

BAKULTALI MAHILA SANGSHAD



SAFEGUARDING POLICY



1. Introduction

Bakultali Mahila Sangshad (BMS) is a community-based organization committed to promoting the rights, dignity, and well-being of women, girls, children, and vulnerable populations through its humanitarian, development, and social protection interventions. In carrying out its mission, BMS recognizes its responsibility to create and maintain a safe, inclusive, and respectful environment for all individuals who are part of the organization, including community members, program participants, staff, volunteers, partners, and stakeholders.

BMS has zero tolerance for sexual exploitation, abuse, harassment, and any form of harm, neglect, or violence committed by its representatives or associated personnel. As a humanitarian partner working alongside national and international actors, BMS is committed to upholding the highest standards of ethical conduct, accountability, and safeguarding.

This Safeguarding Policy outlines BMS's commitment to preventing and responding to sexual exploitation, abuse and harassment (SEAH), and other safeguarding concerns, in line with humanitarian principles, national laws, and international safeguarding standards. The policy provides a framework for ensuring that all BMS activities are implemented in a manner that prioritizes the safety, dignity, and rights of all individuals, particularly women, children, and other at-risk groups.

1.1 Legal Framework

The Safeguarding Policy of BMS is grounded in internationally recognized human rights principles, humanitarian standards, donor safeguarding requirements, and the national legal framework of Bangladesh. These instruments collectively guide BMS in preventing harm, abuse, exploitation, neglect, discrimination, and harassment, and in promoting safe, dignified, and inclusive environments for all individuals engaged in or affected by BMS's work.

1.1.1 International Policies and Guidelines

BMS aligns its safeguarding commitments with key international human rights treaties that affirm the rights, dignity, and protection of all people, with particular attention to women, children, and persons with disabilities:

- Universal Declaration of Human Rights (UDHR).
- Convention on the Rights of the Child (CRC).
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).
- Convention on the Rights of Persons with Disabilities (CRPD).
- Core Humanitarian Standards (CHS) and the CHS Framework for Quality and Accountability.
- Inter-Agency Standing Committee (IASC) Guidelines on Protection from Sexual Exploitation and Abuse, as part of broader safeguarding responsibilities.
- Minimum Operating Standards for PSEA (MOS-PSEA).
- International Child Safeguarding Standards developed by *Keeping Children Safe*.
- UN Code of Conduct for International Civil Servants.
- BMZ Social Protection Strategy: "Investing in People's Security and Protection Against Crises"



- OECD Development Assistance Committee (DAC) Recommendation on Ending Sexual Exploitation, Abuse, and Harassment.
- EU Humanitarian Aid Safeguarding Requirements.
- TdH's Safeguarding Policy.
- CARE International's Safeguarding Policy.
- UK FCDO Safeguarding Framework.
- USAID Safeguarding, PSEA, and Child Protection Policies.
- UNICEF policy's on Safeguarding.
- UNICEF Safeguarding Children Policy.
- UN Women Policy on Sexual Harassment, Sexual Exploitation and Abuse.
- ILO Convention No. 190 on Violence and Harassment in the World of Work.
- ILO Recommendation No. 206.

1.1.2 National Legal Framework of Bangladesh

The Safeguarding Policy of BMS complies with the constitutional and legal obligations of Bangladesh, including:

- The Constitution of the People's Republic of Bangladesh.
- Bangladesh Labour Act, 2006 and Labour Rules, 2015 (Amended 2022).
- High Court Directives on Sexual Harassment (2009).
- Penal Code, 1860.
- Women and Children Repression Prevention Act, 2000.
- The Prevention and Suppression of Human Trafficking Act, 2012.
- Marriage Restraint Act, 2017.

These laws establish enforceable duties to protect individuals from violence, abuse, exploitation, and discrimination.

1.2 Purpose of the Policy

The purpose of this Safeguarding Policy is to affirm BMS commitment to preventing and responding to all forms of harm, abuse, exploitation, neglect, discrimination, and harassment associated with its work. Guided by international human rights principles, humanitarian standards, donor safeguarding requirements, and the national laws of Bangladesh, this policy establishes a comprehensive framework to ensure the safety, dignity, and well-being of all BMS's stakeholders. Specifically, this policy aims to;

- I. **Protect children, women, persons with disabilities, and other at-risk individuals** from all forms of physical, sexual, emotional, and psychological harm, abuse, exploitation, and neglect.
- II. **Promote safe, respectful, and inclusive environments** across all BMS programs, operations, and workplaces.
- III. **Define clear safeguarding responsibilities and standards of behavior** for staff, management, board members, volunteers, consultants, partners, and representatives of BMS.
- IV. **Prevent safeguarding risks** through awareness, capacity strengthening, risk assessment, and integration of safeguarding measures into organizational systems and programs.
- V. **Establish safe, accessible, and confidential mechanisms** for reporting safeguarding concerns, complaints, or allegations without fear of retaliation.



