

DOCUMENT			PAGE
Safeguarding Guidelines			1 (12)
DRAWN UP BY	DATE	DOCUMENT REFERENCE	VERSION
Unit for Quality and Strategy Support	2026-05-12	Guideline	2.0

Safeguarding Guidelines

1. Purpose

Act Church of Sweden (Act CoS) operates in development cooperation, advocacy and humanitarian aid. As a faith-based organisation, Act CoS cooperates with churches, faith-based and other civil society actors locally and globally to speak and act for human dignity. As an established organisation in development cooperation, advocacy and humanitarian aid, Act CoS is committed to advancing the realisation of human rights for all persons.¹

The purpose of this document is to explicate Act Church of Sweden’s commitment to safeguarding and to outline the policies, procedures and practices employed to ensure the safety of all staff and rights holders affected by the organisation’s activities. The guidelines are aligned with the *ACT Alliance Safeguarding Policy Framework (2024)*, *Act Church of Sweden’s Code of Conduct (2025)*, *Code of Conduct – the National Level of the Church of Sweden (2016)* and apply to all Act CoS staff as defined in *Act Church of Sweden’s Code of Conduct*.²

This document replaces the previous *Child Safeguarding Guideline (2018)*.

2. Commitments

The realisation of all people’s right to inclusive participation and safety is one of Act Church of Sweden’s eight strategic objectives.³ Act CoS uses the ACT Alliance definition of **safeguarding** as outlined in the *ACT Alliance Safeguarding Policy Framework*, section 2:

“an ethical approach and set of practical measures adopted by organizations to promote the safety and wellbeing of everyone involved in the delivery and receipt of humanitarian action and development assistance, whether that is aid delivered as a response to conflict or emergencies, or programmes and activities that are focused on building the capacity of communities e.g. for health or education”

¹ Strategic Plan for Act Church of Sweden, 2022, section 1.2.4.

² “The Code of Conduct applies when one represents Act Church of Sweden, and it applies to those employed at the national level, as well as trustees elected to the Church Board. It also applies to persons appointed to different missions under the Church Board (holders of duties of trust) and other persons that are included in groups/delegations that have been appointed by the Church Board or on delegation from the Church Board. The Code of Conduct also applies to other persons who have signed it.” *Act Church of Sweden’s Code of Conduct*, 2025, p. 1.

³ Strategic Plan for Act Church of Sweden, 2022, section 2.3.1.

Furthermore, safeguarding is about:

“protecting people, as far as possible from all forms of harm, including sexual exploitation and abuse and sexual harassment, that might result from their involvement in or contact with the organization.”⁴

As a faith-based actor, Act Church of Sweden recognises the role of faith communities may have in mitigating but also contributing to safeguarding risks.⁵ The likelihood of exploitation or abuse increases when individuals are in vulnerable situations and where unequal power dynamics exist.⁶

In accordance with the ACT Alliance commitments to safeguarding, **Act Church of Sweden commits to safeguarding staff, communities and all rights holders affected by the organisation’s activities from harm and inappropriate behaviour, including discrimination, bullying, harassment in any form, and preventing and responding to harm caused by the organization to the people being served, including sexual exploitation, abuse and harassment (SEAH).**⁷

Act Church of Sweden respects and abides by national and international law. At times, Act Church of Sweden’s Code(s) of Conduct and policies may be stricter than local or national legislation. In these cases, staff are obliged to adhere to Act Church of Sweden’s Code(s) of Conduct and policies.

Act Church of Sweden commits to the principles of these Safeguarding Guidelines in all levels of decision-making and activities.⁸

2.1 Child Safeguarding

Act Church of Sweden works together with international and local partners, such as churches, faith-based and other civil society actors. Programmatic activities often take place under difficult circumstances where children might be displaced, separated from their family or orphaned and removed from their usual social environment. Children who are physically or mentally injured or have a disability are particularly vulnerable. In many contexts, gender contributes to a child’s vulnerability.

In addition to the general responsibility to support safeguarding for all persons, **Act Church of Sweden recognises its specific duty of care to children who are affected by the organisation’s work.**⁹

⁴ ACT Alliance Safeguarding Policy Framework, 2024, section 2.

