

Safeguarding Policy

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Centre for Injury Prevention and Research, Bangladesh (CIPRB)

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1. Introduction to CIPRB

The Centre for Injury Prevention and Research, Bangladesh (CIPRB) is a world leading injury prevention organisation, based in Bangladesh since 2005. Through pioneering research and innovation, CIPRB saves lives by delivering quality programmes throughout Bangladesh, designed to combat injury-based fatalities and morbidity.

CIPRB Vision: Every person living injury-free, healthy, dignified, quality life and contributing in productivity.

CIPRB Mission: Ensure health and safety through knowledge and skill transfer, creating evidences, services, adopting technologies and advocacy.

CIPRB as an organisation expects the highest standards of behaviour and professional practice in all its work and engagement with people. This is particularly important when our work brings us in contact with children, vulnerable adults and the community at large. CIPRB has developed a high standard of risk appraisal for its various programmes to ensure safe and enabling environment for children and other beneficiaries. These are set out in a series of Standard Operating Procedures.

CIPRB firmly believes that:

- · The welfare of the child and vulnerable adults is paramount
- All children and vulnerable adults have the right to protection from abuse regardless of gender, age, race, disability, sexuality or beliefs
- People should be treated equally and enabled to access services which meet their needs without feeling discriminated against
- We must take positive action to promote safe practices and protect children and vulnerable adults from all forms of harm, abuse, neglect and exploitation

Safeguarding Policy

CIPRB safeguarding policy relates to children, vulnerable adults and everyone the organisation comes into contact within the course of its work. In CIPRB we have zero-tolerance for all forms of abuse, sexual abuse and exploitation, sexual harassment, bullying and all forms of discrimination. CIPRB will not tolerate abuse and exploitation by staff, partners or any associated personnel.

While much of this policy refers to the protection of children, its principles and approaches will be adapted according to context and degrees of vulnerability in the case of adults.

CIPRB will ensure that every person, who directly or indirectly comes into contact with children and vulnerable adults, is mindful of the need for their protection, and knows how to protect people effectively with the principle of Do No Harm as the central guide.

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Why is a Safeguarding Policy needed?

- i. The Legal Basis: Bangladesh adopted the Children's Act in 1974 and later its amendment in 2013, which guides the efforts for ensuring welfare of children in the country. In 1990, Bangladesh ratified the United Nations Convention on the Rights of the Child, which provides a comprehensive framework for the protection, provision and participation of all children. This places legal obligations and responsibilities on individuals and organisations to protect children from harm and abuse. CIPRB will ensure these responsibilities and obligations are upheld and discharged. For more information on legislative provisions, refer to annexure 5.
- ii. The Moral Basis: CIPRB works with children who are vulnerable to injuries and other hazards like nutritional deficiency, illnesses, drowning etc. Experience shows that other hazards include all kinds of abuse and exploitation of children. CIPRB acknowledges its moral responsibility to ensure a safe and protected space for these children.
- iii. Prevention: The awareness, training and knowledge sharing among the staff, volunteers, consultants and visitors about the rules, regulations and code of conduct of the organisation for the protection and well-being of children and vulnerable adults, will lower the risk of children being exposed to abuse and exploitation.
- iv. Professional Reputation: Organisations working with children and coming into contact with vulnerable adults require having safeguarding policies and procedures to avoid false and malicious accusations of abuse. Such allegations, whether proven or not following investigation, can destroy the reputation of the organisation that may lead to withdrawal of funding or new collaborations. CIPRB will strive to create an environment and work culture where safeguarding values and safety of children, vulnerable adults in communities, staff, partners and associates is central.

CIPRB Statement of Commitment for Safeguarding of Children and Vulnerable Adults

The safeguarding policy of CIPRB is a statement of our commitment to ensure and promote safety and welfare of children and vulnerable adults above all. We recognise that vulnerability is not necessarily fixed, and any child or adult can become vulnerable in a given context, reaffirming the need for CIPRB to be vigilant at all times.

In CIPRB we recognise that abuse is a global phenomenon and it occurs in all societies and countries. Implementation of the safeguarding policy will oblige the staff, volunteers, researchers, interns, government officials and others working on behalf of the organisation to acknowledge, ensure, prioritise and safeguard the best interest of children and protect adults under any given circumstances. The policy will also guide the organisational efforts to spread awareness in the community and promote preventive measures for safeguarding children and vulnerable adults.

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Definitions endorsed by CIPRB

The definitions below are drawn from the wealth or material available in the arena of child protection and safeguarding, but in many cases apply to vulnerable adults.

- i. Child: The UNCRC and the Constitution of Bangladesh both define a child as a person under the age of 18 years. Thus, the organisation identifies all under 18 years as children.
- ii. Child Abuse/ harm: According to the World health Organisation "child abuse" and "maltreatment" is 'all forms of physical and/ emotional ill-treatment, sexual abuse, neglect or negligence treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.'
- iii. Child Protection: Child Protection constitutes actions and measures taken for protecting a child who is exposed or likely to be exposed to a significant harm, due to violence, abuse or neglect.
- iv. Child Safeguarding: Child Safeguarding is a holistic approach to ensure the protection of a child from intentional or unintentional harm or abuse, prevention from any possible violence, intentional or unintentional harm or abuse and promoting a safe environment for a child's wellbeing.
- v. Vulnerable Adults: CIPRB comes in contact with many adults in the community whose social, economic or physical vulnerabilities make them more prone to abuse / exploitation than others. Any such individuals who are exposed to violence, harm, abuse, or are in need of support due to mental health problems and/or learning or physical disability which puts them in additional risk, will be identified as a vulnerable adult.
 - In other words, a vulnerable adult is any person aged 18 or over who is or may be in need of care and support (e.g. health care, relevant personal care or social care) and is experiencing or is at risk of abuse or neglect and, as a result of this, is unable to protect themselves from either the risk or experience of neglect or abuse.
- vi. **Best Interest of children:** Any decision that affects children should be made based on consideration of their physical, mental and psychological well-being and the need to prevent any harm to them or other children. A child's views and opinions must be given due consideration in accordance with their age and understanding while assessing the best interest of a child.
- vii. Physical abuse: Physical abuse/harm includes all forms of actual or possible physical harm, whether intentional or not. Physical abuse can include hitting, corporal punishment, drowning, burning, strangling and poisoning.

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- viii. Sexual Abuse: All forms of sexual activities that involve a child who cannot comprehend or is not developmentally prepared for or unable to give informed consent, are considered sexual abuse. Any direct sexual contact with a child that incudes kissing, touching, penetration or encouraging the child to witness pornography, adult sexual activities inappropriate for a child or intercourse can be identified as sexual abuse. Trafficking, commercial sexual exploitation, prostitution and grooming with harmful intention are also forms of child abuse.
- ix. Emotional abuse/ mental abuse: This includes any form of persistent mental pressure or failure to provide adequate emotional support based on the needs of a child, through repeatedly ignoring or rejecting, isolating from social contact, degrading or humiliating.
- x. Neglect: Depriving a child of his/her necessities when there is the means to do so, to the extent that the deprivation can cause long term impairment to the child's physical health or intellectual or mental development, is considered as neglect.
- xi. **Exploitation**: it is defined as "action or fact of treating someone unfairly in order to benefit from their work." Use of a child or a vulnerable adult for commercial or financial gain can be identified as exploitation.
- xii. Modern Slavery: Encompasses slavery, human trafficking, forced labour and domestic servitude.

Who does the safeguarding policy apply to?

The policy is applicable to:

- 1. All Trustees and board members
- 2. All staff including senior management members and other employees (field as well as headquarters) working in the organisation
- 3. All paid volunteers working in the organization in different programmes / projects i.e. Anchal Mas, Lifeguards, Community Swim Instructors, school education instructors, reproductive and child health and road safety team members, Bagan Shebika (midwives working in tea garden projects) and others.
- 4. Interns, researchers and unpaid volunteers
- All the visitors who will visit programmes of CIPRB, such as government officials, journalists, partner organisations, donors, vendors, supporters and other stakeholders
- 6. All the trainers, consultants etc. who are acting on behalf of CIPRB

CIPRB staff, volunteers and associates are expected to have orientation and knowledge on the safeguarding policy for children and vulnerable adults and the code of conduct, before joining in their work areas. The contract of employment also contains the safeguarding policy, code of conduct and the statement of commitment to be signed by staff.

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To visit projects and centres, all individuals must be familiar with the Safeguarding policy and procedures. The visitors are expected to read and sign a statement of commitment to adhere to CIPRB's principles and policies before going to any of its projects / centres, where they can directly or indirectly come into contact with children and vulnerable adults.

This policy will be reviewed annually and signed off by the CIPRB Board.

