

Child Safeguarding Policy

Policy for all staff and representatives

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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 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. 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 working with complainants and survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.

ActionAid views any form of sexual violence as a gross violation of human rights. 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.

We recognise that all forms of Sexual Harassment, Exploitation, and Abuse and other Safeguarding concerns, including our broader definitions of child abuse, are rooted in an imbalance of power, particularly gendered and sexualised abuses of power. Because of the power imbalances inherent in the international aid sector, and within the wider social norms and structures in which we work, we have a duty to prevent and respond robustly to allegations of sexual exploitation and abuse. We recognise that when individuals in our sector carry out sexual exploitation and abuse towards those, we have a duty to protect this inflicts harm and breaches human rights, breaks the trust placed in our sector, and jeopardises the credibility of all international aid organisations.

We recognise that gendered forms of sexual violence disproportionately affect women and girls, and our work recognises the impact on boys, men, transgender communities and gender non-binary people. We are committed to working with marginalised and oppressed groups, recognising the impact of sexual violence on people living in poverty and people of different ethnicities, religions, race, class and abilities. We will listen to and learn from them and work to ensure that our SHEA and Safeguarding approach supports the work they do to promote their rights and live lives with dignity.

1.1 Purpose

We recognise that as a large international federation, those working with ActionAid have increased power and privilege. We are committed to safeguarding all people who come into contact with ActionAid from abuse of that power and privilege.

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 1989 ¹ and the Universal Declaration of Human Rights 1948 ². 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.

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, discrimination and harm.
- 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. 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

¹ <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

² <http://www.un.org/en/universal-declaration-human-rights/>

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 abusive behaviours carried out between staff and other representatives (addressed through the *Sexual Harassment, Exploitation, and Abuse at Work policy*), abusive behaviour carried out towards children (addressed through this policy), and abusive behaviour carried out towards rights holders and communities, including adults at-risk (addressed through the *Protection from Sexual Exploitation and Abuse policy*).

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

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 at national office levels will include all elements of this policy and may only differ to ensure alignment with national legislation. Should this policy demand a higher standard than the local laws then this policy will prevail.

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

ActionAid Directors/International Leadership Team and International Board hold overall accountability for this policy and its implementation. They are responsible for ensuring the policy is reviewed and updated **every two years**.

Adherence to this policy will be reviewed through ActionAid's internal auditing mechanisms. Updates to the policy will be recommended through the Global SHEA and Safeguarding Lead to the International Leadership Team (ILT) who will seek approval from the International Board. In the case of substantive changes to this policy, the International Board will seek approval from the General Assembly.

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

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>³, 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,

³ <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

	<p>hitting, and slapping them.</p> <ul style="list-style-type: none"> ○ <u>Sexual</u> abuse is defined as any sexual activity, or actual or threatened physical intrusion of a sexual nature, with someone under the age of consent or under 18, whichever is greater, is considered sexual abuse. ○ <u>Psychological</u> abuse can include, especially in relation to children, threats of harm or abandonment, deprivation of contact, humiliation, blaming, intimidation, coercion, harassment, verbal abuse, and isolation. ○ <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"> - “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.
Sexual exploitation	<ul style="list-style-type: none"> - “any actual or attempted abuse of power or trust for sexual purposes, including, but not limited to, profiting commercially, monetarily, socially, or politically from the sexual exploitation of another”⁴ <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 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

⁴ <http://pseataaskforce.org/en/overview>

	<p>sexual violence since the children, and particularly girls, involved are unable to give or withhold their consent.</p> <ul style="list-style-type: none"> ○ 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 specific children who are suffering or likely to suffer significant harm. This includes procedures which detail how to respond to concerns about a child. <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 organisation has failed to meet a stated commitment that is intended to keep them safe from harm. <ul style="list-style-type: none"> o 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 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 organisational values and goals.
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.

