



IDA Policy on Safeguarding and Management of Malpractice and Misconduct

Revised October 2024

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1. Introduction

1.1. About IDA

The International Disability Alliance (IDA) was established in 1999 and is a network of eight global—and, six regional organizations of persons with disabilities (DPOs), representing the voice of the estimated one billion persons with disabilities worldwide. IDA is a network representing members that are organizations of persons with disabilities. IDA's unique composition as a network of international DPOs allows it to act as an authoritative and representative voice of persons with disabilities in the United Nations (UN) system, both in New York and Geneva.

IDA's mission is "To advance the human rights of persons with disabilities, as a united voice of organizations of persons with disabilities, utilizing the Convention on the Rights of Persons with Disabilities and other human rights instruments". IDA's longer-term goal is that "the United Nations framework (the General Assembly, Security and Human Rights Councils, treaty bodies and development agencies), bilateral and multilateral development agencies, regional organizations and human rights instruments contribute to create an enabling environment for DPO advocacy and government capacity to implement the UN CRPD at national level".

1.2. IDA operating context and risks

As an alliance actively engaged in the promotion of human rights for discriminated groups, IDA has evidence of the **far higher levels of abuse experienced by persons with disabilities, women and girls, children, indigenous people, compared to others**. Stigma and negative cultural norms contribute to put these groups at risk of violence and abuse, including factors such as stereotyping, prejudice, discrimination, isolation, difficulty in protecting oneself or inadequately being made aware of and/or communicating that abuse has occurred.

IDA wishes to ensure that its own practices include adequate measures to protect all employees, board members, or third parties engaging with IDA's work (such as participants to workshops and training organized by IDA) from any form of violence or abuse, with particular attention to most discriminated groups.

IDA's activities are political in nature, and may expose IDA employees, board members or third parties engaging in IDA's work to power dynamics at different levels (from local to global levels), associated with **risks such as intimidation and harassment (including in online spaces), judicial harassment, bribery or corruption, or other forms of malpractice**. This may be particularly challenged when IDA operates in undemocratic societies or conflict environments.

Civil society is arguably no more immune to potential corruption than companies or governments. IDA commits to combat any form of corruption, fraud, malpractice, power abuse by any employee, board member or third party engaging with IDA's work.

Linked to IDA's mandate, mission and guiding principles, this Policy acknowledges risks and defines appropriate standards and mitigation measures.

2. Objectives and Scope of the Policy

2.1. Objectives of this Policy

The objectives of this Policy are to:

- **Keep children and adults safe** and ensure their integrity and the full respect of their human rights in the context of IDA's work, in line with IDA's vision, mission and guiding principles¹;
- **Combat harmful and illegal practices**, including but not limiting to: trafficking, exploitation, fraud, misconduct, bullying and harassment (including sexual harassment), violence and abuse;
- **Ensure the highest standards of behaviour** from IDA associates and minimizing the risk of abusers impacting IDA, IDA stakeholders and IDA's work;
- **Preserve the reputation of IDA**, including IDA's integrity and safeguarding IDA and its representatives from false allegations or from accusations of operating within an unclear, risk-prone framework.
- It also contributes to open and accountable governance and management across IDA as an alliance.

2.2. Scope of this Policy

Who does this Policy cover?

Any employee, board member or third party engaging directly in the work of IDA. This includes all employees, interns, volunteers, board members, consultants, suppliers, visitors (termed collectively as IDA associates) or individuals taking part in any activities organized by IDA such as workshops, training, or attending other events upon IDA invitation.

2.3. Definitions²

Abuse	Abuse occurs when an individual or individuals hurts another adult or child, either intentionally or unintentionally. Abuse typically falls into five categories: physical, sexual, emotional, neglect and financial.
Bullying	Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.
Complaint	When an employee, board member, associate or other stakeholders or service users/participants raises a concern, a dissatisfaction or an instance of malpractice concerning IDA.
Conflict of Interest	A situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. IDA defines conflict of interest for its board members in the IDA Code of Conducts (board and staff). Board members will ensure that they do not use their positions in such a way that a conflict of interest between the interest of the organization and their personal or professional interest can arise, and

¹ For more information, see: <http://www.internationaldisabilityalliance.org/content/our-principles>

² Some of these definitions are adapted from relevant policies of INGOs such as Sightsavers and CBM

need to make full disclosure of any interest in a proposed transaction with the organization, before any discussion or negotiation of such transaction.

