



AGA KHAN FOUNDATION

# AKF Safeguarding Manual 2025



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AGA KHAN FOUNDATION

# AKF Safeguarding Manual 2025

**Code of conduct**



# Introduction

The Aga Khan Foundation's (AKF) Code of Conduct outlines the ethical standards and behaviours expected of everyone associated with AKF, irrespective of hierarchy, status or position. It is designed to foster a culture of respect, accountability, and best practices to ensure a safe and inclusive environment aligned to AKF's values. Everyone associated with AKF is expected to demonstrate the highest standards of honesty, integrity and professionalism.



# Scope and purpose

This Code of Conduct applies to all contracted staff, both international and local, employed by AKF. Adapted Codes of Conduct are applicable to volunteers, partners, contractors and suppliers.

The purpose of this Code of Conduct is to define the expected conduct of AKF staff while under contract with the organisation. It forms part of all employment contracts and applies both within and outside working hours. Misconduct beyond AKF in the private domain may also need to be addressed if it comes to light.

Breaches of the Code of Conduct may result in disciplinary action, up to and including dismissal, depending on the severity of the breach.

While recognising local laws and cultures across regions, AKF is an International Non-Governmental Organisation (INGO), and this Code aligns with international and UN standards. AKF staff must uphold local laws wherever they operate. However, where this Code of Conduct is more stringent than local law, the Code takes precedence.

## **AKF's work is based on the principles of international conventions and instruments:**

- Convention on the Elimination of Discrimination Against Women (CEDAW)
- Convention on the Rights of Persons with Disabilities
- ILO Convention 190 (2019) on Eliminating Violence and Harassment in the World of Work
- United Nations Convention on the Rights of the Child (UNCRC)
- Universal Declaration of Human Rights

## **AKF's safeguarding policy is also in line with international standards and recommendations regarding safeguarding:**

- CHS Alliance Core Humanitarian Standard
- OECD DAC Recommendations on PSEAH
- IASC Principles and Standards for PSEA

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

## Mission and values

AKF is committed to fostering respectful relationships among staff, associates, volunteers and the wider communities with whom it works. AKF takes all reasonable measures to prevent harm, including any form of exploitation, abuse, bullying, harassment and abuse of power that may arise from contact with its staff, programmes or operations.

All staff are expected to consistently demonstrate high standards of personal, ethical and professional conduct and to share a collective responsibility to prevent misconduct and to safeguard children and adults.





## Code of conduct standards



### Uphold the Integrity and Reputation of AKF

#### As an AKF employee I will:

- Act in a manner that reflects AKF's values and ethical standards.
- Treat all people fairly, with respect and dignity.
- Use my authority and position responsibly, ensuring it is exercised with fairness and without abuse or harassment.
- Observe local laws and cultural norms when working in an international context or travelling on behalf of AKF.
- Avoid actions that could bring AKF into disrepute or compromise my ability to perform my role.
- Not work under the influence of alcohol or use or possess illegal substances on AKF premises, in AKF accommodation, or when representing the organisation



## Maintain Professional and Respectful Relationships

### As an AKF employee, I will:

- Maintain professional boundaries and not engage in relationships with programme participants, recognising the inherent power imbalance in such interactions.<sup>1</sup>
- Not engage in sexual activity with children (under 18), recognising that mistaken belief in age is not a defence.
- Not exchange money, employment, goods, or services for sex<sup>2</sup>, including sexual favours or any other form of humiliating, degrading or exploitative behaviour. This includes any exchange of support that is due to programme participants.
- Not engage in any commercially exploitative activities with children or adults at risk, including child labour or trafficking.
- Not consume, purchase, sell, possess, create or distribute any form of indecent images, including those depicting child abuse.
- Not physically, emotionally or psychologically harm a child or adult at risk in any way whatsoever.



## Ensure the Safety, Health, and Welfare of all AKF Staff and Associated Personnel (volunteers, partners, suppliers and contractors)

### As an AKF employee, I will:

- Adhere to all legal and organisational health and safety requirements in force at my location of work.
- Follow and comply local security guidelines and proactively inform management of any necessary changes to such guidelines.
- Act responsibly to minimise any unnecessary risk to the safety, health and welfare of myself, colleagues, partner organisations and communities we work with.



## Use AKF Information, Assets, and Resources Responsibly

### As an AKF employee, I will:

- Use AKF's assets and resources responsibly and ensure accountability for all monies and property entrusted to me.
- Not use AKF IT equipment, systems, software, e-mail or social media platforms to engage in any unethical or illegal activities, under local or international law, or to promote conduct that would constitute a criminal offence. This includes sharing, creating, or distributing any material that intimidates, harasses, or discriminates against individuals or groups based on protected characteristics, or that promotes extremism.
- Not use AKF IT equipment to access, download, create, distribute or store, in any way whatsoever, inappropriate and abusive content, including but not limited to pornography or any material depicting child abuse

1. Any intimate relationships between AKF staff and beneficiaries of assistance must be declared as a potential Conflict of Interest. For further guidance, please refer to the AKF Safeguarding Policy for more information. | 2. This statement does not reflect a judgement by AKF on individuals engaged in commercial sex work. Rather it prohibits AKF staff from exploiting their position of power in any way.





## Avoid Conflicts of Interest

### As an AKF employee, I will:

- Disclose any financial, personal or familial (or close intimate relationship) interest that may impact AKF's work.
- Not be involved in hiring, promoting, any form of contracting, or awarding benefits to individuals with whom I have financial, personal, familial (or close intimate relationship) ties.
- Seek permission from your CEO in writing before accepting any official role or nomination for political office.
- Maintain transparency and not accept significant gifts or remuneration from governments, communities with whom we work, donors, suppliers or any other persons which have been offered as a result of my employment with AKF, or with the intention to influence my professional judgement. *For additional guidance please refer to your country financial policy.*



## Maintain Confidentiality

### As an AKF employee, I will:

- Handle all matters of official business with care and discretion.
- Not disclose confidential information about colleagues, work-related matters, or sensitive data unless legally required to do so.



## Complaints and Reports

- All AKF staff are expected to report any concerns, incidents, or behaviours that may breach this Code. If any staff member witnesses, experiences, or becomes aware of, or suspects misconduct, they are encouraged to report it promptly to ensure a safe, accountable work environment. Reporting procedures are annexed to this document. Those reporting concerns are protected from retaliation.
- AKF may be required to refer or report serious incidents to external agencies, such as law enforcement, regulatory bodies, donors, or professional organisations as appropriate.



