

Protection from Sexual Exploitation, Abuse & Harassment (PSEAH) Policy



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Table of Contents

1. INTRODUCTION	3
2. SCOPE	3
3. PURPOSE & OBJECTIVE	4
4. POLICY PRINCIPLES.....	5
4.1. IASC Six Core Principles on Sexual Exploitation and Abuse.....	5
4.2. Organisational PSEAH Principles	6
5. RESPONSIBILITIES AND ACCOUNTABILITIES	7
6. POLICY STATEMENT	12
7. PREVENTIVE MEASURES	14
7.1. Policy Integration and Accountability.....	14
7.2. Safe Recruitment	14
7.3. Training and Capacity Building.....	15
7.4. Awareness Raising and Communication.....	15
7.5. Risk Assessment	16
7.6. Working with Partners, Contractors, Suppliers and Vendors	16
7.7. Safe Programming and Community Engagement	17
8. REPORTING AND RESPONSE MECHANISM.....	17
8.1. Reporting Obligations and Channels.....	18
8.2. Survivor-Centred Response.....	19
8.3. Survivor Assistance	19
8.4. Referral Pathways.....	20
8.5. Investigation and Case Management.....	21
8.6. Referral to National Authorities	21
9. CONFIDENTIALITY	23
10. MONITORING & EVALUATION.....	24
11. DISCIPLINARY ACTIONS	25
12. TRAINING AND AWARENESS.....	26
13. REVIEW AND UPDATES OF THE POLICY.....	27
14. REFERENCES	28
APPENDICES.....	29
Appendix 1: Glossary	29
Appendix 2: Incident Reporting Form	32
Appendix 3: Referral Form.....	35
Appendix 4: TOR for Investigators.....	38
Appendix 5: Risk Assessment Template.....	40
Appendix 6: Service Mapping	40
Appendix 7: TOR for the PSEA Focal Points	40
Appendix 8: Code of Conduct.....	42
Appendix 9: Annual PSEAH Action Plan.....	44

INTRODUCTION:

Sexual Exploitation, Abuse and Harassment (SEAH) are among the most egregious violations of human rights and dignity, rooted in power imbalances, gender inequality, and misuse of authority. They undermine the core values and credibility of humanitarian and development work, betray the trust of the communities we serve, and inflict lasting harm on survivors, especially women, children, and other marginalised or at-risk groups.

JSUS has a zero-tolerance policy for Sexual Exploitation, Abuse & Harassment (SEAH) and has taken steps to prevent and respond to SEAH in its own operations and in the work of its partners. JSUS has also developed a number of resources to help prevent sexual abuse, support victims of sexual abuse, and create a safe and respectful environment for all. Since its inception, the JSUS has been working relentlessly to incorporate a gender-transformative approach and to eliminate gender discrimination within the organisation and in the community.

This Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy affirms JSUS's zero-tolerance approach to all forms of sexual exploitation and abuse. It applies to all staff, volunteers, partners, contractors, and others engaged in the organisation's activities, whether in humanitarian, development, or any operational context. The policy is grounded in international standards, including the UN Secretary-General's Bulletin (ST/SGB/2003/13), the IASC Six Core Principles, and relevant resolutions and codes of conduct.

JSUS has a responsibility to prevent PSEAH and is committed to ending discrimination among male and female colleagues and all sorts of gender-based discrimination and violence to ensure women's empowerment. To continue this practice, it has formulated a 'Protection from Sexual Exploitation, Abuse and Harassment Policy' in accordance with the Supreme Court's directives, delivered on May 14, 2009.

1. SCOPE

This PSEAH Policy applies to all individuals and entities associated with JSUS, regardless of location or contractual status. This includes but is not limited to:

- Employees (full-time, part-time, permanent, temporary)
- Executive leadership
- Interns, volunteers, and casual labors
- Consultants, contractors, subcontractors, and vendors

- Partners and subrecipients
- Visitors, agents, and other representatives
- Any individual or group who engages with or represents JSUS in any capacity, or comes into contact with communities served by JSUS.

The policy is binding during and outside official working hours, on organisational premises, in the field, during travel, and at any events or locations where organisational work is conducted.

2. PURPOSE & OBJECTIVE

Purpose: The purpose of this Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy is to outline the organisation's commitment to preventing and responding to sexual exploitation, abuse and harassment (SEAH) in all its forms. The purpose of this policy and its associated procedures is to provide clarity to all on how they should engage with children, young people, and vulnerable adults when working for, on behalf of, or in partnership with JSUS. It is also to ensure that employees, volunteers, and other representatives are protected.

Objectives:

a) Prevent SEAH in all forms

- Establish clear behavioural standards and responsibilities for all staff, volunteers, partners, and associates.
- Promote awareness, training, and education on SEAH prevention across the organisation.

b) Protect beneficiaries and vulnerable groups

- Ensure that all program participants, particularly women, children, and persons with disabilities, are safeguarded against SEAH risks.
- Create safe reporting mechanisms and accessible channels for complaints and concerns.

c) Respond effectively to SEAH incidents

- Develop procedures for confidential, survivor-centred handling of reports, including investigation, disciplinary action, and referral to appropriate services.
- Ensure that survivors of SEAH receive timely and appropriate support.

d) Promote a culture of accountability and transparency

- Hold all staff and stakeholders accountable to the policy through monitoring, evaluation, and enforcement mechanisms.
- Include SEAH considerations in organisational risk assessments, program design, and implementation.

e) Align with organisational values and international standards

- Reinforce JSUS's commitment to human rights, equity, and humanitarian principles.
- Align with global frameworks such as the UN Secretary-General's Bulletin (ST/SGB/2003/13), IASC guidelines, and national safeguarding laws.

Alignment with Organisational Goals: The PSEAH Policy directly aligns with JSUS's mission to promote social justice, protect human dignity, and ensure the inclusion and safety of marginalised populations. It strengthens the organisation's capacity to deliver people-centred, ethical, and accountable humanitarian and development services. By integrating PSEAH across its programs, JSUS reinforces its reputation as a rights-based, responsive, and community-led organisation.

