

ActionAid UK

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

Policy for all staff and other representatives

1.	ActionAid's SHEA and Safeguarding approach.....	2
1.1	Feminist Leadership Principles	4
2.	Purpose and Scope.....	4
2.1	Purpose.....	4
2.2	Scope	5
3.	Roles and Responsibilities	6
4.	Child Safeguarding Policy	8
5.	Protection from Sexual Exploitation and Abuse (PSEA) Policy	9
6.	Sexual Harassment, Exploitation, and Abuse (SHEA) at Work Policy	9
7.	Working with Partners.....	10
8.	Safer Recruitment and Employee Life Cycle	10
9.	Safer Programming	10
10.	Creating Safe Working Environments	11
11.	Interaction with Rights Holders and Community Members, including Adults at-risk.....	11
12.	Fundraising.....	11
13.	Reporting SHEA and Safeguarding Concerns and Complaints.....	11
13.1	Reporting and ActionAid's Survivor-Centered approach.....	12
13.2	How to report a SHEA and Safeguarding concern or complaint.....	13
13.3	Responding to SHEA and Safeguarding Concerns and Complaints	14
13.4	Incident Management Process.....	15
13.5	Incident Management Roles and Responsibilities	18
13.6	Management of complex SHEA and Safeguarding reports.....	20
14.	Confidentiality.....	23

14.1	Data Protection	23
15.	Support Options.....	24
16.	Further Reading & Resources.....	24
	Appendix 1 Reporting Flowchart.....	25
	Appendix 2 Incident Management Flowchart.....	26
	Appendix 3 SHEA & Safeguarding Language Definitions	27
	Appendix 4 SHEA and Safeguarding Risk Assessment template	35

1. ActionAid’s SHEA and Safeguarding approach

ActionAid is committed to working with others to end injustice and eradicate poverty, and to build a world which upholds the rights and dignity of all. We recognise that to work with integrity we must ‘walk the talk’ and ensure that anyone who comes into contact with ActionAid is protected from any form of injustice, discrimination, or abuse.

Safeguarding refers to the policies and processes that an organisation puts in place to prevent and respond to harm carried out by staff or those working on our behalf. ActionAid’s SHEA and Safeguarding policies sit under the **AAI Code of Conduct** and are informed by and reinforce **ActionAid’s feminist leadership approach**.

ActionAid is committed to preventing any form of sexual harassment, exploitation and abuse (including child abuse and adult at-risk abuse) and responding robustly when these harms take place.

SHEA and Safeguarding incidents are rooted in an imbalance of power, particularly gendered and sexualised abuses of power. The #metoo and #aidtoo movements of recent years have reminded us that those working with ActionAid have increased power and privilege and we must do everything we can to stop staff/representatives from abusing the power and privilege they hold. We are committed to safeguarding all people who come into contact with ActionAid from abuse of that power and privilege in any form.

This applies to everyone irrespective of race, age, gender, gender identity, sexual orientation, culture, dress, language, political affiliation, health status, class, caste, ethnicity, marital status, disability, location, pregnancy, and religion.

ActionAid views any form of sexual violence as a gross violation of human rights. We will not tolerate our staff or other representatives¹ carrying out any form of sexual harassment, exploitation or abuse towards anyone we come into contact with through our work. In line with ActionAid’s Feminist Principle 10 (Zero Tolerance), we will not tolerate any form of abuse, exploitation, or harm carried out towards our own employees, rights holders, communities, or anyone we come into contact with through our work. Zero tolerance means we will always take action when a

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

Safeguarding harm takes place, ensure that support is offered to all affected, and that the organisation learns from the harm so it does not happen again.

We recognise that gendered forms of sexual violence disproportionately affect women and girls, and our work also recognises the impact on boys, men, transgender and non-binary people. We are committed to having an inclusive safeguarding approach and working with marginalised oppressed, and hard to reach groups, including groups in hard to reach areas. We will listen to and learn from them so that our SHEA and Safeguarding approach supports the work they do to promote their rights and live lives with dignity. Intersectional feminism shows us that in order to defeat patriarchy, we need to address the other forms of oppression that reinforce it. As part of living out our feminist principles, we will champion intersectionality by recognizing the diverse and connected experiences of different groups and take action to ensure we do not compound harm. We will take action to ensure our approach is anti-racist, inclusive, and safe for all.

We have to acknowledge that some staff and other representatives will use their position of power for personal gain, exploiting the trust placed in them to harm others. We must do everything we can to reduce the likelihood of this happening and respond swiftly and robustly when incidents take place. 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 to allegations of sexual harassment, exploitation and abuse. We take all concerns seriously and carry out timely and robust responses to allegations of harm.

No one will be victimised for making a complaint and ActionAid is committed to taking a survivor-centred approach throughout. This means we work with survivors to ensure they are central to any response, are not further harmed or disempowered by any processes, and receive support throughout.²

SHEA and Safeguarding is about fundamentally re-thinking our sector's approach to humanitarian and development work. It asks us to question the work cultures we create and perpetuate and to challenge the norms and power structures inherent in aid work. In doing so, we can create radical new approaches which help to ensure that our behaviours, work cultures, and processes do not deliberately or inadvertently cause harm.

ActionAid is committed to:

- Creating a **safe working culture** that upholds the rights and dignity of all, founded on AAI's values and mission, outlined in our Code of Conduct, and our Feminist Leadership approach.
- In line with ActionAid's **intersectional feminist approach**, ensuring that our SHEA and Safeguarding work continuously learns from the voice and experience of marginalised and oppressed groups and challenges destructive systems of power.
- Ensuring that our approach is **survivor-centred**. That is, that we are committed to upholding the power and dignity of survivors by respecting their confidentiality and their right to make decisions over what happens to them, where it is safe and appropriate for them to do so.

² We use the term 'survivor' to represent a person who has experienced sexual abuse, exploitation, or harassment. AAI uses the term *survivor* as part of our survivor-centred approach as it emphasises the power of the individual, whereas the term 'victim' can be disempowering. However, those affected by sexual harassment, exploitation and abuse can choose the term they prefer. Throughout any process, AAI will work with all involved to ensure the rights of everyone are protected at all times.

- Demonstrating our **zero-tolerance approach** to sexual harassment, exploitation and abuse and other Safeguarding concerns by:
- ensuring that all allegations of sexual harassment, exploitation and abuse and other Safeguarding concerns are **responded to in a timely, robust, and survivor-centred manner**.
- ensuring that we **embed our SHEA and Safeguarding approach** into every aspect of our work – how we recruit, to how we build capacity, to how our programmes are designed – so that we uphold the rights of all to live and work with integrity, free from violence and harm.

1.1 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:

- Self-awareness
- Self-care and caring for others
- Dismantling bias
- Inclusion
- Sharing power
- Responsible and transparent use of power
- Accountable Collaboration
- Respectful Feedback
- Courage
- Zero Tolerance

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

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

2. Purpose and Scope

2.1 Purpose

The purpose of this policy is to outline ActionAid UK's approach to Sexual Harassment, Exploitation and Abuse (SHEA) and other Safeguarding concerns (including child abuse and adults at-risk abuse). All staff and other representatives must familiarise themselves with this overarching policy, alongside ActionAid's Code of Conduct, and refer to the three core policies outlined below for more detailed information and guidance on implementing SHEA and Safeguarding. ActionAid recognises the ways in which different forms of sexual violence and abuse of power intersect and inform each other; however, in order to identify and address the different ways in which these abuses of power

manifest we have developed three distinct policies that all staff and other representatives are expected to abide by:

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

The below table shows different forms of harm and what policy they sit under:

Form of Harm	Policy this falls under
Harmful behaviour carried out by staff/representatives towards other staff and representatives	Sexual Harassment, Exploitation and Abuse at Work policy
Harmful behaviour carried out towards children and young people	Child Safeguarding policy
Harmful behaviour carried out towards rights holders and communities, including adults at-risk	Protection from Sexual Exploitation and Abuse policy
Bullying and Harassment	AAI Bullying and Harassment policy AAUK Harassment Policy
Discriminatory Behaviour & other harmful work based behaviour	AAUK Grievance Policy and Procedure
Illegal and/or improper conduct and wrongful acts including, but not limited to, suspected fraud, criminal activity, or miscarriages of justice	AAUK Whistleblowing Policy
Allegations of trafficking or modern slavery	AAI Anti-Slavery and Human Trafficking policy

2.2 Scope

This policy is binding for all offices and working locations of ActionAid UK (AAUK), and at both the organisational and project level. This policy supersedes any previous SHEA and Safeguarding policies.