**By signing below, and in accepting my appointment, I acknowledge my commitment to uphold the principles outlined in this Code of Conduct. I understand that my actions reflect AKF's values and contribute to a safe, ethical, and respectful workplace for all.**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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 AKF 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.

See more details here: [www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

#### 24/7 Hotline Number

Contact details: \_\_\_\_\_

### 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 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 interest of the child takes precedence.

#### In this location, the reporting pathways are as follows

Contact details: \_\_\_\_\_







AGA KHAN FOUNDATION

# AKF Safeguarding Manual 2025

**Safeguarding policy**



# AKF's Safeguarding commitment

AKF 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 defines safeguarding as the responsibility to ensure that all individuals who come into contact with AKF staff, operations and programmes, including those who work in or with AKF, are protected from harm. AKF is committed to ensuring the identification, mitigation and management of a wide range of risks to:

**Beneficiaries and wider communities** - AKF makes every effort to ensure the safety and protection of individuals and groups, including children and adults with whom it interacts, particularly those who may be especially vulnerable or at risk.

**Staff, volunteers and other associates** - AKF 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 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.



# Purpose and scope

The purpose of this policy is to protect people from any harm 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 safeguarding cases.

AKF's 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) and the Convention on the Rights of Persons with Disabilities. AKF's safeguarding policy is in line with international standards and recommendations such as the CHS Alliance Core Humanitarian Standard and OECD DAC Recommendations on PSEAH. 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 staff, representatives or partners.

## AKF has also put in place policies for specific forms of harm or to safeguard specific groups. These are:



### AKF PSEAH policy (protection from sexual exploitation, abuse and harassment)

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



### AKF Safeguarding of children and young people policy

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



### AKF Safeguarding adults at risk policy

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



### AKF Anti-Discrimination, bullying and harassment policy

This policy protects staff and others working in AKF from specific forms of harm, or workplace violence, that might take place, or be experienced, within the workplace.



### AKF Financial and related misconduct policy

This policy protects AKDN against corrupt financial practices by personnel, affiliates, contractors, grantees or any stakeholder (such as bribery, fraud, money laundering, aid diversion, funding of terrorist activities, etc).

AKF will respond to safeguarding reports from any time period – there is no statute of limitations for safeguarding cases. AKF will accept anonymous safeguarding reports.

This policy should be adapted to include the relevant legislation of the country of operation where relevant and appropriate. Where this policy is more stringent than local legislation, this policy will apply.



#### THE POLICY APPLIES TO:

- Staff - permanent or temporary
- External service providers/Contractors
- Interns
- Researchers
- Consultants
- Volunteers
- Members of the organization's governing bodies/Representatives of AKF
- Visitors including journalists, photographers, donors, staff from other AKF units or AKDN agencies, or other organizations
- Implementing or other Partners (unless they have their own safeguarding policy of a similar standard)

AKF requires all staff, volunteers and representatives 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 ([Annex 1](#)).

Partner commitments will be reflected in specific clauses in their written agreements with AKF (see [Annex 6](#) for examples of these). A separate Code of Conduct for Visitors ([see sample at Annex 5](#)) will apply to all visitors.



# AKF's Safeguarding standards

**STANDARD 1**

AKF will ensure a workplace culture built on respect, that delivers a safe and inclusive environment for all staff.

**STANDARD 2**

AKF's safeguarding policy commitments are integrated into existing organizational processes and systems and, where necessary, new procedures will be introduced.

**STANDARD 3**

AKF 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 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's commitments to safeguarding and know what to do if concerns arise. AKF responds appropriately to safeguarding concerns.

**STANDARD 7**

Partners have safeguarding measures in place, which are consistent with AKF's standards.

**STANDARD 8**

AKF will ensure robust protection for anyone who raises a concern or makes a complaint regarding a breach of safeguarding policy.

# Policy statement

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



## AKF 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 cause harm nor 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 organization 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. 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 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



## Our 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 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 must

- Address any safeguarding concerns raised in their unit. The ultimate accountability for safeguarding at AKF lies with the AKF General Manager, the AKDN HR Director and members of the Global AKF Human Resources Committee, a sub-committee to the Board.
- Ensure that all members of the unit adhere to the principles of the Global Safeguarding Manual (SM) and its associated standards at local level. S/he/They will be accountable to the National Committee/AKF Global Safeguarding Lead and Geneva Leadership 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. A safeguarding contact will be designated on the AKF National Committee (where applicable, otherwise it will be the Global Safeguarding Lead) or on the Geneva Senior Management Team. His/her/their 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.



# Annexe 1: Safeguarding statement of commitment

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

I \_\_\_\_\_, have received, read and understood the contents of the AKF Global Safeguarding Policy and Code of Conduct.

I understand what is expected of me in terms of my conduct whilst I am employed by AKF. 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 Safeguarding Policy and Code of Conduct may result in the termination of my engagement with AKF 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

\_\_\_\_\_  
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 may need to transfer your personal data to any of its affiliated companies to allow reported cases to be handled.

Such AKF’s 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](mailto: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](http://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.

# Annexe 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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 AKF 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.

See more details here: [www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

**24/7 Hotline Number**

Contact details: \_\_\_\_\_

### 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 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 interest of the child takes precedence.

**In this location, the reporting pathways are as follows**

Contact details: \_\_\_\_\_









AGA KHAN FOUNDATION



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# AKF Safeguarding Manual 2025

**Safeguarding standards**



# AKF's Safeguarding standards

## STANDARD 1

**AKF will ensure a workplace culture built on respect, that delivers a safe and inclusive environment for all staff.**

- 1.1** Staff are trained in respectful workplaces. Leaders are provided with additional training on their responsibilities.
- 1.2** Leadership in AKF models the organisation's values.
- 1.3** Staff are regularly surveyed on their views of AKF as a workplace, and any necessary improvements are implemented.

## STANDARD 2

**AKF's safeguarding policy commitments are integrated into existing organizational processes and systems and, where necessary, new procedures will be introduced.**

- 2.1** AKF's policies and procedures are regularly assessed to ensure they incorporate safeguarding measures.
- 2.2** Appropriate policies and procedures are in place to prevent, enable reports, and respond to safeguarding concerns. These policies and procedures meet international safeguarding best practice.
- 2.3** Where gaps are identified, AKF will develop relevant policies and procedures to address those gaps.