⁵ Position paper on Sexual and Reproductive Health and Rights (SRHR), 2022, section 2.

⁶ ACT Alliance Safeguarding Policy Framework, 2024, section 2.

⁷ Ibid.

⁸ Strategic Plan for Act Church of Sweden, 2022, section 1.2.4; Act Church of Sweden Guidelines for Quality and Accountability, 2026, section 3.7.; Act Church of Sweden’s Code of Conduct, 2025.

⁹ Act Church of Sweden’s Code of Conduct, 2025, pp. 3-4; Code of Conduct – the National Level of the Church of Sweden, 2016, section 3.

3. Guiding Principles

In line with the *ACT Alliance Safeguarding Policy Framework (2024)*, Act Church of Sweden applies the following safeguarding principles in the organisation's work:

- I. **Zero tolerance of exploitation and abuse, including sexual exploitation and abuse.** Act Church of Sweden does not tolerate any form of exploitation or abuse, including sexual exploitation and sexual abuse. Prohibited behaviour, online and offline, includes inappropriate language or behaviour, bullying and harassing a person verbally or physically, physical punishment, grooming and trafficking, visiting bars, restaurants, websites or other premises where minors or adults are exposed sexually and contravening the principle of duty of care. Staff must never have sexual relations, which can be perceived as sexually exploiting, with members of crisis-affected population groups, with regard to their increased vulnerability and what they are exposed to.¹⁰

Staff must never engage in any sexual activity with a child or children regardless of the age of majority or age of consent locally. Staff must never consume, purchase, sell, possess or distribute any form of child sexual abuse/exploitation material (CSAM/CSEM) or expose a child to pornography.¹¹ Act Church of Sweden will not knowingly engage, directly or indirectly, with anyone who poses an unacceptable risk to children.

- II. **Do No Harm.** As part of Act Church of Sweden's commitments for Quality and Accountability¹², risk assessment and follow-up to mitigate or avoid potential negative impacts of activities are mandatory parts of the organisation's routines. This includes cultural sensitivity, anti-racism, inclusion and decoloniality as fundamental principles when engaging with rights holders and communities.¹³ However, cultural sensitivity can never be a reason for not reporting, investigating or acting on safeguarding concerns.

- III. **Quality & Accountability.** Act Church of Sweden has a responsibility to the rights holders affected by our work to be accountable for the organisation's activities and always strive to ensure that the work can be held to high quality standards. Key elements for ensuring safeguarding include rights holders and local actors having access to information - including in age-appropriate, inclusive and local language(s) - knowing their rights, and having the power and resources to make decisions and participate in the work that affects their lives.¹⁴

Act Church of Sweden's commitments to Quality and Accountability include ensuring that measures to safeguard and protect rights holders from sexual exploitation, abuse, and harassment (SEAH) are included in program and project assessments and follow-ups¹⁵,

¹⁰ Act Church of Sweden's Code of Conduct, 2025.

¹¹ Ibid.

¹² Strategic Plan for Act Church of Sweden, 2022, section 3.

¹³ See *Process plan for AID&D 2025-2026*, January 2025.

¹⁴ Ibid.

¹⁵ Act Church of Sweden Guidelines for Quality and Accountability, 2026, section 3.7.

and that staff have the capacity to proactively work to mitigate safeguarding and SEAH risks in their work.

- IV. Intersectionality, gender and power.** Act Church of Sweden recognizes the interlinkages between gender, power, and factors such as identity or socioeconomic status, and their impact on vulnerability and safeguarding needs. Any form of marginalisation or discrimination on the basis of sex, age, ethnicity, race, sexuality, sexual orientation, gender identity, migration status, disability, economic status, and cultural, religious or political affiliation can increase an individual's vulnerability.¹⁶ Safeguarding measures must take into consideration the circumstances that put individuals or groups in vulnerable situations and be informed and addressed together with implementing partners in direct contact with affected communities and the rights holders living in vulnerability. This includes applying a decolonial lens in analysing local power dynamics and structures that drive or exacerbate inequality.¹⁷
- V. Confidentiality, reporting and complaints handling.** Act Church of Sweden commits to having a functioning, accessible, safe and timely Complaints- and Response Mechanism (CRM) in place, applicable to all signatories of the Act CoS Code of Conduct (CoC). The CRM includes a duty to report for all CoC signatories on any concerns of harm or abuse by Act CoS or partner staff.¹⁸ The CRM include clear measures on confidentiality and protection from retaliation of the complainant.¹⁹ Act Church of Sweden commits to always putting the wellbeing, dignity and rights of individuals affected by harm and abuse first and having a reporting procedure in place that aims to avoid potential re-victimization of affected individuals.

