

<b>Policy Number</b>	<b>Effective Date</b>	February 2025
AKFA-POL_005	<b>Next Review Date</b>	September 2026
	<b>Sponsor(s)</b>	Global Safeguarding Lead Country Director
	<b>Approval/Authorisation</b>	Board

## 1. AKF Australia's Safeguarding Commitment

AKF Australia is committed to respectful relations with and between all staff, associates, beneficiaries and wider communities with whom it works, and takes all reasonable measures to prevent harm, including all forms of exploitation, abuse, bullying, harassment and abuse of power that may arise from contact with its staff, programmes or operations.

AKF Australia defines safeguarding as the responsibility to make sure all who come into contact with AKF staff, operations and programmes, including those who work in or with AKF, are protected from harm. This term covers physical, emotional harm and neglect as well as sexual exploitation, abuse and harassment.<sup>1</sup>

## 2. Purpose

The purpose of this policy is to protect staff from specific forms of harm, or workplace violence, that might take place, or be experienced, within the workplace. This includes discrimination, bullying and harassment. This policy should be used in **conjunction with** AKF Australia's overarching Safeguarding Policy and AKF Australia Staff handbook.

Specific policies are in place to safeguard staff from sexual exploitation, abuse and harassment.

### I. Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

This policy protects people who come into contact with AKF Australia, including staff, from sexual exploitation abuse and harassment by AKF Australia staff and associated personnel.

Discrimination, bullying and sexual harassment are unacceptable at AKF Australia and are unlawful under the following legislation:

- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth).
- The Equal Opportunity Act 2010 (Vic)

**AKF defines discrimination, bullying and harassment as follows:**

<sup>1</sup> AKF does not make judgement against individuals who participate in selling sex ("transactional sex"), however, AKF has banned buying sex in order to prevent sexual exploitation and abuse from occurring.

## 1. Discrimination

When a staff member, potential staff member, or other worker has been treated differently because of their gender, sexual orientation, marital status, race, colour, descent, ethnicity, age, religion, national origin, physical or mental ability, military status, pregnancy status, breastfeeding and family or carer's responsibilities, political opinion, trade union membership and non-membership of a trade union.

Discrimination includes any situation when a person or group of people are treated less favourably than another person or group because of their background or certain personal characteristics described here, and the employer has taken adverse action in the following ways (but not limited to):

- Refusing employment to a potential employee
- Dismissing an employee
- Giving less favourable terms and working conditions
- Selected for redundancy on the basis of these characteristics
- Prevented from accessing training opportunities
- Denied promotions, allowances, or other employment benefits

## 2. Bullying:

Rude, abusive, or threatening behaviour or misuse of power that intends to make a person feel humiliated or ashamed.

The use of force, coercion, hurtful teasing or threat, to abuse, aggressively dominate or intimidate. The behaviour is often repeated and habitual. One essential prerequisite is the perception (by the bully or by others) of an imbalance of power. This imbalance distinguishes bullying from conflict. All people must be treated with dignity and respect.

## 3. Harassment:

When bullying happens because of a person's identity, or who they are such as their age, gender, race, ethnicity, disability, religion, sexual identity, etc. Harassment is considered a workplace issue and can include stalking or cyberstalking of a staff member by a colleague conduct that is based on race, color, religion, sex, gender, sexual orientation, national origin, older age (beginning at age 40), disability, or genetic information (including family medical history).

Harassment becomes unlawful when:

- enduring the offensive conduct becomes a condition of continued employment
- the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Anti-discrimination laws also prohibit harassment against individuals in retaliation for filing a discrimination charge, testifying, or participating in any way in an investigation, proceeding, or lawsuit under these laws; or opposing employment practices that they reasonably believe discriminate against individuals, in violation of these laws. Where this policy is more stringent than local legislation, this policy will apply.

### 3. Scope

This policy applies to all AKF Australia personnel and stakeholders, including permanent and temporary staff, Board Directors, external service providers, contractors and consultants, interns, researchers, volunteers, and visitors—such as journalists, photographers, donors, staff from other AKF units or AKDN agencies, and representatives of other organisations. It also applies to implementing or other partners unless they maintain their own safeguarding policy of a similar or higher standard.

