

Child Safeguarding **Policy**

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Cross Reference/ Related policies:

- Protection from Sexual Exploitation and Abuse (PSEA) Policy
- Sexual Harassment, Exploitation, and Abuse (SHEA) at Work Policy
- Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding concerns Overarching Policy

Child Safeguarding Policy

Policy for all staff and representatives

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Sponsor: Julia Sanchez, Secretary General. The policy has been approved by ActionAid International's Board of Trustees and Senior Management

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1. Introduction

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.

ActionAid will not tolerate any form of abuse, exploitation, or harm carried out towards children (defined as anyone under the age of 18).

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

Every aspect of our work must be carried out in a way that ensures the safety, rights, dignity and empowerment of children. We are committed to engaging with children in a way that recognises their agency, individuality and value, and work with them to ensure they are not only safe *from* harm but safe *to* realise their rights and become active agents of change.

Building on our Code of Conduct and feminist approach, ActionAid is committed to **preventing** any form of sexual harassment, exploitation and abuse and **responding** robustly when these harms take place. We recognise that all these harms are rooted in an imbalance of power, particularly gendered and sexualised abuses of power, and in the case of children – imbalances of power between children and adults. The #metoo and #aidtoo movements of recent years have reminded us that those working with ActionAid have increased power and privilege and we must do everything we can to stop staff/representatives from abusing the power and privilege they hold.

We have a duty to prevent and respond to allegations of harm and risk to children because of the power imbalances inherent in the international aid sector, and within the wider social norms and structures in which we work. When addressing child abuse, we are committed to addressing all forms of abuse – physical, psychological, sexual abuse, and neglect. This means that we take all concerns seriously and carry out timely and robust responses to allegations of abuse. No one will be victimised for making a complaint and ActionAid is committed to taking a survivor-centred approach throughout. This means we work with survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.¹

ActionAid views any form of child abuse as a gross violation of human rights. We are committed to the UN Convention on the Rights of the Child but our approach extends this to give detailed guidance on how to ensure all children are safe. In line with Feminist Principle 10 (Zero Tolerance), we will not tolerate any form of abuse, exploitation, or harm carried out towards our own employees, rights holders, communities, or anyone we come into contact with through our work. Zero tolerance means we will always take action when a Safeguarding harm takes place, ensure that support is offered to all affected, and that the organization learns from the harm so it does not happen again.

We recognise that gendered forms of sexual violence disproportionately affect women and girls, and our work also recognises the impact on boys, men, transgender and non-binary people. We are committed to having an inclusive safeguarding approach and working with marginalised, oppressed

¹ We use the term 'survivor' to represent a person who has experienced sexual abuse, exploitation, or harassment. AAI uses the term *survivor* as part of our survivor-centred approach as it emphasises the power of the individual, whereas the term 'victim' can be disempowering. However, those affected by sexual harassment, exploitation and abuse can choose the term they prefer. Throughout any process, AAI will work with all involved to ensure the rights of everyone are protected at all times.

and hard-to-reach groups, recognising the impact of sexual violence on people living in poverty, people in the LGBTQI community, and people of different ethnicities, religions, race, class and abilities. We will listen to and learn from them and work so SHEA and Safeguarding approach supports the work they do to promote their rights and live lives with dignity. Intersectional feminism shows us that in order to defeat patriarchy, we need to address the other forms of oppression that reinforce it. As part of living out our feminist principles, we will champion intersectionality by recognizing the diverse and connected experiences of different groups and take action to ensure we do not compound harm. We will take action to ensure our approach is anti-racist, inclusive, and safe for all.

1.1 Purpose

The #metoo and #aidtoo movements of recent years have reminded us that those working with ActionAid have increased power and privilege and we must do everything we can to stop staff/representatives from abusing that power. We are committed to safeguarding all people who come into contact with ActionAid from abuse of that power and privilege in any form.

This applies to everyone irrespective of race, age, gender, gender identity, sexual orientation, culture, dress, language, political affiliation, health status, class, caste, ethnicity, marital status, disability, location, pregnancy, and religion. Inequality, exclusion, and discrimination towards children will not be tolerated.

ActionAid is committed to the principles and rights promoted in the Convention of the Rights of the Child 1989² and the Universal Declaration of Human Rights 1948³. We believe that **all children** have a right to be protected from abuse, exploitation, and harm. We recognise that some children can be additionally vulnerable because of their gender, ethnic origin, disability status or other factors. We have a responsibility to protect the welfare of all children, recognizing their different needs and experiences. In all actions concerning children, their welfare is paramount.

² <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

³ <http://www.un.org/en/universal-declaration-human-rights/>

ActionAid recognises that we have a duty to respond to all concerns raised to us relating to children regardless of whether or not the alleged harm results from actions taken or not taken by ActionAid. For example, abuse carried out by an individual from a community we work with or a staff member at another agency.

This policy provides guidance and direction to anyone associated with ActionAid so that:

- All ActionAid staff and other representatives understand the importance of safeguarding children, recognises how it intersects with their work, and their responsibility to ensure they and their work do not deliberately or inadvertently cause harm to children.
- All ActionAid staff and other representatives understand their role in keeping children safe, and the consequences for breaching this policy
- All ActionAid staff and other representatives understand their responsibility to report any concerns relating to child abuse and have access to clear guidelines on how to report suspected abuse.
- All organisational processes and structures reflect our duty of care towards children and put in place procedures to safeguard children in every aspect of our work so that we build a culture free from abuse, exploitation, discrimination and harm.
- All ActionAid operations and programming must be designed with a safety lens; all activities of ActionAid must prevent harm to communities and rights-holders; Child Safeguarding, PSEA and Safeguarding against Sexual Harassment and Abuse should be central to all interventions and should be included in all programme activities.
- ActionAid commits to uphold the highest level of personal and professional conduct amongst its staff, contractors, volunteers, board members and partners working in or visiting all programming contexts, and particularly humanitarian settings, ensuring zero tolerance of all forms of exploitation and abuse carried out towards children.

Note on language: This policy is called the *Child Safeguarding* policy and replaces the *Child Protection* policy. The Child Safeguarding Policy supersedes the Child Protection Policy and the previous Child Safeguarding policy, as such all future incoming policies will be presumed to replace previous existing policies. Child safeguarding cases that are being addressed under an older version of this policy will automatically be handled under this new policy. We use the term *safeguarding* rather than *protection* as the term *safeguarding* refers to ensuring the rights of all children, while protection generally refers to protecting the rights of specific children who are identified as suffering or more likely to suffer harm. ActionAid recognises the particular safeguarding challenges presented by working with young people. We have included information on this area in this policy, and we are committed to strengthening our approach to safeguarding young people through further stand-alone work.

1.2 Difference between ActionAid's Protection from Sexual Exploitation and Abuse; Sexual Harassment, Exploitation, and Abuse at Work; and Child Safeguarding policies

ActionAid's SHEA and Safeguarding approach seeks to prevent and robustly respond to all forms of sexual harassment, exploitation, abuse, and other safeguarding harms carried out by ActionAid staff and other representatives towards anyone we come into contact with through our work. ActionAid's SHEA and Safeguarding approach and policy positions are outlined in the *ActionAid International SHEA and Safeguarding Overarching Policy*.

We recognise the ways in which these 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 our policies distinguish between them. The below table shows the

different forms of harm and what policy they sit under:

Form of Harm	Policy this falls under
Harmful behaviour carried out by staff/representatives towards other staff and representatives	<i>SHEA and Safeguarding policy</i>
Harmful behaviour carried out towards children and young people	Addressed through this policy
Harmful behaviour carried out towards rights holders and communities, including adults at-risk	<i>Protection from Sexual Exploitation and Abuse policy</i>
Bullying and Harassment	<i>AAI Bullying and Harassment policy</i>
Illegal and/or improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, or miscarriages of justice	<i>AAI Whistleblowing policy</i>
Allegations of trafficking or modern slavery	<i>AAI Anti Slavery and Human Trafficking policy</i>

1.3 Scope

This policy is binding for all offices and working locations of ActionAid, and at both the organisational and project level. Policies created by ActionAid entities must include all elements of this policy and may only differ to ensure alignment with national legislation as appropriate. If national legislation requires a substantively different approach to the global policies, this must be discussed with the Global SHEA and Safeguarding Team and they must jointly work to ensure that the national policy is in line with the spirit of the global policy where he cannot meet the letter of the policy. Should this policy demand a higher standard than the local laws then this policy will prevail. This policy supersedes previous policies on SHEA and Safeguarding.

This policy is binding for all ActionAid staff members, whether full time, part time or engaged on fixed term contracts. **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.** 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/representatives life. **All staff and representatives named above can raise a complaint via the procedures outlined in this policy. All community members and rights-holders including adults at-risk and children can raise a complaint about any ActionAid staff member or representatives, using the channels as outlined in the 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 three years**. ActionAid Directors/International Leadership Team and International Board may hold departments accountable to ensure that they align their work to this policy and embed child safeguarding in their work.

Adherence to this policy will be reviewed through ActionAid's internal Assurance and 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.

If the Global SHEA and Safeguarding Team have concerns that an ActionAid entity is not implementing SHEA and Safeguarding as outlined in this policy the Global SHEA and Safeguarding Team will raise this first with the Country/Executive Director for action. If no action is taken within one week (e.g agreeing to a meeting, or developing an action plan), the Global SHEA and Safeguarding Team will inform the Head of Country Support who will follow up with the Country/Executive Director and request a response within 48 hours. If no action is taken, or there is sustained in-action by an entity, this will be raised to the International Leadership Team and if needed to the International Board for wider action.

1.4 Feminist Leadership Principles

ActionAid's SHEA and Safeguarding approach is built on our Code of Conduct and feminist leadership approach.

ActionAid's transformative vision of a just world free from poverty, oppression and patriarchy requires transformative feminist leaders: leaders who enable others to lead, building power with them instead of over them.

ActionAid has developed the following 10 commitments on feminist leadership. Staff and other representatives are expected to embed these into every area of their work and their behaviour:

1. Self-awareness
2. Self-care and caring for others
3. Dismantling bias
4. Inclusion
5. Sharing power
6. Responsible and transparent use of power
7. Accountable Collaboration
8. Respectful Feedback
9. Courage
10. Zero Tolerance

These feminist principles are embedded throughout our SHEA and Safeguarding approach.

For further information on these principles, please refer to ActionAid's Top Ten Basics of Feminist Leadership.

2. Definitions and Policy Positions

In line with ActionAid's Code of Conduct and mission, ActionAid:

1. Strictly prohibits staff and other representatives from engaging in or promoting any form of abusive, exploitative or harmful behaviour towards children.
2. 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.
3. Affirms that all staff and other representatives have a duty to protect the rights of children, ensure that ActionAid's SHEA and Safeguarding approach is embedded into all areas of ActionAid's work, and ensure that every aspect of our work is carried out in a way that ensures the rights, dignity and empowerment of children.