Act Church of Sweden is committed to working closely with implementing partners to ensure that partners' CRMs are of high quality and accessible to all rights holders affected by project or programme activities.²⁰

All implementing partner organisations supported by Act Church of Sweden are required to have a Code of Conduct and CRM in place. These requirements are regulated through Act Church of Sweden's Cooperation Agreements and Funding Agreements with partners.²¹

¹⁶ Position paper on Sexual and Reproductive Health and Rights (SRHR), 2022, section 2.

¹⁷ See *Process plan for AID&D 2025-2026*, January 2025.

¹⁸ Handbook for handling complaints, Act Church of Sweden, 2025, section 2.2.

¹⁹ Handbook for handling complaints, Act Church of Sweden, 2025, section 4.5.

²⁰ Act Church of Sweden Guidelines for Quality and Accountability, 2026, section 3.7.

²¹ See *Appendix 1 to the Cooperation Agreement and Funding Agreement*, 2023, paragraphs 14.1 and 14.14.

3.1 Guiding Principles specifically related to Child Safeguarding

In addition to the above safeguarding principles - which apply to all staff and rights holders affected by Act Church of Sweden's activities, including children - Act Church of Sweden recognises a specific duty to safeguard children who the organisation work with, are in contact with, or who are affected by the organisation's operations.²² As such, Act Church of Sweden applies the following principles specifically related to child safeguarding in the organisation's work:

- VI. Recognition of the best interest of the child.** Act Church of Sweden adheres to the *United Nations Convention on the Rights of the Child* (1989) and is committed to upholding the rights and obligations under this convention.

Act Church of Sweden respects children's right to participate in decisions affecting them and have their views heard and acted upon. Children should also have access to making complaints. Whenever there are conflicting interests, Act Church of Sweden will ensure that the best interest of the child always comes first.²³

- VII. Adherence to all child protection laws.** Act Church of Sweden's staff will adhere to local and international child protection legislation in countries where they travel and work. In cases where local legislation or cultural practices are less strict and in conflict with these Safeguarding Guidelines and/or Code(s) of Conduct, staff are obliged to adhere to Act Church of Sweden's Code(s) of Conduct and guidelines.

4. Implementation

Act Church of Sweden implements these Safeguarding Guidelines through the following processes:

I. Recruitment of staff

Act Church of Sweden's commitment to child-safe recruitment is defined in *Rutin för utdrag ur belastningsregistret i samband med rekrytering* (2018).²⁴ According to Swedish law, the employer is entitled to be informed of existing convictions for sexual offences against children entered in the criminal records if the applied position involves direct and frequent contact with children. For recruitments in Sweden, the applicant is obliged to provide this information. Whether a position does involve direct and frequent contact with children will be decided by the recruiting manager.

Recruitment procedures for Act Church of Sweden regional offices outside of Sweden are determined by global and country-specific HR manuals and guidelines.²⁵ These shall follow the procedures for safe recruitment in Sweden to the extent possible, while adhering to national legislation and avoiding putting applicants at unnecessary risk.

²² Act Church of Sweden's Code of Conduct, 2025, pp. 3-4; Code of Conduct – the National Level of the Church of Sweden, 2016, section 3.

²³ Church of Sweden has since 2013 committed to child impact analysis in all decision-making. See *Barnkonsekvensanalyser i Svenska Kyrkan*, 2012.

²⁴ Church of Sweden, *Rutin för utdrag ur belastningsregistret i samband med rekrytering*, 2018.

²⁵ See *Non-regulatory guidelines regarding global HR conditions and regulations*, Act Church of Sweden, 2024.