## STANDARD 3

**AKF has measures and mechanisms in place for monitoring and reviewing safeguarding measures and for both upward and downward accountability in relation to safeguarding.**

- 3.1** AKF units undertake regular self-assessment to measure the extent to which they are meeting safeguarding standards, and develop action plans to address gaps.
- 3.2** The CEO reports on the results of annual self- assessments and action plans to the AKF National Committee (or equivalent) and the Geneva Global Safeguarding Lead

**STANDARD 4**

**Everyone connected with the organisation has the knowledge, attitude and skills to keep children and adults safe.**

- 4.1** AKF practices safe recruitment to ensure that staff and associated personnel are appropriately vetted to work with at risk communities.
- 4.2** Staff receive regular training on their safeguarding responsibilities, tailored to their role.
- 4.3** AKF has a zero-tolerance approach to inaction on safeguarding issues. Disciplinary procedures are in place to deal with staff who breach safeguarding policy and/or Code of Conduct, and are consistently applied.

**STANDARD 5**

**AKF 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.**

- 5.1** Staff are made aware of AKF's commitment to safety and wellbeing in the workplace through induction and training.
- 5.2** Multiple channels are available to report any concerns, including anonymous and external reporting mechanisms.
- 5.3** AKF treats all reports in a sensitive, fair, timely and confidential manner. Learning from how cases are managed is fed back into the organisation to make necessary improvements.

**STANDARD 6**

**Children and families understand AKF's commitments to safeguarding and know what to do if concerns arise. AKF responds appropriately to safeguarding concerns.**

- 6.1** CBRMs (Community Based Reporting Mechanisms) are in place that are safe, appropriate and accessible, based on consultation with community groups
- 6.2** Communities are aware of what to expect from AKF staff and programmes, and know how to report any concerns
- 6.3** Safeguarding concerns are followed up by AKF in a safe, timely, survivor-focused manner

**STANDARD 7**

**Partners have safeguarding measures in place, which are consistent with AKF's standards.**

- 7.1** Due diligence conversations are held with partners to ensure that theirs and AKF's safeguarding standards and approaches align
- 7.2** Agreements with partners include clauses on safeguarding
- 7.3** If required, partners are supported by AKF to reinforce their safeguarding arrangements and respond to safeguarding concerns

**STANDARD 8**

**AKF will ensure robust protection for anyone who raises a concern or makes a complaint regarding a breach of safeguarding policy.**

- 8.1** AKF will ensure that there are no negative consequences for staff reporting safeguarding concerns in good faith. This includes settlements that require confidentiality regarding the incident, or force the survivor to resign.
- 8.2** AKF will take measures to protect staff from retaliation from individuals against whom they have made a complaint.
- 8.3** AKF will fully support staff to speak up, and provide access to any support and protection that they may require.





AGA KHAN FOUNDATION



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# AKF Safeguarding Manual 2025

**Safeguarding children  
and young people**





# AKF's Safeguarding commitment



AKF 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 defines safeguarding as the responsibility of organisations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation to ensure that all individuals 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 and sexual exploitation, abuse and harassment.<sup>1</sup>

Children face risks due to their physical, societal and developmental status. These risks can be compounded by other intersecting identity characteristics, such as living with disability, SOGIE (sexual orientation and gender identity expression) or being a member of a marginalised community, or by circumstance such as living away from home, for example in institutions.

Even when they reach adulthood, young people face particular challenges in society globally. They are at a stage of personal transition, which can be impacted by issues such as access to secondary and tertiary schooling, unemployment and conflict. Young people also have skills and capacities which should be recognised and celebrated.



**This policy lays out the commitments made by AKF in relation to safeguarding children and young people.**

1. 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.

# Purpose and scope

The purpose of this policy is to protect children and young people from any harm 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 safeguarding cases. This policy should be used in conjunction with AKF's overarching Safeguarding Policy.

## Specific additional policies are in place to apply to:



### **AKF PSEAH policy (protection from sexual exploitation, abuse and harassment)**

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



### **AKF Safeguarding adults at risk policy**

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

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

AKF's 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) and the Convention on the Rights of Persons with Disabilities. AKF's safeguarding policy is in line with international standards and recommendations such as the CHS Alliance Core Humanitarian Standard and OECD DAC Recommendations on PSEAH.

AKF will respond to safeguarding reports from any time period – there is no statute of limitations for safeguarding cases. AKF will accept anonymous safeguarding reports.

This policy should be adapted to include the relevant legislation of the country of operation.

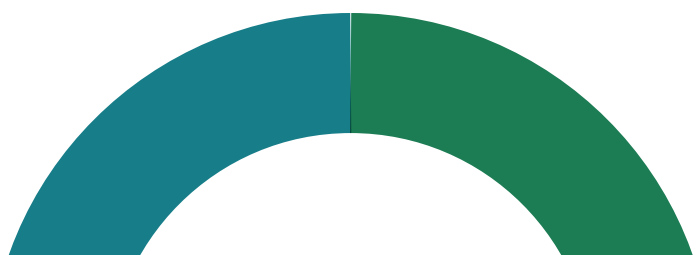


#### THE POLICY APPLIES TO:

- Staff - permanent or temporary
- External service providers/Contractors
- Interns
- Researchers
- Consultants
- Volunteers
- Members of the organization's governing bodies/Representatives of AKF
- Visitors including journalists, photographers, donors, staff from other AKF units or AKDN agencies, or other organizations
- Implementing or other Partners (unless they have their own safeguarding policy of a similar standard)

AKF requires all staff, volunteers and representatives to commit in writing to upholding the principles and standards in this Safeguarding Children and Young People Policy and the associated Code of Conduct (see Section 3 below), through a Statement of Commitment (see Annex 1).

Partner commitments will be reflected in specific clauses in their written agreements with AKF (see Annex 6 for examples of these). A separate Code of Conduct for Visitors (see sample at Annex 5) will apply to all visitors.



# AKF's Safeguarding standards

**STANDARD 1**

AKF will ensure a workplace culture built on respect, that delivers a safe and inclusive environment for all staff.

**STANDARD 2**

AKF's safeguarding policy commitments are integrated into existing organizational processes and systems and, where necessary, new procedures will be introduced.

**STANDARD 3**

AKF 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 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's commitments to safeguarding and know what to do if concerns arise. AKF responds appropriately to safeguarding concerns.

**STANDARD 7**

Partners have safeguarding measures in place, which are consistent with AKF's standards.

**STANDARD 8**

AKF will ensure robust protection for anyone who raises a concern or makes a complaint regarding a breach of safeguarding policy.