AKF Australia requires all staff, volunteers and representatives to commit in writing to upholding the principles and standards in this Safeguarding Adults at Risk Policy and the associated Code of Conduct, through a Statement of Commitment (Annex 1).

Partner commitments will be reflected in specific clauses in their written agreements with AKF Australia. (see Annex II for examples of these). A separate Code of Conduct for Visitors (see sample at Annex IV) will apply to all visitors.

### 4. Safeguarding Standards:

- Standard 1** AKF Australia will ensure a workplace culture built on respect, that delivers a safe and inclusive environment for all staff.
- Standard 2** AKF Australia's safeguarding policy commitments are integrated into existing organizational processes and systems and, where necessary, new procedures will be introduced.
- Standard 3** AKF Australia has measures and mechanisms in place for monitoring and reviewing safeguarding measures and for both upward and downward accountability in relation to safeguarding.
- Standard 4** Everyone connected with the organisation has the knowledge, attitude and skills to keep children and adults safe.
- Standard 5** AKF Australia staff are aware of the organisation's commitment to their safety and wellbeing in the workplace and feel able to raise concerns in the knowledge that they will be taken seriously.
- Standard 6** Children and families understand AKF Australia commitments to safeguarding and know what to do if concerns arise. AKF Australia responds appropriately to safeguarding concerns.
- Standard 7** Partners have safeguarding measures in place, which are consistent with AKF Australia's standards
- Standard 8** AKF Australia will ensure robust protection for anyone who raises a concern or makes a complaint regarding breach of safeguarding policy.

## 5. Policy Statement

The Safeguarding Policy details obligations, responsibilities and commitments made by AKF Australia, staff, managers and the Board Directors, along with the consequences of non-compliance.

**AKF Australia will ensure that the following measures are in place specifically to safeguard adults at risk:**

- Staff will follow the guidelines on prohibited conduct below
- Support staff to recognize and appreciate different working styles and perspectives
- Create workplace environments where everyone can contribute to open communication and information sharing
- Define management competencies which include allocating duties fairly, setting clear expectations and realistic deadlines, providing constructive, regular, and reasonable performance guidance, fostering teamwork and rewarding collaborative behaviour.

**Guidelines on conduct prohibited under this policy:**

- Derogatory remarks, slurs, accusations, or negative stereotyping and microaggression, using a person as the butt of jokes; abusive and offensive remarks, or depicting harassers as victims or victims as complainers
- Unwelcome comments about appearance
- Graphic materials, derogatory posters, cartoons, or drawings; whether physical or online
- Communicating a wish, intent, or threat to hurt employees or visitors all forms of physical assault which entails inflicting bodily harm on any person at any time and in any place or damaging a person's work area or property; physical interference with normal work or movement which is directed at an individual
- Arguing frequently with, being belligerent or derogatory towards, or repeatedly swearing at; or making or sending derogatory, violent, intimidating, or inappropriately aggressive written, verbal, social media, or visual communications to employees

## 6. Reporting

**What to do if you have a safeguarding concern**

**If the concern relates to a child under 18, you should report the concern in confidence immediately to the relevant authorities or through one of the routes**

**Options for reporting**

You can remain anonymous if you wish.

### 1. LINE MANAGER/ SAFEGUARDING FOCAL POINT

Speak to your **line manager, Safeguarding Manager/Focal Point or other designated person** (for more details on all available Speak Up channels please refer to Annex 2) as soon as possible. You do not need to have all the facts or details. This will ensure that the matter is addressed promptly before it becomes a more serious problem.

**The Safeguarding Focal Point for AKF Australia is Afshin Ghassemi**

**Contact details:** Email: [afshin.ghassmi@akdn.org](mailto:afshin.ghassmi@akdn.org)

Mob: +61 (0) 432 178 039

## 2. SENIOR MANAGER

If you are uncomfortable speaking to one of these individuals, or if you believe that the person is implicated in the concern, or you have reported the concern previously and it was not taken seriously, you have the right to raise it to any other staff member, such as a senior manager or the Global Safeguarding Lead, or a member of the HR Team.

If you wish, you may contact **AKF's Global Safeguarding Lead, AKF's Global Director of Operations**, and/or **AKDN's HR Director & AKF Human Resources Committee Board member** (see Annex 4 for details)

## 3. SAFECALL SPEAK UP SERVICE

You can also use the Safecall 'speaking up' hotline or web platform, which is an external, independent service provider available for AKFA staff. This service is available 24 hours a day and you can talk to someone in your own language. The call handlers will take details of your concern and then pass this on to AKF Geneva (Head Office). You can remain completely anonymous if you wish.

