

NOTICE OF MOTION
SAFEGUARDING AND PREVENTION OF SEXUAL EXPLOITATION AND ABUSE (PSEA)
POLICY FOR HUMANITARIAN AND DEVELOPMENT CONTEXTS AND THE AAI CODE OF CONDUCT

Mover of Motion: ActionAid International Board

Motion Type: Ordinary

Date: 23 May 2018

To: AAI Assembly

The ActionAid International Board presents the following motion for decision by the ActionAid International Assembly in its upcoming Annual General Meeting on 21st and 22nd June 2018, in Athens, Greece.

I. Brief background of Ordinary Motion:

ActionAid works to end inequality of all kinds and, in particular seeks to end gender inequality and all forms of violence against women and girls. We are also aware that as a large international federation, those working with ActionAid have increased power and privilege. This policy aims to safeguard all people who come into contact with ActionAid through our work in humanitarian and development contexts from abuses of that power and privilege in the form of sexual exploitation and abuse (SEA). SEA is a form of Gender-Based Violence, which is more likely to be experienced by women and girls, however SEA is based inherently on unequal power dynamics and this can be experienced by men and boys and can be perpetrated by someone of the same sex as the survivor. There are no excuses for SEA to be perpetrated in any context against anyone and ActionAid is firmly committed to eliminating any form of SEA within its humanitarian and development work.

This policy should be read and enforced together with the Anti Sexual Harassment Policy (2005), Whistle Blowing Policy (2008), Child Protection Policy (2017), Complaints Policy and Staff Code of Conduct (2018). It specifically states the principles, policies and core procedures that uphold the prevention of any sexual exploitation and abuse by persons contracted to work in or with ActionAid (staff, board and assembly members, external visitors to programmes, volunteers, interns, contractors and partner organisations) in all contexts with specific attention to work in humanitarian settings, including conflicts and protracted crises. Together these policies enforce the safeguarding of all people ActionAid works with and for from any actions or behaviours of the people who work with us in any respect.

The International Board also recognises that a strong commitment from leadership at all levels (including governance and management) is needed to achieve the significant cultural shift required to fulfil our commitment to zero tolerance to sexual harassment, sexual exploitation and abuse. Such commitment should be backed by adequate policies, mechanisms and resourcing. Alongside the proposed policies, the International Board has created a Safeguarding Lead position (reporting to the Secretary General) with the responsibility of providing specialist leadership to the organization in the development and implementation of feminist strategies, policies and procedures to prevent and protect staff and programme partners and beneficiaries from sexual exploitation and abuse perpetrated by ActionAid International (AAI) employees and

representatives. A Safeguarding Reference Group¹ was also created to champion safeguarding across the Federation and consult and advise on safeguarding policies, tools, systems and their implementation and to promote a pro-active and positive safeguarding culture within the Federation. Safeguarding plans (including required financial and human resources) are being developed as well as tools and partnerships towards a collective effort to achieve such cultural shift. The policy will also be backed by building a Federation wide safeguarding community that includes a team resourced at GS level, the Safeguarding Reference Group and focal safeguarding staff in all country and hub offices who will collaborate to promote and implement plans.

II. Recommendation and expression supporting motion:

ActionAid has a **zero-tolerance** policy to any form of sexual exploitation and abuse. Any person found to have engaged in this abuse will be subject to gross misconduct which may result in immediate termination of employment. ActionAid will not accept resignations from individuals in such a case and details will be shared with potential employers. In addition, when SEA involves the perpetration of a crime/s, the police in the country where the crime was committed will be informed.

ActionAid recognises sexual exploitation and abuse as gross misconduct and perpetrators will face disciplinary action, including immediate termination of employment and referral for criminal prosecution, where appropriate.

The International Board recommends the approval of the PSEA and the AAI Code of Conduct as part of a larger Federation wide commitment to change culture and behaviours. Content and capacity gaps will be identified as these proposed policies are implemented and if amendments are required, they will be presented at the 2019 Assembly.

