ActionAidUK
PSEAH AND SAFEGUARDING POLICY

actionaid



Latin America, Diana walks with her husband and three children on their journey from Santo Domingo, Ecuador to Bogotá, Colombia © Laura Rios/AAUK

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1. INTRODUCTION

1.1. Motivation & Context

AAUKAAUK UK (AAUK) is a member of the AAUK International Federation; a global justice federation working together to achieve social change, gender equality and to address the structural causes of poverty and injustice.

We focus our efforts on working with women, girls and their communities. We raise funds in the UK to support the work of AAUK Federation member countries who are working with partners, including social movements, youth networks and women's rights organisations. We also tackle the root causes of global inequality and injustice by influencing UK Government commitments and policies on a range of interlinked issues.

Central to this mission is our responsibility to prevent harm, protect rights, and uphold the dignity, safety, and wellbeing of all individuals with whom we work and engage.AAUK recognises that sexual exploitation, abuse and harassment, abuse of power, discrimination, and violence are rooted in structural inequalities, gender injustice, and unequal power relations. We acknowledge our heightened duty of care towards children, young people, adults at risk, Team Members, partners, and communities affected by poverty, conflict, displacement, and crisis. This Safeguarding Policy brings together AAUK's commitments relating to:

- Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)
- Child safeguarding
- Sexual Exploitation, Abuse and Harassment (SEAH) in the workplace
- Duty of care and safer programming
- Prevention of abuse of power

This Policy reflects AAUK's zero-tolerance approach to sexual exploitation, abuse, harassment, and other forms of harm arising from abuse of power or breach of trust. It affirms our commitment to survivor-centred, rights-based, trauma-informed, and feminist safeguarding principles. This Policy **must** be read in conjunction with AAUK's Code of Conduct and related safeguarding policies and protocols, which provide operational guidance, including: SEAH Incident Reporting and Case Management Protocol, Child Safeguarding Protocol, Partner, Movement and Community Engagement Protocol, Digital and online Safeguarding Protocol and other relevant organisational safeguarding protocols. These documents are considered complementary and **mandatory** for the effective implementation of this Policy.

1.2. Reference Frameworks, Standards and Regulations

This Policy is aligned with applicable legal and regulatory frameworks and reflects international good practice in safeguarding and protection from sexual exploitation, abuse and harassment.
AAUK commits to complying with applicable laws and regulatory requirements in the countries in which we operate, as well as relevant donor requirements and inter-agency standards.
Key reference frameworks include:

- Core Humanitarian Standard on Quality and Accountability (CHS)[1]
- Inter-Agency Standing Committee (IASC) guidance on PSEAH[2]
- The International Child Safeguarding Standards by Keeping Children Safe[3]
- Applicable national legal and regulatory frameworks
- Donor safeguarding requirements and contractual obligations
- Relevant international human rights standards

AAUK commits to periodically reviewing and updating this Policy, related Protocols, and implementation mechanisms at least every three years, or more frequently where required by changes in regulatory requirements, organisational learning, or operational context.

[1] CHS 2024 PSEAH Index | CHS Alliance
[2] IASC Minimum Operating Standards - Protection from Sexual Exploitation and Abuse by own Personnel | IASC
[3] Child Safeguarding Resource library - Keeping Children Safe

2. PURPOSE & SCOPE OF THE POLICY

2.1. Policy Purpose

The purpose of this Policy is to:

- Prevent sexual exploitation, abuse & harassment, abuse of power & other safeguarding harms
- Protect children, young people, adults at risk, Team Members, and communities from harm
- Promote safe, inclusive, respectful, and accountable working and programming environments
- Establish a clear framework for safeguarding accountability, governance, and risk management
- Support culture of prevention, early identification of risks & appropriate response to concerns
- Ensure alignment with international safeguarding standards, legal and donor requirements

2.2. Scope of Application

This Policy applies to all AAUK **Team Members**, defined as individuals engaged with or representing AAUK in any capacity, whether paid or unpaid, including board and assembly members, trustees, employees, volunteers, interns, consultants, contractors, and secondees, regardless of location, duration, or contractual arrangement.

External stakeholders engaged with AAUK, including partners, consultants, contractors, vendors, service providers, movements, media representatives, and downstream partners, are expected to comply with this Policy or demonstrate that they maintain safeguarding standards equivalent to or higher than those set out herein.

This Policy applies across all organisational activities, including programmes, campaigns, advocacy, research, communications, fundraising, partnerships, and operational functions. It covers conduct and interactions occurring in physical, digital, and virtual environments, including online engagement and remote working contexts. This Policy addresses safeguarding risks and harms affecting children, adults at risk, community members, rights holders, Team Members, and others who may be impacted by AAUK's work. This includes, but is not limited to sexual exploitation, abuse and harassment (SEAH), abuse of power, gender-based violence, discrimination and harassment, harmful practices, risks arising in digital or online environments.

Safeguarding is a shared organisational responsibility across all teams and functions. Certain safeguarding concerns may also require coordinated response with other organisational functions, such as programme teams, People and Culture (Human Resources), partnerships teams, or risk and compliance functions, depending on the nature of the concern. Implementation of this Policy is supported by **mandatory** protocols and procedures providing operational guidance on the prevention, identification, reporting, and management of safeguarding concerns, to ensure effective implementation.

2.3. Definitions

For the purposes of this Policy:

PSEAH

Protection from **Sexual Exploitation, Abuse and Harassment** (PSEAH) refers to measures taken to prevent and respond to sexual exploitation, sexual abuse, and sexual harassment perpetrated by Team Members or associated personnel, including in relation to crisis-affected populations, programme participants, partners, or colleagues.

SAFEGUARDING

The responsibility of organisations to ensure their Team Members, operations, programmes, and partnerships do not cause harm to individuals or communities, and to prevent and respond appropriately to abuse, exploitation, harassment, and other safeguarding risks.

