ACT Alliance
SAFEGUARDING POLICY FRAMEWORK

Approved by the ACT Governing Board, May 2024

1. INTRODUCTION

ACT Alliance is a faith-based organization with members[1] operating in more than 120 countries. Members work together for positive and sustainable change in the lives of people affected by poverty and injustice through coordinated and effective humanitarian, development, and advocacy work. Within the alliance, ACT members work individually and as part of national, sub-regional and regional ACT forums; some work together through the participation in formal ACT reference groups or communities of practice.

All ACT members are accountable to their own governance structures and are responsible to the ACT Alliance for meeting the obligations of their ACT membership which includes the commitments in this policy framework. ACT members who fund or access funds through the ACT humanitarian appeal mechanism may have additional accountability responsibilities[2].

Safeguarding is an essential element of the work undertaken by ACT Alliance to support this agenda.

2. ACT ALLIANCE COMMITMENT TO SAFEGUARDING

Safeguarding is an ethical approach and set of practical measures adopted by organizations to promote the safety and wellbeing of everyone involved in the delivery and receipt of humanitarian action and development assistance, whether that is aid delivered as a response to conflict or emergencies, or programmes and activities that are focused on building the capacity of communities e.g. for health or education, etc. Safeguarding is about protecting people, as far as possible from all forms of harm, including sexual exploitation and abuse and sexual harassment, that might result from their involvement in or contact with the organization.[3] The likelihood of exploitation and/or abuse increases when individuals are in a vulnerable situation and where unequal power dynamics exist.

ACT Alliance's commitment to safeguarding, and expectation of members, includes protecting staff and others[4] from harm and inappropriate behaviour, including discrimination, bullying, and/or harassment in any form, and preventing and responding to harm caused by the organization to the people being served, including sexual exploitation and abuse and sexual harassment. This means ACT Alliance is committed to:

Safeguarding communities and individuals: by ensuring ACT Alliance Members 'Do No Harm' to communities and individuals with whom they are in contact or have impact upon.

Safeguarding staff and others, and partners: by being clear on expected behaviour and ensuring safe working environments.

Safeguarding the ACT Alliance Membership/Federation: by showing genuine commitment to safeguarding and preventing cases of abuse from happening which may tarnish the reputation of ACT Alliance and its partner organizations and affect ability to continue important work and receive funding.

Safeguarding ACT Alliance programmes: by showing genuine commitment to safeguarding and preventing cases of abuse from happening.

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[1] 150 members in April 2024.

[2] ACT Alliance Quality and Accountability Framework 2021.

[3] https://safeguardingsupporthub.org/sites/default/files/2020-11/RSH%20Safeguarding%20Framework_for%20Online%20Hub.pdf

[4] Others refers to individuals who are carrying out work on behalf of the organization and are bound by organizational code of conduct requirements, e.g. consultants, interns, suppliers, contractors, volunteers.

3. PURPOSE AND SCOPE

The Purpose of this Policy Framework is to provide ACT Alliance members with a set of clear safeguarding commitments to adhere to. These commitments set out comprehensive safeguarding requirements that underpin and address the key areas of prevention, reporting and response. They are compliant with international safeguarding standards, reflecting also CHS Alliance PSEAH safeguarding commitments.

A safeguarding policy (covering all forms of abuse and exploitation that might arise for staff and others and communities with whom the organization works) or a combination of policies that address particular forms of harm for particular groups, e.g. safeguarding children, or preventing Sexual Exploitation, Abuse and Harassment (SEAH) of staff and others and communities, is critical for all organizations, including faith-based organizations and churches.

The commitments described in this policy framework provide ACT Alliance members with **key safeguarding** content and points of reference from which they can develop their own safeguarding policies and procedures as determined by the work they are undertaking and the affected/impacted communities with whom they work. Application of these commitments is intended to protect everyone who is associated with ACT Alliance through upholding safeguarding principles and protecting people from sexual exploitation, abuse and harassment. Additional safeguarding requirements that account for the specific vulnerability of children is included and highlighted in the policy framework. Commitments to safeguard children must be compliant with the United Nations Convention on the Rights of the Child (1989).

