

Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding concerns Overarching Policy

Policy for all staff and representatives

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ActionAid's SHEA and Safeguarding approach

ActionAid is committed to working with others to end injustice and eradicate poverty, and to build a world which upholds the rights and dignity of all. We recognise that to work with integrity we must 'walk the talk' and ensure that anyone who comes into contact with ActionAid is protected from any form of injustice, discrimination, or abuse. Safeguarding refers to the policies and processes that an organisation puts in place to prevent and respond to harm carried out by staff or those working on our behalf. ActionAid's SHEA and Safeguarding policies sit under the AAI Code of Conduct and are informed by and reinforce ActionAid's feminist leadership approach. **ActionAid is committed to preventing any form of sexual harassment, exploitation and abuse (including child abuse and adult at-risk abuse) and responding robustly when these harms take place.**

SHEA and Safeguarding incidents are rooted in an imbalance of power, particularly gendered and sexualised abuses of power. ActionAid views any form of sexual violence as a gross violation of human rights. We will not tolerate our staff or other representatives¹ carrying out any form of sexual harassment, exploitation or abuse towards anyone we come into contact with through our work.

We recognise that gendered forms of sexual violence disproportionately affect women and girls, and our work recognises the impact on boys, men, transgender communities and gender non-binary people. ActionAid is committed to working with complainants and survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout. We are committed to working with marginalised and oppressed groups, recognising the impact of sexual violence on people living in poverty and people of different ethnicities, religions, race, class and abilities. We will listen to and learn from them and work to ensure that our SHEA and Safeguarding approach supports the work they do to promote their rights and live lives with dignity.

¹ Other representatives working with ActionAid include (but are not limited to) partners, volunteers (including board and assembly members), consultants, contractors/suppliers/vendors, interns, visitors (e.g. donors), dependents accompanying staff while working for ActionAid, and other individuals acting as representatives of ActionAid.

We have to acknowledge that some staff and other representatives will use their position of power for personal gain, exploiting the trust placed in them to harm others. We must do everything we can to reduce the likelihood of this happening and respond swiftly and robustly when incidents take place. SHEA and Safeguarding is about fundamentally re-thinking our sector's approach to humanitarian and development work. It asks us to question the work cultures we create and perpetuate and to challenge the norms and power structures inherent in aid work. In doing so, we can create radical new approaches which help to ensure that our behaviours, work cultures, and processes do not deliberately or inadvertently cause harm.

ActionAid is committed to:

- Creating a **safe working culture** that upholds the rights and dignity of all, founded on AAI's values and mission, outlined in our Code of Conduct, and our Feminist Leadership approach.
- In line with ActionAid's **intersectional feminist approach**, ensuring that our SHEA and Safeguarding work continuously learns from the voice and experience of marginalised and oppressed groups and challenges destructive systems of power.
- Ensuring that our approach is **survivor-centred**. That is, that we are committed to upholding the power and dignity of survivors by respecting their confidentiality and their right to make decisions over what happens to them, where it is safe and appropriate for them to do so.
- Demonstrating our **zero-tolerance approach** to sexual harassment, exploitation and abuse and other Safeguarding concerns by:
 - ensuring that **all allegations of sexual harassment, exploitation and abuse and other Safeguarding concerns are responded to** in a timely, robust, and survivor-centred manner.
 - ensuring that we **embed our SHEA and Safeguarding approach** into every aspect of our work – how we recruit, to how we build capacity, to how our programmes are designed – so that we uphold the rights of all to live and work with integrity, free from violence and harm.

Purpose and Scope

The purpose of this policy is to outline ActionAid International's approach to Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding concerns (including child abuse and adults at-risk abuse). All staff and other representatives must familiarise themselves with this overarching policy, alongside ActionAid's Code of Conduct. ActionAid recognises the ways in which different forms of sexual violence and abuse of power intersect and inform each other however, in order to identify and address the different ways in which these abuses of power manifest we have developed three distinct policies that all staff and other representatives are expected to abide by:

- **Child Safeguarding Policy**
- **Protection from Sexual Exploitation and Abuse (PSEA) Policy**
- **Sexual Harassment, Exploitation, and Abuse (SHEA) at Work Policy**

For concerns regarding children please refer to the *Child Safeguarding policy*. For concerns regarding sexually harassing, abusive, or exploitative behaviour towards staff and other ActionAid representatives please refer to the *Sexual Harassment, Exploitation, and Abuse at*

Work policy. For concerns regarding Rights Holders and community members, including adults at-risk, please refer to the *Protection from Sexual Exploitation and Abuse policy*. For concerns regarding Bullying and Harassment, please refer to the *AAI Bullying and Harassment policy*. For any concerns regarding allegations of illegal and improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, or miscarriages of justice, please refer to the *AAI Whistleblowing Policy*.

