



Policy Number	Effective Date	February 2025
AKFA-POL_002	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. AKF Australia is committed to ensuring the identification, mitigation and management of a wide range of risks to:

- **Programme participants and wider communities** - AKF Australia makes every effort to ensure the safety and protection of individuals and groups, including children and adults with whom it is in contact, particularly those that may be especially vulnerable and at risk.
- **Staff, volunteers and other associates** - AKF Australia seeks to establish safe and respectful workplaces that ensure the inherent dignity of all persons, where everyone is treated with dignity and respect, in safe environments free from discrimination, bullying, harassment and other forms of abuse.
- **The organisation** - AKF Australia must preserve its reputation for good governance and sound management by addressing reputational and fiduciary risks such as Fraud, Theft, Bribery and Corruption, Money Laundering and Aid Diversion.

2. Purpose

The purpose of this policy is to protect people from any harm that may be caused due to their coming into contact with AKF Australia staff, associated personnel or programmes and activities, and to detect and respond appropriately to safeguarding cases.

AKF Australia work is based on the principles of international conventions and instruments, including the United Nations Convention on the Rights of the Child (UNCRC), Convention on the Elimination of Discrimination Against Women (CEDAW), the Convention on the Rights of Persons with Disabilities (UNCRPD) and Universal Declaration of Human Rights.

AKF Australia's safeguarding policy is in line with international standards and recommendations such as the CHS Alliance Core Humanitarian Standard, OECD DAC Recommendations on PSEAH and the ACFID Code of Conduct.



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 policies for specific forms of harm or to safeguard specific groups. These are:

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.

II. 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.

III. 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.

IV. 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.

V. AKF AUSTRALIA Communications and Content Gathering Ethics Policy

This policy ensures that AKF Australia's content gathering, and communications are ethical and safe for all involved.

AKF Australia will respond to safeguarding reports from any time period – there is no statute of limitations for safeguarding cases. AKF Australia 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 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 and Code of Conduct details obligations, responsibilities and commitments made by AKF Australia, staff, managers and the Board Directors, 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 Australia programmes and operations are designed and implemented in a way that does not cause harm increase risk of harm.



- Communities and staff are enabled to report safeguarding concerns through safe, appropriate, accessible means.
- Safeguarding reports are treated seriously.
- Complaints and reports are attended to promptly and confidentially and are investigated impartially.
- Action is taken to ensure that misconduct does not continue.
- Complainants and witnesses are not victimized in any way.
- Learning is fed back into the organisation to ensure continuous improvement.

Our staff must NOT

- Cause harm to those they come into contact with as a result of their work with AKF Australia. Harm includes (but is not limited to) physical, sexual or emotional exploitation, harassment or abuse
- Perpetrate harmful practices in any areas of their life. This may include (but is not limited to) employing child labour, participating in human trafficking in any capacity, practicing FGM (female genital mutilation), perpetrating forced or early marriage, intimate partner violence, elder abuse

Our staff will

- Abide by the AKF Australia Code of Conduct
- 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

Managers or Supervisors must

- Invest in Senior leadership at all levels with responsibility and expertise in safeguarding
- Set a personal example and model appropriate standards of behaviour
- Be alert to the possibility that safeguarding issues may be happening in their teams and take prompt action as per the procedure, should this be taking place
- Take steps to educate and make staff aware of their obligations under this policy
- Deal with all complaints quickly, sensitively, seriously and in confidence
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard
- Put safety and wellbeing at the heart of decision making



- Listen and consider the voice of survivors in decision making.
- Ensure that all concerns and discussions about a person's welfare, the decisions made and the reasons for those decisions are recorded in writing.
- Refer formal complaints about breaches of this policy in a safe, appropriate and timely manner, in line with the AKF Australia's Model reporting Procedures.
- Ensure that the safeguarding measures that guide the implementation of safeguarding policy is fully integrated within their areas of responsibility (the responsible project or programme manager will be accountable for implementing the safeguarding arrangements and associated procedures within his/her/their project or programme).
- Supervisors will use the safeguarding policy and Code of Conduct to determine what behaviours are appropriate or inappropriate and will guide their staff accordingly. Supervisors will provide their staff with regular opportunities to share information on any problems they are experiencing or anything they are concerned about, including unacceptable conduct.

Our CEOs and Country Directors must

- Address any safeguarding concerns raised in their Country of Operations (also referred to a "Unit"). The ultimate accountability for safeguarding at the Aga Khan Foundation (AKF) lies with the AKF General Manager, the Aga Khan Development Network (AKDN) Human Resources (HR) Director and members of the Global Aga Khan Foundation (AKF) Human Resources Committee, a sub-committee to the Global Aga Khan Foundation Board.
- Ensure that all members of the Unit adhere to the principles of the Global Safeguarding Manual (SM) and its associated Safeguarding standards at local level. They will be accountable to the local Board of Directors and the AKF Global Safeguarding Lead and AKF Senior Leadership from Head office in Geneva and will provide regular management reports on progress and performance in this area.
- Assign one of more project/programme Safeguarding Focal Point to liaise with communities and beneficiaries on safeguarding issues. The Global Safeguarding Lead's responsibility will be to hold the CEO accountable for reporting on safeguarding.