Definitions

Child	<ul style="list-style-type: none"> - “any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.” <ul style="list-style-type: none"> o This definition is in line with the <i>UN Convention on the Rights of the Child</i>⁴, given our human rights-based approach to SHEA and Safeguarding. 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.
Child abuse	<ul style="list-style-type: none"> - 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 by WHO as physical abuse; sexual abuse; psychological abuse; and neglect. <ul style="list-style-type: none"> o <u>Physical</u> abuse can include inappropriate physical punishments towards a child, and/or assaulting, pushing, hitting, and slapping them. o <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. o <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. o <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. <ul style="list-style-type: none"> ▪ 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.
Sexual abuse	<ul style="list-style-type: none"> - The UN Secretary General defines sexual abuse as the “actual or threatened physical intrusion of a sexual nature, whether by force or under unequal conditions e.g. sexual assault, rape. <ul style="list-style-type: none"> - 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. - If a child attempts to initiate a sexual relationship with ActionAid staff/representative, the responsibility lies with the staff/representative to refuse in line with the provisions in this policy. If a staff/representative acts on a child’s request for a sexual relationship, the ActionAid staff or representative will be held accountable under this policy, given the power dynamic and their responsibilities
Sexual exploitation	<ul style="list-style-type: none"> - The UN Secretary General defines sexual exploitation as “any actual

⁴ <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

	<p>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”⁵</p> <ul style="list-style-type: none"> ○ 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. ○ It is important to understand that sexual exploitation is not limited to sexual intercourse, as detailed in some examples above, and includes acts of intimidation of a sexual nature that are intended to cause discomfort and embarrassment.
<u>OTHER RELEVANT TERMS</u>	
Adolescent	<ul style="list-style-type: none"> - Adolescents are individuals aged between 10-19 years. <ul style="list-style-type: none"> ○ Adolescence is one of the most rapid phases of human development during which biological maturity precedes psychosocial maturity. Younger adolescents may be particularly vulnerable when their decision-making capacities are still developing, and they are beginning to mix with people outside the confines of their families. <ul style="list-style-type: none"> ▪ Please also refer to <i>young person</i> definition
Child labour	<ul style="list-style-type: none"> - According to the International Labour Organization (ILO), child labour is defined as work that deprives children of their childhood, their potential and their dignity. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and interferes with their schooling by depriving them of the opportunity to attend school. - Some countries have laws and policies that allow children to work. When considering whether such work amounts to child labour or not, consideration should be made to the national laws and policies of that country on child labour alongside the definition of the ILO. Should the ILO definition demand a higher standard than the national laws and policies, then the ILO definition shall take preeminence. - Reported child labour allegations will be handled with support from Protection colleagues.
Child marriage	<ul style="list-style-type: none"> - A formal marriage or informal union involving someone aged under 18. <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 protection	<ul style="list-style-type: none"> - This refers to activities or processes that focus on “preventing and responding to violence, exploitation and abuse against children – including but not limited to commercial sexual exploitation, trafficking, child labour and harmful traditional practices.” <ul style="list-style-type: none"> ○ Child protection is part of wider safeguarding activities and refers to activities that are undertaken to protect

⁵ <http://pseataforce.org/en/overview>

	<p>specific children who are suffering or likely to suffer significant harm. This includes procedures which detail how to respond to concerns about a child.</p> <ul style="list-style-type: none"> ▪ Please refer to definitions of <i>child safeguarding</i> and <i>safeguarding</i> ○ More than half the people affected by disaster and conflict are children and the risks children face are exacerbated by living in these contexts. Therefore, it is vital that ActionAid addresses issues of child protection across our work and on a global level.
Child safeguarding	<ul style="list-style-type: none"> - Child safeguarding is the action that is taken to promote the welfare of all children and protect them from harm. In practice it means: <ul style="list-style-type: none"> ○ protecting children from abuse and maltreatment ○ preventing harm to children's health or development ○ ensuring children grow up with the provision of safe and effective care ○ taking action to enable all children and young people to have the best outcomes ○ ensuring an organisation's processes or procedures do not deliberately or inadvertently cause harm to children - Please also refer to <i>Safeguarding</i> definition and <i>Child Protection</i> definition
Child sexual exploitation	<ul style="list-style-type: none"> - This can take the form of commercial and/or online sexual exploitation of children: <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). <ul style="list-style-type: none"> ▪ 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
Community member	<ul style="list-style-type: none"> - A person living in a community within which ActionAid operates, however, they are not necessarily engaged with any programmes.
Complainant	<ul style="list-style-type: none"> - 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.
Complaint	<ul style="list-style-type: none"> - The specific grievance of anyone who has been negatively affected by an individual's action towards them, or who believes that an organization has failed to meet a stated commitment that is intended to keep them safe from harm. <ul style="list-style-type: none"> ○ 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.
Convention on the Rights of the Child	<ul style="list-style-type: none"> - United Nations Convention on the Rights of the Child is a human rights treaty which sets out the civil, political, economic, social, health

	<p>and cultural rights of children. The Convention defines a child as any human being under the age of eighteen, unless the age of majority is attained earlier under national legislation. ActionAid works in full recognition of this treaty in line with our organizational values and goals.</p>
Digital Safeguarding	<ul style="list-style-type: none"> - ActionAid recognizes the risk that staff/representatives could carry out online sexual harassment, exploitation, and abuse. ActionAid has a responsibility to protect staff/representatives, community members, young people and children that it engages with on online spaces. <i>(For more guidance please refer to: ActionAid, Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response, 2020)</i>
Female genital mutilation	<ul style="list-style-type: none"> - "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." <ul style="list-style-type: none"> o FGM is recognized internationally as a violation of the human rights of girls and women. It reflects deep-rooted inequality between the sexes and constitutes an extreme form of discrimination against women. It is nearly always carried out on minors and is a violation of the rights of children. o The practice also violates a person's rights to health, security and physical integrity, the right to be free from torture and cruel, inhuman or degrading treatment, and the right to life when the procedure results in death.
Forced marriage	<ul style="list-style-type: none"> - Marriages in which one and/or both parties, whether adults or children, have not personally expressed their full and free consent to the union. <ul style="list-style-type: none"> o As is the case with child marriage more specifically, this is something ActionAid campaigns against given our human rights-based approach.
Gender-based violence (GBV)	<ul style="list-style-type: none"> - "Gender-based violence is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females" <ul style="list-style-type: none"> o Acts of gender-based violence are a form of sexual abuse and can affect any stakeholder, whether staff or community members. o They are often carried out by men towards women and can result, in part, from power imbalances. Therefore, this is regarded as a significant SHEA and Safeguarding issue within the operating context of AAI.
Grooming	<ul style="list-style-type: none"> - Grooming is when an individual deliberately tries to gain a child's trust for the purpose of carrying out sexual abuse or exploitation. <ul style="list-style-type: none"> o An offender may seek to build a sexual relationship with a child having purposefully built a trusting relationship with them in advance in order to enable this (e.g. favouring a 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. o Offenders may also groom adults in order to enable the abuse of children in their care to take place (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).
Modern slavery	<ul style="list-style-type: none"> - 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. <ul style="list-style-type: none"> o Related terms include human trafficking, covering coercion and recruitment under false pretenses, and bonded and forced labour, which is labour undertaken as a repayment or under threat of punishment respectively.
Rights holder	<ul style="list-style-type: none"> - A rights holder is someone receiving assistance through ActionAid's work. This is alternatively referred to in other organizations as a member of the affected population, person we seek to assist, person affected by crisis, or beneficiary. A <i>rights holder</i> is different to a <i>community member</i> in that a <i>community member</i> may not be engaging in our programmes and ActionAid must therefore be more aware of the risks that they face.
SHEA and Safeguarding Focal Point	<ul style="list-style-type: none"> - A person within an organization designated to receive concerns and complaints of cases of sexual abuse, exploitation, and harassment. <ul style="list-style-type: none"> o Within AAI we are developing a network of trained SHEA and Safeguarding Focal Points across countries. These are people designated to receive disclosures, as detailed above, take responsibility for embedding safeguarding into their respective offices and programmes, and act as a first point of contact to any SHEA and Safeguarding queries that staff and rights holders may have.
Staff/Representatives	<ul style="list-style-type: none"> - This refers to "staff, volunteers (including board and assembly members), consultants, interns, visitors, dependents accompanying staff while working for ActionAid, and other individuals acting as representatives of ActionAid, such as partners working in communities." When we refer to staff and other representatives in the document we are referencing this entire group. <ul style="list-style-type: none"> o This is not an exhaustive list and covers anyone who is a representative of ActionAid including individuals acting in the capacity of agents or implementing on behalf of representatives of ActionAid e.g. teachers working in the community schools through a partner's project. ActionAid may not have the jurisdiction or expertise to take action on cases where individuals are not directly under ActionAid or partner authority, but will do everything it can to raise to relevant authorities and ensure any action undertaken by others has the child's best interest at heart.
Survivor	<ul style="list-style-type: none"> - "...a person who has experienced sexual abuse, exploitation, or harassment. <ul style="list-style-type: none"> o The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency." - AAI uses the term <i>survivor</i> as part of our survivor-centered approach as it emphasizes the power of the individual, which

	the term ‘victim’ can remove, and their agency. However, it is important that those affected by sexual harassment, exploitation and abuse can choose the term they prefer
Survivor-centred approach	<ul style="list-style-type: none"> - “Originating from feminist analysis of violence against women, a survivor-centred approach puts the survivor of violence or harm at the centre of any response and process. Recognising that violence, particularly sexual violence, is carried out in order to remove the power of the person experiencing the harm a survivor-centred approach works to place the power back with the survivor.” <ul style="list-style-type: none"> ○ Survivor-centred approaches must consider the rights, choices, dignity, confidentiality, and safety of the survivor. This ensures 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	<ul style="list-style-type: none"> - Trafficking is a process of enslaving people, coercing them into a situation with no way out, and exploiting them. - 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	<ul style="list-style-type: none"> - This is the exchange of money, employment, goods, or services for sex, including sexual favours. <ul style="list-style-type: none"> ○ 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	<ul style="list-style-type: none"> - ActionAid defines a young person as anyone between the ages of 15 and 24 years. We note that in some countries, the age of a young person goes up to the age of 30, and so these provisions will apply to those people in such contexts. It is helpful to distinguish between teenagers (13-19) and young adults (20-24) as ability to manage behaviors and experiences differs between the two age groups. Young people under the age of 18 are still defined as children under the UN Convention of the Rights of the Child and are protected as children under this policy. This recognizes that while a person under the age of 18 may be defined as a young person and may have reached the age of majority, age of consent or voting age in their countries there are still vulnerabilities that exist, particularly for children and young people from marginalized groups.

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

3. Confidentiality

Confidentiality is vitally important to SHEA and Safeguarding. We are committed to working with

survivors/complainants and all others involved in an incident management process in a confidential and respectful manner. Breaches of confidentiality undermine confidence and trust in ActionAid's safeguarding and complaints management processes and in the organization itself. Maintaining confidentiality around people's personal data and information is particularly important when managing issues relating to sexual harassment, exploitation and abuse and is part of living out our survivor-centered approach.

From the point of disclosure to the final outcome of any investigation, every effort will be made to maintain and promote confidentiality in order to protect the safety and privacy of everyone involved.

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 in question is always paramount. As noted above, only those who need to know will be informed so they can take effective action.

3.1 Data Protection

ActionAid will ensure that it complies with local and international data protection laws when gathering, storing, or sharing any data relating to individuals and SHEA and Safeguarding (e.g. in our fundraising, communications, and incident management approach), and will follow the Data Protection policies owned by the Digital and Technology Team and guidance on retaining data on SHEA and Safeguarding incident management that is issued by the Global SHEA and Safeguarding Team. Any breaches of ActionAid's data protection guidelines, particularly if they put individuals at risk, will be treated as serious misconduct.

