



## Safeguarding Policy

Version 2.4 approved by President 01 October 2025  
Responsible Officer: Director, Risk Management

Revisions:

Version	Date	Approved by	Summary of Changes
2.0	11 Sept 23	CRD	Details of anonymous reporting facility emphasised.
2.1	16 May 24	CRD	Sexual Harassment examples extended. Bullying and Workplace Harassment expanded. Referral of complaints to Director, Risk Management added in line with existing requirement stated in Whistleblower.
2.2	11 Dec 24	CRD	Minor revision to definition of Sexual Harassment. Sections re-ordered. At 5.2.5 inclusion of specific reference to sexual harassment at work.
2.3	9 June 25	CRD	Direct reporting details for DFAT added
2.4	21 July 25	CRD	Clarifications and streamlining of sections. Alignment with the language of CAPSEAH

Reviews:

July 2022	Charles Duff
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## 1. PURPOSE

The purpose of this policy is to protect people, including Children, community members and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Alinea. This includes harm arising from:

- the conduct of Representatives and Volunteers associated with Alinea, and,
- the design and implementation of Alinea’s programs and activities.

The policy lays out the commitments made by Alinea and informs Representatives and Volunteers of their responsibilities in relation to safeguarding.

## 2. SAFEGUARDING GOVERNANCE

This Policy is applicable to all Company activities. It is part of the Company’s governance structure and applies to all Representatives and Volunteers as well as to any Project visitors including journalists, politicians and celebrities. Any deviation from this Policy requires the approval of the Responsible Officer.

President and CEO	Responsible for policy, oversight and review of safeguarding
Management Committee	Oversees regular review of safeguarding
President	Drives culture of safeguarding
Responsible Officer	Maintains and ensures implementation of policy and supporting framework
Project Directors and Managers	Ensure staff comply with the policy and foster a culture where risks can be identified, escalated and managed
Staff and Contractors	Comply with safeguarding policies and procedures

The Company has in place Guidelines, Business Processes, SOPs and Tools to support implementation of this Policy.

The Responsible Officer, with input from the business as appropriate, is responsible for maintaining and implementing the related Guidelines, Business Processes, SOPs and Tools.

Guidelines, Business Processes, SOPs and Tools may vary with different operating environments if required by local legislation, Client rules and regulations and other factors, subject to the approval of the Board of Directors.



### 3. DEFINITIONS

“Bullying” usually involves repeated incidents or a pattern of behaviour that is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media.

“Business Partner” means any Representative, subcontractor, grantee, sub-grantee, awardee, sub-awardee, adviser, vendor, supplier, landlord or other organization providing goods or services to the Company.

“Child/Children” refers to a person(s) below the age of 18 years.

“Company” refers to Alinea International Ltd. (Alinea) and all of its subsidiaries or related companies.

“Compliance” means adherence to laws, codes, regulations, rules, standards, policies and guidelines concerning proper conduct, management, and business transactions.

“Discrimination” means the unjust or prejudicial treatment of different categories of people, especially on the grounds of a protected class.

“Employee” means any person who has a part-time, full-time, intermittent, continuous or fixed-term employment relationship with the Company or Business Partner.

“Exploited” means forcing a person into slavery, servitude or forced labour, Sexual Exploitation, removal of organs, securing services by threat, or securing services from Children or vulnerable adults – see s3 of The Modern Slavery Act 2013.

“Guidelines” means the written elaborations on Company policy that provide further information and interpretation for the implementation of policy.

“Harm” refers to Psychological, physical and any other infringement of an individual’s rights.

“Harassment” means bullying, threats, intimidation, ridicule or exclusion on the basis of a protected characteristic.

“Health, Safety, Security, Environment (HSSE)” refers to the obligation of the Company and Business Partners to provide a safe working environment and system of work.

“Human Trafficking” means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of Sexual Exploitation, Forced Labour or services, slavery, or practices similar to slavery, servitude or the removal of organs.

“Management Committee” refers to the President, Vice Presidents, Chief Financial Officer, Director, Business Development and Office Managers.

“Manager” refers to any Employee who is responsible for the direction of other Employees.