- **"Team Members"** Refers to all individuals engaged with or representing AAUK in any capacity, whether paid or unpaid, and regardless of location, type, or duration of engagement. This includes employees, volunteers, interns, consultants, contractors, secondees, trustees, board and assembly members, and any other individuals acting on behalf of AAUK or under its authority. The term encompasses individuals engaged on a full-time, part-time, temporary, fixed-term, or contractual basis, including those working at global, regional, national, or local level.

For further information on terminology used in this Policy, please refer to: Appendix 8.1: Acronyms & Appendix 8.2: Glossary of Terms.

3. POLICY STATEMENT & POSITIONS

3.1. Policy Statement

Policy Statement

ActionAidUK has zero tolerance for sexual exploitation, abuse and harassment, and for all forms of safeguarding harm, including abuse of power. Safeguarding is a core organisational responsibility and a condition of engagement for all Team Members, partners, and representatives acting on behalf of ActionAidUK. ActionAidUK expects all Team Members and partners to uphold the highest standards of ethical conduct, prevent abuse of power, and actively protect the rights, dignity, safety, and wellbeing of all individuals who come into contact with ActionAidUK through its work.

Safeguarding is integral to AAUK's duty of care and accountability to rights holders, communities, children, young people, adults at risk, Team Members, and partners. AAUK recognises that safeguarding harms are often rooted in unequal power relations, including gender inequality and other structural inequalities, and is committed to addressing both individual misconduct and the systemic factors that enable harm. In line with the Inter-Agency Standing Committee (IASC) Six Core Principles relating to Protection from Sexual Exploitation and Abuse[4], AAUK strictly prohibits sexual activity with children, any form of transactional sex, abuse of position or power for sexual or personal gain, and retaliation against individuals who raise safeguarding concerns. All Team Members have a duty of care to raise safeguarding concerns and to cooperate with safeguarding processes in accordance with this Policy.

As a member of the Core Humanitarian Standard (CHS) Alliance, AAUK is committed to strengthening accountability to affected populations and ensuring that its programmes, operations, and relationships do not cause harm. AAUK works to ensure that safeguarding risks are proactively identified, prevented, and addressed, and that Team Members are supported to carry out their roles safely, respectfully, and competently. AAUK commits to:

- Preventing safeguarding harm through risk-informed and preventative approaches
- Responding promptly, safely, and appropriately to safeguarding concerns
- Ensuring fair, transparent, and proportionate processes to address misconduct
- Supporting survivors through survivor-centred, rights-based, and trauma-informed approaches

[4] Secretary-General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse | UNHCR

- Addressing unequal power relations and discriminatory norms that contribute to abuse
- Promoting safe, inclusive, and enabling environments across physical, digital, and virtual contexts
- Strengthening organisational learning and accountability in safeguarding practice

ActionAidUK will not tolerate sexual exploitation, abuse, harassment, or other safeguarding harms, including deliberate failure to act, concealment of concerns, or retaliation against individuals who report concerns in good faith. Appropriate disciplinary, contractual, or legal action may be taken where breaches of this Policy occur.

3.2. Core Policy Positions

AAUK maintains the following core policy positions, which apply to all Team Members, as defined in this Policy:

- Team Members must not engage in any form of abusive, exploitative, discriminatory, or harmful behaviour towards rights holders, community members, partners, or adults at risk.
- Team Members must not engage in sexual activity or relationships with rights holders or adults at risk where there is an inherent power imbalance or risk of exploitation.
- Team Members must not engage in, facilitate, or promote any form of abuse, exploitation, neglect, or harmful practice affecting children.
- Team Members must not engage in any form of sexual activity with a child (any person under the age of 18 years, or older where national law defines a higher age). Mistaken belief regarding age is not a defence.
- Team Members must not engage in any form of sexual exploitation, sexual abuse, or sexual harassment towards any individual encountered through their work.
- Team Members must not engage in sexual or romantic relationships with individuals whom they line manage, supervise, or over whom they exercise direct decision-making authority or influence. For senior leaders, this prohibition extends to relationships with more junior Team Members where a power imbalance exists.
- Recognising power imbalances inherent in funding relationships, partnerships, and programme delivery, Team Members must not engage in sexual relationships with staff of partner organisations where such relationships may constitute, or could reasonably be perceived as, coercive, exploitative, or an abuse of power or position.
- Team Members are expected to disclose relationships that may create actual, perceived, or potential safeguarding or conflict of interest concerns, in line with applicable organisational procedures.
- Team Members must not purchase sex or exchange money, employment, goods, services, or assistance for sexual activity. This prohibition reflects the increased risk of abuse of power and sexual exploitation within humanitarian and development contexts and aligns with the IASC Six Core Principles on Protection from Sexual Exploitation and Abuse.
- Safeguarding and PSEAH principles **must** be integrated across all areas of AAUK's work, including programmes, partnerships, operations, workplaces, and physical, digital, and virtual environments.

3.3. Consequences of Policy Breach

POLICY BREACH CONSEQUENCES

Breaches of this Policy constitute serious misconduct and will be addressed through appropriate disciplinary, contractual, or legal measures, in accordance with applicable procedures and legal requirements. Disciplinary measures may include corrective action, suspension, termination of employment or engagement, or other appropriate action, depending on the nature and severity of the breach.

Sexual exploitation, sexual abuse, and sexual harassment by Team Members constitute serious misconduct. Failure to comply with safeguarding responsibilities under this Policy may result in disciplinary, contractual, or other appropriate corrective action. Where legally required, and where it is assessed as safe and appropriate, AAUK may refer matters to relevant authorities or pursue legal action, in line with survivor-centred and do-

no-harm principles, confidentiality obligations, and applicable safeguarding and legal frameworks. AAUK is committed to applying this Policy consistently and fairly to maintain trust, accountability, and integrity in all aspects of its work.