3. POLICY PRINCIPLES

This policy is grounded in internationally recognised standards and organisational values. It draws from the Six Core Principles of the Inter-Agency Standing Committee (IASC) and further articulates the JSUS's own commitments to accountability, dignity, and equity in safeguarding practice.

3.1. IASC Six Core Principles on Sexual Exploitation and Abuse

JSUS adopts the Six Core Principles developed by the IASC Working Group on Protection from Sexual Exploitation and Abuse:

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.

3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes the exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefiting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

3.2. Organisational PSEAH Principles

In addition to the IASC principles, JSUS upholds the following six principles to guide all safeguarding efforts:

1) Zero Tolerance

Sexual exploitation, abuse, and harassment are unacceptable in any form. JSUS applies zero tolerance not only to perpetrators but also to those who fail to act or cover up. Every allegation will be taken seriously and acted upon promptly and fairly.

2) Accountable Leadership

Leadership plays a critical role in shaping a culture of safety, respect, and accountability. Leaders are expected to model ethical behaviour, integrate safeguarding into strategic decisions, and champion gender equality and inclusion. Safeguarding must be embedded in governance, operations, and team dynamics at all levels.

3) Survivor-centred Response

The rights, dignity, and recovery of survivors are central to all response actions. Survivors will be treated with empathy and respect, supported in making informed decisions, and provided with access to medical, psychosocial, and legal support as needed. Confidentiality, non-discrimination, and consent are fundamental to this approach.

4) Collective Responsibility

Preventing and responding to SEAH is the shared duty of all staff, partners, contractors, volunteers, and community actors. JSUS promotes a whole-of-system approach, ensuring all stakeholders are informed, trained, and empowered to act. Collaboration across sectors and communities is essential to effective safeguarding.

5) Addressing Inequality and Power Imbalances

SEAH is often rooted in systemic inequalities. JSUS is committed to identifying and addressing power imbalances related to gender, disability, age, ethnicity, and socio-economic status. Promoting inclusion and meaningful participation of marginalised groups helps reduce risk and enhance protection.

6) Transparency and Accountability through Reporting

Effective safeguarding requires accessible, safe, and confidential reporting mechanisms. These systems must be trusted by communities and used to strengthen risk management, track trends, and ensure that perpetrators are held accountable. Reporting is not a procedural formality; it is central to protecting rights and upholding organisational integrity.

4. RESPONSIBILITIES AND ACCOUNTABILITIES

Preventing and responding to sexual exploitation, abuse, and harassment (PSEAH) is a shared responsibility. All individuals involved in the organisation's activities, including staff, volunteers, partners, and beneficiaries, have a role to play in preventing and responding to PSEAH. Specific responsibilities and accountabilities include:

4.1. PSEAH/Safeguarding Focal Persons

The PSEAH/safeguarding Focal Point plays a crucial role in preventing and responding to sexual exploitation, abuse, and harassment (PSEAH) within JSUS. They serve as a central point of contact for all PSEAH-related matters and are responsible for implementing the organisation's PSEAH policy and procedures.

Key Responsibilities of a PSEAH/Safeguarding Focal Point:

- i. Prevention: JSUS will develop PSEAH prevention strategies and a training module to raise awareness of PSEAH issues and promote a culture of respect and mutual understanding among staff, volunteers, partners, and beneficiaries within the organisation.

- ii. Response: JSUS will implement a mandatory PSEAH incident reporting and investigation mechanism. JSUS will conduct investigations, take appropriate actions, and provide support and assistance to the victims and survivors.
- iii. Coordination: JSUS will coordinate with internal and external stakeholders to address PSEAH issues, maintain up-to-date knowledge, and share best practices and resources. It will also ensure that PSEAH is mainstreamed in all organisational levels and at all stages of the project cycle.

Accountabilities of a PSEAH Focal Point:

- i. Confidentiality: Focal Point will maintain confidentiality and protect the identities of victims and alleged perpetrators.
- ii. Impartiality: The Focal Point will manage investigations and avoid conflicts of interest in a fair and impartial manner.
- iii. Timeliness: The Focal Point ensures a quick response to any PSEAH/Safeguarding incidents, Conducting investigations and taking action in a timely manner.
- iv. Transparency: Focal Points will keep victims informed of the progress of investigations and outcomes by sharing regular reports.
- v. Accountability: The Focal Point ensures accountability and effectiveness by responding to and preventing PSAEH/Safeguarding issues and evaluating performance in a timely manner.

4.2. Executive Directors

The Executive Director (ED) plays a crucial role in preventing and responding to sexual exploitation, abuse, and harassment (PSEAH) within the organisation. She/he is responsible for setting the tone for the organisation's culture of respect and ensuring that PSEAH is not tolerated at any level.

Key Responsibilities of an Executive Director on PSEAH:

- i. Leadership and Commitment: The ED will demonstrate a strong personal commitment to preventing and responding to PSEAH and clearly articulate a zero-tolerance policy. He/She will emphasise its importance to all staff, volunteers, partners, and beneficiaries. He /She will consistently uphold the highest ethical standards and demonstrate respect for all individuals.

- ii. **Prevention:** The ED will foster a workplace culture that promotes respect, diversity, and inclusion and where individuals feel comfortable reporting PSEAH incidents. The ED will oversee the development and implementation of a comprehensive PSEAH prevention strategy. The ED will ensure that all staff, volunteers, partners, and beneficiaries receive adequate training on PSEAH prevention and awareness. Nominate a dedicated focal point and ensure he/she has all the support to fulfil the responsibilities.
- iii. **Response:** The ED will establish clear and accessible reporting procedures and ensure the reported matters are promptly and thoroughly investigated. He/she will ensure that proper disciplinary action is taken against perpetrators in accordance with the organisation's policies and provide support and assistance to victims of PSEAH, including counselling, medical care, and other necessary resources.
- iv. **Accountability:** The ED will hold all individuals accountable for their actions to prevent and respond, regularly review the organisation's prevention and response efforts and make adjustments as needed. He/She will also maintain open communication and transparency.

