Communication on Progress
2019

United Nations Global Compact
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1. Statement of continued support by the Ecorys UK Managing Director

Ecorys UK Limited is pleased to submit its Communication on Progress (COP) for the period June 2018 – June 2019 and hereby reaffirms its support and commitment to the Ten Principles of the United Nations Global Compact on Human Rights, Labour, Environment and Anti-Corruption.

We continue to commit to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engage in collaborative projects that advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

In accordance with our Letter of Commitment, our Communication on Progress describes our company’s efforts to implement the Ten Principles and provides examples of our work in support of our vision to be a leading international research and consultancy company, addressing society’s key challenges.

We also renew our commitment to report annually on our progress and thereby support public accountability and transparency of our organisation. We shall continue to submit:

- A renewed statement signed by the chief executive expressing continued support for the UN Global Compact and our ongoing commitment to the initiative and its principles.
- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Sincerely yours,

Mr. Darren Jackson
Managing Director
2. Introduction

2.1 About Ecorys UK Limited

Ecorys UK Limited (Ecorys) is an international provider of research, consulting, programme management and communications services. We combine our passion and our business professionalism to make a difference in the world and address society’s key challenges.

Our vision is to be a leading international research and consultancy company, addressing society’s key challenges.

Our mission is to help our clients make decisions, build capacity to implement and communicate change, and deliver bespoke services.

With over 550 employees from over 40 nationalities, speaking over 20 different languages, we provide our clients with valuable support to meet their needs. We have worked in over 150 countries and worked on 5,000 contracts.

We value our independence, our integrity, our partnerships and care about the environment we work and live in. We have an active (Corporate Social Responsibility) CSR programme across our offices, which centres on creating shared value that benefits society and business.

We have five corporate values that shape the way we operate:

- **Caring** - we value our people, our partners and our clients
- **Entrepreneurial** - we value creativity, innovation and excellence in everything we do
- **Integrity** - we value honesty, transparency and seeking to do the right thing
- **Together** - we value team work, collaboration and diversity in all its forms
- **Leadership** - we value our independence, our objectivity, independent thinking and creative problem solving

2.2 Ecorys and the SDGs

We understand that the strategy of the UN Global Compact is to drive business awareness and action in support of achieving the Sustainable Development Goals by 2030. The services that Ecorys delivers contribute to this ambition. Some examples of this contribution are highlighted below:

**SDG 1: End poverty in all its forms everywhere:**

In Bangladesh, we implemented the £83m Economic Empowerment of the Poorest fund on behalf of the UK Government that lifted 1m people out of poverty.

**SDG 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture:**

We are implementing programmes in Zambia and Sri Lanka that seek to build government capacity to implement policies that will promote sustainable agriculture.

**SDG 3: Ensure healthy lives and promote well-being for all at all ages:**

We have undertaken the national evaluation of all 14 Ageing Better projects in the UK, designed to improve well-being of older people.
SDG 5: Achieve gender equality and empower all women and girls:
We have recently designed a programme in Nepal to stimulate women’s economic empowerment.

SDG 6: Ensure availability and sustainable management of water and sanitation for all:
We are implementing a WASH programme in the Solomon Islands that is improving water and sanitation provision.

SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all:
We implement economic development projects that seek to stimulate economic growth and trade around the world. Ongoing work includes projects managing a Business Advisory Facility in Laos and supporting revenue mobilisation in Somaliland and Bangladesh.

SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss:
Through the Civil Society Environment Fund in Zambia we have disbursed grants to CSOs to deliver local level environmental programmes.

SDG 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels:
In Zambia we are strengthening committees of the National Assembly to exercise scrutiny of the national budget.

2.3 About the United Nations Global Compact

The United Nations Global Compact is the world's largest corporate sustainability initiative.

It represents a commitment from companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals. Over 9,500 companies are involved and are based in more than 160 countries, both developed and developing, representing nearly every sector and size.