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

All staff and representatives named above can raise a complaint via the procedures outlined in Section 13 of this policy.

All community members and rights-holders including adults at-risk and children can raise a complaint about any ActionAid staff member or other representatives, using the channels as outlined in the policy.

ActionAid Directors/International Leadership Team and International Board hold overall accountability for this policy and its implementation. They are responsible for ensuring the policy is reviewed and updated every three years. ActionAid Directors/International Leadership Team and International Board may hold departments accountable to ensure that they align their work to this policy and embed safeguarding in their work.

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

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

3. Roles and Responsibilities

We all have a role to play in keeping people safe and creating a safe working environment. The positive behaviours all staff/representatives are expected to demonstrate at all times are outlined below, as well as the behaviours staff/representatives must avoid. Some roles have additional responsibilities to embed SHEA and Safeguarding, which are also outlined.

Staff/representatives must:

- Help create a safe work environment by treating everyone they come into contact with through their work with kindness, decency and respect.
- Set a positive example both on and off duty by living out ActionAid's values at all times and adhering to the SHEA and Safeguarding policies and ActionAid's Code of Conduct.
- Embed Safeguarding into their work to make sure everyone they work with is safe from harm, and work closely with their SHEA and Safeguarding Focal Point and Stakeholder Panel.
- Raise concerns about SHEA and Safeguarding incidents (e.g. harm to a person) or risks (e.g. in programmatic work) to their Safeguarding Focal Point or other responsible person as soon as possible. *More details on reporting SHEA and Safeguarding concern and complaints can be found in Section 13 of this policy.*
- If you have experienced harm yourself, you can choose if, when, and how you want to tell anyone. If you choose to tell ActionAid what has happened to you, we will offer you support. This is part of ActionAid's survivor centred approach.

Staff/representatives must not:

- Sexually harass, exploit or abuse anyone they come into contact with through ActionAid's work.
- Create a working environment which violates the dignity and rights of others, whether working face to face (e.g. in offices, external spaces) or online (e.g. in digital spaces).
- Stop or discourage others from reporting concerns or raise malicious complaints.

Country/Executive Directors must:

- Create a safe environment where staff and others feel able to raise concerns without fear of retribution by setting a positive example both on and off duty and promote the global SHEA and Safeguarding policies.
- Ensure at least one SHEA and Safeguarding Focal Point and a SHEA and Safeguarding Stakeholder Panel are in place who will raise awareness of SHEA and Safeguarding, receive and manage concerns, and support the wider entity to embed SHEA and Safeguarding.

- Have overall responsibility for SHEA and Safeguarding cases and ensure the safe management of all concerns by:
 - supporting the Focal Point and Panel to raise all concerns to the Global SHEA and Safeguarding Team and ensuring they work with them on any follow up actions
 - ensuring all actions taken are in line with the global policies and local laws, that survivors are supported; that disciplinary procedures are implemented for staff members who violate the global policies, and that donor reporting is managed in line with the Donor Reporting SOPs.
 - As part of this, reassure staff/representatives that the policies apply to all equally and that all concerns will be taken seriously regardless of the position of the staff member concerned.
- Ensure adequate funding is in place to support SHEA and Safeguarding activities in their country (e.g. budget to ensure that all staff receive annual training, budget for translation of policies and other core documents to ensure they are accessible to all).
- Not engage in sexual or romantic relationships with any ActionAid staff or other representatives.

Line Managers must:

- Ensure their area of responsibility is a safe environment where SHEA and Safeguarding is embedded and everyone feels able to raise concerns without fear of retribution.
- Ensure staff members in their line of management are recruited safely and in line with safer recruitment standards, that they receive an induction and further training on the SHEA and Safeguarding policies, that they know how to report concerns and are encouraged to report, and that budget is made available to support safeguarding (e.g budget for staff training).
- Not engage in sexual or romantic relationships with ActionAid staff or other representatives in their line of management.
- Support staff members who raise Safeguarding concerns, and support the SHEA and Safeguarding Focal Point and Stakeholder Panel to address any concerns.
- Ensure that poor practice or negative behaviour by staff in the line of management are challenged to help create a safe environment and prevent Safeguarding harms.
- Ensure that all processes, procedures, and activities are designed and carried out in a way which seeks to minimise the risk to staff and others and that they include a Safeguarding and safety lens.

SHEA and Safeguarding Focal Points must:

- Work closely with the Global SHEA and Safeguarding Team to build capacity and share learning (e.g attending training, leading on country activities).
- Work with the SHEA and Safeguarding Stakeholder Panel and others in their entity to create a safe environment where everyone is able to raise concerns and everyone is committed to SHEA and Safeguarding.
- Deliver training and awareness raising sessions to all staff on the SHEA and Safeguarding policies, and work with HR and Line Managers to ensure all new staff receive inductions on this topic.
- Work with others to ensure that the SHEA and Safeguarding policies are embedded throughout all ActionAid's programmes and activities, and those of our partners.
- Support with the management of SHEA and Safeguarding concerns by raising all concerns to the Global SHEA and Safeguarding Team, working with the global team to address the concern, ensure all actions taken are in line with the global policies and local laws, that survivors are supported, and that donor reporting is managed in line with the Donor Reporting SOPs.
- Ensure that this policy is accessible to all and is displayed at prominent places within the office, as well as online.

SHEA and Safeguarding Stakeholder Panel must:

- Work closely with the SHEA and Safeguarding Focal Point to build capacity on SHEA and Safeguarding, embed safe practices across AAUK, and manage incidents.
- Work with others to ensure that the SHEA and Safeguarding policies are embedded throughout all ActionAid's programmes and activities, and those of our partners.
- Work with the SHEA and Safeguarding Stakeholder Focal Point and Global Team to address concerns relating to sexual harassment, exploitation, and abuse, and ensure incident management is carried out in line with ActionAid's SHEA and Safeguarding approach, within agreed timeframes, and always adheres to ActionAid's feminist and survivor centred approach.
- At AAUK, the SHEA & Safeguarding Stakeholder Panel consists of: AAUK CEO, AAUK Safeguarding Lead (Safeguarding Focal Point), Company Secretary, Deputy Director of IDPP and/or Deputy Director of HPP. Other roles may need to be brought to the Panel, such as an HR representative, on a case-by-case basis always keeping in mind the overriding importance of maintaining confidentiality and sharing information on a need to know basis only.

Human Resources colleagues must:

- Work with others to create a safe environment by embedding the SHEA and Safeguarding policies into the employee life cycle (including recruitment, induction, performance management and exit).
- Embed the SHEA and Safeguarding policies and feminist leadership principles into HR policies and practices, and into organisational culture change processes (e.g ensure the policies are accessible to all and that everyone knows how to report and is encouraged to report concerns).
- Work with the SHEA and Safeguarding Stakeholder Panel to address any concerns relating to sexual harassment, exploitation, and 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.

4. Child Safeguarding Policy

The purpose of this policy is to ensure that procedures are in place to protect all children from deliberate or unintended actions that place them at risk of abuse or exploitation carried out by any member of the ActionAid Federation or other representative. This policy highlights our approach to child safeguarding, with detailed guidance on key areas such as content gathering, complaints mechanisms and others.