Values and Principles

Values of CIPRB

- Integrity: CIPRB believes in being an honest and truthful organisation. All
 employees and associates are expected to be righteous, responsible and accountable
 for their words and actions.
- ii. Innovation: It encourages everyone to be creative and try new approaches to find solutions or for programme development in the organisation. A research-based, scientific approach is encouraged.
- iii. Equality & Equity: CIPRB will treat every individual associated with the organisation as an equal human being, irrespective of age, gender, religion and socioeconomic background. It also believes in providing support or opportunities to all employees and associates to grow and succeed (equity).
- iv. Diversity & Inclusiveness: CIPRB believes that each individual is unique, and recognises his/her individual differences. It promotes diversity by embracing inclusive-approach and creating safe work space where diversity is protected and promoted. It believes that underprivileged groups need special attention to improve their quality of life.
- v. Excellence: CIPRB strives to achieve excellence and quality in everything it does. It believes that its work can have national, regional and international influence.

Core Principles for Safeguarding

- Child Rights Based Approach: The organisation shall be obliged to respect the rights and dignity of the children, as mentioned in the Constitution of Bangladesh and UN Convention on the Rights of the Child.
- ii. Ensure safety: The organisation shall ensure safe and friendly environment for the children and vulnerable adults which facilitates learning and growth.
- iii. Confidentiality: The organisation shall uphold the confidentiality and privacy of all children and vulnerable adults.

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- iv. Consent: The organisation shall disclose the facts and information to the children, parents and community to obtain their consent to access and/or use information related to them.
- v. Participation: The organisation shall ensure and promote the participation of children in accordance with their age and understanding and provide all reasonable platforms for them to voice their concerns, opinions and suggestions. Similarly, participation of their families, community members and other stakeholders shall also be encouraged through events, discourses and their involvement in ensuring child safeguarding.
- vi. Respect and Fair Treatment: The organisation shall ensure equal rights and fair treatment to all the children and adults irrespective of gender, religion, sexual orientation, disability, language, economic or social background.
- vii. Accountability and Transparency: The organisation shall promote and ensure transparency and accountability by developing a culture where concerns can be raised openly and without fear, which will help to prevent and protect children and adults from any harm.
- viii. Best services: CIPRB is committed to provide best care and services to children through quality, sensitive and skilled staff and enabling learning environment.
- ix. Presumption of innocence: Until found otherwise, a child will always be considered innocent and to be telling the truth. In case of any allegation against a child, CIPRB will treat the child with dignity and respect and will protect him/ her from any humiliation or hostility. Similarly, children's concerns or complaints will not be dismissed and instead will be given due importance and the matter will be looked into.

Composition and role of Safeguarding Committee

Safeguarding Committee also known as Safeguarding Team will be constituted in CIPRB head office which will comprise 7-10 key senior management team members. A board member will also be designated as a member of this committee and will attend meetings at regular intervals.

Members:

- i. Directors and representatives from HR/Admin, Finance, Programme teams
- ii. Executive Director
- iii. A Board member (on a revolving basis, each for six months)

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Meetings:

- a. The Safeguarding team will have general meetings at least once every quarter to discuss key safeguarding issues and any cases that may have arrived during the period.
- b. Additionally, this team will hold meetings as and when any case related to safeguarding arises in the organisation.
- c. The designated board member will also join the meetings to get updates.

Safeguarding Champions: CIPRB will nominate from among its staff / representatives, safeguarding champions who will lead, guide and report issues related to safeguarding in the field and head office. These champions will closely work with the safeguarding team and will ensure that the preventive measures are taken and help in investigation to take corrective actions in case of a breach of the safeguarding policy and procedures. At least one safeguarding champion will be at each field office and 1-2 in the head office.

Guidelines for constitution of fact-finding/investigation team:

- The fact-finding team members should be neutral and not closely affiliated with the accused.
- ii. In case of the victim being a girl/ woman, the fact-finding team must have at least one female member.

2. Code of conduct

It is important for all associated with CIPRB to ensure that they exhibit appropriate behaviour around children and when engaging with vulnerable adults. This should be done in a way that reflects CIPRB's commitment to create enabling and safe environment for all. CIPRB expects that all its employees, visitors and associates will comply with the behaviour code of conduct. This code of conduct will be prominently displayed in CIPRB's head office, field offices and will be shared with all organisation representatives. Non-compliance will result in disciplinary action as described in section 3.3 and Annex 2.3.

It should be noted that whilst CIPRB respects the right of staff, partners and associates to private life, it wishes to make very clear that it does not expect the safeguarding policy and procedures to be violated inside or outside of work. Following from that, the code of conduct is to be upheld inside and outside of the workplace.

CIPRB has zero-tolerance to any harm or abuse. The following behaviour is not acceptable:

- 1. Abuse (sexual, physical, verbal or psychological) of children and vulnerable adults
- 2. Violence against children and vulnerable adults
- 3. Discrimination against children and vulnerable adults based on gender, race, ethnicity, religion, disability, caste, creed, nationality or any other ground
- 4. Blackmailing or threatening children, vulnerable adults, parents, guardians and carers

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- 5. Promoting/ supporting child marriage in beneficiary communities or engaging in/ promoting the same in personal life
- 6. Employing children at workspaces or at home
- 7. Misuse of confidential information related to children or sharing the same with unauthorised person
- 8. Being complicit in the cover-up of any case of child abuse or hiding any related information. This includes failing to report or manipulating any aspects of any report of child abuse
- 9. Negligence causing harm / death of the child
- 10. Financial / non-financial corruption affecting children / families of children in the process of implementing programmes for children
- 11. False allegation of child abuse or harm on fellow workers, associates or visitors

Do's and Don'ts

Do:

- a. Practice good behaviour which creates a safe and child-friendly environment
- b. Ensure children's well-being and physical safety
- c. Exhibit care, sensitivity and support towards children
- d. Appreciate, inspire and motivate children for their efforts
- e. Support children in their learning at CIPRB and in any aspect of their lives
- f. Respect everyone's opinions and especially respect children
- g. Obey the law of the land and respect the local cultures and norms; bring to notice of the Safeguarding team any such traditions/practices that harm children/ vulnerable adults
- h. Ensure a safe commute or transportation for children (with parents or responsible adult)
- i. Follow guidelines for taking care of disabled children, and encourage their inclusion and participation in programme activities
- Properly follow CIPRB's SOP guidelines (e.g. on Anchal, Swimsafe programmes, RCH, NTD, NCD, Road Safety etc.)
- k. Follow protocol for responding to emergencies or risks (as elaborated in section on protocols for handling risks)
- Take the consent of children and/or parents or caregivers/ legal guardians for taking their picture or information of a personal nature by informing them correctly about the purpose and intended use of the same

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Do not:

- a. Abuse (mental, physical, social, sexual, verbal or psychological) children
- b. Hide critical information (e.g. allergies, disability and other issues) related to children with persons responsible for taking care of them / responsible for their well-being
- c. Ask children or their parents for a bribe / favour of a financial or non-financial nature for extending CIPRB's services for children
- d. Hide or manipulate reports of child abuse / neglect
- e. Misuse the power vested in your position to manipulate or harm children
- f. Promote child labour in any form
- g. Involve children for personal work / interest
- h. Involve children in activities that can put them at physical / mental risks
- Exhibit inappropriate behaviour like touching children, displaying inappropriate content on mobile phones, using foul language or exhibiting violent / aggressive behaviour or such behaviour which is sexually indicative in any manner.
- j. Be complicit in abuse of children
- k. Discriminate on the basis of sex, colour, age, race, religion, physical / mental ability or compare children with others
- l. Ignore children's opinions, suggestions or concerns
- m. Lie to children or make false promises
- n. Involve children for political gains / interest
- o. Engage children in substance abuse or drug dealings
- p. Engage in or promote child marriage (18 years for girls and 21 years for boys)
- q. Take photos / videos without written consent
- r. Engage children in pornography, or access / store the same in children's presence
- s. Encourage children to come and receive services by CIPRB during bad weather
- t. Violate confidentiality
- u. Involve children for personal interests
- v. Involving children in any activity causing mental or physical risk. For instance, teacher insisting/ forcing children to attend class/ activities in extreme weather
- w. Promote nepotism and/or favouritism

Safeguards for vulnerable adults

In the community

- a. Identify vulnerable adults in the community and sensitise community members about their vulnerabilities and the services available to support them
- b. Include protection of vulnerable adults in the agenda for the meetings with community members like the Village Injury Prevention Committee (VIPC) / Union Injury Prevention Committee (UIPC) meetings.

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At workspaces

- a. Any vulnerable adult employed by CIPRB will have support from the supervisor / programme team / Safeguarding team for their protection from any harassment or harm
- Provide facilities / provisions to make work safe and enabling for vulnerable adults,
 e.g. making of ramps and toilets for persons with disability, providing safe transport
 facility for women in hazardous locations and after late working hours etc.

2.1 Prevention of Sexual Exploitation and Abuse (PSEA)

All CIPRB staff, partner organisations and related personnel have a duty to uphold the principles of CIPRB's 'Prevention of Sexual Exploitation and Abuse (PSEA)' code of conduct, be truthful with adults, vulnerable adults, children, youth, their families and communities participating in the organisation's programmes and events. Sexual exploitation and sexual abuse are a criminal offence and have always been unacceptable behaviour for CIPRB personnel. CIPRB has zero tolerance for any kind of sexual misconduct among CIPRB staff or related personnel. Sexual misconduct by CIPRB staff or related personnel is prohibited in all its forms, whether it occurs during or beyond working hours.