“Modern Slavery” is an overarching term encompassing all forms of contemporary slavery including Human Trafficking, slavery, servitude, Descent-based Slavery, Forced Labour, Debt Bondage or Bonded Labour, Forced and early Marriage and Child Labour. It is the recruitment, movement, harbouring or receiving of Children, women and man through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. 1926 Slavery Convention defines slavery as ‘the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised’.

“Policy” means the policy of the Company from time to time set out in a policy document approved by the Board of Directors.

“Project” means a piece of work subject to a contract between the Company and any client on which Representatives or Volunteers are engaged.

“Project Director” refers to the Employee with day-to-day responsibility for the management of a Project.

“Protected Act” A person does a protected act if they: make a claim or complaint under the (UK) Equality Act 2010 (the Act) (for example, for discrimination or harassment); help someone else to make a claim by giving evidence or information; make an allegation that someone has breached the Act; or they do anything else in connection with the Act

“Protected Characteristics” refers to personal attributes which are legally protected, usually by anti-discrimination laws and includes: race, nationality, ethnic origin, gender reassignment, gender identification, marital status, sex, sexual orientation, culture, religion or belief, pregnancy, maternity, disability and age. Protected Characteristics may vary by jurisdiction.

“Representative” means an Employee or any person who has an independent individual contractual relationship with the Company, whether as a contractor, consultant or agent of the Company. This includes non-executive directors of the board.

“Responsible Officer” means the Representative who is accountable for execution of the Company policy.

“Safeguarding Focal Point” refers to the person within an office or a Project who has responsibility for communicating about safeguarding issues with her/his team and supporting the Team Leader/Chief of Party to embed safeguarding across the team concerns.

“Sexual Exploitation” means 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. For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities, or other benefits.

“Sexual Abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual assault, rape, molestation, and other forms of non-consensual sexual activity. All sexual activity with a child (a person under 18 years old) is considered to be sexual abuse.

“Sexual Harassment” means a range 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’, sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating. This includes jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; display of or circulation of pornographic material. Sexual harassment can take place in the work environment or in communities and public spaces.

“Protection from SEAH (PSEAH)” means to prevent and actively manage and mitigate the risk of SEAH and respond appropriately when it occurs. This means taking all reasonable actions to: protect people, populations and personnel; proactively reduce SEAH risk and prevent SEAH incidents; create or strengthen ways in which concerns can be raised; and to respond robustly to concerns and cases in a way which prioritises the rights, dignity and needs of victim-survivors.

“Survivor” means a person who has been abused or exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive, however it is the individual’s choice how they wish to identify themselves.

“Standard Operating Procedures” or “SOPs” are the detailed written descriptions of Business Processes that aim to ensure consistency and quality in process execution.

“Tool” means templates, forms, charts, informational and any other material prescribed for use in conjunction with an element of a Policy, Guideline, Business Process and SOPs.

“Transactional Sex” means the exchange of sexual activity for money, goods or other benefit.

“Victimization” means subjecting a person to a detrimental effect because they have, or it is believed that they will, commit a Protected Act, for example made a complaint.

“Volunteer” means anybody providing voluntary support to the Company who is not a Representative.

## 4. SAFEGUARDING POLICY

Safeguarding, social responsibility and respect for human rights are central to Alinea’s expectations of its Projects, Business Partners, Representatives and Volunteers. We operate a zero-tolerance attitude towards any form of abuse and require everyone in the scope of this policy to work to eliminate breaches. We do not tolerate failure to act, to prevent or respond.

Safeguarding means protecting people’s health, well-being and human rights, and enabling them to live free from harm, abuse and neglect. In our sector, we understand it to mean protecting people, including Children, from harm that arises from coming into contact with our Representatives, Business partners, Volunteers, visitors or Projects. This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, including in relation to sexual misconduct.

Safeguarding applies consistently and without exception across our Projects. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse. We have mature, accountable and transparent systems for response, reporting and learning when risks materialize. These systems are survivor-centered and follow due process. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Alinea believes that everyone we come into contact with, regardless of race, nationality, ethnic origin, gender reassignment, gender identification, marital status, sex, sexual orientation, culture, religion or belief, pregnancy, maternity, disability, age and any other legally protected characteristic has the right to be protected from all forms of harm, abuse, neglect and exploitation.

Alinea prohibits abuse or exploitation by Representatives, Business Partners, Volunteers or visitors to our Projects.

Representatives and Volunteers are required to proactively contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.

