# Safeguarding Policy

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INTRODUCTION

1. POLICY STATEMENT

International Alert has a policy of zero tolerance to abuse and will make every
dependable to prevent and stop abuse happening.

International Alert has a duty of care to protect anyone, especially our beneficiaries, who
come into contact with our work, from any form of abuse.

It is essential that in all of our work - in the UK and globally – International Alert (hereafter
‘Alert’) upholds the highest standards of conduct in its staff (trustees, employees, interns,
voluteers), partners, and other associates (consultants, partner organisations, suppliers).
These standards are embodied in our Ethical Framework and related policy documents.

Alert does work in some countries with children or adults at risk. However, in all
our work, proactively safeguarding and promoting the welfare of all who come into contact with Alert¹ is
a key governance priority for Alert’s Trustees. Implementing and upholding the policy is a key
duty of all of our managers, and all staff, partners, and other associates have a
responsibility to comply with the policy and promptly report any breaches.

This Policy will be made compliant with local legislation by each of our overseas offices and
forms part of the Staff Handbook in each office.

2. WHAT IS SAFEGUARDING?

Safeguarding and promoting well-being and welfare means:
- protecting the rights of adults (aged 18 and over) to live in safety, free from abuse and
  neglect;
- protecting children and young people under 18 years of age from maltreatment;
- preventing impairment of health or development;

¹ Applies to all activities taking place on Alert premises and includes work-related functions held outside
  of normal working hours, either on or off the organisation’s premises, such as leaving celebrations,
  working lunches, etc. Expatriate Alert staff are considered to be on Alert business at all times except
  when they are on officially-sanctioned annual leave.
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- ensuring they are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable them to have the best outcomes.

Everybody has the right to be safe no matter who they are or what their circumstances. Abuse and neglect can have devastating effects on individuals, families and wider society, and the damage from safeguarding incidents and allegations can be devastating.

3. POLICY AIMS

The aims of this policy are to:

- Ensure Alert provides a safe and trusted environment which safeguards anyone who Alert has contact with;
- Ensure that safeguarding policies, procedures and measures are understood by all staff, partners, and other associates;
- Promote an organisational culture that prioritises safeguarding and makes it safe for those affected (directly or indirectly) to report incidents and concerns with the assurance that they will be handled sensitively and properly;
- Provide clarity on how incidents and allegations will be handled, should they arise;
- Reflect our obligations to our UK regulators, and to the donors that support our work, as well as the laws of the countries in which we work.

4. WHAT IS ABUSE?

Abuse is a misuse of power and control that one person has over another. Where someone is dependent on another, there is the possibility of abuse or neglect unless enough safeguards are put in place. Abuse takes many forms, can occur in any relationship and may result in significant harm or exploitation. Alert considers that abuse is any behaviour towards a person that causes harm, endangers life or violates rights. Within this broad definition of abuse, the following subtypes of abuse are identified:

(i) Physical abuse - includes assault, hitting, slapping, pushing, restraining someone or only letting them do certain things at certain times.

(ii) Domestic abuse - includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.

(iii) Sexual abuse - includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn’t consent to or was pressured into consenting.

(iv) Sexual exploitation – includes any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes including, but not limited to, profiting financially, socially or politically from the exploitation of someone else. Using prostitutes is strictly forbidden at any time when engaged on Alert business.

(v) Harmful cultural practices – includes child marriage.

(vi) Commercial exploitation - includes child labour, slavery (including domestic slavery), human trafficking and forced labour.
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(vii) Financial or material – includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.

(viii) Psychological abuse – includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

(ix) Neglect and negligent treatment.

(x) Discrimination – includes types of harassment or insults because of someone’s race, gender or gender identity, age, disability, sexual orientation or religion.

5. ALERT’S ETHICAL FRAMEWORK: VALUES AND PRINCIPLES

All Alert staff, partners, and other associates are required to adhere to the following values:

• **Progress** because no society is perfect, and each contains both the need and opportunities for improvement;
• **Fairness** because everyone should have access to opportunities, and should not be treated arbitrarily, nor discriminated against, because of status or identity;
• **Respect** because everyone should be valued and respected as a person with inalienable human rights and her or his own values and views;
• **Inclusion** because the participation and collaboration of people with diverse and complementary knowledge and perspectives is critical for cohesion and the quality of outcomes;
• **Openness** about intentions and actions, because this is an essential element of trust, accountability and collaboration.