4. Working with partners

- ActionAid will work collaboratively with partners to create safe working approaches that uphold the rights of all. Building on ActionAid's Partnerships Framework, engagement with partners on safeguarding will be based on mutual respect and learning.
- ActionAid will work with partners to create programmes and operational approaches which uphold the rights of staff, community-members, rights holders and children at all times.
- ActionAid partners must abide by ActionAid's Code of Conduct and all SHEA and safeguarding related policies. All memorandum of understandings (MoU) with partner organisations and consultancy agreements with consultants and suppliers should include this policy as an appendix when starting any project. Breaches can lead to termination of contractual and/or partnership agreements.
- ActionAid will work with all partners to ensure they receive training on ActionAid's SHEA and Safeguarding policies and approach, and to ensure that spaces are created to share knowledge on best practice to address child abuse and recognise the expertise of our partners in this area as well as our own approach.
- Staff working with partners must ensure that partner organisations and their staff and other representatives sign up and abide by the ActionAid Code of Conduct. ActionAid must work with partners to carry out SHEA and Safeguarding risk assessments and/or ensure that partners carry out their own SHEA and Safeguarding risk assessments.
- ActionAid partners, by the nature of their work, interact with children and will therefore be aware of sensitive information concerning children. ActionAid will work with partners to ensure that partners have a robust reporting mechanism for partner staff and children to access. ActionAid and partners must have agreements in place to ensure that concerns relating to

SHEA and Safeguarding (for partner staff and children) is shared through designated roles to maintain confidentiality.

- Concerns regarding partner staff members must be reported immediately via the reporting mechanisms detailed below (see Appendix 5: Reporting Flowchart). If ActionAid receives a complaint about a member of staff at a partner organisation, ActionAid will risk assess informing the partner with the aim of working with the partner to ensure this is responded to quickly and appropriately in line with ActionAid's policies and values. ActionAid will support a partner's capacity to manage a concern, for instance if the partner is engaging well but does not yet have the resources to respond. If appropriate, concerns will be managed through a joint process or by ActionAid if appropriate. If there is reason to believe that a complaint has been dealt with inappropriately or inadequately by a partner, ActionAid must consider whether they will withdraw funding or end the relationship.

5. Safer recruitment and employee lifecycle

In line with best practice, stringent recruitment processes will be put in place to ensure that staff/representatives share our values and in order to reduce the likelihood of engaging someone who may pose a SHEA or safeguarding risk to the communities we work with, and to staff and other representatives within the organisation. The following steps must be included in all Recruitment and Selection procedures:

- Job adverts and job descriptions clearly detail any role responsibilities relating to children, and the organisational values and commitment to SHEA and Safeguarding. The job description is to be used as the primary basis of assessing an applicant's abilities.
- All interviews will include questions that assess an applicant's understanding of SHEA and Safeguarding (including child safeguarding) and assess their ability to reflect on ActionAid's values and feminist approach.
- Interviews for positions that involve working with children must include behavioural based questions that assess the candidate's suitability to work with children.
- Gaps in employment and/or education history will be discussed at interview.
- ActionAid will not knowingly appoint any person with a history of perpetrating any form of sexual harassment, exploitation, and abuse, e.g. child abuse, or Gender Based Violence. ActionAid will ensure that recruitment of staff and other representatives will include reference checks (written and verbal where necessary).
 - Consent will be sought from the successful applicant to request two references, including one from their most recent employer (or place of education), which provides, where permitted, the reason for leaving, and where appropriate, whether the candidate is suitable to work with children.
- Relevant police/criminal records checks must be carried out in line with country requirements, as appropriate. Staff and other representatives in roles that involve having direct access to rights holders and community members, particularly children, will require a self-disclosure of any convictions (relating to child abuse in any form) prior to interview stage and a criminal record check, wherever this is obtainable.
 - This also applies to staff changing role internally, and those who are likely to be deployed, in which case a check should be completed in advance. In countries that have a database of sexual offenders or people not suitable to work with children then this too will be checked.
- Proof of identity should be confirmed at the interview stage, and a hard copy added to the staff file
- The Code of Conduct and the SHEA and Safeguarding overarching policy are included alongside the offer letter to all new staff and representatives. The Code of Conduct must be signed by all staff and other representatives before commencing duties.
- HR staff drafting employment contracts should, where possible under national law, include a clause that specifies the staff member can be dismissed if they are found to have breached this policy or AAI's Code of Conduct.

- All performance management processes and appraisals must include an assessment of how the individual upholds ActionAid's values and how SHEA and Safeguarding intersects with their work
- Ensure exit processes are carried out in person or remotely, learning is recorded and acted upon as appropriate, and any SHEA and Safeguarding concerns raised at this stage are addressed appropriately
- Ensure references are provided in line with our HR policies, and that information on staff SHEA and Safeguarding misconduct/disciplinary proceedings is shared with the prospective employer in line with global best practice and our HR procedures

It is recognised that it may be difficult or impossible to obtain police checks, statutory declarations of previous convictions, and references in some operating contexts, or that time constraints in humanitarian contexts may justify the need to start work before obtaining the outcome of the police checks. In such instances, other checks must be put in place. Recruiting managers must ensure they put in place all reasonable steps to manage risk including extensive questions on safeguarding and ActionAid's values at interview, and a more intensive form of reference check (e.g. mandatory written submissions and telephone conversations with referees). Line managers and HR should also use the probationary period to observe the employee for any signs of policy violations that should be dealt with expeditiously and in accordance with this policy.

Where police checks/references raise concerns about the suitability of the candidate and ActionAid takes the decision whether to proceed with the recruitment; justification for the decision to proceed must be recorded in the HR files and signed off by the Country/Executive Director and by Cluster Directors in the General Secretariat.

5.1 Induction

The SHEA and Safeguarding Focal Point and HR will ensure all joining staff and other representatives have an induction on ActionAid's SHEA and Safeguarding approach and this policy **no later than one month** after they have been appointed. It is the responsibility of the individual's Line Manager to ensure that this briefing is carried out. Depending on the nature of the role, more extensive inductions on ActionAid's SHEA and Safeguarding approach and country-specific risks and challenges should be carried out.

5.2 Training

Regular training and refresher courses on SHEA and Safeguarding must be planned and delivered for all staff and partners on a regular basis. This can include but is not limited to:

- AAI's SHEA and Safeguarding policies
- AAI's Code of Conduct and Feminist Leadership Approach as part of our commitment to working with staff and other representatives to transform our working culture
- International and local laws relating to sexual exploitation and abuse, including child abuse
- Information on how to recognise sexual exploitation and abuse, including child abuse
- Information on how to report sexual exploitation and abuse, including child abuse

All programmes must establish a training programme, including stand-alone and refresher training on ActionAid's SHEA and Safeguarding approach so that all staff receive at least one SHEA and Safeguarding training per year, with further training for specific teams as required. Evidence of training must be captured and retained (e.g. training attendance records, training materials). Informal discussions in team meetings are also encouraged. Further communications on ActionAid's SHEA and Safeguarding approach could include information campaigns, regular updates on new developments in the sector, or policy revisions.

Further specialist SHEA and Safeguarding training will be provided depending on the nature of the work being undertaken, the context, donor requirements, and where staff and other representatives are in contact with children or other vulnerable populations, such as displaced communities. The SHEA and Safeguarding Focal Point, in line with the Global SHEA and Safeguarding Team, will work together to identify and address these needs.

6. Safer programming

ActionAid recognises that safeguarding children must be integral to its humanitarian, resilience and wider development work. All programme activities must be carried out in a way that ensures the rights, dignity and empowerment of children and recognizes their agency, individuality, and value.

We must recognise that rights holders and communities, including children, can be harmed as a result of poorly designed programmes and projects, and related activities. Staff members/representatives responsible for programme or project design and implementation must ensure that SHEA and Safeguarding is accounted for at all stages of the programme/project cycle. It is important for safer programming measures such as risk assessments to be carried out even for programme activities that do not explicitly engage with children.

Internal misconduct can affect our programming, as an ActionAid staff member or representative's behavior towards colleagues can indicate the level of risk towards rights holders, at risk groups including children, and the communities in which ActionAid works.

- Ensure SHEA and Safeguarding is embedded into the entire programme cycle, from design to conclusion, and that budget is included for Child Safeguarding activities.
- Ensure the active participation of rightsholders in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods;
- Recognise that sexual exploitation and abuse is often grounded in gender and other inequalities, ActionAid will ensure that development and humanitarian activities are conducted in a gender-sensitive manner, drawing on intersectional feminist analysis. This will include:
 - Ensure that programmes are designed in an inclusive way and with a safety and child rights lens so that those who are most marginalized can access the programme and realize their rights.
 - Creating separate spaces for children, young people, women, men, transgender and gender non-binary people to raise concerns and share ideas;
 - Creating safe spaces for consultation and monitoring of programme activities based on strong contextual intersectional feminist and power analyses;
 - Having a clear risk assessment in place for all programmes outlining sexual exploitation and abuse and safeguarding risks within the programme and putting in place measures to address these in programme plans (e.g. looking at where and when activities take place, assessing staff and representatives (including drivers, partners etc) awareness of risks, ensuring services are safe and accessible etc.).
 - As programmes close, embed SHEA and Safeguarding into exit strategies and monitoring and evaluation processes to ensure that learning has been documented and taken on board, and any concerns that exist can be addressed.
- All development and humanitarian programmes will include community-based complaints mechanisms and reporting processes that are designed in collaboration with communities. A complaints mechanism should be set up to receive both safeguarding and non-safeguarding related concerns. Child friendly community-based and young people friendly complaints mechanisms should also be accessible to children and young people to raise concerns (see the Community-Based Complaints Mechanisms for SHEA and Safeguarding during COVID-19 Guidance Note, 2020).
- . We must enable concerns to be raised internally and externally, be transparent and

accessible to the communities being supported, and ensure that concerns are responded to in a timely and robust manner.

- Work with teams in countries responsible for monitoring and evaluation, and the Global Secretariat, to identify areas for improvement and learning.
- Ensure that this policy is in place, translated into a local language and communicated to and understood by ActionAid staff and other representatives, and the communities we work with
- Ensure that all responses are developed in a manner that balances respect for due process with prioritising the safety, dignity and rights of survivors;
- Integrate and mainstream PSEA into all development and humanitarian work, as well as promote standalone protection programming in humanitarian settings with clear complaints mechanisms;
- Ensure that assistance for those affected is carried out in line with ActionAid's survivor-centred approach
- Ensure that all staff and other representatives recognise their responsibility to maintain an environment that is free of sexual exploitation and abuse and to report any abuse they suspect or witness, whether within ActionAid or outside, in line with the reporting protocols outlined in this policy;
- Ensure as programmes are evolving into digital spaces, staff and representatives' behavior reflects ActionAid's values, adheres to the Safeguarding policies and ActionAid's Code of Conduct.
- Ensure that a copy of this policy will accompany all partner MOUs and discussions held with partners to further embed understanding and compliance.
- ActionAid recognizes that there may be programmes where risks may be heightened e.g. short-term humanitarian projects; in these instances, rigorous safeguarding measures will be put in place, appropriate to the context, e.g. training, regular reviews, displaying messages that humanitarian aid is free, working with partners to ensure safer recruitment and generally incorporating safeguarding into wider response work (see the SHEA and Safeguarding and Safer Programming in ActionAid's COVID-19 Response Guidance Note, 2020).
- **When programming with children**, ensure that children are informed about their rights and how to raise concerns. This can include content on safe/unsafe touching, appropriate and inappropriate behaviours, consent, and how about spotting and reporting signs of abuse. Ensure that staff and all other representatives are informed that ActionAid has raised awareness with children about consent and appropriate behaviours so that they are aware that children are encouraged to report. When online programming with children and young people, ensure that all programmes and activities are designed with a child safety lens so as not to cause intended or unintended harm to children and digital safeguarding measures must be in place (see the Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response Guidance Note, 2020).
- Work with partners to ensure they practice safer recruitment,

6.1 Risk assessments

Risk assessments help identify areas in programme or project design where there is risk of abuse or exploitation taking place, or not being responded to adequately. Safeguarding risk assessments must be carried out at the organisational and project level and integrated into the organisational risk matrix. ActionAid must work with partners to carry out SHEA and Safeguarding risk assessments and/or ensure that partners carry out their own SHEA and Safeguarding risk assessments. Risk assessment should be carried out at the project inception stage and regularly reviewed as part of standardised monitoring activities and monitored by the Senior Management/Leadership Team and the Board.

