



Safeguarding Policy

1. Introduction

The Model Alliance (MA) is a 501(c)3 non-profit organization which aims to advance fair treatment, equal opportunity, and sustainable practices in the fashion industry, from the runway to the factory floor. Our work is centered around the truth that despite fashion’s glamorous façade, the industry is rife with human rights abuses and has been built on the backs of women and girls across the globe who experience debt bondage, sexual abuse, and human trafficking. That’s why we’ve pioneered a new model of labor activism – one that centers workers’ expertise to establish meaningful standards and ensure dignified working conditions for the children and adults who work in the fashion industry. As a grassroots organization, we are internationally recognized as a leading voice for labor rights in the fashion industry, and our strategic approach to research, education and advocacy has helped us establish a track record of success.

2. Model Alliance and Safeguarding

Promoting the safety and welfare of the Model Alliance worker community is at the heart of all our activities. Model Alliance was set up to give fashion workers a voice and to campaign for transformative change in the global fashion industry. Through its work Model Alliance aims to lead the effort to create labor protections for fashion workers and call for transparency and accountability across global supply chains in the fashion industry.

Model Alliance gathers information about the experiences of fashion workers through research, directly or in collaboration with academic institutions. All research conducted directly by Model Alliance or commissioned from external institutions reflects the following ethical principles: voluntary participation, informed consent, anonymity, confidentiality, potential for harm, and the communication of results. Findings from past research can be accessed here: [Published — Model Alliance](#)

Model Alliance’s direct contact with children and vulnerable adults is through the organization’s online support service, MA Support. Model Alliance assists working and aspiring models and creatives with complaints about inappropriate on-the job conduct, agent issues, and other work-related problems through its discreet grievance reporting service. This service provides support and directs victims of abuse and exploitation to reporting and support services. Model Alliance has appropriate processes in place to report child victims of abuse and exploitation to appropriate statutory services that come through their support service.

Model Alliance also works with a Worker Council, a group of fashion workers who campaign and advocate for change in the fashion industry through sharing their own experiences. Model



Alliance ensures that members of the Worker Council are supported throughout the process of their engagement in campaigning work.

3. Scope

This policy applies to Model Alliance Board of Directors, Advisory Board, Worker Council, staff, consultants, contractors, interns, volunteers, and other personnel (collectively referred to as “Model Alliance Personnel.”)

This policy details Model Alliance’s commitment to safeguarding children and adults at risk against harm in all its activities, both within the organization and working with partners and associates.

4. Definitions

- a. **Child:** In the State of New York a child is anyone under the age of 18 years old.¹
- b. **Vulnerable Adult:** Vulnerable adults are defined as people who are unable to take care of protecting themselves against harm or exploitation for any reason. When safeguarding adults, this involves reducing and preventing the risk of harm, neglect, or abuse alongside supporting them to maintain their own lives. While most would consider vulnerable adults to be those who lack capacity, adults with full capacity can also be considered as vulnerable as well. This is when they are unable to take care or protect themselves from harm².
- c. **Sexual Abuse:** which is generally defined as subjecting another person to sexual contact without the latter's consent. New York Penal Code Section 130(3) further defines "sexual contact" to include "any touching of the sexual or other intimate parts of a person for the purpose of gratifying sexual desire of either party," and touching of the actor by the victim, as well as the touching of the victim by the actor, whether directly or through clothing³.

Further definitions relevant to the work of Model Alliance can be found here: [Sexual Violence — Model Alliance](#)

5. Model Alliance’s Safeguarding Policy Statement

¹ [New York Legal Ages Laws - FindLaw](#)

² <https://www.carecheck.co.uk/importance-of-safeguarding/>

³ [New York Sexual Assault Laws - FindLaw](#)



Model Alliance believes that everyone we come into contact with, regardless of age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages, indigenous status, or migration status has the right to be protected from all forms of harm, abuse, neglect, and exploitation and to be treated with respect and dignity.

Model Alliance will not tolerate any form of harm, exploitation to children and vulnerable adults by staff or associated personnel or within Model Alliance’s working environment.