The ten universally agreed principles are:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;
Principle 8: undertake initiatives to promote greater environmental responsibility; and
Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery
3. Human Rights

3.1 Principles

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights

**Principle 2:** Businesses should make sure that they are not complicit in human rights abuses

3.2 Practical actions

Ecorys UK is committed to upholding human rights both within our company and in the work that we do to make a positive impact on society. We therefore attach great importance to our reputation for conducting business with integrity and fundamentally, with respect to the interests of those our activities may affect. This reputation is an asset, as real as our people and brands. We aim to run a profitable business and that means investing for growth and balancing short term and long-term interests. It also means caring about our customers, employees, shareholders and suppliers, and the communities in which we conduct our operations. In the course of meeting our business objectives, we consider it essential that all employees understand and comply with our values and therefore share the Ecorys UK way of doing things. This includes:

- Conducting business with honesty and integrity and with respect for the interests of our stakeholders
- Complying with the laws and regulations of the countries in which we operate whilst also ensuring that we respect and uphold fundamental human rights conventions and protections
- Ensuring that our compliance teams operate to the highest standards of honesty and transparent behaviour and that these values are engaged in and adhered to across all of our operations
- Ensuring that our employees are recruited employed and promoted on the sole basis of their qualifications and abilities needed for the work to be performed
- Commitment to provide safe and healthy working conditions for our employees worldwide
- Maintaining good communications with our employees through our company communication channels, tolls, and consultations procedures

In reflection of the values and commitments outlined above, we have put in a number of measures into our company practice:

- Ecorys UK believes in operating a fair, objective and legally compliant recruitment process at all times. All employees engaged in the recruitment process must comply with our Equality and Diversity policy. To support disabled candidates, Ecorys UK will always consider making reasonable adjustments to the job description, person specification, selection criteria, and hours of work.
- When recruiting employees we follow a diligent reference process – we check with previous employers to ensure that CVs are accurate.
- Ecorys UK ethical policies are outlined in our Code of Business Ethics and Conduct. Compulsory training is provided to all staff on this Code upon joining, with refresher training every three years.
- Our inductions to new starters includes briefing staff on our policies related to Safeguarding Vulnerable People and Modern Slavery, Health and Safety, and Equality and Diversity. Our Safeguarding Policy makes clear that safeguarding means protecting people’s health, wellbeing and human rights, and enabling
them to live free from harm, abuse and neglect. We reinforce this knowledge through e-learning modules.

- We have an active Works Council that is formed of representatives from all our divisions who meet on a monthly basis. The Works Council provides confidential advice to employees and addresses grievances, which are (confidentially) reported to the Managing Director, Company Secretary and HR Director.

- We have strict safeguards to data collection, processing, and protection of both staff and external candidates’ personal information. These safeguards are set in our GDPR Privacy Notice for Employees and GDPR Privacy Notice for Candidates.

- In 2013 the board of Ecorys UK committed to donating 1% of its annual profits (before tax) to a charity chosen by our employees. Our CSR work is important to us and we are proud to have continued to make this donation every year since. As a result, over the last 5 years we have contributed a total of £55,000 to charity through our corporate donations and our wider fund raising.

These principles and values are also cascaded to our delivery chain partners through our Code of Conduct and associated policies (mentioned above) which form part of our conditions of contract. We undertake due diligence on our delivery chain partners to assess their commitment to high standards in: tax and financial management; prior performance, control and assurance; compliance with the DFID Supplier Code of Conduct; prevention of Modern Slavery; Protection of Vulnerable Persons; Sexual Exploitation and Harassment; Occupational Health and Safety; Membership of the UN Global Compact; Transparency; Conflict of Interest; Data Security; Recruitment and Procurement; and Environmental Safeguards.

3.3 Measurement of outcomes

- Ensuring that all our policies relating to human rights, safeguarding, due diligence, data protection, equality and diversity, code of conduct, and business ethics are included in the induction of our new employees

- Ensuring that all our policies (outlined above) are written in a clear, concise and accessible format

- Regular (at present monthly) meetings of the Works Council and reports to senior management on views, measures, and progress on actions

- Ensuring that our staff are kept up to date with human rights legislation through e-learning

- Regular reporting by the Works Council to our employees on views, measures and progress on actions

- Maintaining a strong due diligence process through scrutiny of responses to our Business Partner Questionnaire.
4. **Labour**

4.1 **Principles**

- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labour;
- **Principle 5:** the effective abolition of child labour;
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.