This policy addresses the following areas of safeguarding:

- Human Rights;
- Child Safeguarding;
- Protection from Sexual Exploitation, Abuse and Harassment;
- Protection against Modern Slavery and Human Trafficking; and
- Inclusivity and Diversity



- Bullying and Harassment

These key areas of safeguarding have different policies and procedures associated with them (see Associated Policies in section 8 below).

Alinea commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

## 5. PREVENTION

### 5.1. Alinea Responsibilities

Alinea will:

- ensure that the business and its operations respect human rights;
- ensure all Representatives have access to, are familiar with, and know their responsibilities within this policy;
- design and undertake all its Projects and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Alinea, this includes the way in which information about individuals in our Projects is gathered and communicated;
- implement stringent safeguarding procedures when recruiting, managing and deploying Representatives and Volunteers;
- ensure Representatives receive training on safeguarding at a level commensurate with their role in the organization;
- follow up on reports of safeguarding concerns promptly and according to due process; and
- take appropriate and proportionate action against persons found in breach of this policy.

### 5.2. Representative Responsibilities

#### 5.2.1. Respect for Human Rights

Our support for the international human rights is enshrined in our business practises and our membership of the UN Global Compact evidences our commitment to upholding human rights. Our Representatives and Business Partners must conduct business in a manner that respects the human rights of all parties and are expected to refrain from business practices that compromise universal human rights principals, including labour and safety standards and codes.

Representatives must respect the laws and regulations of the countries we work in, while maintaining an overarching adherence to universal human rights laws.

Representatives must not condone or endorse any policies, laws, practices or behaviours that may compromise our ethical standards.

#### 5.2.2. Child Safeguarding

Alinea is committed to upholding the values and purpose of the UN Convention on the Rights of the Child, which require that Children will be protected from performing any work that is likely to be

hazardous, interfere with a Child’s education, or is harmful to a Child’s health or physical, mental, spiritual, moral or social health.

Representatives must understand and appreciate that the responsibility is on them to use common sense and good judgment to avoid actions and behaviours that could be construed as Child abuse.

Alinea Representatives and Volunteers must not:

- engage in sexual activity with anyone under the age of 18;
- Sexually Abuse, Exploit, or Harass Children;
- subject a Child to physical, emotional or psychological abuse, or neglect; or
- engage in any commercially exploitative activities with Children including Child labour or trafficking.

Alinea Representatives, Business Partners and Volunteers must be familiar with and abide by the Child Protection Code of Conduct. See Annex B.

### 5.2.3. Protection from Sexual Exploitation Sexual Abuse and Sexual Harassment (SEAH)

Alinea endorses the Common Approach to Protection Against Sexual Exploitation, Abuse and Harassment (CAPSEAH) and intends that its approach aligns with the common principles of work and the actions to protect against SEAH detailed in that guide.

<https://capseah.safeguardingsupporthub.org/>

Alinea uses definitions explained in CAPSEAH to understand what is meant by SEAH:

“**Sexual Exploitation**” means 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. For example, coercing individuals into engaging in sexual activities in exchange for aid, services, employment opportunities, or other benefits.

“**Sexual Abuse**” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes sexual assault, rape, molestation, and other forms of non-consensual sexual activity. All sexual activity with a child (a person under 18 years old) is considered to be sexual abuse.

“**Sexual Harassment**” means a range 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’, sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating. This includes jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; display of or circulation of pornographic material. Sexual harassment can take place in the work environment or in communities and public spaces.

Examples of behaviour that amounts to Sexual Harassment **include but are not limited to:**



