

BAKULTALI MAHILA SANGSHAD



**PROTECTION FROM SEXUAL
EXPLOITATION, ABUSE, AND
HARASSMENT (PSEAH) POLICY**



1. INTRODUCTION

Bakultali Mahila Sangshad(BMS) is a women-led, community-based organization dedicated to advancing gender equality, social justice, and the rights and well-being of women, children, persons with disabilities, and other vulnerable groups. In fulfilling its mission, BMS is committed to ensuring that all its programs, services, and workplaces are safe, respectful, inclusive, and free from sexual exploitation, abuse, and harassment (SEAH). Moreover, SEAH constitutes serious violations of human rights and are incompatible with the values, principles, and objectives of BMS. Such acts undermine dignity, trust, equality, and protection, particularly for women and children, and erode the accountability and credibility of development and humanitarian action. BMS therefore adopts a zero-tolerance approach toward all forms of SEAH.

This PSEAH Policy is developed in alignment with internationally recognized human rights instruments, humanitarian and development standards, donor safeguarding requirements, and the national laws and legal directives of Bangladesh. These include:

- I. The Universal Declaration of Human Rights (UDHR)
- II. The Convention on the Rights of the Child (CRC)
- III. The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- IV. The Convention on the Rights of Persons with Disabilities (CRPD)
- V. ILO Convention No. 190
- VI. ILO Recommendation No. 206 on violence and harassment in the world of work
- VII. The UN Secretary-General's Bulletin on protection from sexual exploitation and abuse
- VIII. UNICEF safeguarding and PSEA policies
- IX. UN Women safeguarding and PSEA policies
- X. The Core Humanitarian Standards (CHS)
- XI. The Inter-Agency Standing Committee (IASC) PSEA Guideline
- XII. The Minimum Operating Standards for PSEA (MOS-PSEA)
- XIII. Safeguarding frameworks of BMZ, EU Humanitarian Aid, FCDO, USAID, DAC, and other international partners.

The policy is also informed by national laws and regulations such as -

- I. The Constitution of Bangladesh
- II. The Bangladesh Labour Act, 2006 and Labour Rules, 2015 (amended 2022)
- III. High Court Directives on Sexual Harassment (2009)
- IV. The Penal Code, 1860
- V. The Women and Children Repression Prevention Act, 2000
- VI. The Prevention and Suppression of Human Trafficking Act, 2012
- VII. The Marriage Restraint Act, 2017 and
- VIII. Relevant safeguarding, child protection, and PSEAH policies of national and international organizations operating in Bangladesh.



This policy applies to all BMS board members, management, staff, volunteers, consultants, interns, partners, contractors, program participants and any individuals representing or associated with BMS, regardless of their role or contractual status.

1.1 Purpose of the Policy

The purpose of this PSEAH Policy is to institutionalize BMS's commitment to preventing and responding to SEAH in a manner that is survivor-centered, right-based, gender-responsive, and compliant with international and national standards. Specifically, this policy aims to:

- I. Prevent all forms of SEAH against program participants, staff, volunteers, partners, and community members in all BMS programs and operations.
- II. Establish clear standards of conduct consistent with international human rights conventions, humanitarian principles, and the laws of Bangladesh.
- III. Promote a safe, inclusive, and respectful organizational culture that upholds dignity, equality, non-discrimination, and protection, particularly for women, children, and persons with disabilities.
- IV. Define roles, responsibilities, and accountability mechanisms to ensure compliance with PSEAH obligations across all levels of BMS.
- V. Ensure accessible, confidential, and safe reporting mechanisms for SEAH concerns.
- VI. Provide a clear framework for timely, ethical, and survivor-centered response to SEAH allegations, prioritizing safety, confidentiality, and protection from retaliation.
- VII. Strengthen organizational capacity through awareness, prevention, and risk mitigation measures aligned with donor and partner safeguarding standards.

2. PSEAH Policy Statement

BMS affirms the following policy statements to guide all organizational actions, decisions, and behaviors. These statements reflect BMS's zero-tolerance commitment to PSEAH.