When applying this policy framework to developing or strengthening policies and procedures, Members will also need to ensure that national law provisions (including employment law considerations) are taken into account. Where international standards are more robust than national law provisions, international standards still need to be applied. However, members will need to ascertain what national law means for addressing policy breaches, reporting to formal authorities, and providing support to survivors[5]. The ACT secretariat or structures which support safeguarding can provide support to do this, where necessary.

Policies developed by members must clearly apply to all individuals working for or representing the ACT member including permanent and temporary staff and others, during and outside of normal working hours.

A Guidance document that provides more detailed information on how members can develop or strengthen their safeguarding procedures is available to accompany this framework. The Guidance will also set out where appropriate the range of safeguarding provisions available that members can draw on depending on where they are at in their safeguarding journey or what they require for their particular work focus and community group/population.

4. VALUES

The faith-based values and ethos that underpin the work of ACT Alliance have clear synergy with the culture and principles that underpin safeguarding. ACT Alliance believes in rights and dignity for all including the right to be protected from abuse and exploitation. Therefore, the commitments set out in this policy draw on and acknowledge as supportive and reinforcing, the alignment of both these perspectives.

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[5] Protection from Sexual exploitation and Abuse Statement by the Inter-Agency Standing Committee (IASC) Principals 2015. Note that some people who have experienced harm prefer not to refer to themselves as survivors. The term used should be the choice of the affected individual.

*'We believe in inclusion, diversity and a locally led approach. We strongly
support approaches, standards and projects that make communities worldwide
more resilient and able to take the lead in their own development and rights'.*

ACT Alliance is also committed to gender justice (see gender justice policy, to be revised in 2024), takes a gender mainstreaming approach and believes in advancing gender equality throughout the organization. It has a stated commitment to overcoming abuse of power particularly in a context of gender and race. This approach has well established intersections with safeguarding where the abuse of power is widely understood as a root cause of safeguarding related abuses.

Definitions of harm and abuse covered under this, as well as definitions for other terms, can be found in the Glossary at Annex A.

5. SAFEGUARDING STANDARDS

The policy commitments set out here are underpinned by and compliant with international safeguarding standards. The DAC pillars have been included as an important point of reference as they have the approval and sign-off from most of the large international donors.

The CHS requirements are relevant for ACT members due to ACT Alliance being a member of CHS Alliance and therefore subscribing to its PSEAH requirements.

Keeping Children Safe standards identify 4 broad areas of international safeguarding compliance for organizations working with children.

The IASC Six Core Principles for PSEA inform all our work on preventing and responding to Sexual Exploitation and Abuse.

6. CODE OF CONDUCT

This policy framework is supported by **ACT Alliance's Code of Good Practice and accompanying Code of Conduct** which promote greater accountability and outline the key responsibilities of staff and others. The behaviour requirements in the Code of Conduct aim to protect all staff and others as well as every community member whom the ACT Alliance seeks to assist. Specifically, it identifies behaviours to ensure that staff and others shall at all times treat all communities the ACT Alliance seeks to assist (including crisis-affected populations, internally displaced persons and refugees), fairly and with respect, courtesy, dignity and according to international laws and standards. It also states that all staff and others must be mindful that each action in their respective context can have repercussions for the fate of many[6].

Within its Code of Conduct ACT Alliance identifies its requirement for **safeguarding children,** ensuring that:

- All staff and others behave appropriately towards children and never abuse the position of trust that comes with their position.
- All staff and others are aware of and respond appropriately to issues of child abuse and the sexual exploitation of children.

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[6] file:///C:/Users/Samsung/Dropbox/ACT%20Alliance/ACT%20Policies/ACT-Code-of-Conduct-Policy-2016-EN.pdf

- The ACT Alliance creates a child-safe environment in all activities by always assessing and reducing potential risks to children.
- All staff and others are driven by the duty of care to children.
- ACT Alliance members agree to abide by this Code of Conduct and accompanying Code of Good Practice when joining the Alliance. Similar codes of conduct will need to be developed and applied in each ACT Alliance member organization.

7. SAFEGUARDING RELATED POLICIES

To ensure consistent messaging and appropriate policy alignment on safeguarding, it is important to provide links and references where there is an interconnection with safeguarding. Additional ACT Alliance policies that support important elements of safeguarding can be found at Annex B.