Accountabilities of an Executive Director on PSEAH:

- i. **Fiduciary Responsibility:** The ED will protect the organisation from legal and reputational risks and ensure that the organisation's actions and policies align with its ethical obligations to prevent and respond to PSEAH. He/she will also manage the organisation's resources effectively to support PSEAH prevention and response efforts.
- ii. **Transparency and Accountability:** The ED will be transparent about the organisation's PSEAH prevention and response efforts, including reporting procedures, investigation outcomes, and disciplinary actions and hold themselves accountable for the organisation's performance in preventing and responding. He/She will be open to feedback and suggestions from staff, volunteers, partners, and beneficiaries. regarding PSEAH prevention and response.
- iii. **Continuous Learning and Improvement:** The ED will stay informed about current trends, laws, and best practices in PSEAH prevention and response and encourage and support ongoing training and education for staff, volunteers, partners, and beneficiaries. He/She will regularly evaluate the organisation's prevention and response efforts and make adjustments based on lessons learned and emerging best practices.

By fulfilling these responsibilities and upholding their accountabilities, an Executive Director can play a significant role in creating a safe and respectful workplace for all individuals and effectively addressing PSEAH within the organisation.

4.3. Executive Committee Members

Executive committee members play a crucial role in overseeing the governance and management of an organisation. They are responsible for making strategic decisions, ensuring financial stability, and upholding the organisation's mission and values. Here's a comprehensive outline of their responsibilities and accountabilities:

Responsibilities of Executive Committee Members:

- Strategic Leadership: The EC committee will identify and analyse key trends and emerging issues affecting the organisation and develop and implement the organisation's strategic plan, aligning with the organisation's long-term goals.
- Governance and Oversight: The EC committee will oversee the organisation's governance framework and ensure adherence to legal and regulatory requirements, monitor the organisation's performance, maintain transparency and accountability against its strategic plan and make necessary adjustments.
- Financial Management: The EC will approve the organisation's annual budget and monitor its financial performance, ensure the organisation's financial sustainability and manage its resources effectively.
- Stakeholder Engagement: The EC will maintain strong relationships with key stakeholders, including funders, partners, and beneficiaries, by aligning with the needs and interests and representing the organisation to the public and advocating for its mission.
- Risk Management: The EC will identify, assess, develop and implement risk management strategies and policies which will impact the organisation.
- Compliance and Ethics: The EC will ensure the organisation complies with all applicable laws, regulations, and ethical standards and foster a culture of ethical conduct and accountability by addressing any ethical concerns or violations promptly and effectively throughout the organisation.

Accountabilities of Executive Committee Members:

- Fiduciary Duty: The EC will act in the best interests of the organisation and its stakeholders, prioritise the organisation's mission and long-term sustainability and exercise due diligence in managing the organisation's resources and assets.
- Transparency and Accountability: The EC will be transparent about their decisions and actions to the organisation's stakeholders and hold themselves accountable for their actions and decisions.
- Confidentiality: The EC will maintain the confidentiality of sensitive information belonging to the organisation and its stakeholders and avoid conflicts of interest and disclose any potential conflicts promptly.
- Continuous Learning: The EC will stay informed about current trends, issues, and best practices in the organisation's sector and participate in ongoing education and training opportunities to enhance their skills and knowledge.

By fulfilling these responsibilities and upholding their accountabilities, executive committee members can play a significant role in guiding an organisation towards success, ensuring its financial stability, and upholding its reputation as a responsible and ethical entity.

4.4. Managers (Project/Branch)

Managers play a crucial role in preventing and responding to sexual exploitation, abuse, and harassment (SEAH) in the workplace. They are responsible for creating a safe and respectful work environment where all employees feel valued and protected. Here's a breakdown of their responsibilities and accountabilities:

Responsibilities of Managers in SEAH Prevention:

Managers at JSUS play a critical role in preventing Sexual Exploitation, Abuse, and Harassment (SEAH). Their responsibilities include

- He/She fosters a culture of zero tolerance by setting clear expectations and leading by example.
- She/He must ensure all staff are trained on SEAH prevention policies and procedures, emphasising the importance of safeguarding and ethical behaviour.
- He/She is responsible for identifying risks, implementing preventive measures, and ensuring reporting mechanisms are accessible, confidential, and trusted.
- He/She must respond promptly and appropriately to SEAH allegations, ensuring thorough investigations while respecting confidentiality and fairness.

- He/She must actively support survivors by providing access to counselling, legal assistance, and other necessary services.
- Ensure PSEAH is mainstreamed in all organisational activities and represented in all relevant meetings and forums.

By prioritising these actions, managers uphold JSUS's commitment to a safe and respectful environment for all stakeholders.

Accountabilities of Managers in SEAH Response:

JSUS managers have key accountabilities in responding to SEAH incidents:

- Taking immediate action upon receiving a report.
- Ensuring a confidential and supportive reporting process.
- Conducting impartial and timely investigations.
- Implementing appropriate disciplinary measures for perpetrators.
- Providing necessary support and resources to survivors.
- Collaborating with law enforcement and other relevant agencies.
- Reviewing response procedures to identify areas for improvement.
- Using lessons learned to enhance future prevention efforts.

4.5. Staff (Coordinator/Officers/Other Staff)

- Be aware of the organisation's PSEAH policy and procedures.
- Report any suspected or actual PSEAH incidents to the appropriate authorities.
- Create a safe and respectful environment for all individuals.
- Refrain from any behaviour that could be considered PSEAH.

5. POLICY STATEMENT

In addition to the roles and responsibilities above, the specific provisions of the JSUS Code of Conduct apply to all employees and representatives at all times.

Those related to sexual harassment are:

- Not taking part in any form of abuse, including sexual abuse.
- Not engaging in sexual relations with anyone under the age of 18.

- Not exchanging money, employment, goods or services for sexual favours.