- Sexual comments or jokes.
- Staring or leering.
- Sexual gestures.
- Unwanted, uninvited or inappropriate touching, patting, hugging, massaging, kissing or other physical contact.
- Using gendered 'pet' names, e.g. 'honey', 'doll', 'babe' etc.
- Using gendered terms of abuse.
- Insults or taunts of a sexual nature.
- Intrusive questions or statements about someone's personal life.
- Sending sexually explicit or suggestive emails or messages.
- Sending sexual photographs through messages or emails.
- Displaying posters, magazines or screen savers of a sexual nature.
- Inappropriate advances on social networking sites.
- Requests for any form of sexual activity.
- Spreading sexual rumours about a person.
- 'Outing' a person as lesbian, gay, bisexual or transgender, whether or not that person is actually lesbian, gay, bisexual or transgender.
- Repeated requests or other forms of pressure for a sexual or other personal (rather than professional) relationship, e.g. repeated requests for a 'date'.
- Remarks speculating about a person's sexual activities or history, or remarks about one's own sexual activities or history.
- Innuendo or other suggestive, offensive or derogatory comments or jokes.
- Open or implied threats that submission to sexual advances will be a condition of some form of commendation, work status or access to promotion or development opportunity or positive performance evaluation.
- Treating a person less favourably because they have been (or are thought to have been) subjected to sexual harassment or sexual abuse, that they will be
- Behaviour that may also be an offence under criminal law such as physical assault, indecent exposure, stalking, obscene communications.
- It should be borne in mind that a pattern of conduct can be subtle in nature, have subtle overtones and still be intended to create or have the effect of creating distress and/or humiliation or a hostile environment.

Alinea prohibits Sexual Exploitation, Abuse, or Harassment (SEAH) of any kind within our organization or from those we work with. We recognize that the work we do brings risks of SEAH, particularly, in that development and humanitarian initiatives can exacerbate inequitable power dynamics inherent within these working contexts including when engaging with, particularly women, girls, boys, sexual and gender minorities or persons with disabilities, as well as populations who are displaced or otherwise lacking access to basic rights and protections.

Representatives and volunteers are required to engage proactively; identifying, preventing and guarding against all risks of SEAH. They must be particularly aware of the increased risk to Children. Alinea Representatives, Business Partner Representatives, Volunteers and visitors must not engage in sexual



activity with anyone under the age of 18. Mistaken belief or ignorance of the age of a child is no defence.

Every complaint raised will be taken seriously and investigated in a timely manner, by appropriate people and in line with the victim-survivor centred approach. The safety, rights and dignity of the victim-survivor are a paramount consideration.

Alinea Representatives, Business Partners, Volunteers and visitors must not:

- exchange money, employment, goods or services for sexual activity including any exchange of assistance that is due to beneficiaries of assistance; or
- engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics; or
- behave in a way that violates another person's dignity, makes them feel intimidated, degraded or humiliated, or creates a hostile or offensive environment.

Alinea Representatives, Business Partners and Volunteers must be familiar with and abide by the protection against SEAH Code of Conduct. See Annex A.

The Company acknowledges that it has a positive legal duty to prevent Sexual Harassment of its Representatives during the course of their engagement and will take all reasonable steps to prevent it (the 'preventative duty'<sup>1</sup>).

#### 5.2.4. Bullying and Harassment

Whether in the workplace or in the community, Alinea has a zero-tolerance attitude to Bullying and Harassment. We expect our Representatives and Volunteers to treat everybody with respect and dignity.

Harassment and Bullying usually involve repeated incidents or a pattern of behaviour that is offensive, intimidating, threatening, malicious or insulting. It may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media. It may be the conduct of one person acting alone or it may be two (or more) different people.

Bullying behaviour becomes harassment when it is linked to any form of unlawful discrimination.

Examples of behaviour that may be construed as Bullying and/or Harassment **include but are not limited to:**

- Spreading malicious rumours, gossip, or innuendo.

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<sup>1</sup> See Part 5 of the Equality Act 2010 (UK) and the Worker Protection (Amendment of Equality Act 2010) Act.

- Making rude, degrading, or offensive remarks.
- Exclusion from work-related social or professional invitations.
- Displaying sexist, racist or other offensive pictures, posters or social media.
- Excluding or isolating someone socially.
- Undermining or deliberately impeding a person's work.
- Physically abusing or threatening abuse.
- Abuse of a situation of formal or informal authority or power to threaten a person's job or undermine their performance.
- Removing areas of responsibility without cause.
- Establishing impossible deadlines that will set the individual up to fail.
- Withholding necessary information or purposefully giving the wrong information.
- Making jokes that are 'obviously offensive' by spoken word or e-mail, or through social media.
- Intruding on a person's privacy by pestering, spying or stalking.
- Assigning unreasonable duties or workload which are unfavourable to one person (in a way that creates unnecessary pressure).
- Yelling or using profanity.
- Criticizing a person persistently or constantly.
- Belittling a person's opinions.
- Unwarranted (or undeserved) punishment.
- Blocking applications for training, leave or promotion.
- Tampering with a person's personal belongings or work equipment.
- 'Mobbing', whereby two or more colleagues gang up on an individual.