All recruitment processes include the requirement of the applicant to abide with the Church of Sweden's values of all persons' equal worth, working for peace, reconciliation, justice, and sustainability.²⁶

II. Code of Conduct

All staff must sign and comply with *Act Church of Sweden's Code of Conduct (2025)* and the *Code of Conduct – the National Level of the Church of Sweden (2016)*. Non-compliance with the *Code(s) of Conduct* will result in disciplinary action. The Church of Sweden human resources department keep the signed Code of Conduct(s) copies in the individual staff member's personal file.

III. Safeguarding induction and training

Act Church of Sweden staff receive training in safeguarding both as part of orientation for new staff and through recurring trainings for all staff. Online e-learnings on safeguarding are accessible to members of the ACT Alliance and its partners, primarily through the FABO learning platform.²⁷

In 2025, Act Church of Sweden launched a comprehensive process plan and training programme in *Anti-racism, Inclusion, Diversity & Decoloniality (AID&D)*²⁸ for all staff – including management. The programme includes awareness on (un)conscious biases and their impact on creating a safer and more inclusive organisation.

IV. Safe programming and risk assessments

Safeguarding communities and rights holders involved and/or affected by Act Church of Sweden's activities from harm is a priority for all of the organisation's programming and partner collaboration. Through the organisational PMERL (Planning, Monitoring, Evaluation, Reporting and Learning) system and follow-up of the organisation's commitments for Quality and Accountability²⁹, Act Church of Sweden commits to regularly reviewing programmes and projects to assess safeguarding risks and develop appropriate mitigation strategies as necessary.

V. Partner collaboration

Act Church of Sweden staff working directly with partner organisations will ensure that the latter have a Code of Conduct for staff in place to prevent corruption, fraud, exploitation and abuse and to safeguard children - as defined in the Act Church of Sweden Cooperation Agreement with partner organisations.³⁰

Act Church of Sweden also expects its partners to mainstream safeguarding in existing projects and programmes and conduct periodic reviews of their activities - with specific attention to new or emerging risks related to children, sexual exploitation, abuse and harassment (SEAH), and other forms of corruption. Act Church of Sweden commits to working collaboratively with partners to continuously

²⁶ §34:7 Kyrkoordningen; Code of Conduct – the National Level of the Church of Sweden, 2016.

²⁷ See <https://fabo.org/>.

²⁸ Process plan for AID&D 2025-2026, January 2025.

²⁹ Strategic Plan for Act Church of Sweden, 2022, section 3.

³⁰ See *Appendix 1 to the Cooperation Agreement and Funding Agreement*, 2023, paragraph 14.1.

improve safe programming and ensuring the upholding of human rights for all, based on mutual respect, learning and capacity-sharing. Part of this work is working together on best practices through the ACT Alliance Community of Practice (CoP) on Safeguarding and the Quality and Accountability Reference Group.³¹

VI. Procedures for reporting and investigating safeguarding concerns

Failure to observe the principles outlined in this guideline is a breach of *Act Church of Sweden's Code of Conduct* (2025). Such breaches are considered *sensitive complaints*.³² Investigations are conducted in accordance with the Core Humanitarian Standard (CHS) Alliance's *Guidelines for Investigations* (2015).³³

VII. Safe communication

Principles of safe communication are outlined in *Act Church of Sweden's Code of Conduct* (2025), the *Guidelines for information sharing* (2018), *Playbook sociala medier* (2023), *Guidelines – Act Church of Sweden photos* (2019), *Riktlinjer för kommunikation* (2021), and *Riktlinjer för policydialog* (2020).³⁴

The principles for safe communication include the mandatory use of templates for informed consent when sharing photographs, video, or text involving pictures and/or stories of rights holders – while always striving to portray rights holder respectfully and truthfully.³⁵ Risk assessments should always be carried out prior to advocacy actions, to avoid putting rights holders, partner organisations, or staff at risk, following the principle of Do No Harm.³⁶

VIII Monitoring compliance

This guideline has been approved by the International Director 2026-05-18. Act Church of Sweden management is responsible for ensuring that the guideline is reviewed every three years and revised as needed. Monitoring of risks, risk mitigation and appropriateness of safeguarding measures will be reviewed as part of Act Church of Sweden's internal auditing processes, annual CRM report, and follow-up of the organisational commitments to Quality and Accountability.³⁷

³¹ See <https://actalliance.org/actstructures/>.

