



## **ACWW Safeguarding Policy**

*Approved by the Board on 27 August 2024*

### **1. Introduction**

Associated Country Women of the World (ACWW) is the largest rural women's organisation operating globally. ACWW has millions of members worldwide across 60 countries. ACWW works to bring together rural women and their organisations all over the world, and in so doing address the challenges they face as a result of the isolation of their communities, discrimination against women, and their lack of standing in political processes.

ACWW's membership spans 60 countries, and since 1947 we have passed more than 180 policy resolutions by popular vote. The key concept behind each of these is the empowerment of rural women in all their diversity. This continues to be our driving priority.

This policy applies to all ACWW Members, Staff, the Board of Trustees, volunteers, contractors/trainers, and anyone working for or on behalf of Associated Country Women of the World. It also applies to other Third Parties including individuals, Beneficiaries, Grantees, consultants and agencies.

### **2. What is safeguarding**

#### **Definition.**

Safeguarding is the duty to take all reasonable measures to prevent, protect and respond to harm, especially that of sexual exploitation, abuse and harassment to any individual.

#### **Rules.**

ACWW Members, Staff and Third Parties must not engage in any form of sexual exploitation, abuse or harassment of any person of any age. ACWW Members, Staff and Third Parties must not have sexual relations with Children (defined as under 18 years old) or with Beneficiaries (in exchange for assistance or payment or for any other reason). ACWW Members, Staff and Third Parties must not exchange money, offers of employment, goods or services for sex or sexual favours, nor any other forms of humiliating, degrading or exploitative behaviour within the course of their engagement with ACWW. ACWW Members and Staff must always report safeguarding breaches to at least one of the ACWW Safeguarding Lead, ACWW Board Lead on Safeguarding, or Executive Director.

#### **Risks.**

Physical and emotional harm (Individuals) – Individuals who are victims of sexual exploitation, abuse or harassment are subjected to physical and emotional harm. This is the greatest risk that must be mitigated.

Reputational harm – As a result of negative publicity if anyone acting on behalf of ACWW is implicated in any safeguarding issue. This can lead to loss of members, donors and/or funders and/or damage to the continued activities of ACWW.



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**Delivery Risk** – Projects may be closed down resulting in Beneficiaries not being able to benefit from them.

**Criminal liability (Individuals)** – Individuals found guilty of sexual exploitation, abuse or harassment offences can face criminal charges in addition to being subject to disciplinary action by ACWW.

A comprehensive list of safeguarding risks is held by ACWW Central Office.

### 3. Purpose

The purpose of this Policy is to:

- communicate clearly ACWW's safeguarding commitments, particularly in relation to staff travel
- set out ACWW's responsibilities, as well as the responsibilities of its Staff and Third Parties and anyone who acts on behalf of ACWW, in observing and upholding ACWW's position on safeguarding and to ensure compliance with applicable laws and ethical standards;
- provide information and guidance on how to recognise and deal with instances of sexual exploitation, abuse and harassment; and
- instil a culture where safeguarding is promoted.

### 4. Scope and Accountability

This policy applies to all ACWW Members, Staff, the Board of Trustees, volunteers, contractors/trainers, and anyone working for or on behalf of Associated Country Women of the World. It also applies to other Third Parties including individuals, Beneficiaries, Grantees, consultants and agencies.

### 5. Roles and Responsibility

#### Who is responsible for the Policy?

The overall responsibility for adherence to this policy is with the Executive Director who is accountable to the Board of ACWW.

The Executive Director shall delegate primary day-to-day responsibility for the implementation of this policy to the Safeguarding Lead who shall also monitor its use and effectiveness and deal with any queries on its interpretation. ACWW line managers with direct reports at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

The Board of Trustees have appointed a Board Lead for Safeguarding to ensure adequate governance oversight and to provide support to the Executive Director and the Safeguarding Lead in the development, monitoring and implementation of this Policy.



