



Safeguarding & Prevention of Sexual Exploitation & Abuse Policy

Managed on behalf of ED and Board by: Head of Programs

Approved by Board: 25 November 2023

1. Purpose

ActionAid Australia is a women's rights organisation working to advance social justice, gender equality and poverty eradication. In our humanitarian work, we seek to secure and protect women's rights in emergencies by promoting the leadership of women most affected in humanitarian crises and conflict. As a member of a global federation, we recognise that 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 (GBV), which is more likely to be experienced by women and girls.

This policy should be read and enforced together with **ActionAid Australia's Human Resources Manual** and **Child Protection Policy (2017)**, and **ActionAid International's Anti Sexual Harassment Policy (2018)**, **Whistle Blowing Policy (2008)**, **Child Protection Policy (2021)** and **Staff Code of Conduct (2018)**, which we are bound by as a member of the AAI federation. These specifically state 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, consultants and partner organisations) in all contexts, with specific attention to work in humanitarian settings. Together these policies enforce the safeguarding of all people ActionAid works with from any actions or behaviours that constitute SEA.

This policy is a **zero-tolerance** policy to any form of sexual exploitation and abuse. Anyone found to have engaged in this abuse will be dismissed and will not be hired again by ActionAid or any member of the Federation. When SEA involves the perpetration of a crime(s), the police in the country where the crime was committed will be informed, should the survivor choose to prosecute.

All ActionAid Australia representatives are required to sign an undertaking to comply with this Policy.

2. Scope

This policy applies to the following people:

- ActionAid Australia staff members, contractors, and consultants;
- ActionAid Australia office-based volunteers, interns and Grassroots Network activists;
- ActionAid Australia Board of Directors; and

- partner organisations.

3. 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 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 of a minor** - any penetration (however slight) of the vagina, anus or mouth of a person below the age of 18 at the time of the penetration with a penis or other body part. Also includes penetration of the vagina or anus with an object. Mistaken belief about the age of the person is not a defence.
- **Sexual assault of a minor** - any form of sexual contact that does not result in or include penetration with a person below the age of 18 at the time of the sexual contact. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks. Mistaken belief about the age of the person is not a defence.
- **Gender-based violence** - An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. The term 'gender-based violence' is primarily used to underscore the fact that structural, gender-based power differentials around the world place women and girls at risk for multiple forms of violence. This includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty, whether occurring in public or in private life. While women and girls suffer disproportionately from GBV, men and boys can also be targeted. The term is also used by some actors to describe targeted violence against lesbian, gay, bisexual, transgender and intersex (LGBTI) populations, in these cases when referencing violence related to norms of masculinity/femininity and/or gender norms.
- **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 community members 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:** any form of non-consensual physical contact 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 (this 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.
- **Fraternisation:** Any relationship that involves, or appears to involve, partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It could include sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.
- **Digital harassment, exploitation, and abuse** - Any form of harassment, exploitation and abuse that happens on the internet. These include:
 - Online grooming for sexual exploitation
 - Sexting
 - Commercial sexual exploitation e.g. obtaining child abuse material online, accessing dark web forums e.g. to profit from sexual exploitation and abuse
 - 'Revenge porn' - this involves the sharing of sexually inappropriate and explicit images of a person without their knowledge and consent.
- **Survivor** - A person who has experienced sexual abuse, exploitation, or harassment. The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency. ActionAid uses the term survivor as part of our survivor-centered approach as it emphasises the power of the individual, which the term 'victim' can remove, and their agency. However, it is important that those affected by sexual harassment, exploitation and abuse can choose the term they prefer.
- **Survivor-centred approach** - A safeguarding approach puts the survivor of violence or harm at the centre of any response and process. Recognising that violence, particularly sexual violence, is carried out in order to remove the power and agency of the person experiencing the harm, a survivor-centred approach works to place the power back with the survivor. Survivor-centred approaches must consider the rights, choices, dignity, confidentiality, and safety of the survivor. This ensures that the

survivor, their family, and their community do not come to any further harm as a result of having chosen to report an incident.