Alinea Representatives, Business Partners, Volunteers and visitors are prohibited from any form of bullying, harassment or physical, emotional or psychological abuse or neglect.

#### **5.2.5. Protection from Modern Slavery and Human Trafficking**

Alinea has zero-tolerance approach to Modern Slavery and Human Trafficking. Pursuant to the Modern Slavery Act 2015, the Company makes and publishes its commitment to preventing these illegal activities in its operation and supply chain through its annual Modern Slavery Statement. We will continue to update our Employment Policy to demonstrate compliance with key legislation on international principles on labour and ethical employment.

Representatives, Business Partners and Volunteers are expected to understand that vulnerability to Modern Slavery and Human Trafficking can be affected by factors related to the presence or absence of protection and respect for human rights, physical safety and security, access to the necessities of life (including food, water and health care) and patterns of migration, displacement and conflict.

Alinea Representatives, Business Partners, Volunteers and visitors must not:

- hold another person in slavery or servitude.
- require another person to perform forced, bonded or compulsory labour; or
- arrange or facilitate the travel of another person with a view to that person being exploited.

If Modern Slavery or Human Trafficking are suspected, Representatives and Volunteers must report their concerns immediately as outlined below but must not try to intervene on their own as it might make the situation of that individual worse.

#### 5.2.6. Inclusivity and Diversity

Alinea values diversity and employs and partners with individuals and organizations from a wide range of cultures and races. The Company is committed to an open and Discrimination free workplace. Representatives and Volunteers must not engage in discriminatory behaviours on the basis of race, nationality, ethnic origin, gender reassignment, gender identification, marital status, sex, sexual orientation, culture, religion or belief, pregnancy, maternity, disability, age or any other legally protected category.

The Company is dedicated to promoting gender equity and inclusive workplaces where persons with disabilities and other disadvantaged or vulnerable groups are reasonably accommodated.

Alinea Representatives, Business Partners, Volunteers and visitors must not engage in any form of unlawful discrimination.

## 6. REPORTING

Alinea will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to Representatives and the communities we work with.

Representatives and Volunteers must report any actual or suspected breaches of this policy immediately. Unless the person is the victim-survivor, failure to report a Safeguarding concern could be viewed as negligence and might result in disciplinary action or even dismissal. While victim-survivors are strongly encouraged to report as soon as they can, it is better to report at some point than not at all.

Any Representative or Volunteer raising any Safeguarding concerns or complaints will be protected by Alinea's Whistleblowing Policy.

Alinea will also accept reports from external sources such as members of the public, partners and official bodies.

### 6.1. How to Report a Safeguarding Concern

Representatives and Volunteers who have a concern relating to safeguarding should report it immediately to their line manager. If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate senior staff member. For example, this could be any member of Management, the Safeguarding Officer or the Director, Risk Management.

It is possible to make an **anonymous** report through the Company website but wherever possible, Alinea encourages Representatives and Volunteers to include their names to facilitate a more efficient investigation of the concerns raised.

Safeguarding Officer, Shelley Priebe: [shelleyp@alineainternational.com](mailto:shelleyp@alineainternational.com)  
Director, Risk Management, Charles Duff: [charlesd@alineainternational.com](mailto:charlesd@alineainternational.com)

Alinea's Whistleblower Hotline: [ethics@alineainternational.com](mailto:ethics@alineainternational.com)

Company website: [www.alineainternational.com](http://www.alineainternational.com)

Where there are suspicions or allegations of improper conduct of any kind in relation to a project funded by the Australian Government or the UK Government, any person can make direct reports to:

Australian Department for Trade and Foreign Affairs (DFAT)

**SEAH:** [seah.reports@dfat.gov.au](mailto:seah.reports@dfat.gov.au) or +61 2 6178 5100.

**Child Protection:** [childwelfare@dfat.gov.au](mailto:childwelfare@dfat.gov.au) or +61 2 6178 5100.

UK Foreign Commonwealth and Development Office (FCDO)

at [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk) or +44 (0) 1355 843747

## 7. RESPONSE

Alinea takes all safeguarding concerns seriously and prioritises the safety, rights and dignity of the victim-survivor.