8. ACT SAFEGUARDING PRINCIPLES

There are a number of safeguarding principles that are essential to apply in order to prevent and respond to harm and abuse:

Zero tolerance. ACT Alliance upholds the zero-tolerance principle towards inaction on reports and concerns regarding abuse or harm of those working in the organization and those whom it serves. ACT will respond to all reports, concerns, or allegations in a fair, reasonable and timely way in accordance with ACT Investigations Policy, while ensuring survivors' rights and needs remain central.

Do No Harm. If we do not understand how our presence interacts with the wider environment in which we are working in such circumstances, and seek to avoid or mitigate negative impacts, our efforts can end up harming more than benefiting those we are trying to help. The basis of DNH is to ensure careful consideration is given so no harm is done intentionally or unintentionally.[7] The application of this principle is critical to safeguarding practice particularly as it applies to risk assessment and incident management.

Confidentiality is critically important to safeguarding. ACT is committed to working with survivors/complainants and all others involved in an incident management process in a confidential and respectful manner. Breaches of confidentiality undermine confidence and trust in ACTs safeguarding and complaints management processes and can negatively impact the organizations itself. Maintaining confidentiality around people's personal data and information is particularly important when managing issues relating to sexual exploitation abuse and harassment and is fundamental to ensuring a survivor-centred approach**.**

Accountability. As an alliance, ACT seeks to ensure that the processes for accountability and varying roles and responsibility coexist seamlessly, and all accountability systems work as a coherent whole. ACT works to ensure that an effective system for accountability instils a culture of accountability at all levels[8]. Managers have particular responsibilities to create environments which keep people safe and promote the implementation of the Global Code of Conduct.

Intersectionality, gender and power. ACT takes an intersectional approach to safeguarding, recognising the importance of gender and power. We take full account of gender in considering the specific safeguarding needs of all gender and other intersecting identities (e.g. disability, race, ethnicity etc.). We address safeguarding risks for all children and adults, which includes increased risks relating to gender bias and

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[7]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573785/GEC-Do-No-Harm-Policy.pdf

[8] https://actalliance.org/quality-and-accountability/

discrimination. We also work to foster the inclusion of, children and adults in the safeguarding process, in a manner that is person centred and promotes equality, equity and ultimately their increased safety and protection.

Cultural Sensitivity Cultural sensitivity is a fundamental principle of safeguarding. It should inform practice at all levels including behaviour, direct contact with community members, and consent. However, it is important to remember it must never be used as a reason or justification for not reporting a safeguarding concern or investigating and taking action on a safeguarding report or concern.

Survivor/community-centred approach. ACT puts the rights, dignity, needs and wants of survivors and victims of harm and abuse at the centre so they get the assistance and support they need. Confidentiality is always prioritized and procedures are designed in ways that avoid potential re-victimization of the survivor.

Mandatory reporting. Where an ACT employee/member identifies/raises concerns or suspicions regarding harm or abuse by a colleague or partner staff and others they must report such concerns. The exception to this is survivors or victims of harm and abuse. While it is appropriate to encourage them to report, they can decide if, when and how to do so. Members should set timeframes for reporting internally and to donors, where this applies. Reporting internally should be within 24 hours of receiving a disclosure.

Organizational learning. Use organizational knowledge and intelligence that already exists to proactively address sexual harassment, abuse and exploitation, rather than waiting for individual reports of abuses, and take responsibility for developing interventions which recognise and act on informal knowledge and experience, in the context of gendered power inequalities.

9. ROLES AND RESPONSIBILITIES

All employees within ACT Alliance member organizations have a role to play in safeguarding. Certain employees also have responsibility for monitoring the implementation of a Safeguarding Policy or designing and adapting organizational systems and processes to integrate safeguarding requirements. Those with designated safeguarding responsibilities are responsible for helping others understand their obligations under a Safeguarding Policy and respond, as necessary, to safeguarding reports and concerns. Below is an overview of the roles and responsibilities for employees, management and safeguarding focal points. These should be clear and explicit in all safeguarding policies. It is an expectation that all ACT members appoint a Safeguarding Focal Point or a position with designated safeguarding responsibilities within their organizations to ensure essential safeguarding elements are in place and critical requirements are carried out.