Model Alliance’s Safeguarding Policy puts the protection of the people that work with us at the center of all we do.

Model Alliance works to Bond’s definition of Safeguarding. In its resources page⁴ Bond describes, *“Safeguarding is the responsibility of organizations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation. It is becoming good practice to think about how we safeguard everyone in our organizations at all times, including protecting staff from harm and inappropriate behavior such as bullying and harassment”*.

At Model Alliance we understand this to mean taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially the models we represent and for whom we provide a voice, adults at risk, and children, from that harm; and to respond appropriately when harm does occur from within our organization and to signpost to appropriate statutory and support services.

Model Alliance commits to having robust, accountable, and transparent systems for prevention, protection, reporting, response and learning when safeguarding risks materialize. Those systems include a duty to all actors to report incidents, allegations, and concerns, and to adopt a survivor centered approach⁵ to the alleged victim and a duty of care to the alleged perpetrator.

Consequently, Model Alliance will take reasonable steps to safeguard and protect all people associated with our work from abuse, even if these are not children and vulnerable adults.

6. Contact Us

To contact Model Alliance regarding any of the information in this document please contact our Safeguarding Lead here: safeguarding@modelalliance.org

⁴ [Safeguarding resources | Bond](#)

⁵ <https://www.endvavnow.org/en/articles/1499-survivor-centred-approach.html>

7. Model Alliance Safeguarding Framework

Model Alliance’s safeguarding framework is supported by three key pillars – **Prevention, Protection and Reporting**. These three pillars are sustained by embedding a strong safeguarding culture throughout the organization.

8. Prevention

Model Alliance will reduce the risk of harm through safer programming, safer recruitment and a code of conduct that will apply to all its stakeholders.

8.1. Safer Programming

Model Alliance’s mission is to see a fashion industry built on respect and accountability. Model Alliance is campaigning for a set of comprehensive industry standards developed by fashion workers to govern behavior, rights, payment and recourse, as well as a detailed list of consequences and processes that address a breach of the standards. Further information on how Model Alliance plans to achieve this can be found here: [Overview — Model Alliance](#)

All our activities are designed to contribute towards the achievement of our mission and will be delivered with the safety and well-being of everyone as key priority.

Model Alliance’s core activity is to provide a platform for models and creatives working in the fashion industry to contribute to the development of industry standards as well as campaign for change. One way we facilitate this, is through the creation of a Worker Council comprised of models and creatives. Members of the Worker Council are provided with opportunities to speak at events and engagements to raise awareness about the working conditions of fashion workers among lawmakers, journalists, fashion industry leaders, peers, and the general public.

Model Alliance will ensure that all the fashion workers that join the Worker Council are appropriately briefed and supported as they speak at events, both online and face to face. Systems will be put in place for any Worker Council member requiring support in the event of a negative reaction following participation in campaigning and awareness raising activities. Guidance for Worker Council participation can be found here.

Model Alliance also provides a confidential online support service. The service can be accessed through our website: [Support Line — Model Alliance](#). Information is provided about the scope of the service and confidentiality boundaries.

8.2. Safer Recruitment

Safer recruitment is an integral part of Model Alliance’s commitment to build an organizational culture wherein the safety and wellbeing of everyone involved is paramount. The overall purpose of safer recruitment is to help identify and deter or reject individuals who are deemed to pose a risk to the workers we work with and the adults and children who contact us through our online support service.

Model Alliance has appropriate arrangements in place to reduce the risk of unsuitable people entering the organization. We will apply safer recruitment principles in all our recruitment practices. All our staff will be required to undertake a criminal record or other background check following a risk assessment and in accordance with relevant legislation to reduce the risk of unsuitable people entering the organization for the purpose of exploiting and harming children and vulnerable adults. Safeguarding responsibilities will be mentioned in all Model Alliance job descriptions. Model Alliance will also verify the identity of the applicant through a recognised document (passport, driver's license) and request two references before confirming a job offer and include a probation period.

If we become aware that any current staff member or associate may pose a risk to children and/or adults at risk we will comply with the legislation and relevant guidance in respect of referring that representative to the relevant authorities.