Those related to other forms of discriminatory and disrespectful behaviour are:

- Failing to respect the basic rights of all human beings regardless of gender, disability, ethnicity, religion, caste, language, HIV status and other aspects of identity.
- Acting fairly, honestly and tactfully and treating people with dignity and respect.
- Not taking part in any form of discrimination, harassment, or abuse (physical or verbal), intimidation or exploitation, or in any other way infringing the rights of others.
- Striving for high standards in our work, taking responsibility for our actions and not abusing a position of power as a JSUS representative.
- Not behaving in a way that is likely to bring JSUS into disrepute

Code of Conduct (Do's and Don'ts) for Staff/Volunteers/ Partners /Vendors

Do's:	Don'ts:
• Respect: Treat all individuals with dignity and respect, regardless of their age, gender, ethnicity, religion, or sexual orientation. • Professionalism: Maintain professional boundaries and avoid any behaviour that could be construed as exploitative or abusive. • Confidentiality: Keep all information confidential and only share it with authorised personnel. • Reporting: Report any concerns or suspicions of SEAH to the appropriate authorities immediately. • Training: Participate in all mandatory training on SEAH prevention and response. • Collaboration: Work collaboratively with colleagues and stakeholders to promote a safe and inclusive environment. • Self-Awareness: Be mindful of your own behaviour and its potential impact on others.	• Exploitation: Do not exploit or abuse your position of power or trust. • Harassment: Do not engage in any form of harassment, including sexual harassment. • Discrimination: Do not discriminate against anyone based on their identity or background. • Retaliation: Do not retaliate against individuals who report SEAH concerns. • Inappropriate Relationships: Do not engage in any inappropriate relationships with beneficiaries or colleagues. • Substance Abuse: Do not engage in substance abuse or other activities that could impair your judgment or behaviour. • Negligence: Do not neglect your duties or responsibilities.

6. PREVENTIVE MEASURES

JSUS is committed to proactively preventing sexual exploitation, abuse, and harassment (SEAH) through comprehensive risk mitigation strategies. These measures aim to create a safe and respectful environment for all staff, partners, and communities we serve by embedding SEAH principles into all aspects of our operations. This section outlines the key practices, policies, and capacity-building efforts that minimise risks and promote a culture of accountability and zero tolerance towards SEAH.

6.1. Policy Integration and Accountability

Embedding SEAH prevention principles into JSUS's core governance framework is critical to ensuring a culture of zero tolerance toward SEAH. All organisational policies, codes of conduct, and contractual agreements explicitly incorporate SEAH commitments. This ensures that everyone connected with JSUS—staff, partners, suppliers, and contractors—understands their responsibilities and the consequences of policy breaches. Leadership at all levels, from Board members to supervisors, plays a vital role in promoting and enforcing these standards by modelling appropriate behaviour and holding others accountable. Key actions include:

- Embedding the SEAH policy as an appendix in all memoranda of understanding (MoUs) and consultancy agreements.
- Clearly articulating that breaches of SEAH obligations, including failure to prevent or respond to incidents, will result in contract termination or the end of partnerships.
- Assigning accountability to leadership, including senior management and supervisors, to actively foster and enforce a safeguarding culture.

6.2. Safe Recruitment

Robust recruitment processes are crucial for mitigating the risks posed by individuals who may exploit vulnerable populations. JSUS ensures transparency and a commitment to safeguarding from the outset by setting clear expectations in job advertisements and descriptions. Interviews rigorously assess candidates' knowledge, attitudes, and suitability to work with vulnerable groups, including behaviour-based questioning to evaluate their alignment with organisational values. Additional measures include:

- Requiring candidates to disclose any previous convictions or allegations related to sexual exploitation, abuse, or harassment.

- Conducting comprehensive reference and criminal record checks wherever legally and practically feasible, including checks against databases of individuals barred from working with at-risk groups.
- Implementing probationary periods to observe new hires for any safeguarding concerns, with prompt action taken if necessary.
- Ensuring all recruits sign JSUS's Code of Conduct and SEAH policies prior to commencing work.

6.3. Training and Capacity Building

Awareness and understanding of SEAH responsibilities are reinforced through mandatory training tailored to staff roles and risk exposure. Induction sessions are delivered promptly after hire, covering essential policy elements, reporting mechanisms, and survivor-centred approaches. Refresher courses are provided regularly to keep staff updated on best practices and evolving standards. JSUS commits to:

- Providing initial SEAH training within the first 30 days for all staff, volunteers, interns, partners, and contractors.
- Offering refresher training at least biennially, with specialised programs for roles with higher safeguarding risks, such as program managers, safeguarding focal points, and HR personnel.
- Equipping Safeguarding Managers or Focal Points with advanced skills to handle sensitive cases and oversee policy implementation effectively.
- Training leadership and management teams on their critical role in fostering a culture of safeguarding.

6.4. Awareness Raising and Communication

Effective prevention depends on raising awareness across all organisational levels and the communities served. Communication strategies prioritise inclusivity, accessibility, and cultural relevance to ensure all stakeholders understand acceptable conduct and how to report concerns safely and confidentially. Multiple channels and formats are employed to reach diverse audiences, including those with limited literacy or language barriers. Specific practices include:

- Developing and disseminating culturally appropriate SEAH materials in local languages, using child-friendly and accessible formats.

- Maintaining ongoing internal and external campaigns to reinforce knowledge of behaviours, reporting mechanisms, and organisational commitments.
- Leveraging a wide range of media platforms, including radio, social media, community forums, and printed materials, to maximise reach, especially among vulnerable groups.
- Designing complaint mechanisms in partnership with communities to ensure confidentiality, accessibility, and trustworthiness.
- Adhering to ethical guidelines in media and research involving beneficiaries, protecting dignity, and securing informed consent.

6.5. Risk Assessment

JSUS will implement comprehensive SEAH risk assessments to proactively identify and manage potential vulnerabilities related to sexual exploitation and abuse. These assessments will be conducted at both organisational and programme levels during key stages such as project design, inception, and regular review phases. To ensure a thorough understanding of risks, the assessments will be integrated into JSUS's overall risk management framework. For each identified risk, JSUS will develop a specific mitigation plan, which may include:

- Strengthening supervision and reporting lines.
- Providing targeted training and community engagement initiatives.
- Modifying project delivery methods to minimise risk exposure.