All Employees and Others

● Employees and others, regardless of the type of contractual relationship, must be aware of and strictly follow the safeguarding policy, its procedures, and guidelines. Every employee must be clear on their duty and responsibility to safeguard, report and promote appropriate behaviour.

● Employees and others must complete mandatory induction and training opportunities related to safeguarding as requested by the organization. The e-learning module and facilitated online training on Fabo ACT Learn Platform can be used for this.

● Employees and others are obliged to report suspicions, to respect the confidentiality of the persons involved, not to act in bad faith and not to retaliate under any pretext whatsoever.

● Employees and others are expected to conduct themselves with the highest standards of behaviour, as outlined in the Code of Conduct and detailed in associated policies.

Management

- Management is responsible for creating and promoting a safeguarding culture where employees feel able to raise concerns without fear of retribution. They are responsible for setting positive examples on and off duty to promote the Safeguarding Policy. Management will ensure they build their knowledge and skills for creating a safeguarding culture.

- Promote language and discussions on safeguarding that frame abuse in relation to power imbalances and gender and racial inequalities, seeking to address the underlying causes of the problem by tackling power imbalances that create the conducive context for abuse, including a culture of impunity.

- Those holding management roles will integrate safeguarding requirements into the systems and processes, programmes, and projects they are responsible for.

- Management will monitor that their teams, as well as those with whom the organization has relationships, are aware of the organization's policies on the prevention, reporting of, and response to, harm and abuse. This includes the communities served.

- Management will ensure that staff and others have designated safeguarding responsibilities and that resources are made available to implement safeguarding in their area of responsibility, including training, monitoring, and follow-up of the implementation of the Safeguarding Policy.

- Management will include discussions on safeguarding and monitoring the implementation of the Safeguarding Policy in their team meetings and internal and external management reports.

- Management has overall accountability for the Safeguarding Policy and its implementation, including ensuring that organizational systems and processes include the necessary safeguards e.g. recruitment.

- Management is responsible for ensuring the policy is reviewed and updated every three years.

Safeguarding Focal Points/staff and others with designated safeguarding responsibilities

- Safeguarding Focal Points support management to design, implement and monitor progress on safeguarding policies and procedures.

- Safeguarding Focal Points take a lead role in raising awareness about the organization's safeguarding measures and culture.

- Safeguarding Focal Points work with managers / employees to ensure that programmes and operations identify safeguarding risks and develop appropriate mitigation measures.

- Safeguarding Focal Points act as a point of contact for employees (and others) to report any queries or raise any safeguarding concerns.

- Safeguarding Focal Points conduct service mappings and identify referral pathways that the organization can use to support survivors to access available services.

10. PREVENTION

Prevention is a critical component of safeguarding, rooted in the underlying principle that it is **better to take action before harm occurs**. It comprises a number of elements that must be understood and applied for their specific safeguarding requirement. However, it is important for the purpose of embedding and integrating safeguarding prevention to understand how these elements combine and work together to provide a holistic approach to safeguarding. Specific consideration should be given to preventative measures and how these might differ between children, adults and staff and others. Comprehensive dos and don'ts should be included in the Code of Conduct to clarify behaviour requirements; when trips and events are being arranged procedures should be developed with clear roles and responsibilities identified, and appropriate consents obtained. Children and adults, as well as staff and others, should always be briefed on their right to be safeguarded; what it means and how to make a report safely.

i. Leadership and Culture

Establishing a culture for safeguarding is critical in order for organizations to meaningfully apply safeguarding policies and procedures. A safeguarding culture is most effective in safeguarding people and organization's reputations when its leadership and senior management become its strongest exponents and supporters. Establishing a culture for safeguarding cannot be done in isolation of wider organizational culture initiatives and it is here, for example, that safeguarding needs to align and work with an organization's initiative on Gender Justice, Equity, Diversity, and Inclusion.

ACT Alliance is committed to effective safeguarding leadership where the actions and behaviours of leaders within ACT Alliance member organizations bring the alliance values to life, drive accountability, encourage reporting, and champion ethical and inclusive behaviours and practice.

