BRAC

Safeguarding Policy

May 2019

Introduction

BRAC has for over forty years made the safety of the participants of its programmes as well as the safety of the employees of its programmes and enterprises of paramount importance in the way it has conducted its (anti-poverty) work.

While the concept of safety itself has broader implications, safeguarding will in the context of this policy (and in line with current use in the humanitarian and the development field) be conceived as protecting against abuse, that is, against sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

BRAC has safeguarded its people (participants, employees) in the first place by making their safety a primary consideration already at the level of the design of programmes and enterprises. The prevention of sexual harassment, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation is as far as possible built into the work practices themselves. Where the design and its implementation cannot reduce risks sufficiently, BRAC has established secondary safeguarding mechanisms, like the selection and training of personnel, supervising and monitoring activities, reporting channels, investigation and punishment.

In many cases, BRAC has sought to furthermore carry its safeguarding forward into the communities it serves. It has done so by example, through dialogue and by tailored programmes.

This forty-year effort in safeguarding has been sustained because the fight against sexual harassment, intimidation, violence, bullying and discrimination, neglect and exploitation is part of BRAC's mission. It is part of its mission in two ways. BRAC sees that fight as one of its primary tasks closely connected to its core values of respecting human dignity, integrity and inclusiveness. BRAC also knows that if it guards the safety of its people and the communities it serves, its anti-poverty work will be more effective.

BRAC has articulated that commitment to safeguarding at the level of its values, its code of conduct and its workplace instructions. It is a vital element in the induction of new employees. It is an important element of its human resource strategy.

The leadership of BRAC has during these forty years consistently reinforced the importance of safeguarding and has led by example. Its Boards have been vigilant, its management persistent.

BRAC has noted with great concern the recent integrity scandals in the humanitarian and development sector and the moral panic that has ensued. BRAC mourns the suffering of victims and survivors, abhors the sexual harassment and the violence. BRAC applauds the renewed vigor with which organizations within the sector have undertaken to safeguard the people they work with and serve. BRAC understands that governments and donors are seeking more assurances from organizations within the sector - including from BRAC itself.

In the light of this crisis in the humanitarian and development sector, BRAC has undertaken to write up its forty-year history of safeguarding practice in the form of a comprehensive safeguarding policy. In this policy, BRAC will bring together a handful of pledges that will guide its future efforts, safeguarding principles, standards of behaviour, safeguarding practices, governance; the relevant sub-policies concerning the safeguarding of specific groups in specific programmes and enterprises, and descriptions of all safeguarding practices it has developed in the last forty years, encompassing both design solutions and secondary mechanisms. BRAC acknowledges that it has in the past not done enough to document the way it safeguards; it will rectify that in this policy, in its underlying documentation and in future studies and publications.

Pledges

1. The BRAC organization and the BRAC leadership hereby pledge that the safeguarding of its people (employees, participants) and the people of the communities it serves against abuse, that is, against sexual harassment, bullying, discrimination, intimidation and violence, neglect and exploitation will continue to be a primary guiding principle in its anti-poverty work, its programmes and its enterprises.

2. The BRAC organization and the BRAC leadership pledge that the commitment to safeguarding will continue to be articulated at the level of its values, code of conduct and work instructions. They pledge that safeguarding will continue to be incorporated in the design of programmes and enterprises. They pledge that, where necessary, secondary safeguarding mechanisms will continue to be established and then maintained.

3. The BRAC organization and the BRAC leadership pledge that they will analyze, describe and document the safeguarding work they have done and do. Of particular importance are the descriptions of the ways safeguarding risks have successfully been avoided in the design of programmes and enterprises and the descriptions of secondary mechanisms that have successfully tackled specific remaining risks. BRAC will make this research available to its partners and donors, as well as to other organizations in the sector.

4. The BRAC organization and the BRAC leadership pledge that they will continue to look for gaps and weaknesses in their safeguarding practices and address them wherever and whenever they are found. BRAC envisions this as an ongoing effort. System audits have been, are and will be an important element of this constant improvement of safeguarding practices.

5. The BRAC organization and the BRAC leadership pledge that they will continue to research, innovate and test new safeguarding solutions. They recognize that, because of the scale, breadth and interconnectedness of its programmes and enterprises, BRAC occupies a unique position in the sector. It accepts the responsibility that goes with that position. BRAC aspires to help the sector to overcome its safeguarding deficiencies.