To maintain effectiveness, all mitigation measures will be regularly monitored as part of ongoing project oversight. Senior management and governance bodies will review risk assessments and mitigation actions annually, ensuring responsiveness to emerging threats and feedback from the field. All risk assessments, mitigation plans, and reviews will be fully documented and updated to reflect evolving risks and organisational learning.

6.6. Working with Partners, Contractors, Suppliers and Vendors

JSUS is committed to ensuring that all partners, contractors, and suppliers uphold high standards in preventing and responding to SEAH, particularly those in contact with affected communities.

To support safe and ethical programming, JSUS will:

- Include SEAH clauses in all contracts, requiring compliance with our policy and standards. Breach clauses constitute grounds for termination.

- Build capacity by providing SEAH training or orientation to relevant third-party personnel and including them in internal briefings or training when appropriate.
- Monitor compliance through due diligence and partner selection.

All partner staff working directly with communities must receive SEAH induction and sign a Code of Conduct aligned with JSUS's standards. These measures reinforce our commitment to survivor-centred, safe, and accountable programming across all partnerships.

6.7. Safe Programming and Community Engagement

SEAH risk management is embedded throughout program cycles to ensure activities do not inadvertently expose rights holders or communities to harm. Rights holders, including adults at risk and children, are actively engaged in program design, monitoring, and evaluation to ensure their needs and perspectives are reflected. Attention to intersectional gender and power dynamics informs programming that addresses the root causes of SEAH vulnerabilities. Prevention strategies in programming include:

- Conducting SEAH risk assessments during program design, implementation, and monitoring phases to proactively identify and mitigate potential risks.
- Facilitating safe spaces for women, men, transgender, and gender non-binary individuals to express concerns and participate in decision-making.
- Integrating intersectional feminist analysis to understand and counteract power imbalances that contribute to exploitation risks.
- Establishing community-based complaint and feedback mechanisms accessible to all program participants.
- Building partner capacity in SEAH to ensure safeguarding standards are upheld in joint initiatives.

7. REPORTING AND RESPONSE MECHANISM

JSUS is committed to ensuring that all allegations of Sexual Exploitation, Abuse, or Harassment (SEAH) are taken seriously and handled with utmost sensitivity, confidentiality, and impartiality. This mechanism outlines the channels for reporting concerns and the procedures for timely, safe, and survivor-centred responses.

7.1. Reporting Obligations and Channels

Any affiliated personnel, whether staff members or partners, have the obligation to report SEAH concerns and may face disciplinary measures for failing to do so. For community participants and external stakeholders, reporting SEAH concerns is a right, not an obligation.

Reporting SEAH is mandatory for all JSUS staff. Any employee subjected to SEAH, or any other form of discrimination or disrespectful behaviour, has the right to raise a grievance or complaint and to have it treated seriously, swiftly, sensitively, and confidentially.

All staff, volunteers, partners, and community members are encouraged and entitled to report SEAH concerns through safe, accessible, and confidential options, including:

- Verbal reports to a trained PSEAH focal point, safeguarding officer, or trusted staff member.
- Written reports submitted in person or via the designated PSEAH email address.
- Complaint boxes placed in discreet and safe locations.
- Telephone hotlines, SMS, or WhatsApp lines dedicated to SEAH reporting.
- Referrals from partner organisations or other protection actors.

Anonymous reports will be accepted and handled with equal seriousness. In cases of discrimination or other misconduct not related to SEAH, JSUS will apply the relevant local/national grievance procedures.

Informal Option: For less severe, one-off incidents of misconduct, an employee may choose to address the behaviour directly with the person involved, explaining that it is unwelcome, uncomfortable, or offensive, and that repetition will be considered harassment.

Formal Options: For serious or repeated misconduct, or when informal resolution is inappropriate, employees may:

- Report via the Whistleblowing Policy.
- Report directly to the most senior manager or HR representative in their location.
- Report directly to the Executive Director at JSUS Headquarters.

If a concern is raised verbally, it should be followed up in writing in line with local procedures.

Mandatory Manager Action: Managers and supervisors must:

- Take all SEAH or discrimination complaints seriously, regardless of severity or the individuals involved.
- Immediately report incidents to HR to enable prompt investigation.
- Take steps to prevent retaliation or recurrence during and after the investigation.

Failure to act on known incidents or to report them will be considered a breach of policy

7.2. Survivor-Centred Response

JSUS's response will be guided by the principles of safety, confidentiality, informed consent, non-discrimination, and timeliness.

Survivors will:

- Be given a safe, private environment for disclosure.
- Be interviewed, where possible, by trained personnel of the same gender.
- Be allowed to have a support person present.
- Be empowered to make informed decisions about care and reporting.
- Be referred to medical, psychosocial, legal, and protection services only with their informed consent.
- Retaliation against complainants, witnesses, or investigators is strictly prohibited and will result in disciplinary action.

7.3. Survivor Assistance

Upon receiving a complaint, a designated Safeguarding Officer or Complaints Handling Team will: (i) log and securely store the complaint, and (ii) conduct an immediate risk and safety assessment, prioritising survivor protection. Where GBV Cluster referral pathways already exist, these will be followed. In locations where such pathways are not in place, referral pathways will be mapped and regularly updated to facilitate access to essential services.

JSUS maintains an up-to-date directory of service providers, including:

- Medical care (rape crisis centres, hospitals)
- Mental health and psychosocial support (MHPSS)
- Legal aid and advice
- Child protection services (for cases involving minors)

JSUS prioritises timely and compassionate support:

- **Immediate:** Medical care, psychosocial first aid, safety planning, and secure shelter (if needed).
- **Long-Term:** Ongoing counselling, reintegration assistance, and accompaniment to legal proceedings (if desired).
- **Non-Retaliatio**n Guarantee: Protection from retaliation for complainants, survivors, and witnesses.