All Alert staff, partners, and other associates are required to adhere to the following principles:

• We have a duty of care to those with whom we work and with whom our representatives work;
• We monitor the consequences of our actions, and discontinue or change any that are not contributing to peace;
• We avoid increasing people’s risk of harm by our actions, though we respect the choices they make themselves;
• We are aware of the possibility of abuse of the power which unequal relationships at times confer on us and take reasonable measures to prevent that possibility;
• We recognise that every human has equal rights to protection from abuse and exploitation and that the welfare of vulnerable persons should particularly be safeguarded and promoted;
• We have a responsibility to ensure contractors with whom we work meet minimum standards of safeguarding in their work and to support them wherever them to achieve this;
• We have a duty to report any actual or suspected incident of abuse using Alert’s reporting system;
• We will take all suspicions and allegations of abuse seriously and respond swiftly and appropriately.
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6. PUTTING SAFEGUARDING INTO PRACTICE

All activities undertaken by Alert shall be planned, organized and delivered in accordance with the principles of this Policy.

**Due Diligence:**
- To the fullest extent possible, due diligence will be conducted prior to contracting to ensure that there is no history of prior abuse of the principles of this Policy. This will apply to:
  - New staff (strengthened guidelines on reference taking)
  - Partners, and other associates (will also be vetted to ensure they provide adequate guidance for their staff to avoid any abuse of the principles of this Policy)
- Any Alert staff and contractors who will work directly with children and/or vulnerable adults will be subject to more rigorous vetting procedures. For more information regarding vetting procedures contact Alert’s Director of Finance & Operations, Senait Fassil on sfassil@international-alert.org

**Deterrence:**
A key aspect of prevention is to deter potential perpetrators from committing abuse:
- All staff are required to have read and signed the Ethical Framework and Staff Handbook, which (in forming part of the employment contract with Alert) provide a firm basis (if breached) for disciplinary action and other sanctions, as appropriate.
- **Partners and other associates** are required to have read and signed the Ethical Framework, and this policy also forms part of their contract with Alert. Failure to comply may result in immediate termination of the contract and other sanctions, as appropriate.
- **Compliance** with this policy is integrated within Alert's internal compliance monitoring mechanisms (including internal audit).

**Support**
Alert will deliver safeguarding briefings and support to help Alert staff, partners and other associates know:
- what is acceptable, and what is unacceptable, behaviour when working for Alert.
- how to safely and securely report their concerns when they experience or witness abuse or other misconduct.

**CHILD PROTECTION**

1. POLICY STATEMENT

While the UN Convention on the Rights of the Child was almost universally ratified fifteen years ago, there is still much to be done to ensure the protection of this especially vulnerable group.

Alert is committed to protecting children from abuse. We recognise that child abusers may try to infiltrate charitable organisations and cannot be easily identified. Abusers can be male or female members of any social, cultural or economic group and of any age.

Alert’s Safeguarding Policy and procedures place particular emphasis on preventing incidences of child abuse, and responding to accusations of abuse in a manner that respects all involved.
1. CHILDREN’S RIGHTS

All children have needs and rights. Alert believes the following is an essential, but not exhaustive, list of the rights of a child:

- The need for physical care and attention;
- The need for intellectual stimulation;
- The need for emotional love and security;
- The need for social contact and relationships;
- The right to have their needs met and safeguarded;
- The right to be protected from neglect, abuse and exploitation;
- The right to be protected from discrimination;
- The right to be treated as an individual.