Scope

BRAC is committed to safeguarding. It wants to protect all its employees and participants against abuse, that is, against sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

BRAC also recognizes that some of its people are more at risk. It is with that in mind that BRAC recognizes six different categories within its people that are more at risk than others and therefore deserve extra efforts to protect them. These six categories are: children, adolescents, adults with special needs, women among the participants; adults with special needs and women among the employees. BRAC will not hesitate to add other general categories to this list in future if it concludes that this is warranted. BRAC will also at the level of specific programmes or activities offer extra protection to people outside these categories whenever that is needed. For now, these six categories will provide a structure for BRAC's efforts to:

- Analyze, describe and document the safeguarding work BRAC has done over the last forty years and is doing now
- Develop and implement sub-policies
- Design programmes and enterprises
- Establish secondary mechanisms
- Improve and innovate safeguarding practices

BRAC has been and will be safeguarding its people across all its programmes and enterprises: financial services (ultra-poor, microfinance,), health care (water and sanitation, pregnancy, birth, maternity, young children, rural health, tuberculosis and malaria control), education (pre-schools, play labs, primary schools, secondary schools, professional skills training, life skills training for adolescents), society (legal, gender, community, safe migration), humanitarian (Rohinga refugees), climate change (resilience), social enterprises (textiles, silk, artificial insemination, dairy, chicken, fisheries, cold storage, nurseries, packaging, paper, salt, seed, sanitary napkins.)

BRAC acknowledges that its safeguarding responsibilities do not end at the boundaries of its programmes and enterprises. It has sought and will continue to seek a dialogue with partners, suppliers and client organizations about safeguarding. It will include conditions regarding safeguarding in the contractual relations it enters into. It will react with severity if those conditions are not met or broken. BRAC will also continue to reach out into the communities it serves and the

societies where it works to fight sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

All of the above means that this safeguarding policy applies to all cases within BRAC where employees abuse other employees, where employees abuse participants, where participants abuse employees - and the cases where participants abuse participants within BRAC‘s span of control or sphere of influence.

Safeguarding Principles

BRAC holds the following principles with regard to safeguarding as self-evident and as foundational for its practices:

Organizations have a safeguarding duty of care to participants, staff and volunteers, including where down-stream partners are part of delivery. This duty of care extends to people at risk of abuse within the communities the organizations serve.

Organizations have a duty to identify groups of people among employees and participants that are at greater risk of becoming victims of abuse. They have a duty to try to mitigate the extra risks those groups face.

Organizations have a duty to try to prevent abuse occurring. They must make safeguarding a central element of the organizational culture. They must mitigate existing risks that may already exist in the programme design and specific work practices. They must establish secondary safeguarding mechanisms wherever risks cannot be mitigated through design.

Organizations have a duty to make sure that, if abuse does occur, victims and witnesses have access to multiple safe reporting channels. Organizations have a duty to always follow up on reports of abuse, to investigate them and to make sure that, if warranted, appropriate disciplinary action is taken. Organizations have a duty to protect whistleblowers.

Organizations have, in principle, a duty whenever abuse crosses the line into criminal behaviour to involve local authorities. However, the dangers in terms of lack of due process and disproportionate punishment should be taken into account.

Organizations have a duty to anchor safeguarding within management. Responsibilities with regard to safeguarding should extend to the highest levels of management and to the Boards. Those responsibilities should be clearly assigned. Organizations have a duty to make sure that the execution of safeguarding policies is carried out by competent professionals according to the highest standards and, whenever possible, following global best practices.

Everybody within an organization is responsible for safeguarding employees, participants and community members. Everybody should intervene to stop abuse whenever possible. Everybody should report abuse.

Standards of Behaviour

The following standards of behaviour are the minimum requirements for all employees and associate personnel (which can include volunteers) with regard to safeguarding and with regard to the prevention of abuse, that is, sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

Employees and associated personnel of BRAC must not:

- Violate the Code of Conduct of BRAC.
- Violate the Sexual Harassment Elimination (SHE) Policy
- Violate the Child and Adolescent Protection Policy
- Violate the Adults with Special Needs Policy

They must not:
- Physically assault anybody
- Threaten anybody with physical assault
- Hit children and adolescents to discipline or correct them
- Assault anybody with a weapon
- Threaten to assault anybody with a weapon.

They must not:

- Bully anybody
- Humiliate anybody
- Humiliate children or adolescents to discipline or correct them
- Discriminate against anybody, for example, based on religion, gender, sexual orientation, race, skin color, age, ethnicity, caste.

They must not:
- Interact sexually with anybody without the other's willing consent
- Sexually harass or assault anybody
- Have any sexual interaction with children
- Have any sexual interaction with adolescents who are participants
- Have any sexual interaction with adolescents under the age of consent
- Have any sexual interaction with adults with special needs who are participants of the programme they are working with
- Have any sexual interaction with women (or men) who are programme participants of the programme they are working with
- Have any sexual interaction with fellow employees of BRAC in exchange for money, goods or favors or based on any form of coercion.