Efforts should be made by all parties concerned to reduce the identified risks: mitigation strategies must be developed and be incorporated into the design, delivery, and evaluation of all programmes, operations, and activities which in any way involve or impact on children. If this is not possible then the programme/activity should not proceed. Country Programmes and Global Secretariat Hubs are

encouraged to develop risk assessment checklists that are relevant to their contexts and put in place risk mitigation plans at the programme design stage. *Please refer to Appendix 6 for further information.*

6.2 Complaints mechanisms

As part of embedding SHEA and Safeguarding into all programme design and activities, complaints mechanisms must be established in order to ensure that children are able to raise concerns.

A child friendly community-based complaints mechanism is a reporting procedure that is accessible to children and enables them to raise concerns. They are created with children and are informed by children's ideas about their needs. Child friendly complaints mechanisms uphold the rights and voice of children by providing opportunities and platforms for children to be heard.

Staff/representatives should work in a participatory way with children to create, strengthen, and evaluate existing complaints mechanisms in line with best practice, and ensure that the mechanisms used are relevant to the local context, translated into local languages, and made publicly available (e.g. published on the website). As part of our commitment to accountability, staff and representatives must ensure that policies and procedures are shared with rights holders and community members so they can provide feedback and be instrumental in developing our approach.

The SHEA and Safeguarding Focal Point will work with relevant teams to ensure that any complaints mechanisms are accessible, inclusive, survivor-centred, and relevant to the local context (e.g. to ensure that people with disabilities are able to access complaints mechanisms and report concerns). It is critical that any complaints mechanisms provide a variety of ways of reporting (recognising that many people prefer to disclose allegations of abuse or exploitation to someone they trust) and that people are assured of confidentiality.

Staff and representatives should work with relevant internal teams and with children to build child-friendly complaints mechanisms to ensure that children are able to raise concerns and have a voice in how safe spaces are created.

Community-based complaints mechanisms ensure that communities can raise concerns about ActionAid staff/representatives/processes. Communities can use community complaints mechanisms to raise concerns and report incidents of sexual exploitation and abuse. They help to create a strong culture of accountability; enable us to improve the quality, impact and effectiveness of our programmes; and ensure our programmes are safe.

All complaints mechanisms must be established under the principle of 'do no harm'. They must be safe and accessible to use, ensure confidentiality, and not put children and others at risk of harm.

Complaints mechanisms must be inclusive and ensure that diverse groups of children and young people can safely access the mechanisms and are not excluded from these processes, including those who are traditionally marginalized (for example, children with disabilities, children from minority ethnic groups, LGBTQI children).

Staff and representatives managing complaints procedures involving children must be trained to ensure they have the skills and competencies to take complaints of abuse and exploitation from children and that they do this with sensitivity and care, and do not bring any bias or prejudice to those interactions. ActionAid must continually assess the effectiveness of complaints mechanisms and request feedback on these, as part of our accountability to those we work with.

Staff/representatives will be accountable for ensuring that cases are referred and that records are kept securely, in line with our data protection approach.

(For more guidance on Child Friendly Complaints Mechanisms, please refer to ActionAid, 2020, "Community-Based Complaints Mechanisms for SHEA and Safeguarding during COVID-19")

Alongside developing complaints mechanisms, staff, representatives, and partners must continually engage with children about ActionAid's values, what behaviour is and is not appropriate, their rights, and how to report concerns.

6.3 Monitoring and Evaluation

As part of embedding SHEA and Safeguarding into all programme design and activities, staff and representatives must ensure that all monitoring and evaluation activities address SHEA and Safeguarding considerations and that data is analysed and shared so that lessons can be learnt and good practice disseminated. It is necessary to make sure that Monitoring and Evaluation activities such as complaints mechanisms, focus groups, and surveys are suitable for completion by children, that interviews are conducted sensitively, and parents and care-givers are involved where appropriate. From initial needs assessments to final project reports, Monitoring and Evaluation is a vital part of safer programming and ensuring safe outcomes for children.

6.4 Safeguarding and information technology

Technological development has increased the possibilities for risk of online sexual harassment, exploitation and abuse of **children**. Social media and technology evolve rapidly and so we must remain vigilant to ensure that alongside the positive aspects of engaging via different technologies, online platforms and digital spaces, we recognise these provide opportunities for inappropriate contact with children (and others) and we must put safeguards in place.

Staff or other representatives who provide children with access to computers as part of an ActionAid programme or who engage with children and young people on online platforms and digital spaces to facilitate online programmes and activities, must ensure that children and young people know how to use them safely and are able to report any online concerns in order to mitigate the risk of online sexual exploitation and other harmful behaviours.

There are a range of risks to children and young people in the online context. These include:

- Contact Risks – children and young people can be at risk of contact behaviours such as bullying or grooming
- Content Risks – children and young people can access content that is discriminatory, violent, sexual or extremist
- Conduct Risks – young people can adopt risky behaviours such as creating their own sexual content without recognition of the impact (e.g. sexting, sending images of themselves to others) or bullying another young person

In addition to this, young people in parts of the world, particularly politically sensitive or conflict environments, can suffer physical or threats of physical harm because of something they have shared or been part of in an online space. Young people who engage in campaigning, advocacy, or civic action through online channels can be at risk of imprisonment, physical harm and /or social isolation/exclusion. This is a particular risk for women and girls, and members of the LGBTQI community, who often experience increased violence via digital technology. Before engaging with young people on any activity or project, such risks must be discussed with staff, representatives, and young people involved and mitigations put in place.

All Countries/GS should have in place robust IT/digital safeguarding policies which enable the risk of such exploitation to be reduced and procedures in place to address any acts of inappropriate use of technology by ActionAid staff and other representatives, whether relating to children or others. Digital SHEA and safeguarding measures should also be put in place to protect children and young people that ActionAid staff/representatives engage with on online platforms (see the Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response Guidance Note, 2020).

6.5 Programming with young people and children

When carrying out programmes with young people and children, all activities should be designed to promote the empowerment of young people and children to realise their rights and reach their full potential. Any decisions made about young people must be made as far as possible with their participation. Throughout any actions or activities, the wellbeing of the young person(s) is paramount. ActionAid recognises that young people and children are not a homogenous group – we are committed to ensuring that our safeguarding work is done collaboratively with young people and children, and that we take an inclusive approach at all times. This includes recognising that some young people and children will be particularly at risk of experiencing harm, and that we have an additional duty to work with them to mitigate these risks.

It is important that young people and children have the opportunity to participate in risk assessments concerning any activities in which they will be involved. In such risk assessments, young people and children should be encouraged to discuss the social, cultural and political context as well as the individual situation of the young people and children engaging with ActionAid. This should include (but is not limited to) risk factors relating to race, ethnicity, gender identity, sexual orientation and political affiliation.

When carrying out content gathering or research involving young people under 18 years old then informed consent of a parent/legal guardian must be obtained before any action is carried out. Informed consent ensures that the parent/legal guardian and young people understand how their images, stories and videos will be used by ActionAid/representatives of ActionAid. The parent/legal guardian and young people must also understand who will be the audience of the images, stories, and videos that they will share. Once this is understood, then they will be able to understand and give their informed consent for usage. Only use images for which we have consent (*for more guidance see the ActionAid Image Guidelines*). However, even when informed consent is obtained from parents/legal guardians, young people must have the right to refuse to take part. This option must be made clear to them. We must respect their decision to say no and make it clear that there will be no negative repercussions from denying consent. Young people reserve the right to remove any images or stories relating to them from public view at any stage and should be made aware of this.

Young people should not undertake activities supported by ActionAid if:

- They are of compulsory school age and this involvement would or could harm school attendance or academic performance
- It is deemed to put them at risk of violence (e.g. gender-based violence, political violence)
- It involves a risk to their health (e.g. a risk of accidents which they are unlikely to recognise due to lack of previous experience)
- Any other restriction specific to local legislation

Ensure that young people are informed about their rights and how to raise concerns. As a preventative measure, when working with young people include content on safe/unsafe touch, appropriate and inappropriate behaviours, consent, and about spotting and reporting signs of abuse. Ensure that staff and all representatives are informed that ActionAid has raised awareness with young people about consent and appropriate behaviours so that they are aware that young people are encouraged to report.

6.6 Content gathering

ActionAid's duty of care towards children and young people also exists in the process of gathering, aggregating and publishing any communications that could expose them to risk.

A risk assessment must first be conducted to assess whether and how to tell the stories and anonymise the identity of any child who is identified as:

- A victim of sexual abuse, exploitation or abduction, to include girls/boys who have experienced sexual abuse (e.g. sexual abuse, rape), child marriage, FGM, a child who had a child while under 18 years old
- A perpetrator of physical or sexual abuse
- Living with any illness, condition or identity that is known to attract social stigma locally, in their country or internationally– unless in carefully considered contexts the child and legal guardian are certain they want to provide these e.g. in promoting the work of a centre for children of sex workers, or an orphanage.
- Charged or convicted of a crime
- A child combatant or former child combatant.

These stories should be told through illustrations and animations and not through child actors. Should a child actor be used to tell the story, the risk should be assessed, and the filming closely monitored, putting the child's wellbeing first. Psychosocial support should be provided to the child actor when necessary. To protect wellbeing, use of actors is discouraged and preference should be for illustrations and animations to tell these stories.

The following are practices that staff members/representatives must follow in the collection, storage and dissemination of communications material concerning children:

- The child's best interests must always be the primary consideration, and they must be in a safe and conducive environment protected from any kind of abuse.
- Data will be gathered, stored, and shared in line with local and international data protection laws. ActionAid will use testimonies, video and photos for 5 years after which we will contact the rights holder to obtain renewed consent in order to continue using the content. Content will be stored securely in line with data protection standards.
- The content gathering must always be a positive experience for the child, providing a potential for learning and enjoyment.
- Ensure full parental or legal guardian informed consent is received before gathering or using any content relating to children (e.g. interviews, images or footage of children) and that they understand the purpose of this activity and how their testimonies, images or footage will be used without posing any risk to the child.
 - *Please see Appendix 4 for a template consent form. This template should be translated and amended to fit all contexts.*
- Seek the child's free, prior, and informed consent where possible. Never photograph, video or interview a reluctant child, even with parental or legal guardian consent. The child needs to fully understand why they are being interviewed/photographed. For example, you could show examples of how their photos could be used.
- When children/young people are heads of household or already married or parents before the age of 18, the child's/young person's fully informed consent must be obtained, and they should sign both the child and adults' section on the consent form.
- Never gather content that could shame, humiliate or degrade the child, put them at risk immediately or at a later date, or perpetrate any form of emotional abuse, discrimination and exploitation.
- Children should never be depicted in sexual or sexualised, undignified or provocative poses or contexts. Never take images of children with no clothing, appearing to be wearing no clothing or wearing transparent clothing. Do not take any such pictures with the intention of blurring naked areas or using props or photo manipulation to cover naked areas later. Never take pictures of full-frontal nudity and no genitals, nipples or naked bottom clearly visible; any partial nudity is appropriate to age and gender and relevant to the context and ActionAid's work.