8.3. Code of Conduct

Model Alliance's Code of Conduct describes the ethics and behaviors required of all stakeholders to ensure a robust safeguarding environment. It is designed to create a culture of safeguarding best practice and reduce the risks of harm. Model Alliance Board of Directors, Advisory Board, Worker Council, staff, consultants, contractors, interns, volunteers, and other personnel who act on our behalf, will read and sign it, and are expected to adhere to its values and minimum standards.

Breaches of the Code of Conduct are grounds for disciplinary action as well as possible referral of matters to relevant external bodies including statutory authorities, for example where a possible criminal act is involved. Our Code of Conduct can be found [here](#).

8.4. Embedding a strong safeguarding culture through capacity building

A strong safeguarding culture requires an informed and trained staff team and a clear action plan for commitments made. Model Alliance Board of Directors, Advisory Board, Worker Council, staff, consultants, contractors, interns, volunteers, and other personnel who act on our behalf will receive a thorough induction covering all aspects of our safeguarding policies and implementation plan, and they will be introduced to the Safeguarding Lead.

Staff with specific safeguarding responsibilities will be trained to implement safeguarding in their specific context and will respond to issues in a professional and timely manner.

Everyone associated with Model Alliance is obliged to create and maintain an environment that prevents exploitation and abuse. However, directors and managers at all levels have a particular responsibility to support and develop a culture and system that maintains this environment.

Model Alliance's Safeguarding Policy will be reviewed at least annually by our Safeguarding Lead in collaboration with our Board of Directors.



8.5. Protection - Enabling reports

Model Alliance will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the models and creatives we work with. We will also accept complaints from external sources such as members of the public, partners, and official bodies. Our reporting form can be found [here](#). Reporting is supported by our Whistle Blower policy and procedures for internal and external safeguarding concerns.

8.6. Whistleblowing

Model Alliance's Whistleblower Policy, which can be found [here](#), has been developed to support its safeguarding reporting framework.

The policy elaborates a clear process that is widely communicated and accessible to all staff for dealing with concerns. A complaint handling framework managed by a named whistleblowing officer, ensures reports are examined and resolved quickly at the appropriate level. It identifies a clear process to follow if the concern is being raised against an individual in the organization. The policy makes explicit that there can be no reprisals for the whistle-blower where concerns are reported in good faith and without malice.

8.7. Reporting and Accountability Lines

Model Alliance's responsibility for recognizing and reporting safeguarding concerns applies across the organization, with all our stakeholders. Our safeguarding lead is responsible for responding to reports of safeguarding concerns.

9. Reporting Process

9.1. Internal Safeguarding Concerns

Internal safeguarding concerns are reports relating to any concerns about Model Alliance's Board of Directors, Advisory Board, staff, Worker Council members, consultants, contractors, interns, volunteers, and other personnel who act on our behalf.

Reports may be submitted confidentially and/or anonymously. As with all concerns of unlawful or inappropriate workplace behavior, Model Alliance Whistleblower Policy also applies.

The reports can be about a safeguarding incident between two individuals connected with Model Alliance, or an incident between someone associated with us and an external person with whom Model Alliance has contact through our work. External individuals can be anyone our people come into contact with through our work.

Safeguarding concerns can be reported via email to safeguarding@modelalliance.org. The Safeguarding Lead will follow up matters on a confidential basis and are committed to investigate claims thoroughly and fairly using our internal procedure under its human resource management procedures for managing concerns against individuals associated with Model Alliance.

9.2. External concerns

External concerns relate to a disclosure made by individuals using our support service. Model Alliance has procedures in place to support individuals wishing to make a complaint against people they come across in the course of their work. Adults are signposted to appropriate reporting mechanisms. Model Alliance's online support service states that the information provided by the individual seeking will remain completely confidential, unless the person is in serious or immediate danger or we have an obligation to report in accordance with local law. Model Alliance also provides help to people who have difficulty in completing the online request for support form by contacting support@modelalliance.org

Where Model Alliance provides advice and guidance confidentiality will be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management is only shared on a need-to-know basis, and is kept secure at all times.