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### Responsibilities for managing safeguarding risks

ACWW Members and Staff are often its first line of defence against sexual exploitation, abuse and harassment offences. All ACWW Staff, in particular, have a general responsibility to immediately report any act of attempted or detected sexual exploitation, abuse or harassment. This includes reasonable suspicion of attempted sexual exploitation, abuse or harassment anywhere within ACWW's global operations. The process for raising concerns and how they will be dealt with is outlined separately in **Section 7** below.

Group/Stakeholder	Responsibility
ACWW Members, Staff and Board	<p><b>Must not:</b></p> <ul style="list-style-type: none"> <li>• Engage in sexual activity with any person under the age of 18, regardless of the local age of consent or any mistaken belief held by the ACWW Staff as to the age of the person.</li> <li>• Engage in transactional sex when working in the international aid context and specifically in the context of ACWW's operations, which shall include but not be limited to the exchange of money, employment, goods or services for sex, irrespective of it being engaged in outside work hours. For the purposes of this policy, "Sex" includes sexual favours or any form of humiliating, degrading or exploitative behaviour of a sexual nature.</li> <li>• Sexually exploit, abuse or harass another individual.</li> <li>• Engage in any commercially exploitative activities with children including child labour or trafficking.</li> <li>• Engage in any sexual relationships with ACWW Beneficiaries related to any ACWW programme, since any such relationship is likely to be based on inherently unequal power dynamics.</li> <li>• Use unequal power relationships for personal gain.</li> </ul> <p><b>Must:</b></p> <ul style="list-style-type: none"> <li>• Contribute to an organisational culture where promoting the welfare of individuals through safeguarding is a priority by:             <ul style="list-style-type: none"> <li>○ creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this policy;</li> </ul> </li> </ul>



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	<ul style="list-style-type: none"> <li>○ reporting any concerns or suspicions relating to safeguarding violations by an ACWW Staff member or Third Party to the Safeguarding Lead or an appropriate safeguarding focal point such as a line manager and Board Lead for Safeguarding;</li> <li>○ undertaking safeguarding training as required by ACWW;</li> <li>○ seeking guidance and advice if unsure about a potential breach of this policy; and</li> <li>○ notifying ACWW of any criminal prosecutions during employment or prior to employment.</li> </ul>
ACWW Staff with management responsibility	<p>Must:</p> <ul style="list-style-type: none"> <li>• Ensure that ACWW's Staff and Beneficiaries are made aware of the provisions of this policy to ensure that they have the confidence and ability to report any concerns or incidents of safeguarding violations.</li> <li>• Support and develop systems that maintain an environment which is safe for all and prevents safeguarding violations.</li> <li>• Be accountable for ensuring this policy is fully embedded within their areas of responsibility.</li> </ul>
Safeguarding Lead	<p>Must:</p> <ul style="list-style-type: none"> <li>• Act as a focal point within ACWW for all safeguarding concerns.</li> <li>• Develop and maintain effective controls to prevent and detect safeguarding offences.</li> <li>• Develop and plan training sessions for all ACWW Staff on safeguarding.</li> <li>• Coordinate rigorous and prompt investigations if a safeguarding offence occurs.</li> <li>• Record and monitor all reported safeguarding complaints and concerns.</li> <li>• Promptly report in writing any complaints, concerns and incidents regarding sexual exploitation, abuse or harassment, or any attempted or threatened sexual exploitation, abuse or harassment to ACWW Board Lead for Safeguarding and the Executive Director, and then when appropriate to the relevant</li> </ul>