III. The requested motions are as follows:

The International Board moves that:

- **The Assembly approves the Safeguarding and Prevention of Sexual Exploitation and Abuse (PSEA) Policy for Humanitarian And Development Contexts as proposed in Annex 1 as per Article 13.2 (i) of the AAI Constitution.**
- **The Assembly approves the ActionAid International Code of Conduct as proposed in Annex 2 as per Article 13.2 (i) of the AAI Constitution.**



Nyaradzayi Gumbonzvanda
On behalf of AAI Board

¹ Initial composition of Safeguarding Reference Group: Lead – Global Safeguarding Lead (currently Sonya Ruparel, who will become part of the reference group once substantive position is appointed); Andrea Metcalf – AAUK Deputy Director for People and Culture; Farha Waheed – GS HR Business Partner; Ingela Holmertz – Executive Director, ActionAid Sweden; Lakshmi Subramani – Executive Director, ActionAid Liberia; Sonya Ruparel – Deputy Humanitarian Director, IHART; Sujeeta Matheema – Executive Director, ActionAid Nepal

Paper 8:

ANNEX 1 : SAFEGUARDING AND PREVENTION OF SEXUAL EXPLOITATION AND ABUSE (PSEA)

POLICY FOR HUMANITARIAN AND DEVELOPMENT CONTEXTS

1. Definitions

The 2016 InterAgency Standing Committee (IASC) definitions of sexual exploitation and abuse are:

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 abuse: 'The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions'

ActionAid's definition of sexual exploitation and abuse aligns to the IASC definition but also covers other areas of Gender Based Violence (GBV) and abuse (not just sexual) to ensure that our approach to safeguarding is comprehensive in terms of the behaviours and actions we expect of all people working for and with ActionAid. It incorporates the following further definitions that relate to SEA and GBV:

- **Rape** - non-consensual penetration (however slight) of the vagina, anus or mouth with a penis or other body part. Also includes penetration of the vagina or anus with an object.
- **Sexual assault** - any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.
- **Rape or sexual assault of a minor** - All sexual activity with a child under 18 years of age is prohibited regardless of the age of majority or consent locally and is considered as sexual abuse. Mistaken belief in the age of a child is not a defence.
- **Transactional sex** - The exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance and the use of sex workers.
- **Exploitative relationship** - A relationship that constitutes sexual exploitation, i.e. 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. ActionAid will see any sexual relations with a community member who is directly supported by ActionAid or a partner as exploitative.
- **Trafficking of persons for sexual exploitation** - The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of sexual exploitation. The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth above e.g. threat or the use of force or other forms of coercion etc.

- **Physical Assault:** an act of physical violence that is not sexual in nature but is considered to be gender based violence and therefore falls under this policy. Examples include: hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that results in pain, discomfort or injury.
- **Forced Marriage:** the marriage of an individual against her or his will which includes Early and Child Marriage, as a child is not able to provide informed consent.
- **Psychological / Emotional Abuse:** infliction of mental or emotional pain or injury. Examples include: threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, verbal harassment, unwanted attention, remarks, gestures or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Sexual Harassment versus SEA:

SEA can occur against any beneficiary who comes into contact with ActionAid through our work including the humanitarian and development contexts.

Sexual harassment occurs between staff and involves any form of: ‘unwanted conduct, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual’.

If your complaint concerns sexual harassment please refer to the Anti Sexual Harassment in the Workplace Policy (2018) for further information and guidance on reporting.

2. Key Principles

- 2.1 ActionAid commits to uphold the highest level of personal and professional conduct amongst its staff, contractors, volunteers, board members and partners working in or visiting all programming contexts, and particularly humanitarian settings, ensuring zero tolerance of all forms of sexual exploitation and abuse against affected populations, including women and children, and in times of conflict, disaster and occupation.
- 2.2 All ActionAid representatives are expected to read and sign their commitment to the ActionAid Code of Conduct, which outlines acceptable and unacceptable behaviour.
- 2.3 ActionAid views any form of sexual exploitation and abuse as a gross violation of human rights.
- 2.4 ActionAid recognises the *IASC Guidelines (2011)* and *Global Standard Operating Procedures (2016) on the Prevention of Sexual Exploitation and Abuse (PSEA)*.
- 2.5 ActionAid affirms the primacy of Accountability to Affected Populations as an integral part of its humanitarian signature and upholds the Core Humanitarian Standards (CHS) particularly **Key Action 3.6: Identify and act upon potential or actual unwanted negative effects in a timely and systematic manner, including areas of sexual exploitation and abuse by staff or Actionaid representative.**
- 2.6 ActionAid upholds the federation wide *Commitments to Women’s Leadership, Rights and Protection in Emergencies (2016)*;
- 2.7 ActionAid recognises that Sexual Exploitation and Abuse inflicts harm on those whom the humanitarian community are obliged to protect as well as jeopardises the credibility of all humanitarian assistance agencies;
- 2.8 ActionAid will promote cooperation and assistance between organisations in preventing and responding to SEA;