ACT Alliance is also committed to creating and promoting an organizational culture that celebrates diversity, tackles inequality, and dismantles negative uses of power and privilege. ACT Alliance recognizes that advancing gender justice, including supporting gender equity and equality, is of paramount importance to ensuring a workplace that is free from harm and abuse. Leadership and management in ACT Alliance member organizations should role model behaviours and work with safeguarding 'champions' (selected Employees) who actively promote a safeguarding culture.

ACT Alliance member organizations should commit to analysing their existing organizational culture and to strengthening this for safeguarding where necessary. ACT members are also expected to articulate leadership behaviours which contribute to a safeguarding culture and ensure these are included in recruitment and performance management processes. It is important that all staff and others understand the root causes of safeguarding issues as an abuse of power and work to addressing negative use of power.

ii. Governance and Accountability

Good safeguarding governance supports an organization's compliance with the law and relevant regulations. In the context of safeguarding, it is about how well senior executives, board members and senior accountable managers understand what is going on in order to make informed decisions and demonstrate sufficient oversight in relation to prevention and response measures. Furthermore, a strong leadership culture and effective governance plays a critical role in addressing, reforming, and reinforcing norms, values, attitudes, and behaviours within an organization to support abuse prevention strategies.

Safeguarding means ensuring that the organization you govern does not cause SEAH or other harms and abuses to anyone in the process of delivering the work. This includes staff and others and anyone who interacts with the organization.

Recognising the ways in which safeguarding related abuses intersect with the abuse of power, ACT members are expected to demonstrate governance commitment to the responsible and transparent use of power. This should be reflected in all relevant policies and training schedules to inform behaviours and attitudes with and between board, staff and others, partners and stakeholders and communities across all tiers of the organization.

iii.   Recruitment and Induction

In line with best practice, safe recruitment processes must be in place in order to ensure that staff and others are compliant with safeguarding values and principles and to reduce the likelihood of engaging someone who may pose a Safeguarding risk to the communities they work with, and to staff and others within the organization.

Safer practice in recruitment means that every stage of the process (from advertisement to induction) must integrate safeguards, in order to deter unsuitable candidates from applying or being appointed into the organization. Safeguarding in recruitment requires a consistent and thorough process of obtaining, collating, analysing, and evaluating information from and about applicants. This should include a core recruitment question for applicants to share experience with and actions on reports of sexual abuse and exploitation in programmes and in the organization, and in compliance with the Misconduct Disclosure Scheme. Thorough and robust recruitment processes will be put in place throughout ACT Alliance and aligned with relevant employment law.

Where organizations engage in work with children specific recruitment measures required for their protection should be in place.

Recruitment practices should also adopt measures to counter discrimination and inequality, including sexism and racism, to ensure compliance with ACT Alliance values.
ACT Alliance is committed to training staff and others to contribute to safeguarding cultures and be able to proactively identify abuse and exploitation in their organizations, and to recognise and respond to abuse when it does occur. This must be a minimum safeguarding requirement. The training should include safeguarding induction, basic mandatory training including the code of conduct, and protection of sexual exploitation and abuse, and refresher programmes as required.

iv.   Performance Management

Safeguarding should be included in performance management processes which assess performance and identify training needs and opportunities.

Performance management discussions can be used, at the least, as a reflection for staff and others to discuss their understanding of safeguarding and raise any concerns they might have. More structured discussions and assessment against performance indicators for safeguarding will promote accountability for staff and others, and managers.

Specific training for leadership and management should be provided to support them to create and promote a culture of safeguarding. This will include understanding the role of power and privilege in safeguarding, including gendered and racial inequalities, and how conscious and unconscious biases impact on creating a safeguarding culture and how to role model behaviours which contribute to being a safer organization. Safeguarding concerns everyone, and is the responsibility of all, it is particularly relevant to vulnerable/marginalised groups and children. It is important therefore that safeguarding training in these contexts addresses how abuse of power operates to enhance vulnerability and risk. It is important to use a performance management approach, which ensures systems and processes are built on an analysis of gender and recognise explicitly the specific vulnerabilities of adolescent girls, and that management work closely with gender specialists and access related gender training.