- Never use a child to promote the ActionAid brand, e.g. by taking an image of them holding up a banner of our logo – this doesn't apply to our logo being present in the background e.g. on a sign or a sticker on an item.
- Payment and/or gifts must not be given following content gathering as it can be confused with payment for information.
- All content gathering should be carried out by authorised staff or representatives who must be trained on SHEA and safeguarding. Training should include safe content gathering and ensuring that support systems are available for authorised staff/representatives who may be required to collect distressing content. Because of the risks that can result from content being gathered and shared outside of ActionAid's procedures it is strongly advised that no photos/videos are taken by staff, partners, volunteers or visitors to a programme for personal use. All visitors must receive a pre-travel briefing on ActionAid's approach to content gathering and our rights and risk based approach to increase understanding of why we take this stance. If an individual wants to take or share any photos for personal use this must be authorised by an appropriate ActionAid staff member or representative (e.g. Communications Lead, SHEA and Safeguarding Focal Point) prior to any action being taken. They must ensure that any content is taken in line with ActionAid's approach and will be guided at all times by the advice and permission given by the relevant ActionAid staff member or representative. To avoid the risk of children or others being identifiable and/or put at risk, where possible only ActionAid devices should be used to take photos and videos; devices should be encrypted and meta-data such as GPS should be removed, and content should be gathered, in a way that does not identify the location of the child.
- If a contractor is used to gather content, they need to have a contract with ActionAid and have been briefed on this policy, and have signed ActionAid's Code of Conduct. They must understand safe content gathering processes including being required to assess SHEA and safeguarding risks before gathering the content.

For further information on content storage, distribution, and publishing please refer to Appendix 3.

6.7 Emergency response

Emergencies cover a wide range of events, from environmental disasters to politically driven, religious or ethnic conflict. Children are often at much greater risk of violence, abuse and exploitation during and after emergencies particularly due to their age and developmental stage.

During emergencies there is the increased risk of exploitation/abuse by staff, partners, and other representatives (e.g. from a sudden increase in recruitment, agreements being established with new partners quicker than usual). The following provisions during emergencies must be carried out to mitigate risk:

- Ensure that ActionAid's *Child Safeguarding Policy* is in place, translated into a local language and communicated to and understood by all people connected with ActionAid during an emergency. This includes carrying out training, as appropriate, to ensure all ActionAid staff and other representatives are aware of our approach. This should be done as soon as is reasonably possible, and within 2 weeks at the latest. Referral and support mechanisms must be mapped as soon as possible. The Emergency Programme Manager and SHEA and Safeguarding Focal Point are responsible for identifying the relevant statutory authorities (such as the police and/or social services) and other referral mechanisms in the country. An emergency mapping exercise should be carried out with support from the Protection Cluster
- HR will follow safer recruitment and selection procedures as far as possible during an emergency. For example, asking questions around protection of children for those working directly with children and communities.

- Carefully check offers of assistance (e.g. from new staff, partners, and volunteers). Where it is not possible to check backgrounds put measures in place to prevent abuse and exploitation, including carrying out risk assessments, carrying out regular 'spot' checks, ensuring that individuals are not alone with groups of children or have one-to-one time with children.

7. Fundraising

7.1 Child Sponsorship

- All Child Sponsorship activities must be carried out in a way that ensures the rights, dignity and empowerment of children and recognises their agency, individuality, and value.
- All staff members/representatives must take adequate time to explain to the child the meaning and purpose of any activities so that the child understands and gains confidence from how this will contribute to the development of their community. They must explain how the Child Sponsorship process works and how the child and their community will benefit from the program.
- Ensure that parental or care-giver consent is received when children are involved in a programme event (e.g. workshops, campaigns, educational trips), or enrolled in the child sponsorship programme and encourage parental or care-giver participation,
- All staff members and representatives involved in child sponsorship activities (i.e. message collection, photo taking) shall endeavour to make it a positive experience for the child with a potential for learning and enjoyment.
- Staff members or representatives must take time to explain to a child when their sponsor stops their support or withdraws out of the sponsorship programme. Staff/representatives must also take time to explain to a child when they are withdrawn from the sponsorship programme because of unforeseen events in the child's life. When a withdrawal of a child is because of child marriage, child labour or early pregnancy, countries shall put measures in place to follow up with this child and offer support within the child's best interest.
- The consent of the child and parent/legal guardian must be taken in line with agreed standards in *Section 7.6* and using the consent form (see *Appendix 4*).

7.2 Visits

- Supporters, donors and other visitors should receive a briefing on our values and ActionAid's Code of Conduct (with a copy to be signed), *Child Safeguarding policy*, and our SHEA and Safeguarding approach (including instructions on content gathering, appropriate behaviours and how to raise concerns) before any visit.
- Supporters and donors will be required to go through and pay for a criminal background check by the Funding Affiliate they are associated with, should they wish to visit a sponsored child in an ActionAid country.
- Funding Affiliates should advise supporters against posting any photo or details of their sponsored child on any social media. This is for the sake of protection and privacy. This advice should be included in the Welcome Pack for sponsors. Supporters who post images of their sponsored child on social media are in violation of this policy and may face action including being suspended or dropped from the sponsorship programme.
- Funding Affiliates should advise supporters against interacting with sponsored children and their family through social media. Interactions with sponsored children and supporters should always be through ActionAid/ActionAid representatives.
- The ActionAid country hosting the supporter or donor is not permitted to leave a child unattended with the supporter or donor.

- A child should not be taken to where the supporter is located, instead the supporter should visit the child and their family in a public place with ActionAid staff in attendance
- If a donor wishes to gather their own stories or visual content from a child or community, they need to work in close coordination with country staff and follow ActionAid guidelines for doing so, all outputs need to be agreed from the start and outputs will be signed off by ActionAid. An ActionAid staff member needs to be present at all times.
- A donor or supporter should always be accompanied by an ActionAid staff member while visiting a child.
- With increased use of digital spaces and information technology, 'virtual visits' may be considered where supporters are unable to physically visit their sponsored children. Digital SHEA and Safeguarding measures must be put in place to enable 'virtual visits' between supporters and their supported children to take place safely. This will always include an ActionAid staff member being present with the child during the virtual call, and in a public space. These activities must be guided by the SHEA and Safeguarding Focal Point, the global SHEA and Safeguarding Team, and with IT and digital colleagues.

If a donor or supporter is in breach of the Child Safeguarding Policy, action may be taken against them including being suspended or permanently removed from the sponsorship programme.

8. Reporting procedures

The Code of Conduct states that it is the duty and the responsibility of all staff and other representatives to report any suspicions or incidences of sexual harassment, exploitation and abuse. This applies to ActionAid staff and representatives including (but not limited to) partners, volunteers (including board and assembly members), consultants, and contractors/suppliers/vendors. This is a key way to challenge inappropriate behaviors and help create a safe work environment. Failure to report to an appropriate person is a breach of ActionAid's Code of Conduct, and this policy, and could lead to disciplinary action being taken.

If any ActionAid staff or other representatives have concerns that a rights holder or community member, including adults at-risk, has been or it at risk of being abused, exploited, or harmed in any way **they must report this immediately.**

If any ActionAid staff or other representatives have concerns that this policy may have been breached, they must report this immediately.

In line with ActionAid's survivor-centered approach, individuals do not have to report about something that they have experienced.

If you have experienced harm yourself, you can choose if, when, and how you want to tell someone. If you choose to tell ActionAid what has happened to you, we will work with you to discuss your options and find you support.

Members of the public (e.g anyone external to ActionAid) can also raise concerns about ActionAid staff using the reporting procedures below. If the allegation does not relate to ActionAid, such as harm carried out during the course of a staff member's work, then ActionAid will look at how best to safely respond (including raising with external agencies better able to support), and will take any action with the best interests of the survivors in mind.

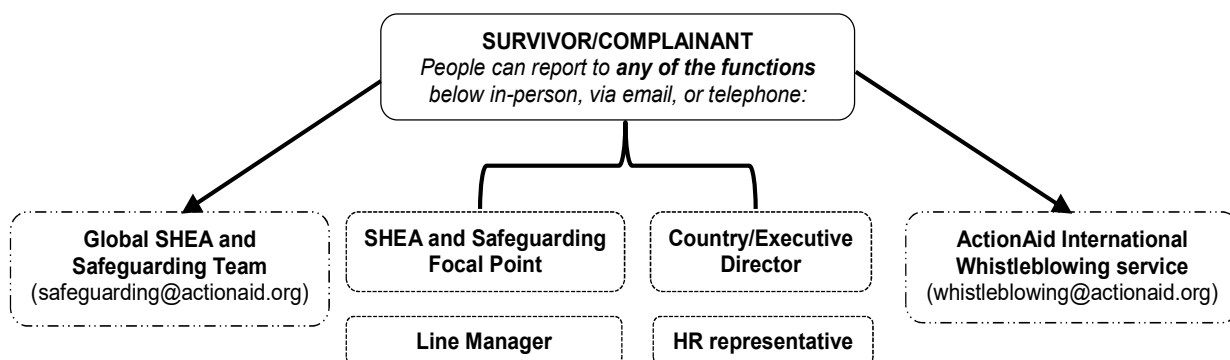
Concerns raised about ex-ActionAid staff/representatives (e.g people formally employed by ActionAid in any capacity) will be addressed as far as possible, recognizing potential legal challenges to such processes.

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
- SHEA and Safeguarding Stakeholder Panel members
- Board Member (eg. SHEA and Safeguarding Board Lead)
- 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)



For a more detailed graphic, see *Appendix 4: Reporting Flowchart*.

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 of a concern being raised, where possible. The Global SHEA and Safeguarding Team will update the global case register and support the Focal Point and ActionAid country on a case by case basis 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 the AAI Donor Reporting SOPs. Any breach of the SOPs will be raised to the CD for action.

Any concerns raised relating to sexual exploitation or abuse of children by ActionAid staff or other representatives will be addressed as a priority, in line with our SHEA and Safeguarding approach. ActionAid will ensure that the safety, dignity and rights of the survivor are respected at all times. 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. For example, by gathering any available evidence and contacting witnesses, where a risk assessment shows it is safe to do so. 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.

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. However, 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 and the decision will be made by the SHEA and Safeguarding Stakeholder Panel, in conjunction with the Global SHEA and Safeguarding Team. This will only be done following clear risk assessments, analysis of the age and agency of the survivor (as decisions may need to be taken on behalf of children, working with their care givers) and will always ensure that the safety and wellbeing of the survivor/complainant is paramount.

Cases relating to children must be treated with urgency, and in line with national laws that regulate reporting of child abuse allegations. ActionAid Countries should have clearly marked referral pathways including established procedures for how child abuse cases will be handled from the time they are reported until when handed over to a service provider. The established procedures should reflect the national laws and policies on response to child abuse cases. The following are some key guidance questions when developing the procedures:

- Who is required to report cases of child abuse?
- Who are the officials designated to receive such reports?
- When is the obligation to report triggered (i.e. at suspicion of abuse?)
- What information needs to be shared?
- What are the reporting regulations regarding timing and other procedures?
- How is confidentiality protected?
- What are the legal implications of not reporting?

When taking actions on behalf of children, ensure their best interest is always the primary consideration even in the context of mandatory reporting laws and policies. The child and their caregiver should also understand what is happening and why. The child can be asked a few questions relating to the subject to determine their ability to comprehend what is happening but care should be taken to avoid distressing or overburdening them with decision making that is beyond their capacity. Any contact with a child to discuss a case should be taken by specialists and under the advice of the SHEA and Safeguarding Focal Point and Global SHEA and Safeguarding Team. Children should be given a chance to respond and express their thoughts as decisions are made concerning them.

All staff and other representatives are required to report if:

- They become aware that a child 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 children.
- 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 a child. This is not a breach of this policy as the harm is not carried out by staff/representatives. However, as part of our commitment to eradicating violence and ending poverty we still have a duty to report such concerns. This must be reported to the

SHEA and Safeguarding Focal Point and Country Director, who has overall responsibility for referring this to an external agency so that this can be safely addressed.