This policy is binding for all offices and working locations of ActionAid and for **all ActionAid staff members**, whether full time, part time or engaged on fixed term contracts. In line with ActionAid's Code of Conduct, this policy is binding both in and outside of working hours and in all aspects of a staff member's life. **It is also binding for other representatives working with ActionAid, including (but not limited to) partners, volunteers (including board and assembly members), consultants, contractors/suppliers/vendors, interns, visitors (e.g. donors), dependents accompanying staff while working for ActionAid, and other individuals acting as representatives of ActionAid. All staff and representatives named above can raise a complaint via the procedures outlined in this policy.**

ActionAid Directors/International Leadership Team and International Board hold overall accountability for this policy and its implementation. They are responsible for ensuring the policy is reviewed and updated **every two years**. Adherence to this policy will be reviewed through ActionAid's internal auditing mechanisms. Updates to the policy will be recommended through the Global SHEA and Safeguarding Lead to the International Leadership Team (ILT) who will seek approval from the International Board. In the case of substantive changes to this policy, the International Board will seek approval from the General Assembly.

Child Safeguarding Policy

The purpose of this policy is to ensure that procedures are in place to **protect all children** from deliberate or unintended actions that place them at risk of abuse or exploitation carried out by any member of the ActionAid Federation or other representative.

Key policy positions:

- Action Aid **strictly prohibits staff and other representatives from engaging in any kind of sexual activity with children** (defined as anyone under the age of 18, or older if the local law indicates this). Mistaken belief of age is no defence.
- ActionAid **strictly prohibits staff and other representatives from engaging in or promoting any form of abusive, exploitative or harmful behaviour** towards children.
- All staff and other representatives have a **duty to protect the rights of children** and ensure that our SHEA and Safeguarding approach is embedded into all areas of our work. Every aspect of our work must be carried out in a way that ensures the rights, dignity and empowerment of children. We will engage with children in a way that recognises their agency, individuality, and value and work with them to ensure that they are not simply safe *from* harm but safe *to* realise their rights and become active agents of change.

Protection from Sexual Exploitation and Abuse (PSEA) Policy

The purpose of this policy is to ensure that procedures are in place **to protect the rights holders and communities we work with, including adults at-risk** from sexual abuse or exploitation carried out by any member of the ActionAid Federation or other representative.

Key policy positions:

- ActionAid **strictly prohibits staff and other representatives from engaging in any form of sexual activity with rights holders or adults at-risk**, or any form of abusive, exploitative or harmful behaviour.
- Relationships or any kind of sexual activity with community members who are not rights holders (i.e. not receiving direct assistance from ActionAid or involved directly in any programming activities) are not prohibited however, staff and other representatives must ensure the relationship is not and could not be perceived to be exploitative or abusive. This must be raised to the Country Director to manage the potential risks.
- ActionAid **strictly prohibits staff and other representatives from buying sex**. ActionAid does not make judgements on people who sell sex. However, in recognition of the potential for sexual exploitation and abuse and in line with the IASC Core Principles on PSEA, ActionAid has banned this activity.
- All staff and other representatives have a **duty to protect the rights holders and communities we work with, including adults at-risk** and ensure that ActionAid's SHEA and Safeguarding approach is embedded into all areas of ActionAid's work. Every aspect of our work must be carried out in a way that ensures the rights and dignity of rights holders, community members, and adults at-risk. We are committed to working with them to ensure that they are not simply safe *from* harm but safe *to* realise their rights and be active agents of change.

Sexual Harassment, Exploitation, and Abuse (SHEA) at Work Policy

The purpose of this policy is to ensure that ActionAid **provides a safe working environment** and that procedures are in place to **protect staff and other representatives from any form of sexual harassment, exploitation, and abuse** carried out by any member of the ActionAid Federation or other representative.

Key policy positions:

- Staff and other representatives have a **duty to create a safe working environment** that respects the dignity and rights of all. Staff and other representatives are strictly prohibited from carrying out any form of sexual harassment, exploitation or abuse towards anyone they come into contact with through their work. ActionAid is committed to ensuring that all ActionAid staff and representatives can operate in an environment in which they are not simply safe *from* harm but safe *to* realise their rights and work with dignity.
- ActionAid **prohibits staff and other ActionAid representatives from engaging in sexual activity with people whom they line manage or supervise** and, in the case of the most senior managers, any more junior staff.
- ActionAid does not prohibit staff from beginning relationships with each other outside of the unequal power dynamics outlined above but all staff and representatives engaged in or beginning relationships with other staff or representatives must behave professionally and conduct their relationships in a way that does not impact on ActionAid's work.