- I. BMS maintains a zero-tolerance policy toward all forms of SEAH. Any proven act of SEAH constitutes serious misconduct, resulting in immediate disciplinary action up to and including termination of employment, volunteer association, or partnership, and referral to relevant Bangladeshi authorities for legal action as required by law.
- II. BMS is committed to upholding the dignity, safety, and fundamental human rights of all individuals, regardless of religion, gender, ethnicity, caste, creed, race, age, disability, or any other status. This commitment extends to staff, beneficiaries, partners, and communities served.
- III. All responses to SEAH allegations shall prioritize the safety, dignity, well-being, and wishes of the survivor or affected person. BMS ensures confidentiality, informed consent, non-discrimination, respect for wishes, and protection from retaliation throughout reporting, investigation, and support processes.
- IV. BMS strictly prohibits all forms of sexual activity or relationships with children (persons under 18 years of age), regardless of the age of consent or perceived maturity. Enhanced safeguarding measures are mandatory for women, children, persons with disabilities, elderly individuals, and other vulnerable groups.
- V. BMS prohibits any abuse of power, trust, or authority for sexual purposes, including but not limited to: workplace sexual harassment; transactional sex or exchange of aid, goods, services, or



favors for sexual acts; coercion; exploitation of vulnerability; trafficking; or any degrading, humiliating, or abusive behavior.

- VI. All BMS representatives including staff, volunteers, board members, partners, contractors, and affiliates share collective responsibility for preventing SEAH, upholding this policy, the BMS Code of Conduct, and relevant national and international safeguarding standards. BMS commits to mandatory ongoing training, risk assessments and mitigation, partner due diligence and compliance, community awareness-raising, safe reporting mechanisms, and regular policy reviews with stakeholder input.

3. Scope of Applications

This PSEAH Policy applies to all individuals and entities associated with BMS, regardless of role, status, or duration of engagement.

- i. This policy applies to BMS board members, management, staff, volunteers, interns, consultants, contractors, service providers, partners, program participants and any individuals representing BMS.
- ii. This policy applies to conduct occurring in BMS offices, project sites, communities, during fieldwork, travel, training, events, and in online or digital spaces, whether during or outside working hours, when linked to BMS activities.

4. Definition of Key Terminologies

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 program, 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).

Protection from Sexual Exploitation, Abuse and Sexual Harassment (PSEAH): PSEAH refers to the comprehensive measures, policies, and proactive actions that humanitarian and development



organizations take to prevent and respond to sexual misconduct committed by their staff, partners, and associated personnel.

5. Core Principles

BMS is committed to creating a safe, respectful, and inclusive environment for all beneficiaries, staff, volunteers, and partners. These principles are fully aligned with the IASC PSEA standards and reflect BMS's zero-tolerance stance, adherence to international and national safeguarding frameworks, and commitment to protecting the rights, dignity, and well-being of all individuals, particularly women, children, and other vulnerable groups.

- I. BMS does not tolerate any form of sexual exploitation or abuse. Such acts constitute serious misconduct and will result in disciplinary and/or legal action.
- II. Sexual activity with a child (any person under 18 years of age) is prohibited, regardless of consent or local customs. Mistaken belief about a child's age is not a defense.
- III. The exchange of money, employment, goods, services, or assistance for sex, including favors or any form of humiliating or exploitative behavior, is strictly prohibited.
- IV. Sexual relationships between BMS representatives and beneficiaries are strongly discouraged and prohibited where there is an imbalance of power, as such relationships undermine trust and may be exploitative.
- V. BMS representatives are required to report any concerns, suspicions, or allegations of sexual exploitation or abuse through designated reporting mechanisms.
- VI. All BMS representatives share responsibility for creating and maintaining an environment that prevents sexual exploitation and abuse and promotes dignity, respect, and safety.

6. PSEAH Implementation Framework

BMS is committed to implementing the Prevention of PSEAH policy in a systematic, practical, and sustainable manner. This Implementation Framework outlines the key measures through which BMS integrates safeguarding into its governance, programs, human resources, partnerships, and community engagement. The framework ensures accountability, survivor-centered responses, and continuous improvement in line with international standards and national legal obligations.

6.1 Integration of SEAH into Planning, Programming and Operational Processes

BMS ensures that the prevention of SEAH is systematically integrated into all aspects of organizational planning, programming, and operational processes. Moreover, safeguarding and PSEAH considerations are incorporated in all phases of the Project Cycle Management (PCM) including program design, implementation, monitoring, and evaluation to ensure that all activities are conducted safely, ethically, and in line with national and international standards. Key elements include:

- 6.1.1 **Appointment of PSEAH Focal:** BMS designates a PSEAH Focal Point at the organizational level to coordinate, monitor, and support implementation of the PSEAH policy across all programs and operations. Additionally, BMS assigns clearly defined PSEAH responsibilities to



designated staff at the project level, allocating dedicated time and resources to ensure effective day-to-day safeguarding in field operations.