	<ul style="list-style-type: none"> ○ 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"> ○ Related terms include human trafficking, covering coercion and recruitment under false pretences, 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 organisations 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 organisation designated to receive concerns and complaints of cases of sexual abuse, exploitation, and harassment. <ul style="list-style-type: none"> ○ 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"> ○ This is not an exhaustive list and covers anyone who is a representative of ActionAid
Survivor	<ul style="list-style-type: none"> - "...a person who has experienced sexual abuse, exploitation, or harassment. <ul style="list-style-type: none"> ○ 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-centred approach as it emphasises the power of the individual, which the term 'victim' can remove, and their agency. However, it is important that those affected by sexual abuse and exploitation can choose the term they prefer

Survivor-centred approach	<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"> o 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"> o 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. o 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"> - Persons between the ages of 15 and 24 years...Within the category of “youth” and “young people”, it is also important to distinguish between teenagers (13-19) and young adults (20-24), since the psychological and health problems they face may differ.

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 organisation itself. Maintaining confidentiality around people’s personal data and information is particularly important when managing issues relating to sexual harassment, exploitation and abuse.

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 guidance on retaining data on incident management that is issued by the Global SHEA and Safeguarding Team.

4. Roles and Responsibilities

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. 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. *More details can be found in Section 9.*

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

Staff must always:

- Ensure their behaviour is based on ActionAid's values, adheres to this policy and ActionAid's Code of Conduct, and always upholds and promotes the rights and welfare of children.
- Promote and raise awareness of this policy to everyone they come into contact with in their work, with a particular focus on the children, parents, and communities they work with.
- Ensure they are aware of their SHEA and Safeguarding Focal Point who is responsible for advising on and mitigating risk in line with this policy.
- Report any suspicions, concerns, or behaviours that breach this policy to the appropriate person(s). This includes (but is not limited to) any suspicions or incidents of child abuse carried out by staff, other ActionAid representatives, partners, community members and others. To ensure the rights of all, confidentiality must be maintained, and concerns should not be discussed with colleagues who are not involved in an incident management process *More details on reporting can be found in Section 9, and more details on confidentiality can be found in Section 3.* Ensure that the rights of children are central to any activities carried out in their area of work. For example, carrying out safeguarding risk assessments, ensuring consent is given when taking any images of children.

Staff must never:

- Act in ways that may be or be perceived to be abusive or exploitative (physically, emotionally, neglectfully, or sexually) towards children.
- Have sexual intercourse or participate in any form of sexual activity with any person under 18 years old or under the local age of sexual consent (whichever is higher). Mistaken belief in the age of the child is not a defence.
- Abuse their position of power to withhold professional assistance or give preferential treatment to children or behave in any way that discriminates against particular children e.g. children whose parents are sex workers, children with disabilities).
- Use physical punishment/discipline towards children (e.g. hitting, corporal punishment).

- Use any form of technology (e.g. computers, mobile phones, digital cameras) to exploit, harass or bully children or to access, view, create, download or distribute indecent images of children (e.g. pornographic images of children).
- Fail to disclose any convictions or child related investigations that they are subject to or have been subject to.
- Fail to report concerns relating to children.
- Investigate a suspicion or allegation of child abuse unless tasked to undertake this by a relevant authority.
- Condone or participate in behaviour towards children which is illegal, unsafe, harmful or abusive in any way or condone or participate in any child related activity which is illegal, exploitative, unsafe or abusive.
- Make children run errands for financial gain or otherwise, or use them to solicit support.
- Use language towards children that is inappropriate, harassing, abusive, sexually provocative or that is intended to shame, humiliate or emotionally abuse.
- Disempower children: staff should discuss their rights with them, what is acceptable and unacceptable behaviour towards them, and what they can do if they encounter a problem.
- Promote any form of child labour or recruit children for any labour which is inappropriate to their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at risk of injury.
- Do things for children of a personal nature that they can do for themselves (e.g. dressing, toileting, writing letters in their own words on behalf of children).
- Seek to make contact or spend time with any child who they come into contact with as part of their work, except as part of the designated activities set out in their role. For example, a staff member or other representative should not visit the home of a child alone or invite unaccompanied children into their own accommodation, if that child is known to them through their work with ActionAid.
- Take children to their home or sleep in the same room or bed as a child, when they have come into contact with these children through their work with ActionAid.
- Raise malicious complaints or use the policy for purposes other than what it is intended for.