4. POLICY PRINCIPLES & VALUES

AAUK's safeguarding approach is grounded in international human rights law, feminist principles, and humanitarian protection standards. AAUK recognises that sexual exploitation, abuse and harassment, and other forms of safeguarding harm are rooted in unequal power relations, including gender inequality, discrimination, and structural injustice. AAUK acknowledges that gendered forms of violence disproportionately affect women and girls, while also recognising the impact on boys, men, transgender, non-binary, and gender-diverse individuals. AAUK is committed to working with marginalised, oppressed, and underserved groups, including people living in poverty, individuals from diverse sexual orientations and gender identities (including LGBTQI communities), persons with disabilities, and individuals affected by discrimination based on ethnicity, religion, race, class, or other characteristics.

AAUK applies an intersectional feminist approach, recognising that individuals experience multiple and overlapping forms of inequality and exclusion. Safeguarding measures aim to prevent harm, address structural discrimination, and promote inclusive, safe, and equitable participation for all individuals engaged in or affected by AAUK's work. The following guiding principles apply across all safeguarding activities:

4.1. Zero Tolerance

AAUK applies a zero-tolerance approach to sexual exploitation, abuse and harassment, and all forms of safeguarding harm, including abuse of power. No position of authority provides immunity, no context justifies harm, and all safeguarding concerns **must** be taken seriously and addressed in accordance with this Policy and **mandatory** protocols. Zero tolerance means that AAUK will act on safeguarding concerns, promote accountability, and take appropriate disciplinary, contractual, or legal action where breaches occur, in line with survivor-centred and do-no-harm principles.

4.2. Do No Harm

AAUK is committed to the principle of Do No Harm across all programmes, partnerships, and operations. This includes proactively identifying and mitigating safeguarding risks, preventing unintended negative consequences, ensuring responsible use of power, and adapting safeguarding approaches to local contexts and evolving risks. Safeguarding considerations are integrated into programme design, decision-making, partnerships, and organisational practices to reduce vulnerability and strengthen protective environments.

4.3. Survivor-Centred and Trauma-Informed Approach

AAUK adopts a survivor-centred approach that places the rights, dignity, safety, and wellbeing of individuals affected by safeguarding harm at the centre of all actions and decisions. Survivors are recognised as rights holders with agency and the right to make informed choices about if, when, and how they engage with reporting and response processes. AAUK is committed to respecting confidentiality, informed consent, and the wishes of survivors, and to ensuring that engagement with safeguarding processes does not result in further harm, stigma, or discrimination. A trauma-informed approach recognises the impact of trauma and integrates this understanding into organisational policies, protocols, and interactions. AAUK seeks to avoid re-traumatisation by ensuring responses are sensitive, respectful, and adapted to the needs of survivors. Operational guidance on survivor support, referrals, and incident management is further detailed in the relevant safeguarding protocols.

4.4. Child Rights and Best Interests of the Child

AAUK recognises children and young people as rights holders and is committed to upholding the principles of the Convention on the Rights of the Child[5], including the best interests of the child, the right to protection from harm, and the right to participate in decisions affecting them. AAUK promotes child-safe environments, child-friendly reporting mechanisms, and additional safeguards for children at heightened risk of harm. Child safeguarding measures prioritise the dignity, safety, privacy, and wellbeing of children and aim to prevent stigma, discrimination, or further harm. Further guidance is provided in the Child Safeguarding Protocol.

4.5. Gender Equality and Feminist Leadership

Safeguarding is integral to AAUK's commitment to feminist leadership and gender justice. AAUK challenges unequal power relations, promotes bodily autonomy and gender equality, and addresses gender-based violence and discrimination. Safeguarding approaches are inclusive and intersectional, recognising how gender inequality intersects with other forms of marginalisation and exclusion.

4.6. Accountability to Affected Populations

AAUK is accountable to the individuals and communities with whom it works. Safeguarding systems support accessible, confidential, and safe reporting mechanisms and promote meaningful participation of affected individuals in safeguarding design, monitoring, and learning processes. AAUK promotes transparency, responsiveness, and continuous improvement in safeguarding practice, in line with commitments to accountability to stakeholders and organisational learning.

4.7. Inclusion and Non-Discrimination

AAUK is committed to inclusive safeguarding that recognises how vulnerability may be shaped by intersecting factors including gender, age, disability, sexual orientation, gender identity, ethnicity, religion, migration status, poverty, conflict, or displacement. Safeguarding systems are designed to be accessible, culturally responsive, and appropriate to diverse contexts, ensuring that no individual is excluded from protection due to discrimination, stigma, or legal status.

4.8. Legal and Donor Compliance

AAUK is committed to complying with applicable safeguarding laws, international human rights standards, donor requirements, and inter-agency safeguarding frameworks. Safeguarding compliance is a condition of employment, partnership, funding, and organisational accountability. AAUK will meet reporting obligations to donors, regulators, and relevant authorities, in accordance with applicable legal requirements and organisational procedures, including the Donor Reporting Standard Operating Procedures. Implementation may be adapted to local legal and operational contexts provided such adaptations remain consistent with the minimum safeguarding standards and principles established in this Policy. Country Directors, supported by relevant safeguarding and risk management functions, are responsible for ensuring appropriate reporting and coordination with the ActionAid International Global SEAH and Safeguarding Team, where required.

5. PREVENTION AND SAFE ENVIRONMENTS

AAUK is committed to creating and maintaining safe, inclusive, and respectful working environments across all areas of its work. Safeguarding is embedded within organisational culture, leadership, programmes, partnerships, and operational practices, recognising that prevention of harm requires proactive and continuous attention to power dynamics, risks, and accountability.

