Safeguarding Policy

Integrated Development Organization(IDO)

18 January-2022

Reviewer and Approval
This Safeguarding Policy has been reviewed and approved by the undersigned.

Position	**Signature**	**Date**
Chairperson, Governing Board, IDO		
Executive Director, IDO		
Director, Admin and Finance, IDO		

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Safeguarding Policy

1. Purpose

This Policy aims to set out approaches and procedures to safeguarding and promoting the welfare of children and vulnerable adults by the IDO. It applies to all aspects of IDO's works and to everyone working for it, including permanent and temporary employees, consultants, members of the Governing board, staff members of the partner organizations, beneficiaries, contractors and vendors.

2. Strategic Context

IDO is committed to provide an environment free from discrimination and harassment, where all individuals, partner organizations and other stakeholders are treated with respect and dignity and have equal opportunities at all level. IDO supports the principles contained in the Universal Declaration of Human Rights (UDHR) and the in the Constitution of Bangladesh. These clearly state that no one can be discriminated on the ground of class, gender, caste, religion, profession, ethnicity and sexual orientation.

Safeguarding does safe IDO's approach, practice and culture to a comprehensively safe environment for all people that the organization engages with. It has a comprehensive set of policies and procedures, i.e., Human Resources Management and Development, Procurement, Financial Management, Child Protection, Gender, Human Rights etc.

Although IDO does not have a separate Safeguarding Policy, however, some of the related issues are covered in the above-stated polices.

In January 2022, the donors for the IDO, the MJF has announced that there would be new and enhanced safeguarding standards for MJF's partners. The enhanced Due Diligence Assessment (DDA) has prescribed for safeguarding children and vulnerable adults from sexual exploitation and abuse. This will be covered in partner's policies and procedures on safeguarding, human resources, whistleblowing, risk management, code of conduct and governance.

Therefore, this Safeguarding Policy is adopted in line with IDO's commitment for providing and environment free from discrimination and harassment along with the recommendations of the donor.

3. Definitions

IDO has adopted following definitions for the purpose of this policy:

Issues	Definition
Bullying	Bullying is when an individual or a group of people with more power, repeatedly and intentionally cause hurt or harm to another person or group of people who feel helpless to respond. Bullying can continue over time, is often hidden from others, and will probably continue if no action is taken.[1] Bullying can occur in a variety of environments.
Child	Every human being below the age of 18 years.
Persons with disabilities	Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.[2] People with disabilities have rights equal to all citizens, including fundamental basic human rights that are mentioned in Persons with Disabilities' Rights and the Protection Act, 2013 and other related laws of Bangladesh.
Safeguarding	Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. This definition draws from IDO values and principles. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or

[1] National Centre against Bullying, 2018. *Definition of bullying*. [online] Available at: <https://www.ncab.org.au/bullying-advice/bullying-for-parents/definition-of-bullying/> [Accessed 21 November 2018]

[2] Article 1, UNCRPD and Optional Protocol

Issues	Definition
	vulnerability, especially for sexual purposes. Safeguarding applies consistently and without exception across IDO programmes, partners and staff thereof. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialize. Those systems must be survivor-centered and also protect those accused until proven guilty. Safeguarding puts beneficiaries and affected persons at the center of all.
Safeguarding children	• Protect children from maltreatment; • Prevent impairment of children's health or development; • Ensure that children are growing up in circumstances consistent with the provision of safe and effective; care; • Take actions to enable all children to have the best outcomes;
Safeguarding vulnerable adults	• Protect rights of adults to live in safety, free from abuse and neglect; • Work together to prevent and stop both the risks and experience of abuse or neglect; • Make sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action; • Recognize that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being;
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. It defines the term "sexual abuse"