3. Programme Implementation to ensure the prevention of sexual exploitation and abuse

ActionAid recognises that PSEA must be integral to its humanitarian, resilience and wider development work. ActionAid emphasises that PSEA is a commitment for the whole organization and must go beyond Human Resources related actions. Therefore ActionAid will ensure the following programmatic interventions are implemented:

- 3.1 Ensure the active participation of rightsholders in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods;
- 3.2 Recognise that sexual exploitation and abuse is often grounded in gender and other inequalities, ActionAid will ensure that development and humanitarian activities are conducted in a gender-sensitive manner, drawing on intersectional feminist analysis. This will include:
 - 3.2.1 Creating separate spaces for women and men where necessary;
 - 3.2.2 Creating safe spaces for consultation and monitoring of programme activities based on strong contextual intersectional feminist and power analyses;
 - 3.2.3 Having a clear risk assessment in place for all programmes outlining sexual exploitation and abuse and safeguarding risks within the programme and putting in place measures to address these in programme plans (e.g. looking at where and when activities take place, assessing staff (including drivers, partners etc) awareness of risks, ensuring services are safe and accessible etc.).
- 3.3 Ensure that all responses are developed in a manner that balances respect for due process with prioritising the safety, dignity and rights of survivors;
- 3.4 Integrate and mainstream PSEA into all development and humanitarian work, as well as promote standalone protection programming in humanitarian settings with clear complaints mechanisms;
- 3.5 Ensure that assistance for those affected by violations is provided in a non-discriminating manner and in ways that prevent additional harm, including, when applicable, the involvement of a third party²;
- 3.6 Ensure that all staff, volunteers, contractors and partners share a responsibility to maintain an environment that is free of sexual exploitation and abuse and to report any abuse they suspect or witness, whether within ActionAid or outside in line with the reporting protocols outlined in this policy; and
- 3.7 Ensure that a copy of this policy will accompany all partner MOUs and discussions held with partners to further embed understanding and compliance.

4. Human Resources processes on prevention of sexual exploitation and abuse

ActionAid will implement HR measures at global and all national levels to ensure that all HR processes (recruitment, capacity development, performance reviews, etc) ensure the prevention of sexual exploitation and abuse in development and humanitarian settings with the following steps:

- 4.1 ActionAid will aim for meeting the target of recruiting 50% women in functions that relate to humanitarian and resilience work in recognition that SEA happens as a result of gender inequalities and in line with World Humanitarian Commitments made in 2016.
- 4.2 ActionAid will ensure that all staff recruitment, including volunteers, consultants and interns will include reference checks (written and verbal where necessary)
- 4.3 ActionAid will not knowingly appoint any person with a history of perpetrating any form of GBV or SEA and will carry out DBS/police checks in line with country requirements
- 4.4 All interviews of new staff will include questions that relate to their understanding of safeguarding and preventing sexual exploitation and abuse.
- 4.5 All new job descriptions will reflect organisational commitments to PSEA and safeguarding as standard and all new staff will sign all safeguarding policies.
- 4.6 All EFAST (Emergency Fast Action Support Team) members will be expected to undertake PSEA and safeguarding training in their country of residence.
- 4.7 All recruiting managers and HR involved in recruitment and hiring should be held accountable for their behaviour and practices, and staff will not abuse their position of power in the hiring process in accordance with the Code of Conduct.
- 4.8 All managers and HR professionals will be aware of the procedures outlined to deal with reported cases of SEA.
- 4.9 Inductions of all staff will include a specific session with line managers and an HR representative on their understanding and adherence to key ActionAid policies and procedures.
- 4.10 Each country office in ActionAid and AAI GS hub office will ensure that all staff (including any hosted GS staff in that country) understand the complaints mechanisms and of the Standard Operating Procedures for SEA.
- 4.11 Each country office and AAI GS hub office will create space among staff and partners to discuss the safeguarding policies in their country context to ensure comprehensive understanding of the policies.
- 4.12 A training package will be developed to train staff members and partners in this policy (and accompanying policies) as well as to explore gender, power and privilege within the organisation, in the community served, as well as the relationship between the two.
- 4.13 Each AA country office and AAI GS hub office will be required to run an annual session with all staff, board members and volunteers, and a record of this must be kept and submitted to the AAI International HR head.
- 4.14 Each ActionAid country office and AAI GS hub office will appoint a female safeguarding lead to roll out the policy, inductions and training.
- 4.15 All ActionAid offices will endeavour to fund, or partially fund, a safeguarding lead. Safeguarding should not be seen as a voluntary role.
- 4.16 The AAI Federation will invest in ensuring at least 2 HR professionals in the organisation are comprehensively trained on investigations and able to deploy to countries to support case management of complaints with an appropriate in-country team..