Key policy positions:

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

5. Protection from Sexual Exploitation and Abuse (PSEA) Policy

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

ActionAid defines an adult at-risk as someone over the age of 18 who, for physical, social, economic, environmental or other factors can be more vulnerable to abuse, exploitation or other harms in particular sexual abuse and exploitation.³

Key policy positions:

- ActionAid strictly prohibits staff and other representatives from engaging in any form of abusive, exploitative or harmful behaviour towards rights holders, community members or adults at-risk.
- ActionAid strictly prohibits staff and other representatives from engaging in any form of sexual activity including sexual or romantic relationships, with rights holders (people directly receiving assistance from ActionAid or involved directly in any programming activities) or adults at-risk.
- Relationships or any kind of sexual activity with community members who are not rights holders (i.e. not receiving direct assistance from ActionAid or involved directly in any programming activities) are not prohibited however, staff and other representatives must ensure the relationship is not and could not be perceived to be exploitative or abusive. This must be raised to the Country Director to manage the potential risks.
- ActionAid strictly prohibits staff and other representatives from buying sex. ActionAid's SHEA and Safeguarding approach does not condemn nor discriminate against sex workers or make judgements on people who sell sex. However, noting that sex workers are at risk of harm and in order to prevent an abuse of power and sexual exploitation, ActionAid prohibits staff/representatives from buying sex in any form. This ban arises from the history of abuse in our sector, and ensures we are in line with the IASC Core Principles on PSEA.
- 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. Where applicable, ActionAid will also cooperate fully with local authorities to ensure the safety of children and others.
- All staff and other representatives have a duty to protect the rights holders and communities we work with, including adults at-risk, and ensure that ActionAid's SHEA and Safeguarding approach is embedded into all areas of ActionAid's work. Every aspect of our work must be carried out in a way that ensures the rights and dignity of rights holders, community members, and adults at-risk. We are committed to working with them to ensure that they are not simply safe from harm but safe to realise their rights and be active agents of change.

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

³ Safeguarding duties apply to an adult who:

- o needs additional care and support
- o is experiencing, or at risk of experiencing, abuse or neglect
- o as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect

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

Key policy positions:

- Staff and other representatives have a duty to create a safe working environment that respects the dignity and rights of all.
- Staff and other representatives are strictly prohibited from carrying out any form of sexual harassment, exploitation or abuse towards anyone they come into contact with through their work. ActionAid is committed to ensuring that all ActionAid staff and other representatives can operate in an environment in which they are not simply safe from harm but safe to realise their rights and work with dignity.
- ActionAid prohibits staff and other ActionAid representatives from having a sexual or romantic relationship with people who they line manage, supervise or who are in their line of management. In the case of the most senior staff at director or leadership team level, this prohibition includes sexual or romantic relationships with any more junior staff.
- Recognising the imbalance of power within funding and funded entities, and the potential for that power to be exploited, ActionAid prohibits staff from engaging in sexual activity with staff from its partners where this is or could be viewed as an abuse of power.
- ActionAid does not prohibit staff from beginning relationships with each other outside of the unequal power dynamics outlined above but all staff and other representatives engaged in or beginning relationships with other staff or other representatives must behave professionally and conduct their relationships in a way that does not impact on ActionAid's work.

7. Working with Partners

For more information on Working with Partners, please look at the AAUK Child Safeguarding policy, AAUK Sexual Harassment, Exploitation and Abuse at Work Policy, and the AAUK Protection from Sexual Exploitation and Abuse (PSEA) Policy.

8. Safer Recruitment and Employee Life Cycle

An important way of creating a safe working environment is to embed SHEA and Safeguarding into the employee life cycle. We can do this by

- ensuring we recruit staff safely
- that staff receive an induction on SHEA and Safeguarding
- that performance and behaviour concerns are addressed promptly
- that we share safe and respectful information via references as part of our commitment to the wider sector.

For more information on safer recruitment processes and the employee life cycle, please look at the AAUK Child Safeguarding policy, AAUK Sexual Harassment, Exploitation and Abuse at Work Policy, and the AAUK Protection from Sexual Exploitation and Abuse (PSEA) Policy.

9. Safer Programming

We must ensure that our programmes and processes are safe so that we do not enable staff or other representatives to cause harm, and so that we do not inadvertently put ourselves or those

we work with at risk. All programmes and wider activities (e.g. events, meetings, campaigns) must include SHEA and Safeguarding in their planning, implementation, and review; for example, embedding SHEA and Safeguarding into Risk Assessments, ensuring staff/representatives are aware of SHEA and Safeguarding, that relevant reporting options are available and that people are encouraged to report.

For more information on safer programming, please look at the AAUK Child Safeguarding policy, and the AAUK Protection from Sexual Exploitation and Abuse (PSEA) Policy.

10. Creating Safe Working Environments

For more information on Creating Safe Working Environments please look at the AAUK Sexual Harassment, Exploitation and Abuse at Work Policy.

11. Interaction with Rights Holders and Community Members, including Adults at-risk

For more information on Interaction with Rights Holders and Community Members, including Adults at-risk, please look at the AAUK Protection from Sexual Exploitation and Abuse (PSEA) Policy.

12. Fundraising

For more information on Fundraising, including Child Sponsorship, please look at the AAUK Child Safeguarding policy.

13. Reporting SHEA and Safeguarding Concerns and Complaints

The AAI Code of Conduct states that it is the duty and the responsibility of all staff and other representatives to report any suspicions or incidences of sexual harassment, exploitation and abuse. This applies to ActionAid staff and other representatives including (but not limited to) partners, volunteers (including board and assembly members), consultants, and contractors/suppliers/vendors. This is a key way to challenge inappropriate behaviours and help create a safe work environment.

ActionAid is committed to creating a working culture in which everyone feels safe to raise a concern. If a staff member or other ActionAid representative does not report an incident or suspicion, they will be in breach of the Code of Conduct and may face disciplinary proceedings. This does not apply to survivors who can decide if, when and how to report.

If any ActionAid staff or other representatives have concerns that a rights holder or community member, including adults at-risk, has been or it at risk of being abused, exploited, or harmed in any way they must report this immediately in line with the reporting procedures in section 13.2.

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

All staff and other representatives are required to report if:

- A rights holder or community member alleges that they or another person is experiencing or at risk of experiencing sexual exploitation or abuse - whether carried out by ActionAid staff and representatives, or others.

- A staff member or other representative suspects that someone connected to ActionAid is or may be about to carry out sexual exploitation or abuse towards rights holders, community members or somebody not connected to ActionAid.
- A staff member or other representative suspects that someone external to ActionAid (e.g. a Teacher or Community Leader) is or may be about to carry out sexual exploitation or abuse towards rights holders, community members, or others. This is not a breach of this policy as the harm is not carried out by staff/representatives; however, as part of our commitment to eradicating violence and ending poverty we still have a duty to report such concerns. This must be reported to the local SHEA and Safeguarding Focal Point and Country Director, who has overall responsibility for referring this to an external agency so that this can be safely addressed.

Members of the public (e.g. anyone external to ActionAid) can also raise concerns about ActionAid staff or other representatives using the reporting procedures outlined **in section 13.2**.

If the allegation does not relate to ActionAid, such as harm carried out during the course of a staff member's work, then ActionAid will look at how best to safely respond (including raising with external agencies better able to support), and will take any action with the best interests of the survivors in mind.

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

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

The CEO, through designated positions/teams, will work with the Global SHEA and Safeguarding Team to ensure that donors and others (e.g. other ActionAid countries so that they can fulfil their own donor reporting requirements; statutory/regulatory bodies) are informed of SHEA and Safeguarding concerns, in line with the AAI Donor Reporting SOPs. Any breach of the SOPs will be raised to the CEO for action.

13.1 Reporting and ActionAid's Survivor-Centered approach

In line with ActionAid's survivor-centred approach, individuals do not have to report their own experience of sexual harassment, exploitation, or abuse.

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

As part of our survivor-centred approach, survivors/complainants can choose if, when, and how to make a report and decide whether they want ActionAid to take formal action. However, there may be occasions where ActionAid has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case by case basis and the decision will be made by the SHEA and Safeguarding Stakeholder Panel, in conjunction with the Global

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

There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed but ActionAid will take every reasonable measure to address the concern. For example, by gathering any available evidence and contacting witnesses, where a risk assessment shows it is safe to do so. Concerns raised about ex-ActionAid staff/representatives (e.g. people formerly employed by ActionAid in any capacity) will be addressed as far as possible, recognizing potential legal challenges to such processes.

ActionAid will ensure that the safety, dignity and rights of the survivor are respected at all times. We are committed to carrying out robust and fair investigations that protect the rights of all involved, with a particular focus on the survivor/complainant and the subject of the complaint, ensuring that confidentiality is maintained and that the wellbeing of all is protected.