- 6.1.2 **Risk Assessment:** BMS conducts comprehensive PSEAH risk assessments for all programs, activities, and operational settings to identify potential vulnerabilities for beneficiaries, staff, and communities, with particular attention to women, children, persons with disabilities, and other marginalized groups.
- 6.1.3 **Safeguarding Measures:** Based on risk assessment findings, BMS integrates appropriate safeguarding measures into program plans, operational procedures, and field activities to prevent harm and protect beneficiaries.
- 6.1.4 **Monitoring and Accountability:** Compliance with PSEAH measures is monitored throughout program implementation. Regular reviews ensure alignment with international standards, donor requirements, and national laws.
- 6.1.5 **Ethical Programming:** All planning and operational decisions are guided by ethical principles to protect the dignity, rights, and safety of beneficiaries and communities, ensuring programming does not inadvertently increase risk or exploit vulnerabilities.
- 6.1.6 **Dedicated Budget:** BMS allocates a specific budget to PSEAH activities to ensure adequate resources for training, awareness campaigns, reporting systems, investigations, survivor support, monitoring, and other safeguarding measures. This ensures that safeguarding is effectively implemented, maintained, and continuously improved across all programs and operations.
- 6.1.7 **Continuous Learning:** Lessons learned from risk assessments, incident reports, and monitoring activities are used to strengthen organizational procedures, improve operational practices, and reinforce a culture of safeguarding.

BMS's approach ensures that PSEAH is fully integrated, adequately resourced, and operationalized as a core component of responsible programming, staff accountability, and organizational governance.

6.2 Safe Recruitment

To embed safeguarding throughout the recruitment lifecycle, BMS shall implement the following procedures:

- 6.2.1 **Job Announcement:** All BMS job announcements include a standard paragraph clearly stating the organization's Zero-Tolerance Policy regarding SEAH. This communicates expectations to all prospective candidates from the outset.
- 6.2.2 **Vetting:** BMS systematically vets all prospective job candidates using established screening procedures to ensure the organization does not hire individuals who may pose a risk to staff, beneficiaries, or communities. This includes reference checks, criminal background verification (where applicable), and evaluation of past conduct related to SEAH.
- 6.2.3 **Self-Declaration:** Selected candidates are required to sign a Self-Declaration Form affirming that they have not committed SEAH in the past and committing not to commit any form of sexual exploitation, abuse, or harassment in their role with BMS.
- 6.2.4 **Alignment with HR Processes:** All BMS HR processes, including recruitment, induction, performance management, and disciplinary procedures, are aligned with the PSEA policy. This includes clearly describing the reporting and response mechanisms for SEAH allegations and specifying disciplinary measures for substantiated cases.
- 6.2.5 Apply equitable recruitment practices consistent with the Bangladesh Labour Act.



6.3 Partnership and Third-party Agreement

All partnership agreements, sub-agreements, contracts for services, and supply agreements will include explicit and legally binding clauses that:

- 6.3.1 All contracts, Memoranda of Understanding (MoUs), partnership agreements, and service contracts include explicit and enforceable PSEAH clauses, reflecting zero tolerance for SEAH.
- 6.3.2 PSEAH requirements apply equally to implementing partners, contractors, consultants, volunteers, interns, vendors, suppliers, service providers, and any third parties acting on behalf of or associated with BMS.
- 6.3.3 Partners are required to ensure that their personnel receive regular training on PSEAH and safeguarding, understand their roles and responsibilities, and are subject to clear accountability and disciplinary procedures for violations.
- 6.3.4 BMS conducts safeguarding due diligence prior to entering into partnerships and carries out periodic monitoring and reviews to assess partner compliance with PSEAH commitments throughout the partnership period.
- 6.3.5 Non-compliance with PSEAH requirements may result in corrective measures, suspension, or termination of the partnership, in addition to referral to relevant authorities where required by law.

6.4 Staff's Capacity Building

BMS is committed to the continuous professional development of its staff in safeguarding. This includes:

- 6.4.1 Provide orientation for staff, volunteers, and partners on PSEAH, child safeguarding, ethical conduct, and safe reporting.
- 6.4.2 Organize Periodic refresher training on PSEAH, child safeguarding, ethical conduct, and safe reporting.
- 6.4.3 Promote awareness of international conventions, donor safeguarding frameworks, and Bangladesh laws relevant to SEAH.
- 6.4.4 Build capacity for identifying risks, responding appropriately to incidents, and applying a survivor-centered approach.