They must not:
- Neglect children, adolescents and adults with special needs who are entrusted to their care
- Exploit children, adolescents, adults with special needs or other participants or fellow employees in any form
- Bring children, adolescents, adults with special needs or other participants or fellow employees into a situation where they can be abused or exploited by third parties.

Employees and associated personnel of BRAC must:
- Follow the Code of Conduct, the Sexual Harassment Elimination Policy, the Child and Adolescent Protection Policy, the Adults with Special Needs Policy
- Anticipate risks for fellow employees or participants of being abused, that is, being sexually harassed, intimidated or assaulted, bullied, humiliated or discriminated, neglected or exploited and take steps to mitigate those risks
- Avoid being placed with children or with adolescents who are participants or under age, or with adults with special needs who are participants, in a compromising position. The adult is always considered responsible even if the child or adolescent or adult with special needs has initiated sexual interaction
- Stop immediately any abuse they witness, if at all possible
- Report any abuse they witness or have reliable information about
- Treat everybody with respect
- Respect everybody's privacy.

Safeguarding Practices

BRAC works on safeguarding along three axes; ethos, prevention and repression. BRAC has been doing its safeguarding work within a framework of iterative learning: try, evaluate and improve.

Ethos

BRAC is a southern anti-poverty organization, based on respecting human dignity, integrity and inclusiveness. Those values infuse all the work BRAC and its employees do. It is at this level that the force and weight of those forty years of experience have the greatest impact. These values are not just words on paper. They are the stories people tell about how working for BRAC changed their

lives. They are the pride that all people working for BRAC feel. They are the exemplary lives and actions of specific individuals within BRAC and the admiration others express about those. They are the design principles followed by programmes and enterprises. They are the reasons for strategic decisions, for the existence of a programme or enterprise, the reasons for pushing barriers in, a society, a state, and the reasons to shift resources, to walk the extra mile, to take a personal or organizational risk. Children and women are at the center of all of this.

In understanding the “Bracness of BRAC” the first tenet one has to grasp is that this huge anti-poverty machine actually thinks of the children of people living in poverty as its main target. BRAC understands that lifting people out of poverty is a multigenerational project. Here, the values of BRAC and the values of its adult participants align beautifully and reinforce each other. Both BRAC and the adult participants invest and invest and invest again in the children, in the next generation, in the future. To say that BRAC and the communities it serves together safeguard children is an understatement; they treasure them.

The second tenet one has to understand is that BRAC, from the beginning, resolutely, without ever wavering has chosen the side of women and their emancipation. That resulted in dedicated gender programmes. That resulted in the priority given to the education of girls. That resulted in the absolute priority given to women and their economic agency in micro-finance. That resulted in a workforce where women are in the ascendancy; in numbers, in careers, in power. That resulted in the internalization of gender equality across men and women working for BRAC. That resulted in an exceptionally strong internal system to prevent and punish gender discrimination and sexual harassment. The empowerment of women is for BRAC not a secondary, additional aim; it is a guiding principle of all of its programmes and enterprises.

BRAC has articulated its vision, mission and values in a series of inspiring documents. These form the basis of a code of conduct that describes forbidden behaviour in depth and detail. Safeguarding is an important element in all these documents. BRAC uses these documents in the induction of all new employees. They are often present or referred to in other policy documents and in much of BRAC’s internal and external communication. Even more importantly, however, they are translated to the level of the workforce and work processes. For example, the safeguarding of children is articulated in a very precise way in the training manuals of teachers, or the safeguarding of women in the instructions around the loan payback process.

Going forward, BRAC will continue to update its vision, mission and value statements and its code of conduct regularly. It will continue to incorporate them in the induction and training of its employees and in manuals and work instructions. It will continue to make sure that safeguarding is one of the constitutional concerns of its ethos and that this is expressed at all levels. BRAC is looking into the possibility of further strengthening its ethos by the introduction of a moral learning process in its organizations. If that turns out to be feasible, BRAC will share the resulting mores prudence within the sector.

BRAC has always propagated and will continue to propagate as part of its values a culture of openness and accountability. It is especially important to continue to make clear to employees that loyalty to colleagues and loyalty to BRAC should never be interpreted as a reason for hiding violations. Being loyal within BRAC means always finding a way to talk about, to report what has happened.