5. Reporting of SEA

ActionAid will ensure that the safety, dignity and rights of the survivor are respected at all times including during reporting, investigation and in the provision of assistance.

All development and humanitarian programmes will include community based complaints mechanisms and reporting processes that are designed in collaboration with communities, and transparent and accessible to the communities being supported. ActionAid will work in partnership with other protection agencies and service providers to ensure adequate referral pathways to support survivors, particularly in humanitarian settings.

All reporting of SEA concerns or suspicions should be reported immediately in the country where the exploitation/abuse has occurred. Whereby there is no ActionAid country presence, such concerns should be raised with the GS Global Safeguarding lead. All staff, volunteers, interns, board members, partners and consultants have a responsibility to raise concerns swiftly in order for Actionaid to take the necessary action as appropriate and necessary.

Each country will designate a trained female member of staff working at a senior level who will confidentially receive and process complaints in line with the wishes of the complainant and in accordance with Standard Operating Procedures (to be defined). The role will not be voluntary but a core part of the post holders job description. Also in line with good practice, there will be a confidential email address for concerns that will be monitored only by the Global Safeguarding Lead and female staff member in AAI GS HR. This system will also include an ability to report anonymously and investigation methods for anonymous complaints will be included in the Standard Operating Procedures (see the ActionAid Whistle Blowing Policy for further details). The complainant will be provided with reassurance that there is no danger of retaliation and that the matter will be treated with strict confidentiality.

ActionAid commits to creating an organisational culture at all levels that encourages complaints and deals with them swiftly and in line with this policy.

6. Dealing with complaints of SEA

The senior staff member who has received the complaint will follow Standard Operating Procedures to handle the complaint which will include the following:

- 6.1 SEA complaints will be treated in a safe, transparent and confidential way, including the involvement of a third party when applicable;
- 6.2 In cases where children (defined as individuals below the age of 18 years) have been victims of SEA, this will be dealt with under the Child Protection Policy.
- 6.3 Only trained staff will investigate allegations of sexual exploitation and abuse (SEA).
- 6.4 If the complaint is against the senior member of staff identified to receive complaints, the complainant can use the alternative identified mechanisms (email address, direct complaint to global safeguarding lead).
- 6.5 Raising the complaint confidentially with the Country Director (if they are not the person already receiving the complaint) who will inform AAI HR (maintaining confidentiality and following due legal processes as appropriate) and local/national authorities in line with the wishes of the complainant.
- 6.6 If the staff member who receives or makes the complaint genuinely believes that following the Standard Operating Procedures will compromise the outcome of the complaint, or put the complainant at further risk, or that he or she would be victimised, the complaint will be raised directly with the Global Safeguarding Lead.
- 6.7 If the complaint is against someone who does not work directly for ActionAid but for another humanitarian agency, that agency will be informed through established mechanisms or other identified appropriate channels. If the complaint is against a staff

member of a partner organisation this will be dealt with through the Country Director and the Global Safeguarding Lead.