4.1 Country/Executive Directors

Country/Executive Directors **must always**:

- Create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Be aware of the local and international laws and best practice applying to children, ensuring that all activities reflect these and staff members are made aware of them.
- Ensure a SHEA and Safeguarding Focal Point is in place, having undergone a selection process, who will raise awareness of SHEA and Safeguarding and act as a reporting point for suspicions, concerns, and complaints.
- Ensure adequate funding is in place to support SHEA and Safeguarding activities in their country (e.g. funding to ensure that all staff receive annual training).
- Ensure that the SHEA and Safeguarding Focal Point raises all concerns and complaints to the Global SHEA and Safeguarding Team, within 24 hours where possible.
- Work with SHEA and Safeguarding Stakeholder Panel to respond robustly when any concerns relating to child abuse is raised. Ensure that procedures for reporting and investigating suspected cases of abuse and exploitation of children are followed and ensuring they are in line with this policy and local laws. Including reporting to appropriate authorities for investigation and follow up.
- Ensure that the relevant disciplinary procedures are implemented for staff members who have violated this policy.

- Ensure all staff members are trained on child and human rights, how to recognise different forms of abuse and exploitation, and how to raise concerns through the appropriate channels.
- Set a positive example both on and off duty.

4.2 Line Managers

Line Managers must always:

- Create a safe environment in their area of responsibility and directly with the staff they manage, to ensure that staff and others feel able to raise concerns without fear of retribution.
- Ensure staff members in their line of authority receive an induction on this policy and that any concerns raised about staff in the line of management are addressed through appropriate means (e.g. investigation, performance management).
- Ensure that staff members are aware of their responsibilities and accountability for the welfare of children during ActionAid activities.
- Ensure that staff members are aware of their responsibilities for reporting and the procedures for doing so.
- Ensure that all activities are carried out in a way which seeks to minimise the risk to children (e.g. through carrying out routine risk assessments).
- When managing a recruitment, work with HR to ensure that appropriate measures are put in place to prevent individuals who may harm others from entering ActionAid (e.g. through safer recruitment processes).
- Ensure that poor practice or potentially abusive behaviour towards children by ActionAid or partner staff members does not go unchallenged.
- Ensure that this policy is included as part of any partnership agreement or memorandum of understanding (MoU) with ActionAid partners.
- Set a positive example both on and off duty.

4.3 SHEA and Safeguarding Focal Points

SHEA and Safeguarding Focal Points **must always:**

- Work with others to create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.
- Ensure that all inductions include a discussion of this policy.
- Deliver training to all staff on this policy and other policies that fall within the SHEA and other Safeguarding concerns remit.
- Work with others to ensure that the values, commitments, and procedures set forth in this policy are embedded throughout all ActionAid's programmes and activities, and those of our partners.
- Ensure that they raise all concerns and complaints relating to SHEA and Safeguarding to the Global SHEA and Safeguarding Team.
- Work with the SHEA and Safeguarding Stakeholder Panel to address concerns relating to children and ensure incident management is carried out in line with ActionAid's SHEA and Safeguarding approach.
- Set a positive example both on and off duty.

4.4 Human Resources

Human Resources **must always:**

- Work with others to create a safe environment where staff and others feel able to raise concerns without fear of retribution.
- Work with the SHEA and Safeguarding Focal Point to ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible to all members of staff.
- Work with the SHEA and Safeguarding Focal Point to ensure that all inductions include a discussion of this policy.
- Ensure that the values, commitments, and procedures set forth in this policy are embedded throughout the employee life cycle (including safer recruitment, performance management, and exit).
- Work with the SHEA and Safeguarding Stakeholder Panel to address any concerns relating to child abuse by providing strong employment law and employee relations advice, and ensuring that all relevant ActionAid policies and processes are followed correctly throughout the incident management process.
- Set a positive example both on and off duty.

5. Working with partners

- 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. If ActionAid receives a complaint about a member of staff at a partner organisation, ActionAid will work with the partner to ensure this is responded to quickly and appropriately. 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.