6.5 Data Protection & Confidentiality

BMS is committed to upholding the highest standards of data protection and confidentiality in all matters related to SEAH. BMS will implement the following procedures to ensure data protection and confidentiality:

- 6.5.1 **Limited Access:** Access to SEAH-related data shall be strictly limited to authorized personnel who require such information to perform their official duties, including PSEAH Focal Points, investigators, and Human Resources personnel involved in disciplinary processes.
- 6.5.2 **Secure Storage:** All physical documents will be stored in locked cabinets in secure locations. Digital data will be stored on secure, password-protected systems with encryption, access logs, and regular backups.
- 6.5.3 **Secure Transmission:** When transmitting sensitive data, secure methods such as encrypted email, secure file transfer protocols will be used to prevent unauthorized interception.



- 6.5.4 **Anonymization and Aggregation:** Where possible and appropriate, data will be anonymized or aggregated for reporting, learning, and monitoring purposes to protect individual identities.
- 6.5.5 **Data Retention:** SEAH-related data will be retained only for as long as necessary to fulfill legal, investigative, and organizational requirements. Secure destruction methods will be used for disposal.

6.6 Reporting Mechanisms

BMS has established safe, confidential, and accessible mechanisms for personnel, beneficiaries, and community members, including children and other vulnerable groups, to report any incidents or suspicions of SEAH. BMS reporting mechanisms for PSEAH adhere to the core principles of effective reporting, ensuring safe, confidential, and accessible processes for all stakeholders.

6.6.1 Notification

- 6.6.1.1 Staff and personnel likely to receive complaints are trained in how to handle allegations, documentation, and initial response procedures.
- 6.6.1.2 Reports are promptly notified to designated PSEAH focal points for action, investigation, or referral.

6.6.2 Protection from Retaliation

- 6.6.2.1 BMS maintains a culture of transparency and safety, ensuring that anyone reporting SEAH concerns or participating in investigations is protected from retaliation or punitive actions.
- 6.6.2.2 Any threats, intimidation, or adverse action against complainants, survivors, or witnesses are strictly prohibited.
- 6.6.2.3 Safe and confidential procedures exist for reporting any consideration of retaliation.

6.6.3 Documentation and Information Sharing

- 6.6.3.1 BMS restricts access to all written and digital reports to protect the security and privacy of survivors, complainants, and witnesses.
- 6.6.3.2 Information about allegations is only shared on a need-to-know basis for investigations, case management, or survivor assistance.
- 6.6.3.3 Detailed descriptions of reporting mechanisms, procedures to review SEAH allegations, and information-sharing protocols are provided in separate procedural documents.

6.7 Awareness Raising

- 6.7.1 Conduct regular awareness campaigns for staff, partners, beneficiaries, and communities about PSEAH standards, rights, responsibilities, and safe reporting mechanisms.
- 6.7.2 Promote understanding of zero-tolerance policy and reinforce the organizational culture of respect, protection, and accountability.
- 6.7.3 Utilize multiple approaches, including community meetings, posters, workshops, and digital communications to reach diverse audiences.



6.8 Investigations

- 6.8.1 Treat all allegations of SEAH with seriousness, impartiality, and confidentiality.
- 6.8.2 Conduct investigations promptly, fairly, and in accordance with due process.
- 6.8.3 Protect survivors, witnesses, and staff involved in the investigation from intimidation or retaliation.
- 6.8.4 Ensure findings inform organizational learning, policy updates, and risk mitigation strategies.

6.9 Support to SEAH Survivors

- 6.9.1 Provide timely and survivor-centered support, including medical care, psychosocial counseling, legal assistance, and referrals.
- 6.9.2 Ensuring responses respect the survivor's informed consent, choices, privacy, and dignity.
- 6.9.3 Implement measures to prevent further harm and traumatization.
- 6.9.4 Coordinate with relevant authorities, service providers, and partner organizations for comprehensive support.

6.10 Disciplinary Actions

- 6.10.1 Apply fair, consistent, and proportionate disciplinary measures for confirmed PSEAH violations.
- 6.10.2 Possible actions include termination, legal referral, contract termination, or corrective actions.
- 6.10.3 Ensure accountabilities for all individuals associated with BMS, including staff, volunteers, interns, consultants, contractors, and partners.
- 6.10.4 Integrate lessons learned from disciplinary cases into risk assessments, staff training, and organizational improvement.