This PSEA code of conduct is intended to serve as a guide for all staff on how to uphold the ethical foundation of the organisation's views and actions. It also aims to help the staff to ensure that they protect the communities they work with and that their work does not put the people of concern at greater risk. All CIPRB staff are obliged to abide by the following PSEA code of conduct inside and outside CIPRB during their professional and personal communications.

All CIPRB staff and associates will-

- i) Not commit any act of sexual exploitation, sexual abuse or sexual violence.
- ii) Ensure that all beneficiaries are treated with respect in all forms of verbal and written
- iii) Not produce, procure, distribute or use pornographic material in CIPRB's offices or send pornographic emails.
- iv) Never directly or indirectly use an adult or a child to provide sexual services to third parties, support, facilitate or participate to any form of prostitution or sexual exploitation.

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- v) Always ensure that all audio, written or visual communication, respects the dignity and human rights of the person featured (including anonymity when necessary and for all children) and does not expose her or him to any risk of retaliation or abuse of any nature.
- vi) Never show the faces of adult or children who are exploited sexually, victim of trafficking or sexual abuse.
- vii) Will immediately report any suspicions or allegations of behaviour going against the principles of the CIPRB's PSEA code of conduct to his/her manager/supervisor, even if the information or allegation is vague and without having investigated it personally.

3. Reporting Safeguarding Incidents, Documentation and Follow-up

It is an obligation for all CIPRB associates and representatives to immediately report any concerns or allegations related to children or vulnerable adults in accordance with appropriate procedure. Failure to do so will result in disciplinary action (annexure 2.3). The Safeguarding team will immediately look into the concerns and, based on the nature and category of risk, decide the course of action. The matter will be documented in the prescribed format and stored properly.

CIPRB works in partnership with a number of agencies (partners and donors) in Bangladesh and other countries. They, too, have an obligation to ensure that the work they do is carried out with highest regard to the safeguarding and protection of children and adults, and have their own policies and reporting requirements. As appropriate, CIPRB will therefore need to report cases, our handling of them and their outcome, to our partners or donors. CIPRB will work with our partners and donors to ensure that processes, documentation and reporting of incidents is carried out in a manner that complies with partners' and donors' own requirements, without contravening the laws of Bangladesh, and ensuring that the dignity of the child or adult involved is maintained.

CIPRB is committed to rectifying any occurrence of harm and/or abuse related to children and vulnerable adults and bring relief to the victims. Therefore, all employees, staff, volunteers and other associates will be briefed about the protocols to be followed where the breach of safeguarding policy or procedure occur. Priority will be to ensure that the child / vulnerable adult in question is brought back to the state of normalcy by ensuring their safety, well-being and good health.

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3.1 Reporting Procedure

Should a safeguarding incident occur, it is important to move the employee/ representative of CIPRB away from children by suspending their service until the completion of the fact-finding ('investigation') by the Safeguarding team. It is important to note that suspension doesn't mean that the allegations against the CIPRB representative are true. It is done to protect the child and the accused, and to minimise any likelihood of the process of fact-finding being hampered in any way. It is also important to ensure that until the completion of fact-finding, the identity of the accused and detail of the investigation are kept confidential wherever possible and efforts are made to discourage any rumours or gossip from spreading.

Categorisation of risks

Risks are dynamic and keeps on changing based on local context, laws, donor requirements, etc. However, the key is to regularly assess the potential risks within the organisation and programmes, to see what impact they may create, and then put in place control measures to prevent and mitigate their effect.

CIPRB broadly divides all the risks into two broad categories — high and other risks. See annexure 1 for risk matrix. The criteria to divide the risks into these are:

- a. What/ how grave would the consequences be? (this takes precedence over the second question as a deciding factor)
- b. What is the likelihood of these consequences occurring?

In case of high-risk incidents such as sexual assault / sexual abuse or physical assault, it is required under the law of land to involve law-enforcement agencies like the Police. It should be done immediately as otherwise the medical evidence that needs to be collected may not be available if there is any delay. Additionally, the members from the community may be involved in the fact-finding by the investigation team constituted by the safeguarding team to look into the matter.

In case where it is not a high-risk occurrence, suspension of the accused may or may not follow, depending on the severity of the case. This will be decided by the Safeguarding team. Employees will generally be issued two warnings in writing and the third occurrence can lead to termination of employment. However, depending on the severity of the case and on the effect the case has on the child, CIPRB may decide not to issue the second warning and instead, terminate the employment. A similar course of action may be necessary if the guilty employee fails to understand why the behaviour is unacceptable or doesn't commit to following the safeguarding policy and procedure in future.

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In case of a situation when a staff/ representative of CIPRB suspects of abuse in a child's family or in the family of another colleague, s/he should immediately report the matter to her/his supervisor as well as the safeguarding focal person/ team. Then the same procedure as laid out in the following protocols has to be followed.

PROTOCOL FOR DEALING WITH HIGH RISK CASES OF CHILD SAFEGUARDING

In the case of alleged harm caused, or likely to be caused, to a child or a vulnerable adult by any organisation staff / employee, volunteer or any other associate, observed by / reported to CIPRB representative, the following steps are to be followed:

- Ensure child safety by providing required support / refuge / comfortable space and company (immediately). Also:
 - a. Assure the child that s/he has done right by reporting
 - b. Ensure that confidentiality is maintained but also inform the child that in order to take action against the accused, the child's testimony may be required.
- Inform your line manager and the Safeguarding team / Safeguarding focal person regarding the incident (within 24 hours)
- iii. Inform the child's parents / guardian about the incident and measures taken to ensure the child's well-being and the steps to follow (i.e. the investigation)
- iv. Suspend the accused employee / staff / volunteer or any other associate until the completion of enquiry (upon receipt of complaint by Safeguarding team) In case the accused is a visitor / member of a partner organisation or any other non-staff person, all association with the individual / organisation / agency will be put on hold until the completion of the enquiry.
- v. The Safeguarding team will constitute a fact-finding team of 2-3 members which will include members from the Safeguarding team (field and head office)
- vi. Any decision regarding involving members from the community like the Village Injury Prevention Committee (VIPC) in the fact-finding team will be taken by the Safeguarding team.
- vii. Involvement of the law enforcement agencies will be initiated by the Safeguarding team in case of sexual assault / physical violence and the organisational investigation will be carried out simultaneously
- viii. The fact-finding team will submit an investigation report to the Safeguarding team and the senior management team (SMT), including the ED and the designated Board member (within 1-2 weeks)

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- ix. Based on the findings of the investigation, the safeguarding team and the SMT will make a decision regarding termination or restoration of services of the suspended accused.
 - In case of the accused found guilty, immediate termination of services, in accordance with the HR policy, will follow as decided by the Safeguarding team and SMT. In case the accused is not found to be guilty, the services of the employee will be reinstated and the employee will be compensated for the days of suspension as per his compensation package.
- x. The victim child and parents will be informed of the decision and assured of the safety of the child in the programme in future
 - a. As prescribed in the safeguarding protocols, individual follow-up will be done by CIPRB on the child's well-being
 - b. Group sessions will be conducted with all children at the location about their right to be protected and ways to report abuse
- xi. False and malicious accusation with deliberate intent is not acceptable. If it comes to light through fact-finding that such is the case, a disciplinary procedure will follow. If the false complaint is by a child, efforts will be made to understand why s/he did so and the child would be provided counselling support. S/he will be provided the support of safeguarding person(s) and kept away from any harm. Also, care will be taken not to reveal the identity of the complainant. The parents of the child would be involved in dealing with the matter.

See flowchart figure 2.1, annexure 2.

PROTOCOL FOR DEALING RISKS WHICH ARE NOT IDENTIFIED AS HIGH-RISK CASES OF CHILD SAFEGUARDING

- Ensure child safety by providing required support / refuge / comfortable space and company (immediately)
- ii. Inform the line manager and the Safeguarding team / safeguarding focal person about the incident (within 24 hours)
- iii. The line manager will decide in consultation with the Safeguarding team about informing the parents or not
- iv. A fact-finding team of 2-3 Safeguarding team members will be constituted by the Safeguarding team to begin the enquiry
- v. The Safeguarding team will decide whether the accused staff/ volunteer / any other associate will be suspended or not until the completion of fact-finding, depending on the case

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- vi. An investigation report will be presented by the fact-finding team to the Safeguarding team and the senior management team (SMT) including members as deemed appropriate by the safeguarding team (within 2-3 weeks)
 - In case of the allegations found to be true:
 - Safeguarding team will meet the accused and explain to her/him that her/his conduct / behaviour is against the values of CIPRB and violates the safeguarding policy
 - In case of the accused being an employee/ volunteer selected with the help of community (Example- Anchal Mas who are appointed by the Village Injury Prevention Committee), such community members/ bodies will be informed about the incident and the fact-finding result.
 - In case of first such incident on the guilty staff's part, a written warning will be issued to her/ him by the safeguarding team. The services of the guilty staff will be resumed after receiving an apology in writing along with the commitment to abide by the safeguarding policy in future
 - In case of repetition of such case, the safeguarding team along with HR and SMT will decide whether the guilty employee will be issued a second warning or will be terminated, depending on the severity of the case and/or the guilty employee's acceptance and resolve to make amends
 - In case of allegations found to be untrue:
 - · The services of the employee will be restored
 - Safeguarding team with the SMT, will decide on the action against the complainant for false accusation
- vii. The child and parents (when applicable) will be informed of the decision by the Safeguarding team
 - As prescribed in the safeguarding protocols, individual follow-up will be done by CIPRB on the child's well-being
 - Group sessions will be conducted with all children at the location about their right to be protected and ways to report abuse

See flowchart figure 2.2, annexure 2.