6. Safer recruitment and employee lifecycle

In line with best practice, stringent recruitment processes will be put in place 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 will 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 misconduct/disciplinary proceedings is shared with the prospective employer in line with 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.

6.1 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.

6.2 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.

7. 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 recognises 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 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.

- 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:
 - Creating separate spaces for 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 (including drivers, partners etc) awareness of risks, ensuring services are safe and accessible etc.).
- 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. 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 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
- **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.

7.1 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 5 for further information.*

7.2 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. Staff 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 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 can 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 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.

Alongside developing complaints mechanisms, staff 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.

7.3 Monitoring and Evaluation

As part of embedding SHEA and Safeguarding into all programme design and activities, staff 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.

7.4 Safeguarding and information technology

Technological development has increased the possibilities for online exploitation 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 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 must ensure that children know how to use them safely 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 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.

7.5 Programming with young people

When carrying out programmes with young people, all activities should be designed to promote the empowerment of young people 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.

It is important that young people have the opportunity to participate in risk assessments concerning any activities in which they will be involved. In such risk assessments, young people should be encouraged to discuss the social, cultural and political context as well as the individual situation of the young people 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 consent of a parent/guardian must be obtained before any action is carried out. Even when consent is obtained from parents/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 youth are informed about their rights and how to raise concerns. As a preventative measure, when working with youth include content on safe/unsafe touch, appropriate and inappropriate behaviours, consent, and how about spotting and reporting signs of abuse. Ensure that staff and all representatives are informed that ActionAid has raised awareness with youth about consent and appropriate behaviours so that they are aware that youth are encouraged to report.

7.6 Content gathering

ActionAid's duty of care towards children 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 – unless in carefully considered contexts the child and 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.

The following are practices that staff members 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.
- The content gathering must always be a positive experience for the child, providing a potential for learning and enjoyment.
- Ensure full parental or 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 the 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 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 are heads of household or already married or parents before the age of 18, the child'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 erotic 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. 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.

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

7.7 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.

8. Fundraising

8.1 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 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), and encourage parental or care-giver participation,
- All staff members 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 must take time to explain to a child when their sponsor stops their support or withdraws out of the sponsorship programme
- The consent of the child and parent/guardian must be taken in line with agreed standards in *Section 7.6* and using the consent form (see *Appendix 4*).

8.2 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.
- 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.

9. Reporting procedures

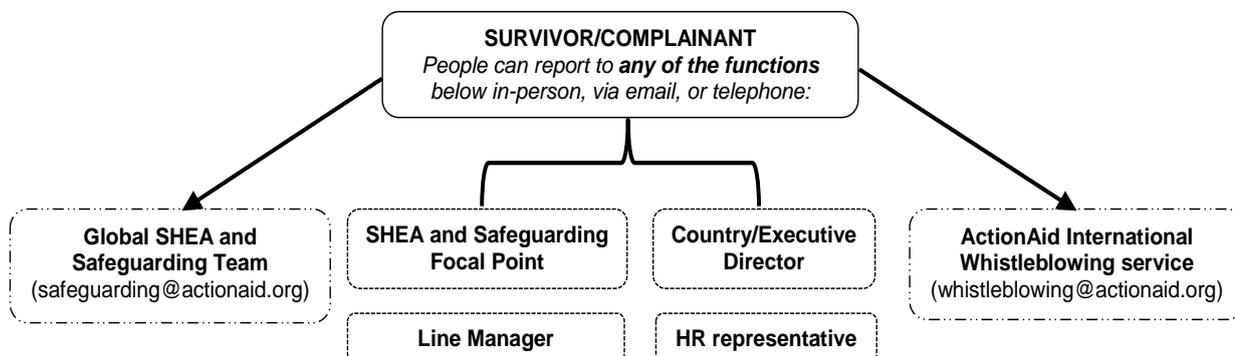
- If any ActionAid staff or other representatives have concerns that a staff member or other representative has been or it at risk of being abused, exploited, or harmed in any way they must report this immediately.
- Individuals do not have to report their own experience of sexual harassment, exploitation, or abuse, in line with ActionAid’s survivor-centred approach.

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

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

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

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



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 agreed requirements.