4.2 **Practical actions**

Ecorys UK ensures that the views of our staff are represented through a number of means including an annual (anonymous) Employee Engagement Survey, but principally through our Work’s Council. The Ecorys UK Works Council is a group of up to seven employee representatives. Its role is to provide an interface between management and staff through representing staff in discussions with management regarding proposed changes to company policy and operational issues and raising issues with management on behalf of staff. The Works Council carries out the following tasks:

- Offering staff the opportunity to raise issues in confidence which the Works Council will then raise with management on their behalf.
- Meeting with Ecorys UK Management every two months and having additional discussions with management as necessary.
- Providing feedback to staff via team meetings and individual contact as appropriate.

The Works Council enables us to ensure that our employees have a voice and that they have a stake in determining company policy and improving our practice.

Additionally, we maintain a wide set of policies that underpin a safe and trusted environment for our staff, partners and beneficiaries. This commitment includes our support of the Modern Slavery Act 2015 in all parts of our business services. We have a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to ensuring that modern slavery and human trafficking do not take place within our business or supply chain.

In accordance with this, we have issued the following Policy Statement to our employees and stakeholders:
Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

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

Ecorys UK will:

- Support our staff to be aware of the risks of human trafficking and modern slavery and to act appropriately when any such risk is detected;
- Conduct due diligence on business partners within our supplier chain;
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the appropriate authorities;
- Encourage workers to report cases of third party labour exploitation, provide the means to do so and investigate and act on reports appropriately;
- Positively encourage and support employees and contractors to report such exploitation, which may be occurring within their communities. Points of reference include Line Managers, the Group Compliance Officer and avenues outlined in the Ecorys Whistleblowing Policy;

Ecorys UK accepts that job-finding fees are a business cost and will not allow these to be paid by job applicants;

As appropriate, designate managers to attend training on the prevention of labour exploitation who will have responsibility for developing and operating company procedures.

Ecorys UK is fully committed to providing Equal Opportunities and encouraging a diverse workforce, based on the ‘Protected Characteristics’ outlined in the Equality Act 2010. We have developed an **Equality and Diversity Policy** to assist the company in putting its commitment and values into practice and is provided to all employees when they join the company. Compliance with this policy is also intended to ensure that employees (particularly those involved in recruitment) do not commit unlawful acts of discrimination.

We strive to ensure that the work environment is free from harassment and bullying and that everyone is treated with dignity and respect. This is an important aspect of ensuring Equality, Diversity and Dignity in the workplace and in all aspects of employment. We apply this policy to the process of recruitment and selection, promotion, training, conditions of work, pay and benefits and to every other aspect of employment, including general treatment at work and the processes involved in the termination of employment. The policy also applies to employees, agency workers, suppliers and freelance workers. We ensure that members of our supply chain are made aware of this policy when prior to engaging with them.

Equal Opportunities means that we will never discriminate on the grounds of Age, Disability, Sex, Gender reassignment, Pregnancy, Maternity, Race (which includes colour, nationality and ethnic or national origins), Sexual orientation, Religion or belief because someone is married or in a civil partnership; which are referred to as “Protected Characteristics”.

Diversity means that Ecorys UK welcomes people from all sections of society into the workplace and will endeavour to ensure that it is free from bullying and harassment. We strive to create a working environment free from bullying, harassment, victimisation and unlawful discrimination promoting dignity and respect for
all. Ecorys UK provides training in Equality & Diversity for employees to help them understand their rights and responsibilities and to help create a working environment free of bullying and harassment. We have also put in a Grievance Policy to put these protections into place ensuring that:

- The company avoids unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.
- All employees, visitors, contractors or agency workers are free from bullying and harassment on any ground, and will know that complaints of this type will be dealt with promptly in line with the Ecorys UK Grievance Policy. We have clear levels of complaint escalation.

We have recently reviewed the Gender Pay Gap in Ecorys UK and we are working with our staff to ensure that disparities are addressed.

