

Safeguarding Policy 2021

Focus: Protection from Sexual Exploitation and Abuse (PSEA)



N.C. 1.6.2021

1. Policy Statement:

DAM's founding aims envision holistic social and spiritual development for wellbeing of the human community and care for nature. DAM has been deepening its effort in utilizing organizational values as core ones to programming process for services and care. The organizational core values make DAM uniquely placed to play a universal role in addressing today's challenges related to human development, poverty, insecurity, exploitation, abuse and sustainable development. In fulfilling its founding aim and values, DAM upholds high standards of professional and personal conduct with rights, dignity and equality irrespective of race, cast, political and religious views.

DAM has a zero tolerance for sexual exploitation abuse and any financial misappropriation. DAM does not tolerate its members, staff, associates, partners, volunteers or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation, abuse or financial misappropriation. In situation when vulnerable people including adults, women and children are particularly at risk of sexual exploitation and abuse, DAM is committed to protecting the program participants and communities.

With its broad founding vision and values DAM has diverse range of activities, programmes and institutions, with strong linkages and synergy. Through this PSEA policy DAM affirms its commitment to spread the organizational values across all entities of the organization for protection of program participants and staffs from sexual exploitation and abuse. This policy ensures that all DAM staff, associates, and partners will be aware of their role and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. It also clarifies definitions and responsibilities regarding prohibitive behavior, professional boundaries, ethical considerations and the associated PSEA procedures, including the reporting and investigation processes.

Overall, DAM makes explicit commitments that the personal and professional conduct of anyone who carries out work for, or represents, DAM is, and is seen to be, of the highest standard.

2. Purpose of the Policy:

Purpose of the policy is to ensure safety and protection of all members, staffs, consultants, volunteers, partners and program participants involved with DAM so that they are not exposed to any threat or conduct of harassment, sexual exploitation and abuse. DAM is committed to responding promptly and appropriately to any PSEA violations. Moreover, through this policy DAM is committed to ensure human dignity, rights and protect values of the organization. Partners will also take responsibilities for ensuring PSEA measures are implemented.

3. Scope of the policy:

This Policy focus to educate and empower all involved with DAM, particularly the staff and programme participants to integrate PSEA principles into their daily work for systems and process development and remain accountable for ensuring safe programming and taking especial care over children, young people and vulnerable adults for their protection. This policy will set out the preventative measures to optimally minimize the risks, abusing power and causing specific harm including sexual exploitation or abuse to any program participant or member of the wider community, particularly vulnerable groups. The policy is largely guided by the UN conventions on the rights, national laws and DAM's other relevant policies

including Gender Policy, Anti-Harassment policy, Whistle-Blowing policy and Code of Conduct (CoC). DAM will ensure that partners are aware of the PSEA Policy and implement the necessary measures.

DAM will ensure PSEA policy implementation through a comprehensive code of conduct. The CoC will be a set of standards about behavior that the employees, consultants and volunteers of DAM are obliged to adhere.

DAM staffs, partners, caregivers, members, volunteers are strictly prohibited from engaging in any form of sexual exploitation, abuse of a position of power, or any other forms of abuse. Never engage in dual relationships and cross the professional boundaries with co-workers, program participants or stakeholders. Through this PSEA policy DAM will also take preventive measures, establish complaints procedures, investigation procedures and support to survivors and whistle-blowers.

The policy will also protect the staff and volunteers when they are vulnerable, at risk of harm or abuse.

4. Definition of PSEA:

Sexual exploitation is defined as an actual or attempted abuse of a position of power or trust, for sexual purpose. Exploitation can include profiting financially, socially, or politically from the sexual exploitation of another. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It also includes abuse virtual media and/or through any technology including mobile technology.

Area of exploitation and abuse include-

- Sexual assault and abuse (verbally, nonverbally, through touch) etc;
- Demanding sex in any context including abusing power;
- Making sex a condition for aid or implementation in a development project;
- Influencing someone to have sex (gift, emotional, employment etc);
- Forcing a person to engage in sex work or pornography or publish video, photograph without consents;
- Engage in duel relationships and cross the professional boundaries with co-workers.

5. Policy implementation:

This Policy reflects DAM's vision of visualizes a society that foster humanity, spirituality, humility, equality and caring the nature, both internally and in the community, that puts respect, diversity, inclusion, integrity, accountability, and human dignity at the core of our work. The key implementation modalities of PSEA:

- **Prevention:** Effective and comprehensive mechanisms to ensure awareness raising on PSEA amongst personnel; effective recruitment and performance management; Employees and program participants, beneficiaries will be made aware about PSEA, their rights and complaints procedures.
- Complaints procedures: Internal complaints and investigation procedures will be in place.
 Individuals are allowed to report concerns directly to the line management/supervisor or if necessary directly to the PSEA committee or human resource department through email,

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SMS, verbal or written communication. The respective person will be responsible to take necessary steps for in writing record/prepare documentation and with proper attention for next course of action. DAM will also ensure whistleblowers safeguards and confidentiality at all level.