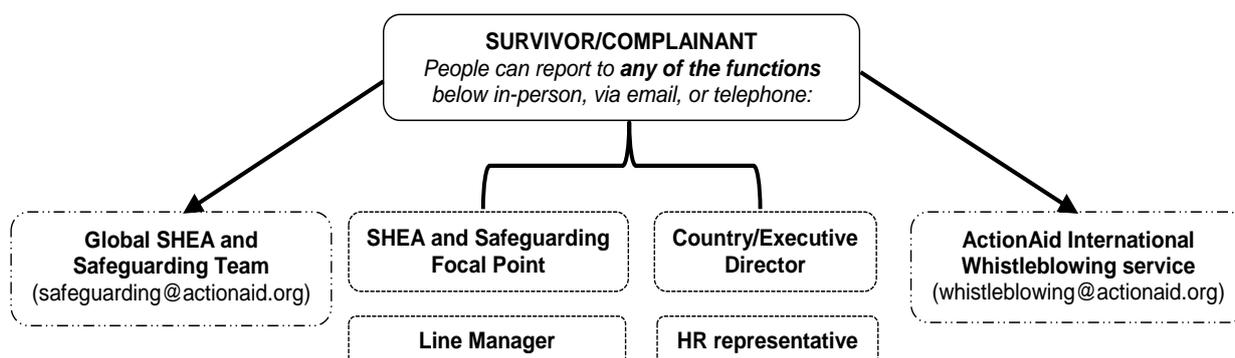
How to report a SHEA and Safeguarding concern

ActionAid staff members and other representatives can report SHEA and Safeguarding concerns in their ActionAid country to any of the following channels in person, via email, or telephone:

- SHEA and Safeguarding Focal Point
- Country Director
- Line Manager
- HR Representative

If ActionAid staff or representatives have concerns about first reporting in country or if they want to raise concerns (i.e. appeal against) how a process has been managed in country, they can report directly to:

- AAI Global SHEA and Safeguarding Team (safeguarding@actionaid.org)
- AAI Whistleblowing Service (whistleblowing@actionaid.org)



All staff and other representatives are required to report if:

- A rights holder or community member alleges that they or another person is experiencing or at risk of experiencing sexual exploitation or abuse - whether carried out by ActionAid staff and representatives, or others.
- A staff member or other representative suspects that someone connected to ActionAid is or may be about to carry out sexual exploitation and abuse towards rights holders, community members or others.
- A staff member or other representative suspects that someone external to ActionAid (e.g. a Teacher or Community Leader) is or may be about to carry out sexual exploitation or abuse towards rights holders, community members, or others.

If a staff member or other ActionAid representative **does not** report an incident or suspicion they will be in breach of the Code of Conduct and may face disciplinary proceedings.

SHEA and Safeguarding Focal Points are responsible for reporting all concerns and complaints to the Global SHEA and Safeguarding Team to ensure that the Global Team has oversight of all SHEA and Safeguarding concerns in the Federation. The SHEA and Safeguarding Focal Point must complete a SHEA and Safeguarding Incident Reporting Form and send this to safeguarding@actionaid.org within 24 hours (where possible) of a concern being raised. The Global SHEA and Safeguarding Team will support the ActionAid country to respond to all concerns and complaints raised, and monitor action taken.

The Country Director, through designated positions/teams, will work with the Global SHEA and Safeguarding Team to ensure that donors and others (e.g. other ActionAid countries so that they can fulfil their own donor reporting requirements; statutory/regulatory bodies) are informed of SHEA and Safeguarding concerns, in line with agreed requirements.

Reporting and ActionAid’s Survivor-Centred approach

In line with the AAI Code of Conduct, if anyone has concerns that any individual has been or is at risk of being abused, exploited, or harmed in any way they must report this immediately in line with the reporting procedures outlined below. **However, in line with ActionAid’s survivor-centred approach, individuals do not have to report their own experience of sexual harassment, exploitation, or abuse.**

As part of our survivor-centred approach, survivors/complainants can choose if, when, and how to make a report and decide whether they want ActionAid to take formal action. There may be occasions where ActionAid has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case by case basis, following clear risk assessments, and the safety and wellbeing of the survivor/complainant will be paramount throughout.