- VI. **Ensure timely, fair, and survivor-centered responses** to safeguarding incidents, prioritizing the best interests, rights, and needs of affected individuals.
- VII. **Strengthen organizational accountability and compliance** with international conventions, humanitarian standards, donor requirements, and national legislation.
- VIII. **Foster a culture of zero tolerance** for abuse, exploitation, harassment, and misuse of power, while promoting ethical conduct and integrity.

Through this policy, BMS seeks to uphold its duty of care, reinforce public trust, and contribute to a humanitarian and development sector that respects human dignity, equality, and safety at all levels.

1.3 Scope of Applications

This Safeguarding Policy applies to all individuals, activities, and operations associated with BMS, regardless of role, location, or contractual status. The policy is mandatory and forms an integral part of BMS's organizational governance and accountability framework. This policy applies to, but is not limited to:

- i. All BMS staff members, including permanent, temporary, part-time, and contractual employees
- ii. Board members, management, and executive leadership of BMS
- iii. Volunteers, interns, apprentices, and community facilitators
- iv. Consultants, contractors, and service providers engaged by BMS
- v. Partners, sub-partners, and implementing organizations working with or on behalf of BMS
- vi. Any other individual who represents BMS or is associated with BMS activities.
- vii. Program Participant of BMS

1.4 Definition of Key Terms

Abuse: The term abuse as used in this policy encompasses: sexual harassment, intimidation, violence, bullying, humiliation, discrimination, neglect and exploitation (BRAC, 2019).

Discrimination: Discrimination is any unfair treatment or arbitrary distinction based on a person's race, sex, gender, sexual orientation, gender identity, gender expression, religion, nationality, ethnic origin, disability, age, language, social origin or other similar shared characteristic or trait (UN Women, 2024).

Harm: Physical or psychological damage or impact caused to an individual, whether it is caused intentionally or accidentally, or by acts or omissions, as a result of their contact with organization or the work of the organization as set out in this Policy (UNICEF, 2025).

Safeguarding: refers to actions taken to prevent and respond to Harm caused to any individual because of their contact with organization or the work of the organization (UNICEF, 2025).

Sexual Abuse: Any conduct of a sexual nature that abuses, humiliates, degrades or otherwise violates the dignity of the victim (Ministry of Women and Children Affairs, 2010).



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 (United Nations, 2003).

Sexual Harassment: Sexual Harassment includes (1) undesirable sexual appeal (direct or gesture) which indicated to made sexual relationship; (2) For fulfilling the sexual urge to established sexual relation by using the administrative power; (3) Sexual appeal in facial expression; (4) Request or desire to sexual oath; (5) exhibition of pornography; (6) Sign or gesture-posture of sexual appeal; (7) unacceptable gesture, intending harassing language or word, sexually provoking jokes; (8) intended writing word which is sexually provoking jokes in letters, telephone call, mobile call, SMS, posturing, notice, industry, classroom and public toilet; (9) recording still and videos to fulfill the purpose of Blackmailing or blaming the character; (10) restricting or refusing the participation from sports, cultural and institutional programme, curricular activities for the cause of sexual harassment; (11) proposal for affairs and providing pressure and provoking fear for refusal the proposal; (12) trying to build the sexual relationship by pretending or false promising (Ministry of Women and Children Affairs, 2013).

2. Policy Statement

BMS is committed to safeguarding the rights, dignity, and well-being of all individuals connected to its programs, services, and operations, particularly children, women, persons with disabilities, and others at heightened risk of harm. In this regard, BMS applies a zero-tolerance approach to abuse, exploitation, harassment, neglect, and misuse of power, including SEAH, child abuse, gender-based violence, trafficking, coercion, or any act or omission that results in, or creates a risk of, harm. Moreover, Safeguarding is a mandatory responsibility for all persons associated with BMS, and compliance with this policy is required at all times as an integral part of BMS governance, management, programming, employment, and partnership arrangements. To meet this obligation, BMS commits to:

- I. Establishing and maintaining preventive measures, including risk assessments, due diligence, safe recruitment, codes of conduct, and mandatory training
- II. Providing reporting channels that are safe, accessible, confidential, and appropriate to the needs of affected populations
- III. Ensuring allegations are addressed promptly, impartially, and in a survivor-centered, rights-based, and confidential manner
- IV. Taking all reasonable steps to protect survivors, complainants, witnesses, and whistleblowers from retaliation, intimidation, or adverse consequences
- V. Applying disciplinary, administrative, contractual, or legal measures, including termination and referral to competent authorities, where violations are substantiated
- VI. Cooperating fully with national authorities in Bangladesh and with donor or regulatory bodies, consistent with applicable law and with due regard to safety, best interests, and informed consent

Compliance with this Safeguarding Policy is mandatory and a condition of employment, engagement, or partnership with BMS. Failure to comply, failure to report concerns, or actions that obstruct or interfere with safeguarding processes may result in disciplinary action up to and including dismissal, termination of contracts, and referral to law enforcement or other authorities.