Corruption	The abuse of entrusted power for private gain. It is interpreted here to include such corrupt practices as bribery, fraud, extortion, collusion, conflict of interest, and money laundering. In the context of this Policy, it includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust. This may include gifts other than money, such as free goods and holidays, or special personal services provided for the purpose of, or liable to result in, an improper advantage or that may result in moral pressure to receive such an advantage ³ .
Employee	An employee of the IDA Secretariat/ staff member.
Harassment	Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
Line manager	The immediate manager of the employee. Sometimes it may be appropriate for an alternative manager to act in their place
Malpractice or wrongdoing	Any type of behaviour or action considered to be effectively or potentially illegal, unethical, harmful or dangerous. These include (but are not limited to): criminal offence, the breach of a legal obligation or regulatory requirement, a miscarriage of justice, a danger to the health and safety of any individual (including harassment, violence, abuse, ...), damage to the environment, bribery or financial fraud, unethical conduct (including the use of sex workers), deliberate attempt to conceal any of the above.
Safeguarding Focal Points	The individuals assigned to the role of receiving and coordinating the response to complaints, according to the principles set in this Policy. (This may include temporary focal points at particular events or activities that can receive and coordinate/escalate reports during that period to others within IDA to manage the response to that report or complaint).
Protected Disclosure	Is a disclosure of information that the member of staff reasonably believes tends to show malpractice. IDA employees or board members are protected from suffering any detriment as a result of a 'disclosure'.
Safeguarding	Safeguarding is the organisational responsibility to ensure that staff, programmes and activities "Do No Harm". In the context of this policy, it implies identifying and minimising the risk of harm to children and adults from IDA associates or activities. It involves putting in place internal policies, procedures and measures to prevent harm to staff, children, other beneficiaries/clients and communities, as well as measures and mechanisms to help the organisation respond to concerns.
Sexual abuse	Means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions ⁴ .

³ Definition Source: Global Reporting Initiative (GRI) Guidelines; accredited by the INGO Accountability Charter Ltd.

⁴ Secretary-General's Bulletin, Special measures for protection from sexual exploitation and sexual abuse, 2003.

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 ⁵
Sexual harassment	A form of harassment this is unwanted behaviour of a sexual nature which: violates a person's dignity, makes them feel intimidated, degraded or humiliated. creates a hostile or offensive environment
Survivor centred	Means seeking to empower the survivor by prioritising her/his rights, needs and wishes. It means ensuring that survivors have access to appropriate, accessible and good quality services including health care, psychological and social support.
Third parties	In the context of this policy, third parties mean all individuals and organizations engaging directly in the work of IDA. This includes all fellows, interns, volunteers, consultants, suppliers, visitors to any of IDA premises or individuals taking part in any activities organized by IDA such as workshops, training, or attending other events upon IDA invitation. This includes Personal Assistants when accompanying others to IDA events.
Whistleblowing	When an employee or board member of IDA raises a concern relating to any malpractice or danger as defined above, that is not specifically directed that them personally . Whistleblowing is one particular form of complaint, please also refer to 'complaint'.

3. Commitments and principles underpinning this Policy

3.1. Commitments of IDA

Human rights as the foundation of how we work: In line with its mandate, IDA is committed to promoting and respecting all human rights of all adults and children, throughout all aspects of its work. This Policy is underpinned by human rights treaties, including but not limited to:

- The UN Convention on the Rights of Persons with Disabilities (CRPD) including its general principles (article 3) and obligation of non-discrimination (article 5), special provisions for the protection of children with disabilities from cruel, inhuman or degrading treatment or punishment (article 15) and exploitation and abuse, including gender-based violence (article 16). Safeguarding persons with disabilities or other groups from abuse, mistreatment etc., must not in any way prevent them from enjoying their human rights on an equal basis with others.
- The UN Convention on the Rights of the Child (CRC), with specific reference to article 19 on protection from all forms of violence, injury, exploitation, abuse, neglect, mistreatment and sexual abuse;
- The Convention on the Elimination of Discrimination Against Women (CEDAW), with specific reference to equality in the workplace (article 11)

Working environment: IDA is committed to creating a working environment in which individual differences are valued and respected. All employees have a right to work in an environment that is free from all forms of bullying, discrimination and harassment.