All assistance is provided free of charge and with full respect for the survivor's dignity, rights, and wishes. All staff must be familiar with referral pathways relevant to their area of work and how to make sensitive referrals.

7.4. Referral Pathways

JSUS is committed to ensuring timely, safe, and survivor-centred referrals for all allegations of sexual exploitation, Abuse, and Harassment (SEAH). All SEAH reports, regardless of where or how they are received, must be promptly referred to the appropriate internal and/or interagency mechanisms within 24-48 hours of receipt in accordance with established Standard Operating Procedures (SOPs).

Internal Referrals: All JSUS staff, volunteers, and representatives are required to report SEAH concerns immediately through the organisation's designated internal reporting. Upon receipt, the designated staff will ensure that the complaint is referred internally to the appropriate units for victim/survivor assistance and, where appropriate, investigation, always respecting the survivor's informed consent, confidentiality, and safety. All complaints will be handled in accordance with JSUS's internal protocols and disciplinary procedures.

Interagency Referrals: If the alleged perpetrator is affiliated with another organisation, JSUS will refer the complaint to the relevant body of the concerned entity through the interagency referral mechanism established in the country-level PSEAH Standard Operating Procedures (SOPs). This process will be based on informed consent and a risk assessment. In cases where the alleged perpetrator's entity is unknown, or where conflicts of interest exist, JSUS will coordinate with the PSEAH Network or PSEAH Coordinator to determine the appropriate course of action.

7.5. Investigation and Case Management

When an incident of Sexual Exploitation, Abuse or Harassment (SEA) and Child Safeguarding Violation is received, a professional, impartial, and survivor-centric investigation will be carried out to ensure accountability, fairness, and due process for all parties involved with this incident.

Upon receiving a report of Sexual Harassment, Sexual Exploitation (SEA), Sexual Abuse, or a Child Safeguarding Violation, a thorough, impartial, and survivor-centred investigation will be conducted to uphold accountability, ensure fairness, and respect due process for all parties involved.

- i. **Preliminary Assessment:** A safeguarding officer/designated complaints management team member/focal point/filtration team will conduct an initial assessment to determine whether the concern relates to SEA and warrants a formal investigation. This decision will be based on predefined criteria, policies, including the ingredients of the complaint letter, the severity of the allegation, potential risk to the survivor, and available information. The filtration team /safeguarding officer or designated team will recommend an appropriate course of action regarding the reported complaint.
- i. **Notification to the Accused:** After initial fact-finding, the accused person will be formally notified of the allegation in writing. They will be informed of their rights, including the right to respond and to confidentiality. Administrative leave or reassignment may be considered to prevent interference or risk.
- ii. **Formal Investigation:**

Investigations will be conducted by the organisation's designated and certified/trained investigator, or external/interagency investigators, as appropriate, and will follow a defined timeline. The preliminary assessment will be completed within 48 hours of receiving the report, and the full investigation will be concluded within 30 days, unless exceptional circumstances require more time.

- a) The investigation team will assess risk and make an Investigation plan before starting the investigation.
- b) Investigations will follow a survivor-centred approach, be fair and thorough, and maintain due process for all parties involved with the incident.

- c) Interviews will be conducted by a well-trained investigator following due process rights for parties.
- d) The investigation will be time-bound and conclude with a report focusing on allegations supported by evidence or refuted by evidence, and recommendations will come from a higher level that holds hiring and firing authority
- e) If the organisation lacks internal investigation capacity, the SEA Coordinator or interagency mechanisms may be approached to explore shared or external investigative support.
- f) Where the subject of the survivor (SOS) is a child or a person with a disability affecting communication, hearing, or cognition, or needs psychosocial support, external specialists may be engaged to ensure appropriate support and safeguards.

iii. Disciplinary Hearing:

- a) Senior leadership will review the findings of the inquiry and determine appropriate disciplinary or corrective actions.
- b) The survivor will be informed of the outcome in a manner that respects confidentiality and security.
- c) Decisions will be based on the evidence and guided by internal disciplinary procedures.

iv. Documentation and Learning

- a) All cases and outcomes will be documented securely.
- b) Trends and lessons learned will inform policy updates and prevention strategies.

v. Information Sharing with Complainants:

Following the completion of an investigation and the implementation of any disciplinary or corrective measures, relevant information regarding the outcome will be shared with the complainant upon request, in a manner that respects the confidentiality, safety, and privacy of all parties involved.

vi. Appeal:

- a) The Subject of the Complaint (SOC) has the right to appeal the decision within a set timeframe, usually 30 days.
- b) An appeals committee, independent of the original investigation, reviews the appeal and makes a final decision.

Retaliation against complainants, witnesses, or investigators is strictly prohibited. Any such behaviour would amount to disciplinary action.

7.6. Referral to National Authorities

Where appropriate and with the survivor's informed consent, JSUS may refer cases to national authorities for legal action. Such referrals will always prioritise the survivor's safety, confidentiality, and best interests.

8. CONFIDENTIALITY

Confidentiality is a cornerstone of JSUS's commitment to protecting individuals affected by Sexual Exploitation, Abuse, and Harassment (SEAH). Ensuring the security of sensitive information during reporting and investigation processes is critical to safeguarding victims/survivors, witnesses, and the integrity of the case.

a) How Confidentiality Is Maintained

- **Restricted Access:** Only designated, trained personnel (e.g., safeguarding focal points, investigation teams) are allowed access to case-related information on a strict need-to-know basis.
- **Secure Storage of Information:** All case documentation, whether written or electronic, is securely stored with controlled access. Electronic data is password-protected, and physical files are kept in locked cabinets.
- **Informed Consent:** Information is only shared with the victim's/survivor's informed, voluntary consent, except in cases where disclosure is legally required (e.g., to protect a child or prevent further harm).
- **Anonymity Options:** Where possible, survivors and complainants may report anonymously or request the use of pseudonyms to protect their identities.
- **Safe Communication Channels:** JSUS ensures that reports and updates are communicated through safe and confidential means, including private conversations, encrypted messages, and secure email systems.

b) Consequences of Breaches

Breaches of confidentiality are taken extremely seriously by JSUS. The following measures are in place:

- **Disciplinary Action:** Any staff member, volunteer, or partner found to have willfully or negligently breached confidentiality may face disciplinary actions, including suspension, termination, or legal action, depending on the severity of the breach.
- **Accountability:** All personnel involved in SEAH cases are required to sign confidentiality agreements. Breaches will be documented and reviewed to ensure accountability and prevent recurrence.
- **Restorative Support:** In the event of a confidentiality breach affecting a survivor or complainant, JSUS will take all necessary steps to mitigate further harm, including additional psychosocial support and safety planning.