3. Principles of Safeguarding

BMS adheres to the following core principles to guide the implementation of its Safeguarding Policy and to ensure the protection, dignity, and well-being of all individuals associated with or affected by its work:

- I. BMS is committed to preventing harm, abuse, exploitation, neglect, and harassment in all its activities. Safeguarding measures are integrated into all programs, operations, and organizational processes to reduce risks to individuals and communities.
- II. BMS maintains a zero-tolerance approach toward all forms of abuse, exploitation, harassment, discrimination, or misconduct. Any violation of this policy is treated as a serious breach of organizational values, with appropriate disciplinary or legal action.
- III. BMS prioritizes the rights, safety, and best interests of children. All actions, decisions, and programs affecting children are guided by the principles of the CRC and national child protection laws.
- IV. BMS upholds the rights, dignity, and equality of all individuals, including women, children, persons with disabilities, and other vulnerable groups. Safeguarding practices are rooted in international human rights instruments such as CEDAW, CRPD, and UDHR.
- V. BMS is accountable to communities, beneficiaries, staff, partners, and donors. The organization ensures transparent reporting, monitoring, and learning mechanisms to maintain trust and responsibility in safeguarding matters.
- VI. BMS ensures that responses to safeguarding concerns prioritize the safety, well-being, and informed consent of survivors. Survivors are treated with respect, confidentiality, and without judgment or retaliation.
- VII. BMS protects personal information and maintains strict confidentiality of safeguarding reports and investigations. Information is shared only on a need-to-know basis, in line with legal requirements and organizational protocols.
- VIII. BMS promotes inclusive, equitable, and respectful environments. Safeguarding measures address the specific needs of marginalized and vulnerable groups and aim to eliminate discrimination or bias in all its forms.
- IX. BMS proactively identifies safeguarding risks and implements mitigation measures. The organization is committed to learning from experiences, complaints, and best practices to continuously improve safeguarding systems.
- X. Safeguarding is the responsibility of everyone associated with BMS, including staff, management, board members, volunteers, consultants, partners, and contractors. All personnel are expected to adhere to safeguarding standards and actively contribute to a safe organizational culture.

4. Safeguarding in Implementation Framework

Safeguarding is embedded at every stage of BMS program and operational implementation to ensure the protection, dignity, and well-being of all individuals engaged in or affected by its work. BMS integrates safeguarding considerations into planning, program design, service delivery, monitoring, evaluation, and reporting. Through this framework, safeguarding principles are operationalized by:

- I. Establish Safeguarding Focal Points at institutional and program levels to lead implementation, oversight, and coordination. Program-level Focal handle frontline duties including risk



assessments, training delivery, reporting intake, compliance checks, and community accountability sessions, while reporting to the institutional lead.

- II. Conduct thorough risk assessments and develop tailored mitigation plans for all programs, activities, partnerships, and operations to proactively address vulnerabilities like gender-based violence or exploitation.
- III. Implement robust safe recruitment, induction, and ongoing training for staff, volunteers, contractors, and partners, ensuring full awareness of the Code of Conduct and compliance obligations.
- IV. Create accessible, confidential, survivor-centered reporting, referral, and response systems that prioritize safety, immediate support, and fair investigation without retaliation.
- V. Regularly monitor adherence to safeguarding standards, evaluate effectiveness, and integrate lessons learned to enhance policies, programs, and practices continuously.
- VI. Ensure transparency and accountability to communities, beneficiaries, staff, and partners, while cultivating a culture of respect, inclusivity, and absolute zero tolerance for abuse or exploitation.

By integrating these legal and policy requirements into all stages of implementation, BMS ensures that safeguarding is systematic, proactive, and aligned with both national obligations and international best practices, reinforcing its commitment to the safety and dignity of all individuals.

4.1 Risk Assessment and Management

BMS recognizes that effective safeguarding requires proactive identification, assessment, and management of risks that may expose individuals to harm, abuse, exploitation, neglect, discrimination, or harassment. In this regard, BMS integrates safeguarding risk assessment and management into all aspects of its programs, operations, and organizational systems.

- 4.1.1 BMS commits to conducting regular safeguarding risk assessments during program design, implementation, monitoring, and review to identify potential risks to children, women, persons with disabilities, staff, volunteers, and community members. Risk assessments will consider contextual, environmental, operational, and power-related factors, including location, type of activity, level of interaction with vulnerable groups, staffing arrangements, and partner capacities.
- 4.1.2 Based on identified risks, BMS will develop and implement risk mitigation measures, which may include strengthened supervision, safe recruitment practices, staff rotation, community engagement, enhanced reporting mechanisms, capacity building, and partnership due diligence. Safeguarding risks and mitigation actions will be clearly documented, monitored, and reviewed regularly.
- 4.1.3 Safeguarding risk management is a shared responsibility. Management is accountable for ensuring risks are addressed and mitigated, while all staff, volunteers, and partners are responsible for remaining vigilant, reporting emerging risks, and complying with safeguarding controls. High-risk activities and contexts will receive enhanced oversight and periodic review.
- 4.1.4 Through systematic risk assessment and management, BMS aims to prevent harm before it occurs, strengthen organizational accountability, and ensure that safeguarding is embedded as a continuous and adaptive process across all programs and operations.