2. CHILD PROTECTION PROCEDURES

All Alert staff and contractors are required to adhere to the following child protection procedures in order to protect children and young people with whom we work, and also to protect themselves and Alert from allegations of misconduct:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets). Never allow yourself to be left alone or make gratuitous physical contact with a child or young person (there may be occasions where a distressed participant needs comfort which may include physical comforting and staff should use their discretion to ensure that it is appropriate and not unnecessary or unjustified contact.) Be aware of the limits within which such contact should take place and of the possibility for misinterpretation of such contact;
- Treat all children equally, and with respect and dignity;
- Ensure that children are protected from discrimination on any grounds, including ability and challenge discriminating comments and behaviour. Activities should be designed to include all children and to promote positive attitudes towards differences;
- Be clear about what the objectives of the activity are before it begins and always put the welfare of each child first e.g., before achievement of goals;
- Maintain a safe and appropriate distance with children (e.g. it is not appropriate to have an intimate relationship with a child or to share a room with them during residential activities);
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process;
- Ensure that if children of mixed genders are to be supervised, they should always be accompanied by a male and female member of staff. However, remember that same gender abuse can also occur;
- Adults should not enter children’s rooms (unless it is essential because a child is ill and in these circumstances, adopt the procedures set out above in relation to private interviews). Staff should never invite children into their rooms;
- Conduct yourself in a manner that sets a good example to children and young people. Be an excellent role model – this includes not smoking or drinking alcohol in the company of/whilst responsible for children;
- Give enthusiastic and constructive feedback rather than negative criticism;
- Never use physical force. If it is necessary to restrain a child or young person because they are an immediate danger to themselves, others or property, then the minimum amount of force should be used for the shortest amount of time. Remain calm and get
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the attention and support of other staff. The incident should be recorded in writing, with a witness statement (where possible), immediately afterwards;

- Never use physical punishment;
- Secure parental consent in writing if the need arises to administer emergency first aid and/or other medical treatment where the child is under 16. First aid given should be recorded in writing and reported to the lead member of staff who will inform the parent or carer;
- Keep a written record of any injury that occurs, along with the details of any treatment given;
- Request written parental consent if staff are required to transport young people in their cars;
- Question any unknown adult who enters the protect area/premises and/or who attempts to engage with the children.

**VULNERABLE ADULTS**

1. POLICY STATEMENT

Alert believes all adults at risk ('vulnerable adults') have a right to protection from harm. This includes physical, sexual and emotional abuse as well as exploitation, neglect or bullying. Alert will not tolerate any abuse, exploitation or neglect of vulnerable adults: it being against the beliefs, values and aims of the organisation. Alert’s Vulnerable Adult Policy formalises this and is the framework which applies whenever Alert works with adults at risk.

This framework should be sufficient to enable Alert staff, partners and other associates to take appropriate and timely safeguarding action locally allowing for local demographics and environmental characteristics. However, they should all reflect the key Principles set out below:

**Principles**

- **Empowerment** - Presumption of person-led decisions and informed consent.
- **Protection** - Support and representation for those in greatest need.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** – Proportionate and least intrusive response appropriate to the risk presented.
- **Partnership** - Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in delivering safeguarding.

2. PRINCIPLES INTO PRACTICE

**Empowerment** - We give individuals relevant information about recognising abuse and the choices available to them to ensure their safety. We give them clear information about how to report abuse and crime and any necessary support in doing so. We consult them before we take any action. Where someone lacks capacity to make a decision, we always act in his or her best interests.

**Protection** - Our local complaints, reporting arrangements for abuse and suspected criminal offences and risk assessments work effectively. Our governance arrangements are open and transparent and communicated to all.
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**Prevention** - We can effectively identify and appropriately respond to signs of abuse and suspected criminal offences. We make staff aware, through provision of appropriate training and guidance, of how to recognise signs and take any appropriate action to prevent abuse occurring. In all our work, we consider how to make communities safer.

**Proportionality** - We discuss with the individual and where appropriate with partner agencies the proportionality of possible responses to the risk of significant harm before we take a decision. Our arrangements support the use of professional judgement and the management of risk.

**Partnership** - We have effective local information-sharing and multi-agency partnership arrangements in place and staff understand these. We foster a “one” team approach that places the welfare of individuals above organisational boundaries.

**Accountability** - The roles of all agencies are clear, together with the lines of accountability. Staff understand what is expected of them and others. Agencies recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

3. **OUTCOMES FOR ADULTS AT RISK**

**Empowerment** – Adults at risk feel consulted about the outcomes they want from the safeguarding process and these directly inform what happens.

**Protection** - Adults at risk feel they are provided with help and support to report abuse. They feel supported to take part in the safeguarding process to the extent to which they want and to which they are able.

**Prevention** - Adults at risk feel they are provided with easily understood information about what abuse is, how to recognise the signs and what they can do to seek help.

**Proportionality** - Adults at risk feel confident that the responses to risk will take into account their preferred outcomes or best interests.

**Partnership** - Adults at risk feel confident that information will be appropriately shared in a way that takes into account its personal and sensitive nature. They are also confident that agencies will work together to find the most effective responses for their situation.

**Accountability** - Adults at risk are clear about the roles and responsibilities of all those involved in the solution to the problem.