# Policy statement



**AKF will ensure that the following measures are in place specifically to safeguard children and young people:**

- Enhanced screening practices will be put in place for recruitment to positions with direct or indirect contact with children and young people. AKF will not knowingly employ any individual with a criminal conviction related to children or young people or other such offences related to their prospective position.
- Staff who will, or do, have contact with children or young people will have opportunities to understand how to interact with children or young people, identify concerns, receive disclosures appropriately and report within the timeframe required to ensure the child or young person is not put at further risk of harm.
- All staff and associates in contact with children will follow the guidelines on unacceptable conduct below
- Programmes and projects will be assessed for the risk harm for beneficiaries (including children or young people). Reasonable risk mitigation measures will be incorporated into the design and delivery of the programme.
- Programmes or projects involving children or young people who might be deemed particularly 'at risk' (e.g. they have particular disabilities, or are in circumstances, that might increase their risk of harm and abuse) will ensure that they, their parents (or their carers) understand what the participation in the programme or project involves, consent to it and have the necessary care or support arrangements in place to be able to participate safely.
- Each programme or project will conduct community awareness raising sessions with communities on AKF commitments to safeguarding and protecting them from harm. This will be done using language and content appropriate messaging and include explicit reference to acceptable and unacceptable behaviours by AKF staff and associates.
- Agreements with partners, suppliers etc. will include how they and AKF will work together to safeguard children or young people in the programmes or services being delivered.

## Guidelines on unacceptable conduct with children for AKF staff, volunteers and representatives

### Staff, partners and other representatives must never:

1. Hit or otherwise physically assault or physically abuse children.
2. Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years regardless of the age of majority/ consent or custom locally. Mistaken belief in the age of a child is not a defence.
3. Develop relationships with children which could in any way be deemed exploitative or abusive
4. Act in ways that may be abusive in any way or may place a child at risk of abuse.
5. Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
6. Behave physically in a manner which is inappropriate or sexually provocative
7. Have a child/children with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply and previous permission has been obtained from their line manager
8. Sleep in the same bed as a child with whom they are working
9. Sleep in the same room as a child with whom they are working unless exceptional circumstances apply and previous permission has been obtained from their line manager
10. Do things for children of a personal nature that they can do themselves
11. Condone, or participate in, behaviour of children which is illegal, unsafe or abusive
12. Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
13. Discriminate against, show unfair differential treatment or favour to particular children to the exclusion of others.
14. Spend excessive time alone with children away from others in a manner which could be interpreted as inappropriate
15. Expose a child to inappropriate images, films and websites including pornography and extreme violence
16. Possess, send, make or distribute indecent images of children
17. Interact with children with whom they are working through digital media such as SMS or social media. Any offensive material or unsolicited messages should be reported to the staff members' line manager
18. Place themselves in a position where they are made vulnerable to allegations of misconduct



This is not an exhaustive or exclusive list. Staff, partners and other representatives should at all times avoid actions or behaviour which may allow behaviour to be misrepresented, constitute poor practice or potentially abusive behaviour.<sup>2</sup>

2. Adapted from Save the Children Child protection Policy 2015

# 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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 AKF 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.

See more details here:

[www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

#### 24/7 Hotline Number

Contact details: \_\_\_\_\_

### 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 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 interest of the child takes precedence.

#### In this location, the reporting pathways are as follows

Contact details: \_\_\_\_\_









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# AKF Safeguarding Manual 2025

## **PSEAH Policy**

Protection from Sexual Exploitation,  
Abuse and Harassment



# AKF's Safeguarding commitment



AKF 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 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>

AKF'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 defines 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.



<sup>1</sup> 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.

# Purpose and scope

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.

## Specific additional policies are in place to apply for the:



### **AKF Safeguarding of children and young people policy**

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



### **AKF Safeguarding adults at risk policy**

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



### **AKF Anti-Discrimination, bullying and harassment policy**

This policy protects staff and others working in AKF from specific forms of harm, or workplace violence, that might take place, or be experienced, within the workplace.

## AKF defines sexual exploitation, abuse and harassment as follows:



### 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.



### 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.



### 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.

## 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 providing employment
- Sexual harassment in the workplace
- Sexual assault
- Trafficking individuals for the purpose of sexual exploitation

AKF 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.

This policy should be adapted to include the relevant legislation of the country of operation, where relevant and appropriate. Where this policy is more stringent than local legislation, this policy will apply.



#### THE POLICY APPLIES TO:

- Staff - permanent or temporary
- External service providers/Contractors
- Interns
- Researchers
- Consultants
- Volunteers
- Members of the organization's governing bodies/Representatives of AKF
- Visitors including journalists, photographers, donors, staff from other AKF units or AKDN agencies, or other organizations
- Implementing or other Partners (unless they have their own safeguarding policy of a similar standard)

AKF requires all staff, volunteers and representatives to commit in writing to upholding the principles and standards in Safeguarding Adults at Risk Policy and the associated Code of Conduct (see Section 3 below), through a Statement of Commitment (see Annex 1).

Partner commitments will be reflected in specific clauses in their written agreements with AKF (see Annex 6 for examples of these). A separate Code of Conduct for Visitors (see sample at Annex 5) will apply to all visitors.

# AKF's Safeguarding standards

**STANDARD 1**

AKF will ensure a workplace culture built on respect, that delivers a safe and inclusive environment for all staff.

**STANDARD 2**

AKF's safeguarding policy commitments are integrated into existing organizational processes and systems and, where necessary, new procedures will be introduced.

**STANDARD 3**

AKF 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 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's commitments to safeguarding and know what to do if concerns arise. AKF responds appropriately to safeguarding concerns.

**STANDARD 7**

Partners have safeguarding measures in place, which are consistent with AKF's standards.

**STANDARD 8**

AKF will ensure robust protection for anyone who raises a concern or makes a complaint regarding a breach of safeguarding policy.



# Policy statement

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



## AKF 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 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.<sup>2</sup>
- 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 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.

<sup>2</sup> 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.



## Our staff will

- Abide by the AKF Code of Conduct
- Remain alert to safeguarding risks and ensure familiarity with safeguarding policies
- Attend safeguarding training
- 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
- Escalate matters of concern as required and be alert to AKF 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.



# 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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 AKF 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.

See more details here: [www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

#### 24/7 Hotline Number

Contact details: \_\_\_\_\_

### 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 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 interest of the child takes precedence.