Prevention

Safe Design

BRAC will continue to incorporate safeguarding into the design of programmes and enterprises and their work processes. BRAC sees this as the most important and effective way of protecting its people and the high-risk groups within them. This incorporation of safeguarding in the design is based on the deep (implicit and explicit) knowledge that BRAC possesses about the specific risks of abuse connected with particular activities. As stated above, BRAC will make an effort in 2019 to describe the way existing designs safeguard high-risk groups. Going forward, BRAC will explicitly highlight the safeguarding of high-risk groups within new designs wherever these are relevant.

Secondary safeguarding mechanisms

BRAC will continue to establish secondary safeguarding mechanisms to mitigate abuse risks for its people and the high-risk groups within them. Some of those mechanisms have a general character; they work across programmes and enterprises. Others are very specific; they work within a single programme or activity. The ethos work mentioned above is, of course, the first general line of defense against abuse. Other general mechanisms are the attention paid to safeguarding in the recruitment and selection process and in the induction and training of employees; the regular practice of risk analysis; line management responsibility and action; the deterrence achieved through the repression outlined below.

Recruitment and Selection

BRAC will continue to ensure it assesses the eligibility of candidates from a safeguarding perspective. BRAC has a Safe Recruitment guideline which defines the steps that should be taken throughout the hiring process, from designing the job description to formal engagement of the employee to minimize the risk of engaging someone who may pose an unacceptable risk to children, adolescents, adults with special needs and women. In summary, the following will be considered when planning recruitment:

- Job descriptions for all positions - make reference to responsibilities for safeguarding and/ or the Code of Conduct and include the beliefs and values of the organization or link to them.
- Advertisement - make clear the organization's commitment to safeguarding.
- Shortlisting - obtain and scrutinize information in applications/CVs - resolve any gaps, discrepancies or anomalies in employment history.
- Interviews - include questions around safeguarding, the Code of Conduct and working with children, adolescents, adults with special needs and women.
- Self-disclosure - the shortlisted candidates will sign a self-disclosure form stating that they have not been involved in any crime, illegal act, sexual harassment or child abuse case previously.
- Background/reference checks - verify the successful applicant's identity, their employment history, and qualifications. Offers should not be confirmed until all checks have been completed.
- External checks - conducted according to organizational policy and country requirements where required, police verification should be conducted.

Education/training

BRAC will continue to make safeguarding an important element of the education and training of its staff. It will do that both in the induction of all employees and in the training of professionals for specific functions.

- Every new hire will receive a brief introduction to the vision, mission and values of BRAC, the Code of Conduct and the Safeguarding policy and duly acknowledge all of these as part of their induction.
- BRAC HR is committed to ensuring that aspects of safeguarding that are relevant to specific work processes are always part of the professional training of all staff and that, where needed, this training will be regularly repeated.
- BRAC HR will continue to make sure that the professionals who handle the cases and complaints have competencies in line with the highest standards and the best practices.
- BRAC HR will regularly across the programmes and enterprises organize campaigns to create awareness about safeguarding. The campaigns will be precisely targeted and tailored to ensure that they are relevant to the staff and participants in question. They will have a very varied character.

Risk Analysis

BRAC will in future, if it knows risks of abuse (sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation) are present in a process and suspects that they are insufficiently mitigated, proactively undertake an in-depth analysis of process, risks and risk-enhancing factors. That analysis will be based on dossiers, observations and interviews. It will result in recommendations to redesign the work process and/or to add or change secondary safeguarding mechanisms. Such a risk analysis will already have a deterrent effect. The implementation of its

recommendations will lower risk and raise mitigation structurally. The risk analysis practice should be seen as the main element in the framework of iterative learning around safeguarding. From a long-term perspective the practice has a cyclical character.

Line management and prevention

Within BRAC, line managers have direct responsibility for preventing abuse. They have to make sure that safe designs are implemented and that secondary safeguarding mechanisms are maintained. They have to understand residual risks of abuse that are connected with processes and events and have to mitigate those, where necessary and possible. They have to make sure that employees are familiar with the ethos of BRAC and with the general and relevant specific safeguarding policies.

Line managers have a unique responsibility to stop abuse. They are the ones that are in the position and have the power to make sure that it ends. They therefore have the obligation to immediately intervene whenever they witness abuse or are alerted to it. Finally, line managers within BRAC are responsible for creating an atmosphere of openness and accountability within their teams that makes it possible for witnesses and victims to come forward.

It is a vital element of prevention that top management in a visible manner takes responsibility for safeguarding. That gives everybody in the organization the unequivocal message that all forms of abuse are unacceptable, that the organization takes the fight against them seriously, that perpetrators will be punished, and victims will be supported. BRAC's top management always has and will continue to embrace this responsibility.

Safe Partnering

BRAC aims to safeguard while working with children, adolescents, adults with special needs and women through partner organizations (suppliers, vendors, downstream partners, consultants, etc.).