13.2 How to report a SHEA and Safeguarding concern or complaint

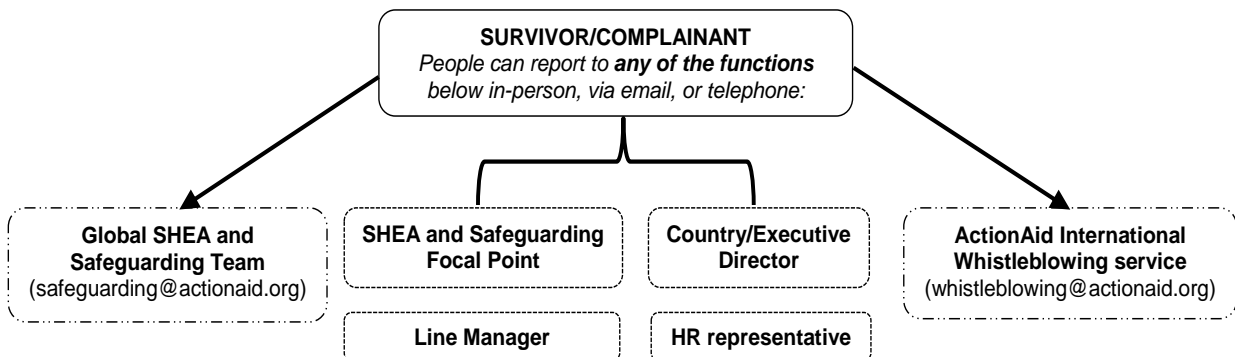
ActionAid staff members and other representatives can report SHEA and Safeguarding concerns in AAUK to any of the following channels in person, via email, or telephone:

- SHEA and Safeguarding Focal Point
- SHEA and Safeguarding Stakeholder Panel members
- Board Member (e.g SHEA and Safeguarding Board Lead)
- CEO
- Line Manager
- HR Representative

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

AAI Global SHEA and Safeguarding Team (safeguarding@actionaid.org)

AAI Whistleblowing Service (whistleblowing@actionaid.org)



For a more detailed graphic, please see Appendix 1: Reporting Flowchart.

To report SHEA and Safeguarding concerns to the SHEA & Safeguarding Focal Point in ActionAid UK please email uk.safeguarding@actionaid.org

13.3 Responding to SHEA and Safeguarding Concerns and Complaints

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

ActionAid will work with survivors and complainants to understand how they would like the issue they raised to be addressed; this policy does not prejudice the right of survivors and complainants to use external procedures (e.g. criminal justice procedures) where that is their preference to do so. Support options will be offered to survivors and complainants regardless of whether or not they decide to make a formal complaint. *Please see Section 15 in this policy or the UK Safeguarding SharePoint Hub for further details on Support Options.*

If a survivor or complainant makes a formal complaint and wants an investigation to be carried out, or if ActionAid takes the view that they have a duty of care to carry out an investigation, then an investigation process will be initiated, and must follow the **Global SHEA and Safeguarding Team's Investigation Guidelines**. The GS and AAUK must have measures in place to ensure that **any investigations carried out are objective, timely, fair and transparent** and built on ActionAid's SHEA and Safeguarding approach. All parties should be able to participate in the investigation without fear of retaliation. The SHEA & Safeguarding Stakeholder Panel has the authority to challenge actions/decisions taken by anyone in the incident management process if they have concerns this goes against ActionAid's SHEA and Safeguarding approach, feminist principles, or values as an organisation.

As part of ActionAid's survivor centred approach, our incident management process puts the survivor's needs and wishes at the centre of the process. ActionAid will work with survivors to ensure they have support that is right for them. At ActionAid we recognise how trauma can impact on survivors and are committed to removing barriers in our systems, policies and approaches which could lead to re-traumatisation of survivors.

In some cases, concerns may fall partially or wholly under other policies. For instance Bullying and Harassment and some types of prohibited interpersonal relationships are managed by HR. There can be a grey area between sexual harassment (any type of unwanted sexual behaviour) and other forms of discrimination (racism, sexism, homophobia, ageism, transphobia etc). In these cases, a collaborative approach between SHEA and Safeguarding representatives and the department who owns the policy may be appropriate. If the concern is outside the remit of the SHEA and Safeguarding policies, the SHEA & Safeguarding Focal Point/Stakeholder Panel/Global SHEA and Safeguarding team will support the survivor/complainant in following up with the appropriate function.

UK law may need to be taken into account in the Incident Management Process. It is the responsibility of the management team in AAUK to ascertain what laws apply to incidents of SHEA and Safeguarding (for instance if internal processes must take place within a certain timeframe; if there is mandatory reporting to police; or if a Subject of Concern has a right to cross-examine the complainant). Where the processes need to be adjusted in line with local law, this should be done

with the advice of a Safeguarding subject matter expert, keeping as close to the spirit of the policy as possible, and prioritising ActionAid's values and survivor centred approach.

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

If the Global SHEA and Safeguarding Team have concerns that AAUK is not responding to a concern in line with these policies (e.g. not taking action in a timely way, or not taking action in line with AA's values) the Global SHEA and Safeguarding Team will raise this first with the CEO for action. If no action is taken within 72 hours, the Global SHEA and Safeguarding Team will inform the Head of Country Support who will follow up with the CEO and request action within 48 hours. If no action is taken, or there are sustained concerns, this will be raised to the International Leadership Team and if needed to the International Board for wider action.

Security in SHEA and Safeguarding incident management

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

Retaliation Against Complainants, Victims and Witnesses

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

False or malicious complaints

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

13.4 Incident Management Process

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

- Within 24 hours the complaint is acknowledged and the SHEA and Safeguarding Focal Point (or other staff member as appropriate) will engage with complainant/survivor to ensure they are safe and their concerns are understood. The Global SHEA and Safeguarding Team is informed so they can support as appropriate and manage donor reporting requirements.
- Within 48 hours the SHEA and Safeguarding Stakeholder Panel meet to discuss the case.
- The SHEA and Safeguarding Stakeholder panel will triage all cases to assess what action can be taken. If an investigation cannot be carried out (e.g. if survivor does not want an

investigation or there is insufficient information to proceed) then the Panel will close the case and assess what other actions can be taken to address concerns e.g. awareness raising and ways to support the survivor. If the actions on the case are led by another agency, the Stakeholder Panel will assess and carry out any actions that can be taken by ActionAid (e.g. assessing recruitment practices, or developing an action plan to prevent risks happening in future). At all times the wellbeing of the survivor/complainant will be paramount.

- Risk assessment carried out to address any immediate security or welfare concerns, and legal guidance sought. If the concern includes a partner organization, risk assess their involvement.
- Investigation Team and separate Decision Making Panel appointed. This must be done in line with UK law. Where applicable the Stakeholder Panel will obtain a legal opinion to ensure that any follow up actions are aligned to relevant UK laws.
- There is no time limit on the activities of the SHEA and Safeguarding Stakeholder Panel. They must take action as quickly as possible to ensure they are managing risk and the rights of all involved. However, in line with our survivor centred approach, timing will depend on the needs and wishes of the survivor and so no time limit is set for this stage. The Stakeholder Panel will keep the survivor and subject of concern updated throughout, and ensure they are supported.

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

- Following the Investigation Guidelines set out by the Global SHEA and Safeguarding team, an investigation can include carrying out any interviews, gathering any available evidence, and producing an investigation report.
- The survivor/complainant should be interviewed first (or provide a written response to questions submitted by the Investigation Team where a verbal interview is not possible), followed by any witnesses and the complainant if not the survivor, and then the subject of complaint. The Subject of Concern will be interviewed last, unless this is prohibited by UK law. If that is the case, then action will be taken to ensure earlier interactions are managed safely and in line with the spirit of this policy. It is important to note that sexual exploitation and abuse in all its forms usually occurs away from the public eye and it therefore may be difficult to produce evidence. An individual can raise a complaint even if they can point to no objective evidence other than their own experience.
- The Investigation Report is submitted to the Decision Making Panel.
- If a partner organization is responsible, they may use their own investigation process if it aligns with ActionAid's approach and values or use the Investigation Guidelines set out by the Global SHEA and Safeguarding Team. ActionAid should be treated as a key stakeholder in this process, and updated regularly.

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

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

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

- Decision Making Panel document the decision and inform the complainant/survivor and subject of complaint of the outcome.
- The Global SHEA and Safeguarding Team is informed of the outcome.

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

For a detailed graphic, please see Appendix 2: Incident Management Flowchart.