ActionAid is committed to creating a working culture in which everyone feels safe to raise a concern. 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.

Management of complex SHEA and Safeguarding reports:

Nature of Concern	Report to	Response
Allegation about staff at a Partner Organisation	SHEA and Safeguarding Focal Point/SHEA and Safeguarding Stakeholder Panel	<p>Concerns regarding partner staff members must be reported immediately via the reporting mechanisms detailed above. If ActionAid receives a complaint about a member of staff at a partner organization, ActionAid will risk assess informing the partner with the aim of working with the partner to ensure this is responded to quickly and appropriately in line with ActionAid's policies and values.</p> <p>ActionAid will support a partner's capacity to manage a concern, for instance if the partner is engaging well but does not yet have the resources to respond. If appropriate, concerns will be managed through a joint process or by ActionAid if appropriate. If there is reason to believe that a complaint has been dealt with inappropriately or inadequately by a partner, ActionAid must consider whether they will withdraw funding or end the relationship.</p>
Allegation about staff at another organization (e.g another international aid agency)	SHEA and Safeguarding Focal Point/SHEA and Safeguarding Stakeholder Panel	<p>Concerns raised about the behaviour of staff of another international aid agency must be reported to the SHEA and Safeguarding Focal Point and Stakeholder Panel. 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 robustness or timeliness of the other organisation's response they should raise concerns to the appropriate channels in the organisation and consider</p>

		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	SHEA and Safeguarding Focal Point/SHEA and Safeguarding Stakeholder Panel	<p>Allegations that staff or other representatives have carried out a criminal activity will be assessed by the SHEA and Safeguarding Focal Point/Stakeholder Panel 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> <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. Where the external response is unable to provide this specialized service or no such service exists, then ActionAid may provide such services only as a last resort</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. For example, ActionAid will provide all necessary information, map out referral pathways as part of immediate and long term support of the survivor, and ensure the survivor is supported throughout. ActionAid will monitor the external response until it is concluded 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	Internal report (e.g to the Board) and the Global SHEA and Safeguarding Team	ActionAid staff members and representatives who disagree with actions taken must first appeal in country via established processes (e.g to the Board). 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	Global SHEA and Safeguarding Team	Concerns raised that involve staff from more than one ActionAid country 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	National Board, the AAI Board, and the Global SHEA and Safeguarding Team	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	AAI Board and the Global SHEA and Safeguarding Team	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	Global SHEA and Safeguarding Team	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/ a member of the SHEA and Safeguarding Stakeholder Panel	Country/Executive Director and the Global SHEA and Safeguarding Team	Concerns raised about a SHEA and Safeguarding Focal Point/ a member of the SHEA and Safeguarding Stakeholder Panel 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	Secretary General and the SHEA and Safeguarding Lead on the AAI Board	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 and the risk will be monitored at the AAI Board level.

9. Responding to concerns and complaints

The SHEA and Safeguarding Stakeholder Panel will oversee all concerns relating to children. They will ensure that:

- Within 24 hours the concern 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 and manage donor reporting requirements.
- Within 48 hours the SHEA and Safeguarding Stakeholder Panel meet to discuss the case.

- c) The SHEA and Safeguarding Stakeholder panel will triage all cases to assess what action can be taken by ActionAid or other external bodies. Risk assessment carried out to address any immediate security or welfare concerns, and legal guidance sought. If the concern includes a partner organization, risk assess their involvement. If the matter is best addressed by an external body (e.g a Child Protection Authority) then they will refer the case to them, and follow up on the process until it is concluded. If the actions on the case are led by another agency, the Stakeholder Panel will assess and carry out any actions that can be taken by ActionAid (e.g assessing recruitment practices, or developing an action plan to prevent risks happening in future). At all times the wellbeing of the child/young person will be paramount.
- d) Our survivor centered approach applies to our work with children and young people and ActionAid will always try to ensure that the survivor is consulted and their wishes and concerns addressed as far as possible. However, 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 and the decision will be made by the SHEA and Safeguarding Stakeholder Panel, in conjunction with the Global SHEA and Safeguarding Team. This will only be done following clear risk assessments, analysis of the age and agency of the survivor (as decisions may need to be taken on behalf of children, working with their care givers) and will always ensure that the safety and wellbeing of the survivor/complainant is paramount.
- e) There is no time limit on the activities of the SHEA and Safeguarding Stakeholder Panel. They must take action as quickly as possible to ensure they are managing risk and the rights of all involved. However, in line with our survivor centered approach, timing will depend on the needs and wishes of the survivor and so no time limit is set for this stage. The Stakeholder Panel will keep the survivor and subject of concern updated throughout, and ensure they are supported.

Concerns relating to a child

- 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. However, where external response is unable to provide this specialized service or the service is not in place, then ActionAid may provide such services only as a last resort. For concerns raised relating to child sponsorship, the Global SHEA and Safeguarding team will work with Child Sponsorship colleagues to address the concern appropriately and strengthen processes as appropriate.
- ActionAid is committed to strengthening our approach to working with external actors and will ensure that support is given by referring all cases to appropriate professionals and organisations. We will ensure that referrals are made to individuals and organisations that act in line with ActionAid's values and puts the welfare of the child as the highest priority.

What to do if you have concerns relating to a child's safety

- The first priority is the immediate safety and welfare of the child.
- Keep calm and act normally; do not say or show that you are shocked.
- Do not investigate or question the child. If a child reports abuse directly to you, only ask questions to gather enough information so that you are sure you understand the complaint (e.g. 'who, what, where, when' questions) Do not ask 'why' questions as it can make a child fear you are judging or blaming them as this could stop them from speaking further or raising a concern

- Never agree to keep a secret. If a child is in danger you will have to inform others. Staff and representatives cannot keep confidences when they involve concerns about a child. Any information offered in confidence to other ActionAid representatives relating to risks or concerns about a child should be received on the basis that it will have to be shared with the relevant person or people in authority.
 - *Please see Section 3 for more information about managing confidentiality while also reassuring the child.*
- Do not directly challenge parents, carers or teachers about your concerns.
- Record all the details that support your suspicion and report this in line with the reporting procedures detailed in this section.

For more information please see the Incident Management Flowchart (Appendix 1)

9.1 Security in SHEA and Safeguarding incident management

Recognising the inherent risk in addressing allegations of sexual exploitation and abuse, any internal responses to allegations of sexual exploitation and abuse must be carried out in line with ActionAid's security approach and *Global Staff Safety and Security Policy*. Risk assessments must be carried out in incident management processes to help mitigate risks and protect the rights and safety of all involved.

9.2 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.

9.3 False or malicious complaints

False or malicious allegations relating to child abuse are extremely rare. However, if a member of ActionAid staff 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 must be noted that if a case is not upheld that does not mean that the complaint was false, rather that there was insufficient evidence or that, even if the complaint is found not to reach the threshold for sexual harassment, it may represent harassment or sexist behavior that is contrary to AA policies and Code of Conduct.

10. Support Options

ActionAid does not have the expertise to provide professional support to child survivors of abuse or exploitation. However, ActionAid will ensure support is given by referring the cases to appropriate professionals and organisations that act in line with ActionAid's values and puts the welfare of the child as the highest priority. As appropriate, ActionAid will ensure that support is offered to those 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. Country/Executive Directors must ensure there is budget available to provide support as needed.

In line with our survivor-centred approach, support will be offered to survivors and complainants, regardless of whether a formal response is carried out (e.g. an investigation). Survivors and

complainants can choose if and when they would like to take up the support options available to them. ActionAid is committed to learning from survivors and being guided by them, where safe and appropriate to do so.

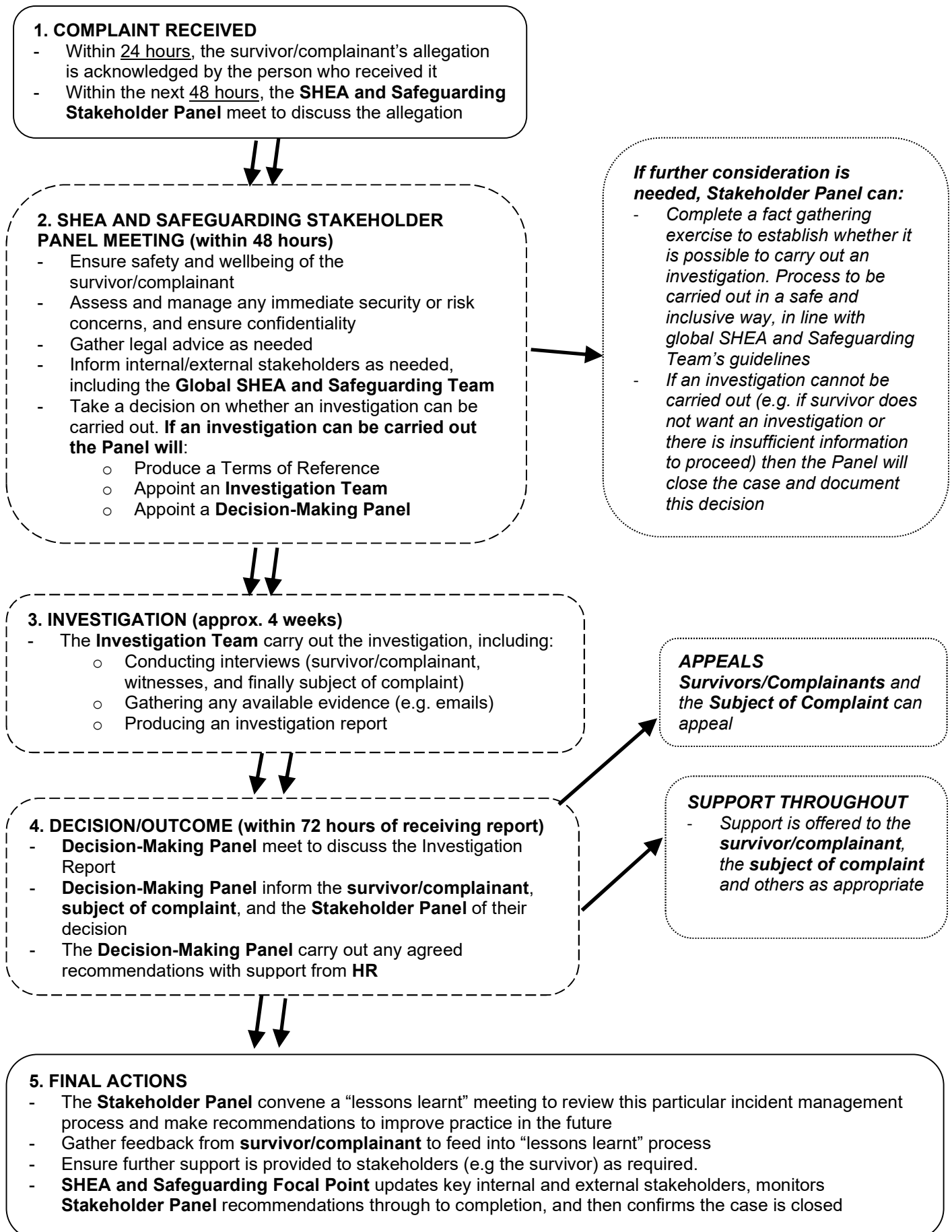
ActionAid is committed to working with local NGOs and women's rights groups to develop learning on safe, intersectional, and feminist support options and ensuring that the support options offered meet the needs of diverse survivors.

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).