[5] The United Nations Convention on the Rights of the Child

5.1. Organisational Structures

AAUK ensures that organisational structures, systems, and practices actively prevent, identify, and respond to risks of sexual exploitation, abuse and harassment (SEAH) and other safeguarding harms. Safeguarding is recognised as a core organisational priority and risk management area, integrated across programmes, partnerships, workplaces, humanitarian response, advocacy, and digital engagement. Misconduct is recognised as both an organisational and programmatic risk. Internal misconduct may indicate wider safeguarding risks and **must** be addressed promptly and appropriately. Failure to prevent or respond to safeguarding concerns undermines organisational integrity, accountability to affected populations, and trust with partners and donors. Safeguarding responsibilities are embedded within governance, risk management, internal controls, and assurance mechanisms, in alignment with AAUK's feminist principles, Code of Conduct, and duty of care obligations.

5.2. Programme Cycle

Safeguarding and prevention of SEAH are integrated throughout the programme cycle, including programme design, implementation, monitoring, evaluation, and closure. Safeguarding considerations form part of programme quality, ethical practice, and risk management across development, humanitarian, advocacy, and research activities. Programmes **must** assess context-specific safeguarding risks, particularly in fragile, conflict-affected, or humanitarian settings, and ensure appropriate mitigation measures are applied. Learning from safeguarding practice is integrated into organisational monitoring, evaluation, and learning processes to strengthen continuous improvement. Responsibilities at programme closure **must** ensure that outstanding safeguarding concerns, risks, or mitigation measures are appropriately addressed or transitioned.
Further guidance is provided in the Partners, Movement and Community Engagement Protocol.

5.3. Intersectional and Feminist Approach

AAUK applies an intersectional feminist approach to safeguarding, recognising that SEAH and safeguarding harms are often rooted in gender inequality, discrimination, and unequal power relations. Safeguarding systems **must** be inclusive, culturally responsive, and accessible to individuals of diverse genders, sexual orientations, identities, abilities, ages, and social backgrounds. Particular attention is given to individuals who may face heightened risk of harm, including persons with disabilities, displaced populations, older persons, and individuals experiencing social or economic marginalisation. Safeguarding approaches aim to promote dignity, participation, safety, and respect, and to ensure individuals can raise concerns without fear of stigma, discrimination, or retaliation. Further guidance is available in AAUK's Feminist Research Guidance.

5.4. Working with Children

Safeguarding responsibilities extend to all programmes and activities involving children and young people, with additional safeguards to protect their rights, dignity, safety, and wellbeing. Programmes involving children **must** promote safe participation, empowerment, and age-appropriate engagement, ensuring that children understand their rights and know how to raise concerns in ways appropriate to their age and context. Activities **must** consider children's evolving capacities and must not expose children to harm, interfere with education, or contravene applicable laws or child protection standards. Children and young people have the right to refuse participation and withdraw consent at any stage. Additional guidance is provided in the Child Safeguarding Protocol.

5.5. Safe Environments

All Team Members share responsibility for maintaining environments free from SEAH and safeguarding harm. Team Members **must** uphold AAUK's values, Code of Conduct, and safeguarding standards, and contribute to safe, respectful, and inclusive environments across all areas of work. Team Members are expected to raise safeguarding concerns through established reporting mechanisms, cooperate with safeguarding processes, and respect confidentiality requirements. AAUK is committed to ensuring that appropriate support is available to individuals affected by safeguarding harm, in line with survivor-centred principles.

5.6. Partnerships

Safeguarding is a shared responsibility across partnerships and forms part of AAUK's accountability to affected populations. AAUK requires partners, movements, contractors, and vendors to uphold safeguarding standards consistent with this Policy and the Code of Conduct.

Safeguarding requirements **must** be integrated into partnership agreements, due diligence processes, and contractual arrangements. Partnership arrangements **must** include proportionate safeguarding expectations, reporting obligations, and cooperation requirements in line with applicable procedures and agreements. AAUK promotes mutual accountability, capacity strengthening, and continuous learning with partners, and will take appropriate corrective action where safeguarding standards are not met. Further guidance is provided in the Partners, Movement and Community Engagement Protocol.

5.7. Safer Recruitment

Safer recruitment and people management practices are applied throughout the employment lifecycle to reduce safeguarding risks and promote safe organisational culture. Recruitment and selection processes assess alignment with organisational values, safeguarding responsibilities, and ethical conduct expectations. Safeguarding responsibilities are integrated into induction, performance management, supervision, and exit processes. Where standard recruitment checks are limited by context, appropriate risk mitigation measures will be applied. AAUK is committed to strengthening safeguarding culture through induction, training, and ongoing capacity development for Team Members and partners. AAUK may prohibit the recruitment, re-engagement, or redeployment of individuals found to have committed safeguarding violations, in line with applicable legal requirements and organisational procedures. AAUK is participating in the Misconduct Disclosure Scheme and undertakes criminal record and other checks for risk assessed roles. Further guidance is provided in AAUK recruitment policies and protocols.

5.8. Complaints Mechanisms

In line with CHS Commitment 5, AAUK ensures that complaints and feedback mechanisms are safe, accessible, confidential, and responsive. Accessible complaints mechanisms are essential to maintaining safe working environments and ensuring accountability to affected populations. AAUK supports community-based complaints mechanisms designed in consultation with communities, including child-friendly and accessible approaches for persons with disabilities and other groups who may face barriers to reporting. Multiple reporting options are made available to enable individuals to raise concerns safely and confidentially. AAUK applies survivor-centred and do-no-harm principles in all safeguarding responses. Further guidance is provided in the SEAH Incident Reporting and Case Management Protocol.