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. 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, following clear risk assessments and the safety and wellbeing of the survivor/complainant will be paramount.

All staff and other representatives are required to report if:

- A child or other representative alleges that they or another person is experiencing or at risk of experiencing sexual exploitation or abuse - whether carried out by ActionAid staff and representatives, or others.
- A staff member or other representative suspects that someone connected to ActionAid is or may be about to carry out sexual exploitation and abuse towards 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.

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	Response
Allegation about staff at a Partner Organisation	Concerns about staff at a Partner Organisation must be reported to the SHEA and Safeguarding Focal Point. They will report to the designated person in the partner and work with the partner to ensure the matter is addressed swiftly and appropriately. This may be through the partner's internal process or through a joint process agreed by ActionAid and the partner. If ActionAid has concerns that a complaint has been dealt with inappropriately or inadequately by a partner, ActionAid should raise concerns to the appropriate channels in the partner organisation and if these concerns are not addressed they must consider whether they will withdraw funding or end the relationship.
Allegation about staff at another international aid agency	Concerns raised about the behaviour of staff of another international aid agency must be reported to the SHEA and Safeguarding Focal Point. They will report to the designated person in the other organisation to ensure the matter is addressed. This may be through the other organisation's internal process or through a joint process agreed by ActionAid and the organisation. If ActionAid has concerns about the robustness or timeliness of the other organisation's response they should raise concerns to the

	<p>appropriate channels in the organisation and consider termination of engagement if no action is taken.</p>
<p>Allegation relating to criminal activity and/or relating to a child where others have a remit to investigate</p>	<p>Allegations that staff or other representatives have carried out a criminal activity will be assessed by the SHEA and Safeguarding Focal Point and the Global SHEA and Safeguarding Team. They will assess on a case by case basis if there are any risks involved in sharing to the police or other external bodies (e.g. if there are concerns that informing the police or others would put the survivor/complainant at risk).</p> <p>ActionAid is not a child protection agency and does not have the expertise required to carry out investigations of child abuse itself. This will be carried out by external experts brought in specifically for this purpose.</p> <p>For allegations in which external bodies (e.g. police) rather than ActionAid have a remit to investigate ActionAid will support the external process. ActionAid will monitor the external response to ensure that as far as possible it is carried out in line with ActionAid's values, and using ActionAid's advocacy role to promote change where needed.</p>
<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</p>	<p>ActionAid staff members and representatives who disagree with actions taken must first appeal in country. If they are dissatisfied with the response they receive to their appeal, they can make a second and final appeal to the Global SHEA and Safeguarding Team, who will work with the AAI Board to review the case. They can repeal the decision made by the ActionAid country if they find in favour of the staff member or other representative making the appeal.</p>
<p>Allegation raised by staff member or representative from one ActionAid country against a staff member or representative from another ActionAid country</p>	<p>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.</p>
<p>Allegation raised against a Country/Executive Director</p>	<p>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.</p>
<p>Allegation raised against anyone in the International Leadership Team (ILT) or the Secretary General</p>	<p>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</p>

	be monitored at the AAI Board level.
Allegation raised against an ActionAid Board Member	Concerns raised about a Board Member must be raised to the Global SHEA and Safeguarding Team. If the allegation relates to a National Board Member then the AAI Board and the Global SHEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the National Board as appropriate. The risk will be monitored at the AAI Board level. If the allegation relates to an International Board Member then the Global SHEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the International Board and the Secretary General as appropriate. In both cases if a complaint is upheld, an assessment will be made on whether it is appropriate for the Board member to continue to serve on the Board.
Allegation about a SHEA and Safeguarding Focal Point	Concerns raised about SHEA and Safeguarding Focal Points must be reported to the Country/Executive Director and to the Global SHEA and Safeguarding Team who will take a joint decision on how to respond to the allegation and what incident management response is appropriate. The risk will be monitored at the AAI Board level.
Allegation about anyone in the Global SHEA and Safeguarding Team	Concerns raised about anyone in the Global SHEA and Safeguarding Team must be reported to the Secretary General and the SHEA and Safeguarding Lead on the AAI Board. They will ensure that appropriate action is taken and the risk will be monitored at the AAI Board level.