Ecorys UK is committed to ensuring that children and vulnerable adults that we come into contact with during the course of our work are protected. Our policy on safeguarding is about protecting certain people who may be in vulnerable circumstances. A child is defined as someone who has not yet reached his or her 18th birthday. We understand safeguarding and welfare of children as:

- protecting children from maltreatment;
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

A vulnerable adult or ‘Adult at risk’ is defined as someone with care and support needs who is at risk from abuse or neglect. We intend to ensure a common understanding of safeguarding issues and to ensure that we embed good practice across the diverse and complex areas in which we operate and enhance accountability in this crucial aspect of our work.

We require all organisations and individuals working with, or on behalf of Ecorys UK, whether in the UK or overseas, as partners, or sub-contractors to be familiar with and comply with this policy. Whilst it is recognised that local legislation may vary from country to country, our policy identifies our minimum standards, is based on UK legislation, and may exceed the requirements of local legislation.

Ecorys UK is committed to protecting people who may be unable to protect themselves against significant harm or exploitation. We take all appropriate steps to ensure that all employees are provided with support to deal with potentially challenging concerns and issues concerning safeguarding, including the following actions:

- We will undertake appropriate criminal record checks to prevent unsuitable employees working with children and vulnerable adults.
- All Ecorys UK employees who come into contact with children and vulnerable adults will have training in handling a disclosure, reporting an allegation, confidentiality, code of practice and code of behaviour. These will include online training tools and induction processes. Existing employees will be made aware of the policy, procedures and guidance.
- We will ensure that all employees who have contact with Children and vulnerable adults familiarise themselves with the Code of Practice and guidance notes provided under our Safeguarding Policy.
- We will ensure that no research involving, or otherwise engaging, children and vulnerable adults may be carried out without the approval of the Project Director.

We will appoint a Designated Safeguarding Officer (DSO) to receive and record information about allegations or suspicions of abuse, reported by employees who have safeguarding concerns. The DSO will assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate. The DSO will consult initially with the statutory safeguarding agencies to discuss their
concerns and will make a formal referral to a statutory children and vulnerable adults safeguarding agency, the police or local law enforcement agency.

4.3 Measurement of Outcomes

- Monitoring the Ecorys UK Equality and Diversity Policy periodically by the Company to judge its effectiveness and will be updated in accordance with the law.
- Monitoring the ethnic, gender and age composition of the existing workforce and the number of people with disabilities within these groups, and reviewing its policy in accordance with the results shown by the monitoring. If changes are required, the Company will implement them.
- Undertaking regular training of our staff on safeguarding, prevention of modern slavery and health and safety through e-learning modules.
- Publishing our 2019 Gender Pay Gap statement on our website. We are working to improve the gender balance through the following initiatives:
  - Introducing competency behavioural interviewing techniques to ensure our process is free from unconscious bias.
  - Running a series of workshops with employees to identify any perceived barriers to promotion for women.
  - Engaging with the Works Council and the Board to discuss any issues that may affect the promotion of women.
  - Analysing past promotions across all business units to determine any potential obstacles that could affect future promotions.
5. Environment

5.1 Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges;
Principle 8: undertake initiatives to promote greater environmental responsibility
Principle 9: encourage the development and diffusion of environmentally friendly technologies.

5.2 Practical actions

At Ecorys UK we are committed to seeking opportunities to reduce our environmental impact by organising our operations in a sustainable manner. In light of this we have developed and rolled out an Environmental Policy. In accordance with this policy, we will publish an annual Environmental Performance Report.

We conform to our compliance obligations by meeting or exceeding the environmental requirements of legislation, regulation and our adopted standards. This includes

- Complying with all relevant environmental legislation.
- Implementing a training programme for our employees to raise their awareness of our policy, procedures and environmental issues and enlist their support in improving our company’s performance.
- Encouraging the adoption of similar principles by our suppliers.
- Anticipating environmental issues and taking appropriate actions, which may precede laws or regulations to reduce our impact on the environment in all aspects of our environmental performance.
- Reviewing and auditing our own operations on a regular basis to identify strengths and weaknesses in our environmental approach.
- Supporting sustainable development, the responsible use of natural resources and energy conservation. We will consider potential environmental impact during all relevant business decisions.
- Promoting programmes of waste minimisation and pollution prevention, including recycling
- Minimising energy wastage by promoting the efficient use of energy, water and other resources
- Reducing our carbon footprint.
- Committing to continual improvement in all aspects of our environmental performance

Our precautionary approach to environmental challenges includes ensuring a safe working environment for our employees. Ecorys UK recognises the importance of health and safety in the workplace and its duty to all employees, visitors, contractors and subcontractors under the Health and Safety at Work etc. Act 1974.