There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed but ActionAid will take every reasonable measure to address the concern. ActionAid will ensure that the safety, dignity and rights of the survivor are respected at all times. We are committed to carrying out robust and fair investigations that protect the rights of all involved, with a particular focus on the survivor/complainant and the subject of the complaint, ensuring that confidentiality is maintained and that the wellbeing of all is protected.

Management of complex SHEA and Safeguarding reports:

Nature of Concern	Response
Allegation about staff at a Partner Organisation	Concerns about staff at a Partner Organisation must be reported to the SHEA and Safeguarding Focal Point. They will report to the designated person in the partner and work with the partner to ensure the matter is addressed swiftly and appropriately. This may be through the partner’s internal process or through a joint process agreed by ActionAid and the partner. If ActionAid has concerns that a complaint has been dealt with inappropriately or inadequately by a partner, ActionAid should raise concerns to the appropriate channels in the partner organisation and if these concerns are not addressed they must consider whether they will withdraw funding or end the relationship.
Allegation about staff at another international aid agency	Concerns raised about the behaviour of staff of another international aid agency must be reported to the SHEA and Safeguarding Focal Point. They will report to the designated person in the other organisation to ensure the matter is addressed. This may be through the other organisation’s internal process or through a joint process agreed by ActionAid and the organisation. If ActionAid has concerns about the other organisation’s response they should raise concerns to the appropriate channels in the organisation and consider termination of engagement if no action is taken.
Allegation relating to criminal activity and/or relating to a child where others have a remit to investigate	Allegations that staff or other representatives have carried out a criminal activity will be assessed by the SHEA and Safeguarding Focal Point and the Global SHEA and Safeguarding Team. They will assess on a case by case basis if there are any risks involved in sharing to the police or other external bodies (e.g. if there are concerns that informing the police or others would put the survivor/complainant at risk).

	<p>ActionAid is not a child protection agency and does not have the expertise required to carry out investigations of child abuse itself. This will be carried out by external experts brought in specifically for this purpose.</p> <p>For allegations in which external bodies (e.g. police) rather than ActionAid have a remit to investigate ActionAid will support the external process. ActionAid will monitor the external response to ensure that as far as possible it is carried out in line with ActionAid's values, and using ActionAid's advocacy role to promote change where needed.</p>
ActionAid staff member or other representative raises concerns about how a complaint was managed in an ActionAid country and wants to appeal the decision	ActionAid staff members and representatives who disagree with actions taken must first appeal in country. If they are dissatisfied with the response they receive to their appeal, they can make a second and final appeal to the Global SHEA and Safeguarding Team, who will work with the AAI Board to review the case. They can repeal the decision made by the ActionAid country if they find in favour of the staff member or other representative making the appeal.
Allegation raised by staff member or representative from one ActionAid country against a staff member or representative from another ActionAid country	Concerns raised that involve staff from more than one ActionAid entity must be raised to the Global SHEA and Safeguarding Team to take action. Recognising the shared reputational risk, when possible (e.g when a complainant wants to raise a complaint and/or there is sufficient information to take forward an investigation) a joint incident management process will be established, involving staff from both countries as appropriate, and led by the Global SHEA and Safeguarding Team and AAI Board. The risk will be monitored at the AAI Board level.
Allegation raised against a Country/Executive Director	Concerns raised about a Country/Executive Director must be raised to their National Board, the AAI Board, and the Global SHEA and Safeguarding Team. Recognising the shared reputational risk, when possible a joint incident management process will be established between the National Board and AAI, and led by the Global SHEA and Safeguarding Team and AAI Board. The risk will be monitored at the AAI Board level.
Allegation raised against anyone in the International Leadership Team (ILT) or the Secretary General	Concerns raised about anyone in the International Leadership Team (ILT) or the Secretary General must be raised to the AAI Board and the Global SHEA and Safeguarding Team who will ensure, when possible, that an incident management process takes place. The risk will be monitored at the AAI Board level.
Allegation raised against an ActionAid Board Member	Concerns raised about a Board Member must be raised to the Global SHEA and Safeguarding Team. If the allegation relates to a National Board Member then the AAI Board and the Global SHEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the National Board as appropriate. The risk will be monitored at the AAI Board level. If the allegation relates to an International Board Member then the Global SHEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the International Board and the Secretary General as appropriate. In both cases if a complaint is upheld, an assessment will be made on whether it is appropriate for the Board member to continue to serve on the Board.
Allegation about a SHEA and Safeguarding Focal Point	Concerns raised about SHEA and Safeguarding Focal Points must be reported to the Country/Executive Director and to the Global SHEA and Safeguarding Team who will take a joint decision on how to respond to the allegation and what incident

	management response is appropriate. The risk will be monitored at the AAI Board level.
Allegation about anyone in the Global SHEA and Safeguarding Team	Concerns raised about anyone in the Global SHEA and Safeguarding Team must be reported to the Secretary General and the SHEA and Safeguarding Lead on the AAI Board. They will ensure that appropriate action is taken. The risk will be monitored at the AAI Board level.