Transparency and accountability: IDA is committed to upholding the principles of transparency and accountability as central to good governance. IDA is also committed to good management practice. This Policy

⁵ Secretary-General's Bulletin, Special measures for protection from sexual exploitation and sexual abuse, 2003.

contributes to good governance and management by defining how IDA deals with situations of malpractice, by committing to enforcing this Policy and accounting for it.

No engagement with organizations supporting malpractice: IDA is committed not to directly support any organization, initiative or activity that causes, promotes or contributes to all types of malpractice, wrongdoing, illegal practice or danger as defined above. IDA is also committed not to knowingly engage, contract or work with any entity or organization that causes, promotes or contributes such practices.

Expectations towards members and partners: IDA will demand its members and partners (including suppliers⁶) to fight such practices, including by signing this policy and requiring compliance with it (unless they can demonstrate they have an equivalent enforceable policy), and will ensure that staff and board members are informed of and understand this policy and how to enforce it.

3.2. General principles

In dealing with the cases/ situations covered by this Policy, IDA will be guided by the following:

- **Survivor-centred :** IDA puts the survivor at the centre of both efforts to prevent harm and responding to harm if and when it occurs.
- **Timely management:** All complaints will be taken seriously and dealt with without unreasonable delay.
- **Proportionality:** Every effort will be made to first resolve grievances promptly through discussion and/or mediation, unless required otherwise by the gravity or nature of the situation. IDA will seek the least intrusive response appropriate to the risk presented and in line with internal policies and processes and/or in consideration to any legal requirement, while taking the best interests of the survivor and subject of complaint into consideration
- **Prevention:** It is better to take action before harm occurs. Risk management as prevention is key to ensuring harm does not occur in the first place, IDA will put in place risk management measures to identify and mitigate safeguarding risks in its activities and events; this includes also putting in place safe recruitment processes, safe communication measures and due diligence processes around its procurement and partnership processes. In all aspects covered by this Policy, IDA is committed to develop, maintain and regular review of risks, and to remain aligned and co-operate with public authorities in charge of combatting such practices.
- **Evidence-based decision:** No decisions will be taken until a reasonable investigation to establish the facts has taken place
- **Ensuring a right to respond:** Any individual accused of inappropriate behaviour or acts will be spoken to as part of any investigation and will have the chance to respond to the allegations before any final decision is made
- **Provision of reasonable accommodation:** Reasonable accommodation will be provided if there are any factors that might affect an individual's ability to present or answer a complaint (refer to IDA Reasonable Accommodation Policy)
- **Confidentiality:** Appropriate levels of confidentiality will be ensured, carefully considering on a case-by-case basis what information is necessary to disclose to the employee raising the grievance, any respondent and/or any other affected or interested party. Whenever reasonably possible, IDA will also seek to obtain explicit consent to the disclosure of information before proceeding. Unless advised otherwise by IDA, concerned individuals should not discuss the matter with other employees or board members or third

⁶ IDA will remove suppliers from IDA approved supplier list where companies in the supply chain are found to be involved in violation of human rights and there is no willingness to address the situation within a reasonable time if requested to do so.

- parties outside the complaint process. Cases will be documented and information will be kept confidentially.
- **Accountability:** In all aspects covered by this Policy, IDA commits to account for its developments, accept responsibility for them where directly engaged, and to disclose the results in a transparent manner, pending reserves linked to confidentiality.

4. Safeguarding Policy

4.1. Roles and Responsibilities

Organisation: IDA will work to ensure the general principles are upheld by building a culture of openness to enable issues and concerns about safeguarding to be raised and discussed and building a sense of accountability between staff so that potential poor or abusive behavior can be challenged.

IDA as a membership organisation also has different responsibilities for safeguarding within partnerships and within the membership. The diagram below identifies what applies within these different relationships.