Follow up: All cases of safeguarding would be followed-up for 4 to 5 months after its occurrence. For details, refer to annexure 2.5.

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3.2 Documentation

In documenting the cases of child abuse, vulnerable adults' abuse or other concerns related to child and adults safeguarding, the following points have to be kept in mind:

- a. **Confidentiality** Identities of victim and witness, if any, need to be protected and not revealed unless required. Similarly, the identity of the accused also needs to be protected during the investigation.
- b. Type of allegation Objectively document the allegation / concern. Details should be collected and documented in an orderly manner, giving a true picture.
- c. Transparency Documentation should be done clearly and simply and should not be ambiguous.
- d. Accountability The person preparing the report / documenting the case, is accountable to the child or adult, the witnesses and the accused. Therefore, it should be done correctly and responsibly.
- e. Cross-checking and verifying Information documented must be cross-checked or verified whenever possible with reliable sources.
- f. Duration of storage the documents including reports, pictures and other testimonies will be stored for 5 years by CIPRB.
- g. Date, venue The report should clearly and correctly state the date and location of the event occurrence along with the date of documentation.
- h. Levels of access Accessibility of such reports should be restricted in order to maintain confidentiality. Therefore, it is critical to ensure proper storage and authorization protocol with regard to access to the reports.
- i. Documenting the steps in the process Steps in the process of investigation must be documented clearly and accurately. These should give a clear timeline and objective understanding of the case and the following investigation.

3.3 Decision and Action

Consequences for offences against children

- For non-negotiables/ high risk cases- termination, if investigation proves the accused guilty.
- b. For other acts violating the policy/ medium or low risk cases- it will be a warning in writing after investigation proves the accused guilty. A written apology will be submitted by the guilty person stating the offence and a promise that it won't be repeated in future with detail of how behaviour will change to ensure compliance.

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c. Repeat offence- Depending on the severity/ circumstances of the case, the SMT and Safeguarding team may decide to issue a last warning for a repeat offence or terminate the services of the guilty person.

This applies to all employees (part-time and full-time), board members, volunteers, consultants and trainers.

For visitors or other external persons, it will be immediate removal from premises followed by suspension of services / association. This may be followed by an investigation involving the law enforcement agencies depending on the severity of the case.

Consequences for offences against vulnerable adults

The Safeguarding team will undertake an investigation on every matter reported and will complete the investigation within a fortnight.

- In case of sexual abuse or violent abuse causing physical or mental damage, it is non-negotiable and would result in immediate termination. Depending on the case, law enforcement agencies will be involved.
- ii. In case of harassment / victimisation / discrimination against vulnerable adults, CIPRB will issue a warning in writing. In case such act is repeated for the second time, the Senior Management Team and the Safeguarding team may decide to issue a last warning or terminate the services of the guilty person.

False allegations would result in disciplinary action which may include termination.

3.5 Appeal or review

If a complainant or a concerned adult on behalf of a child/vulnerable adult, is not satisfied about the decision taken by the organisation regarding a case, s/he can make an appeal to Executive Director or the president (higher authority). The senior management, depending on merits of the case, may decide to reopen the case for further 'investigation' by a different team. This appeal can be made within 1 month of decision originally taken by CIPRB.

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3.6 Whistleblowing

Whistleblowing means reporting by employees or representatives of CIPRB of any misconduct, violation of the safeguarding policy or any other aspects that can harm children, vulnerable adults or put them at risk, within the organisation. CIPRB sees whistleblowing as a positive act, and not disloyal to colleagues and the organisation, which helps achieving the highest possible ethical standards in all its practice. CIPRB therefore encourages its employees to highlight any act or intention for misuse of organisational space or resources for wrongful activities related to children / activities that could harm children by any representative of CIPRB.

Whistleblowing is different from a grievance. A grievance is a matter of personal interest of an employee and doesn't have an impact on the wider public. Whereas whistleblowing includes reporting any serious concerns that the employee has about the service provision or the conduct of any member(s) of the organisation which can cause harm to children and vulnerable adults or are in contradiction to organisational values and principles with regard to safeguarding.

Organisation's Safeguards for Whistle-blowers: CIPRB understands that whistleblowing can bring possible retaliation against the whistle-blowers and therefore is committed to safeguarding them. It will not tolerate any harassment or victimisation, including informal pressures, of the whistle-blower and will take strict disciplinary actions if it is faced. The whistle-blower will be extended full support by the senior management and will be informed of the proceedings and steps taken to address the issue.

Confidentiality: The identity of the whistle-blower will be kept confidential. During the investigation process, he/she may be required to testify as a witness. In such case, the organisation will extend all possible support to the whistle-blower during this process.

CIPRB is committed to taking immediate action on the whistle-blowers' information. To ensure this, it expects each employee to be open to escalating concerns and restoring ethical practices. However, if a whistle-blower feels that there has been no response/action/ change from/ in the organisation, and feels that s/he has exhausted all options within the organization she/he has the option of reporting to the donor or concerned authority. However, this should be the last resort when no visible action is being taken on something reported, after the whistle-blower has approached every possible authority in the organization capable of taking action.

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4. Staff recruitment, onboarding and capacity building

In its commitment to create enabling environment at workspaces, CIPRB will recruit persons who have similar commitment, values and also have regard for children and vulnerable adults. This will be done by incorporating safeguarding elements in the process of recruitment and selection. Through regular capacity building, CIPRB will ensure that its representatives are well aware of the safeguarding policy and the legal obligations under the national laws. This will ensure that they work in alignment with CIPRB's values and principles. (For details, refer to annexure 6)

Performance Management

At the time of appraisals, due importance will be given to employees' understanding of the policy, systems, their conduct and performance with regard to safeguarding during the period under review.

Reporting requirement of Safeguarding team

In every quarterly meeting, members of the safeguarding team will inform the senior management about the cases of safeguarding of children and vulnerable adults reported in their respective areas, action taken and follow up of pending cases. They will also discuss initiatives being taken to strengthen safeguarding of children and vulnerable adults.

5. Communication

CIPRB in both its external and internal communication with various stakeholders, will ensure that children, vulnerable adults and communities at large are portrayed correctly and are not harmed due to such portrayal in any form. The elements of privacy and confidentiality in communicating stories and sharing information on children and vulnerable adults is mandatory. The following aspects should also be adhered to:

Things to be avoided:

- Exact address and names of parents, relatives etc. such information that reveals child's identity can be avoided unless specifically needed.
- ii. In legal cases or cases involving sensitive information, stories should have changed names especially of children, so as to protect their identity. In legal matters, it is an obligation under law.
- No personal analysis or interpretations to be included; no sensationalisation or dramatization of situation

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Things to do:

- Consent of the child / parents it is to be explained to the child and wherever possible, parents that the information is being documented and its purpose and their consent obtained. Their wish to not consent is to be respected.
- ii. Correct information to be captured and presented objectively
- iii. Maintain the child's dignity and honor in the documentation and be mindful of cultural sensitivities

For more details on best practices related to communication, refer to annexure 7.

Nutrition, hygiene and health (including mental health): from a child safeguarding perspective

It is critical to consider nutrition, health and hygiene for children from a safeguarding perspective. If ignored, it can lead to serious threat to children's well-being. Therefore, the following aspects will be given due importance during the course of engaging with children through various CIPRB interventions:

- a. Hygiene Children will be engaged in the centres / intervention sites in hygienic conditions and will be encouraged to keep themselves and their surroundings clean with support from caregivers (Anchal Mas, swim instructors etc.). Through hand-wash and toilet etiquettes, children will be taught about personal hygiene.
- b. Nutrition Parents should be encouraged to provide healthy food that children can bring to the learning centres. Similarly, if CIPRB arranges for food for children for events or decides to incorporate nutrition as part of the programme, it will ensure the provision of fresh and healthy food.
- c. Clean toilets Toilets for children in Anchals or other programmes, and for adults in field and head offices are to be kept clean and made accessible for children / persons with disability.
- d. Sitting arrangement Floor in Anchals and other centres have to be suitable, comfortable and injury-free sitting.
- e. **Disease outbreaks** Efforts will be made to minimize disease outbreaks in Anchals or communities where programmes are implemented with children.
 - Vector-borne diseases Fumigation and other repellants will be used to reduce vector-borne disease outbreaks. However, care will be taken that such measures will not lead to risk of poisoning.