11. Further Reading

- ✓ ActionAid Community-Based Complaints Mechanisms for SHEA and Safeguarding during COVID-19, 2020
- ✓ COVID-19 SHEA and Safeguarding Risk Assessments
- ✓ Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response, 2020
- ✓ ActionAid Process Map for Donor Reporting on Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding concerns (child abuse and adult at-risk abuse), 2020
- ✓ SHEA and Safeguarding and Safer Programming in ActionAid's COVID-19 Response, 2020)

Appendix 1 – Incident Management Flowchart



Appendix 2 – Indicators of child abuse

Listed below are a number of indicators of child abuse. These may vary between contexts and should be considered in relation to the expected norm. This is not exhaustive but is a guideline to help establish whether some form of child abuse or exploitation may have taken place.

If you have any questions about this, please contact the Global SHEA and Safeguarding Team on safeguarding@actionaid.org

1. Indicators of possible emotional abuse

Physical

- Persistent tiredness or lack of concentration
- Frequent psychosomatic complaints (e.g. headaches, nausea, stomach pains)

Behavioural

- Suffers from severe developmental gaps
- Symptoms of depression, anxiety, withdrawal, or aggression
- Overly compliant; too well-mannered; too neat and clean
- Copying of negative behaviour and language used at home whilst playing
- Attention-seeking and self-destructive behaviour, stealing, impulsive lying, self-destructive behaviour
- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes overly attached.
- Nervousness, frozen watchfulness, Obsessions, irrational phobias, extreme inhibition whilst playing

2. Indicators of possible physical abuse

Physical

- Unexplained bruises, cuts, burns, bites, or fractures, or other injuries especially in areas not normally exposed to falls, rough games etc

Behavioural

- Wary of adults or of a particular individual
- Violent towards other children
- Dressed inappropriately to hide bruises or other injuries
- May be extremely aggressive or extremely withdrawn
- Cannot recall how injuries occurred or gives inconsistent explanations

3. Indicators of possible sexual abuse

Physical

- Severe sleep disturbance, with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations

- symptoms of sexually transmitted diseases or infections, or urinary infections
- Unusual or excessive itching or pain in the genital, anal, or stomach area

Behavioural

- Child who is sexually provocative with adults
- Age-inappropriate sexual play through drawing, with toys alone, and with others
- Preoccupation with sexual matters; bizarre, sophisticated or unusual sexual knowledge
- Secretive comments and/or comments that allude to the behaviour of care givers

4. Indicators of possible neglect

Physical

- Under nourishment and failure to grow
- Constant hunger, stealing or gorging food
- Untreated illnesses
- Inappropriately dressed
- Extremely dirty or unbathed
- Inadequately supervised or left alone for unacceptable periods of time

Behavioural

- Demonstrates severe lack of attachment to other adults or is very demanding of affection or attention
- Poor social skills when interacting with other children and adults
- Has no understanding of basic hygiene
- Poor school attendance or performance

Appendix 3 – Content storage, distribution, and publishing

Storage

- All content should be stored and shared using the StoriesHub and ActionAid's Child Sponsorship database. For content that is not shared using these systems, remove any embedded metadata attached to a case study, photograph or video that could lead to the child's full identity and location being discovered.
- Children should be identified by their given names, so long as this does not expose a child to risk. Changes to names should be made clear. A secure record of the actual name must be maintained, but never published.
- All content concerning children is stored only on the StoriesHub, and ActionAid's Child Sponsorship Database to provide security and effective controls over access and correct levels of information and to ensure that these principles and practices are adhered to. Content not yet stored on these two systems must be carefully stored on safe servers and access is limited to only authorised staff.
- Adequate safety measures must be put in place for transporting content from the field. Such security measures must include encryption of data; ensuring laptops have strong passwords, not sharing passwords etc.
- All content gathered must be assessed for appropriateness and context before its approved for storage and sharing using StoriesHub. Do not store or share any content that is graphic and distressing, shows a child who is naked or not fully dressed or images that appear to sexualise or degrade children in any way.

Distribution and publishing

- When publishing content the basic principle is to not provide too much information e.g. family name, exact location or school name which would allow the child to be identified and located by anyone with access to our communications materials. It is also necessary to be mindful of the 'jigsaw' effect. Where separate limited amounts of information can be aggregated to reveal direct identification and location e.g. the presence of an unnamed child in a photograph captioned with the mother's family name and separately a photo of the child captioned with her first name.
- All forms of external communication whether it be media, marketing, donor engagement or social media need to adhere to the child protection policy and guidelines.
- Staff and representatives should not post photos of themselves with children linked to ActionAid's work on their personal social media accounts, if they wish to show ActionAid's work, they should repost from the official ActionAid accounts.
- Staff and representatives must not accept any friend requests from children engaged with ActionAid under any circumstances. Parents are asked to inform ActionAid immediately if it appears that a member of staff has accepted a friend request as it may be someone pretending to be associated with ActionAid.
- All content posted online should have downloads disabled.
- Publications in any media must never include a child's full name, school or precise location that could lead to the identification of a child. Location should be kept broad e.g. Amina, 13, northern Kenya.
- Do not publish pictures which include school names in background or school badges on shirts, maps, etc, that could identify child and location.
- Check that fully informed consent consistent with *Section 7.6* has been gathered before publication of case studies, photos or videos using on any channel or platform.
- Should a child have had their story collected for a specific use it should not be appropriated for a different use without seeking permission e.g. the story was collected

to show a new well in the community so their photo should not then be used as the face of a period poverty campaign.

- Never write a message on a child's behalf for a child to hold in a photograph. They should write it themselves or it should be written for them, in their own words, if they can't write and clearly state that this is the case in the caption
- Remove the GPS metadata that some cameras may record with images before using or uploading them to social media accounts (these are removed automatically when uploaded to StoriesHub so if you are using content from here it has been done for you). Otherwise Switch off the GPS or location tracking settings used on social networking sites or adjust them to make sure that children's personal details (e.g. address or location) are not revealed online. Information on removing GPS data from photos can be found here:
 - <http://fieldguide.gizmodo.com/remove-location-data-from-your-photos-before-sharing-th-1593773810>
- Consult legal opinion if a child is in anyway involved in any current or potential legal proceedings (e.g. where they are a witness or a community dispute over land) in case publication puts the child at risk or prejudices the proceedings.
- If any staff members or representatives find any content published by ActionAid that contravenes the practices of this policy, the relevant line manager must be informed immediately.

Delivering Content from a Smart Phone

- As much as possible, organizational equipment should be used to take videos or images of children when content gathering. If not possible, then smart phones may be used but agreed measures must be in place to reduce chances of abuse.
- Line managers must sign off on the use of personal mobile phones. Staff/representatives must not use personal mobile phones for content gathering without risks being identified and measures put in place to reduce risk of abuse and exploitation of children and young people.
- Collected content must be shared with the Global Secretariat communications team for editing and safeguarding before uploading on StoriesHub.
- Avoid using social media platforms to share images. Only upload images on organizational approved accounts, sites and apps e.g. OneDrive and log using your ActionAid account. Photos or videos taken using smart phones during any ActionAid activity should not be taken for personal use or posted on ActionAid staff/representatives' personal social media accounts. These should immediately be deleted from smart phones after uploading on official ActionAid sites and apps. Avoid storing data on smart phones as these can be lost, stolen or seized.
- All content posted online should have downloads disabled and GPS metadata removed from images to be used.
- When sharing content on StoriesHub, remove surnames from any shared documents other than consent forms, remove any names of schools, villages or towns that can identify a child, remove anything else in images or photographs that can identify a child's specific location.

(for reference see the ActionAid Using a Smartphone: The Simple Content Gathering Field Guide and the Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response Guidance Note, August 2020)

Appendix 4 – Permission for use of information and images

There are two ways to gather informed consent:

1. Verbal Recorded Consent: Make a recording (audio or video) of you reading this full script aloud. The recording must include the contributor agreeing to each point on the list in the box on page 2 by saying yes after you read each point.

2. Written Consent: Read the same full script aloud and ask the contributor to sign the form (page 3). You can choose whether Verbal or Written consent is most appropriate. During Covid-19 for example, it is safer to gather verbal consent. You do not need both. Contributor = anyone we need consent from = anyone featuring in a photograph, video, audio or those giving a written testimony or interview. [Instructions to the interviewer are given in grey in brackets and are not part of the script].

Option 1. Verbal Consent

Please read this script and ask the interviewee so say 'yes' or 'no' when prompted.

ActionAid International Informed Consent Script

Before we begin, I would like to ask for permission to record our conversation. I am working on behalf of ActionAid, which is an organisation working in 44 countries around the world for social justice, women's rights and equality.

ActionAid is interviewing and photographing you and your family to better understand the impacts of: [here you should discuss the topic of the interview].

By providing ActionAid with information about your situation, we can tell people what life is like here, and improve the impact of our work in communities.

With your consent, your story can inspire people to support ActionAid in many countries, raising awareness and money for our work.

ActionAid may use your story on its websites and for campaigning and fundraising. Your story may be shown on the internet, including on social media sites like Facebook or Twitter.

Your story may be printed in newspapers and magazines or broadcast on radio and TV stations.

Someone you know may see the photographs and read about your story.

I would like to show you some examples of how your photos/ interviews could be used by ActionAid.

[Here you can show examples on your phone or bring printed examples to the interview:

One pager Website: <http://www.actionaid.org/> Social media: <https://www.facebook.com/ActionAid/>

Publication: <http://www.actionaid.org/publications/> action-global-justice Media:

<http://metro.co.uk/2018/04/26/meetpeanut-butter-queen-surviveddomestic-abusebecome-business-women-7499752/>]

You may not wish to be identified for legal or personal reasons. If that is the case, we are happy to change your name or photograph you in a way that conceals your identity. We never disclose names, ages, location or any information which could put you, your family members or friends at risk. [Add any specific risks for the interviewee if they have been identified as high risk eg. human rights defenders, survivors of sexual violence].

We can stop the interview at any time if you feel uncomfortable or want a break. You have the right to retract or add anything at the end of the interview.

If you change your mind about us using your story, then you can withdraw your consent at any time, through your local ActionAid office.

The information that we collect from you will be stored safely in a digital database managed by ActionAid International.

We only update the information you give us if you contact us, or if we interview you again. [This is our privacy policy, should you need it].

This consent agreement is for a limited time of five years, after which ActionAid will need to obtain further authorisation from you to use your story.

This consent agreement is not a contract for cash, goods or services. You will not be paid for your story. Telling your story or choosing not to tell your story does not affect the support you receive from ActionAid.

I will now list the different ways your story may be used and you should say YES or NO after each example to tell me whether you agree to each different use of your information.

I give my consent for the information, quotes, film and photography taken here in this interview to be used for any of the following purposes: • To promote ActionAid's work. [Prompt interviewee to choose Yes or No]. • To promote the organisations which fund ActionAid's work. [as above]. • To promote partners of ActionAid where my story is relevant to the partnership. [they should say yes or no every time]. I give my consent for the following categories of information about me, to be used by ActionAid: • My health • My race • My ethnic origin • My religion • My sexual orientation • My political opinions • My Trade union membership • My private life and relationships • My experience of abuse and sexual violence perpetrated against me

You can contact the local ActionAid office at any time to update or withdraw your consent. [provide a contact and phone number/ email and leave a paper copy of the details using the leave behind form/ or business card]

Option 2. Written/Signed Consent Read the same script as above, and ask the interviewee to sign this completed form.