- The greatest area of control for safeguarding that IDA has is the **Board and IDA Secretariat**. This responsibility is put in place through IDA’s Safeguarding Policy, the CoC and other organisational policies and procedures which cover staff and so on.
- The second level are the **events, projects etc. managed by IDA**. All events or projects must be managed by an organisation that has the necessary safeguards in place in order that the event or activity can be implemented safely. There is less control over these in the sense that there will be others participating in the event or activity but as IDA is managing these their Policy etc. will apply. The event or activity also requires a robust risk assessment which determines what safeguards will be applied to that event or activity

Individuals: Safeguarding is a shared responsibility and IDA recognises that often employees will be the first to know when there is cause for concern. IDA staff and board members must create and maintain an environment that prevents harm and abuse. The Board of IDA and the Executive Director have a particular responsibility to support and develop systems that maintain this environment. All IDA associates have a responsibility to act with due care and attention to safeguard the wellbeing of every person. All individuals should remain vigilant, be prepared to take action and understand what to do in the event there is a concern to raise.

Executive Director: has the responsibility and authority to take actions as necessary to ensure the effective implementation of this Policy.

IDA's Board of Trustees: IDA's Board of Trustees have a duty of care to ensure that appropriate policies and procedures are in place to prevent abuse from taking place and to appropriately manage any concerns. They also have a responsibility to ensure that all appropriate issues are reported in line with best practice.

Focal Points: IDA will appoint at least 2 Focal Points (1 at the Board and 1 at the IDA Secretariat level) at global level and will identify alternative resource person as relevant. Where appropriate, IDA may require that temporary Focal Points are designated to report to the global PFPs in relation to a specific event (e.g. Bridge CRPD-SDGs training module).

Organisations being fiscally sponsored by IDA: IDA will retain control over and responsibility for finances and apply IDA's safeguarding measures.

Partners: Organisations delivering work with or on behalf of IDA need to meet safeguarding standards which are either set by the organisation providing funding or can be agreed within the partnership.

Members: Organisations that are members of IDA will commit to a set of safeguarding standards and encouraged to work towards them. IDA will share training resources, tools and opportunities for exchange among members, and may provide support to strengthen members' practices upon request.

4.2. Code of Conduct

All IDA employees and board members are required to understand their responsibility to keep adults at risk and children safe, and to sign and abide by the IDA Code of Conduct, which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. It also serves to guard the name and reputation of IDA and its representatives from false accusations. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action.

4.3. Recruitment and selection

IDA will ensure that recruitment and selection procedures include the necessary safeguards, as described in IDA's HR Manual. Safeguards will include determining the contact and therefore risk of each position, ensuring that candidates provide the necessary information to demonstrate identity and competency for the role, undertaking due diligence regarding employment history and background checks.

4.4. Education and training

IDA will ensure employees, board members, partners and other third parties that engage with IDA are made aware of this Policy. Managers have a special duty and responsibility to support the enforcement of the Policy with their teams. IDA will ensure access to regular training updates and refresher courses and/or online resources to ensure that the policy continues to be embedded and that staff are made aware of changes and developments to the policy and its implementation.

4.5. Risk Management

IDA will ensure that its risk management processes include safeguarding. IDA will assess potential risks of activities and those with whom IDA engages to undertake those activities. IDA does engage with persons who might be particularly at risk of harm and abuse and will ensure that those risks are assessed and mitigated, including those of children if any when IDA engages with them⁷.

⁷ Situations may cover, inter alia: support to participation of children/ youth as human rights defenders to conferences or events promoting the rights of the child; organizing events where adult participants are likely to be accompanied by children: e.g. lactating mothers attending training with a child or bringing a childminder; visiting or engaging with any local organizations/ DPOs working with children, e.g. refugee camps, rehabilitation centers, schools, etc.

IDA will regularly review risks, lessons learned and adjust the current Policy as needed.

4.6. Communications

IDA will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared. IDA will ensure that adults and children are represented in an appropriate way that does not victimize or sexualize them.

4.7. IDA Members

IDA and its members commit to safeguarding within the membership arrangements through sharing safeguarding standards, recognizing that different contexts and needs may mean some diversity in approaches. IDA and members will regularly assess whether capacity building to meet relevant safeguarding standards.

