

# Our Safeguarding Policy

## 1.Principles

ActionAid UK (AAUK) is committed to the following principles when dealing with issues of safeguarding:

- **Commitment to safety, health and welfare:** of all involved, including survivors of safeguarding violations, staff members against whom complaints are made, and staff involved in managing and investigating complaints
- **Professionalism:** adhering to relevant policy and standards at all times
- **Respect** for all involved: all stakeholders shall be dealt with fairly and professionally, including the person against whom complaint has been made
- **Responsiveness:** we will take complaints seriously and respond to them within a reasonable time, to give confidence to those affected
- **Working in partnership:** with other AA members and AAI, partner organisations, referral agencies and other stakeholders as appropriate
- **Adherence to the law:** AAUK works in compliance with UK law, and the law of countries where it operates
- **Confidentiality:** information relating to safeguarding is kept securely and shared with a minimum number of staff, on a need-to-know basis only.

## 2.Purpose

The purpose of this policy is to protect children and vulnerable adults from any harm that may be caused due to their coming into contact with AAUK. It is also to inform staff, contractors and freelancers of their contractual and moral responsibilities to safeguard children, young people, and vulnerable adults in all areas of ActionAid's work. This includes harm arising from:

- The conduct of AAUK staff or AAUK Associated Personnel; and
- The design and implementation of AAUK-funded programmes and activities.

This policy does not cover:

- Sexual harassment in the workplace (this is covered by AAUK's Harassment Policy); and

- Safeguarding concerns in the wider community not perpetrated by AA staff or Associated Personnel.

This policy should be used in conjunction with AAUK's Safeguarding Protocol which provides further detail in implementing safeguarding policy in AAUK's areas of operation.

### 3. What is safeguarding?

Safeguarding is the responsibility that organisations have to ensure their staff, operations, and programmes do no harm to children and vulnerable adults, and that they do not expose them to the risk of harm and abuse. Further definitions relating to safeguarding are provided in the glossary below.

### 4. Scope

All staff contracted by AAUK and AAUK Associated Personnel whilst engaged with work or visits related to AAUK.

### 5. Policy Statement

AAUK is committed to undertaking all its work in a manner which does not put children or vulnerable people at risk. We have a zero-tolerance approach to anyone who harms children or vulnerable adults, or exposes them to the risk of harm. Breach of this policy will result in disciplinary action being taken in accordance with the AAUK Disciplinary and Capability Policy and Procedure, up to and including summary dismissal for gross misconduct. AAUK staff and Associated Personnel must not:

- Engage in sexual activity with anyone under the age of 18;
- Exchange money, employment, goods, or services for sexual favours as when travelling on behalf of ActionAid you are an ambassador for ActionAid. As an organisation we believe that this is an abuse of power contrary to AAUK's policies and values;
- Sexually abuse or exploit children or vulnerable adults;
- Engage in any form of sexual relationship with beneficiaries of assistance<sup>1</sup>, since they are based on inherently unequal power dynamics;
- Knowingly engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking;
- Physically assault a child or vulnerable adult;
- Emotionally or psychologically abuse a child or vulnerable adult;
- Put a child or vulnerable adult at risk as a result of ActionAid's activities, either through individual action, inaction or programme design and implementation. This includes the way in which we gather and communicate information about individuals in our programmes

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<sup>1</sup> i.e. Rights Holders who directly receive goods or services from an ActionAid-funded programme- "beneficiaries of assistance" is the correct legal terminology. implementation.

AAUK staff and AAUK Associated Personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an AAUK/AAI staff member or AAUK/AAI Associated Personnel via established reporting mechanisms.

AAUK will:

- Design and undertake all its programmes and activities (including but not limited to emergency response, research and content-gathering) in a way that protects children and vulnerable adults from risk of physical or psychological harm that may arise from their coming into contact with AAUK.
- Seek assurance that AAI and AA member countries in receipt of funding from AAUK have in place robust safeguarding policies and procedures, and are acting in accordance with those policies.
- Implement stringent safeguarding procedures when recruiting, managing and deploying AAUK staff and AAUK Associated Personnel.
- Comply with UK legislation in any activities involving contact with children and vulnerable adults taking place in the UK.

## 6.Reporting

AAUK staff members who have a complaint or concern relating to safeguarding must report it immediately to the Deputy Director of People and Culture. If the staff member does not feel comfortable reporting to the Deputy Director of People and Culture (for example if that person is implicated in the concern) they may report to any other appropriate senior AAUK staff member. Any staff reporting concerns or complaints will be protected by the AAI Whistleblowing Policy. Staff are also required to raise any issues from their interaction with child sponsors that cause them concern<sup>2</sup>. These concerns should be raised using the procedures outlined above.

If a supporter and/or sponsor themselves has a safeguarding complaint or concern, these should be raised through AAUK's external Complaints Procedures (<https://www.actionaid.org.uk/about-us/complaints-procedure>). AAUK will also accept complaints from external sources such as members of the public, partners and official bodies. These can be made through AAUK's external Complaints Procedures as above. AAUK will require all AA member countries in receipt of UK funding to report any safeguarding complaints or concerns to us, so that we can follow up on these and gain assurance that they have been dealt with appropriately.