• Wherever BRAC is working with, funding, or supporting other partner organizations to work directly with children, adolescents, adults with special needs or women, the provisions of this policy and guidance should be reflected in the partnership arrangements.
• Reaching an agreement along these lines with partners should be envisaged as a dialogue. It will be done through discussion and negotiation, if necessary, as a part of advocacy and capacity-building strategies.
• These partners should have their own safeguarding policy that broadly follows the provisions of this policy, or should adopt the BRAC policy.
•These partners should commit to implement the policy and to the safeguarding of children, adolescents, adults with special needs and women against abuse, that is, against sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.
•BRAC should be satisfied that the practice and management arrangements of its partners reflect this common commitment to safeguarding.
•If a case of abuse within a partner organization comes to its attention, BRAC will always act to make sure that the abuse is stopped and the case is followed up in an adequate manner.
•All partners should understand and be warned that BRAC will not accept that cases of suspected abuse are not adequately followed up. Such a lack of adequate follow-up could result in the end of the partnership.
•All partners should understand and be warned that BRAC will not accept that safeguarding policies are lacking or are inadequately implemented and high-risk groups are put at risk of abuse. Such a lack of policy or implementation could result in the end of the partnership.

Repression

A repressive apparatus consists of reporting channels, professional investigative units, and bodies that advise and decide about punishment. BRAC has created such an apparatus and will maintain it.

Reporting

BRAC has created a reporting system for abuse (and other violations) with several channels that complement each other. These channels are known throughout the programmes and enterprises. Regular campaigns ensure continued awareness.

The first channel is line management. Line managers within BRAC are aware that they have to intervene to stop abuse and that they have to report all cases upward through the line. Cases of suspected abuse reported up through the line are always followed up.

The second channel makes it possible to bypass management and reach the specialized investigative body directly. The channel operates both a dedicated 24/7 phone number and a dedicated email. Through this channel the identity of the complainant can be protected. Cases of violations reported through this channel are always followed up.

The third channel is a whistleblower channel.

All channels are used regularly. This shows that they are known, accessible and trusted.

BRAC has made sure in the past that people that have reported abuse and other violations have not suffered any negative repercussions. They have on the contrary been made aware of the gratitude of the organization. BRAC will continue to protect complainants and whistleblowers and make them feel appreciated.

BRAC has in cases where accusations proved to be false erred on the side of forgiveness. Only in cases where there was clear malice involved have people that made false accusations been punished.

BRAC is actively exploring ways to make the reporting channels even more accessible. Among other things, BRAC is contemplating creating the role of “person of trust” within programmes and enterprises. The main focus of its efforts is the accessibility of the system for participants.

Investigation

BRAC has created a dedicated investigative unit. This unit is responsible for investigating cases of abuse and all other violations.

The unit has successfully investigated many cases in the last decades. It is staffed with experienced professionals.

The unit conducts its investigations independently. The unit is committed to guaranteeing due process to all involved parties.

The unit has always followed up on reported cases. The unit has always documented the follow-up and the investigations.

BRAC has made sure that the unit’s investigative capacity in terms of both competency and the number of personnel has been adequate at all times. BRAC will continue to do so in future

Punishment

BRAC is aware that proportionate punishment is essential for effective safeguarding. Impunity will undermine the whole system. It contradicts the ethos and makes prevention a farce. Deterrence collapses. It makes witnesses vulnerable. It violates victims for a second time. Trust in the system drops. A disproportionately light sentence has almost the same negative effects. Equally, vindictive - that is, disproportionately severe - punishments undermine the system. The punished has been unjustly treated. Colleagues are angered and often act in solidarity with the unfairly punished. Witnesses, sometimes even victims, feel guilty. The willingness of witnesses and victims to report abuse goes down, sometimes dramatically.

Because it knows how important proportionate punishment is, BRAC has invested deeply in the independence and the competence of the bodies and professionals that advise and decide about punishment. The dedicated body that decides about the punishment in cases of sexual harassment is completely independent and has outside members. The HR professionals that advise about the punishment in cases of other violations are highly competent and will not tolerate any interference.

As a final mechanism, BRAC has created the Ombudsperson as a completely independent institution. Every employee that has been punished because of a violation can appeal to the Ombudsperson to review BRAC's decision in his/her case. The Ombudsperson will review the whole process, including the quality of the investigation and the proportionality of the punishment.

Learning

BRAC prides itself on being a learning organization. The anti- poverty machine that is BRAC has come into existence through a rigorous process of iterative learning. Safe designs and the secondary safeguarding mechanisms that are already in place in programmes and enterprises are also products of a similar process.