13.5 Incident Management Roles and Responsibilities

SHEA and Safeguarding Stakeholder Panel

- AAUK has a standing SHEA and Safeguarding Stakeholder Panel who is tasked with receiving all SHEA and Safeguarding concerns and complaints; working with the survivor/complainant on how they want to proceed; and establishing and monitoring an investigation and entire incident management process if this is agreed on.
- The panel will triage all cases to assess what action can be taken and in what order. As part of this they will complete a fact gathering exercise to establish whether it is possible to carry out an investigation. If an investigation cannot be carried out (e.g. if survivor does not want an investigation or there is insufficient information to proceed) then the Panel will close the case and document this decision. They will assess what other actions can be taken to address concerns e.g. awareness raising, developing policies.
- The SHEA and Safeguarding Stakeholder Panel will:
 - Create the Terms of Reference (TOR) for the investigation,
 - Appoint an Investigation Team who will carry out an investigation and produce a report,
 - Appoint a Decision Making panel who will have responsibility for receiving the report, taking a decision on the case, and taking forward any actions. The SHEA and Safeguarding Stakeholder Panel must ensure that there is no conflict of interest, and that these individuals have the training and awareness to carry out the task (e.g. training on Safeguarding, gender justice etc)
- The importance of confidentiality will be discussed so that everyone is aware of expectations and any possible consequences should confidentiality not be maintained.
- Take responsibility for overseeing the process and ensuring that all investigations are carried out in line with ActionAid's values and that a fair process is carried out for all.
- The Safeguarding Focal Point is responsible for ensuring that each case is documented in its entirety, that all activities are undertaken in line with ActionAid's SHEA and Safeguarding approach, and for updating the Global Safeguarding Team on the case and outcomes.

Investigation Team

The Investigation Team will be made up of 2x Safeguarding trained Investigators. The AAI SHEA and Safeguarding Investigator Network will support on all cases, whether as lead Investigator or co-Investigator with an AA entity staff member. An external Investigator can be used where necessary, on a case by case basis, and that decision would be made by the SHEA and Safeguarding Stakeholder Panel. Members of the SHEA and Safeguarding Stakeholder Panel and the Decision Making Panel cannot be part of the Investigation Team.

The Investigation Team is responsible for:

- Carrying out interviews
- Gathering and assessing any available evidence
- Producing an investigation report which they share with the survivor/complainant, subject of complaint, the SHEA and Safeguarding Stakeholder Panel, and the Decision Making Panel.

Decision Making Panel

- The Decision Making Panel will be made up of three people, alongside dedicated HR support. At least two members of staff/representatives on the panel must be women. If this is not possible in any given situation then the reason for this must be documented by the SHEA and Safeguarding Stakeholder Panel.
- All members of the Panel must belong to a different department to that of the complainant and the accused, in order to maintain neutrality.
- The line manager of the complainant or the accused cannot sit on this panel. The Line Manager is responsible for supporting both individuals throughout the process, and their

involvement could indicate bias to one party and prevent the process from being fair and transparent.

- If a complaint is raised that relates to a senior staff member (for example a Country Director or Board Member) then a different panel may need to be constituted, and the Global SHEA and Safeguarding Team will advise on this on a case by case basis.
- One panel member will also be appointed as Chairperson and will be a senior employee. Board members and external experts can also be invited to be part of the panel.
- The panel is responsible for:
 - Reviewing the report completed by the investigation panel and determining if the alleged behaviour breaches ActionAid policy
 - Referring the accused to a disciplinary panel if deemed necessary, using the national ActionAid Disciplinary Policy and Procedure
 - Informing the SHEA and Safeguarding Stakeholder Panel of the outcome and participating in lessons learnt discussions following the closure of the case.

HR support

- Provide support and advice to the SHEA and Safeguarding Stakeholder Panel, the Investigation Team, and the Decision Making panel to ensure the process is in line with UK employment legislation
- Retain knowledge of the UK's national policies regarding sexual harassment, exploitation, and abuse, and obtains legal opinion and procures the services of a lawyer when necessary
- Provide support and carry out adjustments as needed during the investigation. This can include: temporarily changing line management or seating/office location and advising on suspension of the subject of complaint during an investigation where deemed appropriate. Suspension does not infer guilt, it is purely a measure to ensure a robust investigation can take place.

Definition of Upheld/Not Upheld

- An investigation or other process is upheld (substantiated) when it finds in favour of the complainant. We recommend using the term 'upheld' rather than 'substantiated' as the latter term relates more to criminal justice processes.
- When an investigation or other process is not upheld (unsubstantiated) it finds that there is insufficient evidence to confirm that the alleged inappropriate behaviour did take place or that, on the balance of probability, it is most likely that the behaviour did not take place.
- In some cases, a complaint may be partially upheld (substantiated), this is when it may not be possible to uphold all parts of a complaint, but some aspects of the complaint may be upheld.

13.6 Management of complex SHEA and Safeguarding reports

Nature of Concern	Report to	Response
<p>Allegation about staff at a Partner Organisation</p>	<p>SHEA and Safeguarding Focal Point/SHEA and Safeguarding Stakeholder Panel</p>	<p>Concerns regarding partner staff members must be reported immediately via the reporting mechanisms detailed in Section 13.2.</p> <p>Concerns that partner staff have harmed ActionAid staff/representatives will be managed through a joint process with the partner where possible, and by ActionAid if this is not appropriate.</p> <p>If ActionAid receives a complaint about a member of staff at a partner organisation, ActionAid will risk assess informing the partner with the aim of working with the partner to ensure this is responded to quickly and appropriately in line with ActionAid's policies and values.</p> <p>ActionAid will support a partner's capacity to manage a concern, for instance if the partner is engaging well but does not yet have the resources to respond.</p> <p>If there is reason to believe that a complaint has been dealt with inappropriately or inadequately by a partner, ActionAid must consider whether they will withdraw funding or end the relationship</p>
<p>Allegation about staff at another organisation (e.g another international aid agency)</p>	<p>SHEA and Safeguarding Focal Point/SHEA and Safeguarding Stakeholder Panel</p>	<p>Concerns raised about the behaviour of staff of another international aid agency must be reported to the SHEA and Safeguarding Focal Point and Stakeholder Panel.</p> <p>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.</p> <p>If ActionAid has concerns about the robustness or timeliness of the other organisation's response they should raise concerns to the appropriate channels in the organisation and</p>

		consider termination of engagement if no action is taken.
Allegation relating to criminal activity and/or relating to a child where others have a remit to investigate	SHEA and Safeguarding Focal Point/SHEA and Safeguarding Stakeholder Panel	<p>Allegations that staff or other representatives have carried out a criminal activity will be assessed by the SHEA and Safeguarding Focal Point/Stakeholder Panel and the Global SHEA and Safeguarding Team. They will assess on a case by case basis if there are any risks involved in sharing to the police or other external bodies (e.g. if there are concerns that informing the police or others would put the survivor/complainant at risk).</p> <p>ActionAid is not a child protection agency and does not have the expertise required to carry out investigations of child abuse itself. This will be carried out by external experts brought in specifically for this purpose. Where the external response is unable to provide this specialized service or no such service exists, then ActionAid may provide such services only as a last resort.</p> <p>For allegations in which external bodies (e.g. police) rather than ActionAid have a remit to investigate ActionAid will support the external process. For example, ActionAid will provide all necessary information, map out referral pathways as part of immediate and long term support of the survivor, and ensure the survivor is supported throughout. ActionAid will monitor the external response until it is concluded to ensure that as far as possible it is carried out in line with ActionAid's values, and using ActionAid's advocacy role to promote change where needed.</p>
ActionAid staff member or other representative raises concerns about how a complaint was managed in an ActionAid country and wants to appeal the decision	Internal report (e.g. to the Board) and the Global SHEA and Safeguarding Team	ActionAid staff members and other representatives who disagree with actions taken must first appeal in country via established processes (e.g. to the Board). If they are dissatisfied with the response they receive to their appeal, they can make a second and final appeal to the Global SHEA and Safeguarding Team, who will work with the AAI Board to review the case. They can repeal the decision made by the ActionAid country if they find in favour