4.2 Recruitment

BMS integrates safeguarding throughout the human resource management process to ensure a safe and respectful working environment for all staff, volunteers, and partners, and to protect program participants and communities. Safeguarding is embedded in recruitment, onboarding, and personnel management. Key practices include:

- 4.2.1 **Job Announcements:** All job advertisements explicitly communicate BMS's commitment to safeguarding, ethical conduct, zero tolerance for abuse or harassment, and the requirement for adherence to the Safeguarding Policy.
- 4.2.2 **Vetting and Background Checks:** All candidates undergo rigorous screening, including verification of references, criminal record checks where applicable, and assessment of prior safeguarding history, to prevent recruitment of individuals posing a safeguarding risk.
- 4.2.3 **Self-Declaration:** Applicants are required to complete a safeguarding self-declaration, disclosing any past convictions, allegations, or disciplinary actions related to abuse, exploitation, harassment, or misconduct.
- 4.2.4 **Onboarding:** All new staff, volunteers, and partners undergo formal onboarding processes that include orientation on safeguarding responsibilities, organizational policies, reporting mechanisms, and expected standards of behavior.
- 4.2.5 **Orientation and Training:** Regular induction and refresher training are conducted to ensure personnel understand safeguarding principles, policies, procedures, and their duty of care obligations, reinforcing a culture of accountability, respect, and ethical conduct.
- 4.2.6 **Ongoing HR Alignment:** Safeguarding considerations are integrated into performance management, promotion, disciplinary procedures, and contract management. Non-compliance with safeguarding requirements is treated as a serious breach of conduct, with appropriate disciplinary or legal actions taken.

Through these measures, BMS ensures that its HR processes systematically prevent, identify, and address safeguarding risks, protecting staff, partners, and communities, while promoting a safe, inclusive, and professional organizational culture in line with national legislation and international best practice.

4.3 Roles and Responsibilities

BMS ensures that safeguarding is everyone's responsibility. Thus, clear roles and responsibilities at each level of the organization help prevent abuse, exploitation, neglect, harassment, and misconduct, and ensure prompt, effective, and survivor-centered responses.

4.3.1 Executive Committee

The Executive Committee provides strategic leadership, governance, and oversight to ensure safeguarding is prioritized across all levels of BMS. Their key responsibilities include:

- 4.3.1.1 Approving and periodically reviewing the Safeguarding Policy and related procedures.
- 4.3.1.2 Ensuring the organization allocates sufficient resources for safeguarding implementation, monitoring, and capacity building.
- 4.3.1.3 Holding senior management accountable for compliance with safeguarding standards and legal obligations.
- 4.3.1.4 Promoting a culture of zero tolerance toward abuse, exploitation, harassment, and misconduct.



- 4.3.1.5 Reviewing safeguarding reports, trends, and organizational risk assessments to guide strategic decision-making.

4.3.2 Senior Management

The Management Team is responsible for operationalizing safeguarding policies and embedding safeguarding into organizational systems and programs. Key responsibilities include:

- 4.3.2.1 Implementing the Safeguarding Policy across all programs, offices, and activities.
- 4.3.2.2 Ensuring staff, volunteers, consultants, and partners understand their safeguarding responsibilities.
- 4.3.2.3 Integrating safeguarding risk assessments into program planning, design, and monitoring.
- 4.3.2.4 Acting on safeguarding concerns promptly, fairly, and confidentially.
- 4.3.2.5 Supporting the Safeguarding Focal Point/Officer in monitoring compliance and reporting incidents to the Board.
- 4.3.2.6 Ensuring safeguarding is embedded in HR processes, including recruitment, onboarding, training, and performance management.

4.3.3 Staff and Volunteers

All staff, interns, and volunteers are responsible for upholding safeguarding standards in their day-to-day work. Their responsibilities include:

- 4.3.3.1 Familiarizing themselves with the Safeguarding Policy, Code of Conduct, and reporting procedures.
- 4.3.3.2 Treating all individuals, especially children, women, and vulnerable groups, with dignity, respect, and fairness.
- 4.3.3.3 Reporting any safeguarding concerns, suspicions, or violations promptly and through established channels.
- 4.3.3.4 Cooperating fully with investigations while maintaining confidentiality and protecting survivors.
- 4.3.3.5 Participating in safeguarding training, briefings, and refresher sessions as required.

4.3.4 Safeguarding Focal Point / Officer

The Safeguarding Focal Point or Officer serves as the primary coordinator and advisor on safeguarding matters. Their responsibilities include:

- 4.3.4.1 Providing guidance and support to staff, management, and partners on safeguarding issues.
- 4.3.4.2 Receiving, documenting, and managing safeguarding concerns in a confidential and survivor-centered manner.
- 4.3.4.3 Ensuring all safeguarding reports are assessed and referred appropriately to relevant authorities or protection services.
- 4.3.4.4 Coordinating safeguarding training, awareness sessions, and capacity-building activities for staff and partners.
- 4.3.4.5 Monitoring implementation of safeguarding measures, policies, and procedures.
- 4.3.4.6 Maintaining records and preparing reports for management and the Board, highlighting trends, risks, and recommendations for improvement.