Issues	Definition
	as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.[3]
Sexual Harassment	Any action or comment known to be offensive, embarrassing, humiliating, demeaning or unwelcome to the recipient with sexual overtones either direct or indirect notions. Sexual harassment includes[4] a. Unwelcome sexually determined behaviour (whether directly or by implication) as physical contact and advances; b. Attempts or efforts to establish physical relation having sexual implication by abuse of administrative, authoritative or professional powers; c. Sexually coloured verbal representation; d. Demand or request for sexual favours; e. Showing pornography; f. Sexually coloured remark or gesture; g. Indecent gesture, teasing through abusive language, stalking, joking having sexual implication; h. Insult through letters, telephone calls, cell phone calls, SMS, pottering, notice, cartoon, writing on bench, chair, table, notice boards, walls of office, factory, classroom, washroom having sexual implication; i. Taking still or video photographs for the purpose of blackmailing and character assassination; j. Preventing participation in sports, cultural, organizational and academic activities on the ground of sex and/or for the purpose of sexual harassment; k. Making love proposal and exerting pressure or posing threats in case of refusal to love proposal; l. Attempt to establish sexual relation by intimidation,

[3]United Nations, Glossary on Sexual Exploitation and Abuse, Second Edition (2007), p. 6.
[4] The definition as prescribed by the Honourable High Court Division in Writ Petition No. 5916/2008; Judgement pronounced on 14 May 2009.

Issues	Definition
	deception or false assurance.
Staff	Anyone who works for IDO.[5] This is to include directly or indirectly employed staff, trustees, contractors, consultants, volunteers and interns. Also to cover downstream implementing partners whom IDO provides fund. These downstream partners are expected to agree to work under the policy as a condition of their involvement with IDO.
Survivor	The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.
Vulnerable Adults	Women, persons with disabilities, dalits, people from ethnic communities, senior citizens, sick, refugees and whoever else may be recognized as vulnerable in any local, national or international context

4. Recruitment

IDO undertakes specific background check for candidates for employment. As per the Human Resources and Development Policy, reference checks are obtained from previous employers and reference indicated in the personal history are kept in the respective staff's personal file. However, IDO is not authorized to carry out criminal background check of the candidates for any recruitment.

From now on, any one interviewed for a post with IDO, either internally or from outside the organization, will need to show an understanding of safeguarding that is relevant to the role that they are applying for.

5. Expectations from Employees

Everyone working for IDO has a responsibilities to familiarize themselves with this safeguarding policy and the procedures thereof. They are expected to maintain a proper

[5] This is for the purpose of this Policy. It does necessarily have reference to the Human Resource Policy.

focus on the safety and welfare of children and vulnerable adults in all aspects of their work.

Anyone who works for the organization must inform their respective Supervisor/Manager if they or any adult living in their household become(s) the subject of an allegation involving a safeguarding concern or abuse against a child or vulnerable adult. In case of any confusion, they should seek advice from the respective Supervisor or Manager.
Any allegations of misconduct towards children and/or vulnerable adults by those working for IDO will be managed using the procedure thereof.

6. Safeguarding Training

IDO is committed to ensuring that everyone who works for the organization does understand their safeguarding responsibilities and do keep their knowledge up to date. All employees shall be provided safeguarding training within three months of joining. There will also be regular and refresher training for designated staff members on safeguarding children and vulnerable adults, including on specific areas of risk and safeguarding practice.

7. Safeguarding Officer

IDO, from its senior staff members, will designate one or more Safeguarding Officer. The Safeguarding Officer shall be responsible for implementation of this policy and related operational plan, and maintaining of the register of safeguarding. The partner organization is required to designate a Safeguarding Officer as well with similar objective.

8. Prevention of Abuse

IDO's responsibilities

IDO will:

- Ensure all staff members have access to, are familiar with, and know their responsibilities within the framework of this policy;
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with IDO. This

includes the way in which information about individuals in our programmes is gathered and communicated;

- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel;
- Ensure staff members receive training on safeguarding at a level commensurate with their role in the organization;
- Follow-up on reports of safeguarding concerns promptly and according to due process;

Staff Responsibilities

Safeguarding of Children

IDO staff and associated personnel shall not:

- Engage in sexual activity with anyone under the age of 18;
- Sexually abuse or exploit any child;
- Subject a child to physical, emotional or psychological abuse, or neglect;
- Engage in any commercially exploitative activities with children including child labour or trafficking;

Safeguarding of Adult

IDO staff and associated personnel shall not:

- Sexually abuse or exploit the adults who is at risk
- Subject an adult who is at risk to physical, emotional or psychological abuse, or neglect.