		of the staff member or other representative making the appeal.
Allegation raised by staff member or representative from one ActionAid country against a staff member or representative from another ActionAid country	Global SHEA and Safeguarding Team	Concerns raised that involve staff from more than one ActionAid entity must be raised to the Global SHEA and Safeguarding Team to take action. Recognising the shared reputational risk, when possible (e.g. when a complainant wants to raise a complaint and/or there is sufficient information to take forward an investigation) a joint incident management process will be established, involving staff from both countries as appropriate, and led by the Global SHEA and Safeguarding Team and AAI Board. The risk will be monitored at the AAI Board level.
Allegation raised against a Country/Executive Director	National Board, the AAI Board, and the Global SHEA and Safeguarding Team	Concerns raised about a Country/Executive Director must be raised to their National Board, the AAI Board, and the Global SHEA and Safeguarding Team. Recognising the shared reputational risk, when possible a joint incident management process will be established between the National Board and AAI, and led by the Global SHEA and Safeguarding Team and AAI Board. The risk will be monitored at the AAI Board level.
Allegation raised against anyone in the International Leadership Team (ILT) or the Secretary General	AAI Board and the Global SHEA and Safeguarding Team	Concerns raised about anyone in the International Leadership Team (ILT) or the Secretary General must be raised to the AAI Board and the Global SHEA and Safeguarding Team who will ensure, when possible, that an incident management process takes place. The risk will be monitored at the AAI Board level.
Allegation raised against an ActionAid Board Member	Global SHEA and Safeguarding Team	Concerns raised about a Board Member must be raised to the Global SHEA and Safeguarding Team. If the allegation relates to a National Board Member then the AAI Board and the Global SHEA and Safeguarding Team will ensure, when possible, that an incident management process takes place, working with other members of the National Board as appropriate. The risk will be monitored at the AAI Board level. If the allegation relates to an International Board Member then the Global SHEA and Safeguarding Team will ensure, when possible, that an incident management process takes

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

14. Confidentiality

Confidentiality is critical to carrying out SHEA and Safeguarding work. 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 and is part of living out our survivor-centred approach. From the point of disclosure to the final outcome of any investigation, every effort will be made to maintain and promote confidentiality in order to protect the safety and privacy of everyone involved. We are committed to working with survivors/complainants and others involved in an incident management process in a confidential and respectful manner.

Information must be shared on a ‘Need to Know’ basis – that is, only those who need to be informed so they can support an investigation or because they hold overall accountability will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to a child or suggests that someone’s life is in danger, then action will need to be taken outside of standard confidentiality procedures in order to ensure that everyone is safe. This will be managed on a case by case basis, and the safety and wellbeing of the child or at-risk adult in question is always paramount. As noted above, only those who need to know will be informed so they can take effective action.

14.1 Data Protection

AAUK will ensure that it complies with UK and international data protection laws when gathering, storing, or sharing any data relating to individuals and SHEA and Safeguarding (e.g. in our fundraising, communications, and incident management approach), and will follow the Data

Protection policies owned by the Digital and Technology Team and guidance on retaining data on SHEA and Safeguarding incident management that is issued by the Global SHEA and Safeguarding Team. Any breaches of ActionAid's data protection guidelines, particularly if they put individuals at risk, will be treated as serious misconduct.

15. Support Options

In line with our survivor-centred approach, support will be offered to survivors/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 listening to and learning from survivors about what support they want, and being guided by them where safe and appropriate to do so. ActionAid is committed to working with local NGOs and women's rights groups to develop learning on safe, intersectional, and feminist support options and ensuring that the support options offered meet the needs of diverse survivors.

As appropriate, ActionAid will ensure that support is offered to those involved in an incident management process, recognising the impact this can have, for example on witnesses and those accused of carrying out inappropriate or harmful behaviours. This can include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed. Country/Executive Directors must ensure there is budget available to provide support as needed.

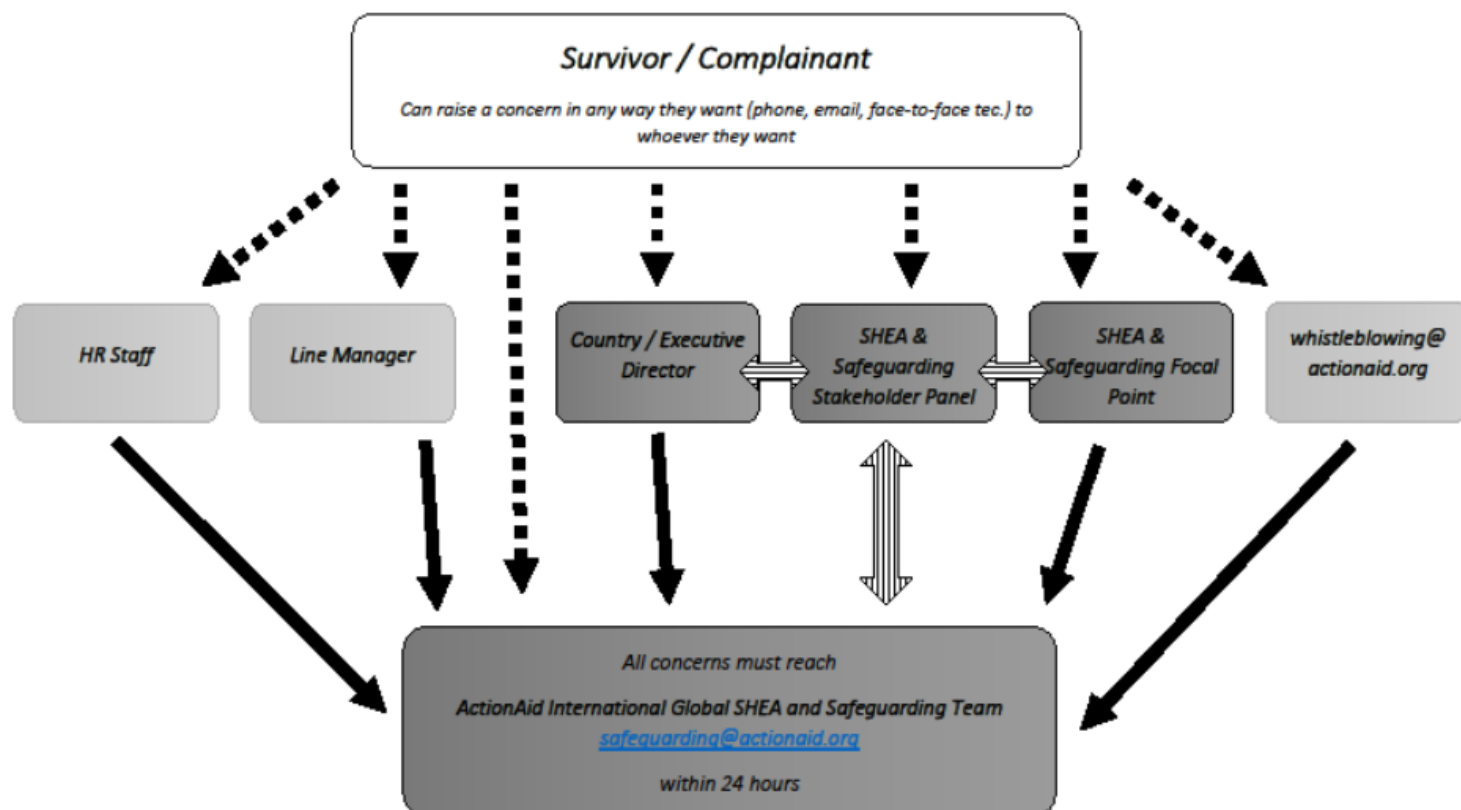
ActionAid will ensure support for children and adults at-risk is provided by appropriate professionals and organisations. ActionAid will ensure that cases are referred to them, and that due diligence is taken to ensure that they act in line with ActionAid's values and puts the welfare of the child or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