5.9. Online Safety

Safeguarding applies to digital and online environments. AAUK is committed to ensuring that digital engagement is safe, inclusive, and respectful of rights, recognising the specific risks faced by children, young people, women, human rights defenders, and marginalised groups in online spaces. Safeguarding considerations are integrated into digital tools, platforms, communications, and engagement activities. Awareness raising, responsible digital practices, and ongoing learning support safe participation in online environments. Further guidance is provided in the Digital Safeguarding Protocol.

6. RAISING CONCERNS & SEEKING SUPPORT



Poland, Warsaw — Conflict Kitchen, a social initiative promoting skills development for Refugees and migrants. © AAUK UK

SEAH and Safeguarding Reporting Pathways

Survivors and complainants may raise concerns safely and confidently using any appropriate channel, including phone, email, or in person, and may choose any trusted individual or mechanism.

Reporting Channels

- People and Culture Team
- Line Manager
- Country Executive Director
- SEAH & Safeguarding Focal Point
- ActionAid whistleblowing mechanism
- Community-level channels
- Other Feedback & Complaint Mechanism

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Mandatory Escalation

All concerns should be raised to **ActionAid International Global SEAH & Safeguarding Team**
safeguarding@actionaid.org | Within 24 hours

actionaid

6.1. SEAH and Safeguarding Reporting Pathways

AAUK is committed to ensuring that all safeguarding concerns, including Sexual Exploitation, Abuse and Harassment (SEAH), can be raised safely, confidentially, and without fear of retaliation. Concerns may be raised by survivors, complainants, witnesses, Team Members, partners, or any individual acting in good faith, including where information is incomplete, uncertain, or requires further assessment. Reporting mechanisms **must** be accessible, culturally appropriate, inclusive, and responsive to the needs, preferences, and best interests of affected individuals and communities. AAUK applies a survivor-centred and do-no-harm approach, ensuring respect, dignity, confidentiality, and informed choice throughout the reporting process. AAUK is committed to ensuring that safeguarding concerns are managed in ways that prioritise safety, protection from retaliation, confidentiality, and respect for survivor choice.

6.2. Reporting Channels

Safeguarding concerns may be raised through any trusted and appropriate channel, including in person, by telephone, or by email:

- People and Culture / Human Resources representative
- Line Manager
- Country Director or designated senior management
- ActionAid International Global SEAH and Safeguarding Team (safeguarding@actionaid.org)
- AAUK PSEAH and Safeguarding Focal Point (uk.safeguarding@actionaid.org)
- ActionAid International whistleblowing mechanisms (whistleblowing@actionaid.org)
- AAUK whistleblowing mechanisms (uk.whistleblowing@actionaid.org)
- Community-level reporting mechanisms
- Other feedback and complaints mechanisms

Concerns raised through governance channels **must** be referred promptly to the appropriate safeguarding reporting mechanisms. AAUK promotes multiple accessible reporting pathways, including community-based and locally appropriate mechanisms, recognising that barriers to reporting may arise from power imbalances, stigma, discrimination, fear of retaliation, or other contextual risks. Individuals may choose the reporting option they consider safest and most appropriate.

6.3. Escalation and Global Oversight

To ensure accountability, consistency, and appropriate safeguarding support, any Team Member or representative who receives or becomes aware of a safeguarding concern **must** ensure that the concern is escalated to the ActionAid International Global SEAH and Safeguarding Team within 24 hours: **safeguarding@actionaid.org**. Global oversight supports coordinated safeguarding response, quality assurance, risk management, and organisational learning, while respecting confidentiality and the safety and dignity of all individuals involved. Safeguarding concerns will be assessed and managed through fair, proportionate, and confidential processes in line with applicable safeguarding procedures. Reports may also be made anonymously through available reporting channels. While anonymous reports may limit ActionAid's ability to follow up or investigate fully, all concerns will be reviewed and handled in line with safeguarding principles, confidentiality requirements, and a survivor-centred approach. Where required, safeguarding concerns will be communicated, escalated, and reported in line with applicable legal, regulatory, donor, contractual, and organisational obligations, including coordination with relevant internal functions responsible for safeguarding oversight, external communications, risk management, confidentiality, and data protection.

6.4. Duty to Report and Survivor Choice

All Team Members have a duty of care to promptly report any safeguarding concern, suspicion, or allegation arising through their work with AAUK, in line with this Policy and the Code of Conduct. Reporting is required even where information is incomplete or uncertain, and proof is not required to raise a concern. However, in line with a survivor-centred approach, individuals who experience harm are not required or obliged to make

a report. Survivors have the right to decide if, when, and how they disclose their experience, and whether they wish AAUK to take further action. AAUK will respect survivors' autonomy, wishes, safety, dignity, and confidentiality at all times, within the limits of legal and safeguarding obligations. Members of the public, partners, and other stakeholders may also raise safeguarding concerns through the reporting channels listed above. Where concerns relate to individuals or contexts beyond AAUK's direct authority, AAUK will consider appropriate referral to relevant external services or authorities, prioritising the safety, rights, and best interests of survivors. Further guidance is available in the SEAH Incident Reporting and Case Management Protocol and Whistleblowing Policy.

6.5. Protection from Retaliation

AAUK prohibits any form of retaliation against any individual who raises a safeguarding concern or participates in a reporting, assessment, or investigation process in good faith. Retaliation includes any act of intimidation, discrimination, harassment, coercion, threatening behaviour, victimisation, or adverse treatment that may discourage reporting, compromise wellbeing, or negatively affect a person's employment, engagement, or relationship with AAUK. Protection from retaliation applies to survivors, complainants, witnesses, Team Members, partners, and any other individuals involved, or believed to be involved, in a safeguarding concern, regardless of whether the concern is reported formally, informally, openly, or anonymously. Any Team Member or representative found to have engaged in retaliatory behaviour will be subject to disciplinary action, which may include termination of employment or engagement, in accordance with applicable procedures. AAUK also promotes a culture of psychological safety, early advice-seeking, and respectful challenge to support safe reporting and safeguarding accountability.