7. Accountability

BMS is committed to ensuring accountability at all levels of the organization for the PSEAH. Accountability measures are integrated into program design, operational processes, management oversight, and reporting systems to ensure that safeguarding commitments are effectively implemented and continuously monitored.

7.1 PSEAH Risk Assessment and Mitigation

- 7.1.1 BMS conducts regular risk assessments to identify potential PSEAH vulnerabilities within programs, operations, and organizational processes.
- 7.1.2 Identified risks are analyzed, prioritized, and addressed through appropriate mitigation measures, including the integration of safeguarding procedures, staff training, and community awareness initiatives.
- 7.1.3 Risk assessments consider all stakeholders, including staff, volunteers, partners, beneficiaries, and particularly vulnerable populations such as women, children, and persons with disabilities.
- 7.1.4 Risk mitigation measures are documented, monitored, and reviewed regularly, with lessons learned applied to strengthen programs and operational practices.



- 7.1.5 Resources, including a dedicated budget, are allocated to implement risk mitigation measures effectively.

7.2 Accountability of Management

- 7.2.1 BMS management is responsible for ensuring organizational adherence to the PSEAH policy and safeguarding standards.
- 7.2.2 Managers at all levels are required to actively oversee the implementation of PSEAH measures in their areas of responsibility, including recruitment, programming, partnerships, reporting, and investigations.
- 7.2.3 Management ensures that staff, volunteers, and partners understand their responsibilities, receive proper training, and comply with safeguarding procedures.
- 7.2.4 Regular reporting on PSEAH implementation, risk mitigation, and incidents is provided to senior management to maintain transparency, continuous improvement, and organizational learning.
- 7.2.5 Managers are accountable for addressing failures or gaps in implementation promptly, taking corrective action, and fostering a culture of ethical conduct and protection.

8. Governance and Learning

BMS is committed to strong governance, accountability, and continuous organizational learning to prevent and respond to SEAH. Effective governance structures, clearly defined roles and responsibilities, and systematic learning mechanisms are essential to ensure a safe, respectful, and rights-based environment for staff, representatives, partners, and community members. BMS adopts a zero-tolerance approach to all forms of sexual exploitation, abuse, and harassment and ensures that PSEAH responsibilities are embedded at all levels of governance and management.

8.1 Roles and Responsibilities

Clear roles and responsibilities are essential to ensure effective oversight, implementation, and accountability of this Policy.

8.1.1 Executive Committee / Governing Body

The Executive Committee (EC) of BMS holds the ultimate responsibility for safeguarding and PSEAH oversight. The EC shall:

- 8.1.1.1 Ensure that all staff are informed about and receive training on the PSEAH policy.
- 8.1.1.2 Take measures to prevent, monitor, receive, and investigate cases of PSEAH.
- 8.1.1.3 Ensure sufficient financial, human, and institutional resources are allocated to effectively implement PSEAH.
- 8.1.1.4 Conduct an annual Safeguarding Audit to identify and address gaps in policy implementation.
- 8.1.1.5 Integrate PSEAH considerations into the organization's strategic planning and risk management processes.
- 8.1.1.6 Promote an organizational culture of accountability, transparency, and zero tolerance for sexual exploitation, abuse, and harassment.



8.1.2 Senior Management Team

The Senior Management Team is responsible for translating the PSEAH Policy into practice across all programs and operations. The SMT shall:

- 8.1.2.1 Ensure organization-wide implementation, internalization, and enforcement of the PSEAH Policy.
- 8.1.2.2 Promote a “Speak Up” culture in which staff and beneficiaries feel safe and supported to raise concerns.
- 8.1.2.3 Oversee the integration of vetting and background checks in HR processes to prevent the hiring of perpetrators.
- 8.1.2.4 Appoint qualified Safeguarding Focal Points and ensure they have the necessary authority, independence, and capacity to perform their duties effectively.

8.1.3 Managers and Supervisors

- 8.1.3.1 Ensure all PSEAH concerns and reports are addressed in a timely, confidential, and survivor-centered manner.
- 8.1.3.2 Monitor safeguarding risks and emerging trends and take appropriate corrective and preventive measures.
- 8.1.3.3 Regularly report on safeguarding performance and key risks to the Executive Committee.
- 8.1.3.4 Promote a culture of accountability, ethical behavior, and respect within their teams.