## 7.Visits to other ActionAid Federation member offices or programmes

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<sup>2</sup> ). For example, requests from supporters that contravene AAUK's Safeguarding Policy. Staff will not be expected to recognise safeguarding 'red flags'. However, they are required to raise anything they find concerning, for a management decision on whether/how to proceed.

This Policy will still apply in the event that AAUK staff members or AAUK Associated Personnel visit another ActionAid member office or programme. Staff will also be expected to follow any additional restrictions on conduct specific to that location, for example cultural or safety requirements. Staff are expected to make themselves aware of guidelines and expectations relating to conduct when visiting a member country. Concerns or complaints relating to safeguarding should be reported in accordance with this policy on return from the overseas visit (if not during). In addition, where the incident occurred in another jurisdiction than the UK, the AAUK Staff or Associated Personnel should report it to staff of the AA member country, in accordance with that member's policy, or the ActionAid International Child Protection Policy. If for any reason they do not feel able to do this, they may ask that AAUK report it to the member country on their behalf.

If a complaint or concern relates to AAI Staff or AAI Associated Personnel, AAUK cannot take action itself since it has no direct relationship with the individuals concerned. Instead, AAUK will make a report to the Global Secretariat and to the relevant member country, whose role it is to investigate the matter and take any necessary steps. AAUK will robustly follow up on safeguarding concerns reported to other AA countries in accordance, to gain assurance that they have been dealt with appropriately. If the Board of Trustees is not satisfied that a complaint has been adequately addressed, it will consider whether to cease funding the relevant AA country.

If a complaint or concern does not relate to AAUK/AAI Staff or AAUK/AAI Associated Personnel but to a third party, AAUK will raise it with the GS or the relevant AA member country to take forward as they see fit, for example by making a police report. We will not take follow-up actions, since we have no contractual or employment relationship with third parties and therefore do not have standing or jurisdiction to take action against them. However, any safeguarding violations witnessed by AAUK staff (including partners and volunteers) must ALWAYS be reported to the Deputy Director of People and Culture of AAUK in the first instance.

## 8.Accountability

Accountability for safeguarding sits with the Board of Trustees. Day-to-day oversight is delegated to the Chief Executive. The Deputy Director of People and Culture shall be the designated Safeguarding Officer for AAUK. Details of safeguarding reports shall be reported to Trustees. The Board will receive regular updates on progress in investigating such reports. The Trustees will appoint one of their membership (who should also be a member of PFAC) to act as Board Safeguarding Lead, with responsibility on behalf of the Board for oversight of safeguarding. Safeguarding incidents will be reported promptly to the Charity Commission in accordance with its Serious Incidents guidance, and to donors as required under grant agreements.

## 9.Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

## 10.Associated policies

AAUK Safeguarding Protocol

AAI Child Protection Policy  
AAUK Harassment Policy  
AAI Whistleblowing Policy  
Treating Donors Fairly: Protecting individuals in vulnerable circumstances, fundraising and direct marketing policy.  
AAUK Content-Gathering Standards  
AAUK Disciplinary and Grievance Policy and Procedure

## 1.1. Glossary of Terms

### AAUK Associated Personnel

Anyone who comes into contact with a child or vulnerable adult as a result of AAUK's work, but who is not employed by AAUK, including but not limited to: consultants; volunteers; contractors; freelancers, programme visitors including journalists, celebrities, and politicians; and supporters including child sponsors.

### AAI Staff Member

Anyone who is directly employed by AAI (ie. is a member of the Global Secretariat) or by an ActionAid member country.

### AAI Associated Personnel

Anyone who comes into contact with a child or vulnerable adult as a result of the work of AAI, the Global Secretariat or an ActionAid member country, but who is not employed by them, including but not limited to: the staff of implementing partners, consultants; volunteers; contractors; programme visitors including journalists, celebrities, and politicians; and supporters including child sponsors.

### Child

A person below the age of 18 -UN Convention on the Rights of the Child.

### Harm

Psychological, physical and any other infringement of an individual's rights.

### Non-Associated Personnel

People not employed directly through ActionAid or its partner organisations and contractors.

### Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, interrogation, excessive pressure to 'perform' or pose for cameras, excessive repeat interviews around emotionally disturbing experiences, and isolation.

### Safeguarding

Safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children and vulnerable adults, and that is that they do not expose them to the risk of harm and abuse.

*-Keeping Children Safe (adapted)*

### Sexual abuse

The term "sexual abuse" means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

*-UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*

### Sexual exploitation

The term “sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

*-UN Secretary-General’s Bulletin on Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*

### Survivor

A person who has been abused or exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive.

### Vulnerable adult

A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

*-UK Government Department of Health (abridged)*

Note that due to issues of poverty, marginalisation and relative lack of power, most people we work with in international programmes can be classed as vulnerable. See also the definition of vulnerable specific to supporters in AA UK’s Fundraising and Marketing Compliance Handbook.