9. Protection from Sexual Exploitation and Abuse

IDO staff and associated personnel shall not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance;
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics;

Additionally, IDO staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy;
- Report any concerns or suspicions regarding safeguarding violations by an IDO staff member or associated personnel to the appropriate staff member.

10. Commitment

As part of the safeguarding policy IDO and all partner organizations will-

- Designate a Safeguarding Officer/Safeguarding Focal Person from senior staff members;
- Promote and prioritise the safety and wellbeing of children, women and persons with disabilities;
- Ensure that all of the staff members are properly oriented on IDO's Safeguarding Policy. Orientation on this policy will also be a part of capacity building of partner organizations so that they can endorse and implement the policy and compliance accordingly. This policy will be part of the policy framework within the Human Resources Manual which is required to be explained to every new staff member as part of their induction and they must confirm receipt and compliance with the policy with their signature (Please refer to Annex A for the acknowledgement form);
- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to sign of abuse, neglect and other safeguarding concerns relating to children, women and persons with disabilities;
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- Prevent the employment/deployment of unsuitable individuals;
- Ensure robust safeguarding arrangements and procedures are in operation;
- Keep a detailed register of safeguarding issues raised and process of dealing with them;
- Not tolerate possession or access to any material that is abusive towards children, women and persons with disabilities;
- Not engage children, women or persons with disabilities, in any form of sexual activity or acts, including paying for sexual services or acts, where under the law(s)

applicable to the child, the child is below the age of consent or the act(s) are an offence under relevant laws;

- Wherever possible, ensure that another adult is present with concerned staff member when working in the proximity of children;
- Not allow any of the staff members to invite unaccompanied children into their home, unless they are at immediate risk of injury or in physical danger;
- Refrain staff members from physical punishment or discipline of children and from hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

The policy and procedures will be widely disseminated and are mandatory for everyone involved with the IDO and its partner organizations. Failure to comply with this policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation. In appropriate case, funding may be suspended and/or partnership may be cancelled with concerned organization.

11. Reporting and Responding Procedures

Reporting

Reports may reach IDO through various means and routes. This may be in a structured format such as a letter, e-mail, text or message via social media. It may also be in the form of informal discussion or rumor. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to IDO's Safeguarding Officer.

Concerns

If a safeguarding concern is disclosed directly to astaff member, the person receiving the report should bear the following in mind:

- Listen
- Empathize with the person
- Ask who, when, where, what but not why
- Repeat/ check the understanding of the situation

- Report to the appropriate staff member

Documentation

The person receiving the report should then document the following information, using an Incident Report Form if there is one:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

Forwarding

Any staff member receiving or coming across any information or alleged incident of abuse shall report to the Safeguarding Officer immediately or within 24 hours at the latest.

Confidentiality

Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

12. Roles and Responsibilities for Case Management

The Safeguarding Officer will be the key person in managing the case.

If the report alleges a serious safeguarding violation, the Safeguarding Officer may wish to hold a case conference. This should include:

- Senior Management Team
- HR Manager/Coordinator

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders.

13. Provide Support to Survivor where needed/requested

The Safeguarding Officer, in consultation with the senior management, will provide appropriate support to survivor(s) of safeguarding incidents, if requested. This will be in line with the operational plan.

Assessing protection or security risks to stakeholders

For reports relating to serious incidents: Safeguarding Officer will undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case, and develop a mitigation plan if required.

Safeguarding Officer will continue to update the risk assessment and plan on a regular basis
throughout and after the case as required.

14. Decision on the Next Steps

Safeguarding Officer decides the next steps. These could be (but not limited to)

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organization's remit)
- Investigation is required to gather further information
- Immediate disciplinary action if no further information needed
- Referral to SMT

If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision making process will be different. Although associated personnel are not staff members, however, the IDO has a duty of care to protect anyone who comes into contact with any aspect of our programme from harm. IDO cannot follow disciplinary processes with individuals outside the organization, however, decisions may be made for example to terminate a contract with a supplier based on the actions of their staff.

If an investigation is required and the organization does not have internal capacity, IDO will identify resources to conduct the investigation.

15. Decision on Outcome of Investigation Report

Senior Management Team **(**SMT) will make a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct.

If at this or in any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the SMT together with other senior staff will need to decide on how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

In case of failureto act uponsuspectedor reportedthe victim will directly contact with the Ombudsperson.