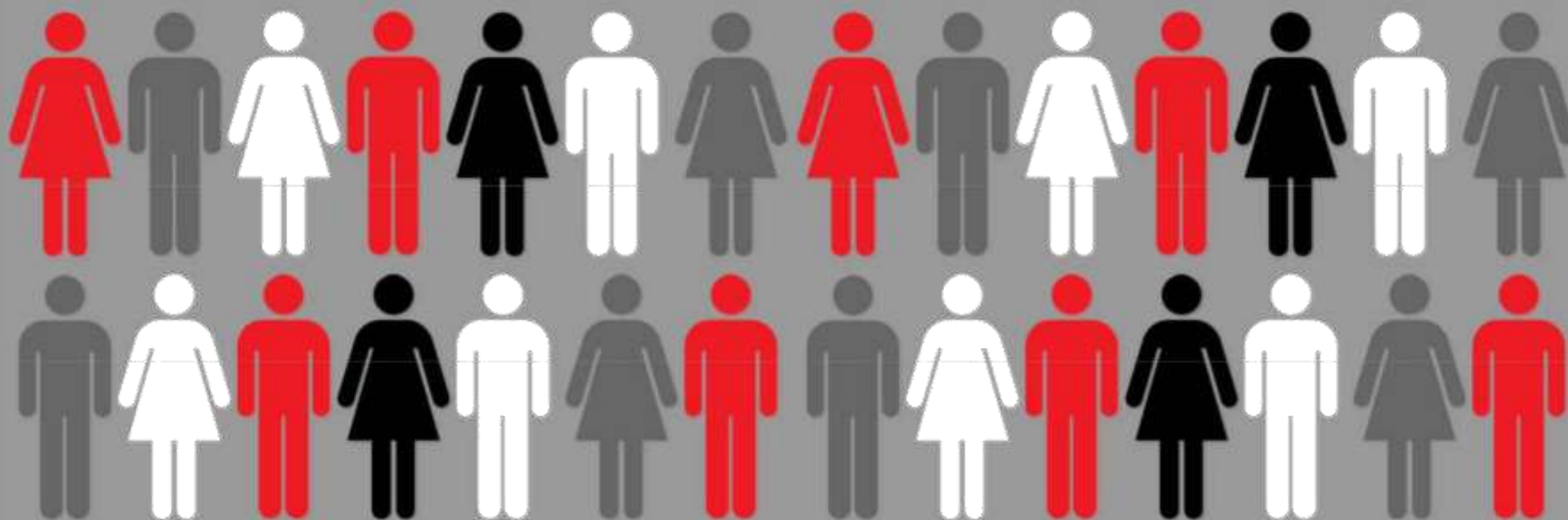
6.8 The complainant will be clearly informed of all steps taken to deal with the complaint.

6.9 Complainants will be offered confidential psychosocial wellbeing support as appropriate and necessary.

6.10 ActionAid recognises sexual exploitation and abuse as gross misconduct and perpetrators will face disciplinary action, including immediate termination of employment and referral for criminal prosecution, where appropriate.

6.11 Staff can be disciplined for failing to comply with this policy

ACTIONAID INTERNATIONAL CODE OF CONDUCT



1. INTRODUCTION

ActionAid is committed to ensuring that all staff members behave in a reasonable manner that respects and protects both the vulnerable people we work with and each other and in line with the feminist principles and values that ActionAid adheres to. In addition, all staff are ambassadors of ActionAid and their actions and behaviours can enhance or hinder the reputation of the organisation. For these reasons, Action Aid's Code of Conduct is binding to all staff across the Federation. The Code of Conduct will also be used as the basis of induction, training and refresher discussions in order to have a continuing impact on cultural change.

ActionAid's Code of Conduct provides clear guidance, and outlines examples of conduct that are considered unacceptable. This is not an exhausted list and covers anyone representing ActionAid; staff, volunteers (including board and assembly members), consultants, interns, visitors, dependents accompanying staff while working for ActionAid, and other individuals representing ActionAid, such as partners working in communities.

Throughout the Code of Conduct where the word "staff" is used, this should be taken to include all the above-mentioned people.

The code of conduct is to be made public so that the communities we work with can report concerns or anyone not adhering to the code of conduct including how and to whom they can report any misconduct or non-compliance committed by ActionAid staff or representatives.

The Code of Conduct is a binding document:

If you fail to adhere to any of the provisions set out in this document you can face disciplinary action, dismissal or even legal action.

You are obliged to read and fully understand the content of the document. If you have any questions please ask your line manager or your local HR representative staff for guidance.

All reports and concerns will be fully considered and treated with discretion. ActionAid will take all necessary steps to protect staff or others reporting possible breaches of this Code.

If you are a manager, you will have particular responsibilities to set a good example and to create a working environment conducive to upholding the standards in the Code of Conduct

2. ACTIONAIDS CODE OF CONDUCT

Staff members are responsible for managing their behaviour both in and out of work in accordance with ActionAid's values, policies and procedures and this Code of Conduct.

Recognising my power and privilege

- I will be mindful of the power and privilege that I hold in relation to other staff, community members and partners I work with.
- I will not raise the expectations of communities, partners or other third parties I engage with and will be honest in

terms of how much ActionAid can support through its services and resources.

Protecting the safety and wellbeing of oneself and others – this means that I will adhere to ActionAid's Global Security Management Policy and, my country specific Staff Health and Security policies.