³² See *Handbook for handling complaints*, Act Church of Sweden, 2025, section 6.3.

³³ Handbook for handling complaints, Act Church of Sweden, 2025, section 6.4; <https://www.chsalliance.org/get-support/resource/guidelines-for-investigations/>.

³⁴ See e.g. *Riktlinjer för kommunikation*, 2021, p. 10. The documents listed in this paragraph are under revision and translation during 2026-2027. Once completed, this paragraph of the guidelines will be revisited and updated accordingly.

³⁵ Act Church of Sweden's Code of Conduct, 2025, p. 3.

³⁶ *Riktlinjer för policydialog*, 2020, section 8.3.

³⁷ Strategic Plan for Act Church of Sweden, 2022, section 3.

5. Definitions and terms

Abuse

When someone misuses their power or control over another person, causing harm or distress. This could happen because of gross negligence or sexual, physical and/or emotional abuse, and is often a combination of the above.³⁸

Bullying

Repeated behaviour which is intended to hurt someone emotionally or physically. Bullying is often aimed at certain people because of their race, religion, gender or sexual orientation or aspects such as appearance or disability.³⁹

Child

A person below the age of 18 years.⁴⁰

Child-Safe (Environment)

A child-safe environment is one where active steps are taken to reduce risks of harm against children, and there are clear, established guidelines and procedures for conduct, reporting abuse and follow-up.⁴¹

Child Sexual Abuse/Exploitation Material (CSAM/CSEM)

Material that depicts and/or that documents acts that are sexually abusive and/or exploitative to a child.⁴²

Complaint

Information provided by a person, indicating conduct that may be in breach of the organization's Code of Conduct.⁴³

Corruption

The misuse of trust, power or position for undue personal gain.⁴⁴

Decoloniality

"A mindset and/or praxis [...] [with] a commitment to root out that which remains in culture, education, society, and so on from the colonial era."⁴⁵ It is a "process of liberation to unmask and

³⁸ ACT Alliance Safeguarding Policy Framework, 2024, Annex I – Glossary.

³⁹ Ibid.

⁴⁰ United Nations Convention on the Rights of the Child, 1989; Act Church of Sweden's Code of Conduct, 2024, p. 10.

⁴¹ ACT Alliance Safeguarding Policy Framework, 2024, Annex I – Glossary.

⁴² Interagency Working Group on Sexual Exploitation of Children, *Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse*, 2016, section F.4.

⁴³ Ibid.

⁴⁴ Act Church of Sweden's Code of Conduct, 2025, p. 6.

⁴⁵ Christian Aid, *Position Paper - Decolonisation and decoloniality*, June 2023, p. 7.

reveal coloniality, and challenge its endurance across three dimensions: power, knowledge and being.⁴⁶

Discrimination

The exclusion of, attitude or action towards, an individual based on their social status, ethnic background, skin colour, religion, or religion or other belief, sex, sexual identity or expression, sexual orientation, age, civil status, nationality, political belonging or special needs.⁴⁷

Do No Harm

The guiding humanitarian principle that requires actions and decisions to be taken to avoid causing further damage and harm.⁴⁸

Duty of Care

A common law concept that refers to the responsibility of the organization and individual to provide staff, community members and children, with an adequate level of protection against harm. It is the duty of the organization and its staff to protect rights holders affected by their activities from all reasonably foreseeable risk of - or real - injury.⁴⁹

Exploitation

Any actual or attempted exploitation of someone's vulnerability, dependent position, or trust by threatening negative consequences.⁵⁰

Grooming (including online)

An action of attempting to form a relationship with a child or young person, with the intention of sexually assaulting them or inducing them to commit an illegal act.⁵¹

Harassment

Undesired verbal or non-verbal behaviour that violates a person's dignity. It can also include subjecting someone to offensive treatment based on characteristics such as ethnicity, disability, gender, gender identity or expression, religion or beliefs, sexual orientation or age.⁵²

Informed consent

Consent given by a person, sometimes written, to participate in an activity. Consent is always based on clear and detailed information about what the participation entails.⁵³

⁴⁶ Ibid.