JSUS remains committed to building a culture of trust, respect, and protection, where confidentiality is upheld as a fundamental obligation of all involved in SEAH prevention and response.

9. MONITORING & EVALUATION

Effective implementation of the PSEAH Policy at JSUS requires continuous monitoring, evaluation, and periodic updates. This ensures accountability, improves protection systems, and reinforces a culture of zero tolerance toward sexual exploitation, abuse, and harassment.

Monitoring Implementation and Effectiveness

JSUS will establish a structured Monitoring and Evaluation (M&E) system to assess the implementation of the PSEAH Policy through both qualitative and quantitative indicators. Key metrics include:

- Number of staff trained on PSEAH standards annually.
- Number and type of SEAH reports received and resolved within appropriate timeframes.
- Victim satisfaction with response services, gathered through anonymised feedback (where safe and appropriate).
- Partner compliance with JSUS's safeguarding standards.
- Timeliness of referrals and access to victim support services.

Routine internal audits and spot checks will also be conducted to verify that safeguarding protocols are being followed at all organisational levels.

10. DISCIPLINARY ACTIONS

JSUS maintains a zero-tolerance policy toward any form of sexual exploitation, abuse, or harassment (SEAH). Violations of the PSEAH Policy will trigger disciplinary measures that are firm, fair, consistent, and aligned with national labour laws and organisational HR policies.

a) Appropriate Disciplinary Measures

Disciplinary measures may include, but are not limited to, verbal or written warnings, mandatory retraining, suspension, demotion, termination of employment or contract, and referral to legal authorities where appropriate. Decisions will be made by senior management or a designated disciplinary committee based on the nature and severity of the misconduct, the outcome of the investigation, and relevant organisational policies and procedures.

of the violation:

- Verbal or written warnings for minor infractions.
- Mandatory retraining or reassignment of duties.
- Suspension (with or without pay) during investigation processes.
- Demotion or reassignment if trust is compromised.
- Termination of employment or contract for serious breaches, including confirmed cases of sexual exploitation, abuse, or harassment.
- Legal referral to law enforcement authorities if the conduct violates criminal laws.
- Blacklisting from future engagement with JSUS or its partners.

All disciplinary decisions will be made based on a fair and transparent investigation process, respecting the rights of both the survivor and the accused, including the presumption of innocence until proven otherwise.

b) Compliance with Labour Laws and HR Standards

- JSUS ensures that all disciplinary actions are consistent with the Bangladesh Labour Act, applicable NGO regulations, and international labour and human rights standards.

- The organisation will follow due process, including written notification, opportunity to respond, and appeal mechanisms, as per its internal Human Resource Manual.
- JSUS will also coordinate with local authorities and legal counsel in cases where legal proceedings are necessary.

c) Accountability of Partners and Contractors

All implementing partners, contractors, and service providers are required to adhere to JSUS's PSEAH standards through formal agreements. Failure to comply may result in:

- Immediate termination of contract or partnership.
- Reporting to relevant authorities or donors.
- Public disclosure of misconduct, if appropriate and safe to do so.

JSUS is committed to maintaining a safe, respectful, and protective environment. All personnel must understand that any breach of the PSEAH Policy carries serious consequences, both professionally and legally.

11. TRAINING AND AWARENESS

Training and awareness are essential pillars in the successful implementation of JSUS's PSEAH Policy. By educating all personnel and stakeholders, JSUS ensures a shared understanding of expected behaviour, reporting procedures, and the organisation's zero-tolerance approach to sexual exploitation, abuse, and harassment.

Delivery of Training: JSUS will deliver training using multiple methods tailored to the needs and literacy levels of each group:

- Induction sessions: Mandatory for all new staff, volunteers, and partners at the time of onboarding.
- Regular refresher trainings: At least annually, to reinforce knowledge and update on any policy changes.
- Interactive methods: Role-plays, case studies, video modules, and group discussions to encourage engagement and retention.
- Localised content: Training materials will be provided in Bangla and other relevant local languages, ensuring accessibility and understanding.

- Digital and in-person formats: Depending on location and context, training will be delivered face-to-face or via online platforms (e.g., webinars, e-learning modules).

Target Group: Training on the PSEAH Policy is mandatory for the following groups:

- All JSUS staff, including management, program, support, and field staff.
- Volunteers, interns, and consultants affiliated with JSUS.
- Board members and governing body representatives.
- Partner organisations, contractors, and service providers.
- Community leaders and beneficiaries, particularly those involved in program implementation or oversight (e.g., community-based protection committees, youth volunteers).

Special attention will be given to high-risk roles—such as field workers, protection staff, or staff working with children and marginalised populations. JSUS recognises that knowledge is key to prevention. Therefore, safeguarding training will be embedded in the organisational culture and supported by leadership commitment, regular evaluations, and inclusive feedback mechanisms to continuously improve learning efforts.

12. REVIEW AND UPDATES OF THE POLICY

To ensure the continued relevance, effectiveness, and alignment of the PSEAH Policy with evolving standards and legal requirements, JSUS has established a formal framework for periodic review and updates.

12.1. Responsibility for Policy Review

- The Safeguarding Committee of JSUS, in collaboration with the Human Resources and Legal/Compliance Teams, will be responsible for leading the policy review process.
- The review process will include inputs from program teams, field staff, community members, and partner organisations, ensuring a participatory and inclusive approach.
- The Executive Director will approve the revised policy, following endorsement from the senior management team or governing board.