4.4 Prevention Measure

BMS adopts a proactive and systematic approach to safeguarding prevention, in line with international human rights conventions, humanitarian safeguarding standards, donor requirements, and the national legal framework of Bangladesh. Preventive measures are embedded across human resource management, program implementation, community engagement, and organizational culture to minimize risks of harm, abuse, exploitation, neglect, discrimination, and harassment.

4.4.1 Training and Awareness Programs

BMS ensures continuous safeguarding capacity development on safeguarding, PSEAH, GESI and HR manuals. BMS commits to:

- 4.4.1.1 Mandatory safeguarding induction for all staff, volunteers, interns, consultants, and partners.
- 4.4.1.2 Regular refresher training on safeguarding, child protection, PSEAH, and ethical conduct.
- 4.4.1.3 Specialized training in management, safeguarding focal points, and staff working directly with children and vulnerable groups.
- 4.4.1.4 Awareness sessions for communities and program participants on safeguarding rights, expected behavior, and reporting mechanisms.
- 4.4.1.5 Delivery of safeguarding information in accessible, inclusive, and culturally appropriate formats.

4.4.2 Code of Conduct for Staff and Volunteers

- 4.4.2.1 BMS maintains a mandatory Code of Conduct to ensure that all board members, management, staff, volunteers, consultants, partners, and representatives uphold the highest standards of ethical and professional behavior in the delivery of its programs and operations.
- 4.4.2.2 The Code of Conduct strictly prohibits all forms of abuse, exploitation, harassment, discrimination, violence, intimidation, and misuse of power. It establishes clear expectations regarding respectful behavior, professional boundaries, appropriate use of authority, and responsible conduct in both physical and digital environments.
- 4.4.2.3 All individuals associated with BMS are required to comply with this Code at all times and to report any suspected or actual breach through established safeguarding mechanisms. Violations of the Code of Conduct will result in disciplinary action, termination of engagement, and/or referral to relevant authorities in accordance with applicable laws and organizational procedures.

4.4.3 Child Protection Guidelines

- 4.4.3.1 BMS is firmly committed to safeguarding children from all forms of abuse, neglect, exploitation, and harm. The Child Protection Guidelines prioritize the best interests of the child, ensure non-discrimination, and promote children's dignity, participation, and safety in all BMS programs and activities.
- 4.4.3.2 They strictly prohibit any form of child abuse, sexual exploitation, child labor, trafficking, early marriage, or inappropriate interaction with children. BMS requires safe, supervised, and age-appropriate engagement with children, informed consent for the use of children's images and personal data, and mandatory reporting of any child safeguarding concern or allegation.
- 4.4.3.3 These guidelines are binding on all individuals associated with BMS, and non-compliance will result in disciplinary and legal action, reinforcing BMS's zero-tolerance approach to child harm.



4.5 Partnership and Collaboration

BMS recognizes that effective safeguarding requires strong partnerships and collective responsibility across the humanitarian and development sector. BMS ensures that safeguarding is a core component of all partnerships and collaborative arrangements. BMS commits to:

- 4.5.1 All partners, sub-partners, contractors, and service providers engaged by BMS are required to adhere to safeguarding standards that meet or exceed the minimum requirements set out in this Safeguarding Policy.
- 4.5.2 Integrating safeguarding requirements, roles, and responsibilities into partnership agreements, contracts, and memoranda of understanding.
- 4.5.3 Assessing partners' safeguarding capacities and systems during due diligence and throughout the partnership lifecycle.
- 4.5.4 Supporting partners to strengthen safeguarding awareness, policies, and practices where needed.
- 4.5.5 Sharing safeguarding information, good practices, and lessons learned with partners, while respecting confidentiality and data protection principles.
- 4.5.6 Coordinating with relevant government authorities, protection services, and referral networks in line with national legal obligations.
- 4.5.7 Cooperating with donors and humanitarian coordination mechanisms on safeguarding reporting and accountability.
- 4.5.8 BMS will take appropriate action where partners fail to meet safeguarding standards, including corrective measures, suspension, or termination of partnerships.

4.6 Communication and Awareness

BMS recognizes that effective safeguarding depends on clear communication, shared understanding, and informed participation of all stakeholders. BMS is committed to ensuring that safeguarding principles, responsibilities, and reporting mechanisms are widely understood and accessible to staff, partners, communities, and program participants.

4.6.1 Dissemination of the Policy to All Stakeholders

BMS will ensure that this Safeguarding Policy is formally communicated and made accessible to all relevant stakeholders. The policy will be disseminated to board members, management, staff, volunteers, consultants, partners, and service providers through appropriate channels, including induction processes, training, internal communications, and contractual documentation. BMS commits to:

- 4.6.1.1 Providing copies of the Safeguarding Policy and Code of Conduct to all personnel upon recruitment or engagement.
- 4.6.1.2 Requiring written acknowledgment of understanding and compliance.
- 4.6.1.3 Making the policy available in relevant local languages and accessible formats.
- 4.6.1.4 Displaying safeguarding information and reporting channels in offices, field locations, and program sites.
- 4.6.1.5 Ensuring partners and contractors receive and comply with safeguarding requirements as part of formal agreements.