BRAC has pledged in this document to intensify the learning around safeguarding. It will do so in the following manner. It will analyze, describe and document the existing safe designs and the process-specific secondary safeguarding mechanisms. It will regularly do system audits of the specific and the general secondary safeguarding mechanisms. It will, in future, build a capacity for risk analysis as described above and use that to start up a regular cycle of improvement.

Most importantly, BRAC will in a deliberate and targeted manner launch a series of experiments to try and solve some of the most intractable problems around safeguarding in the development and humanitarian sector. The list of experiments has still to be drawn up and finalized, but some strong candidates are: the accessibility of reporting channels for participants ; the re-articulation of masculinity in alignment with the fight against sexual harassment; supporting women and children in extreme circumstances to overcome sexual and violent traumas; adapting instruments like system audits and risk analysis to interpersonal violations; and creating space for other sexual orientations within the culture of NGOs.

Victims/Survivors

Prevention is the best way to help victims\survivors by preventing them from becoming victims. That is why BRAC will continue to invest in programme (and enterprise) designs that eliminate risks of abuse. That is why BRAC will continue to invest in secondary mechanisms that further diminish risks of abuse. BRAC acknowledges, however, that it will not be possible to completely banish all abuse. Because of this sad reality, BRAC has created and will continue to maintain the repressive apparatus around abuse that has been described above. Beyond and above that, BRAC is committed to helping victims/survivors in the best way it can. BRAC is, in other words, committed to the idea of restorative justice. By punishing the perpetrator in an act of retribution BRAC reinstates the victim/survivor as a citizen and fellow human being that never should have been abused. BRAC will also offer help to the victim/survivor to mitigate the physical and emotional damage that the abuse has caused. Finally, BRAC will in future facilitate mediation between victim/survivor and perpetrator, if and only if the victim/survivor expresses the will and wish to engage in such an interaction.

Governance

BRAC has created reporting channels and dedicated units for the investigation of suspected cases of abuse and for advising about punishment, as outlined above. The independence of the investigations and of the advice has been guaranteed. BRAC has integrated safeguarding into project and enterprise design. It has successfully created an ethos that has the safety of children, adolescents and adults with special needs and the empowerment of women at its heart. It has paid special attention to safeguarding in the recruitment, selection, induction and training of its employees. All these efforts are led from the top. The Executive Directors of BRAC International and BRAC Bangladesh are the joint safeguarding strategic leads for the safeguarding of employees and participants.