- I will adhere to all legal and organisational health and safety requirements at the location of my work and when I travel within or outside my duty station/country.
- I will be supportive and where reasonable help ensure the safety, health and wellbeing of my colleagues and be pro-active in raising any concerns related to this to management in a sensitive and confidential manner.
- I will respect the privacy of colleagues, staff, partners and community members and will not share their confidential or personal information without their consent

Demonstrating Mutual Respect– means that I will recognise the innate worth and experiences of all people and the value of diversity by respecting the rights of all persons regardless of their race, age, gender, gender identity, sexual orientation, culture, dress, language, political affiliation, health status, colour, class, caste, ethnicity, marital status, disability, location, pregnancy, and religion.

- I will act fairly, honestly and thoughtfully and treat all people with dignity and respect.
- I will respect the national law and local culture, traditions, customs and practices of the country I am working in where they are not in conflict with ActionAid's values.
- I will not take part in any form of discrimination, bullying and harassment, or abuse (physical, sexual or verbal), intimidation, humiliation, shaming or exploitation, or in any other way infringe the rights of others. Please refer to *ActionAid's Anti- Sexual Harassment Policy and Procedures* for details and your country's *Bullying and Harassment Policy*.

Maintaining high standards of personal and professional conduct – this means that I will always aim to achieve the best in my work, take full responsibility for my actions and not abuse my position of power as an ActionAid representative.

I will embrace and promote accountability and pro-actively make myself available to be held to account and strive to improve practicing transparency, participation, compliance, evaluation and learning.

- I will not behave in a way that undermines my ability to do my job or is likely to bring ActionAid into disrepute.
- I will be mindful about perception and appearance in my language, actions and relationships with all staff, Board members and members of the community I am working in, both in and outside of work.
- When working or travelling on behalf of ActionAid, I will observe all local laws and be sensitive to local customs.
- I will abide by the terms of *ActionAid's Safeguarding policies*.
- I will not engage in sexual relations with a vulnerable adult or anyone under the age of 18. A minor is taken to be anyone under the age of 18 (or older if stipulated in local legislation) regardless of local custom.
- I will not knowingly abuse or exploit any person in any way.
- I will abide by the terms of *ActionAid's Anti-Sexual Harassment Policy and Procedures*.
- I will not exchange money, employment, goods or services for sexual favours.
- I will not work whilst under the influence of alcohol or drugs, or being in possession of it during work.
- I will not profit from the sale of any other illegal goods or substances whilst employed by ActionAid.

- I will not ask for or invite any personal payment, service from others, especially from the communities we work in, in return for ActionAid's help or not withhold, support, goods or services of any kind.
- I will not accept bribes or significant gifts (except small tokens of appreciation which I have declared) from governments, communities, donors, suppliers or others which have been offered as a result of my employment.
- I will not be part of or allow involvement in any activities that contravene human rights or those that compromise the work of ActionAid.
- I will adhere and align to AAI values¹ of Mutual Respect, Equity and Justice, Integrity, Solidarity with People Living in Poverty and Exclusion; Courage of Conviction, Independence from any religious or party-political affiliation and Humility.

Personal conduct outside of work – this means that I understand that I will be seen as a representative of ActionAid both during and outside of working hours and any social or work events.

- ActionAid does not intend to dictate how staff conduct their personal lives, however, unlawful or other behaviours, as outlined within this Code, by ActionAid staff which may bring

¹ AAI values as per Strategy 2028 : **Mutual Respect**, requiring us to recognise the innate worth of all people and the value of diversity; **Equity and Justice**, requiring us to ensure the realisation of our vision for everyone, irrespective of gender, sexual orientation and gender identity, race, ethnicity, caste, class, age, HIV status, disability, location and religion; **Integrity**, requiring us to be honest, transparent and accountable at all levels for the effectiveness of our actions and our use of resources and open in our judgements and communications with others; **Solidarity with People Living in Poverty and Exclusion** will be the only bias in our commitment to the fight against poverty, injustice, and gender inequality; **Courage of Conviction**, requiring us to be creative and radical, bold and innovative - without fear of failure - in pursuit of making the greatest possible impact on the causes of poverty, injustice, and gender inequality; **Independence** from any religious or party-political affiliation and **Humility**, recognising that we are part of a wider alliance against poverty and injustice

ActionAid's reputation into disrepute, or which may jeopardises its position, or the security of ActionAid and its staff whether during or after office hours will be considered as non-compliance of this Code and will be subject to performance management and or disciplinary procedure.