4.6.2 Public Awareness Campaigns on Safeguarding

BMS is committed to raising awareness of safeguarding among communities and program participants to promote prevention, accountability, and empowerment. BMS will conduct culturally appropriate and inclusive public awareness activities to inform individuals of their rights, expected standards of behavior, and available reporting mechanisms. Public awareness initiatives may include:

- 4.6.2.1 Community meetings, orientation sessions, and awareness workshops.
- 4.6.2.2 Child-friendly and survivor-centered communication materials.
- 4.6.2.3 Information campaigns using posters, leaflets, audio-visual materials, and digital platforms.
- 4.6.2.4 Engagement with community leaders and local institutions to promote safeguarding norms.

4.6.3 Data Protection

BMS is committed to protecting the privacy, dignity, and safety of all individuals associated with its programs and operations, particularly children and other at-risk groups. BMS ensures responsible and ethical use of media and personal data. BMS commits to:

- 4.6.3.1 Collect, store, use, and share personal data only for legitimate programmatic, operational, or legal purposes.
- 4.6.3.2 Obtain informed and voluntary consent prior to collecting or using personal information, images, audio, or video recordings, with additional safeguards for children and persons with disabilities.
- 4.6.3.3 Ensure that images and stories are used in a manner that respects dignity, avoids harm, and does not expose individuals to risk, stigma, or retaliation.
- 4.6.3.4 Prohibit the use of media that is misleading, exploitative, sexualized, or discriminatory.
- 4.6.3.5 Apply heightened protection for children's data, including parental or guardian consent and child-appropriate communication.
- 4.6.3.6 Restrict access to safeguarding-related information on a strict need-to-know basis.
- 4.6.3.7 Store physical and digital records securely and limit data retention to necessary periods.
- 4.6.3.8 Share safeguarding information only with authorized persons and relevant authorities, in compliance with legal and donor requirements.
- 4.6.3.9 All staff, volunteers, and partners are required to adhere to BMS media and data protection standards when handling personal information or engaging with media platforms, including social media.
- 4.6.3.10 Any breach of confidentiality, misuse of media, or unauthorized disclosure of data will be treated as a serious violation of the Safeguarding Policy and may result in disciplinary or legal action.

4.7 Reporting Mechanisms

BMS is committed to ensuring that all safeguarding concerns, suspicions, or incidents are reported safely, promptly, and without fear of retaliation. Effective reporting mechanisms are essential to preventing harm, ensuring accountability, and enabling timely, survivor-centered responses.

4.7.1 How to Report Concerns or Incidents

- 4.7.1.1 Any individual associated with BMS including staff, volunteers, partners, program participants, and community members may report safeguarding concerns or incidents.



- 4.7.1.2 Reports may relate to actual or suspected abuse, exploitation, neglect, harassment, discrimination, or any other safeguarding violation.
- 4.7.1.3 Safeguarding concerns can be reported through the following channels:
- Directly to the Safeguarding Focal Point/Officer.
 - To a line manager or senior management, who must immediately escalate the concern.
 - Through designated confidential reporting channels (e.g., telephone, email, complaint boxes, or other approved mechanisms).
 - Verbally or in writing, in a language and format accessible to the reporter.
- 4.7.1.4 All staff, volunteers, and partners have a mandatory obligation to report safeguarding concerns immediately upon becoming aware of them.
- 4.7.1.5 Reports may be made anonymously, and individuals are encouraged to report in good faith, even if they are unsure whether a concern constitutes a safeguarding violation.

4.7.2 Confidentiality and Whistleblower Protections

BMS is committed to protecting the confidentiality, safety, and rights of all individuals involved in safeguarding reports. In line with national laws and international safeguarding standards, all reports will be handled with the highest level of discretion. BMS commits to:

- 4.7.2.1 Treat all safeguarding reports as confidential and share information strictly on a need-to-know basis.
- 4.7.2.2 Protect the identity of reporters, survivors, and witnesses to the maximum extent possible.
- 4.7.2.3 Prohibit retaliation, intimidation, harassment, or discrimination against individuals who report concerns in good faith.
- 4.7.2.4 Take disciplinary action against anyone who attempts to retaliate against or obstruct a safeguarding report.
- 4.7.2.5 Whistleblowers who raise safeguarding concerns honestly and responsibly will not face adverse consequences, even if allegations are not substantiated.