Allegations of retaliation will be treated as a serious breach of this Policy and managed in line with the SEAH Incident Reporting and Case Management Protocol. ActionAidUK is committed to fostering a safe, respectful, and accountable environment in which concerns can be raised without fear of reprisal.

6.6. Confidentiality and Data Protection

AAUK is committed to protecting the confidentiality, dignity, privacy, and safety of survivors, complainants, witnesses, subjects of complaint, Team Members, and all individuals involved in safeguarding processes. Confidentiality is a core component of ActionAid's survivor-centred, rights-based, and trauma-informed approach and is essential for building trust, enabling safe disclosure, and preventing further harm. AAUK will seek to ensure that appropriate support, advice, and referral mechanisms are available for individuals involved in safeguarding processes, in line with safeguarding procedures, wellbeing considerations, and available resources. Information relating to safeguarding concerns, including Sexual Exploitation, Abuse and Harassment (SEAH) and child safeguarding, will be handled sensitively and shared strictly on a need-to-know basis. Access to information will be limited to authorised individuals with a legitimate role in ensuring safety, support, accountability, or oversight, and only to the extent necessary to fulfil those responsibilities.

AAUK will comply with applicable local, national, and international data protection and privacy laws, as well as relevant donor and inter-agency standards, when collecting, storing, processing, using, or sharing personal data. Personal data will be managed in accordance with AAUK's Data Protection policies and safeguarding-specific protocols issued by the Global SEAH and Safeguarding Team, including guidance on secure storage, controlled access, retention, and safe disposal of information. Confidentiality may be limited where there is a lawful or ethical obligation to disclose information to prevent serious harm, protect a child or adult at risk, or comply with legal or regulatory requirements. In such circumstances, AAUK will ensure that any information sharing is proportionate, necessary, and limited to the minimum required, with due consideration given to the safety, wellbeing, dignity, and rights of the individuals concerned.

Any breach of confidentiality or misuse of personal data that compromises the safety or rights of individuals, undermines safeguarding processes, or violates ActionAidUK's policies and values will be treated as serious misconduct and may result in disciplinary action.

7. IMPLEMENTATION & CREATING CULTURE

7.1. The Roles and Responsibilities

Safeguarding is a core organisational risk and strategic priority for AAUK, embedded within leadership, governance, risk management, and accountability systems. AAUK maintains clear lines of responsibility across governance, management, and operational functions to ensure safeguarding risks are identified, prevented, mitigated, and addressed in a timely, ethical, and survivor-centred manner.

All Team Members share responsibility for upholding this Policy, promoting safe conduct, preventing abuse of power, and contributing to a culture of dignity, respect, inclusion, and accountability. Safeguarding responsibilities are integrated into organisational culture, leadership, decision-making, programme design and delivery, partnerships, risk management processes, internal control mechanisms, and audit and assurance functions. Senior leadership and governance bodies are responsible for ensuring appropriate oversight of safeguarding risks, allocation of adequate resources, and effective implementation of safeguarding measures across all areas of work. Safeguarding considerations are integrated into organisational risk management, compliance, audit, and assurance processes to support accountability and continuous improvement.

All Team Members must not:

- Engage in any form of sexual exploitation, abuse, harassment, or other abuse of power
- Create, contribute to, or tolerate environments that undermine the dignity, safety, wellbeing, or rights of others
- Discourage, obstruct, or knowingly provide false or misleading information in relation to safeguarding concerns or reporting processes
- Misuse positions of power, authority, influence, or trust
- Ignore, minimise, conceal, or deliberately fail to act upon safeguarding risks within their area of responsibility

Safeguarding governance arrangements operate across global, regional, and country levels, with oversight, escalation, and implementation responsibilities aligned to organisational structures, applicable procedures, and safeguarding protocols. A summary of key PSEAH and safeguarding responsibilities across governance, management, and operational functions is provided below.

Key PSEAH and Safeguarding Roles and Responsibilities

ROLE	KEY PSEAH AND SAFEGUARDING RESPONSIBILITIES
All Team Members	Uphold the Code of Conduct; treat others with dignity and respect; prevent harm; embed Safeguarding into their work identify and report safeguarding concerns; contribute to safe, respectful and inclusive environments; complete mandatory safeguarding training
Line Managers	Promote safe team culture where PSEAH and safeguarding is embedded; ensure Team Members understand safeguarding responsibilities and reporting mechanisms; ensure safeguarding risks are identified and mitigated; prioritise PSEAH awareness raising for themselves and their teams; support safer recruitment practices; respond appropriately to poor practice, negative behaviours and concerns raised; complete mandatory safeguarding training for people managers
Senior Leadership (Country Directors / Executive Directors)	Hold overall accountability for this policy and its implementation; ensure implementation of safeguarding measures; allocate adequate resources; oversee safeguarding risk management; ensure reporting mechanisms are accessible and effective; promote organisational accountability and culture
Board and Governance Bodies	Provide strategic oversight of safeguarding risk; ensure safeguarding is integrated into organisational risk management frameworks; review safeguarding assurance information; promote accountability, transparency, and ethical leadership; ensure regular safeguarding