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

16. Further Reading & Resources

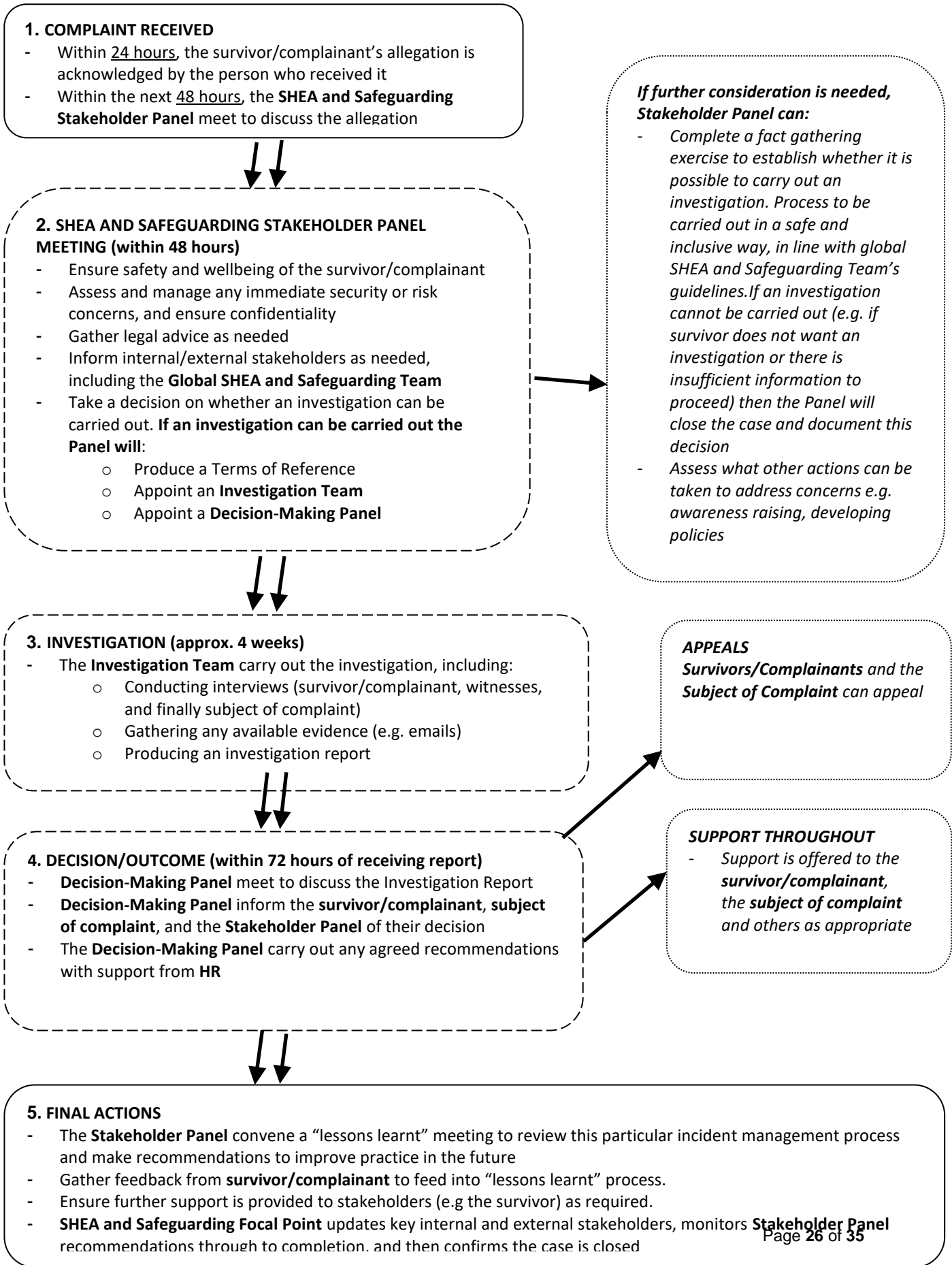
- ActionAid Community-Based Complaints Mechanisms for SHEA and Safeguarding during COVID-19, 2020
- COVID-19 SHEA and Safeguarding Risk Assessments
- Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response, 2020
- ActionAid Process Map for Donor Reporting on Sexual Harassment, Exploitation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

Appendix 1 Reporting Flowchart



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

Appendix 2 Incident Management Flowchart



Appendix 3 SHEA & Safeguarding Language Definitions

<p>Abuse</p>	<p>Domestic – “Including psychological, physical, sexual, financial, emotional, or so-called 'honour' based violence.” -‘Honour’ based violence refers to an honour code set at the discretion of male relatives and the punishing of women for bringing shame on the family when they do not abide by the ‘code’. Infringements may include rejecting a forced marriage, pregnancy outside of marriage, seeking divorce, inappropriate dress, and even kissing in a public place. -Men can also be victims, sometimes as a consequence of a relationship which is deemed to be inappropriate, if they are part of the LGBTQI community, have a disability, or if they have assisted a survivor.</p> <p>Financial/material – “Including theft, fraud, and coercion in relation to financial affairs such as, property or financial transactions”</p> <p>Modern Slavery- “Including slavery, human trafficking, forced labour and domestic servitude.” -Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Please also see section for Modern Slavery</p> <p>Neglect – “Including ignoring emotional or physical care needs, failure to provide access to appropriate healthcare or educational services, the withholding of life necessities such as food.”</p> <p>Organisational- This can happen through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.</p> <p>Physical – “Including assault, hitting, slapping, pushing, restraint, or inappropriate physical punishments.”</p> <p>Psychological – “Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or unreasonable and unjustified withdrawal of supportive networks”</p> <p>Sexual – “actual or threatened physical intrusion of a sexual nature, whether by force or under unequal conditions e.g. sexual assault, rape, indecent exposure, sexual photography, sexual teasing or innuendo.</p> <p>The above examples are not exhaustive, and an individual can raise concerns via the procedures laid out in this policy if they believe they have experienced sexual harassment, exploitation, or abuse.</p>
<p>Adult</p>	<p>An individual aged 18 or over</p>
<p>Adult at-risk</p>	<p>Someone over the age of 18 who, for physical, social, economic, environmental or other factors can be more vulnerable to abuse, exploitation or other harms including sexual abuse and exploitation. Given this definition, many people we work with in communities around the world would come under this definition. Recognising this we will work to ensure that this is an empowering rather than a dis-empowering term, and</p>

	<p>that we use it to work with communities to uphold the rights and dignity of those who may be at greater risk of abuse or exploitation.</p> <p>The term ‘Vulnerable Adults’ is often used interchangeably with ‘Adults at-risk’. We are choosing to use the phrase <i>at-risk</i> instead of describing individuals as <i>vulnerable</i>, as this can be a disempowering term if it suggests inherent vulnerability rather than reflecting on where this relates to systems of power.</p> <p>Safeguarding duties apply to an adult who:</p> <ul style="list-style-type: none"> -has needs for additional care and support -is experiencing, or at risk of experiencing, abuse or neglect -as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect
Child	<p>Any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood. This definition is in line with the <i>UN Convention on the Rights of the Child</i>. Whilst a person under the age of 18 may have reached the age of majority, age of sexual consent, or voting age, this does not alter their inherent vulnerability as a child.</p>
Child abuse	<p>All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. The main categories of abuse are defined by WHO as physical abuse; sexual abuse; psychological abuse; and neglect.</p> <p><u>Physical</u> abuse can include inappropriate physical punishments towards a child, and/or assaulting, pushing, hitting, and slapping them.</p> <p><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.</p> <p><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.</p> <p><u>Neglect</u> can involve preventing access to education, food or other life necessities, and any emotional or physical care needs. Whatever form it takes, neglect can be just as damaging to a child as physical abuse. Children are more susceptible to neglect given their inherent vulnerability and dependence on adults for support.</p> <p>It is common for a child that is abused to experience more than one type of abuse, and it often happens over a period of time rather than being a one-off event.</p>
Safeguarding	<p>The responsibility that organisations have to make sure their staff, operations, and programmes do no harm to anyone they come into contact with, and that they do not expose anyone to the risk of harm and abuse</p>
Sexual abuse	<p>ActionAid uses the definition outlined in the <i>UN Secretary General Bulletin’s on Protection from Sexual Exploitation and Abuse</i>: “actual or threatened physical intrusion of a sexual nature, whether by force or under unequal conditions e.g. sexual assault, rape.</p> <p>ActionAid strictly prohibits staff and other representatives from engaging in any kind of sexual activity with children (anyone under the age of 18 years, or older if the local law indicates this). Mistaken belief of age is no defence.</p>
Sexual exploitation	<p>ActionAid uses the definition outlined in the <i>UN Secretary General Bulletin’s on Protection from Sexual Exploitation and Abuse</i>: “any actual or attempted abuse of power or trust for sexual purposes, including, but not</p>