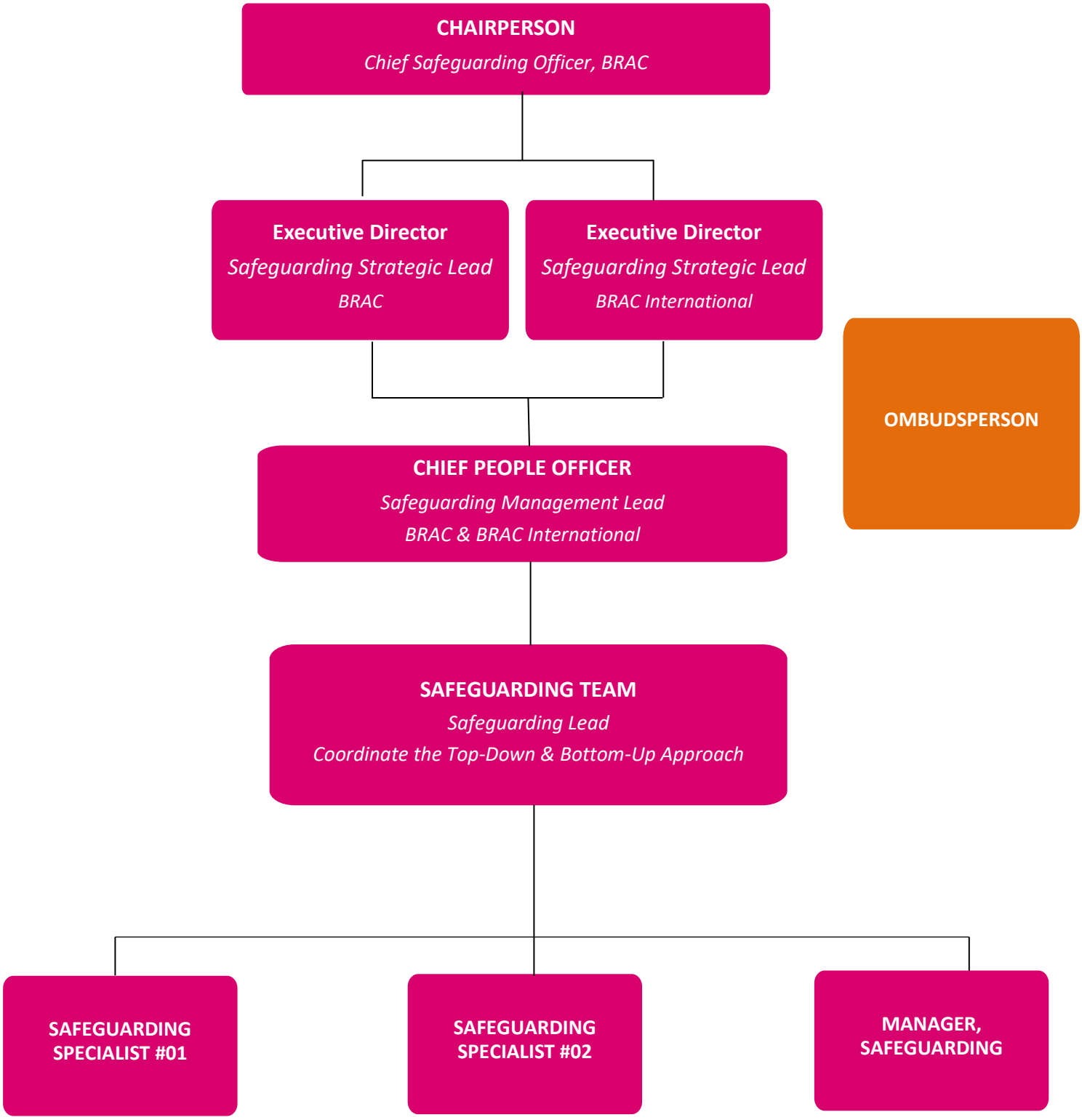
The Safeguarding Management Lead, as head of the extensive Safeguarding Working Committee, reports to them. The Boards of BRAC Bangladesh and BRAC International play a supervisory role. Issues relating to safeguarding and integrity are dis- cussed regularly at Board meetings. Most importantly, Chief Safeguarding Officer, Sir Fazle Hasan Abed, has taken the ultimate responsibility for overseeing the safeguarding efforts of BRAC. In so doing, he has made explicit and formal what has been a reality for forty years. Sir Fazle Hasan Abed has made the safeguarding of employees and participants against abuse a foundational aim of BRAC from its beginning.

Review of Safeguarding Policy and Procedure

The policy will be reviewed by BRAC Bangladesh and BRAC International Board annually or when it is shown necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.

ANNEX 1: Safeguarding Organogram

SAFEGUARDING ORGANOGRAM



ANNEX 2: Glossary

The objective of the glossary is to guide the reader with definitions specific to this policy document and/or BRAC.

Employees: This policy applies to all employees including regular, contractual, project, service, trainee (including apprentices & interns), volunteers, temporary staffs and non-graded staffs and programme participants of BRAC.

BRAC Staff are classified into various categories based on their work types:

1. Regular Staff: Staff who is employed against permanent positions requires serving a fixed probation period before confirmation.

2. Service Staff: Staff who contributes physical labor to perform their job, require no probation period, as confirmation is not applicable for this category.

3. Contractual Staff: Contractual staff work on the basis of Contract, there are two types of Contractual staff in BRAC.

a) Project Staff: Full time staffs who are hired for a specific project according to the duration of that project.
b) Fixed-Term: Staff who are hired for a specific period of time.

4. Temporary Staff: Temporary or Casual types of staff are hired for specific purpose.

Partner Organizations: Any organization with which BRAC enters into a partnership, to jointly design and implement a project

Downstream Partners: An implementing partner, which is a subcontract that helps to execute the program on the ground.

Associate Personnel: Other personnel affiliated with BRAC such as independent contractors.

Volunteer: Several BRAC programmes train and engage community workers to assist with dissemination, services and outreach. These independent contractors and through BRAC's

training obtain paraprofessional status where BRAC is investing in resources for their credentials which results in them being able to earn in return for their services. There are currently five such examples in BRAC:

1. **Community Empowerment Programme members of *Polli Shomaj*:** Using the strong grassroots network of more than 12,000 *polli shomaj* facilitated by CEP, this initiative aims to identify and report on the incidents of VAW, provide survivor support services, and mobilize grassroots communities to prevent violence. This initiative is being carried out in 55 districts with emphasis in nine districts with the highest number of reported incidents.
2. **Disaster Management programme's Emergency Responders.**
3. **Health programme's *Shastya Shebikas*:** One thirds of births take place at home, mostly assisted by unsupervised, untrained birth attendants. Recognizing these problems, BRAC have created a pool of frontline community health workers, the *shasthya shebikas* and *shasthya kormis*, who strive to address the crisis of human resources in the health sector by playing a substantial role in providing accessible and affordable services to the majority of the population.
4. **WASH programmes committee members**: In the Village WASH Committees (VWC) six out of eleven members are women. They have been helping to mobilize facilities and entitlements for communities in rural Bangladesh since 2006, especially for the poor and ultra-poor.
5. **BRAC Education Programme:** mothers volunteer on a rotational basis at the Early Childhood Development Centers.