#### In this location, the reporting pathways are as follows

Contact details: \_\_\_\_\_







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# AKF Safeguarding Manual 2025

**Safeguarding adults  
at risk policy**



# AKF's Safeguarding commitment



AKF 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 defines safeguarding as the responsibility of organisations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation. This term covers physical, emotional and sexual harassment, exploitation and abuse by staff and associated personnel, as well as safeguarding risks caused by programme design and implementation.<sup>1</sup>

AKF defines an at-risk adult as any person aged 18 years and older who may be at risk of abuse or exploitation due to their dependence or reliance on others for services, basic needs or protection, and according to context, for example, in humanitarian situations. An adult may also be at risk or vulnerable when in a relationship (social or work) with another who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them. They may also be at risk if their decision-making capacity is impaired and/or they do not have the support to make a decision.

Being at risk is not a 'fixed' characteristic but rather changes due to a range of factors, and can change over time. For example, a person living with a disability may not be at risk in their own usual environment, but may become so if they are displaced and away from their usual coping mechanisms.

AKF's programmes can put our staff in a position of relative power over communities we seek to assist. This means that adults with whom we come into contact may be at risk of harm, exploitation or abuse. This can be amplified by other intersecting factors such as living with disability, age, SOGIE (sexual orientation or gender identity), and ethnic heritage. Therefore this policy may also apply to any adults who come into contact with AKF staff and programmes.



**This policy lays out the commitments made by AKF in relation to safeguarding adults at risk.**

1. CHS Alliance PSEAH Implementation Quick Reference Handbook 2020



# Purpose and scope

The purpose of this policy is to protect adults at risk, including staff, from any harm 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 safeguarding cases. This policy should be used in conjunction with AKF's overarching Safeguarding Policy.

## Specific additional policies are in place to apply to:



### **AKF PSEAH policy (protection from sexual exploitation, abuse and harassment)**

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



### **AKF Safeguarding of children and young people policy**

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



AKF will respond to safeguarding reports from any time period – there is no statute of limitations for safeguarding cases. AKF will accept anonymous safeguarding reports.

This policy should be adapted to include the relevant legislation of the country of operation where relevant and appropriate. Where this policy is more stringent than local legislation, this policy will apply.



#### THE POLICY APPLIES TO:

- Staff - permanent or temporary
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- Interns
- Researchers
- Consultants
- Volunteers
- Members of the organization's governing bodies/Representatives of AKF
- Visitors including journalists, photographers, donors, staff from other AKF units or AKDN agencies, or other organizations
- Implementing or other Partners (unless they have their own safeguarding policy of a similar standard)

AKF 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 (see Annex 6 for examples of these). A separate Code of Conduct for Visitors (see sample at Annex 5) will apply to all visitors.

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# Policy statement

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



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

- Enhanced screening practices will be put in place for recruitment to positions with direct or indirect contact with adults at risk. AKF will not knowingly employ any individual with a criminal conviction related to vulnerable groups or other such offences related to their prospective position.
- Employees who will, or do, have contact with adults at risk will have opportunities to understand how to interact with adults at risk, identify concerns, receive disclosures appropriately and report within the timeframe required to ensure the adult at risk is not put at further risk of harm.
- Programmes and projects will be assessed for the risk harm for beneficiaries (including adults at risk). Reasonable risk mitigation measures will be incorporated into the design and delivery of the programme.
- Programmes or projects involving adults who might be deemed 'at risk' (e.g. they have particular disabilities, or are in circumstances, that might increase their risk of harm and abuse) will ensure that the adults (or their carers) understand what participation in the programme or project involves, consent to it and have the necessary care or support arrangements in place to be able to participate safely.
- Each programme or project will conduct community awareness raising sessions with communities on AKF commitments to safeguarding and protecting them from harm. This will be done using language and content appropriate messaging and include explicit reference to acceptable and unacceptable behaviours by AKF staff and associates.
- Agreements with partners, suppliers etc. will include how they and AKF will work together to safeguard adults at risk in the programmes or services being delivered.

# 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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)

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#### In this location, the reporting pathways are as follows

Contact details: \_\_\_\_\_







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# AKF Safeguarding Manual 2025

**Anti-discrimination, bullying  
and harassment policy**



# AKF's Safeguarding commitment



AKF 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 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>



<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.

# Purpose and scope

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's overarching Safeguarding Policy

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



## **AKF PSEAH policy (protection from sexual exploitation, abuse and harassment)**

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

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



### **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 favorably 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 favorable 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



### **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.



### **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

1

enduring the offensive conduct becomes a condition of continued employment

2

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.

This policy should be adapted to include the relevant legislation of the country of operation, where relevant and appropriate. Where this policy is more stringent than local legislation, this policy will apply.



### THE POLICY APPLIES TO:

- Staff - permanent or temporary
- External service providers/Contractors
- Interns
- Researchers
- Consultants
- Volunteers
- Members of the organization's governing bodies/Representatives of AKF
- Visitors including journalists, photographers, donors, staff from other AKF units or AKDN agencies, or other organizations
- Implementing or other Partners (unless they have their own safeguarding policy of a similar standard)

# AKF's Safeguarding standards

**STANDARD 1**

AKF will ensure a workplace culture built on respect, that delivers a safe and inclusive environment for all staff.

**STANDARD 2**

AKF's safeguarding policy commitments are integrated into existing organizational processes and systems and, where necessary, new procedures will be introduced.

**STANDARD 3**

AKF 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 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's commitments to safeguarding and know what to do if concerns arise. AKF responds appropriately to safeguarding concerns.

**STANDARD 7**

Partners have safeguarding measures in place, which are consistent with AKF's standards.

**STANDARD 8**

AKF will ensure robust protection for anyone who raises a concern or makes a complaint regarding a breach of safeguarding policy.

# Policy statement

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



## **AKF 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

# 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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 AKF 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.

See more details here: [www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

#### 24/7 Hotline Number

Contact details: \_\_\_\_\_

### 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 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 interest of the child takes precedence.

#### In this location, the reporting pathways are as follows

Contact details: \_\_\_\_\_







AGA KHAN FOUNDATION



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# AKF Safeguarding Manual 2025

**Financial and related  
misconduct**



# Financial and related misconduct



As stated in the AKDN Code of Business Ethics, the governance of its agencies, affiliates and programmes is based transparency, honesty, trust, probity, equity and accountability.

It is therefore AKF policy to ensure that activities are conducted by AKDN personnel and all other associated individuals in accordance with the highest ethical standards of honesty, integrity and professionalism.

We require total compliance and we have a zero-tolerance of corrupt activities of any kind, whether committed by AKF employees or by third parties acting for or on behalf of AKF.