Responding to Concerns and Complaints

Incident Management Process

Anyone can raise a concern or complaint. An individual can raise a complaint even if they have no evidence other than their own experience, recognizing that sexual harassment, exploitation and abuse usually occur away from the public eye and therefore it can be difficult to produce evidence (e.g a witness).

ActionAid will work with survivors and complainants to understand how they would like the issue they raised to be addressed; this policy does not prejudice the right of survivors and complainants to use external procedures (e.g criminal justice procedures) where that is their preference to do so. Support options will be offered to survivors and complainants regardless of whether or not they decide to make a formal complaint.

If a survivor or complainant makes a formal complaint and wants an investigation to be carried out, or if ActionAid takes the view that they have a duty of care to carry out an investigation, then an investigation process will be initiated, and must follow the Global SHEA and Safeguarding Team's Investigation Guidelines. The GS and all ActionAid countries must have measures in place to ensure that any investigations carried out are objective, timely, fair and built on ActionAid's SHEA and Safeguarding approach. All parties should be able to participate in the investigation without fear of retaliation.

Step 1: Complaint received (timeframe: actions taken within 48 hours)

- a) Within 24 hours the complaint is acknowledged and the SHEA and Safeguarding Focal Point (or other staff member as appropriate) will engage with complainant/survivor to ensure they are safe and their concerns are understood. The Global SHEA and Safeguarding Team is informed so they can support as appropriate.
- b) The SHEA and Safeguarding Stakeholder panel will triage all cases to assess what action can be taken. If an investigation cannot be carried out (e.g. if survivor does not want an investigation or there is insufficient information to proceed) then the Panel will close the case and assess what other actions can be taken to address concerns e.g. awareness raising.
- c) Within 48 hours the SHEA and Safeguarding Stakeholder Panel meet.
- d) Risk assessment carried out to address any immediate security or welfare concerns, and legal guidance sought.
- e) Investigation Team and separate Decision Making Panel appointed. This must be done in line with national laws.

Step 2: Investigation (timeframe: approx. 4 weeks but this may differ depending on nature and complexity of case)

- f) Following the investigation guidelines set out by the Global SHEA and Safeguarding team, an investigation can include carrying out any interviews, gathering any available evidence, and producing an investigation report.
- g) The complainant/survivor should be interviewed first (or provide a written response to questions submitted by the Investigation Team where a verbal interview is not possible), followed by any witnesses and the complainant if not the survivor, and then the subject of complaint. It is important to note that sexual exploitation and abuse in all its forms usually occurs away from the public eye and it therefore may be difficult to produce evidence. An individual can raise a complaint even if they can point to no objective evidence other than their own experience.
- h) The Investigation Report is submitted to the Decision Making Panel.

Step 3: Decision (timeframe: actions taken within 72 hours)

- i) Decision making panel review report and take a decision on the report and its findings.
- j) The Decision Making Panel or others as appropriate to carry out any recommendations agreed on (e.g. disciplinary hearing, termination, awareness raising, policy development) with support from HR as required.

Step 4: Outcomes shared and lessons learnt (timeframe: up to 1 week following decision made)

- k) Decision Making Panel document the decision and inform the complainant and subject of complaint.
- l) The Global SHEA and Safeguarding Team is informed of the outcome.
- m) The subject of complaint and the complainant have the right to appeal against the decision, in line with ActionAid's HR policies and procedures. The complainant and subject of complaint can appeal in country. If they have concerns about the country's response (e.g. if a conflict of interest has impacted on the investigation) they can raise this to the Global SHEA and Safeguarding Team who can carry out an independent review.
- n) A case conference convened so that the SHEA and Safeguarding Stakeholder Panel, Investigation Team, and Decision Making Panel can discuss learning from the case. Feedback must be sought from the survivor/complainant and incorporated into the lessons learnt conversation. Lessons learnt to be shared as appropriate, removing identifiable information, with governance boards and other relevant bodies to ensure key learning is shared and improvements made to practice

ActionAid will make a decision on a case by case basis about how allegations of abuse or exploitation towards children and adults at-risk will be addressed. Allegations relating to child exploitation or abuse will be addressed by internal or external experts. ActionAid will refer cases to appropriate professionals and organisations that act in line with ActionAid's values and puts the welfare of the child or adult at-risk as the highest priority.