All safeguarding reports should be made through our incident reporting form. For both internal and external safeguarding, the safeguarding lead at the board level will be informed immediately. They will make sure that incidents are dealt with appropriately and that all steps below are followed.

10. Responding to Safeguarding Concerns

Model Alliance will follow up on safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations of the State of New York.

Model Alliance is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of any type of harm, violence and harassment. Safeguarding is everyone's responsibility. Model Alliance places a mandatory obligation on the Board of Directors, Advisory Board, staff, Worker's Council, consultants, contractors, interns, volunteers, and other personnel who act on our behalf to immediately report concerns, suspicions, allegations and incidents that indicate actual or potential abuse and harassment of children, vulnerable adults and beneficiaries when perpetrated by staff and contractors.

Model Alliance also urges all staff to report violence and harassment against colleagues. We commit to take appropriate action in response to any such reports and we do not tolerate abuse, harassment and any form of misconduct. Model Alliance will apply appropriate disciplinary measures to staff found in breach of its safeguarding policy.

The safety and wellbeing of the individual(s) affected is the paramount consideration and immediate steps must be taken by the Safeguarding Lead in collaboration with Board Member(s) as necessary to protect the individual(s) affected and to address any possible urgent medical needs.

Where it appears that a criminal offense may have taken place, the matter will be referred to the appropriate authorities in line with local reporting/referral systems. A virtual or in person case discussion involving relevant members of Model Alliance’s Leadership will be held within 24 hours to discuss the nature of the case and to make decisions on next steps. Any investigation involving the Board of Directors, Advisory Board, staff, Worker Council, consultants, contractors, interns, volunteers, and other personnel will be handled fairly with the full support of the Model Alliance’s board. Investigations will be objective, transparent, and will be guided by professional expertise and support when required.

Safeguarding concerns identified through the support service relating to adults will be provided with advice, guidance and support and signposted to appropriate institutions and professionals for support and advice for further action. Safeguarding concerns relating to children will be reported to statutory authorities.

11. Serious Incident Reporting

Model Alliance recognizes its responsibility to report a serious incident to donors and statutory authorities in which a vulnerable person (child/adult) is harmed or placed at risk of harm because of their contact with people associated with our work.

Model Alliance defines a serious safeguarding incident as an allegation of harm (a crime under local law, such as incidents of sexual abuse, exploitation, domestic violence or child abuse) or conviction against anyone associated with our work resulting in actual or threatened harm to Model Alliance beneficiaries, staff, volunteers or others who come into contact with us through our work.

Model Alliance will make a report to donors observing data protection and privacy requirements using the donor’s reporting form and state the steps taken to safeguard the victim and to prevent further escalation and recurrence of such incidents at Model Alliance.

Allegations of harm reported through our online support service will be reported to appropriate protection mechanisms following our procedures.

12. Data Protection

Model Alliance recognizes its obligations to process data in line with existing relevant data protection legislation⁶ including a duty to protect personal data against any unauthorized or unlawful processing and any accidental loss or destruction of, or damage to, the personal data.

For any internal allegations Model Alliance will always adopt a survivor centered approach and support alleged adult victims and take their wishes and feelings into account. For safeguarding concerns relating to adults that are identified through the support service, advice and information about statutory reporting mechanisms will be provided. However, in cases where information suggests an immediate risk of harm, data protection legislation is not a barrier to

⁶ [The New York Privacy Act 2021: What You Need To Know | Centraleyes](#)

sharing safeguarding concerns. Those representing Model Alliance cannot keep confidences when they involve concerns about a vulnerable adult or a child who is at risk or likely risk of harm. It is important that everyone providing services on behalf of Model Alliance is prepared to explain that confidentiality will need to be breached where shared information suggests immediate harm to an adult and children.

13. Recording

All safeguarding concerns or allegations must be recorded as soon as possible, and the record will form the basis for sharing information with the safeguarding lead and onward referral where relevant.