ROLE	KEY PSEAH AND SAFEGUARDING RESPONSIBILITIES
	oversight and reporting arrangements, including the appointment of designated Board-level safeguarding leadership or focal point functions,.
People and Culture / Human Resources	Embed safeguarding into recruitment, induction, performance management, disciplinary processes, and organisational culture; support safe people management practices; People and Culture and safeguarding functions will work collaboratively in line with applicable safeguarding and incident management procedures.
PSEAH and Safeguarding Focal Points	Promote and help embed safeguarding policies, protocols and practices across programmes, partnerships, and operations; provide guidance on reporting pathways and safeguarding requirements; support awareness raising, training, and local implementation efforts; receive and escalate concerns in line with procedures; and liaise with the Global SEAH and Safeguarding Team on safeguarding coordination, risk management, and organisational learning
Global SEAH and Safeguarding Team	Provide technical guidance and quality assurance; support safeguarding investigations; monitor safeguarding risks and trends; strengthen organisational safeguarding systems; promote learning and continuous improvement
Partners and Implementing Entities	Uphold safeguarding standards consistent with partnership agreements; report safeguarding concerns; cooperate with safeguarding processes; contribute to safe programme environments

7.2. Training and Development

AAUK is responsible for ensuring that all Team Members receive appropriate safeguarding induction, training, and ongoing learning opportunities to support the effective implementation of this Policy and promote safe, respectful, and inclusive environments. All Team Members **must** complete safeguarding induction at the start of their engagement, including awareness of this Policy, expected standards of conduct, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH), abuse of power, reporting responsibilities, and survivor-centred approaches. Safeguarding training **must** be completed regularly, at a minimum every two years, and more frequently where required based on role, responsibilities, operational context, or level of safeguarding risk exposure.

AAUK will maintain appropriate systems to monitor and support completion of mandatory safeguarding induction and training requirements. Training and sensitisation activities may be delivered through in-person sessions, virtual learning, or other accessible formats appropriate to different roles and working environments. Training content **must** be proportionate and tailored to responsibilities and safeguarding risk exposure. Additional and specialised training **must** be provided to individuals with specific safeguarding responsibilities, including managers, People and Culture personnel, PSEAH and Safeguarding Focal Points, Safeguarding Stakeholder Panel members, investigators, and others involved in safeguarding risk management, incident response, or decision-making processes.

AAUK also commits to strengthening safeguarding capacity among partners, contractors, and entities implementing work on its behalf. This may include provision of guidance, awareness raising, training opportunities, and technical support, proportionate to identified safeguarding risks and partnership arrangements. Safeguarding learning and development activities will be informed by organisational risk assessments, programme context, monitoring findings, incident trends, and lessons learned, ensuring continuous improvement of safeguarding practice. AAUK promotes a culture of continuous learning, reflective

practice, and leadership accountability to strengthen safeguarding awareness, confidence, competence, behaviours, organisational capacity, and accountability in preventing harm and responding appropriately to safeguarding concerns in line with survivor-centred and do-no-harm principles.

7.3. Monitoring, Accountability and Learning

AAUK is committed to systematically monitoring implementation of this Policy, strengthening accountability, and promoting continuous organisational learning to prevent harm and improve safeguarding practice. Monitoring, evaluation, accountability, and learning processes support safe working environments, safer programmes, responsible use of power, and ethical organisational culture.

AAUK maintains proportionate and risk-based systems, internal controls, and assurance mechanisms to monitor compliance with this Policy across governance, management, programmes, partnerships, and operations, including, where appropriate, monitoring safeguarding compliance, training completion, and implementation responsibilities. These include clearly defined responsibilities, oversight arrangements, and risk management processes designed to prevent, detect, and respond to safeguarding risks, including Sexual Exploitation, Abuse and Harassment (SEAH).

Monitoring processes assess effectiveness of safeguarding measures and identify areas for improvement. This includes reviewing safeguarding concerns, allegations, incidents, near misses, and risk indicators, while respecting confidentiality and data protection requirements. AAUK uses qualitative and quantitative information including information relating to reporting trends, organisational culture, confidence in reporting mechanisms, and safeguarding effectiveness from multiple sources, including complaints and feedback mechanisms, programme monitoring, safeguarding case management data, staff and partner reflections, internal reviews, and external evaluations, to identify systemic risks, power imbalances, and opportunities for strengthening safeguarding practice. Safeguarding monitoring and evaluation processes **must**:

- Be safe, ethical, inclusive, and accessible to affected individuals and stakeholders, including children, persons with disabilities, older persons, and others at heightened risk of harm
- Respect confidentiality, dignity, and informed consent
- Minimise risk of retaliation, stigma, or unintended harm
- Be culturally appropriate, gender-responsive, and trauma-informed
- Reflect survivor-centred and do-no-harm principles

Learning from safeguarding practice is used to:

- Strengthen safer programming and community engagement
- Improve safeguarding leadership, awareness, and professional practice
- Identify and address systemic risks and power imbalances
- Adapt approaches in response to evolving risks, operational contexts, and emerging evidence
- Support country-level ownership while maintaining alignment with global safeguarding standards
- Strengthen accountability to affected populations and stakeholders

Monitoring, accountability, and learning contribute to a culture of transparency, reflection, and collective responsibility, supporting continuous improvement of safeguarding systems across the organisation. AAUK may develop additional guidance, tools, and implementation resources to support practical application of safeguarding requirements across different operational contexts.

ORGANISATIONAL ACCOUNTABILITY AND CORRECTIVE ACTION

Where monitoring, assurance, or oversight activities identify significant concerns regarding implementation of this Policy by an ActionAid entity, appropriate Global Secretariat functions, including the Global SEAH and Safeguarding Team, will work with the relevant entity to support timely corrective action and strengthen safeguarding capacity. Significant or persistent implementation concerns may be escalated through the Federation's established governance and assurance mechanisms in line with the Federation Assurance Framework.