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	ACWW funders and donors, and where necessary to the appropriate authorities.
Executive Director	<p>Must:</p> <ul style="list-style-type: none"> <li>• Work with the Safeguarding Lead and ACWW Board Lead for Safeguarding (where necessary) to coordinate rigorous, prompt and fair investigations if a safeguarding offence occurs.</li> <li>• Advise the Board's Executive Committee on appropriate legal and/or disciplinary action against perpetrators of safeguarding offences.</li> <li>• Implement disciplinary action where supervisory failures have contributed to the commission of safeguarding offences.</li> <li>• Establish and maintain systems for recording and subsequently monitoring all discovered cases of safeguarding offences.</li> </ul>
Board Lead for Safeguarding	<ul style="list-style-type: none"> <li>• Act as a focal point within the ACWW Board for all safeguarding concerns.</li> <li>• Work with the Safeguarding Lead to develop and maintain effective controls to prevent and detect safeguarding offences.</li> <li>• Work with the Safeguarding Lead and Executive Director to coordinate rigorous, prompt and fair investigations if a safeguarding offence occurs.</li> <li>• Work with the Executive Director to advise the Board's Executive Committee on appropriate legal and/or disciplinary action against perpetrators of safeguarding offences.</li> </ul>
Area Presidents	<p>Must:</p> <ul style="list-style-type: none"> <li>• When relevant, put in place local procedures that are consistent with this policy which outline the reporting requirements and the manner in which they are escalated within each ACWW Area, with appropriate support from the Safeguarding Lead and Board Lead for Safeguarding.</li> </ul>
Third Parties	<p><b>Must take reasonable measures to ensure that their personnel do not:</b></p> <ul style="list-style-type: none"> <li>• Engage in sexual activity with any person under the age of 18, regardless of the local age of consent or any mistaken belief as to the age of the person.</li> </ul>



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## 6. ACWW's approach to mitigating the risks of sexual exploitation, abuse and harassment

### Prevent

#### *Risk Assessments and Onboarding*

ACWW project managers should conduct programme risk assessments relating to safeguarding risks specifically. It is important to keep programme risk registers up-to-date and conduct a safeguarding risk assessment at least annually.

#### *Screening and Background Checks*

Pre-employment background checks on ACWW Staff are an important part of preventing sexual exploitation, abuse and harassment as one of the objectives of these checks is to understand whether an individual has perpetrated or been linked to any prior safeguarding offences in the past. Recommended checks would include checking previous employer references.

#### *Third Party Screening and Background Checks*

Pre-contracting background checks on Third Parties are an important part of preventing sexual exploitation, abuse and harassment as one of the objectives of these checks is to understand whether a Supplier or other Third Party has perpetrated or been linked to any prior safeguarding offences in the past.

#### *ACWW Codes of Conduct*

ACWW's (Staff and Board) Codes of Conduct are at the forefront of embedding and maintaining a culture of ethical conduct at ACWW. Policies such as this one help ensure that safeguarding awareness is maintained and processes are in place.



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### *Grantee & Supplier Codes of Conduct*

ACWW's contracts with its third parties contain safeguarding clauses which help protect ACWW in the event that the Third Party breaches this policy. The ACWW Grantee & Supplier Codes of Conduct commits ACWW's Third Parties to acting ethically and not engaging in sexual exploitation, abuse and harassment.

### *Acknowledging safeguarding risks and training*

It is the responsibility of all ACWW Staff to ensure that they understand this policy and any wider ACWW policies (e.g. Anti-Bullying and Harassment Policy) dedicated to mitigating the risks of sexual exploitation, abuse and harassment and to attend all training sessions (including e-learning) offered in relation to these policies. All managers are responsible for mitigating safeguarding risks on their programmes, by including relevant training for new joiners.

## **Detect**

### *Staff and Third Party Screening and Background Checks*

In addition to preventing sexual exploitation abuse and harassment, third party screening and background checks will help ensure that any relevant prior offences are detected. Screening ACWW's Staff and Third Parties ensures that appropriate measures are taken to understand whether they pose any safeguarding risk (e.g. modern slavery risks within ACWW's supply chain).

### *Ongoing programme monitoring*

Incorporating monitoring into projects where there a high safeguarding risk has been identified is important.