- Investigation procedures: According to the HR policy and CoC DAM will take initiative to investigate complaints with ensuring quality, confidentiality, safety and transparency. Attached flowchart will guide the procedures. Responsible person will take necessary action within the first 24 hours by alerting the PSEA committee or respective HR Department.
- Support to survivors: Where there is an incident the first priority is to protect and support the survivor and whistleblower. Support to whistleblowers and survivors and enabling environment can help employees and beneficiaries feel empowered. Most survivors keep silent about sexual harassment and abuse due to "victim blaming," high stigma, cultural misunderstanding, familial backlash, psychical and psychological impacts of sexual trauma. DAM will provide support to overcome psychical and psychological distress through different support services.
- Capacity development: This policy is designed to develop staffs skills in delivering gender and culturally responsive program implementation and services for program participants/beneficiaries and vulnerable populations. In order to deliver this policy, DAM will strengthen its staff capacity through training/orientation, coaching or mentoring. All sectors and institutions of DAM will arrange capacity building training for the staffs with an outline and understanding that staffs should take into account to provide inclusive services aimed at population with diverse Sexual Orientation, as well as Gender Identity with a particular focus on the PSEA issues. It is important to carry out PSEA risk assessments for all projects and services. DAM's all sectors and institutions will take risk assessment strategy to identify and mitigate high risks of PSEA.
- Management and coordination: Concerned Management/Line Managers at all levels have particular responsibility to support and develop systems that maintain this environment. Effective policy development and implementation, cooperative arrangements, dedicated department/focal point committed to PSEA. The day-to-day management or supervision on a regular basis of any person carrying out the activities mentioned above.
- Enforcement: As per PSEA and HR policy of DAM sexual exploitation and abuse of employees and program participants are serious misconduct and are grounds for disciplinary action, including termination of employment and referral to law enforcement, if applicable. DAM will also comply with national laws and rules on PSEA violations. If any staff/volunteer/consultant/teacher who are proven to involve and committed sexual exploitation and abuse will be dismissed from their employment and ineligible for rehire;
- Advocacy: DAM will take initiative to conduct advocacy for mainstreaming PSEA issues
 within and outside organization. Moreover, main aims will be to build policy maker's
 knowledge on PSEA issues and important to achieve systemic changes and addressing the
 root causes of sexual exploitation, abuse and gender inequality.

6.1 Governance

To ensure implementation of PSEA policy DAM will form high level committee. The Chairperson of PSEA committee along with the committee members has ultimate responsibility for this policy and its proper management, using a systematic approach. As such, the Executive Committee (EC), Governing Body (GB), or the Board of Directors (BOD), etc. will receive a summary of any reported sexual exploitation and abuse incidents and follow-up quarterly basis.

6.2 Roles and Responsibilities:

6.2.1 PSEA Committee:

The PSEA Committee at the central office and as well as in each field location/ institutions will be responsible for informing and training all staff in safeguarding, PSEA and anti-harassment policies and procedures. They will also be responsible for prevent, monitor receiving and investigating any safeguarding complaints, including PSEA. The Committees will be trained in all of the DAM policies as well as reporting and investigations.

6.2.2 PSEA Focal Point:

While PSEA is a shared responsibility, with all parts of the organization and all levels of staff involved in ensuring a welcoming, inclusive, dignified and safe environment for those who come into contact with DAM. The PSEA focal will take initiative to execute the PSEA action plan and provide training to the staff and volunteers. He /she will support to prevent and respond to abuse and exploitation by receiving and forwarding concerns and for responding to any allegations, concerns or child and adult protection incidents. He/she will provide technical support for awareness raising, promote best practice, and provide advice to managers and staff. He/she will also take protective measures and safeguard for the whistle blowers and execute appropriate reporting mechanism.

6.2.3 Project Manager/ Coordinator:

The project manager/ coordinator will ensure the implementation of PSEA Policy within the community/group/team as applicable, build awareness of the community, sensitize the staff through training/ orientation. He/ she hold oversight of progress in PSEA work-plan with all concerned stakeholders/ partners/donors. He/she undertake thorough and systematized PSEA risk analysis for relevant activities and create an action plan to optimally minimize risks and establish the complaint response mechanism. He/ she hold overall accountability for implementation of this policy in his/her domain of management. Project Manager/ Coordinator also have a responsibility to support and develop systems that maintain an environment where all program participants involved with sensitization process - how to behave, how to raise complaints and concerns, and what action will be taken.

6.2.4 Staff/ teachers/ trainers/ volunteers, partners, consultants etc:

All Staff/ teachers/ trainers/ volunteers, partners, consultants are required to adhere to this policy at all times and are obliged to report any suspicions of sexual exploitation and abuse of others. He/she are required to sign the associated Code of Conduct and an acknowledgement of

having read and understood the policy. He/ she will act for awareness building and sensitizing the community people on PSEA.