Where focal points are appointed to lead safeguarding, enhanced safeguarding training, commensurate with the advisory and support elements of the role should be provided to ensure confidence and trust in the resource.

v.   Risk Management

ACT Alliance is committed to a risk management approach to safeguarding. An organizational risk management process should therefore include the identification of safeguarding risks that are monitored, reviewed, and reported on. These risks should be based on safeguarding risk assessments carried out at the organizational and project/programme level.

Those with responsibility for designing, delivering, and managing the work are responsible for identifying potential safeguarding risks and mitigation measures across all programmes and operations.

A number of factors combine to define an organization's operating context as it applies to safeguarding children. These include but are not limited to geographical location, socio economic conditions, cultural norms and practices, conflict, humanitarian conditions, and development. Risk assessments must consider these external factors at all stages of a programme cycle, from design through to implementation and review. This allows for risk mitigation and action planning to take place and helps to highlight particular vulnerabilities that may need specific address.

Members must work with partners to carry out safeguarding risk assessments and/or ensure that partners carry out their own safeguarding risk assessments.

vi.   Safe Programming

ACT Alliance members are responsible for making sure programmes do no harm to children or adults. Those with responsibility for managing, designing and delivering programmes will ensure safeguards are integrated at all stages from assessment through to close out. These safeguards will ensure that the risks presented by the programme are well understood, actions to mitigate the risks are identified, included in programme and funded appropriately. Programmes will be monitored and evaluated to ensure they are being delivered safely.

Programme teams will ensure that those with whom ACT Alliance members work, and those involved in our work, understand our commitments on safeguarding and what systems exist for them to make reports or raise concerns.

It is important to ensure that programmes are designed with a child's rights lens and safe spaces are created for children and young people to share their ideas and give feedback including objections, Monitoring and evaluation mechanisms should include these areas for review.

Children and communities participating in programmes are provided with information and the organization's commitment to safeguarding and how to make a report. Programmes that are particularly risky should include activities to consult children and communities on how they would like to report harm or abuse.

vii.   Partners

When ACT Alliance works with partners, all entities/partners have a responsibility to meet minimum standards of safeguarding. All partners, suppliers and contractors that work together on a programme or service must be assessed on their capacity to implement safeguarding measures. ACT Alliance will work collaboratively with partners to create safe working approaches that uphold the rights of all. Engagement with partners on safeguarding will be based on mutual respect and learning. ACT Alliance members will ensure agreements with partners etc. include agreed safeguarding standards which reflect sector principles and commitments e.g. the Inter-Agency Standing Committee (IASC) Task Force's six core principles and are relevant and proportional for the work being delivered and the capacity of each partner.

All partners will be encouraged to work to their own safeguarding policies and codes of conduct, ensuring at least equivalence with the contracting Alliance member. In the absence of these, partners agree to adopt the commitments and obligations described in ACT Alliance Safeguarding Policy commitments and Code of Conduct. Memorandum of Understandings (MoU) with partner organizations and agreements with suppliers and service providers should include this policy as an appendix, where relevant. ACT Alliance supports partners to meet commitments and obligations.

Safeguarding concerns arising from the partnership, programme or service delivery, or involving senior or key employees in partner, service provider organizations will be reported as per the partnership/service delivery agreement. ACT Alliance will work with the partner or service provider on the response, providing support where necessary to ensure the response is managed effectively.

Breaches of partnership agreements or service provider contracts can lead to termination of those agreements or contracts.

viii.   Communication & Social Media

ACT Alliance is committed to ensuring its communication systems and processes do not present safeguarding risks to anyone, including staff and others, member organizations, community members and children. This policy reaffirms the commitments made in the ACT Communications Policy and ACT Social Media Policy, which provides ethics and standards that ACT Alliance adheres to.

All communications featuring children or adults in the community are subject to appropriate safeguards and conform to relevant data protection standards. This includes ensuring images and information are obtained and published with informed consent, that they do not put those featured at risk of being identified, and that they portray those featured in a manner which does not reinforce negative stereotypes.

Where programme provide children and young people with access to social media, often via organization-hosted sites, online environments will be assessed as safe and moderated to ensure that children and young people continue to be protected and encouraged to behave as responsible online users.