Financial misconduct which includes fraud; bribery, money laundering, funding terrorist activity or aid diversion of any kind and observation of corrupt practices by colleagues or others is prohibited and will be dealt with by the highest extent of the law. Bribery is a criminal offence in many countries Money laundering is the term used for a number of offences involving the proceeds of crime or terrorist funds. It includes possessing, or in any way dealing with, or concealing, the proceeds of any crime. CEOs must ensure that no staff engages in corrupt behaviour of any kind.



# Safeguarding beneficiaries and communities

AKF embraces its responsibility to uphold national and international safeguarding obligations for both adults and children. We recognize that all children and adults are equal, irrespective of their age, sex, gender identity, ability, language, ethnicity, sexual orientation, marital status, nationality, class, faith or culture. We recognize the right of every person, without discrimination, to survival, well-being and development, as well as to protection from harm, including protection from sexual abuse, exploitation and harassment (PSEAH). Wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies. Additional expectations for a specific context should be added to this Code of Conduct.

## To safeguard the organisation

- AKF will clearly document fraud, anti-corruption procedures and instructions and clearly communicate these to all employees, sub-contractors, grantees, and other stakeholders; no staff may engage in any fraud.
- AKF will conduct a fraud risk assessment and produce a fraud control strategy that clearly outlines fraud prevention, detection, investigation and reporting processes and procedures, including externally to relevant authorities and donors, for example, in line with their fraud reporting requirements.
- AKF will recover any funds or property acquired or distributed through the fraud, including taking recovery action in accordance with recovery procedures (including civil litigation) available in country.
- AKF will manage programme finances and assets thoroughly including the use and maintenance of asset registers.
- AKF will ensure sub-contractors; grantees or representatives are compliant with AKF's requirements and manage the risk of fraud and corruption.
- AKF will ensure staff who are primarily engaged in detecting or investigating fraud or corruption are appropriately skilled and experienced.
- AKF will provide comprehensive fraud awareness training tailored to its staff's needs. This will include an ongoing program of regular fraud awareness and prevention sessions designed for all employees, subcontractors, grantees, agents, and representatives, ensuring consistent education and vigilance across all stakeholders.
- AKF will provide fraud training in employee induction programmes which will be recorded in a training register.
- AKF will evaluate training programmes to determine whether participants are in fact more aware of fraud control and their responsibilities.
- AKF will require implementing partners and suppliers to present a code of conduct, fraud control policy and anticorruption/bribery policy to ensure their compliance with AKF standards.



### Measures to address bribery and corruption include but are not limited to:

- It is prohibited to, directly or indirectly, offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain contractual or regulatory advantage for AKF, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
- It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. AKF should not make a payment to a third party on behalf of a foreign public official.
- If anyone is offered a bribe, or a bribe is solicited, this is refused unless immediate safety is in jeopardy and the matter is reported immediately to relevant manager/s i.e. Line Manager, or any member of the Senior Management Team.
- Facilitation payments or “grease payments” to Public Officials made to secure or expedite the performance of routine or expected action to which the payer is entitled are not permitted. These are equivalent to bribes.
- Appropriate checks are made before engaging with suppliers or other third parties of any kind to reduce the risk of AKF business partners breaching our anti-bribery rules.
- AKF must ensure that all of its transactions, including any sponsorship or charitable donations, are made transparently and legitimately.
- AKF will uphold laws relating to bribery and will instigate disciplinary procedures and take appropriate disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in staff dismissal if they are an employee, or the cessation of AKF’s arrangement with others if self-employed, an agency worker, contractor etc.

# Money laundering risk assessment

**There are a number of specific areas where AKF is potentially vulnerable to falling prey to money laundering:**

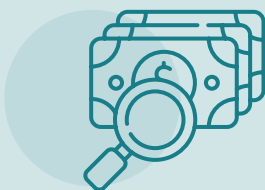
- Units may receive requests for unusual transactions, such as a request to pass funds through an office account, or to hold cash on behalf of a third party, or to pass this in some way back to AKF
- Programmes and partners may be subject to suspicious or unusual transactions resulting from money laundering
- Interest-free loans
- Donors requesting unusual or over-specific restrictions on a gift, or requesting its return in whole or part
- Requests to use AKF as a conduit to pass money through
- Using staff as couriers to carry cash or small items of value to persons or organisations overseas;
- Suppliers may be set up to provide such money laundering facilities, so AKF must ensure that due tender and procurement process is followed, and due diligence conducted to ensure that suppliers are confirmed as bona fide.

**For the purpose of clarity, definitions of these corrupt practices are clearly listed below:**



## Bribery

- Offer a bribe
- Accept a bribe
- Fail to prevent a bribe



## Money Laundering

**Money laundering has three stages:**

- Placement, through which the funds (often in cash) enter the financial systems
- Layering, by which the funds pass through a complex sequence of transactions designed to make it impossible for investigators to follow a trail of evidence back to the origin of the funds
- Integration, the point at which the funds emerge from the process back into the legitimate economy in a way that they are unrecognisable as the proceeds of crime





### Fraud

- Theft
- Obtaining property, a financial advantage or any other benefit by deception
- Causing a loss, or avoiding or creating a liability by deception
- Providing false or misleading information, or failing to provide information where there is an obligation to do so
- Making, using or possessing forged or falsified documents
- Bribery, corruption or abuse of position
- Unlawful use of AKF computers, vehicles, telephones and other property or services
- Divulging confidential information to outside sources
- Hacking into, or interfering with AKF's computer systems
- Facilitation of payments or similar

Anyone found guilty by a court of committing bribery could face a substantial prison sentence and/or an unlimited fine. The organisation could also face prosecution and be liable to pay a fine. Employees are reminded of the Speak Up policy and procedure for reporting concerns regarding bribery and corruption.

If any staff member or person working on behalf of AKF, suspects that an act of bribery, or attempted bribery, has taken place, even if they are not personally involved, they are expected to report this to their line manager, who in turn is expected to report it to any member of the Senior Management Team.

AKF must take any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any such instances arise.

Foundations can be especially susceptible to the attentions of potential money launderers. An international presence often in regions where there are serious issues in control and regulation, make them particularly attractive for use as a stage in the layering process.

## 1

## Anti-Terrorism Considerations

AKF receives and allocates funds to partners for their exclusive use on development activities.

Terrorism, in common with other criminal acts, infringes the fundamental rights of the innocent and the powerless and diverts money and attention from the real needs of the communities we are committed to helping.