The Safeguarding Officer will document all decisions made resulting from the case clearly and confidentially.

16. Learning and Improving

IDO, through implementation of this policy, is determined to keep improving knowledge and understanding of how best to protect children and vulnerable adults. It is to review related practices bi-annually to check whether it was effectively preventing and managing safeguarding in the work. The purpose of the reviews is to reflect on lessons about when the systems need to improve to protect children and adult in risk better in future.

The policy will be reviewed a year after development and then every two years, or in the following circumstances:

- Changes in legislation and/or government guidance

- As a result of any other significant change or event.
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Annex

IDO Human Resources Management and Development Policy–

Acknowledgement Form

Name of the Employee or Intern: _____

Position: _____

Department/Unit: _____

I have received, read and I fully understand all policies, guidelines and procedures included in the IDO Human Resources Manual.

In particular:

I have read the IDO Safeguarding Policy and I fully understand its contents. I do hereby confirm that I am in complete compliance with all provisions of the policy and that I will continue to observe the spirit of the commitment in all my activities on behalf of IDO. I will comply with the guidelines set out in these policies and understand that failure to do so might result in disciplinary or legal action.

Date: _____ Signature: _____

Please sign and return to the HR Team. This document will be filed in the employee's or intern's personal file.

Terms of Reference for

IDO Safeguarding Officer/Safeguard Focal Person

Background

The **Integrated Development Organization (IDO)** has developed the Safeguarding Policy for the employees of the IDO and its partner organizations. IDO believes that all individuals have right to live without fear, live free from sexual harassment and abuse, sexual violence, exploitation, and any abuse of power regardless of age, gender, sexuality, disability, religion and ethnicity. IDO is determined on zero tolerance policy for sexual abuse, exploitation and harassment by any of its employees, volunteers, consultants, partners or any other representatives associated with the delivery of its work carrying out any form of. This type of behavior is against IDO's beliefs, values and mission; and safeguarding is a priority of the IDO.

IDO has decided to designate a Safeguard Focal Person to ensure implementation of the Safeguarding Policy.

Roles and Responsibilities

Roles and responsibilities of the IDO Safeguard Focal Person is to support IDO in day-to-day implementation of the IDO Safeguarding Policy with technical support from the Senior Management Team.

Specific duties include-

- To act as the main point of contact within IDO for safeguarding;
- To ensure that staff members and partners are aware of the IDO Safeguarding Policy and their responsibilities under it (for example by providing training and guidance);
- To advise and support staff members and partners with the implementation of the safeguarding policy, including risk assessments;
- To ensure that all the staff members of IDO and partner organizations are properly oriented on the Safeguarding Policy;
- To ensure that everyone understands their roles and responsibilities in respect of the safeguarding policy and is provided with appropriate learning opportunities to recognize, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, women and vulnerable people;
- To ensure that the name and contact details of the Safeguard Focal Person(s) are made available so that people know how to raise a concern/where to seek advice;
- To act as first point of contact for concerns regarding protection incidents of children, women and vulnerable people and to raise those concerns to the Senior Management team as appropriate;
- To ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- To undertake an immediate risk assessment for reports relating to serious incidents to determine whether there are any current or potential risks to any stakeholders involved in the case, and develop a mitigation plan if required;

- To update the risk assessment and plan on a regular basis throughout and after the case as required;
- To document all decisions made resulting from the case clearly and confidentially;
- To support the implementation and monitoring of the Safeguarding Policy by providing an annual progress report to the Senior Management Team together with a plan for further action required to implement the Safeguarding Policy at all levels.

Skills and Characteristics

- Have knowledge and experience about safeguarding and protection of children, women and vulnerable people;
- Have respect and authority within the office so that her/his opinions are valued;
- Be approachable, with good communication skills with adults and children;
- Be able to keep calm when a concern is raised, especially if anyone needs assistance;
- Be able to work with others to ensure that the policy is implemented, and respond where an incident related to protection of children, women and vulnerable people occurs;
- Commitment to safeguarding children, women and vulnerable people and upholding their rights – together with the ability to advocate for and defend safeguarding;
- Training and presentation skills;
- Be able to keep information confidential.