Our Safeguarding Focal Point (SFP*) and Safeguarding Managers must:

- Organize orientation/training on the Safeguarding policy
- Undertake self-audits and risk assessment
- Undertake partner due diligence
- Monitor and report on the implementation of the safeguarding policies, as well as other safeguarding related tasks.
- Support staff, representatives and partners in adhering to safeguarding policy • Refer staff to specialist agencies or professionals as required
- Hold the CEO accountable for reporting on safeguarding
- *In each unit an appropriate member of staff will be the Safeguarding Focal Point (SFP) if a full time Safeguarding Manager is not available.



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.

6. Related documents

- AKFA Australia Code of conduct
- AKFA Safeguarding Children and Young People Policy_2025
- AKFA Safeguarding Adults at Risk Policy_2025
- AKFA PSEAH policy
- AKFA Anti-Discrimination Bullying and Harassment Policy

7. 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

8. 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 th September 2025	1	New Policy	



Annexe 1: Safeguarding Statement of Commitment

This Statement of Commitment to Aga Khan Foundation Australia’s Safeguarding Policy and Code of Conduct must be signed by all AKF Australia staff and representatives, as defined in the AKF Australia policy and the AKF Global Safeguarding Manual, and retained on record before commencing duties.

I _____, have received, read and understood the contents of the AKF Australia Safeguarding Policy and Code of Conduct.

I understand what is expected of me in terms of my conduct whilst I am employed by AKF Australia. I understand that this policy applies 24 hours a day.

I understand when and how to report any safeguarding issues that I become aware of. I am aware of the terms of use for Safecall attached to this Statement.

I understand that any failure to uphold the AKF Australia Safeguarding Policy and Code of Conduct may result in the termination of my engagement with AKF Australia or other disciplinary action and possible referral of matters to relevant external bodies including statutory authorities, for example where a possible criminal breach is involved.

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



Annexe 2: SafeCall Terms of Use

By using the Safecall Speak-Up hotline and/or web platform, you hereby explicitly consent to the processing of your personal data by Aga Khan Foundation (1-3 Avenue de la Paix, 1202 Geneva, Switzerland) (hereinafter referred to as “AKF”) and SAFECALL LIMITED (100 Wood Street, London, EC2V 7EX, United Kingdom) (hereinafter referred to as “SAFECALL”) that you provide them with in order to benefit from the telephonic and online services offered by SAFECALL.

Subject to any applicable legal requirements, your personal data will be stored only as long as it is necessary for the purposes for which it was provided. You acknowledge that your personal data will be processed in accordance with the requirements of the Swiss Federal Act on Data Protection and the European General Data Protection Regulation 2016/679 (including any future amendments of such laws), which may differ from the data protection requirements in your country. Even though your personal data will mainly be processed by AKF in Switzerland and SAFECALL in the United Kingdom, you further acknowledge that (i) AKF need to transfer your personal data to any of its affiliated companies to allow reported cases to be handled.

Such AKF affiliated companies might be located inside and outside the European Economic Area, including in countries that are considered by the EU Commission and/or the Swiss Federal Data Protection and Information Commissioner as not ensuring an adequate level of protection for personal data. For such particular cases, AKF and SAFECALL implemented appropriate safeguards, such as the EU Commission’s standard contractual clauses or any other appropriate safeguards as foreseen under the EU and Swiss data protection laws. You might obtain a copy of such appropriate safeguards by contacting AKF and/or SAFECALL at the contact details below.

To exercise any of your rights (i.e. right of access, right to rectification, right to erasure, right to restriction of the processing, right to object to the processing, right to data portability, withdrawal of any previously given consent), please contact AKF at privacy@akdn.org.

Please however note that SAFECALL will act as an independent data controller with respect to personal data that you provide to SAFECALL but withhold from AKF or personal data that are not disclosed to AKF to protect your identity. For such personal data, please contact directly SAFECALL at Safecall’s own Privacy Policy found at www.safecall.co.uk/pp to exercise any of the abovementioned rights.

Please also note that (i) withdrawal of your consent does not affect the lawfulness of the processing of your personal data based on consent before your withdrawal, (ii) the exercise of some of your rights (e.g. objection to the processing, withdrawal of any previously given consent, etc.) may in some cases prevent SAFECALL from providing you with its services and (iii) your rights can in certain circumstances be limited (e.g. when personal data is required by AKF and/or SAFECALL to comply with the law or assert or defend against legal claims, etc.).

AKF and SAFECALL are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that the latter have not been able to assist with your complaint or concern, you have the right to make a complaint to the competent data protection authority.



Annexure 3: 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 Ghassmi

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.



Annex 4: Speak Up Contact details

AKF Global Safeguarding Lead

Ms. Kasia Bartman

Katarzyna.bartman@akdn.org

Tel. +41 229097226

Mob. +41 787152695

Global Director of Operations

Mr. Tom Austin

Tom.austin@akdn.org

Tel. +41 229097339

Mob. +41 792011484

AKDN HR Director & AKF Human Resources Committee member

Ms. Shams Jaffer

Shams.jaffer@akdn.org

Tel. +33 344584012

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/>