Retaliation Against Complainants, Victims and Witnesses

ActionAid will take action against any staff or other representatives who seek to or carry out retaliatory action (e.g. intimidation, threatening behaviour) against complainants, survivors, witnesses or any others involved or believed to be involved in an incident management process. Staff who are found to have done this will be subject to disciplinary action, up to and including termination of employment.

False or malicious complaints

False or malicious allegations of sexual harassment, exploitation and abuse are extremely rare. However, if an ActionAid staff member is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It is important to note that if a case is not upheld that does not mean the complaint was false, rather that there was insufficient evidence to uphold the allegation.

Confidentiality

Confidentiality is critical to carrying out SHEA and Safeguarding work. We are committed to working with survivors/complainants and others involved in an incident management process in a confidential and respectful manner. Information must be shared on a 'Need to Know' basis – that is, only those who need to be informed so they can support an investigation or because they hold overall accountability will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to a child or suggests that someone's life is in danger, then action will need to be taken outside of standard confidentiality procedures in order to ensure that everyone is safe. This will be managed on a case by case basis, and the safety and wellbeing of the child or at-risk adult in question is always paramount.

ActionAid will ensure that it complies with local and international data protection laws when gathering, storing, or sharing any data relating to individuals involved in SHEA and Safeguarding incidents, and will follow the guidance on retaining data on incident management that is issued by the Global SHEA and Safeguarding Team.

Support Options

Support will be offered to survivors/complainants regardless of whether a formal response is carried out (e.g. an investigation). Support will also be offered as appropriate to others involved in an incident management process, recognising the impact this can have, for example on witnesses and those accused of carrying out inappropriate or harmful behaviours. This can include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed.

Survivors and complainants can choose if and when they would like to take up the support options available to them. ActionAid is committed to listening to and learning from survivors about what support they want, and being guided by them where safe and appropriate to do so. ActionAid is committed to working with local NGOs and women's rights groups to develop learning on safe, intersectional, and feminist support options and ensuring that the support options offered meet the needs of diverse survivors.

ActionAid will ensure support for children and adults at-risk is provided by appropriate professionals and organisations. ActionAid will ensure that cases are referred to them, and that due diligence is taken to ensure that they act in line with ActionAid's values and puts the welfare of the child or adult at-risk as the highest priority.

If you have any questions about support options, please contact your SHEA and Safeguarding Focal Point and/or the Global SHEA and Safeguarding Team (safeguarding@actionaid.org).

Appendix: Definitions

<p>Abuse</p>	<ul style="list-style-type: none"> - <u>Domestic</u> – “Including psychological, physical, sexual, financial, emotional, or so-called ‘honour’ based violence.” - <u>Financial/material</u> – “Including theft, fraud, and coercion in relation to financial affairs such as, property or financial transactions” - <u>Neglect</u> – “Including ignoring emotional or physical care needs, failure to provide access to appropriate healthcare or educational services, the withholding of life necessities such as food.” - <u>Physical</u> – “Including assault, hitting, slapping, pushing, restraint, or inappropriate physical punishments.” - <u>Psychological</u> – “Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or unreasonable and unjustified withdrawal of supportive networks” - <u>Sexual</u> – “actual or threatened physical intrusion of a sexual nature, whether by force or under unequal conditions e.g. sexual assault, rape. ActionAid strictly prohibits staff and other representatives from engaging in any kind of sexual activity with children (anyone under the age of 18 years, or older if the local law indicates this). Mistaken belief of age is no defence.
<p>Adult</p>	<p>An individual aged 18 or over</p>
<p>Adult at-risk</p>	<p>Someone over the age of 18 who, for physical, social, economic, environmental or other factors can be more vulnerable to abuse, exploitation or other harms. Given this definition, many people we work with around the world would come under this definition. Recognising this we will work to ensure that this is an empowering rather than a dis-empowering term, and that we use it to work with communities to uphold the rights and dignity of those who may be at greater risk of abuse or exploitation.</p>
<p>Child</p>	<p>Any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood. This definition is in line with the <i>UN Convention on the Rights of the Child</i>. Whilst a person under the age of 18 may have reached the age of majority, age of sexual consent, or voting age, this does not alter their inherent vulnerability as a child.</p>
<p>Child abuse</p>	<p>All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. The main categories of abuse are defined as physical abuse; sexual abuse; psychological abuse; and neglect.</p> <ul style="list-style-type: none"> ○ <u>Physical</u> abuse can include inappropriate physical punishments towards a child, and/or assaulting, pushing, hitting, and slapping them. ○ <u>Sexual</u> abuse is defined as any sexual activity, or actual or threatened physical intrusion of a sexual nature, with someone under the age of consent or under 18, whichever is greater, is considered sexual abuse. ○ <u>Psychological</u> abuse can include, especially in relation to children, threats of harm or abandonment, deprivation of contact, humiliation, blaming, intimidation, coercion, harassment, verbal abuse, and isolation.