4. Principles

The following principles will guide ActionAid Australia in upholding its responsibility to safeguard and prevent sexual exploitation and abuse:

- ActionAid commits to uphold the highest level of personal and professional conduct among its staff, contractors, volunteers, board members, individuals visiting ActionAid programmes on approved visits, 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.
- ActionAid views any form of sexual exploitation and abuse as a gross violation of human rights.
- ActionAid recognises the *IASC Guidelines (2011)* and *Global Standard Operating Procedures (2016) on the Prevention of Sexual Exploitation and Abuse (PSEA)*.
- 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*, and **Standard 5**: *Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints*.
- ActionAid upholds the federation wide *Commitments to Women's Leadership, Rights and Protection in Emergencies (2016)* and the *Protection from Sexual Exploitation and Abuse Policy (2021)*
- 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 agencies;

ActionAid will promote cooperation and assistance between organisations in preventing and responding to SEA.

This policy is also informed by ActionAid's *Feminist Leadership Principles*, which are embedded in ActionAid Australia's safeguarding approach:

1. Self-awareness
2. Self-care and caring for others
3. Dismantling bias
4. Inclusion
5. Sharing power
6. Responsible and transparent use of power
7. Accountable Collaboration
8. Respectful Feedback
9. Courage
10. Zero Tolerance

5. Preventing & Responding to Sexual Exploitation & Abuse

5.1 Program Interventions

ActionAid Australia recognises that PSEA must be integral to its humanitarian and programming work and will work with program partners to ensure the following interventions are implemented:

- Ensure the active participation of the people we work with in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods;
- Work with partners to ensure that survivor-centred complaints reporting mechanisms are in place and are readily accessible by diverse community members that we work with, and actively engage them in the design of these mechanisms;
- Recognise that sexual exploitation and abuse is often grounded in gender and other inequalities, ActionAid will ensure that development and humanitarian activities draw on women's rights and intersectional feminist analysis.
- Ensure that SEA risks are being managed at project level as well as at organizational level. A clear risk assessment in place for all projects outlining sexual exploitation and abuse and safeguarding risks within the project and putting in place measures to address these in project plans and risk monitoring;
- Ensure that all responses are developed in a manner that balances respect for due process with prioritising the safety, dignity and rights of survivors;
- Integrate and mainstream PSEA into all development and humanitarian work, as well as promote standalone protection programming in humanitarian settings with clear complaints and reporting mechanisms;
- Ensure that assistance for those affected by violations is provided in a non-discriminating manner and in ways that prevent additional harm;
- Ensure that all staff, volunteers, contractors, consultants and partners are aware of the 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
- Ensure that a copy of this policy will accompany all partner Project Agreements and discussions held with partners to further embed understanding and compliance. Partners will be required to have an equivalent policy in place, or sign ActionAid's Policy and attached Code of Conduct if this is not in place.

Emergency Response

ActionAid will work with humanitarian response partners to consider safeguarding risks when developing and implementing disaster response activities as the potential for harm in disaster and emergency contexts is greatly increased. The following provisions during emergencies will be carried out to mitigate risk:

- Ensure that the PSEAH Policy is made available to all stakeholders involved in the emergency response, translated into a local language, and communicated to and understood by all stakeholders. This includes carrying out training, as appropriate, to ensure all ActionAid staff and other representatives are aware of our approach. Referral and support mechanisms should be mapped and provided to communities.
- HR should follow safer recruitment and selection procedures during an emergency. For example, the recruitment process will include questions regarding safeguarding for those working directly with children and communities.
- All EFAST (Emergency Fast Action Support Team) members will be expected to undertake SHEA and Safeguarding training prior to their deployment.

Data Collection and Protection

With the gathering, storing, or sharing of any data related to individuals and SHEA and Safeguarding for work-related purposes (such as fundraising, communications, and incident management), ActionAid representatives must:

- Explain to individuals and relevant community members involved in ActionAid programming while obtaining informed consent how ActionAid intends to use and store their data; and
- Comply with relevant Australian, local and international data protection laws.

5.2 Human Resources Interventions

ActionAid Australia will ensure that HR processes support the prevention of sexual exploitation and abuse in all development and humanitarian settings and upholds the survivor-centred approach through the following steps:

- ActionAid will champion and support meeting of 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.
- ActionAid will ensure that its own staff recruitment, including volunteers, consultants and interns will include reference and police checks, and ActionAid will not hire any person with a history of perpetrating any type of GBV or SEA.
- All interviews of new staff and other representatives will include a question that relates to their understanding of safeguarding and preventing sexual exploitation and abuse..
- ActionAid will ensure that hiring practices prohibit and prevent sexual exploitation and abuse from occurring during hiring. All personnel 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.
- All managers will be aware of the procedures outlined to deal with reported cases of SEA and inductions of staff will ensure awareness of this policy and complaints mechanisms.
- ActionAid Australia will conduct an annual session with staff, volunteers and downstream partners to continue to build awareness of the PSEA Policy and complaints mechanism and ensure compliance.
- ActionAid Australia and its partners will keep a training log to track attendance.
- ActionAid Australia will assign a staff person to a safeguarding lead, which will be reflected in their job description and work within the AAI federation to ensure best practice in safeguarding and PSEA.