4.7.3 Support for Survivors

BMS recognizes the emotional, social, and professional risks that may be associated with reporting safeguarding concerns and is committed to providing appropriate support to reporters. BMS will:

- 4.7.3.1 Ensure reporters are treated with respect, sensitivity, and dignity.
- 4.7.3.2 Provide clear information on reporting procedures and next steps.
- 4.7.3.3 Offer access to psychosocial support, counseling, or referral services where appropriate.
- 4.7.3.4 Implement reasonable measures to protect reporters from harm or retaliation.
- 4.7.3.5 Ensure that survivors and reporters are informed of available support services and referral pathways.

4.8 Response, Investigation, and Case Management

BMS is committed to responding promptly, fairly, and effectively to all safeguarding concerns, allegations, and incidents. All responses and case management actions are guided by the principles of safety, confidentiality, survivor-centeredness, accountability, and due process, in line with national legislation of Bangladesh, international human rights conventions, and humanitarian safeguarding standards.



4.8.1 Immediate Response

- 4.8.1.1 Upon receiving a safeguarding report, BMS will take immediate action to ensure the safety and well-being of the survivor and any other individuals at risk. This may include removing the alleged perpetrator from duties, securing the environment, and facilitating access to urgent medical, psychosocial, or protection services.
- 4.8.1.2 In cases involving children, the best interests of the child will be the primary consideration in all actions.

4.8.2 Assessment and Referral

- 4.8.2.1 All safeguarding reports will be promptly assessed by the Safeguarding Focal Point/Officer to determine the nature, severity, and appropriate course of action.
- 4.8.2.2 If the law requires it or someone is in immediate danger, we will quickly tell the right authorities, child protection groups, lawyers, or support services.

4.8.3 Investigation

- 4.8.3.1 BMS will ensure that safeguarding investigations are conducted in a timely, impartial, and confidential manner, respecting the rights of all parties involved.
- 4.8.3.2 Investigations will follow established procedures and be conducted by trained personnel or external investigators where necessary.
- 4.8.3.3 The investigation process will ensure fairness, avoid conflicts of interest, and adhere to principles of due process, while prioritizing the safety and dignity of survivors.

4.8.4 Case Management

- 4.8.4.1 All safeguarding cases will be documented, tracked, and managed securely by the Safeguarding Focal Point/Officer in accordance with data protection and confidentiality requirements.
- 4.8.4.2 Case management will include risk assessment, action planning, follow-up, and coordination with relevant services and authorities. Survivors will be informed, where appropriate, of the progress and outcomes of their case.

4.8.5 Disciplinary and Corrective Actions

- 4.8.5.1 Where allegations are substantiated, BMS will take appropriate disciplinary, contractual, or administrative actions, which may include termination of employment or partnership and referral to law enforcement authorities in line with national laws. Corrective actions will also be taken to address systemic gaps and prevent recurrence.

4.8.6 Learning and Continuous Improvement

- 4.8.6.1 BMS will use safeguarding cases, trends, and lessons learned to strengthen prevention measures, policies, and procedures. Safeguarding incidents will be reviewed periodically to identify risks, improve response mechanisms, and reinforce organizational accountability.



4.9 Monitoring, Review, and Accountability

BMS is committed to ensuring the effective implementation, continuous improvement, and organizational accountability of this Safeguarding Policy. Monitoring, review, and accountability mechanisms are essential to ensuring compliance with national legislation, international safeguarding standards, donor requirements, and BMS's ethical obligations to the communities it serves.

4.9.1 Monitoring

- 4.9.1.1 BMS will establish systematic processes to monitor the implementation of safeguarding measures across all programs, operations, and partnerships. This includes regular monitoring of compliance with safeguarding procedures, codes of conduct, risk mitigation measures, training coverage, and reporting mechanisms.
- 4.9.1.2 Safeguarding indicators will be integrated into organizational monitoring and evaluation systems, and findings will be documented and reviewed by management.
- 4.9.1.3 The Safeguarding Focal Point/Officer will play a key role in coordinating safeguarding monitoring, maintaining records, and identifying trends, gaps, and emerging risks.
- 4.9.1.4 Monitoring activities will be proportionate to the level of safeguarding risk and will give particular attention to programs involving children and other at-risk groups.

4.9.3 Accountability

- 4.9.3.1 BMS upholds a culture of accountability at all levels of the organization. The Board of Directors has ultimate oversight responsibility for safeguarding, while management is accountable for implementation and enforcement. All staff, volunteers, and partners are individually responsible for complying with the Safeguarding Policy and reporting concerns.
- 4.9.3.2 Non-compliance with safeguarding obligations, failure to report concerns, or breaches of this policy will result in appropriate disciplinary, contractual, or legal action, in line with national laws and organizational procedures. BMS will also take corrective actions to address systemic weaknesses identified through monitoring or incident reviews.
- 4.9.3.3 Through robust monitoring, regular review, and clear accountability mechanisms, BMS ensures that safeguarding remains a living commitment, embedded in practice, strengthened through learning, and upheld with integrity across all levels of the organization.