### *Awareness and reporting*

All ACWW Staff are responsible for remaining alert to any red flags related to safeguarding risks (e.g. especially vulnerable Beneficiary groups such as Children, projects that operate in very remote locations etc). ACWW Staff must report any actual or suspected instances of sexual exploitation, abuse and harassment through management reporting lines.

## **Respond**

### *Investigations*

ACWW is committed to thoroughly investigating all reports of sexual exploitation, abuse and harassment that it may receive the rough internal management channels or directly from external stakeholders. Where ACWW Members, Staff or Third Parties are suspected of committing sexual exploitation, abuse or harassment they will be subjected to an investigation with potential disciplinary action as appropriate. ACWW commits to handling investigations promptly and thoroughly whilst always placing the wellbeing of the victim as its utmost priority.

### *Disciplinary measures*

ACWW will take the appropriate disciplinary measures, including dismissal for gross misconduct, against any ACWW Staff or Members found to have breached this policy.





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### *Continuous improvement and strengthening policies and procedures*

ACWW will seek to learn the lessons from any breaches related to safeguarding and strengthen its policies and procedures in that regard.

## **7. How to report a violation of this Policy**

ACWW Members, Staff and Third Parties have a responsibility to report any actual or suspected wrongdoing related to safeguarding to their Line Manager, Safeguarding Lead, Executive Director, World President, Area President, or to the Board Lead for Safeguarding at the earliest possible opportunity.

Members or Staff who suspect safeguarding issues in any form or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. ACWW encourages those working for or with ACWW to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously, investigated as appropriate, and that their confidentiality will be respected.

Safeguarding is a highly sensitive area and confidentiality must be maintained to protect the victim and to protect against risks of defaming an individual linked directly or indirectly to a safeguarding investigation.

ACWW is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their concerns or suspicion that an actual or potential safeguarding violation has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Safeguarding Lead, Board Lead for Safeguarding, Executive Director, or World President immediately.

Once ACWW receives a safeguarding incident report or whistleblowing report it will acknowledge receipt, ask any follow up questions if appropriate and promptly begin an investigation. Depending on the gravity of the allegation, an investigation manager may be appointed to look into your concerns. The level of detail you are able to provide can greatly assist the speed and effectiveness of the investigation. Anonymous reports containing vague allegations and lacking in detail will be difficult, or even impossible, to investigate. Please use the Incident Reporting form in **Annex 2**, where possible.

Always remember to notify the Safeguarding Lead or Board Lead for Safeguarding of any suspicions of safeguarding violations where a Beneficiary project is involved. ACWW often has a duty to report safeguarding incidents to its funders and donors immediately. Our funders and donors are aware that safeguarding violations can occur in the countries where we operate, and expect ACWW to report such instances, as this demonstrates ACWW's ability to detect incidents and investigate them promptly and thoroughly.

## **8. Breach of this Policy**

Any Member or Staff member who violates their responsibilities as set out in the Roles and Responsibilities in **Section 5** above will be subject to investigation. The Staff member may face





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disciplinary action, which could result in dismissal for gross misconduct. The Member may face termination of membership from ACWW. In the event a violation is found to involve a criminal act, this could result in referral to the relevant authorities where it is reasonably considered to be safe to do so.

Where any Third Party violates their responsibilities as also set out in the Roles and Responsibilities in **Section 5** above, ACWW will be entitled to:

- terminate its contract with the Third Party with immediate effect by written notice;
- recover from the Third Party any loss resulting from the termination; and
- recover from the Third Party any loss sustained as a result of any breach of this policy, whether or not the contract is terminated.

### 9. Investigations

All safeguarding investigations should be conducted in accordance with the ACWW Staff Handbook.

No safeguarding investigations should take place without prior consent from the Executive Director and/or Board Lead for Safeguarding.