Contributor	
Name:	Signature:
Date:	Location:
<hr/>	
I give my consent for the information, quotes, film and photography taken here in this interview to be used for any of the following purposes:	
<ul style="list-style-type: none">• To promote ActionAid's work. [Prompt interviewee to choose Yes or No].• To promote the organisations which fund ActionAid's work. [as above].• To promote partners of ActionAid where my story is relevant to the partnership. [they should say yes or no every time].	
I give my consent for the following categories of information about me, to be used by ActionAid:	
<ul style="list-style-type: none">• My health• My race• My ethnic origin	<ul style="list-style-type: none">• My religion• My sexual orientation• My political opinions
<ul style="list-style-type: none">• My Trade union membership• My private life and relationships	<ul style="list-style-type: none">• My experience of abuse and sexual violence perpetrated against me
<hr/>	
Name and signature of parent/ legal guardian if anyone under 18:	
<hr/>	
Contributor's name in Latin script (if this form is completed in any other language writing system):	
<hr/>	

For staff, contractor or partner

I confirm that I have gathered informed consent using the script and followed the content gathering support guidelines provided.

Name: _____ Signature: _____

Date: _____ Location: _____

If there are protection concerns regarding this person, please describe the risks here:

For people with protection risks only:

- Please describe the person's clothes if they are being photographed anonymously so we can match the photos with the story during the editing process.
- Please suggest an appropriate alternative name that is common in this person's culture.

In very extraordinary circumstances, it may not be possible to record verbal consent or obtain written consent. Describe here if this is the case:

If working with a translator, translator to complete:

Languages translated: _____ Name and signature: _____

Date: _____

Guidance for Gathering Informed Consent

What is informed consent?

Informed consent means that someone you are interviewing or photographing fully understands how their story may be used and – most importantly – that someone they know may see or hear it. Gathering this consent is a legal requirement. Without consent, countries will not be able to use any of the content gathered. Not having consent could damage the person's and ActionAid's reputation and cost us money. If a person decides that they don't like the way their story has been used, they could sue ActionAid if no informed consent was obtained.

Who do we gather informed consent from?

ActionAid must gather informed consent from every person who appears in our content, and who we take personal details from. This applies both to people who are on their own or in a group of five or less. Personal details might include their name, age, job, photograph, story, or ActionAid's involvement in their life. We might gather our content and these personal details through interviews, photographs, videos or audio recordings. All consent needs to be given freely (in other words, without any pressure to give it) and needs to be informed (knowing how and where it will be used, including any risks). You can gather consent either by using a written consent form, or by recording verbal consent via a short audio or video clip. Either option requires you reading the script aloud, to ensure informed consent. Please ensure you read the guidelines below before gathering any content.

How do I gather informed consent?

We understand that gathering consent is not always easy. It is particularly challenging during the Covid-19 pandemic due to all the restrictions that are in place. However, it is extremely important that informed consent is gathered for legal reasons - without it, any content gathered is unusable. For the person to give informed consent, follow the script provided. NOTE: If you are gathering consent from a minor (aged 17 and under) or a vulnerable person (for example, someone with a learning disability), you should obtain consent from their parent/guardian/ carer who is over 18 – NOT their teacher, group leader or village head. Please also carefully explain everything to the child or vulnerable person in a way which is easy for them to understand.

Two types of consent are accepted

Verbal recorded consent

- The audio or video clip must include: the whole consent script being read aloud, and then the contributor stating their consent.
- Read the consent script (or use a translator to read the consent script) to the person/people you are interviewing, in a language they fully understand. Add any clarifications that are needed. If using a translator, make sure they tell you if your interviewees have any concerns or questions.

Signed consent form

- Either read the script aloud, in a language the person/people fully understands or give the form to them so they can read it themselves.
- Then ask them to sign and date the form.

You can choose whether Verbal Recorded or Written Consent is most appropriate. During Covid-19 for example, it is safer to gather verbal consent. You do not need both.

- All consent script and forms should be translated into the local language.
- Please do not collect a fingerprint as a form of consent. In very extraordinary circumstances, it may not be possible to record verbal consent or obtain written consent. If this is the case, fill in the section on the written form to explain that consent was given, and why not recorded. Non recorded consent (only if audio, video, or written consent are not possible):
- Read the script to the person or people you are gathering content from.
- Then YOU sign the form with your name, details and the date, and state that you have obtained informed consent from them. Stating why you were unable to get recorded consent.

Storing consent

All consent forms, audio recordings and videos should be securely stored on StoriesHub in the 'consent' category. State any restrictions clearly in any content you upload, for example if an interviewee does not want their content used in a specific way, such as on social media or we if cannot mention specific information about them.

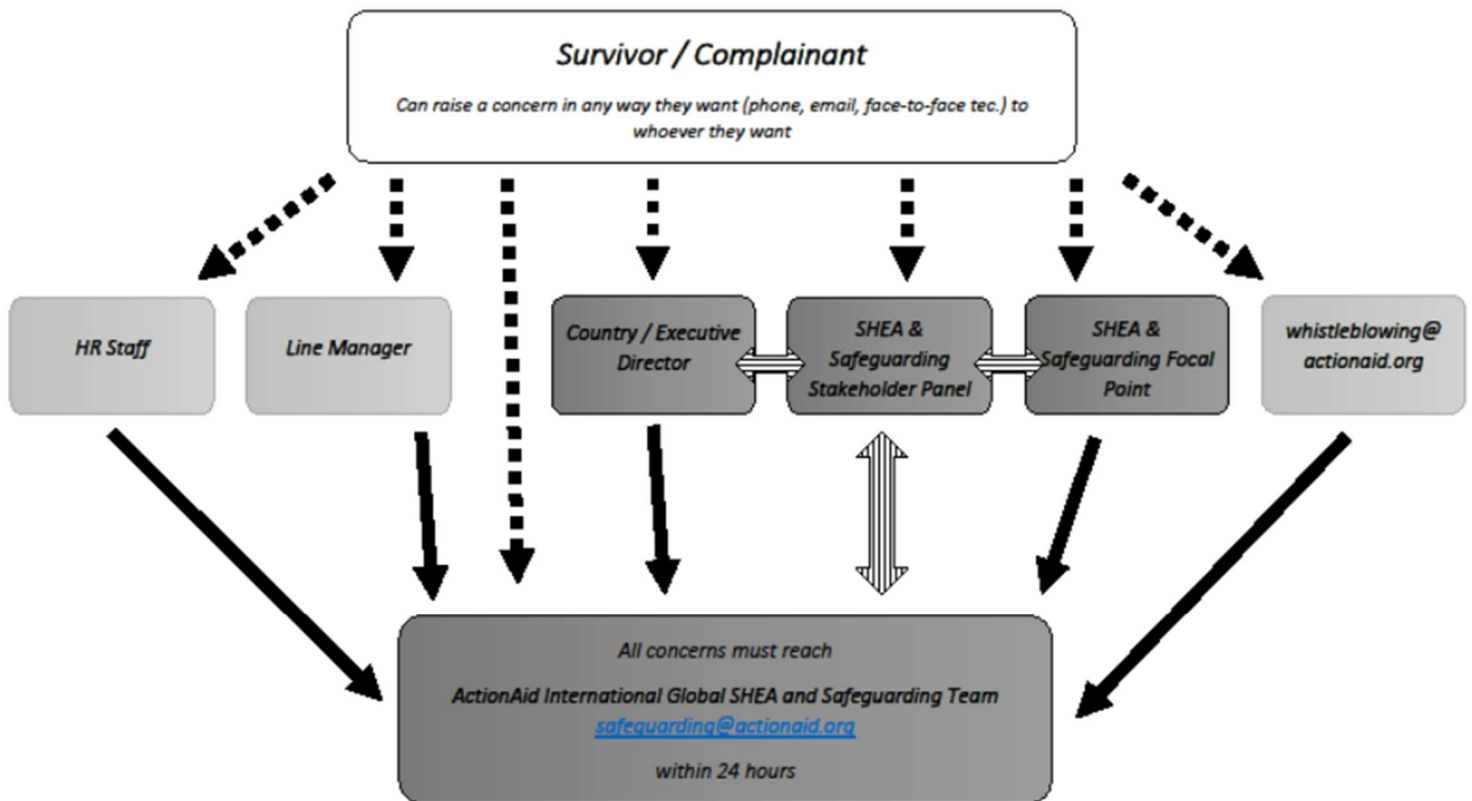
General guidance:

- The way you gather content should always prioritize the individual's or group's needs. They should be able to suggest the best place for the interview and photography to take place. Show them a selection of photos so they can see what you are capturing. Research local customs and be mindful of ActionAid's Safeguarding policies.
- Contributor's name, locations and spellings: Check all of these details with your photographer, AA staff member or translator on the day of the content gathering, to avoid any confusion.
- Anonymity: Individuals may wish not to be identified. If that is the case, we need to change names and photograph/video people in a way that conceals their identity (for example, concealing their eyes). Individuals can also give an interview and share their story without being photographed at all. You should reassure people that we never disclose any personal information which could put them at risk (such as names, locations etc.) without their consent. Refer to ActionAid's image guidelines for examples of anonymous photography and advice on when to protect identities.
- Take extra care when anonymizing a story during a video interview. Make sure the information being shared could not be added together and lead to that person being identified. With a written interview, it is easier to edit out sensitive information, but with video interviews it's much harder or impossible.
- Child protection: Any information which will identify the location of a child must not be made public. Only first names of children will be published and locations will not be shared. Before collecting any content with children please read the child safeguarding policy.
- Survivors of sexual violence and vulnerable adults: A risk assessment should be conducted prior to interviewing. Based on the assessment, you should then decide what information can be shared and

what support is provided to the contributor.

- **Public buildings:** To photograph public buildings such as schools or hospitals, you may need to gain the permission of a local authority before a content-gathering trip starts. Build this into your planning and timeframes.
- **Public events or gatherings:** You can take pictures of crowds, but when there is a group of five or less people, consent should be gathered. If people are entering a public space or an event hosted by ActionAid, put up signs at an entrance that are clearly visible and in the local language. Audio public announcements should also be made in areas with low literacy. The message should explain that filming is taking place, organized by ActionAid and advise that anyone entering may be filmed and may appear in the background of the film. State that anyone can let you know if they don't want to be filmed. You can also direct them to the privacy policy on your country's ActionAid website, in places where you know there is easy access to the internet.
- **Communal spaces:** For images of groups in communal spaces, programme staff/representatives should have sufficient time to forewarn a community that filming is happening on a certain date and time. This will allow people to opt out from attending or to let staff/representatives know that they do not want be photographed/ videoed.
- **Emergencies:** During or in the immediate aftermath of an emergency (for example, a natural disaster) we should continue to photograph people with dignity, and never photograph people in distress or in danger. We don't need consent for shots which contain more than five people or when people are simply featured in passing (such as in the immediate aftermath of a disaster). Consent is required once you enter their refuge or gather personal data, such as names, quotes, or any other personal information.
- **Additional legislation:** ActionAid countries can alter the consent form if they want to add additional local legislation. However, all the information in the script and on this form must be included. Translate the entire form and script into local languages and print some examples of content usage to show to the contributor.
- **Storing consent:** All consent (audio, video, written consent, including digital and paper copies of consent forms) must be securely stored on StoriesHub, where it will be backed up and adheres to EU data protection laws. Additionally, if secure back-ups are stored on country servers these need to adhere to country data protection laws

Appendix 5: Reporting Flowchart



- The **Survivor/Complainant** can choose how to raise their concern.
- **Everybody** else *must* ensure that the concern is reported to the Global SHEA and Safeguarding Team and SHEA and Safeguarding Focal Point as soon as possible (within 24 hours).
- The country SHEA and Safeguarding Stakeholder Panel will respond with the support of the Global SHEA Safeguarding Team.



Appendix 6: Child Risk Assessment template

This form is to be completed by staff/representatives trained/experienced in carrying out risk assessments

Date of risk assessment	
Name of project	
Name of partner	
Donor(s)	
Name of AA reporter	
Name of partner reporter	

		Impact		
		L	M	H
Likelihood	H-3	M	H	H
	M-2	L	M	H
	L-1	L	L	M

[illegible]