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- ii. Communicable diseases Children suffering from infectious diseases like chicken-pox, flu etc. will be advised to take rest at home until their recovery in order to not spread the disease to other children. In unavoidable cases, unwell child will be given space in Anchal to rest, separate from other children.
- iii. Worms Parents must be made aware of the oral medications available for clearing worms or parasites from the human body. Staff should follow-up with parents whenever necessary, and children should be given the same as prescribed.
- f. Health emergency faced by staff working with children Sometimes Anchal Mas, CSIs or any family member of Anchal Mas (since Anchal is operated in their home) might face any medical emergency. In such situations, it is to be ensured by supervisor / AMO or other seniors that they are provided with immediate healthcare. At the same time, the safety of children in Anchal or at SwimSafe class at that time is to be ensured. Either another staff comes to engage children / ensure their safety or their parents be asked to take them home.
- g. Soiling A separate set of clothes can be asked for by parapets to be kept in Anchals / site of Swim Safe lessons for children to access in case of soiling. It is important for the caregivers to ensure that the child doesn't feel humiliated by other children / adults and is made comfortable.
- h. Medical health issues Caregivers must check with parents for any medical issues faced by children, like epilepsy or allergic status. It is necessary that such children are supervised properly and their surrounding be made injury-free. All staff members engaging with such children should know about the child's health issues and steps to follow in case of any emergency.
- Mental health issues Caregivers and supervisors must be equipped in identifying mental health issues among children. Basic training for such identification will be provided to them.
 - After identification, it is important to provide for assessment and counselling for such children and vulnerable adults.
- j. Discrimination / humiliation To ensure holistic mental development of children, it is important to make a safe and enabling environment in the programme sites where children learn / stay. No staff, visitor, volunteer or any other associate will discriminate among children or humiliate / compare children or subject them to any such behaviour which is mentally traumatizing for them.
- k. Vaccination Parents should be made aware of the significance of vaccines for children and encouraged to vaccinate their children. They should be asked not to send children with any disease to the learning centre as the disease can spread to other children/ in the community.

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- Phobias Children might have different phobias which interfere with their growth or normal life. It is important to report such cases, if any and seek required help.
- m. Personal problems Children may be subjected to mental stress due to various issues at home. While children should be given a safe environment, which encourages them to speak to their caregivers about such issues, it is also necessary for the caregivers to make efforts to identify such cases and seek appropriate help. Information on the child's parents must be known to the caregivers (e.g., parents staying separate or are divorced, father is an alcoholic and abuses the child, mother neglects the child etc.). Depending on the severity of the case, the responsible persons will take action as per the protocols for handling risks of risks.
- n. Children with disability Centres accessed by children should be made disability-friendly and accessible. It is also important to ensure that children with disability are not segregated or discriminated against, by other children / staff and that they don't feel humiliated by the language of staff or content in the text books (e.g. stories or rhymes mocking disabled or portraying them as less capable).
- o. **Equal development of children** Whether at Anchals or other programme sites, all children must be given equal opportunity to grow and learn.

7. Inclusion and Child Participation

CIPRB believes in the rights of persons with disability (physical and mental) as enshrined in the national law. It also believes in equal opportunities for women and people belonging to minorities and vulnerable communities like Dalits. (Also refer to gender policy)

Programme level measures: CIPRB will make efforts to engage children and adults with disability or those belonging to minority or vulnerable communities without any discrimination. Additionally, it would try to provide support to such children by building ramps, providing wheelchair, arranging for transport and so on in all its areas of operation.

Children's Participation

CIPRB considers children's participation as an important element of its work as it is described in the Children's Act and the United Convention on the Rights of the Child. The mechanisms that would ensure children's participation in the organisation are as follows:

a. Children's meeting - This will be held every month in every children's centre. At least 2 responsible adults would be attending this meeting of children to listen to children's issues and help in finding solutions.

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b. Suggestion box - This will be kept in every children's centre. It will be opened every week/ every fortnight/ every month (on the basis of programme feasibility) by 2 responsible adults and action will be taken within a week on the issues or complaints made by the children.

Suggestion boxes will also be placed at prominent locations in the community to ensure that children can leave critical suggestions / raise concerns even after exiting the programme. These will also be opened every week by 2 responsible adults designated by the safeguarding team and action will be taken within a week on the issues or complaints made by the children.

For all events involving children's participation, there will be a process of rigorous risk assessment before the events, during and after the events. Children's participation will be carried in a safe manner.

Child safeguarding after programme exit

CIPRB runs programmes for children of certain age groups e.g. under age 5 for the Anchal intervention and 4- 10 years for the swim safe programme. It has been observed that children may come into vulnerable situations after leaving the programme. Therefore, CIPRB will have an exit plan for each child so that some safeguards could be ensured at the family or school level. If any child after exiting a programme is seen or reported to have gone into a high-risk situation e.g. indulging in prostitution etc., efforts will be made to see that the child gets help from the appropriate agencies.

8. Expanding child protection services - collaborating with relevant agencies

In the context of a large number of children being brought under this safeguarding policy, it is important to have an expanded set of direct and referral services for child protection. This is possible with active collaboration with existing agencies, both government and non-government operating in CIPRB's intervention areas. For instance, CIPRB will be actively engaging with the Department of Social Welfare for extending services or making available facilities like children's homes for children at risk. Similarly, it will associate with other NGOs on issues of child marriage, mental health and so on. Refer to directory of important facilities/ services related to safeguarding in annexure 8.

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Annexures

Annexure 1: Risks faced by Children, and Matrix: Prevention of Risks

As identified during meetings with:

- · CIPRB's Board, Dhaka
- Senior Management Team Dr. AKM Fazlur Rahman (ED), Dr. Aminur Rahman (Director), Dhaka
- HR and Finance Team, Dhaka
- CIPRB Safeguarding Team, Dhaka
- CIPRB Project Team Bhasa and SeaSafe, Dhaka
- Project team at Taltoli, Barishal
- Project team at Kolapara, Barishal
- Debriefing at Amtoli, Barishal
- SeaSafe Project team at Cox's Bazar
- Life guards at Laboni, Sugandha and Kolatoli Beach, Cox's Bazar

Risks

CULTURAL

- 1. Cultural norms and issues, traditional practices and religious norms affecting children
- 2. Religious discrimination
- 3. Risks in religious institutions (e.g., boy chained in a madarasa by the priest after the parents asked him to restrain the boy)
- 4. Child marriage
- 5. Dowry
- 6. Dress code for Anchal in summers; children come with no shirts and it is uncomfortable during sleeping time for children

SOCIETY'S PERCEPTION

- 7. People's attitude and behaviour towards child protection / rights
- 8. People's perception about risks

ABUSE IN FAMILY

- 9. All kinds of abuse in home (not openly spoken)
- 10. Aggressive behavior among children due to similar atmosphere at home
- 11. Sexual and physical abuse within families by members, relatives etc.

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CORPORAL PUNISHMENT

- 12. Aggressive handling of children by Anchal mas of CSIs
- 13. Showing of stick by Anchal mas in Anchal
- 14. Corporal punishment in schools

ORGANISATIONAL CHALLENGES

- 15. New staff has low awareness about child protection
- 16. Paid volunteers (e.g. Anchal Mas) not much educated, difficult to make them aware due to cultural issues
- 17. Mistreatment by Anchal Mas (use of verbal, physical abuse)
- 18. No female supervisor in X number of districts
- 19. Raising issues can lead to threat to CIPRB / issues might be politicized
- 20. No reference checks for persons recruited in CIPRB
- 21. Inadequate number of meetings with children by senior staff
- 22. Inadequate number of meetings by Anchal supervisors
- 23. Behaviour management of staff w.r.t. children how to discipline children, how to handle children's non-participation / disinterest

SEXUAL ABUSE

- 24. Child trafficking
- 25. Sexual abuse of children
- 26. 'Eve teasing' / harassment
- 27. Children used for body massage on the beach
- 28. Child sex work
- 29. Sexual abuse by teachers at school / madrasa/ other religious institutions

PHYSICAL HAZARDS / INFRASTRUCTURE

- 30. Physical risks (rains, storms etc.) while children come for swimming training and go back
- 31. Need for injury-free IEC material
- 32. Drowning after Anchal closes
- 33. Physical hazards in Anchal
- 34. Fire incidents in Anchal
- 35. No risk assessment by clubs offering surfing lessons
- 36. Changing room for girls not proper
- 37. No different toilets for girls and boys under SwimSafe programme
- 38. Need for a shed over portable swimming pool to prevent insects from trees falling in the pool

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MEDIA RELATED CHALLENGES

- 39. Influence of television and movies; western culture; increased rapes
- 40. Mobiles, internet, social media, pornography
- 41. Taking children's photos and videos without permission
- 42. Pictures of field staff taken by community

DEVELOPMENTAL ACTIVITIES

- 43. Lack of entertainment for children
- 44. No space for children to voice their opinions
- 45. Opinion of children not taken especially for younger children not considered important

HEALTHCARE

- 46. Health issues; less health services available; adolescent health issues.
- 47. Sickness, health emergencies at programme site
- 48. Provision of food for children in Anchal
- 49. First aid box not there for SwimSafe and Anchal initiatives; need of first-aid training
- 50. Substance abuse among children

SOCIO-ECONOMIC CONDITION

- 51. Child labour (Child domestic workers, hawkers)
- 52. Child begging

GENDER BASED DISCRIMINATION

- 53. More girls dropout from swimming lessons
- 54. Less enrollment of girls for swimming lessons
- 55. School dropout among girls for child marriage
- 56. Gender based discrimination among children

OTHER SAFETY ISSUES

- 57. Children leaving with adults other than parents
- 58. Children leaving from Anchal before 1 pm (multiple times)
- 59. Entry of other family members in Anchal
- 60. For SwimSafe initiatives, children come for the training alone
- 61. Acid attack, especially on girls

Preventive measures for tackling risks

CIPRB believes that it should create an environment and have adequate measures that can prevent risks related to child safeguarding from occurring.

