



Policy Number	Effective Date	February 2025
AKFA-POL_004	Next Review Date	September 2026
	Sponsor(s)	Global Safeguarding Lead Country Director
	Approval/Authorisation	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 ensure that all individuals who come into contact with AKF Australia staff, operations and programmes, including those who work in or with AKF Australia, are protected from harm. This term covers physical, emotional harm and neglect as well as sexual exploitation, abuse and harassment.¹

AKF Australia's programmes can put our staff in a position of relative power over communities we seek to assist. This power imbalance can be amplified by other intersecting factors such as living with disability, age, SOGIE (sexual orientation or gender identity), and ethnic heritage. Unfortunately, some individuals may use this position of power to sexually exploit, abuse or harass people they come into contact with.

AKF Australia defines Protection from sexual abuse, exploitation, harassment (PSEAH) as measures taken to protect people from sexual exploitation, abuse and harassment by their own staff and associated personnel. This policy lays out the commitments made by AKF on protection from sexual exploitation, abuse and harassment.

AKF is committed to ensuring procedural fairness to all parties involved and ensuring a survivors rights are respected. Our work is underpinned by a 'do no harm' approach and we recognise the vulnerabilities and needs of those who may be victims/survivors of SEAH. Towards this our approach aims to:

- Treat the victim/survivor with dignity and respect
- Actively involve the victim/survivor in decision making
- Provide the victim/survivor with comprehensive information
- Protect privacy and confidentiality
- Not discriminate based on race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies and
- Consider the need for counselling and health services to assist the victim/survivor with their recovery.

¹ AKF does not make judgment 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.



2. Purpose

The purpose of this policy is to protect people from sexual exploitation, abuse and harassment that may be caused due to their coming into contact with AKF staff, associated personnel or programmes and activities, and to detect and respond appropriately to sexual exploitation, abuse and harassment cases. This policy should be used in **conjunction with** AKF's overarching Safeguarding Policy.

This policy covers sexual exploitation, abuse and harassment of anyone with whom AKF staff come into contact, including other staff members.

All people must be treated with dignity and respect. There is zero tolerance for sexual abuse, exploitation, harassment (PSEAH), neglect or other misconduct by AKF Australia staff, representatives or partners.

AKF Australia has also put in place specific additional policies to apply for the:

I. **Safeguarding Children and Young People Policy**

This policy protects children and young people from harm caused by AKF Australia staff, associated personnel, and programme design and delivery.

II. **Safeguarding Adults at Risk Policy**

This policy protects adults who come into contact with AKF Australia and may be at risk of harm (including programme beneficiaries and adults in the wider communities where AKF Australia works) from harm caused by AKF Australia staff, associated personnel, and programme design and delivery.

III. **Anti-Discrimination Bullying and Harassment Policy**

This policy protects staff and others working in AKF Australia from specific forms of harm in the workplace which is defined as discrimination, bullying and harassment.

AKF defines sexual exploitation, abuse and harassment as follows:

- i. **Sexual abuse** – an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Any sexual contact with children under the age of 18 is considered abuse.
- ii. **Sexual exploitation** – any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- iii. **Sexual harassment** - A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating.



Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

a. Verbal and non-verbal Sexual Harassment

- i. Comments on a person's appearance, age, private life, or demeaning references and disparaging remarks about one's gender or physical appearance
- ii. Sexual comments, stories, jokes, propositions, lewd remarks, demands for sex,
- iii. Sexual advances; requests or demands for sex or repeated unwanted requests to go out on dates after prior refusal;
- iv. Repeated and unwanted social invitations for dates or physical intimacy;
- v. Insults based on the sex of the person; heckling, teasing or name calling, and verbal sexual abuse disguised as humour;
- vi. Condescending or paternalistic remarks of a sexual nature;
- vii. Demands for sexual favours and threats of firing if the demands are not met;
- viii. Obscene communication and sexual innuendos;
- ix. Sending sexually explicit messages (by phone or by email)
- x. Sex-based harassment e.g. harassment that relates to the sex of the target but is not necessarily sexual in nature
- xi. Display of sexually explicit or suggestive material;
- xii. Sexually-suggestive gestures or inappropriate advances including on social networking sites;
- xiii. Leering/staring at a person or parts of their body in a sexually suggestive manner;
- xiv. Whistling in a suggestive or derogatory way

b. Physical Sexual Harassment

- i. Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fiddling, fondling, any inappropriate touching and includes lifting up of skirts/dresses, shirt, flickering bra straps or putting hands in a person's pockets.
- ii. Physical violence, including attempted or actual sexual assault or coercion of any kind; indecent exposure of genitalia;
- iii. Blocking the victim's path in an aggressive way; standing very close to the victim; rubbing genitals on a person; stalking with an intention to sexually harass the victim; massaging a person without invitation;
- iv. The use of job-related threats or rewards to solicit sexual favours.