4.8. Working with Partners

All partner organisations that work with IDA (including IDA members that are delivering work on IDA's behalf) are required to have in place and adhere to minimum standards for safeguarding and/or the policies and procedures that relate specifically to that program or project.

During grant application and contracting processes, IDA will assess the need for partners to comply with safeguarding standards, and where activities or the grant conditions require a level of compliance with IDA's safeguarding standards, partners will describe how they meet the standards and/or plans to ensure any areas of non-compliance will be met before, or within an agreed period after, the commencement of the grant/contract.

Compliance with the agreed minimum standards will be written in to all relevant contractual, partnership agreements and grantee contracts and will be monitored via existing reporting and audit arrangements.

5. Fraud and anti-corruption policy

5.1. Purpose of the fraud and anti-corruption policy

The diversion of resources or misuse of funds or power for personal gain compromises IDA's guiding principles and commitments and represents a serious breach to IDA's code of conduct, statutes and internal rules. Any allegation that IDA is linked to corruption could seriously damage IDA's reputation - undermining its role, legitimacy and credibility as an alliance representing the estimated 1 billion persons with disabilities worldwide.

IDA must act, and be seen to act, in a way that is honest and transparent. This section of the policy supports IDA's existing policies and standards, reinforcing our commitment to foster a culture in which corruption is never acceptable and not tolerated. It further clarifies standards of conduct for the prevention of corruption and provides a common foundation for the development of procedures to manage IDA corruption risk at all levels.

5.2. Fraud and corruption

Fraud and/or corruption, including but not limited to misuse of funds, on the part of any IDA employee or board member or any third party (partner, consultant, supplier etc.) in their engagement with IDA, is prohibited. This applies to any work, service or project contracts:

- Employees who commit fraud/misuse of funds, or a corrupt act, fail to report knowledge of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment.
- Board members who fail to comply with this policy are subject to removal, as per the Statutes of IDA and Board Code of Conduct.
- Third parties who fail to comply with this policy will have their agreements and/or contracts with IDA terminated. IDA may also seek restitution or prosecution or other legal remedies.

“Fraud” is an intentional act of deception or misrepresentation made for personal gain (including financial gain) or to cause harm to another party. It involves the deliberate use of false information, manipulation, or concealment of facts to obtain an unjust advantage or deprive someone else of their rights or property.

“Misuse of funds” is the improper, unauthorized, or unethical use of financial resources that have been allocated for specific purposes or projects. This includes spending funds on activities or expenses that do not align with the organization's mission, donor requirements, or legal obligations. Examples of misuse include:

- Redirecting funds to personal or unrelated expenses.
- Exceeding budget limits without proper authorization.
- Falsifying receipts or records to cover inappropriate expenditures.
- Using restricted funds for other purposes.

No employee or board member, or any third party acting on behalf of IDA or dealing with IDA, shall offer to pay a bribe, or pay a bribe, nor shall they solicit the payment of a bribe, or accept a bribe in conjunction with any aspect of IDA’s activities.

For example, no employee or board members should accept a gift or payment in exchange for any privilege that the employee or board member may grant in return, for example selection on a high-level panel organized by IDA, favoritism in sub-granting or other.

IDA engages with a wide scope of organizations and is not able to systemically assess the probity of these organizations and individuals representing them. However, if significant concerns or evidence are brought to our attention, IDA will carefully consider the situation and reserves the right to not engage with the concerned organization or its representative if there are risks for the reputation of IDA being associated to malpractice or linked to the breach of anti-corruption rules set by entities funding IDA’s work.

6. Reporting and Response Procedures

6.1. Purpose of the reporting and response procedure

The reporting and response procedure is set up to enable an employee, board member of IDA or third party to raise a concern/ dissatisfaction.

IDA uses a single procedure to handle all complaints and reports, including when the person reporting is the one directly concerned, and when the person reporting is not directly concerned personally (in this case the complaint is called whistleblowing).

The reporting and response procedure aims to provide guidance and protection to members of staff, board or third parties to share about a malpractice and trigger an appropriate process of investigation and reparation in response.