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need-to-know basis only and will be kept secure at all times.

All safeguarding concerns are referred, in confidence, to the Director, Risk Management. If the concern involves the Director, Risk Management it will be referred to another senior manager in the Company. Alinea will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations. Information regarding the safeguarding concern will be held securely on a 'need to know' basis in the Safeguarding Register.

Alinea will investigate all safeguarding concerns, to the extent possible, with respect for the alleged victim-survivor's safety.

The results of an investigation are 'substantiated' or 'not substantiated', on the basis of a 'balance of probabilities'. The investigation is administrative, not criminal or otherwise quasi-judicial. A finding that the allegation is 'not substantiated' does not mean that the misconduct did not take place, or that the alleged perpetrator is not responsible. It means only that the threshold of 'a balance of probabilities' was not crossed.

If a safeguarding allegation is found to be substantiated, Alinea will take appropriate action. Sexual Exploitation and Sexual Abuse constitute gross misconduct. Sexual harassment constitutes misconduct,

possibly including gross misconduct. Appropriate action may, therefore, include disciplinary action up to and including termination or cessation of contract. In some cases, Alinea will seek legal redress. Whether or not an allegation is found to be substantiated, other action may include further training for the alleged perpetrator and/or team; continued monitoring or restriction of the alleged perpetrator's duties.

Alinea will offer support to survivors of harm caused by Representatives or Volunteers, regardless of whether an investigation is carried out or the result of that investigation. Decisions regarding support will be led by the survivor.

**Non-Retaliation /Victimization:** If a concern has been raised in good faith, Alinea operates a policy of non-retaliation. Alinea will not discipline, demote, fire or terminate the contract of anyone raising a concern about safeguarding issues in good faith, regardless of whether the allegation is found to be substantiated. If the Company is made aware that there has been retaliation by any other Representative or sub-contractor, appropriate disciplinary steps will be taken up to and including dismissal or termination of contract, where appropriate.

Malicious or vexatious reports will not be tolerated and will result in disciplinary action up to and including dismissal where appropriate.

## 8. ASSOCIATED POLICIES AND GUIDELINES

The Safeguarding Policy is to be read in conjunction with other related policies and guidelines including:

- Child Protection Policy
- Child Protection Guidelines
- Code of Conduct
- Due Diligence Policy
- Due Diligence Guidelines
- Employment Policy
- Health, Safety, Security and Environment Policy
- Modern Slavery Guidelines
- Project Management Policy
- PSEAH Guidelines
- Risk Management Policy
- Risk Management Guidelines
- Recruitment Policy
- Whistleblower Policy

## 9. DUTY TO COMPLY

It is the responsibility of each Representative of the Company to fully comply with this Policy. Failure to comply may result in legal and/or disciplinary action including contract termination, contract non-renewal or other appropriate action.

## ANNEX A PROTECTION AGAINST SEAH CODE OF CONDUCT

Alinea prohibits all forms of sexual exploitation, abuse and harassment and has a policy of zero tolerance towards inaction. This means that the Company will take all allegations or safeguarding concerns seriously and will ensure that investigations are conducted by appropriate people. Alinea will adhere to the principles of the Victim-Survivor centred approach which respects the rights of the victim-survivor to confidentiality, self-determination about whether and to what extent they participate in any investigation and support to the victim-survivor.

Representatives and Business Partners **will not, whether in person or online:**

- use language or behaviour towards others that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- In any way sexually exploit, abuse, or harass any other person;
- Procure sexual services for another, or use a third party to do so;
- Withhold services or goods provided by Alinea or another party in exchange for sexual or degrading actions, or any personal favours whether of a sexual nature or not;
- accept sexual activity as an exchange for any goods, services, contracts, contacts or other benefits;
- Refer to people (whether they be present or not) in a sexualised way and/or in a way that a reasonable person might determine is offensive and/or degrading;
- Use Alinea or Business Partner organisation facilities, personnel, or resources to distribute or view pornography or sexually degrading material;
- Engage in a sexual relationship with program beneficiaries; or
- Use Alinea or Business Partner organisation facilities, personnel, or resources for the purpose of arranging transactional sex for oneself or any other person.