5. Annual Review of the Policy

- 5.1 BMS will conduct a comprehensive review of its Safeguarding Policy bi-annually to ensure it remains effective, relevant, and aligned with national laws, international standards, donor requirements, and organizational experience.
- 5.2 The review will assess policy effectiveness, analyze safeguarding incidents, identify gaps, incorporate lessons learned, and consider updates to legal or sectoral frameworks.
- 5.3 The Safeguarding Focal Point/Officer will coordinate the process and present recommendations to the executive committee for approval. Any revisions will be communicated to all stakeholders and integrated into training and operational procedures, ensuring continuous improvement and accountability.



6. Concluding Remarks

This safeguarding policy aligns with international standards, committing the organization to protect all individuals including program participants, staff, volunteers, and partners from harm, abuse, exploitation, and harassment. BMS adopt a zero-tolerance approach, mandating confidential reporting, thorough investigations, and supportive responses.

All stakeholders must participate in regular training, risk assessments, and policy reviews to ensure continuous improvement. By embedding safeguarding in every operation, BMS fosters a culture of accountability, respect, and dignity. Together, BMS uphold ethical integrity, build trust in vulnerable communities, and advance sustainable development without compromise.


28.02.2026
Mrs. Beauty Khatun
Chairman
Bakultali Mahila Sangshad(BMS)
Bhurungamari, Kurigram.



ANNEX – 1: Terms and Definitions

Bullying: Bullying can be defined as intentional and aggressive behavior occurring repeatedly against a victim where there is a real or perceived power imbalance, and where the victim feels vulnerable and powerless to defend himself or herself (United Nations, 2016).

Child: All Persons up to the age of 18 (eighteen) years shall be regarded as children (Government of Bangladesh, 2013).

Code of Conduct: A code of conduct is a common set of principles or standards that a group of agencies or organizations have agreed to abide by while providing assistance in response to complex emergencies or natural disasters (Inter-Agency Standing Committee, 2021).

Complaint Mechanism: A complaint mechanism is any procedure that will address individual factual circumstances of human rights violations (The Advocates for Human Rights, 2014).

Confidentiality: Means not disclosing any information at any time to any party without the informed consent of the GBV survivor (Inter-Agency Standing Committee, 2021).

Consent: Consent is to make an informed choice to agree freely and voluntarily to do something (Inter-Agency Standing Committee, 2021).

Do No Harm: means avoiding exposing people to additional risks through our actions (UNICEF, 2025).

Emotional / Psychological Abuse: Emotional / Psychological abuse involves words or acts that Harm a person's emotional, intellectual, mental or psychological well-being or development. This may occur as an isolated event or repeatedly (UNICEF, 1989).

Harassment: Harassment is any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment (FAO, 2015).

Human Trafficking: Human trafficking is define as an act where the selling, buying, recruitment, receipt, transportation, transfer, or harboring of any person for the purpose of sexual-exploitation, labor-exploitation or any other form of exploitation whether in or outside of Bangladesh by means of (a) threat or use of force or other forms of coercion, or (b) abduction, fraud or deception, or of the abuse of any person's socio-economic, environmental or other types of vulnerability, or (c) of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person (Ministry of Women and Children Affairs, 2013).

Legal Assistance: Legal assistance refers to the support provided to individuals or groups in navigating legal matters, ensuring their rights are protected. It can encompass advice, representation and advocacy (UNESCO, n.d.).



Perpetrator: A perpetrator is a person, group or institution that directly inflicts, supports and condones violence or other abuse against a person or a group of people. Perpetrators are in a position of real or perceived power, decision-making and/or authority and can thus exert control over their victims. (Inter-Agency Standing Committee, 2021).

Physical Abuse: Any act or conduct which is of such a nature as to cause bodily pain, harm, or danger to life, limb, or health or impair the health or development of the victim and includes assault, criminal intimidation and criminal force (Ministry of Women and Children Affairs, 2010).

PSEAH: This term is used to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel (Inter-Agency Standing Committee, 2021).

Referral Pathway: Referral Pathway is a structured system that outlines how survivors of gender-based violence (GBV) or sexual exploitation and abuse (SEA) can be safely referred to appropriate services, including medical care, psychosocial support, legal assistance, and protection.

Retaliation: Retaliation means any direct or indirect detrimental action that adversely affects one's employment or working conditions, where such action has been recommended, threatened or taken for the purpose of punishing, intimidating or injuring him/her because he/she engaged in a protected activity (United Nations, n.d.).

Survivor: refers to a person who is, or has been, exploited or abused, including through Sexual Exploitation or Abuse. 'Victim' is a term often used in the legal and medical sectors, while the term 'survivor' is generally preferred in the psychological and social support sectors because it implies resiliency (UNICEF, 2025).

Violence: The intentional use of physical force or power threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation (World Health Organization, 2002).

Whistleblower: Whistleblower refers to a staff member or associated personnel who reports, in good faith, misconduct, wrongdoing, or violations of regulations and rules, including fraud, corruption, sexual exploitation, harassment, or abuse.

Zero Tolerance: Zero tolerance refers to the principle that every allegation is taken seriously and acted upon in line with organization's established procedures for responding to safeguarding concerns as outlined in Policy (Save the Children, 2024).


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