⁴⁷ Act Church of Sweden's Code of Conduct, 2025, p. 6.

⁴⁸ Anderson, Mary B. (1999) Do No Harm: How Aid Can Support Peace—or War.

⁴⁹ ACT Alliance Safeguarding Policy Framework, 2024, Annex I – Glossary.

⁵⁰ Act Church of Sweden's Code of Conduct, 2025, p. 6.

⁵¹ Ibid.

⁵² Ibid.

⁵³ Ibid.

Partner

An organisation that is in an established partnership with Act Church of Sweden and/or benefits from funding provided by Act Church of Sweden.

Rights holder

Rights holder is a concept that assumes that all people have the right to have their voice heard and considered.⁵⁴ The participation of rights holders rests on a theoretical framework in the *United Nations Universal Declaration of Human Rights (1948)* and the *United Nations Convention on the Rights of the Child (1989)*.

Safeguarding

The responsibility of organizations to make sure their staff, operations, and programmes do no harm to rights holders at risk nor expose them to abuse, exploitation, bullying or harassment.⁵⁵

Child Safeguarding

A specific set of internal facing policies, procedures and practice employed by an organisation to ensure that it is child safe. This includes:

- All staff behaving appropriately towards children and never abuse the position of trust that comes with their employment.
- All staff are aware of and respond appropriately to issues of child abuse and the sexual exploitation of children.
- The organisation creates a child-safe environment in all activities by always assessing and reducing potential risks to children.
- All staff recognise and prioritise a duty of care to children.⁵⁶

Sexual exploitation

Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes. This includes inappropriate touch by force or coercion.⁵⁷

Sexual harassment

A behaviour of a sexual nature that violate someone's dignity.⁵⁸

Staff

Refers to all permanent and temporary staff, their dependents, interns, consultants, observers, volunteers, elected representatives and all individuals working for or representing the organisation.

⁵⁴ Handbook for handling complaints, Act Church of Sweden, 2025, section 9.

⁵⁵ ACT Alliance Safeguarding Policy Framework, 2024, Annex I – Glossary.

⁵⁶ Ibid.

⁵⁷ Act Church of Sweden's Code of Conduct, 2025, p. 6.

⁵⁸ Ibid.

Trafficking

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threatening, force or other forms of coercion – such as abduction, fraud, deception, abuse of power or a position of vulnerability, or giving or receiving payments or benefits to achieve control over another person - for the purpose of exploitation, including sexual exploitation or forced labour.⁵⁹

⁵⁹ United Nations General Assembly Resolution 55/25, 2000, *Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime*, Article 3.

6. Supporting documents

ACT Alliance

- ACT Alliance Safeguarding Policy Framework, 2024.

Act Church of Sweden

- Act Church of Sweden's Code of Conduct, 2025.
- Appendix 1 to the Cooperation Agreement and Funding Agreement, 2023.
- Act Church of Sweden Guidelines for Quality and Accountability, 2026.
- Guidelines – Act Church of Sweden photos, 2019.
- Guidelines for information sharing, 2018.
- Handbook for handling complaints, 2025.
- Non-regulatory guidelines regarding global HR conditions and regulations, 2024.
- Riktlinjer för kommunikation, 2021.
- Riktlinjer för policydialog, 2020.
- Playbook sociala medier, 2023.
- Position paper on Sexual and Reproductive Health and Rights (SRHR), 2022.
- Process plan for AID&D 2025-2026, January 2025.
- Strategic Plan for Act Church of Sweden, 2022.

Church of Sweden

- Barnkonsekvensanalyser i Svenska Kyrkan, 2012.
- Code of Conduct – the National Level of the Church of Sweden, 2016.
- Rutin för utdrag ur belastningsregistret i samband med rekrytering, 2018.

External resources

- Christian Aid, *Position Paper - Decolonisation and decoloniality*, June 2023.
- Interagency Working Group on Sexual Exploitation of Children, *Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse*, 2016.