8. APPENDICES

8.1. Acronyms

ACRONYM	MEANING
AA	ActionAid
AAI	ActionAid International
AAP	Accountability to Affected Populations
AAUK	ActionAid UK
CHS	Core Humanitarian Standard on Quality and Accountability
GBV	Gender-Based Violence
HR	Human Resources
IASC	Inter-Agency Standing Committee
LGBTQI	Lesbian, Gay, Bisexual, Transgender, Queer and Intersex
PSEAH	Protection from Sexual Exploitation, Abuse and Harassment
SEAH	Sexual Exploitation, Abuse and Harassment
SOP	Standard Operating Procedure
UNCRC	United Nations Convention on the Rights of the Child

8.2. Glossary of Terms

TERM	DEFINITION
Abuse of power	Misuse of authority, position, influence, or trust for personal, sexual, financial, political, or social gain, including to exploit, harm, manipulate, or control another person. Abuse of power often arises where power imbalances exist and is a root cause of sexual exploitation, abuse, and harassment. Legitimate management, supervision, performance management, and organisational decision-making conducted fairly and proportionately do not in themselves constitute abuse of power.
Adult	Any person aged 18 years or over.
Adult at risk	An individual aged 18 years or over who may be more vulnerable to harm, exploitation, or abuse due to physical, social, economic, environmental, or contextual factors.
Child	Any person under the age of 18, regardless of local legal definitions of the age of majority, in line with the United Nations Convention on the Rights of the Child (UNCRC).
Child safeguarding	Actions taken to promote the welfare of children and protect them from harm, abuse, neglect, and exploitation, ensuring that children's rights, dignity, and best interests are respected.
Complainant	A person who makes a complaint relating to a safeguarding concern. The complainant may be the survivor or another individual reporting on their behalf.
Complaint	A report or allegation that an individual or organisation has caused harm, failed to meet safeguarding standards, or breached obligations intended to protect individuals from harm.
Concern	Information, suspicion, or allegation indicating a potential safeguarding risk or harm that requires attention, even where information is incomplete or not yet verified.
Duty of care	The obligation of organisations to take reasonable measures to ensure the safety, dignity, and wellbeing of individuals with whom they work or come into contact through their activities.
Gender-based violence (GBV)	Any harmful act perpetrated against a person's will that is based on socially ascribed gender differences. GBV includes sexual violence, exploitation, and abuse, and is often rooted in unequal power relations.
Partner	An organisation or entity collaborating with ActionAid to deliver programmes, projects, research, advocacy, or services in pursuit of shared objectives.
Rights holder	Individuals, groups, or communities participating in or affected by ActionAid's work, whose rights are recognised and promoted through a human rights-based approach.
Safeguarding	The responsibility of organisations to ensure that their staff, operations, programmes, and partnerships do not cause harm, and that they prevent and respond appropriately to abuse, exploitation, harassment, and other safeguarding risks.
Sexual abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual activity with a child (any person under 18 years) is considered sexual abuse regardless of the age of consent locally. Mistaken belief regarding age is not a defence.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another person.
Sexual harassment	Any unwanted conduct of a sexual nature that violates dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Sexual harassment may be physical, verbal, or non-verbal and may occur as a single incident or pattern of behaviour.
SEAH (Sexual Exploitation, Abuse and Harassment)	Collective term referring to sexual exploitation, sexual abuse, and sexual harassment.
PSEAH (Protection from Sexual Exploitation, Abuse and Harassment)	Policies, protocols, procedures, and measures designed to prevent and respond to sexual exploitation, abuse, and harassment.
PSEAH and Safeguarding Focal Point	A designated individual responsible for supporting implementation of safeguarding measures, providing guidance on reporting mechanisms, promoting awareness, and liaising with the Global SEAH and Safeguarding Team.

TERM	DEFINITION
Survivor	A person who has experienced sexual exploitation, abuse, or harassment. The term survivor reflects respect for the dignity, agency, and resilience of the individual. Individuals may choose the terminology they prefer.
Survivor-centred approach	An approach that prioritises the rights, needs, safety, dignity, confidentiality, and informed choices of the survivor in all safeguarding responses, ensuring that no further harm results from reporting or engagement with support processes.
Team Members	All individuals engaged with or representing AAUK in any capacity, whether paid or unpaid, regardless of location, type, or duration of engagement. This includes employees, volunteers, interns, consultants, contractors, secondees, trustees, board and assembly members, and any other individuals acting on behalf of AAUK or under its authority.

AAUK Policy Governance Record

AAUK Policy Name:	AAUK PSEAH and Safeguarding Policy
Version:	1.0
Policy Owner:	Senior Safeguarding Specialist

Ratified on		**Update Frequency**	3 yrs
Ratified by	GRC & Board	**Next Update Due**	2029

Key Changes Since the Previous Version	○ This single policy replaces ActionAid UK's previous safeguarding polices: • AAUK Child Safeguarding Policy • AAUK Protection from Sexual Exploitation and Abuse (PSEA) Policy • Sexual Harassment Exploitation & Abuse (SHEA) at Work Policy • Sexual Harassment, Exploitation and Abuse (SHEA) & Other Safeguarding Concerns | Overarching Policy (Localised Global Policy)

Policy Sharing	Open Information Policy / AAUK Website
Training & Monitoring	○ TRAINING ○ MONITORING ○ N/A
Applicable Legislation	○ LEGISLATION ○ N/A
Related AAUK Policies	○ AAUK Code of Conduct ○ AAUK Whistleblowing Policy ○ N/A
Related AAI Policies	○ Global PSEAH and Safeguarding Policy ○ AAI Code of Conduct ○ AAI Whistleblowing Policies ○ AAI Donor Reporting Standard Operating Procedure ○ SEAH Incident Reporting and Case Management Protocol ○ Child Safeguarding Protocol ○ Partner, Movement and Community Engagement Protocol ○ Digital and online Safeguarding Protocol ○ N/A

Author:

The Strategy, Performance and Risk Unit, in collaboration with external consultants and the Core Working Group

ActionAid International – Global Secretariat

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