11. REPORTING

An effective safeguarding reporting system is essential to ensure accountability to victims and survivors of abuse, and to provide a coherent case management process for the organization. Such a process should include organizational accountability, safe and reliable reporting pathways for staff and others and community members as well as confidentiality, support, and protection for those reporting.

A system of reporting is an essential international safeguarding standard. Compliance with this standard is a requirement of all major associations, donors and regulators including DAC; ISAC; CHS Alliance and UNICEF. This established consensus requires a robust reporting process to engender the necessary trust in the organization's overall safeguarding process and as such, should include accessible reporting pathways, formal and transparent decision-making processes, and a victim/survivor centred approach to managing reports and complaints. The application of these reporting mechanisms is critical to both interrupting and preventing abuse, and must be accountable to the legal requirements of the organization's jurisdictions. Working collaboratively with communities, local agencies, and where necessary national systems to introduce reporting mechanisms provides the basis for greater efficacy and cooperation.

All ACT Alliance member staff and others are obligated to report allegations, concerns or suspicions of breaches related to the ACT Alliance Code of Conduct and the ACT Code of Good Practice. Proven deliberate nonreporting should lead to disciplinary action. This safeguarding framework requires ACT Alliance members to implement a reporting process that sets out roles, responsibilities, and timeframes on handling of complaints and provide clear and simple procedural guidance for responding to and resolving complaints against ACT member staff and others.

All ACT members and the ACT secretariat have a responsibility to ensure that all their staff and others are aware of and comply with whistleblowing procedures and understand reporting pathways for staff and others related to safeguarding complaints including sexual exploitation and harassment.

> **Reports of abuse from children and young people**
> If abuse is disclosed by a child or young person, whether or not complaint is made by the child abuse survivor themselves, the process of reporting and managing the incident will require additional age-appropriate steps and considerations, and should only be in consultation in consultant with a child safeguarding specialist.

To ensure access for children to report concerns and make disclosures, a child friendly reporting mechanism, community based, if necessary, should be made accessible to children. These are most effective when created in consultation with children and informed by their ideas about their needs. Child friendly complaints mechanisms uphold the rights and voice of children by providing opportunities and platforms for children to be heard.

Reports of a criminal nature will be reported to the local authorities, ensuring that it is safe to do so. 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 ACT Alliance will take every reasonable measure to address the concern.

12. RESPONSE

ACT Alliance is committed to effective safeguarding response. ACT Alliance members must implement response systems that ensure accountability to victims and survivors of abuse and provide a coherent case

management process for the organization. Such a process will set out the organization's accountability, a clear response plan, as well as confidentiality, support, and protection for those reporting.

All allegations and concerns will be taken seriously, irrespective of the identity of the alleged perpetrator and survivor, and regardless of how 'unbelievable' the situation may seem. ACT Alliance is committed to carrying out robust, transparent, 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 a prompt response and that confidentiality is maintained and that the wellbeing of all is protected. To avoid re-victimization, we commit to preventing survivors having to report on their experiences repeatedly.

As part of our survivor-centered approach, survivors can choose whether they want the ACT Alliance member to investigate formally. However, there may be occasions where the ACT Alliance member has a duty of care to others to carry out a formal investigation. This will be discussed with the survivor to ensure they are safe throughout.

All ACT members must have a response process in place as an essential component of their safeguarding procedures and the following steps should be followed:

- A safeguarding report or complaint should be responded to through an initial enquiry where information is shared on a need-to-know basis having regard to confidentiality.
- In order to support an investigation, where it is necessary, members should have a clear investigation procedure available to guide planning and decision making, and to ensure a victim/survivor approach is applied.
- Clear records should be kept to validate and confirm the response process, and to provide to local law enforcement if required as evidence, or external agencies as required. Substantiated reports, harm or abuse concerning employees will result in disciplinary action.
- Investigations are guided by international best practices and human rights standards and managed and conducted by trained investigators, who understand the impact of trauma and how it affects the survivor and those who have witnessed sexual misconduct. The Investigations Guidance describes this further. Where possible and appropriate investigations will be carried out by third party investigators.

If concerns are raised in relation to a child/children, or by a child, there is an immediate responsibility to ensure the child, and if necessary the family are safe. Care should be taken not to question the child without a planned and agreed approach led by a trained investigator. All response measures should be guided by a response procedure that has the best interest of the child at its centre.