10. Responding to concerns and complaints

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.
- ActionAid 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 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)

10.1 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.

10.2 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 behaviour that is contrary to AA policies and Code of Conduct.

11. 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.

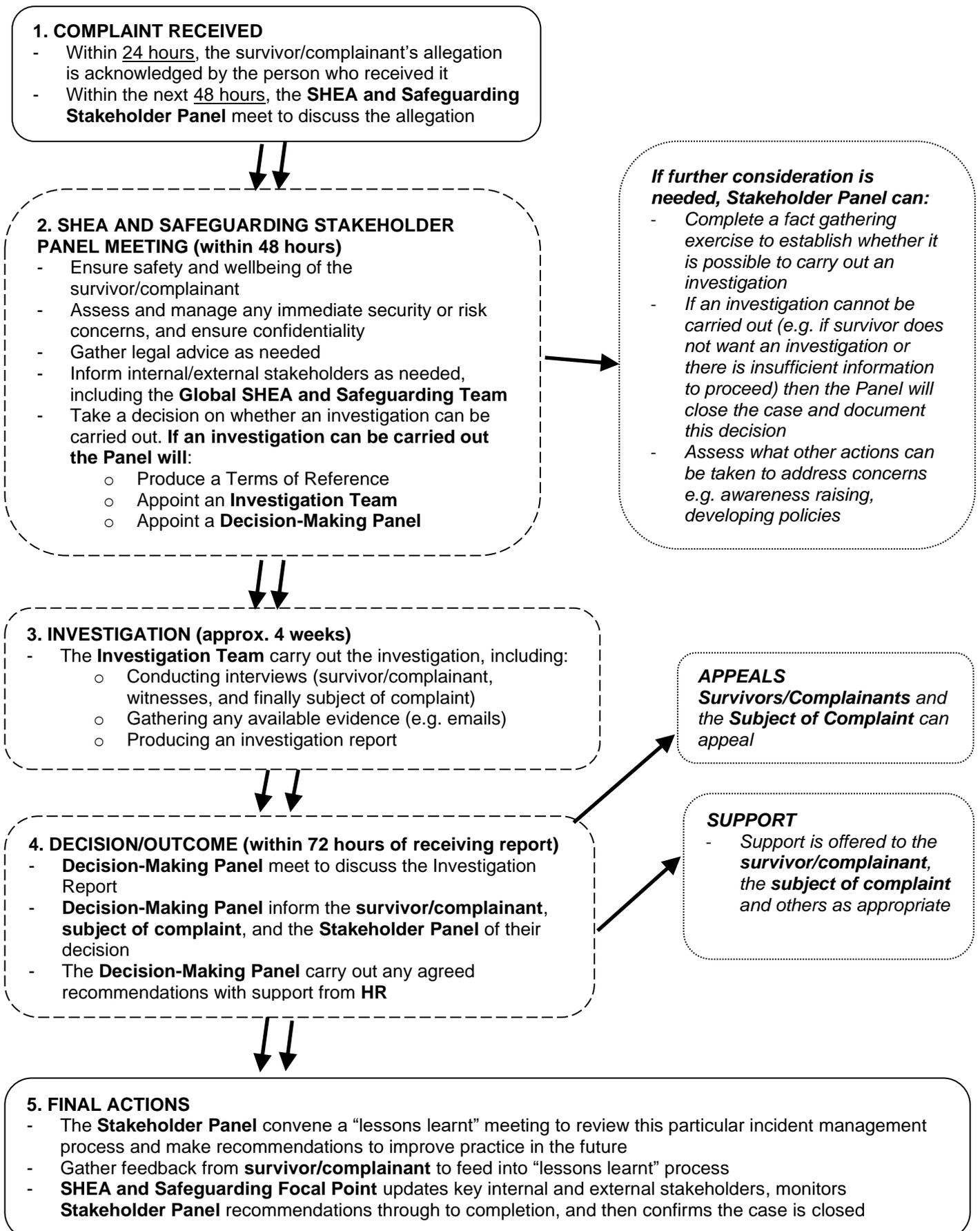
In line with our survivor-centred approach, support will be offered to survivors and complainants, regardless of whether a formal response is carried out (e.g. an investigation). Survivors and complainants can choose if and when they would like to take up the support options available to them.