AKF does not give money or support to terrorist organisations or give money to partners who carry out, or fund, or advocate terrorist activity. AKF is fully committed to ensuring all its business processes minimise the risk of funds being diverted for terrorist or any other criminal purposes. AKF works within the law to ensure that its operations and that of its partners is free from interference and that resources are used for the purposes intended.

## 2

## Obligations of all employees, trustees, volunteers, consultants, seconded and interns

Current criminal law places three obligations on all persons:

- not to assist in the money laundering process through acquiring, concealing, disguising, retaining or using the proceeds of crime
- not to prejudice an investigation
- not to contact any person who has been suspected of and reported for possible money laundering in such a way as to make them aware of the suspicion or report (“tipping off”). It is important to bear in mind that the law requires all cases of suspicion to be reported, regardless of size.

## 3

## Money laundering reporting procedures

In some countries, UK for example, it is a legal requirement to appoint a Money Laundering Reporting Officer (‘MLRO’) to be responsible in law for receiving suspicion reports in an organisation and for passing these on to relevant authorities.


Unless otherwise determined by local law/ regulations, any concerns of this kind should be raised via AKF’s reporting procedure described in the ‘Speak Up’ policy and in line with concerns or suspicions around any of the safeguarding matters described above, suspicions of fraud or money-laundering should be reported immediately and will be handled in line with the process described in this document.

## Other types of financial misconduct

AKF prohibits any practices which have as their object or effect the prevention, restriction or distortion of competition.

All individuals who are AKF and/or AKDN entity nominees and/or representatives who may be involved in AKF or in AKDN affiliated companies which are in the public domain or are quoted on a stock exchange, will be expected to follow the rules and regulations set forth by the regulators, authorities and stock exchanges in their respective countries of operation.

Individuals will adhere to all listing, disclosure and/ or any other reporting requirements and shall discharge their duties with honesty and follow best practices at all times.



All business transactions and payments must be properly documented. All contracts must be written. In addition to the above, the following practices are prohibited:

- Bid rigging
- Collusion or coercion by bidders
- Fraudulent bids
- Fraud in contract performance
- Product substitution
- Defective pricing or parts
- Cost/labour mischarging
- Bribery and acceptance of gratuities
- Travel/travel expenses fraud
- Theft and embezzlement
- Professional expenses fraud

1

### Gifts and Hospitality

The organization expressly prohibits the giving and receiving of hospitality/ gifts and similar where the intention is to receive or confer an advantage in return for giving or receiving the hospitality/business gift or similar.

Individuals associated with AKF are prohibited from offering gifts, entertainment or hospitality that they know or believe will constitute a bribe or which they know or believe will breach any gifts and entertainment policy applicable to the recipient.

Particular vigilance is necessary when dealing with public officials because anything beyond common courtesies and reasonable promotional expenses can appear as a bribe.

No gift above the value of \$50 should be given nor hospitality offered by an employee or anyone working on behalf of AKF to any party without receiving prior written approval from the CEO or Head of Finance. Similarly, no gift or offer of hospitality above the value of \$50 should be accepted by an employee or anyone working on our behalf without receiving prior written approval from the Head of Finance or CEO.

All expenses for gifts or hospitality provided must be put through the relevant expenses systems. As such, a record of all such expenditure will be maintained.

## 2

### Donations

Any charitable donation must be consistent with AKF's charitable objects as defined in its founding charter and in line with the requirements set out by any local regulators.

The organisation expressly prohibits the giving of donations to political parties.

This policy is subject to review and the organisation reserves the right to amend this policy without prior notice to ensure compliance with current legislation.

## 3

### Conflict of Interest

AKF shall not request an individual to undertake work that could result in a conflict of interest.

All individuals associated with AKF, irrespective of their status or position, shall exercise the utmost objectivity and avoid conflict of interest situations between their direct or indirect personal interests (including of members of their immediate family) and the interests of AKF.

Individuals must notify their direct supervisor in writing of any actual or potential conflict of interest situation. Failure to do so will result in the instigation of disciplinary procedures. If in doubt, the individuals concerned should consult their direct supervisor without delay.

An individual shall also be deemed to have a conflict of interest or an apparent conflict of interest, in a situation, which may affect their judgment or loyalty towards AKF or the wider Network.

# Prohibited activities



## Probity Obligation

All individuals who are part of AKF, may not take up positions and/or be part of, or have affiliations with, any organization (commercial or non-commercial) which may be involved in or have links with institutions which may bring disrepute to AKF or to any of its affiliated organisations.



## Insider information

No individual associated with AKF, irrespective of their status or position, may buy or sell shares or other securities of a business undertaking, or give advice on the same, if they have access, by reason of their professional activities, to any non-public information about that business undertaking.





AGA KHAN FOUNDATION

# Annexe 1: Safeguarding statement of commitment

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

I \_\_\_\_\_, have received, read and understood the contents of the AKF Global Safeguarding Policy and Code of Conduct.

I understand what is expected of me in terms of my conduct whilst I am employed by AKF. 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 Safeguarding Policy and Code of Conduct may result in the termination of my engagement with AKF 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

\_\_\_\_\_  
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 may need to transfer your personal data to any of its affiliated companies to allow reported cases to be handled.

Such AKF’s 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](mailto: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](http://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.



# Annexe 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 listed below.

### 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 4](#)) 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 your country is

Contact details: \_\_\_\_\_

#### 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 Senior Manager, 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 AKF 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.

See more details here: [www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

#### 24/7 Hotline Number

Contact details: \_\_\_\_\_

### 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 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 interest of the child takes precedence.

#### In this location, the reporting pathways are as follows

Contact details: \_\_\_\_\_



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



### What will happen?

1. AKF will take all complaints that are raised seriously and will handle them in a consistent, timely and fair manner
2. AKF will take appropriate steps to ensure there is no retaliation against an employee who raises a complaint/speaks up.
3. AKF 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.**

You will find the contact details for your location here: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# Annexe 4: Speak-Up Contact details

## AKF Global Safeguarding Lead

### **Ms. Kasia Bartman**

katarzyna.bartman@akdn.org

Tel. +41 22 909 7226

Mob. + 41 78 7152 695

## AKF Global Director of Operations

### **Mr. Tom Austin**

tom.austin@akdn.org

Tel. +41 22 909 7339

Mob. + 41 79 2011 484

## AKDN HR Director & AKF Human Resources Committee member

### **Ms. Shams Jaffer**

shams.jaffer@akdn.org

Tel. +351 213 949 900

## SAFECALL

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

Tel. +44 (0) 800 915 1571

Local numbers (where available): <https://www.safecall.co.uk/file-a-report/telephone-numbers/>

# Annexe 5: Code of Conduct for Visitors

## Introduction

Aga Khan Foundation is a private, international, non- denominational, non-profit development agency established in 1967. It seeks to bring together the required technical, human and financial resources to assist the poorest and most marginalized, especially women and girls, within strategic geographic areas, such that they achieve a level of self-reliance and improved quality of life. The Foundation has branches and affiliates in 21 countries, with its headquarters in Geneva.