Safeguarding records will be kept in line with New York Privacy Act 2021 requirements and information will be shared observing these. All safeguarding incident reports will be clearly recorded with concerns raised and actions taken and securely stored with password protected access to authorized personnel only.

14. Risk Management

Model Alliance will manage risk responsibly. Risk is defined as uncertainty, whether positive or negative, that will affect the outcome of an activity, or the well-being of individuals or the reputation of an organization. Model Alliance will include safeguarding risk and mitigation strategies in its risk management log. Model Alliance's management is committed to review and assess regularly the risks faced by the organization in all areas of our work and to plan for the management of those risks.

15. Media and Communications

The Model Alliance worker community is accustomed to being photographed and sometimes these images are taken without informed consent. Through its use of photographs, video and written case study material, Model Alliance commits to representing information about its work in ways that respects the dignity of the people portrayed. Model Alliance respects the wishes of the individual when requesting permission for photographs/video/and written information. Informed consent is obtained by anyone whose photograph/video/case information will be used for the purpose of communicating Model Alliance's work. Model Alliance is fully aware of the misuse and manipulation of images in the modeling world. When using photographs, video film or case study material Model Alliance will ensure that any material used is not manipulated or taken out of context.

We will not publish photographs of anyone who is concerned about the use or impact of the image. Model Alliance does not post images of child models without written consent by the parent or guardian for children under the age of 18, as well as the child themselves where possible.

Likewise, for an adult who lacks the capacity to provide informed consent, a family member/caregiver must give consent on their behalf. It is good practice to ensure that the



subject of the photograph/video/case study understands how, when and where the information is going to be used and where it will be stored and for how long. Absolutely no payments or any other form of compensation are to be provided to any person being photographed/videoed in exchange for their video film or photograph or to encourage consent.

Model Alliance understands that in today's digital landscape, photographs can be shared widely beyond their original intent of use. Consequently, we will work hard to ensure that individuals who have their photographs taken in relation to our work are used for the purpose for which consent is given. We will ensure that people who give us consent have clear pathways for contacting us through our communication and media teams and that they are aware that options to withdraw consent remain open, without a time limit.

Model Alliance will ensure that any photograph or recorded case study history of a child or vulnerable adult does not place them in a position of harm or render them vulnerable to any form of exploitation or abuse. Model Alliance will disguise their identity and will not provide any information that could lead to a child or vulnerable adult being identified or tracked.

All social media and case studies used through digital channels generated by Model Alliance will be subject to the same safeguarding guidelines as outlined in this policy. Model Alliance's must be followed at all times. Access to photographs is limited to those that need them during the course of their work. All people involved with using Model Alliance's social media channels are allowed to only use photographs, videos and other visual materials that are shared with them internally for promotional purposes, or are made accessible through third parties with the same purpose. All textual and visual materials will include a citation of the sources. Model Alliance will only include those visual materials that it is allowed to use, whether through copyright statements, fair use policies, explicit consent or other ways of permission granted.

16. E- Safety

The safe and responsible use of technology is an important consideration at Model Alliance. Our E-safety arrangements apply to the use of all forms of digital communication (internet, email, chat, video communications, etc.). Model Alliance has measures in place to ensure that confidential material transmitted electronically is encrypted with enterprise grade technologies, protecting our data at rest and in-transit.

The website of Model Alliance uses cookies, small files stored on the device of the user. These cookies allow us to manage access to, and use our website, recognize the user and helps us to understand how our website is used. Users may disable cookies at any time through the browser.

17. Implementation and Review

Model Alliance's safeguarding policy will be available to all Board of Directors, Advisory Board, Worker Council, staff, consultants, contractors, interns, volunteers, and other personnel.



Model Alliance Board of Directors, Advisory Board, Worker Council, staff, consultants, and interns will sign the code of conduct as part of the induction process; the safeguarding lead will ensure this arrangement is in place.

Staff with specific safeguarding responsibilities will be trained/signposted to receive and respond professionally to safeguarding concerns and allegations.

Model Alliance will continually evaluate its safeguarding practice and update its policy following an annual review by the Safeguarding Lead.

Model Alliance
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