Creating an environment to prevent harm

This means all members of CIPRB and associates are well aware that CIPRB does not tolerate any kind of abuse or exploitation of children and vulnerable adults and there are consequences for violating this policy. Also, it is the responsibility of each employee to report any kind of malpractice that puts children or vulnerable adults at risk (refer to

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section on whistle blowing). Children or vulnerable adults have supporting structures i.e. children's forum or the safeguarding team for support against any perceived/ intended harm. During the regular monitoring visits to Anchals and SwimSafe programmes, supervisor (including AMOs, ACs and PC) will have to observe, take action and report on certain critical aspects of child safeguarding, for instance, observing handling of children, physical safety of children etc. These points need to be included in the monitoring checklist.

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Matrix- Prevention of Risks

	Groups of Risks	Type of Risk (High or other)	Measures/ Action needed for prevention	Responsibility
1.	1. Cultural (includes traditional	Mix of medium or high risk	Identifying malpractices in the community	Research team
	practices, child marriage, dowry and others)		Listening to children/ having children's forums- identifying issues faced by children (for preventing harm or finding solutions)	Project team + senior management
			Finding solutions to prevent malpractices in the community-Involvement of VIPC and UIPC is crucial for this.	Research team+ Project team
			Development of IEC materials (posters, stickers, videos, etc.)	Project team + Communication team
			Conducting mass awareness in intervention areas	Project team
			Sensitisation of Union, Upzila, District level stakeholders	Policy and advocacy team, Project team and Communication team
			Regional/ divisional stakeholders' engagement	Policy and advocacy team
			Influence national level stakeholders for policy change	Senior management and Project team

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2.	Society's perception (people's attitude towards child protection and rights and their perception of risks)	Low or Medium	Sensitising/ educating general public about child rights, protection and risks children face	Research team, communication team and project team
3.	Abuse in family	Medium or High	Anchal Maas and other field staff should report such matters Discussion with parents Involvement of VIPC	Project team
4.	Corporal Punishment	Medium or High	Orientation of all staff that corporal punishment is illegal and a non-negotiable item in our safeguarding policy Engaging with school authorities where corporal punishment is	Senior Management along with Safeguarding team Project team and member of safeguarding team
5.	Organisational Challenges- this includes inadequate number of female staff, finding sensitive and skilled staff, lack of orientation or training on safeguarding issues, improper handling of children	Medium or High	Adequate and quality staffing Orientation and training on safeguarding	Senior management Senior management and Safeguarding team

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6.	Sexual abuse	High	Orientation of all staff that sexual abuse is illegal and a non- negotiable item in our safeguarding policy	Senior Management along with Safeguarding team
			Engaging with school authorities where sexual abuse is reported	Project team and member of safeguarding team
			Awareness action in the community regarding sexual abuse	Research team, communication team and project team
7.	Physical Hazards/ Infrastructure	Medium or High	Undertake risks assessment of all centres for children and see that these spaces are risk free	Project team + senior management Supervisors to check for risks factors regularly and take corrective action.
8.	Media related challenges	Low, Medium or high	Orientation of staff regarding Dos and Don'ts related to photography, videography and social media Visitor's policy – to prevent photography or videography without permission	Senior management + Safeguarding team
277			Discussions with children on issues of tradition, modernity and other topics (to tackle influence of movies. TV etc.)	Project team and/ education resource persons

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9. Developmental Activities- lack of entertainment or constructive engagement of children and children's opinions are not heard or taken seriously	Low, medium	Include fun and educational activities while children are at the centres. Organise sports and cultural events (involve the community) Initiate children's forums viz.: a. Children's committee b. Suggestion box	Project team+ Senior management Project team + Safeguarding team
10. Health care	Low, Medium or High	Provision of first aid kit at every children's centre Maintain hygiene at each centre Discussion with adolescents on health issues (including	Senior Management + Project team Anchal Maas, Anchal assistants and supervisors Project team and/ resource persons
11. Socio Economic condition- child labour, begging	Medium, high	menstruation) and topics like substance abuse Awareness action in the community on issues of child labour, begging and government provisions and schemes for poor families	Project team, Research team Linkages with other agencies working on poverty issues
		Involvement of VIPC for supporting extreme cases of poverty Encouraging parents of children in work/ begging to enroll them	Project team Project team

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12. Gender based discrimination	Medium or High	Proactive measures to enroll girls in anchal, swimsafe and other programmes + taking action to prevent dropout of girls	Senior management and project team
		Orientation of all staff on the safeguarding policy for preventing any forms of gender- based discrimination.	Senior management + Safeguarding team
13. Other Risks- children coming or leaving the centres alone, other hazards on	Medium or High	Ensure adult company (from family) while children come or leave the centres	Project team
the way		Discuss issues such as eve teasing in meetings with parents and VIPC and find solutions	Project team and Safeguarding team

Note: These were identified in consultation and discussion with staff members and other field stakeholders, including children and young people. However, risk is dependent on circumstances and is contextual. What is medium risk for an organisation can be high for a donor or families, and vice versa. However, it's very important is to regularly assess the potential risks within the programmes an organisation, to see what impact it may create, and then put in place control measures to prevent and mitigate its affect.

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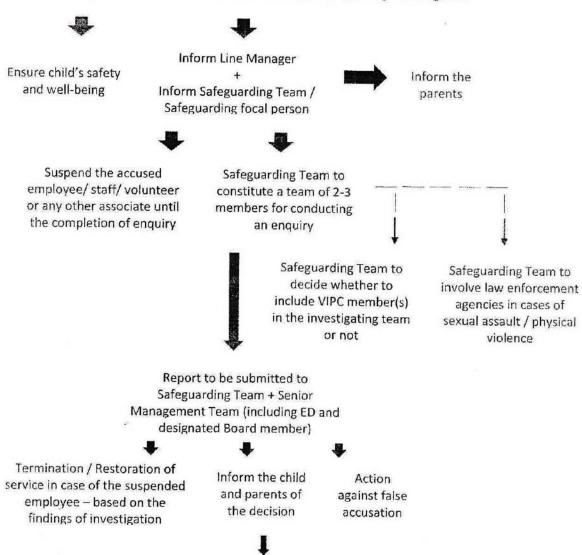
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Annexure 2: Protocols for dealing risks

2.1 PROTOCOL FOR DEALING WITH HIGH RISK CASES OF CHILD SAFEGUARDING

Alleged harm caused, or likely to be caused to a child or a vulnerable adult by organisation staff / employee, volunteer or any other associate, observed by / reported to CIPRB representative.

CIPRB representative observes / receives complaint regarding the allegation



Individual follow-up on child's well-being as per the Safeguarding protocol

Group session with all children about their right to be protected

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2.2 PROTOCOL FOR DEALING WITH MEDIUM/LOW RISK CASES OF CHILD SAFEGUARDING

Alleged harm caused, or likely to be caused to a child or a vulnerable adult by organisation staff / employee, volunteer or any other associate, observed by / reported to CIPRB representative.

CIPRB representative observes / receives complaint regarding the allegation



Ensure child's wellbeing by taking to them and reassuring that they are safe



Inform Line Manager

Inform Safeguarding Team / Safeguarding focal person



Line manager to decide in consultation with Safeguarding Team on whether to inform parents or not



Safeguarding Team to constitute a team of 2-3 members for conducting an enquiry



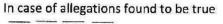
Safeguarding Team to decide regarding the suspension depending on case severity

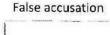


Report to be submitted to



Safeguarding Team + Senior Management Team





Restoration of service

Safeguarding Team with SMT to decide for action against the complainant Safeguarding Team to talk to the accused and explain that the behaviour is against CIPRB's principles and a violation of Safeguarding Policy

Inform VIPC in case of the guilty employee being an Anchal Ma

In case of first such incident

In case of repetition of such incident

Safeguarding Team / HR / SMT to issue warning in writing +

Guilty employee to submit apology in writing and commitment to abide by the Safeguarding Policy

Safeguarding Team/ HR/ SMT to decide about second warning or termination depending on the severity / employee's acceptance and resolve to amend



Inform the child and parents (when applicable) of the decision

Individual follow-up on child's well-being as per the Safeguarding protocol

Group session with all children about their right to be protected

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2.3 DISCIPLINARY ACTION FOR NON-REPORTING OF CASES OF CHILD SAFEGUARDING

In case any CIPRB representative observes or gets to know of any case of violation of child safeguarding and chooses not to report the matter to the safeguarding team, disciplinary action will be initiated against the employee by the safeguarding team upon finding out the same. The following steps are to be followed in such a case:

- Safeguarding team will designate staff to visit the child and assess the situation in order to determine the need for providing safety/ support/ refuge/ comfortable space to the child (immediately upon discovering about the case)
- ii. An investigation team of 2-3 Safeguarding team members will be constituted by the Safeguarding team to begin the enquiry regarding the case as well as the lapses on part of the employee who did not report / hid the details.
- iii. The Safeguarding team will decide whether the accused staff/ volunteer/ any other associate will be suspended or not until the completion of investigation, depending on the case.
- iv. An investigation report will be presented by the investigation team to the Safeguarding team and the senior management team (SMT) including members as deemed appropriate by the safeguarding team within 5 working days.