6 Reporting Procedures

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.

ActionAid will work with partners to ensure all development and humanitarian programs include community-based complaints mechanisms and reporting processes that are designed in collaboration with communities and are transparent and accessible to the communities being supported. We will also work with partners to establish and identify adequate referral pathways to support survivors, particularly in humanitarian settings. Concerns can be raised

through a variety of ways to ensure accessibility and inclusivity – avenues of escalation include:

- Incident Report Form;
- Email;
- Letter;
- Phone call; and

Verbally. All staff, volunteers, interns, board members, partners and consultants have a responsibility to raise concerns.

All staff and other representatives are required to report if:

- They become aware that someone who is directly involved in ActionAid programming or belongs to a community where programming activities are implemented, is experiencing or at risk of experiencing sexual exploitation or abuse - whether carried out by ActionAid staff and representatives, or others.
- A staff member or other representative suspects that someone connected to ActionAid is suspected to be carrying out sexual exploitation and abuse towards direct community members or someone not connected to ActionAid.

All reporting of SEA concerns or suspicions will be reported immediately in the country where the exploitation/abuse has occurred in line with the ActionAid International Policy and to the Executive Director, Chief Operating Officer, or Safeguarding Focal Point of ActionAid Australia to be included on the Incident Reporting Register. Those working with ActionAid Australia will also be made aware of the confidential email address for complaints to be able to report anonymously should they prefer this method.

The complainant will be provided with reassurance that there is no danger of retaliation and that the matter will be treated with strict confidentiality. In line with ActionAid's survivor-centred approach, the person who is alleged to have experienced the harm can choose if, when, and how they want to report the incident. There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed but ActionAid will take every reasonable and practical measure to address the concern.

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

- AAI Global SHEA and Safeguarding Team (safeguarding@actionaid.org)
- AAI Whistleblowing Service (whistleblowing@actionaid.org)

The Safeguarding Focal Point is responsible for reporting all concerns and complaints to the Global SHEA and Safeguarding Team to ensure that the Global Team has oversight of all SHEA and Safeguarding concerns in the Federation. The Safeguarding Focal Point must complete a SHEA and Safeguarding Incident Reporting Form and send this to safeguarding@actionaid.org (Refer to Annexure B – Reporting Flowchart). The Global SHEA and Safeguarding Team will support the Focal Point and ActionAid country on a case by case basis to respond to all concerns and complaints raised, and monitor action taken.

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

7 Complaints Handling Procedures

ActionAid's Complaints Handling Procedures are aligned with our survivor centred approach, which upholds the survivor's wishes and needs. ActionAid recognises how trauma can impact on survivors and commits to measures that will prevent the re-traumatisation of survivors.

For any complaint that is surfaced directly with ActionAid Australia, the staff member who has received the complaint will inform the Executive Director of ActionAid Australia, Chief Operating Officer or Safeguarding Focal Point, who will follow ActionAid International's Standard Operating Procedures to handle the complaint which will include the following:

- SEA complaints will be treated in a safe, transparent and confidential way.
- Decisions will be made in the best interests of children, consulting with them in decisions affecting their lives and collaborating with actors trained to handle the special needs of child survivors of sexual abuse. If the complaint involves harm to children, this will be dealt with under the Child Protection Policy.
- Only trained staff will investigate allegations of sexual exploitation and abuse (SEA).
- If the complaint is against a senior member of staff identified to receive complaints, the complainant will be encouraged to report directly to the Global Safeguarding Lead.
- Raising the complaint confidentially with the Executive Director (if they are not the person already receiving the complaint) where the incident has occurred who will inform AAI (maintaining confidentiality and following due legal processes as appropriate) and local/national authorities in line with the wishes of the complainant.
- 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 she would be victimised, the complaint should be taken up directly with the Global Safeguarding Lead.
- If the complaint is against someone who does not work directly for ActionAid but for another humanitarian agency, ActionAid will inform the agency through their established mechanisms or other appropriate channels if mechanisms do not exist.
- If the complaint is against a staff member of a partner organisation this will be dealt with through the Executive Director.
- The complainant will be clearly informed of all steps taken to deal with the complaint.
- Complainants will be offered confidential psychosocial wellbeing support.
- 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 and in accordance with established procedures.
- Staff can be disciplined for failing to comply with this policy in accordance with established procedures.