The Executive Director and Board Lead for Safeguarding, as appropriate, should be provided with regular progress updates on all investigations that they are not directly involved in. Where relevant, funders and donors or relevant Third Parties may also need to be kept informed.

The investigation team, or any accounting, legal or other professional services firms retained to conduct an investigation, may seek the assistance of ACWW Staff members, who have a duty to respond to such requests for assistance.

### 10. Monitoring and Review

The Executive Director and Working Group on Safeguarding will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering safeguarding violations.



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### Annex 1 – Glossary

Term	Definition
<b>ACWW</b>	Means the Associated Country Women of the World (ACWW), a charity registered in England and Wales.
<b>ACWW Members</b>	Means the individual and society members of the Associated Country Women of the World (ACWW), a charity registered in England and Wales.
<b>Beneficiary</b>	Anyone directly or indirectly receiving goods or services from any programme which ACWW has partial or full responsibility for implementing.
<b>Board Lead for Safeguarding</b>	The designated Board of Trustees member acting as a focal point for the Board on safeguarding concerns and complaints. Currently held by the chair of the Board Working Group on Safeguarding.
<b>Child (Children)</b>	In accordance with the United Nations Convention on the Rights of the Child, 'Child' means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, ACWW considers a child to be a person under the age of 18 years.
<b>Grantees</b>	Any organisation or individual receiving a grant from ACWW under its Rural Women in Action Fund (or any other form of grant recipient).
<b>Harassment</b>	Any conduct which annoys, threatens, intimidates, alarms, or puts a person in fear of their safety.
<b>Management Responsibility</b>	This includes staff with line management responsibility and/or staff who have management responsibilities on an ACWW project.
<b>Safeguarding Lead</b>	The designated Staff person acting as a focal point for safeguarding concerns and complaints. This role is currently held by the Projects Manager, who can be contacted at <a href="mailto:projects@acww.org.uk">projects@acww.org.uk</a>
<b>Sex</b>	For the purposes of this policy 'sex' includes sexual favours or any form of humiliating, degrading or exploitative behaviour of a sexual nature.
<b>Sexual Abuse</b>	The active or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions and all sexual activity with someone under the age of 18, regardless of local age of majority or consent under the laws of the territory in which it takes place and regardless of any mistaken belief by the relevant individual as to the age of the child.
<b>Sexual Exploitation</b>	Any active 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.



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<b>Sexual Harassment</b>	Unwanted conduct of a sexual nature, which is intended to, or has the effect of violating a person's dignity or creating an intimidating, hostile or offensive environment for them.
<b>Third Parties</b>	Any individual or organisation engaged with work or the provision of services to ACWW. This includes but is not limited to the following third parties and their employees: Beneficiaries, Subcontractors, Grantees, Associates, Suppliers, Intermediaries and Partners.
<b>Transactional Sex</b>	Transactional sex includes, but is not limited, the exchange of money, employment, goods or services for sexual services. For the purposes of this policy, it is irrelevant whether transactional sex is considered legal in the local jurisdiction and whether it is engaged in outside work hours, given the imbalances that can arise when working in the international aid context.
<b>Staff</b>	This includes but is not limited to: permanent and temporary ACWW employees and staff (including agency staff), ACWW consultants, ACWW volunteers, and ACWW interns.



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### Annex 2 – ACWW’s Safeguarding Incident Reporting Form

Area	Location
Funder / Donor	Project
Reported by	Reported about
Complaint Recipient	Investigated by
Type of Complaint (relevant policy area e.g. Code of Conduct)	
Date(s) of Incident(s)	
Summary of Facts	
Action taken to date	
Current status of investigation	
Communications required	



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Last review date:	August 2024
Last updated on:	August 2024
Author:	Safeguarding Lead
Policy owner:	Executive Director
Approver:	Safeguarding Working Group and ACWW Board
Who does this policy apply to:	All ACWW Members, Staff, Board and Third Parties.