Child: Children are defined as all those under 18 years of age in accordance with the UN Convention on the Rights of the Child. For the purposes of this policy and BRAC programmes ages 0 to 12 years of age are defined as children and ages 12 to 18 are defined as adolescents.

Participants:
BRAC programme clients. Recipients of various BRAC programmes and services

Enterprise: A Social enterprise lies at the intersection of business and traditional non-profit. Social enterprises are self-sustaining cause-driven business entities that create social impact by offering solutions to social challenges and reinvesting their surplus to sustain and generate greater impact.

Chief People Officer: Chief people officer (CPO) is a corporate officer who oversees all aspects of human resource management and industrial relations policies, practices and operations for an organization**.**

Safeguarding Working Committee: Chief People Officer of BRAC and BRAC International will chair the safeguarding working committee and will be the driver to implement the safeguarding measures. Executive Directors of BRAC and BRAC International will be the advisors of this committee. The committee will be formed for a two-year period till December, 2020. This committee can be reformed any time based on special requirement of management. The Committee will ensure proper planning and implementation of the safeguarding measures with focusing the safeguarding priorities.

Abuse: The term abuse as used in this policy encompasses: sexual harassment, intimidation, violence, bullying, humiliation, discrimination, neglect and exploitation. This and related polices seek to protect all BRAC employees (as defined above) and programme participants from abuse.

- **Sexual harassment** as defined in the Sexual Harassment Elimination Policy and Procedure (SHE policy) is: Any unwelcome direct, indirect, physical, verbal or nonverbal conduct of a sexual nature.
- **Intimidation:** intentional behaviour that would cause a reasonable person to fear injury or harm and do something they would not otherwise.
- **Violence:** Actual physical violence with or without a weapon.
- **Bullying:** As defined in the BRAC Prevention of Workplace Bullying and Violence Policy and Procedure is: Behaviour which seeks to belittle, dominate, target or single out someone. The behaviour can be indirect, aggressive and/or threatening. The use of electronic communication/social media which is referred to as "Cyber bullying" is also covered under this policy.
- **Humiliation:** to cause a person mortification or painful loss of pride, self-respect, or dignity.
- **Discrimination:** the unjust or prejudicial treatment of different categories of people, especially based on race, gender, marital status, religion, disability, sexual orientation and/or age. In this policy document the word is limited to individual discrimination or a group against an individual it does not address systemic discrimination.
- **Neglect:** is a form of abuse where the perpetrator, who is responsible for caring for someone, fails to do so. It can be a result of carelessness, indifference, or unwillingness.
- **Exploitation:** the act of mistreating or taking advantage of someone to gain benefit.

LIST OF BRAC PROGRAMMES, ENTERPRISES, INVESTMENTS and UNIVERSITY

Current BRAC programmes

1. Climate Change
2. Community Empowerment
3. Education
4. Gender Justice and Diversity
5. Health, Nutrition and Population
6. Human Rights and Legal Aid Services
7. Humanitarian
8. Integrated Development
9. Microfinance
10. Migration

11. Skills Development
12. Ultra-Poor Graduation
13. Urban Development
14. Water, Sanitation and Hygiene

Enterprises

1. Aarong
2. BRAC Dairy
3. BRAC Chicken
4. BRAC Seed and Agro
5. BRAC Artificial Insemination
6. BRAC Nursery
7. BRAC Sericulture
8. BRAC Fisheries
9. BRAC Recycled Handmade Paper
10. BRAC Cold Storage
11. BRAC Salt
12. BRAC Printing Pack
13. BRAC Sanitary Napkin and Delivery Kit
14. Bhumi Bondhu
15. BRAC Probashbandhu Ltd
16. BRAC Institute of Skills Development

Investments

1. BRAC Bank
2. Delta Brac Housing Finance Corporation Ltd
3. BRACNet Limited
4. Guardian Life Insurance
5. BRAC Tea Estates
6. IPDC Finance Ltd
7. BRAC IT Services
8. Maya APA

BRAC University

BRAC International

1. Agriculture & Livestock
2. Early Childhood Development (ECD)
3. Education
4. Emergency Response and Preparedness
5. Empowerment and Livelihoods for Adolescents (ELA)
6. Health
7. Microfinance