8.1.4 PSEAH Focal Points

BMS should appoint and train designated PSEAH focal point at organizational and field levels to serve as accessible reporting channels. PSEAH Focal Points shall:

- 8.1.4.1 Proactively implement the PSEAH action plan and deliver training to staff and volunteers.
- 8.1.4.2 Support the prevention of, and response to, abuse and exploitation by receiving, documenting, and appropriately forwarding concerns, as well as responding to allegations, concerns, or child and adult protection incidents.
- 8.1.4.3 Provide technical guidance to raise awareness, promote good practice, and advise managers and staff.
- 8.1.4.4 Act as confidential points of contact, provide technical support to staff, and facilitate survivor referrals.
- 8.1.4.5 Maintain anonymized records and contribute to trend analysis and organizational learning.
- 8.1.4.6 Ensure protective measures for whistleblowers and implement appropriate reporting mechanisms.

8.1.5 Staff and volunteers

All staff and volunteers shall:

- 8.1.5.1 Comply with BMS PSEAH policy, Code of Conduct, and safeguarding procedures.
- 8.1.5.2 Participate in PSEAH-related training, orientation, and awareness-raising activities.
- 8.1.5.3 Immediately report any suspected, witnessed, or disclosed PSEAH concern through designated reporting mechanisms, regardless of the alleged perpetrator's position or role.
- 8.1.5.4 Cooperate fully, honestly, and confidentially with any safeguarding or PSEAH-related inquiry, assessment, or investigation.



Respect and protect the confidentiality and dignity of survivors and avoid retaliation, victim-blaming, or the dissemination of unverified information.

8.1.6 Project Participants, Partners, Vendors and Consultants

All partners, vendors, and consultants shall:

- 8.1.6.1 Comply with BMS PSEAH standards in all activities carried out in collaboration with the organization.
- 8.1.6.2 Ensure their personnel are aware of PSEAH requirements, reporting procedures, and the consequences of non-compliance.
- 8.1.6.3 Immediately report any suspected, observed, or disclosed PSEAH concern related to BMS programs or operations through the designated reporting mechanisms.
- 8.1.6.4 Cooperate fully with any safeguarding assessments, inquiries, or investigations conducted by or on behalf of BMS.

8.2 Monitoring Framework

BMS shall implement a comprehensive monitoring framework to systematically track compliance with this Policy and assess the effectiveness of all PSEAH measures. Key monitoring mechanisms include:

- 8.2.1 **Proactive Risk Assessments:** Regular and in-depth analyses of program activities, operational contexts, and potential SEAH risks will be conducted using standardized assessment tools. These assessments will inform risk mitigation strategies and the continuous adaptation of program design and implementation to minimize SEAH vulnerabilities.
- 8.2.2 **Performance Indicator Tracking:** Key performance indicators (KPIs) will be continuously monitored. These include, but are not limited to, the coverage and effectiveness of PSEAH training, trends in reporting patterns, adherence to established response timeframes for allegations, and the timely implementation of follow-up actions and recommendations.
- 8.2.3 **Secure Data Management:** All data related to PSEAH incidents, reports, and investigations will be managed with the highest standards of security, confidentiality, and integrity. This includes strict adherence to international data protection principles and relevant national legislation to safeguard sensitive information and protect the privacy of all parties involved.

8.3 Periodic Review of Mechanisms and Policy Audits

- 8.3.1 The Executive Committee will conduct biannual reviews and audits, or sooner, if necessary, to identify and address emerging issues, such as significant changes in context, programs, or legal requirements.
- 8.3.2 Periodic internal or external policy audits will ensure continued alignment with international standards, donor requirements, and national legal frameworks.

9. Concluding Remarks

BMS reaffirms its zero-tolerance commitment to SEAH. The organization is dedicated to ensuring a safe, respectful, and inclusive environment for all beneficiaries, staff, volunteers, and partners. Through strong prevention measures, accessible reporting systems, survivor-centered responses, and clear accountability,



BMS will continue to uphold the highest safeguarding standards in all its programs and operations. All individuals associated with BMS share responsibility for implementing this policy and protecting the dignity and rights of the communities we serve.

ANNEX 1: Terms and Definitions

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

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

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)

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)

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)

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)

PSEAH Focal Point: The PSEA Focal Point is a staff member of an organization tasked with implementing PSEA in direct coordination with their Head of Office, both internally and as an active member of the PSEA Network. (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.)

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 program, 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)

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)


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