ANNEX 1 - GLOSSARY

Abuse	When someone misuses their power or control over another person, causing harm or distress. This could happen because of gross negligence or sexual, physical or emotional abuse.
Alleged Perpetrators/Subject of Complaint	Alleged perpetrators or subjects of complaint are individuals who have allegedly behaved inappropriately or abused or exploited people (termed as survivors)
Bullying	Repeated behaviour which is intended to hurt someone either emotionally or physically, and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability
Child Safeguarding	Child safeguarding is the set of internal facing, policies, procedures and practice employed to ensure a child safe organization, i.e., 1. Anyone who represents the organization behaves appropriately towards children and never abuses the position of trust that comes with being a member of the organization. 2. Everyone associated with the organization is aware of and responds appropriately to issues of child abuse and the sexual exploitation of children. 3. Creating a child-safe environment in all activities by always assessing and reducing potential risks to children. 4. A duty of care to children is considered a top priority.
Child	A person below the age of 18
Child-Safe Environment	A child-safe environment is one where active steps are taken to reduce risks of harm against children, and there are clear, established guidelines and procedures for conduct, reporting abuse and response.
Compliant	Information provided, whether by a complainant or any other person (source), indicating conduct that may be in breach of the organization's code of conduct but that has yet to be assessed.
Community Based Reporting Mechanism (CBRM)	1) a way for communities to raise concerns or provide feedback to a CSO. 2) a way for [organizations] to listen to feedback and complaints from community members and respond in a timely, confidential and impartial manner. 3) feedback or complaints on various topics can come through a CBCM, including programme services or procedures, fraud or corruption, or on sexual exploitation and abuse (SEA).

	4) a CBCM includes a range of safe, accessible, appropriate channels for all community members.[9]
Do No Harm	The guiding humanitarian principle that requires actions and decisions to be taken to avoid causing further damage and harm
Duty of Care:	A common law concept that refers to the responsibility of the organization and individual to provide staff and others, community members and children with an adequate level of protection against harm. It is the duty of the organization and its individuals to protect children from all reasonably foreseeable risk of or real injury.
Exploitation	The deliberate maltreatment, manipulation or abuse of power and control over another person. Exploitation includes, but is not limited to, slavery, forced labour, trafficking and prostitution.
Gender Based Violence	Any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life. This is usually used to refer to harm that is not caused by the organization.
Harassment	When someone behaves in a way that causes offence, distress or intimidation. This could be abusive comments or jokes or insulting gestures. This includes sexual harassment as well as other forms of harassment.
Harm	Any detrimental effect of a significant nature on a person's physical, psychological, or emotional well-being. For harm to be significant, the detrimental effect of a person's wellbeing must be substantial and serious.
Physical abuse	Physical force or mistreatment of one person by another which might or might not cause physical injury. It includes, but is not limited to, hitting, pushing, pinching, punching and misuse of restraint.
Protection from Sexual Exploitation and Abuse (PSEA)	The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff and others or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)
Safeguarding	The responsibility of organizations to make sure their staff and others, operations, and programmes do no harm to children and adults at risk nor expose them to abuse, exploitation, bullying and harassment.

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[9] Resource and Support Hub.

Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual harassment	Sexual harassment is a type of harassment involving the use of explicit or implicit sexual overtones, including the unwelcome and inappropriate promises of rewards in exchange for sexual favours.
Safeguarding Against SEAH (Sexual Exploitation, Abuse and Harassment)	Narrows the focus to sexual harm. It also focuses on safeguarding of staff and others and adults at risk more explicitly and addresses bullying and harassment.
Survivor	The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.
Whistleblowing	Act of reporting a concern about a (safeguarding) risk, wrongdoing or illegality.

ANNEX 1 – ACT Policies which support Safeguarding

Additional ACT Alliance policies that support important elements of safeguarding include:
- Code of Conduct
- Code of Good Practice
- Communications Policy
- Communities Data Protection Policy
- Complaints Policy (including commitments to whistleblowing)
- Gender Policy
- Humanitarian Policy
- Social Media Policy
- Quality and Accountability Framework.