While engaged on a contract with Alinea, Representatives and Business Partners must not:

- Engage in transactional sex, including in countries where it is legal; or
- Engage in any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour, including sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations

Representatives and Business Partners warrant that they **will:**

- treat all people with dignity and respect;
- maintain and encourage a culture that is supportive of survivors of SEAH and encourages SEAH incident reporting;

- demonstrate conduct that does not tolerate SEAH and promote the principles and practices of the safeguarding and Protection Against SEAH Guidelines, including to clients, colleagues, community members and beneficiaries where possible;
- be aware that sexual behaviour is an area of sensitivity, and conduct considered appropriate in some workplaces may more readily be interpreted as offensive, or be misinterpreted, in other contexts;
- be aware of power imbalances that affect their relationships with others and may hinder the ability of others to consent to and/or report sexualised behaviour or activities;
- ensure personal conduct towards others is not exploitative or cannot reasonably lead to a perception of exploitation;
- acknowledge that just because a person does not object to inappropriate behaviour at the time it happens, it does not mean that they are consenting to the behaviour;
- encourage and support workplace diversity;
- report any suspected incident of SEAH or suspected breach of the Safeguarding Policy, within the required timeframes;
- disclose any previous SEAH-related charges or offences; or,
- Inform Alinea of any SEAH related charges or offences incurred during the term of their engagement.

## ANNEX B: CHILD PROTECTION CODE OF CONDUCT

Alinea is committed to upholding the values and purpose of the UN Convention on the Rights of the Child (CRC). This means that Alinea considers everyone under the age of 18 years to be a child, regardless of the age of majority, marriage or age for sexual consent in the country. However, if the age of majority is set by national law above 18 years, the greater age will prevail.

The UN CRC holds that children have the right to be protected; not to be discriminated against; for actions to be taken that are in their best interests; and to survive and develop. This means that children with whom Alinea comes into contact will be protected from performing any work that is likely to be hazardous, interfere with a Child's education, or is harmful to a Child's health or physical, mental, spiritual, moral or social health and it ensures that Alinea will take all reasonable steps to protect children from harm such as violence, sexual abuse or neglect.

The Company has a zero-tolerance approach to all forms of Child exploitation and abuse – whether in person or online - and requires Representatives and Business Partners to commit to the protection of Children. Specifically, Representatives and Business Partners **will**:

- treat Children with respect regardless of race, colour, sex or gender, language, religion, political or other opinion, national, ethnic or social origin, property, birth, or other any other protected status;
- whenever possible, ensure that another adult is present when working in the proximity of Children;
- refrain from physical punishment or physical discipline of Children;
- refrain from hiring Children for domestic or other labour;
- comply with all applicable laws, rules, and regulations concerning Child protection, including laws in relation to Child labour;
- immediately report concerns or allegations of Child exploitation and abuse and policy non-compliance in accordance with appropriate procedures;
- immediately disclose all charges, convictions and other outcomes of an offence that relates to Child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with Alinea;
- be aware of behaviour and avoid actions/behaviours that could be perceived as Child exploitation and abuse.

Representatives and Business Partners **will not**:

- engage in any sexual activity with Children under the age of 18, whether in person or on line;
- use language or behaviour towards Children that is inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate;

- expose any child to any form of pornography or other, explicit sexual abuse material
- use any computers, mobile phones, video cameras, cameras or social media to exploit or harass Children, or access Child exploitation material through any medium;
- invite unaccompanied Children into the Representative's home or place of residence without explicit, parental consent;
- sleep close to unsupervised Children; and
- supply controlled or otherwise illicit drugs to Children for any purposes.

Alinea's Representatives and Business Partners are discouraged from taking photographs or films of children that contain any identifying features such as faces, homes or schools. When photographing or filming a Child for work-related purposes, Representatives and Business Partners will:

- assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a Child;
- explain how the photograph or film will be used and obtain written consent from the Child's parent or guardian before photographing or filming a Child and assent from the Child;
- ensure photographs and films, however recorded and stored, present Children in a dignified and respectful manner and not in a vulnerable or submissive manner;
- ensure that Children are adequately clothed and not in poses that could be seen as sexually suggestive;
- ensure images are honest representations of the context and the facts;
- ensure that physical and electronic labels of photographs and films do not reveal identifying information about a Child; and
- ensure that images of children are held in a secure location, cannot be reproduced without permission and are deleted as soon as possible.