Some examples of sexual exploitation, abuse and harassment are:

- Asking for sex in return for providing humanitarian, development or protection assistance
- Sexual activity with children under the age of 18
- Asking for sex in return for proving employment
- Sexual harassment in the workplace
- Sexual assault



- Trafficking individuals for the purpose of sexual exploitation
- iv. **Survivor** - A person who has SEAH perpetrated against him/her/them or an attempt to perpetrate SEA against him/her/them.

AKF Australia will respond to reports of sexual exploitation, abuse or harassment from any time period - there is no statute of limitations for SEAH cases. AKF will accept anonymous safeguarding reports. 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, Board directors, volunteers and consultants to commit in writing to upholding the principles and standards in this Safeguarding Policy and the associated Code of Conduct, through a Statement of Commitment (in Annex I).

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, staff and managers, along with the consequences of non-compliance.

AKF Australia is committed to ensuring

- Acceptable standards of conduct are observed at all times. This policy applies 24 hours a day.
- AKF programmes and operations are designed and implemented in a way that does not increase risk of SEAH
- Communities and staff are enabled to report SEAH concerns through safe, appropriate, accessible means
- Reports of sexual exploitation, abuse, and harassment are treated seriously
- Reports are attended to promptly and confidentially and are investigated impartially
- Complainants and witnesses are not victimized in any way
- Learning is fed back into the organization to ensure continuous improvement

Our staff must NOT

- NOT Sexually exploit, abuse or harass anyone they come into contact with as a result of their work with AKF
- NOT Engage in sexual activity with a child under the age of 18. Mistaken belief regarding the age of the child is not a defence
- NOT Exchange money, offers of employment, employment, goods, or services for sex, including sexual favours and other forms of humiliating, degrading or exploitative behaviour by AKF employees, volunteers and associates is prohibited at all times. This includes any exchange of assistance that is due to beneficiaries/ programme participants.²
- NOT Engage in any sexual relationship with a person benefitting from AKF assistance or protection
- NOT Perpetrate sexual exploitation, abuse or harassment in any areas of their life. This may include (but is not limited to) involvement in human trafficking, practicing FGM (female genital mutilation), perpetrating forced or early marriage, intimate partner violence, elder abuse

We recognise that our staff, volunteers, associates sometimes live in communities where AKF operates. On rare occasions, romantic relationships may develop that may be seen as acceptable in

² AKF does not make judgment 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.



the community but that would also breach this policy. We expect any staff/volunteers/associates to make it known immediately to their HR of any potentially compromising relationship they are in or considering that might involve a beneficiary, so that appropriate steps can be taken to eliminate or mitigate any risks.

Our staff will

- Abide by the AKF Australia Code of Conduct
- Comply with all relevant Australian laws
- Remain alert to safeguarding risks and ensure familiarity with safeguarding policies
- Take all suspicions and/or allegations of abuse or risk seriously and respond swiftly in accordance with this policy. This includes taking seriously any allegations made against an adult working or volunteering with children or an adult at risk
- Share information appropriately
- Attend safeguarding training
- Escalate matters of concern as required and be alert to our Speak Up policy

Consequences of Non-Compliance

Staff, volunteers and other associates: for staff, disciplinary action up to and including termination of contract, and for others, an end to the relationship either through termination of contract or ending of the agreement/arrangement that covers their association with AKF.

Visitors and Partners: up to and including termination of all relations including contractual and partnership agreements with AKF.

Appropriate legal and other actions may be taken for breaches or non-compliance. This may include referral to Australian Federal Police, where appropriate.

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

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 Safeguarding Policy_2025
- AKFA Safeguarding Children and Young People Policy_2025
- AKFA Anti-Discrimination Bullying and Harassment Policy
- 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
- Privacy Act 1988
- 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
- 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)
February 2025	1	New Policy	



Annexe 1: Safeguarding Statement of Commitment

This Statement of Commitment to Aga Khan Foundation Australia's Protection from Sexual Abuse, Exploitation, Harassment (PSEAH) 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 PSEAH 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

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Tel. +41 229097226

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Global Director of Operations

Mr. Tom Austin

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AKDN HR Director & AKF Human Resources Committee member

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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/>