	<ul style="list-style-type: none"> ○ <u>Neglect</u> can involve preventing access to education, food or other life necessities, and any emotional or physical care needs. Whatever form it takes, neglect can be just as damaging to a child as physical abuse. Children are more susceptible to neglect given their inherent vulnerability and dependence on adults for support. <p>It is common for a child that is abused to experience more than one type of abuse, and it often happens over a period of time rather than being a one-off event.</p>
Safeguarding	The responsibility that organisations have to make sure their staff, operations, and programmes do no harm to anyone they come into contact with, and that they do not expose anyone to the risk of harm and abuse
Sexual abuse	<p>ActionAid uses the definition outlined in the <i>UN Secretary General Bulletin's on Protection from Sexual Exploitation and Abuse</i>: "actual or threatened physical intrusion of a sexual nature, whether by force or under unequal conditions e.g. sexual assault, rape.</p> <p>ActionAid strictly prohibits staff and other representatives from engaging in any kind of sexual activity with children (anyone under the age of 18 years, or older if the local law indicates this). Mistaken belief of age is no defence.</p>
Sexual exploitation	<p>ActionAid uses the definition outlined in the <i>UN Secretary General Bulletin's on Protection from Sexual Exploitation and Abuse</i>: "any actual or attempted abuse of power or trust for sexual purposes, including, but not limited to, profiting commercially, monetarily, socially, or politically from the sexual exploitation of another"²</p> <p>This can represent a wide spectrum of examples including but not limited to invasion of someone's sexual privacy, forced transactional sex, non-consensual filming of a sexual act or exposure of genitals, online grooming, or knowingly spreading a sexually transmitted disease or infection and acts of intimidation of a sexual nature that are intended to cause discomfort and embarrassment.</p>
Sexual harassment	<ul style="list-style-type: none"> - Sexual harassment is unwanted conduct of a sexual nature. It can happen to anyone regardless of gender, sexuality, race or any other factor. ActionAid recognises that different forms of discrimination overlap and intersect and that this exacerbates the risk of sexual harassment within marginalised and threatened groups such as women, people of colour, people with disabilities and people in the LGBTQI community. - Sexual harassment can be directed towards one person, groups of people, or towards everyone, and can occur as a one-off incident or as a pattern of behaviour. - Sexual harassment can be carried out with the effect of creating an intimidating, degrading, or offensive environment and/or to violate the dignity of another person. - An action or behaviour can still be considered sexual harassment even if the alleged harasser didn't intend for it to be harmful. When addressing allegations of sexual harassment, ActionAid is concerned with the impact of the behaviours on the complainant, not the intention of the person accused. - Sexual harassment can be physical, verbal, or non-verbal. Examples of this include, but are not limited to: <ul style="list-style-type: none"> ○ Physical examples include touching, unwanted physical contact and assault (including attempts and threats)