For responding to concerns and complaints, the following steps will be taken:

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

- Within 24 hours, the complaint is acknowledged by either the Safeguarding Focal Point, Chief Operating Officer, or Executive Director, and the complainant is

communicated with to ensure their immediate safety and that any immediate support can be provided. The Safeguarding Focal Point must complete the SHEA and Safeguarding Incident Reporting Form and send this to safeguarding@actionaid.org to inform the Global SHEA and Safeguarding team

- For any complaints relating to ActionAid staff or DFAT-supported partner organisations, reporting to DFAT must be done within two working days of ActionAid becoming aware of the alleged incident. DFAT's Sexual Exploitation, Abuse and Harassment Incident Notification Form (found here www.dfat.gov.au/pseah) must be completed and sent to seah.reports@dfat.gov.au.
- For suspected non-compliance to DFAT's PSEAH Policy by ActionAid representatives and DFAT-supported partner organisations, reporting must be done to DFAT within five working days.
- For the investigation of concerns and complaints, the Safeguarding Stakeholder Panel must be convened, within 48 hours of the complaint being raised, with its composition including at a minimum the Safeguarding Focal Point, the Executive Director, and the Chief Operating Officer. The Safeguarding Stakeholder Panel will:
 - Create the Terms of Reference (TOR) for the investigation,
 - Appoint an Investigation Team who will carry out an investigation and produce a report for decision making by the Safeguarding Stakeholder Panel and taking forward any actions,
 - The Safeguarding Stakeholder Panel must ensure that there is no conflict of interest, and that these individuals have the training and awareness to carry out the task (e.g. training on Safeguarding, gender justice etc)
 - Take responsibility for overseeing the process and ensuring that all investigations are carried out in line with ActionAid's values and that a fair process is carried out for all.
 - The Safeguarding Focal Point is responsible for ensuring that each case is documented in its entirety, that all activities are undertaken in line with ActionAid's SHEA and Safeguarding approach, and for updating the Global Safeguarding Team on the case and outcomes.

The Stakeholder Panel will uphold ActionAid's survivor-centred approach by ensuring the survivor of subject of concern are updated throughout the Investigation process.² Investigation (up to 4 weeks, depending on the nature and complexity of the case)³. Decision made and investigation outcomes shared with the survivor and subject of concern. The survivor and subject of concern will be informed within 1 week of the decision made. The survivor and subject of concern have a right to appeal the decision by escalating to the Global SHEA and Safeguarding team. ActionAid will ensure that appropriate support is made available where the need is identified.

8 Monitoring and Review of Policy and Procedure

The Head of Programs is accountable to the Executive Director and Board for managing and maintaining this policy. All members of the Leadership Team are accountable for ensuring that their functional teams understand and adhere to this policy in their day-to-day work. Where compliance issues are surfaced, Leadership Team members will work with staff to address these issues promptly. Any updates/revisions to the policy must be endorsed by the Executive Director and Leadership Team before being submitted to the Board for its approval. This Policy should be reviewed and updated every three years.

Annexure A**Safeguarding and Prevention of Sexual Exploitation and Abuse Policy Code of Conduct**

All ActionAid Australia representatives (as defined in Section 2 of this Policy) will conduct themselves in a manner that upholds the protection, dignity, and rights of people. In line with the principles of such behaviour outlined in Section 4 of this Policy, ActionAid Australia strictly prohibits:

1. Staff and other representatives from engaging in any form of sexual activity including sexual or romantic relationships with rights holders (people involved directly in any ActionAid programming activities);
2. Sexual and romantic relationships that arise out of the working relationship between ActionAid and rights-holders and community members who are either directly or indirectly involved in current ActionAid programming activities), due to imbalances of power. ActionAid representatives will be held accountable for inappropriate relationships with community members and rights holders;
3. Relationships or any kind of sexual activity with community members who are not rights holders (i.e. not receiving direct assistance from ActionAid or involved directly in any programming activities) are not prohibited however, staff and other representatives must ensure the relationship is not and could not be perceived to be exploitative or abusive. Such relationships must be raised with a Line Manager/Country Director/Executive Director as soon as possible so that they can work with the staff member to manage the potential risks. Part of this risk assessment should include consideration of how the relationship could be perceived by the community, and whether this could cause a reputational risk for ActionAid. This will be managed on a case-by-case basis.
4. Staff and other representatives from buying sex. In recognition of the potential for sexual exploitation and abuse and in line with the IASC Core Principles on PSEA, ActionAid has banned this activity. ActionAid strictly prohibits staff and other representatives from buying sex. ActionAid's SHEA and Safeguarding approach does not condemn nor discriminate against sex workers or make judgements on people who sell sex. However, noting that sex workers are at risk of harm and in order to prevent an abuse of power and sexual exploitation, ActionAid prohibits representatives from buying sex in any form.
5. Staff and other representatives from engaging in any kind of sexual activity with children (anyone under the age of 18 years, or older if the local law indicates this). Mistaken belief of age is no defence. Where applicable, ActionAid will also cooperate fully with local authorities to ensure the safety of children and others.

I,acknowledge that I have read and understood the ActionAid Australia Safeguarding and Prevention of Sexual Exploitation and Abuse Policy.

I agree to comply with the Policy. I understand that a breach of the ActionAid Australia Safeguarding and Prevention of Sexual Exploitation and Abuse Policy are grounds for

disciplinary action, may lead to dismissal from employment or service, and may result in legal proceedings.

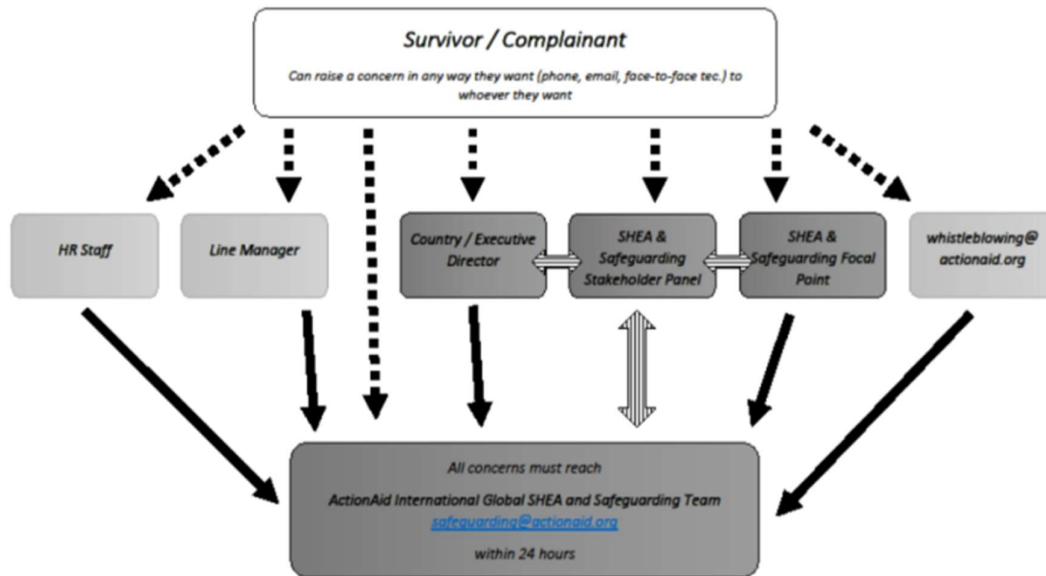
.....
Name Organisation
.....
Signed Date

This undertaking is to be signed by:

1. All ActionAid Australia representatives.
2. All ActionAid Australia partner organisations that are implementing aid activities.
3. All contractors and suppliers working with ActionAid Australia.

Annexure B

Reporting Flowchart



CHANGES TO POLICY

Nature of Changes	Date of Board approval
Policy first developed and approved by Board	21 September 2017
Updates to Policy: addition of undertaking to be signed by all AAA representatives, requirement for SEA risk assessment for all projects, responsibility for each AAA representative, including attendance at annual session to promote awareness, with training log updated to note attendees.	5 December 2020
Updated to align with changes to AAI PSEA Policy and the survivor centred approach	25 November 2023 (TBC)