### BULLYING AND HARASSMENT

1. **POLICY STATEMENT**

Bullying and harassment are forms of abuse and will not be tolerated under any circumstances.

The examples in the following paragraphs are not exhaustive and it is (within reason) the perception of the recipient that determines whether any action or statement can be viewed as bullying or harassment.

Where it cannot be established that there was an intention to offend, conduct will be regarded as violating a person’s dignity if, taking all the circumstances into account - particularly including the recipient's views - it would be reasonable to come to that conclusion.

The damage, tension, and conflict that bullying or harassment create for the individual, for teams, for the impact of our work and for our reputation cannot be underestimated. Therefore, bullying or harassment of colleagues or third parties will be promptly dealt with and may result in immediate termination of contract and other sanctions, as appropriate.
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2. BULLYING

Bullying is a sustained form of psychological abuse that aims to make victims feel demeaned and inadequate. It is defined as:

“Offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, which has the purpose, or effect of, intimidating, belittling and humiliating the recipient, leading to loss of self-esteem for the victim and ultimately the self-questioning of their worth, both in the workplace and society as a whole”

Bullying can range from extreme and obvious forms such as violence and intimidation to less obvious actions like deliberately ignoring someone.

Examples of obvious bullying:
- shouting or swearing at people in public and private;
- ignoring or deliberately excluding people;
- persecution through threats and instilling fear;
- spreading malicious rumours;
- constantly undervaluing effort;
- dispensing disciplinary action which is totally unjustified;
- spontaneous rages, often over trivial matters.

Examples of less obvious bullying:
- withholding information or supplying incorrect information;
- deliberately sabotaging or impeding work performance;
- constantly changing targets;
- setting individuals up to fail by imposing impossible deadlines;
- removing areas of responsibility and imposing menial tasks;
- blocking applications for holiday, promotion, or training.

Cyberbullying can be defined as the use of information and communication technologies to support deliberate, repeated and hostile behaviour by an individual or group that is intended to harm others. Typically cyberbullying involves the use of the Internet, email or mobile phones to send or post text or images intended to hurt or embarrass another person. In many cases, the spreading of offensive jokes or shocking or sexual material via phone or email may also constitute cyber-harassment.

3. HARASSMENT

Harassment is unwanted conduct (ranging from relatively mild banter to actual physical violence) that intentionally or unintentionally violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating, or offensive working environment for him or her.

As harassment can occur on a variety of grounds, anyone perceived to be different is at risk. It is unlawful under the Equality Act (2010) and may also be a criminal offence under the:
- Criminal Justice and Public Order Act 1994
- Protection from Harassment Act 1997 and Criminal Justice and Police Act 2001
- Anti-terrorism, Crime and Security Act 2001 (which cites religiously aggravated harassment as a criminal offence)

Perpetrators and managers who fail to take steps to prevent harassment, report it or investigate complaints, may be held liable for their unlawful actions.
People can be subjected to harassment on a wide variety of grounds including:

- sex or gender;
- sexual orientation;
- transsexualism (gender reassignment);
- marital status;
- race, nationality, ethnic origin, national origin or skin colour;
- disability;
- age;
- employment status, eg part-time, fixed-term, permanent, self-employed, agency worker, contractor, sub-contractor, et cetera;
- membership or non-membership of a trade union;
- the carrying out of health and safety duties;
- religious or political beliefs;
- deeply held personal beliefs;
- criminal record;
- health, e.g. AIDS/HIV sufferers, et cetera;
- physical characteristics;
- willingness to challenge harassment — being ridiculed or victimised for raising a complaint.

Examples of harassment:

- **verbal** harassment — examples include crude language, open hostility, offensive jokes, suggestive remarks, innuendoes, rude or vulgar comments, malicious gossip, and offensive songs or making insulting gender-based remarks.
- **non-verbal** harassment — examples include wolf-whistles, obscene gestures, sexually suggestive posters/calendars, pornographic material (both paper-based and generated on a computer, including offensive screensavers), graffiti, offensive letters, offensive e-mails, text messages on mobile phones and offensive objects.
- **physical** harassment — examples include unnecessary touching, patting, pinching, or brushing against another employee’s body, intimidating behaviour, assault, and physical coercion.
- **coercion** — examples include pressure for sexual favours (e.g. to get a job or promotion) and pressure to participate in political, religious or trade union groups, etc.
- **isolation or non-co-operation and exclusion** from social activities
- **intrusion** — examples include stalking, pestering, spying, etc.