See more details here: <https://www.safecall.co.uk/>

**24/7 Hotline number (Australia): 1 800 312 928**

**Web portal: <https://www.safecall.co.uk/file-a-report/>**

## 4. LOCAL AUTHORITIES

If your concern relates to a potential breach of the law, you can also refer directly to the relevant local authorities. If the report alleges criminal activity, you may also refer the report to the relevant local authorities, if it is safe to do so. Referral must be safe for all concerned, particularly the survivor, and therefore AKF Australia may wish to undertake a risk assessment before referring to local authorities. The survivor's consent must be sought for a referral to take place, unless they are a child under the age of 18, in which case the best interests of the child takes precedence.

Refer to the AKF Australia Whistleblower policy for further details.

AKF Australia will also accept complaints/ safeguarding reports about incidents caused by the organisation or its representative from external sources such as members of the public, partners and official bodies.

## What will happen?

1. AKF Australia will take all complaints that are raised seriously and will handle them in a consistent, timely and fair manner
2. AKF Australia will take appropriate steps to ensure there is no retaliation against an employee who raises a complaint/speaks up.
3. AKF Australia will deal with all complaints confidentially and all those involved will be expected to keep their involvement and all details relating to the complaint confidential.
4. Employees who wish to report cases of sexual harassment will have their case considered by male or female staff representatives at all points in the process.

**Staff and volunteers in all countries have a right to access AKF’s Employees Assistance Programme. Please refer to the AKF Australia Staff Handbook for details for such assistance.**

## 7. Related documents

- AKFA Code of Conduct
- AKFA PSEAH Policy
- AKFA Safeguarding Policy\_2025
- AKFA Safeguarding Children and Young People Policy\_2025
- AKF Gender Equality Policy
- AKFA Disability and inclusion policy
- AKFA Whistleblower Policy
- AKFA Staff Handbook

## 8. References

- OECD DAC Recommendations on PSEAH
- Inter-Agency Standing Committee (IASC) Principles and Standards for PSEA
- The UN Convention on the Elimination of all Forms of Discrimination Against Women
- The UN Convention on the Rights of the Child
- ILO Convention 190 (2019) on Eliminating Violence and Harassment in the World of Work
- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- ACFID Code of Conduct

## 9. Revision History

AKF Australia will review and update this policy every three years, unless changes are required earlier, to ensure relevance and applicability.

Date	Revision Number	Change(s)	Reference Section(s)
25 <sup>th</sup> September 2025	1	New Policy	

## Annexe 1: Statement of Commitment

This Statement of Commitment to Aga Khan Foundation Australia's Anti-Discrimination, Bully and Harassment Policy must be signed by all AKF Australia staff and representatives, as defined in this policy.

I \_\_\_\_\_, have received, read and understood the contents of the AKF Australia's Anti-Discrimination, Bully and Harassment Policy.

By signing below, I acknowledge my commitment to uphold the principles outlined in this Policy. I understand that breaching this policy is considered a serious offence and carries with it disciplinary action, including possible termination, and if criminal activity is suspected, reporting to the relevant authorities.

I understand that my actions reflect AKF Australia's values and contribute to a safe, ethical, and respectful workplace for all. I understand that this policy applies 24 hours a day.

I understand that in the event of any changes or updates to this Statement, I will be required to re-sign it.

Name (printed)

Date

Designation/Role

Signature

## Annex 2: Speak Up Contact details

### AKF Global Safeguarding Lead

Ms. Kasia Bartman

[Katarzyna.bartman@akdn.org](mailto:Katarzyna.bartman@akdn.org)

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Mob. +41 787152695

### Global Director of Operations

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Tel. +41 229097339

Mob. +41 792011484

### AKDN HR Director & AKF Human Resources Committee member

Ms. Shams Jaffer

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Mob. +33 675077437

### SAFECALL

<https://www.safecall.co.uk/file-a-report/>

Tel (Australia): 1800 312928

For other numbers: <https://www.safecall.co.uk/file-a-report/telephone-numbers/>