In case of the allegations found to be true:

- a. Safeguarding team will meet the accused and explain to her/him that her/his conduct/behaviour is against the values of CIPRB and violates the safeguarding policy.
- b. In case of the accused being an Anchal Ma or a Community Swim Instructor, the Village Injury Prevention Committee (VIPC) will be informed about the incident and the investigation result (since they are selected by the VIPC). Similarly, in case of the accused being a fire safety instructor or a school teacher, the respective authorities like Fire Service and Civil Defence and school management committee should be informed.
- c. The safeguarding team will decide whether the guilty employee will be issued a warning or will be terminated, depending on the severity of the case and/or the guilty employee's acceptance and resolve to make amends
- d. In case of issuing a warning, the same will be issued in writing by the safeguarding team. The services of the guilty staff will be resumed after receiving an apology in writing along with the commitment to abide by the safeguarding policy in future. The safeguarding team along with HR may decide if any penalty will be imposed on the accused or not.

In case of allegations found to be untrue, the services of the employee will be restored

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- v. The child and parents (when applicable) will be informed of the decision by the Safeguarding team
- vi. As prescribed in the safeguarding protocols, individual follow-up will be done by CIPRB on the child's well-being
- vii. Group sessions will be conducted with all children at the location about their right to be protected and ways to report abuse
- viii. A briefing / session will be done with all employees (either immediately or in the next capacity building session by safeguarding team as deemed appropriate by the safeguarding team) to emphasis on the need to immediately report concerns related to child safeguarding.

2.4 Interviewing the child

- i. Consent It is important to take informed consent of the child against whom misconduct / abuse has been committed for conducting the interview to discuss the case. Depending on the case, the consent of the parents may also be required. It needs to be explained to the child / parents why it is important to receive this information to ensure that corrective measures are taken. The consent must be obtained in writing. Similarly, consent needs to be obtained from the child / parents to take pictures or recordings during the interview.
- ii. Safe environment Do not interview the child in the presence of the accused / perpetrator under any circumstances. Provide a calm and safe environment for the child to share without any fear.
- iii. **Presence of counsellor** In serious cases of abuse (e.g. rape, sexual assault, grievous hurt etc.) it is important to have a psycho-social counsellor while interviewing the child, in order to avoid the risk of further harm to the child by bringing back the traumatising memories.
- iv. **Documenting interview** It is desirable to have another person for documenting the interview so that the person talking to the child, can talk normally without having to take notes. However, this depends on the comfort of the child. One can also use a voice recorder to record the interview (with the child's consent).
- v. Female Safeguarding team member It is important to have a female Safeguarding Team member in case of interviewing a girl child or vulnerable adult.
- vi. Sensitive questions The interviewer must be sensitive to the child while asking questions which need the child to recollect the traumatising details of abuse. The child must be made comfortable before asking such details and should be assured of his / her safety. The child should be informed that they need not answer if they feel uncomfortable. Questions should be structured and to the point and should not cause mental stress to the child.

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- vii. Verbatim documentation Documentation should be done verbatim and stick to what the child shares. It should not include personal analysis or opinions of the interviewer or the person documenting. Their remarks, if any, must be communicated separately.
- viii. Respect the child's dignity Ensure that the process of interview doesn't humiliate or make mockery of the child in any way. The child's dignity must be maintained and the interviewer must respect how the child feels or what the child says.

2.5 Follow-up

- Assigned one-two members will be responsible for the follow up on each case reported.
 These members will be assigned by the Safeguarding Team.
- ii. First two follow-ups will be conducted by members from the head office along with members from the field teams
- iii. First follow-up meeting by the Safeguarding team (one or more members) with the child will be done within a week of the incident reported.
 - a. Follow-up meeting with the child post investigation will be done within a week after the decision by the Safeguarding team.
 - b. Two more follow-up meetings with the child will be done one after one month and another after a quarter.
 - c. The need of further meetings / follow-ups will be assessed at the end of the quarter and followed.
- iv. All the follow-up meetings will be properly recorded and stored.

2.6 Informing the child

Safeguarding team will ensure that the child is informed of the decision taken after the investigation. They must be assured that the organisation is committed to their safety and well-being. Follow-up with such children will be done in accordance with the procedure for follow-up mentioned in this policy.

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Annexure 3: Consent for use of photos and Information



CIPRB Consent Form

Hi! My name is	
	I have been explained that CIPRB works with children
一等 第一部 第一部	in many parts of Bangladesh to help them learn
	different skills and to provide them safer and better
	environment to learn and grow.

I understand that CIPRB gets to know of children's stories about their lives in order to help them better. They may also take photos and videos to help people in Bangladesh as well as other parts of the world, understand the challenges that children face and to receive their help in making the condition better.





I am comfortable with CIPRB to take my photos and share my stories

I understand that the same may appear on their website, social media, reports or material that they create.

But I have also been informed that my personal details like name, location / address etc. will be changed so no one knows it is about me.

I am aware that I can change my mind at any point and ask CIPRB to stop taking / using my pictures / story or any other details about me.

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Annexure 4: Statement of Commitment to Safeguarding of Children and Vulnerable Adults

Statement of Commitment by the Employee of CIPRB
I,, an employee of CIPRB, have read and understood the Safeguarding Policy for Children and Vulnerable Adults. I completely agree with the intention, procedures, code of conduct and systems mentioned in the policy and will abide by those.
I agree with the need for reference checks to verify my credentials and records as part of the checking procedures of CIPRB and will extend full cooperation to CIPRB in this regard.
I am committed to doing my share in ensuring a safe and enabling environment for children and vulnerable adults, in workspace and personal life. For any violation of the policy, CIPRE can initiate action against me as written in the policy.
Signature:
Name:
Address:
Contact Details:

Prof. Muhammad Ghulam Rahman President

Centre for Injury Prevention and Research, Bangladesh (CIPRB)

Annexure 5: National Legislations and Policies

The Constitution of Bangladesh ensures rights, protection and safeguarding for children in its directive principles of state policy [Articles 15, 17 and 25(1)], the fundamental rights [Articles 27, 28(1) (2) (3)(4), 31, 32, and 39(1)(2)], the power of judicial review [Articles 26(1)(2)]. Articles 27, 28 and 31 of the Constitution lay down the general principles regarding the protection of children from all forms of discrimination.

Bangladesh has enacted several national legislations and policies that directly and indirectly indicate the obligation to protect and safeguard the best interest of children. Individuals, national and international organisations and other stakeholders are obliged to protect, promote and respect the rights, dignity and best interest of children in the country. There are also specific laws and policies to protect and promote the rights of vulnerable adults like persons with physical or mental disability.

The key legislation that acknowledges, promotes and protects the rights of the children in Bangladesh was enacted as Children's Act 1974. In 1989, after ratifying the UNCRC, Bangladesh developed the National Child Policy in 1994. In the last decade, the Child Protection Policy, 2011 and the amended Children's Act, 2013 have been introduced to ensure multidimensional development of children.

To eliminate child labour, Bangladesh government has developed Child Labour Elimination Policy 2010, to protect the children from commercial exploitation. The policy specifies that under the age of 14 years, a child cannot be employed as a regular employee and can only do non-hazardous work.

To protect the children and adults with disability, Bangladesh government has enacted the Persons with Disabilities Rights and Protection Act in 2013. The law ensures protection from discrimination, cultural taboo and promotes inclusive education, public transport, workplace, etc. for persons with disability.

The Domestic Violence (Prevention and Protection) Act, 2010 was enacted to address the domestic violence in the country. The Act designates the duties and responsibilities of police officer, enforcement officer, service provider, shelter homes and medical service providers to ensure the protection of women and children.

Other relevant state legislations and policies related to children and vulnerable adults are Information and Communication Technology Act 2006, the Prevention and Suppression of Human Trafficking Act 2012, the Child Marriage Restraint Act 2017, Neuro Disabilities Act 2013 and the Pornography Control Act 2012. Also important is the High Court Verdict on Sexual Harassment Guideline 2008, to ensure effective measures to protect the children and vulnerable adults. (Ministry of Law, http://bdlaws.minlaw.gov.bd/)

The safeguarding policy has been developed with the essence of the national laws and policies, which ensures the rights, dignity and welfare of a child.