	<p>limited to, profiting commercially, monetarily, socially, or politically from the sexual exploitation of another”⁴</p> <p>This can represent a wide spectrum of examples including but not limited to invasion of someone’s sexual privacy, forced transactional sex, non-consensual filming of a sexual act or exposure of genitals, online grooming, or knowingly spreading a sexually transmitted disease or infection.</p> <p>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.</p>
Sexual harassment	<p>Sexual harassment is unwanted conduct of a sexual nature. It can happen to anyone regardless of gender, sexuality, race or any other factor. ActionAid recognises that different forms of discrimination overlap and intersect and that this exacerbates the risk of sexual harassment within marginalised and threatened groups such as women, people of colour, people with disabilities and people in the LGBTQI community.</p> <p>Sexual harassment can be directed towards one person, groups of people, or towards everyone, and can occur as a one-off incident or as a pattern of behaviour.</p> <p>Sexual harassment can be carried out with the effect of creating an intimidating, degrading, or offensive environment and/or to violate the dignity of another person.</p> <p>An action or behaviour can still be considered sexual harassment even if the alleged harasser didn't intend for it to be harmful. When addressing allegations of sexual harassment, ActionAid is concerned with the impact of the behaviours on the complainant, not the intention of the person accused.</p> <p>Sexual harassment can be physical, verbal, or non-verbal. Examples of this include, but are not limited to:</p> <ul style="list-style-type: none"> -Physical examples include touching, unwanted physical contact and assault (including attempts and threats) -Verbal examples include derogatory comments, jokes, questions about someone’s sex life, remarks about someone’s appearance -Non-verbal examples include sexual gestures, staring, and unwanted phone calls, letters, notes, and/or emails
OTHER RELEVANT TERMS	
Adolescent	<p>Adolescents are individuals aged between 10-19 years.</p> <p>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.</p> <p>Please also refer to <i>young person</i> definition.</p>
Child labour	<p>According to the International Labour Organization (ILO), child labour is defined as work that deprives children of their childhood, their potential and their dignity. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and interferes with their schooling by depriving them of the opportunity to attend school.</p> <p>Some countries have laws and policies that allow children to work. When considering whether such work amounts to child labour or not,</p>

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

	<p>consideration should be made to the national laws and policies of that country on child labour alongside the definition of the ILO. Should the ILO definition demand a higher standard than the national laws and policies, then the ILO definition shall take precedent.</p> <p>Reported child labour allegations will be handled with support from Protection colleagues.</p>
Child marriage	<p>A formal marriage or informal union involving someone aged under 18.</p> <p>The practice of marrying off young children is a form of sexual violence since the children, and particularly girls, involved are unable to give or withhold their consent.</p> <p>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.</p>
Child Protection	<p>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.”</p> <p>Child protection is part of wider safeguarding activities and refers to activities that are undertaken to protect specific children who are suffering or likely to suffer significant harm. This includes procedures which detail how to respond to concerns about a child. Please refer to definitions of <i>child safeguarding</i> and <i>safeguarding</i></p> <p>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.</p>
Child Safeguarding	<p>Child safeguarding is the action that is taken to promote the welfare of all children and protect them from harm. In practice it means:</p> <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 <p>taking action to enable all children and young people to have the best outcomes</p> <ul style="list-style-type: none"> -ensuring an organisation’s processes or procedures do not deliberately or inadvertently cause harm to children <p>Please also refer to <i>Safeguarding</i> definition and <i>Child Protection</i> definition</p>
Child sexual exploitation	<p>This can take the form of commercial and/or online sexual exploitation of children:</p> <ul style="list-style-type: none"> -Commercial sexual exploitation is sexual abuse enabled by a payment in cash or in-kind to the child or another person (or group of people). The commercial sexual exploitation of children is a form of coercion and is a form of modern slavery. -Online sexual exploitation covers any act of sexual exploitation towards a child that has at any point been carried out online. 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	<p>A person living in a community within which ActionAid operates, however, they are not necessarily engaged with any programmes.</p>

Complainant	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	The specific grievance of anyone who has been negatively affected by an individual's action towards them, or who believes that an organisation has failed to meet a stated commitment that is intended to keep them safe from harm. Individuals can make a complaint on behalf of someone else as a third party, even if they were not directly affected by the alleged harm.
Concern	The Global SHEA and Safeguarding Team uses this term to define SHEA and Safeguarding issues raised that are not, or not yet, a formal complaint. For example, a group of staff speaking about rumours they have heard about sexual exploitation in a refugee camp or in a particular office. It is vital that concerns raised are responded to as this is a critical way of ensuring survivors and complainants are listened to and ActionAid follows up on all issues as part of our commitment to creating safe working environments for all.
Convention on the Rights of the Child	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 organizational values and goals.
Digital Safeguarding	ActionAid recognizes the risk that staff/representatives could carry out online sexual harassment, exploitation, and abuse. ActionAid has a responsibility to protect staff and representatives (including partners, volunteers, contractors and others), community members, young people and children that it engages with on online spaces. <i>(For more guidance please refer to: ActionAid, Digital SHEA and Safeguarding Risks during ActionAid's COVID-19 Response, 2020)</i>
Female genital mutilation	<p>"Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons."</p> <p>FGM is recognised 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.</p> <p>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.</p>
Forced marriage	<p>Marriages in which one and/or both parties, whether adults or children, have not personally expressed their full and free consent to the union.</p> <p>Even if children express consent to a formal or informal union, the implication is that they are still underage and their consenting does not legalize child marriage.</p> <p>As is the case with child marriage more specifically, this is something ActionAid campaigns against given our human rights-based approach.</p>

Gender-based violence (GBV)	<p>“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”</p> <p>Acts of gender-based violence are a form of sexual abuse and can affect any stakeholder, whether staff or community members.</p> <p>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.</p>
Grooming	<p>Grooming is when an individual deliberately tries to gain a child’s trust for the purpose of carrying out sexual abuse or exploitation.</p> <p>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.</p> <p>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).</p>
Investigation	<p>A process designed to gather information in order to determine whether wrongdoing occurred and, if so, the persons responsible. At AAUK this will take the form of an internal fact-finding process. The decision will be based on the balance of probabilities rather than beyond all reasonable doubt</p>
Modern slavery	<p>Slavery is a situation where a person exercises perceived or real power of ownership over another person.</p> <p>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.</p> <p>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.</p>
Rights holder	<p>A rights holder is someone working directly with (e.g a programme participant) ActionAid or 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.</p>
SHEA and Safeguarding Focal Point	<p>A person within an organization designated to receive concerns and complaints of cases of sexual abuse, exploitation, and harassment. 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.</p>

Staff/Representatives	<p>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.</p> <p>This is not an exhaustive list and covers anyone who is a representative of ActionAid including individuals acting in the capacity of agents or implementing on behalf of representatives of ActionAid e.g. teachers working in the community schools through a partner’s project. ActionAid may not have the jurisdiction or expertise to take action on cases where individuals are not directly under ActionAid or partner authority, but will do everything it can to raise to relevant authorities and ensure any action undertaken by others has the child’s best interest at heart.</p>
Subject of concern	The person alleged to have carried out harm.
Survivor	<p>“...a person who has experienced sexual abuse, exploitation, or harassment.</p> <p>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.”</p> <p>AAI uses the term <i>survivor</i> as part of our survivor-centered approach as it emphasizes the power of the individual, which the term ‘victim’ can remove, and their agency. However, it is important that those affected by sexual harassment, exploitation and abuse can choose the term they prefer</p>
Survivor-centred approach	<p>“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.” 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.</p>
Trafficking	<p>Trafficking is a process of enslaving people, coercing them into a situation with no way out, and exploiting them.</p> <p>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. Trafficking is considered a human rights violation.</p>
Transactional sex	<p>This is the exchange of money, employment, goods, or services for sex, including sexual favours.</p> <p>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.</p> <p>ActionAid does not make judgement against rights holders or others who choose to take part in such transactions but recognises the</p>

	inherent unequal power dynamic and so prohibits staff and other representatives from exchanging money or anything else for sex.
Young people	ActionAid defines a young person as anyone between the ages of 15 and 24 years. We note that in some countries, the age of a young person goes up to the age of 30, and so these provisions will apply to those people in such contexts. It is helpful to distinguish between teenagers (13-19) and young adults (20-24) as ability to manage behaviours and experiences differs between the two age groups. Young people under the age of 18 are still defined as children under the UN Convention of the Rights of the Child and are protected as children under this policy. This recognizes that while a person under the age of 18 may be defined as a young person and may have reached the age of majority, age of consent or voting age in their countries there are still vulnerabilities that exist, particularly for children and young people from marginalized groups.

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

Appendix 4 SHEA and Safeguarding Risk Assessment template

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

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

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

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											