6.2. Complaints and reports

Timely reporting

Where possible, complaints should be made promptly following the date of the act complained of. Limitation in time is guided by the applicable national legislation for concerned cases (e.g. in some countries there is no time limit for reporting a rape case, while other sexual offences have a 20-year time limit).

We encourage all whistleblowing claims to be made promptly. While it is understandable that a victim may need time to report, third parties have a responsibility to report rapidly following the date of knowing about a concern.

Confidentiality

IDA will treat all complaints in a confidential and sensitive manner. The identity of any member of staff or board filing a complaint may be kept confidential as long as it does not hinder any investigation. However, the individual making the complaint may need to provide a statement as part of the evidence gathering process and their identity may be revealed or implied as part of the investigating process.

Whistleblowing: while confidentiality is an express term in the contract of employment of staff, where a member of staff or board discovers information that they believe shows malpractice, unethical conduct or illegal practices within IDA, this Policy allows them to disclose the information independently of line management and without fear of reprisal for breach of confidentiality.

IDA encourages staff or board members or any other third parties to put their name to any disclosure they make. Concerns expressed anonymously are less powerful and may be less easy to investigate; however, they will be considered and reviewed at IDA's discretion, depending on the seriousness of the issues raised, the credibility of the concern, the likelihood of confirming the allegation from attributable sources.

IDA will treat all disclosures in a confidential and sensitive manner. The identity of any member of staff or board or other third parties making an allegation may be kept confidential as long as it does not hinder any investigation. However, the individual making the disclosure may need to provide a statement as part of the evidence gathering process and their identity may be revealed or implied as part of the investigating process.

6.3. Reporting procedure

Here are the steps to follow:

1. If a member of staff or board believes that they are direct victim or survivor of or have knowledge of a matter or practice within the scope of this policy, they should make the disclosure immediately to their line manager who will inform the IDA Policy Focal Point, or directly to the IDA Policy Focal Point of their

choice (see [Contacts](#)). If the matter or practice is more serious and/or concerns the line manager, then it should be reported to the IDA Policy Focal Point of their choice.

2. Exceptionally, if the member of staff believes it is inappropriate for any reason to report the concern to any of the Policy Focal Point, they may report it to either the Executive Director, or to the Focal Point on the Board of Trustees
3. If the report is from a third party and concerns the behaviour of IDA staff or how an IDA supported event or activity has impacted on someone, the report can be made through the reporting email (concerns@ida-secretariat.org), which can be found on IDAs website.
4. The incident should be reported using the appropriate template (see [Annexes](#)). This will enable proper documentation to determine if an investigation is needed. Any reasonable personal expenses incurred in making the disclosure can be claimed as a reimbursable business expense.

6.4. Response procedure

All complaints or reports will be taken seriously and investigated fully, swiftly, impartially and in confidence. Cases reported will be addressed within a period of 6 working days. IDA staff are expected to cooperate fully in any investigation, and refusal to cooperate may result in disciplinary action. IDA will contact local or national authorities in a timely manner as appropriate given the severity of the incident and where required by law and will work in collaboration with authorities to aid their investigation to the extent possible. IDA will support referral of victims to support services (mobilizing contacts and existing directories such as the <https://nomoredirectory.org/>).

Protection

IDA will not tolerate any retaliation against those who report suspected prohibited conduct in good faith or who participate in investigations. While an investigation is ongoing, IDA will take all measures deemed appropriate to protect and prevent the complainant from further exposure to abuse, harassment or other motive of complaint. This may include temporary suspension or reduced involvement of the accused in IDA's work until the investigation is concluded. IDA will do so in a way that preserve the confidentiality of the case investigated and of the parties involved, preserving the reputation of the subject of complaint until the case is closed and proof is established.

Those who raise a complaint which is not upheld, but who did so with a reasonable belief that the matter required investigation will not be penalized for raising a legitimate concern. IDA as an alliance of representative organizations operates in a context that may be highly politicized, and therefore board members/ elected officials may be subject to denunciations, negative public campaigning (including on social media) aimed at undermining their credibility as leaders, which may be motivated by political competition rather than good faith. In case of a complaint/ whistleblowing claim of this nature, IDA will deal with such situations with particular vigilance and concern for preserving the person's reputation as long as an investigation is under process and not complete. This may include 'indirect' measures to manage risks (such as calling off a travel for logistical reasons rather than disclosing that an investigation is under process – to preserve the person from public opinion's reaction until the investigation is completed).