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).

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@actonaid.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.
- As long as it does not expose a child to risk she/he must be known by her given name. If names need to be changed this 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.

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 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 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. like 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 find any content published by ActionAid that contravenes the practices of this policy, the relevant line manager must be informed immediately.

Appendix 4 – Permission for use of information and images

ActionAid Consent form October 2018 which needs to be signed by an adult on behalf of the child, but with the child's permission, to be used with the guidance document (<https://stories.actionaid.org/?r=96628&k=9560d44e62>)

ActionAid in [COUNTRY] and internationally [together with [NAMED PARTNER] if the content is being collected by the partner] is conducting interviews in [LOCATION] to obtain footage/photographs/data/knowledge concerning [WHY]

Some or all of the information, your words, video, photographs or other contributions you make/ appear in will be shared by ActionAid, securely stored and may be used to support ActionAid's work throughout the world for the following purposes:

I understand and agree that the information, statements, images, and video footage that I provide may be used in many different forms, including:	Yes	No
In print, e.g. newspapers and reports		
On traditional media, e.g. television and/or radio		
In electronic media, e.g. social media, internet		

I agree that some or all of the information, statements, images, video footage or other contributions I make/appear in may be used for any of the following purposes:	Yes	No
To publicise and promote ActionAid's work		
As part of ActionAid's marketing and fundraising material		
In connection with ActionAid's campaigns, advocacy, educational and/or media work		
In connection with ActionAid's research and/or monitoring and evaluation work		
In connection with ActionAid's sponsorship and/or programming work		
To help raise money when required for ActionAid through specific appeals for aid relating to Emergencies and Disasters.		
By a donor to publicise its relationship with ActionAid and/or its support for a program		
Shared with Partners with whom ActionAid has a contract and/or		
By the photographer/videographer who has captured the images to promote their own commercial interests and/or support our work.		

I understand that this consent agreement does not constitute a contract for cash, goods or services. It is for a limited time of five years, after which ActionAid will need to obtain further authorisation from me to use my content, however ActionAid can continue to store my data.

I understand that if my comments, information, image or video footage is uploaded to social media or other websites, then ActionAid has no control over the copying or distribution of such material by other internet users. ActionAid will however remove all relevant content from Social Media and Internet websites that are directly under its control following your request for removal

I understand that I can retract my consent at any time and have the contact details of my local ActionAid office who will help me do this if requested.

ActionAid or Partner contact number if you need to withdraw your consent or have any questions:

Thank you for your cooperation

Subjects details
I [Name] understand the above and agree to the uses as stated above.
Date:
Signature:
Name and Signature of Parent or Guardian if subject is less than 18 years of age.
Relationship to child:

<i>ActionAid staff member, partner or representative collecting the consent</i>	
Name:	Date:
Signature:	Role/ position and partner organisation name:
Name of the person giving consent in Latin script if another script has been used:	
Name to be used if the person doesn't want their real name disclosed:	

Appendix 5 – Child Risk Assessment template

This form is to be completed by staff 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

Risk Assessment							Risk Management				
Project activity	Identify risk to child	Analysis of risk factors – what is causing the risk?	What are the control measures currently in place?	Risk calculation			What are the agreed additional controls/actions to be put in place to mitigate the risk?	By whom	Risk Calculation		
				Likelihood	Impact	Risk Level			Likelihood	Impact	Risk Level
<i>e.g. interviewing internally displaced school children</i>	<i>Published material causing risk to safety of children</i>	<i>Lack of due diligence in agreeing consent and anonymising material</i>	<i>Consent form; agreed processes on anonymising children in published material</i>	<i>M-2</i>	<i>H</i>	<i>H</i>	<i>Training of non-Comms staff due to travel to conflict areas and work with children; sharing of relevant policies in advance</i>	<i>Technical expert; Line manager</i>	<i>L-1</i>	<i>H</i>	<i>M</i>
Insert further rows as needed											