² <http://pseataforce.org/en/overview>

	<ul style="list-style-type: none"> ○ Verbal examples include derogatory comments, jokes, questions about someone's sex life, remarks about someone's appearance ○ Non-verbal examples include sexual gestures, staring, and unwanted phone calls, letters, notes, and/or emails
<u>OTHER RELEVANT TERMS</u>	
Child marriage	<p>A formal marriage or informal union involving someone aged under 18.</p> <ul style="list-style-type: none"> ○ The practice of marrying off young children is a form of sexual violence since the children, and particularly girls, involved are unable to give or withhold their consent. ○ Even though this occurs in many parts of the world where it is also entirely legal, it is something ActionAid campaigns against given our human rights-based approach.
Child safeguarding	<p>Child safeguarding is the action that is taken to promote the welfare of all children and protect them from harm.</p> <p>Child protection is part of wider safeguarding activities and refers to activities that are undertaken to protect specific children who are suffering or likely to suffer significant harm.</p>
Child sexual exploitation	<p>This can take the form of commercial and/or online sexual exploitation of children:</p> <ul style="list-style-type: none"> ○ Commercial sexual exploitation is sexual abuse enabled by a payment in cash or in-kind to the child or another person (or group of people). The commercial sexual exploitation of children is a form of coercion and is a form of modern slavery. ○ Online sexual exploitation covers any act of sexual exploitation towards a child that has at any point been carried out online <ul style="list-style-type: none"> ▪ It includes any use of technology (e.g. phones, computers, cameras, online platforms, social media) that causes a child to be sexually exploited and any material created using this technology to be produced, bought, sold, possessed, distributed or transmitted
Complainant	<p>This is the person making a complaint; it may be the person who experienced what is being reported (the survivor), or it may be another person (a third-party complainant) who becomes aware of an issue and makes the complaint.</p>
Complaint	<p>The specific grievance of anyone who has been negatively affected by an individual's action towards them, or who believes that an organisation has failed to meet a stated commitment that is intended to keep them safe from harm. Individuals can make a complaint on behalf of someone else as a third party, even if they were not directly affected by the alleged harm.</p>
Concern	<p>The Global SHEA and Safeguarding Team uses this term to define SHEA and Safeguarding issues raised that are not, or not yet, a formal complaint. For example, a group of staff speaking about rumours they have heard about sexual exploitation in a refugee camp or in a particular office. It is vital that concerns raised are responded to as this is a critical way of ensuring survivors and complainants are listened to and ActionAid follows up on all issues as part of our commitment to creating safe working environments for all</p>
Female genital mutilation	<p>Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. FGM is recognized internationally as a violation of the human rights of girls and women.</p>
Forced marriage	<p>Marriages in which one and/or both parties, whether adults or children, have not personally expressed their full and free consent to the union.</p>
Grooming	<p>Grooming is when an individual deliberately tries to gain a child's trust for the purpose of carrying out sexual abuse or exploitation (e.g. favouring a</p>

	<p>child, giving them gifts, using sexualised language or physical contact, or exposing the child to sexual concepts and sexualised language). This can happen face to face or online. It is common for children not to understand that they have been groomed or that this is a form of abuse.</p> <p>Offenders may also groom adults in order to enable the abuse of children (for example, persuading those around them that they are safe and responsible individuals so that they allow children in to their care or do not believe children when they raise concerns about this individual).</p>
Investigation	At AAI this will take the form of an internal fact-finding process. The decision will be based on the balance of probabilities rather than beyond all reasonable doubt
Modern slavery	Slavery is a situation where a person exercises perceived or real power of ownership over another person. Modern slavery covers different types of labour exploitation, ranging from the mistreatment of vulnerable workers to human trafficking to child labour and forced sexual exploitation.
Rights holder	A rights holder is someone working directly with (e.g a programme participant) ActionAid or receiving assistance through ActionAid's work.
SHEA and Safeguarding Focal Point	A person within an organisation designated to receive concerns and complaints of cases of sexual abuse, exploitation, and harassment. And take responsibility for embedding safeguarding into their respective offices and programmes.
Subject of concern	The person alleged to have carried out harm.
Survivor	A person who has experienced sexual abuse, exploitation, or harassment. AAI uses the term <i>survivor</i> as part of our survivor-centred approach as it emphasises the power of the individual, which the term <i>victim</i> can remove, and their agency. However, it is important that those affected by sexual abuse and exploitation can choose the term they prefer
Survivor-centred approach	A survivor-centred approach puts the survivor of harm at the centre of any response. Recognising that violence, particularly sexual violence, is carried out in order to remove power a survivor-centred approach works to place the power back with the survivor. Survivor-centred approaches must consider the rights, choices, dignity, confidentiality, and safety of the survivor at all times and ensure that the survivor, their family, and their community do not come to any further harm as a result of having chosen to report an incident.
Trafficking	Trafficking is a process of enslaving, coercing, and exploiting people. People can be trafficked for many different forms of exploitation such as forced transactional sex, forced labour, forced begging, forced criminality, domestic servitude, and forced marriage, and forced organ removal
Transactional sex	This is the exchange of money, employment, goods, or services for sex, including sexual favours. Transactional sex is strictly prohibited by ActionAid along with any other forms of humiliating, degrading or exploitative behaviour, including exchange of assistance that is due to rights holders. ActionAid does not make judgement against rights holders or others who choose to take part in such transactions but recognises the inherent unequal power dynamic and so prohibits staff from exchanging money or anything else for sex.
Young people	Persons between the ages of 15 and 24 years.

For more information on SHEA and Safeguarding definitions please see the Global SHEA and Safeguarding Team *SHEA and Safeguarding Glossary*.