Disciplinary measures

Where this policy has been breached, we will act promptly to eliminate the offending conduct, impose disciplinary action up to and including dismissal, and take any other appropriate remedial action. This will be without prejudice to criminal proceedings.

Disciplinary action may also be imposed on individuals who fail to report allegations of sexual exploitation, sexual abuse or sexual harassment, who fail to cooperate with an investigation or who give false or misleading information at an investigation or those who maliciously submit a false report. See the Disciplinary policy for details.

Reporting to donors and regulatory bodies

In some circumstances, IDA may be required by its donors, regulators or via legal action to disclose allegations and actions taken to address the allegations. When providing such information to donors, regulators or law enforcement, IDA will seek to limit the distribution of this information to the extent possible and allowed by law, and when possible and in accordance with laws, will seek assurances that the information remain confidential.

7. Annexes

7.1. Contacts

Email to report concerns: concerns@ida-secretariat.org

7.2. Diagram for Reporting Procedure

The process for reporting safeguarding concerns is detailed in a flow chart on the following page.

Alternative text describing the reporting flowchart:

Process for reporting safeguarding concerns

You have information about or you are concerned about a situation, what should you do?

If it does not seem one of the forms of malpractice described in the policy, speak about it with your line manager, a trusted colleague, or the chair of the Board.

If it is possibly one of the forms of malpractice described in the policy:

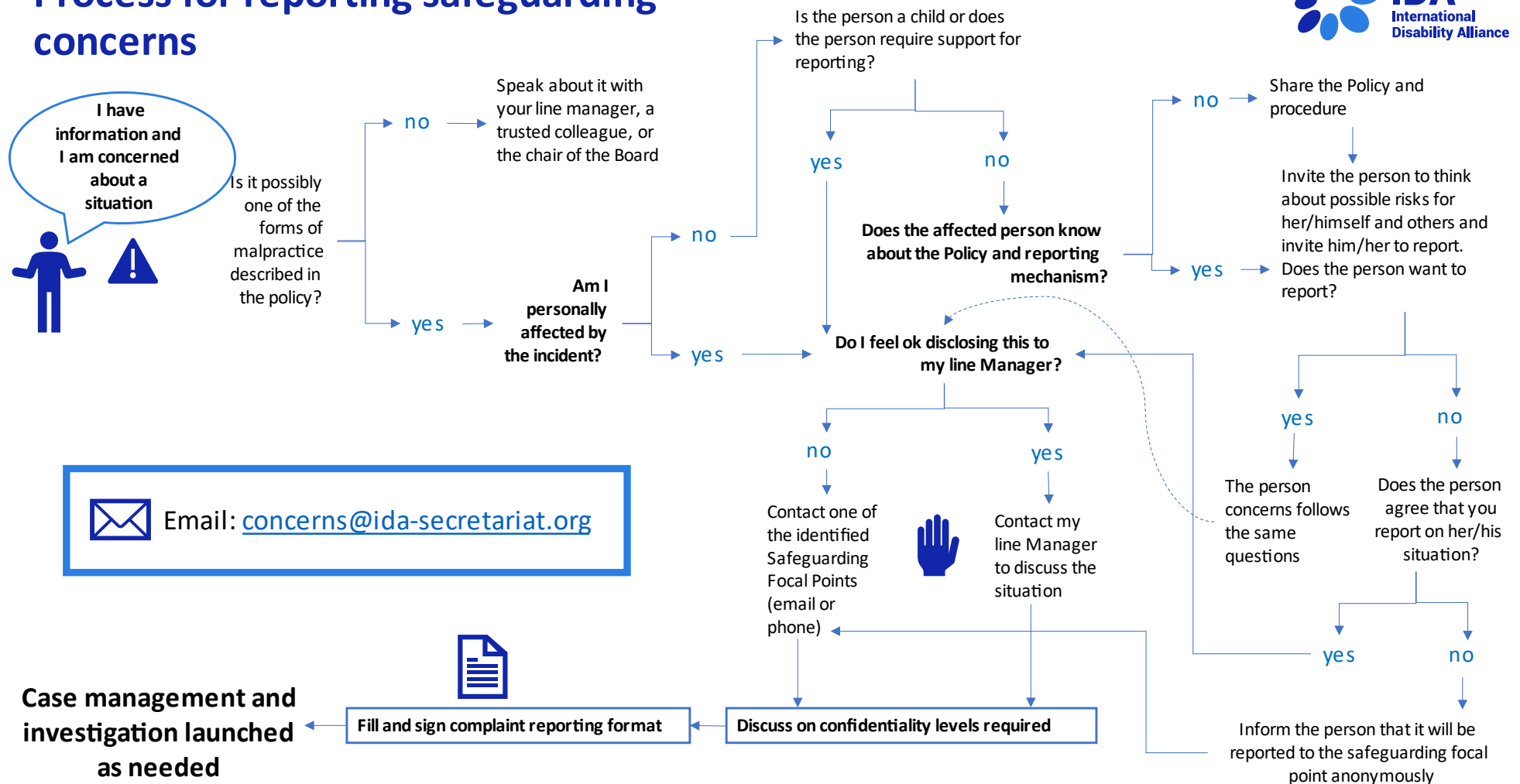
1. *If you are not the one personally affected by the situation, but this concerns a child or someone who may require support for reporting, please disclose this to either your line manager or one of the safeguarding focal points*
2. *If you are not the one personally affected by the situation, and this does not concern a child or someone who may require support for reporting, please inform the person about this policy and procedure for reporting (in case s/he does not know about it) and invite him/her to think about possible risks for her/himself and others and to report using this process*
 - a) *If the person does not want to report, suggest that you could report on his or her behalf; if the person does not want this, please inform him/her that you have an obligation to report it to the safeguarding focal point but this will be done anonymously*
 - b) *If the person agrees to report, s/he should disclose this either to his/her line manager or one of the safeguarding focal points*