**COMMUNICATIONS: MINIMUM STANDARDS**

1. **POLICY**

The following minimum standards must be observed when communicating about those with whom Alert works, especially children. Any queries regarding such communications should be directed to Alert’s Head of Advocacy and Communications: jegan@international-alert.org

- Always check what photography or filming is appropriate with an Alert representative before taking photos or videos.
- Always ask permission if you wish to take photos or videos, and explain how they will be used. In the case of a child, ask permission from the child and the child’s guardians.
- Written permission must be obtained from the individual concerned or their guardians when a photo, video or story:
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- Clearly identifies and provides substantial information about a particular person; and
- Places a person in a situation that could be damaging to their dignity, safety or reputation. For example, information about HIV status, involvement in prostitution or armed conflict.

- Be extremely sensitive to a person’s vulnerability at times of trauma or grief, and always assess how a photo, video or story will impact on the safety, dignity and well-being of the person concerned.
- Do not portray people as helpless victims. Balance human needs with positive language about what people are doing to help themselves.
- Photos and stories must not use real names or real locations, especially when communicating sensitive information. For example, HIV status or sexual abuse.

OTHER RELEVANT POLICIES

The above policies are also complemented by a range of policies and documents, available in full, accessible to and actively promoted to all Alert Staff through the intranet portal.

These include:
- Ethical Framework
- Dishonest Practices Policy
- Equal Opportunities Policy
- Core behaviours
- Performance management process
- Grievance Policy
- Disciplinary Policy
- Whistleblowing Policy

REPORTING INCIDENTS AND CONCERNS

1. POLICY STATEMENT

Informal and formal incident reporting mechanisms are available to anyone who has experienced abuse during contact with Alert or has any concerns about abuse they wish to report.

All Alert staff, partners and other associates are obliged to report any suspicions of abuse of others.

2. CONFIDENTIALITY

Alert has an overall duty of care to safeguard and promote the welfare of all who come into contact with Alert. Nevertheless, we will make every effort to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only.
3. SEEKING ADVICE

Alert recognises the sensitive nature of abuse. Whether you believe you have been subjected to abuse or you have concerns that another individual may have been, you may wish to discuss a particular situation before deciding what action to take.

Alert operates an open-door policy and employees can choose to discuss the matter with their manager on an informal basis. If this is not appropriate in the circumstances, you can discuss the situation with the next higher level of management or with a member of the Human Resources department:

Ruth Kamaria: rkamaria@international-alert.org
Irene Sullivan: isullivan@international-alert.org

Anyone giving advice will:
• ensure the conversation remains confidential as far as possible;
• listen sympathetically;
• help individuals consider objectively what has happened;
• discuss what outcome the individual would wish to see;
• draw attention to available procedures and options;
• inform the individual of the legal liabilities involved;
• help weigh up the alternatives, but without pressure to adopt any particular course;
• assist the individual in dealing with the situation (if the individual asks for help).

Note: where a serious abuse has occurred or is suspected, the formal reporting mechanism will be instituted (either instead of or in addition to the informal reporting mechanism).

FORMAL MECHANISMS

1. WHISTLEBLOWING POLICY

Alert’s Whistleblowing Policy can be found on our website: www.international-alert.org.

Any person who is aware of suspicions, allegations or actual abuse by a person involved with Alert’s work has an obligation to notify the Director of Finance and Operations immediately.

You can contact the DOF direct in any of the following ways:
• By writing to the Director of Finance and Operations at International Alert, 346 Clapham Road, London, SW9 9AP, United Kingdom. Write 'Private and confidential' on your envelope.
• By telephoning 0207 627 6857. You can leave a voicemail message 24 hours a day. Only the DOF can pick up the messages left.
• By sending an e-mail to whistleblowing@international-alert.org

It is best to put your concerns in writing and give as much information as possible - including any relevant names, dates, places and so on. The earlier you raise a concern, the easier it is to take effective action.

For a comprehensive understanding of the process of raising concerns, please refer to the full text of Alert’s Whistleblowing Policy.
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2. GRIEVANCE

Staff can bring a formal complaint against a colleague in the form of a grievance. Alert’s Grievance Policy can be found in the Staff Handbook for every office and is also available upon request from a member of the Human Resources department:

Ruth Kamaria: r.kamaria@international-alert.org
Irene Sullivan: i.sullivan@international-alert.org

For a comprehensive understanding of the grievance procedure, please refer to the full text of Alert’s Grievance Policy.