Children and adults at risk have a right to protection and as a branch of an international organization, Aga Khan Foundation has an obligation to make sure that we safeguard all those that we work with. It is the responsibility of all AKF staff, representatives, and visitors (including journalists, photographers, donors, staff from other AKF units or AKDN agencies or other organizations) to ensure that we serve the needs and protect the well-being of children and adults at risk to whom we have a special duty of care, including those with whom we work, are in contact with or who are affected by our activities.

For this reason, we have policies and systems in place to prevent abuse, neglect and exploitation and to safeguard all those we work with (as detailed in our Safeguarding Policy). These measures also protect visitors from actions that could be misconstrued and lead to false or malicious accusations.

Visits to projects, partners and communities are opportunities to see our work first-hand. We would like you to enjoy your visit and at the same time help us to keep children and adults safe by introducing you to the key elements of our policy that affect you as a visitor.

If you have any questions, you should refer to your main point of contact within AKF or to the Safeguarding Focal Point. You can also request to see a full copy of our Safeguarding Policy.

## Definition of a Child and Vulnerable Adult

A **child** is a person under the age of 18 years, according to the United Nations Convention on the Rights of the Child (Article 1).

A **vulnerable adult or adult at risk** is a person, 18 or above, who, by reason of disability, age or illness, the context they are in or as a result of social or other inequalities, is or may be unable to take care of or protect him or herself against significant harm or exploitation.

## Guidance on Responsible Behaviour

This information is designed to protect children and vulnerable adults first and foremost, but also to minimize the risk to visitors of being wrongly accused of inappropriate behaviour or abuse. By agreeing to be a visitor, you are agreeing to abide by this guidance on the understanding that if you do not adhere to it, your visit will be ended.

### As a visitor, you will:

- Always arrange your visit through the AKF office.
- Follow the directions and instructions of the staff member of AKF who is assigned to supervise your work or accompany you on the visit.
- Treat children/ adults, their families and their communities with equality and respect their privacy (for example, not entering their homes without an invitation).
- Take photographs or recordings only after consultation with AKF staff and in line with the good practice outlined below
- Discuss any concerns you have regarding the well- being of a child/ adult with an AKF staff member or the Safeguarding Focal Point.
- Ask the AKF staff member when you are not sure of what is acceptable behaviour.

### As a visitor, you will never:

- Use language make suggestions or offer advice that is inappropriate, offensive or abusive.
- Behave physically in a manner that is inappropriate or sexually provocative. For example, fondle, hold, hug, kiss or touch children/vulnerable adults in an inappropriate or culturally insensitive way.
- Do things for children/ adults of a personal nature that they can do for themselves.
- Condone or participate in behaviour with children/ adults that is illegal, unsafe or abusive.

- Act in ways intended to shame, humiliate, belittle or degrade people or engage in any form of emotional abuse or physically hit a child.
- Discriminate against, show preferential treatment to or favour particular children/ adults to the exclusion of others.
- Develop physical and/or sexual relations with children/ adults or their family members.
- Develop relationships with children/ adults that could in any way be deemed exploitative or abusive.
- Spend time alone with children/ adults at risk away from others.
- Assist a child/ adult at risk to leave their community, even with the consent of parents/ guardians, or offer them a chance to visit your country of residence.
- Exchange personal contact details with children/ adults at risk.
- Arrange to stay overnight with a child/ adult or their family.
- Introduce other visitors to the community without prior clearance from AKF.
- Return to the community without prior clearance from AKF.

## Guidance on Taking Photos or Recordings

- Obtain informed consent of the child/ adult and their parents/guardians before taking photographs and images, under guidance from an AKF staff member. This means explaining what you will do with the image or recording and would normally require a signature for agreement from an adult. Children cannot themselves give consent.
- Take and use photographs and images that are dignified and respectful and that do not present them as victims, vulnerable or submissive.
- Ensure children/ adults are adequately dressed in photograph and recordings and not in poses that could be interpreted as being sexually suggestive.
- Protect the safety and privacy of children/ adults by not using their images on the internet or social media without explicit consent from AKF, or using them in any way that reveals the identify or location of the child/ adult and their family.
- Do not use photographs and recordings of children/ adults to benefit financially or for journalistic purposes without express permission from AKF.

# Annex 6: Partnership Clauses (examples)

## Example 1

The AKF Global Safeguarding Policy forms an integral part of this agreement. The partner/volunteer group has read and understood this policy before signing this agreement and agrees to fully comply with it.

The Partner/volunteer group shall ensure:

- I. that its staff attend training/briefing on the AKF Global Safeguarding Policy provided by AKF and;
- II. that concerns about possible breaches of the Global Safeguarding Policy are brought immediately to the attention of AKF. The parties will agree how such concerns will be investigated safely, confidentially and in a timely manner. Any investigation in relation to violations of the AKF Global Safeguarding Policy must take into consideration the best interests and safety of those involved.

## Example 2

The Company/Organisation acknowledges that it has received a copy of and has read AKF's Safeguarding Policy and such supporting and briefing materials as AKF deems necessary describing AKF's safeguarding commitments.

It is an absolute requirement of AKF and a condition of this agreement that no person or body who/ which carries out work on AKF's behalf pursuant to this agreement is or has been or becomes in any way involved in or associated with the abuse or exploitation of vulnerable groups as described in the Safeguarding Policy.

The Company/Organisation as a condition of this agreement agrees that it will bring the contents of the Safeguarding Policy to the attention of any employees, agents, sub-contractors or other workers who are engaged to carry out part or all of the work contracted to be done for AKF and to instruct them to observe and apply the Safeguarding Policy strictly in all of their dealings with and on behalf of AKF.

If it became known that the Company/Organisation or any of its employees, agents, sub-contractors or other workers were or are or become involved in breaches of the Safeguarding Policy or otherwise conducted themselves in such a way that compromised the safety of beneficiaries, staff or other individuals and assets and thereby also compromised the integrity and reputation of AKF, this would constitute a breach of the terms of this agreement and result in AKF being entitled summarily to terminate the agreement. Such breaches must be notified to AKF immediately.