Protection and use of ActionAid's assets, resources, and information – this means that I will handle ActionAid's finances, assets, information and other resources with care and protect them from avoidable theft, fraud or other damage, or exposure to unauthorised people.

- I will ensure that I use ActionAid information, funds and resources entrusted to me in a responsible and confidential manner and I agree to account for all money and property in my care.
- I will be responsible for ensuring value for money in line with our commitment to promote simplicity by being cost effective in how we use ActionAid's money and resources.
- I will follow the appropriate ActionAid policy, procedures and technical guidelines in managing and using these funds and resources.
- I will not use the organisation's computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to, pornographic, defamatory, abusive, sexist, prejudice or racist messages.
- I will ensure that my behaviour when I am allowed to use ActionAid equipment for personal use (including but not limited to vehicles, accommodation and computers) does nothing to misuse or damage the reputation of the organisation.
- I will not release any private or confidential information relating to ActionAid, its staff members or beneficiaries/communities to others unless it is a requirement of my job or I am legally

required to do so. Please refer to *ActionAid's Open Information Policy*.

Avoiding conflicts of interest and duty – this means that I will be transparent and honest in all my dealings with ActionAid, and not pursue personal, professional or family gain or advantage in such dealings.

- I will declare to ActionAid any connections including personal affiliation with family members, friends or business with other parties that may constitute a conflict of interest, and duty and ensure that my work does not benefit any such connections.
- I will not enter into any sort of business relationship on behalf of ActionAid with family, friends or other personal/professional contacts for the supply of any goods or service to ActionAid or any employment related matters without authorisation from senior management.
- I will not directly line manage a person whom I have a personal (intimate) relationship with, and to avoid any conflict of interest at work or within teams including power differentials will declare and raise any potential issues related to this with my line manager.
- I will not accept any additional employment or consultancy work outside of ActionAid that is a potential conflict of interest without prior permission from management.
- I recognize that there is an inherent conflict of interest and potential abuse of power in having sexual relations with ActionAid staff and volunteers. Should I find myself in such a relationship, I will advise my manager immediately and resolve any conflict of interest without delay.

FOR MANAGERS

- I have particular responsibilities to set a good example when it comes to my behaviour both on and off duty.
- I will not engage in or tolerate any form of abuse, discrimination or harassment in the workplace.
- I will encourage and be open to views of all team members. I will provide timely feedback on the performance of each team member through guidance, motivation and full recognition of their merits.
- I will ensure there is budget and support available for the safeguarding and wellbeing of staff, and beneficiaries
- I will ensure that the security of staff is planned, and budgeted for in accordance with the Global Security Policy.

Reporting any incident or concern relating to this Code of Conduct – this means that I will raise any potential incident, abuse or concern that I witness or I am made aware of to the appropriate management, using the relevant/country specific procedures.

- I understand that all individuals working for ActionAid have the right to approach a higher authority at ActionAid about abuses or any breaches of this Code.

- I will ensure that all information about breaches of this Code are handled confidentially and with discretion.
- I am aware that all suspected breaches of the code will be thoroughly investigated and treated with the utmost confidentiality in accordance with the appropriate ActionAid procedures.

Compliance to this Code of Conduct – this means that I will comply fully with this Code and am aware of the potential outcome if I do not.

- I understand that should the Code of Conduct demand a higher standard than the local laws then this Code will prevail.
- I understand that failure to comply with any aspect of ActionAid's Code of Conduct may result in disciplinary action.
- I am aware that ActionAid may choose or (and in some cases be obliged) to report to the relevant professional or government authorities any instances wherein the law has been or suspected to have been broken.
- I am aware that ActionAid also adheres to the IFRC/ICRC Code of Conduct² that is applicable in all humanitarian/conflict contexts

Your employment and engagement with ActionAid is conditional on you signing and therefore agreeing to this Code of Conduct and its contents.

As an Action Aid stakeholder (staff, volunteer intern, partner, board member, consultant et al); I am obligated to report any observed violation of the code in a timely manner to my line manager or the lead safeguarding focal person in my country, or to the following address: safeguarding@actionaid.org.

I confirm that I have read, understood ActionAid's values, attitudes and behaviours and accept this Code of Conduct.

NAME: _____

SIGNED: _____

DATE: _____

Please return this page to your Human Resources department once signed and dated.