3. COMPLAINTS PROCEDURE

Alert’s Complaints Procedure can be found on our website: www.international-alert.org. Third parties can use this to bring a formal complaint against Alert or one of its staff. Alert staff can use the Complaints Procedure to bring a formal complaint against a third party with whom they have come in contact in the context of their work for Alert.

For a comprehensive understanding of how to raise a complaint, please refer to the full text of Alert’s Complaints Procedure.

4. INVESTIGATION

Alert is committed to investigating all allegations of abuse. This commitment to fully investigating every allegation is an important source of deterrence to the potential abuser.

Every disclosure is treated with the highest levels of care and professionalism using rigorous, fair, and impartial investigation procedures in respect of all parties to an investigation.

Investigations are an internal administrative process and would not therefore involve the police or judiciary. Investigations are carried out so that Alert can have the best information possible on which to base its decisions concerning Alert staff / partner / other associates conduct and consequences thereof.

5. INTERNAL REPORTING

Country Managers and London-based managers are required to report internally within 24 hours:

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<thead>
<tr>
<th>Details</th>
<th>How?</th>
<th>To whom?</th>
<th>Relevant policy</th>
</tr>
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<tbody>
<tr>
<td>All Alert staff, partners and other associates are obliged to report any suspicions of abuse.</td>
<td>In writing</td>
<td>Director of Finance and Operations <a href="mailto:whistleblowing@international-alert.org">whistleblowing@international-alert.org</a></td>
<td>Whistleblowing</td>
</tr>
<tr>
<td>Safeguarding contraventions</td>
<td>In writing</td>
<td>Director of Finance and Operations</td>
<td>Safeguarding Policy</td>
</tr>
<tr>
<td>Formal grievances</td>
<td>In writing</td>
<td>Director of Finance and Operations</td>
<td>Grievance Policy</td>
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<table>
<thead>
<tr>
<th>Formal complaints</th>
<th>Director of Finance and Operations</th>
<th>Complaints Policy</th>
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<tbody>
<tr>
<td>Disciplinary action taken against Alert staff, partners or other associates</td>
<td>In writing</td>
<td>Disciplinary Policy</td>
</tr>
<tr>
<td>Threatened or actual legal action taken out against Alert, Alert staff, partners or other associates</td>
<td>In writing</td>
<td>Disciplinary Policy</td>
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Bearing in mind the requirements of Data Protection legislation, the Director of Finance and Operations will:

- Notify the following (as appropriate):
  - Senior Management Team
  - Board of Trustees
  - Section leader
- Keep a log of reports received and the outcomes of investigations for reporting purposes to Alert’s Board of Trustees.

### 6. NOTIFYING APPROPRIATE AUTHORITIES

Following an investigation Alert will notify the appropriate authorities if it judges that:

- It is required by the terms of the contract held with a Donor;
- It is required by the terms of our registration with the Charities Commission and/or Companies House;
- A crime has taken place.

Extreme caution will be exercised to ensure that

- Confidentiality can be ensured;
- The victim(s) will not be subject to further abuse, disrespect or violence.

### 7. PENALTIES

**Directly Contracted Individuals**

Any directly contracted individual who breaches this policy (including the above clause on confidentiality) will face disciplinary action, which could ultimately result in dismissal for gross misconduct. Depending upon the nature and extent of the allegations legal action may also be brought against them.

**Third Parties**

Any third party involved with Alert’s work who is found to be in breach of this policy (including the above clause on confidentiality) will be deemed in breach of contract and the contract will be terminated with immediate effect. Depending upon the nature and extent of the allegations, legal action may also be brought against them.
8. MALICIOUS COMPLAINTS

Where a complaint is blatantly untrue and has been brought out of a malicious motivation, the complainant will be subject to the organisation's disciplinary procedure, as will any witnesses who have deliberately misled the organisation during its investigations.

VERSION CONTROL

<table>
<thead>
<tr>
<th>Version</th>
<th>Changes</th>
<th>Author</th>
<th>Date</th>
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<tbody>
<tr>
<td>1.1</td>
<td>Changed all references to Chief Operating Officer to Director of Finance &amp; Operations. Linked to policies on intranet for ease of access</td>
<td>Ruth Horsfall</td>
<td>Aug 2020</td>
</tr>
</tbody>
</table>