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Annexure 6: Staff Recruitment and Capacity Building

Recruitment and Selection

- a. Job description for each post and key selection criteria will be advertised / shared on decided platforms so as to attract the best candidate for the job.
- b. Along with knowledge and expertise to deliver as per the job description, a person specification will be shared to highlight personal traits / values that the candidates must possess in order to be aligned with CIPRB's commitment to safeguarding. Some of such specifications are as follows:
 - i. Experience of working with children (preferably)
 - ii. Knowledge of child rights
 - iii. Interest in working with children; love and respect for children
 - iv. Enthusiastic
 - v. Friendly
 - vi. Cultural awareness and sensitivity
 - vii. Appreciation for diversity
 - viii. Belief in the cause of children and the need for safeguarding
 - ix. Handling work pressures in a professional manner (calm response, not 'lashing out' on co-workers / children)
 - x. Possessing qualities like child friendly personality, singing and dancing (for Anchal Mas, Community Swim Instructors (CSIs), Area Monitoring Officers (AMOs), school educators and others to engage children in an interesting manner.
- c. Questions to assess candidates' perception with regard to safeguarding aspects will be incorporated in the interview process and selection be done accordingly.
- d. Offer of employment will be made after obtaining two satisfactory written references from two different organisations.
- e. During the probation, the performance of the employee will also be assessed on the parameter of safeguarding.
- f. It is a contractual obligation to sign a commitment to CIPRB's Safeguarding Policy for children and vulnerable adults.

Capacity building

- As part of orientation of every new employee, a clear understanding will be provided on the Safeguarding Policy and its implementation procedures (within second week of joining).
- 2. Each worker should receive a Bangla version document of the policies and its implementation procedures.
- 3. A day-long refresher capacity building workshop on safeguarding issues will be arranged yearly and it is mandatory for all representatives of CIPRB to participate in the same.

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Annexure 7: Communication

Child's respect, dignity and personal wish will be given utmost importance during interactions with them. They will not be subjected to any conditions which make them feel humiliated or violated. Their informed consent is needed in obtaining information from them or taking their pictures. By informed consent, it is meant that the children are made aware of why the information / picture is needed, how it will be used and that they are under no obligation to agree to its use. It is also important to remind them that they have the right to withdraw their consent at any stage and the staff cannot proceed against their wish.

It is important to note that at times it is difficult to obtain the consent. For example, in case of a drowning child / adult, it is important to take pictures for references and documenting the case, however the saved person may not be in a condition to provide consent. In such cases, CIPRB representative will take the required pictures, following the guidelines and the consent will be obtained later, before using the images.

With children and community

- a. Message needs to be consistent in meetings with community and children, interactive popular theatre (IPT) shows, IEC materials, community radio etc.
- b. Content/ message should be sensitive to the community and not stereotype or humiliate them.
- c. Be sensitive and respectful with children in your communication. Respect their boundaries and initiate communication only when they consent or show comfort.
- d. Curriculum followed in the centres for children should be such that doesn't mock differently-abled children/ people, or encourage unethical behaviour or promote animal cruelty or has obscene/ foul language or anything that can be traumatising for children.
- e. Do not force children to do anything against their wish. Inform them clearly while obtaining their consent that they have the right to withdraw the consent at any stage if they don't feel comfortable.

Case stories

Things to be avoided:

- i. Exact address and names of parents, relatives etc. such information that reveals child's identity can be avoided unless specifically needed.
- ii. In legal cases or cases involving sensitive information, stories should have changed names especially of children, so as to protect their identity. In legal matters, it is an obligation under law.
- iii. No personal analysis or interpretations to be included; no sensationalisation or dramatisation of situation

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Things to do:

- Consent of the child / parents it is to be explained to the child and wherever possible, parents that the information is being documented and its purpose and their consent obtained. Their wish to not consent is to be respected.
- ii. Correct information to be captured and presented objectively
- iii. Maintain the child's dignity and honor in the documentation and be mindful of cultural sensitivities

Photography / Videography

Do with:

- Child's consent explain the purpose behind taking the picture and obtain the child's consent
- ii. While using pictures externally, receive written consent from children and / or parents
- iii. Consideration for child's personal space and comfort
- iv. Intention to portray the situation in its original and true form while ensuring the subject's dignity and privacy, with clear context and timeline given

Don't if

- i. The child is undressed / not properly dressed
- ii. The child is not in a situation to give consent i.e. sleeping or unconscious
- iii. The child changes their mind and withdraws consent
- iv. It is a legal case and revealing the child's identity can cause harm

Social media

- i. Do not post pictures of children which do not give clear context, background or are irrelevant to the work
- Do not reveal identities of children or persons who are vulnerable or involved in legal matters through posts
- iii. Do not put up posts / pictures which show the community / children in poor light and encourage stereotypes. Be objective in highlighting problems in the community.

For visitors

- No pictures to be taken without the permission of CIPRB staff. Staff will seek the consent of children / parents / community members when needed.
- ii. No probing for personal information of children unless the objective of the visit demands so (with prior permission)
- iii. No posting of pictures / information on personal social media without discussing with the CIPRB's communication team

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With external stakeholders like journalists and media houses

- i. Consistent message from the organisation to designated members of the media that helps to minimise risk of harmful coverage
- ii. No sharing / revealing of children's personal information with names, addresses etc. under pressure.
- iii. Where case studies need to be shared, names of the children need to be changed to protect their identities.

Head office will share an information sharing protocol for external agencies and provide training for staff on the same.

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Annexure 8: Directory of emergency contacts

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Contact Person	Nusrat Zerin nusrat@ciprb.org (For safeguarding concerns)			Md. Masudur Rahman, DC Media, Media and Public Relations Division		il		Dr. Salim Mahmud Chowdbury PhD General Secretary Centre for Injury Prevention and Research, Bangladesh (CIPRB)
Website	www.ciprb.org			www.dmp.gov.bd	www.msw.gov.bd	www.mowca.gov.bd	www.mowca.gov.bd	Dr. Sali Centre Resear
Address	House: B 162, Rd No 23, New DOHS, Mohakhali Dhaka			DMP Media Center, 36 Minto Road, Dhaka.	Ministry of Social Welfare Bangladesh	Ministry of Women and Children Affair	Ministry of Women and Children Affair	
Phone Number	02-58814988	666	199	8616552-7 100, 9619999 (24/7 Contact)	1098 (24/7 Contact)	109 (Hotline)	10921	
Name	Centre for Injury Prevention and Research (CIPRB) Head Office	Special Emergency Number	National Fire/ Ambulance	Dhaka Metropolitan Police	Child Helpline	National Woman and Child Violence Prevention Helpline Centre	Child Marriage Prevention Helpline	Prof. Muhammad Ghulam Rahman President Centre for Injury Prevention and Research, Bangladesh (CIPRB)
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Amended on 02 November 2019

Annexure 8: Directory of emergency contacts

,5	Name	Phone Number	Address	Website	Contact Person
L i	Centre for Injury Prevention and Research (CIPRB): Head Office	02-58814988	House# B-120, Road# 07, New DOHS, Mohakhali Dhaka	www.ciprb.org	Safeguarding Focal Sangeeta Barua sangeeta@ciprb.org safeguarding@ciprb.org (For safeguarding concerns)
2.	Special Emergency Number	666			
æ.	National Fire/ Ambulance	199			
4	Dhaka Metropolitan Police	8616552-7 100, 9619999 (24/7 Contact)	DMP Media Center, 36 Minto Road, Dhaka.	www.dmp.gov.bd	Md. Masudur Rahman, DC Media, Media and Public Relations Division
5.	Child Helpline	1098 (24/7 Contact)	Ministry of Social Welfare Bangladesh	www.msw.gov.bd	



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					reportingconcerns@dfid.gov.uk	DFIDBangladeshInquiry@dfid.gov.uk
www.mowca.gov.bd	www.mowca.gov.bd	www.ict.gov.bd	www.minlaw.gov.bd	www.blast.org.bd		
Ministry of Women and Children Affair	Ministry of Women and Children Affair	Ministry of ICT (Information and Communication Technology)	Ministry of Law, Justice and Parliamentary Affairs	1/1 Pioneer Road, Kakrail, Dhaka-1000, Bangladesh		British High Commission, Road 3 United Nation Rd, Dhaka 1212
109 (Hotline)	10921	01766678888	01761222222-4 16430 (Hotline)	01715220220	+44(0)1355 843747	02 55668700
National Woman and Child Violence Prevention Helpline Centre	Child Marriage Prevention Helpline	Bangladesh Cybercrime Prevention Helpline	National Legal Aid Helpline	Bangladesh Legal Aid and Services Trust (BLAST)	Counter Fraud and Whistleblowing Unit (CFWU) – Global	Department for International Development
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Note: CIPRB will update the directory further with other important contact details.