7. Confidentiality:

DAM will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation. Confidential or sensitive information obtained by any staff during the course of an investigation shall not be disclosed to others unless required by law. Whistleblowers information will be also anonymous. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others. DAM will share information about allegations of sexual exploitation, abuse and harassment only with those who need to know about it. Records relating to sexual exploitation, abuse and harassment complaints will also be kept confidential on the same basis.

8. Whistle-blowing:

As referred to the DAM's whistle-blowing policy, all disclosures will be treated in confidence. DAM shall maintain an objective and secured reporting system to ensure that all program participants, staff, partners, and vendors have recourse in the event of possible abuse and misconduct. DAM will not allow any form of retaliation against persons who file a complaint or assist in the investigation procedure. DAM will ensure the safety and security of the whistleblowers.

9. Policy Review:

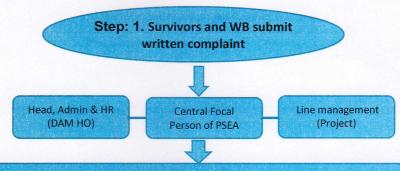
This policy shall be reviewed by DAM as required. Suggested policy changes must be approved by the Executive Committee of DAM

ANNEX 1: PSEA Reporting Process/flow of DAM

ANNEX 2: Incident Reporting & Documentation

ANNEX-3: Contact Details in respect any kind of PSEA issue:

ANNEX 1: PSEA Reporting Process/flow of DAM



Step: 2. The case/complaint refer to the PSEA Focal, who will then review the case and form a PSEA Action committee immediately not later than 3 working days

Step: 3. PSEA Committee will investigate and collect evidence (fact findings and observations) and prepare report for submission to the Central PSEA committee immediately not later than 7 working days

Step: 4. Central PSEA committee will review and to make the necessary decisions or actions immediately not later than 5 working days

Step: 5. The Head, Admin & HR will implement the decision/s accordingly as per "Discipline and General Conduct" of Service Rules of DAM immediately not later than 3 working days

Step: 6. If the staff member disagrees with the decision in Step 5, he/she may file a written request for appeal to the Chairperson of PSEA within 1 month of the penalty order. Chairman will review or make decision immediately not later than 5 working days

Step: 7. If the staff member disagrees with the decision in Step 6, he/she may file a written request for neutral arbitration to the President, DAM immediately not later than 15 days

Step: 8. The President, DAM will select an arbitrator. The arbitrator will determine the dispute and schedule hearings as appropriate.

Step: 9. After completing the hearings, the arbitrator will issue a written decision, immediately not later than 30 days of completing the hearing which shall be final, binding and conclusive upon the parties.

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ANNEX 2: Incident Reporting & Documentation

please continue on a separate sheet of paper if necessary.

This is an Initial cause for concern form which must be discussed with the PSEA Focal person within first 24 hours of the incident being reported.

1. DETAILS OF PERSON COMPLETING THE FORM			
Name			
Organization			
Name			
Tostron			
Address			
Postcode			
Contact number			
Contact number			
2. DETAILS OF PERSON CONCERN IS ABOUT Name			
Organization Name			
Position			
Address:			
Relationship to alleged victim			
3. DETAILS OF ALLEGED VICTIM			
Name			
Organization			
Date of Birth			
Age at time of incident(s)			
Address			
Postcode			
Contact number			
Any identified special needs of Victims			
Ethnicity			
4. DETAILS OF INCIDENT			
Date(s) or period (if over a drawn-out period) of incident			
Description of the incident/s. Please include as much details as possible. If a child/adult talked to you, write down the exact details of the conversation, remember not to lead the adult. Please			
include any other information including location, number of incidences, any witness details et			

Any actions taken?
Please indicate if you are in contact with any other bodies concerning this incident and include a contact name, address and telephone number. Child/ Adult / Police / Other
Any other additional information
Signed
Date
Name of Focal Point/ Officer/ Manager/ Coordinator
Signed
Date

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ANNEX-3: Contact Details in respect any kind of PSEA issue:

Name of	Dhaka Ahsania Mission (DAM)		
organization and	House 19, Road No 12, Dhanmondi, Dhaka 1209		
Contact Details	Phone: (880-2) 41020261		
Name and Contact	Chairperson:	Member Secretary/ Central	
Details of	Dr. S M Khalilur Rahman	Focal Person :	
Chairman and	General Secretary	Md. Jahangir Alam	
Focal Person of	Email: <u>mkhalilur@hotmail.com</u>	Joint Director	
Central PSHEA	mkhalilur@ahsaniamission.org.bd	CC & DRR and Rights &	
Committee	Cell: 01925-994262	Governance Sector	
		Email:	
		jalam.promit@gmail.com	
		Cell: 01710-231671	