The email to use for reporting is concerns@ida-secretariat.org

3. Any concern reported to your manager or a safeguarding focal will be considered seriously. It will be important to discuss and share any concerns to handle confidentiality properly. You will fill and sign a complaint using the reporting format.

The case will be handled by the line manager and/or safeguarding focal point who will decide on the appropriate response, including launching an investigation process if required.

Process for reporting safeguarding concerns



7.3. Template for reporting staff incident



Safeguarding and Management of Malpractice and Misconduct - Complaint Reporting Form

This form is to report a complaint for any behaviour or incident prohibited under the scope of the IDA Policy on Safeguarding and Management of Malpractice and Misconduct. The person reporting the complaint may be directly affected or reporting an incident affecting another person.

Note that to enable appropriate follow-up it is preferred if name and contact details are provided, by complaints can also be made anonymously.

Please refer to the complete Policy document for more information on the scope of the Policy and procedure to follow.

Link with IDA:

- ☐ IDA employee, please specify your position:
- ☐ IDA board member
- ☐ Member of IDA member
- ☐ IDA partner
- ☐ Other, please specify:
- ☐ I am not sure

Contact email:

Date of reporting:

Date/ time of the incident reported:

Name of the person who you believe is responsible of the negative/ prohibited behavior:

If the negative/prohibited behavior was towards another person, please identify this person:

Please identify any witness:

Describe the incident(s) as clearly as possible ("who, what, when, where, why").

Include a full description of the event(s), verbal statements (threats, requests, demands, etc.), the location, and what, if any, physical contact was involved:

How did you or the person concerned (if not you) react (or not)?

What contact did you or the person concerned (if not you) have with the person responsible for the negative/ prohibited behaviour before the first incident?

This complaint is based upon my honest belief that (NAME OF THE RESPONSIBLE PERSON) is responsible for a behaviour that is prohibited as per IDA Policy on Safeguarding and Management of Malpractice and Misconduct affecting me / or (NAME OF THE PERSON).

I hereby certify that the information I have provided in this complaint is true, correct and complete to the best of my knowledge.

Date

Signature