Ecorys UK recognises and accepts its responsibilities as an employer under the general provisions of the Act, which imposes a duty on all employers to ensure, so far as is reasonably practicable, the health, safety and welfare of their employees at work. The Act also requires that employers ensure the safety of all other persons, who, though not employees, may be affected by their activities. To this end, we will:

- Provide adequate control of the health and safety risks arising from its work activities and maintain safe, appropriate equipment and systems of work and also ensure the safe handling and use of materials and substances;
- Consult with employees and others as appropriate, on matters affecting their health and safety;
• Provide information, instruction and supervision for employees and sub-contractors;
• Ensure that all employees and sub-contractors are competent to do their tasks by ensuring adequate training is provided;
• Allocate responsibilities and adequate resources for the implementation of the Policy;
• Review and report on the implementation of the Policy to achieve continual improvement in the company’s health and safety performance.

Our environmental and health and safety policies are communicated to all of our employees, suppliers and sub-contractors and is made available to the public. All our personnel understand their obligations under these policy statements, and will review these policies on an annual basis.

5.3 Measurement of Outcomes

• Publishing an annual Environmental Performance Report, outlining our progress in reducing our environmental impact.
• Ensuring that our staff are trained on environmental safeguarding and health and safety in the workplace through e-learning modules.
• Ensuring that recycling is promoted in our offices through clearly labelled bins separating recyclables from general waste.
• Monitoring energy use in our offices through comparing bills and statements.
6. **Anti-Corruption**

6.1 **Principles**

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

6.2 **Practical Actions**

It is the policy of Ecorys UK to conduct all of our business in an honest and ethical manner. This is codified in our Anti-Corruption and Bribery Policy. We do not tolerate any bribery or corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; together with implementing and enforcing effective systems to counteract bribery. Our policy covers bribes, gifts and hospitality, facilitation payments and “kick-backs” and political donations. Our policy is designed to uphold the requirements of United Kingdom (UK) legislation, principally The Bribery Act 2010 which came in to force in July 2011.

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

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

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

- Country risks in relation to our International Development Unit, and Programme Management and Communications operations
- Business opportunity risk due to the number of experts, associates and contractors with whom we work
- Business partnership risks in respect of partnership arrangements including consortia and joint ventures

Our Board of Directors have overall responsibility for ensuring that our Anti-Corruption and Bribery Policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Board of Directors have delegated to the Finance Director and Company Secretary, acting as a “Compliance Officer”, the primary and day-to-day responsibility for this policy, its implementation and monitoring its use and effectiveness in dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are appropriately trained on the policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us including our suppliers. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Our staff and suppliers are made aware that we reserve our right to terminate our contractual relationship with workers or sub-contractors if they breach this policy and compliance with this policy is in our standard terms and conditions for contractual relationships.
Training on this policy forms part of the induction process for all new employees. All existing employees receive relevant training on how to implement and adhere to this policy. Our zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. We therefore apply a test in all circumstances to determine whether the gift is reasonable and justifiable. Matters of doubt are referred to the Compliance Officer before acceptance.

6.3 Measurement of Outcomes

- Monitoring (by the Compliance Officer) the effectiveness of the implementation of our Anti-Corruption and Bribery Policy, regularly considering its suitability, adequacy and effectiveness.
- Regularly reviewing our internal control systems and procedures to provide assurance that they are effective in countering bribery and corruption.
- Ensuring that all employees and workers know that they are responsible for the success of the policy and ensuring that everyone understands the importance of working against all forms of corruption, through training and awareness-raising sessions, sharing and creating social media content on the issue.
- Ensuring that our due diligence process mitigates risks related to all forms of corruption.
- Ensuring that reporting and whistleblowing procedures relating to fraud, bribery and corruption will be dealt with in an effective and confidential manner.