or the completion of a false declaration will be treated as gross misconduct and may result in a legal process.
- Respect and observe both national and international laws regarding the protection of children and vulnerable adults including but not limited to: The Children Act (UK 1989 and 2004); United Nations Convention on the Rights of the Child (1989); the Human Rights Act (1998); Mental Capacity Act (UK 2005); Children First Act (Eire 2015); The Equality Act (UK 2016); and the Adult Safeguarding Bill (Eire 2017).
- Discretely support those raising concerns and/or Whistleblowing.
- Investigate robustly and follow up on all allegations; within the limitations of law, the International Convention on Human Rights and where such an investigation would neither impede nor damage a criminal investigation.
- Consider the breach of this policy by employees, consultants and/or partner firms to be potential cause for the immediate termination by Landell Mills of all and any relationship.
- Continually review practice to ensure that consistency is maintained.
- If you have concerns regarding any of the points above Landell Mills strongly encourages you to raise these, in line with the above reporting procedure.

David Uglow, Managing Director, Landell Mills

Annex 1: Safeguarding Reporting Form

| About you | |
|---|--|
| Name | |
| Contact details (address, email, telephone number) | |
| Role (in relation to Landell Mills) | |
| Nationality | |
| Relationship to vulnerable person | |
| About the vulnerable person | |
| Name | |
| Contact details (address, email, telephone number) | |
| Role in relation to Landell Mills (e.g. beneficiary, staff member) | |
| Age | |
| About the allegation | |
| How did you come to have a concern? | Was abuse observed or suspected? Was an allegation made? Did a vulnerable person disclose abuse?) |
| Date, time and place of any incident(s): | |
| Nature of concern/allegation: | |
| Observations made by you: | (e.g. vulnerable person's emotional state, any physical evidence) Write down exactly – or as precisely as you can remember - what the vulnerable person said and what you said: continue on a separate sheet if necessary. |
| Any other relevant information: | (e.g. disability? language? Were other people involved or aware?) Have you reported the incident to parents or carers of the Vulnerable Person or any other staff in Landell Mills or other external parties? If yes to whom and how. Kindly provide relevant details: What action do you think should be taken by now by the Company? |
| For internal use (by the Safeguarding focal point use only) | |
| Time and date of reporting: | |
| Person(s) to whom report was made: | |
| Advice given: | |
| Action taken: | |