12.2. Frequency of Review

- The PSEAH Policy will be formally reviewed every two years to assess its relevance, effectiveness, and alignment with best practices.
- Annual internal check-ins will be conducted to identify any immediate gaps or challenges in implementation that may warrant interim updates.

12.3. Triggers for Early Review

In addition to scheduled reviews, the policy may be updated earlier if triggered by:

- Changes in national or international laws, regulations, or donor requirements related to safeguarding or SEAH.
- Internal incidents or lessons learned that highlight gaps in the existing policy.
- Audit findings, evaluation results, or recommendations from safeguarding investigations.
- Feedback from staff or community members indicating confusion, misuse, or lack of clarity in policy provisions.
- Changes in organisational structure, operations, or programming that introduce new SEAH risks.

12.4. Documentation and Dissemination

- All updates and revisions will be clearly documented, version-controlled, and communicated to all JSUS staff, partners, and relevant stakeholders.
- Updated versions of the policy will be shared through induction sessions, refresher trainings, internal communications, and public-facing platforms as needed.

JSUS is committed to keeping its PSEAH Policy dynamic, responsive, and survivor-centred, ensuring that it reflects current realities, risks, and responsibilities across all areas of operation.

13. REFERENCES

A. International Laws and Standards

- a) United Nations Secretary-General's Bulletin: ST/SGB/2003/13 – *Special measures for protection from sexual exploitation and sexual abuse*
- b) The Universal Declaration of Human Rights (1948) – Affirms the rights to dignity, equality, and protection from abuse
- c) The Convention on the Rights of the Child (CRC, 1989) – Emphasises child protection obligations

- d) The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW, 1979)
- e) Core Humanitarian Standard (CHS) on Quality and Accountability, particularly:
- f) Commitment 3: People are safe from harm
- g) Inter-Agency Standing Committee (IASC) Guidelines on PSEA (2002, updated 2018)
- h) Sphere Standards (2018) – Minimum standards for humanitarian response, including protection
- i) ILO Convention No. 190 – *Elimination of violence and harassment in the world of work*
- j) UN Sustainable Development Goals (SDGs) – Especially Goal 5 (Gender Equality) and Goal 16 (Peace, Justice, and Strong Institutions)

B. National Laws and Policies – Bangladesh

- a) The Penal Code of Bangladesh (1860) – Sections on rape, sexual assault, and harassment
- b) The Children Act (2013) – Protection and welfare of children
- c) The Women and Children Repression Prevention Act (2000) – Legal measures for dealing with violence against women and children
- d) The Domestic Violence (Prevention and Protection) Act (2010)
- e) Bangladesh Labour Act (2006) – Provisions related to workplace harassment and employee rights
- f) National Plan of Action on Violence Against Women and Children (2023–2030)

C. Organisational and Donor Requirements

- a) JSUS Human Resources and Code of Conduct Policies
- b) Donor safeguarding policies (e.g., UN, EU, DFID/FCDO, USAID)
- c) NGO Affairs Bureau (NGOAB) compliance regulations, Government of Bangladesh

APPENDICES

Appendix 1: Glossary

- a) **Sex:** The term "sex" can refer to two distinct concepts:

- a) **Biological sex:** Biological sex refers to the characteristics that distinguish an individual as male, female, or intersex. These characteristics are primarily determined by chromosomes, hormones, and anatomy.
- b) **Sexual activity:** Sexual activity refers to any physical act that is intended to arouse or gratify sexual desire. This includes a wide range of behaviours, such as kissing, touching, oral sex, and sexual intercourse.

It is important to note that these two concepts are distinct and should not be conflated. Biological sex is a biological characteristic, while sexual activity is a behaviour. An individual's biological sex does not necessarily determine their sexual desires or behaviour.

- b) **Sexual Abuse:** The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs, etc.). Sexual abuse is a serious violation of human rights that can have devastating consequences for victims. It can lead to physical and emotional trauma, as well as social and economic hardship. Victims of sexual abuse may experience symptoms such as anxiety, depression, post-traumatic stress disorder (PTSD), and difficulty trusting others.
- c) **Sexual Exploitation:** Sexual exploitation is any act that involves the abuse of a position of power or vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another
- d) **Sexual Harassment:** Sexual harassment is unwelcome conduct of a sexual nature, which has the purpose, or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct may occur on a single occasion or on multiple occasions.

Sexual harassment may take the form of unwelcome physical, verbal or non-verbal conduct, which may include - but is not limited to - the following:

- (a) Unwanted physical contact, ranging from touching to sexual assault and rape.
- (b) Verbal forms of sexual harassment including unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed

toward them, unwelcome and inappropriate enquiries about a person's sex life, and sexual orientation, directed at a person or group of persons.

(c) Non-verbal forms of sexual harassment, including unwelcome gestures, whistling, indecent exposure, or the unwelcome display of sexually explicit pictures or objects.

(d) Unwelcome messages of a sexual nature that are sent via email, JSUS, Skype, voice messages and other electronic means, whether using SCI IT/devices or personal mobiles/equipment.

(d) Sexual harassment that is linked to recruitment/employment opportunities, promotion, training or development opportunities, and the offer of salary increments or other employee benefits in exchange for sexual favours.

“Discriminatory and disrespectful behaviour”

Other forms of harassment may relate to a person's gender, marital status, race (including colour, nationality or ethnic or national origin), religion or belief, age or disability and may involve:

Intimidation: the unreasonable use of status or authority to require an individual to perform an action or task which the individual knows to be inappropriate, illegal or in direct conflict with SCI policy or procedures;

or:

Bullying: any offensive, abusive, malicious or insulting behaviour which makes the recipient feel upset, threatened, humiliated or vulnerable.

- e) **Consent:** Informed consent is an ongoing agreement which is freely given based upon a clear appreciation and understanding of the facts, implications and future consequences of an action. To give informed consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of the action. They also must be aware of and have the power to exercise their right to refuse to engage in an action without justification and/or to not be coerced (i.e., being persuaded based on force, coercion or threats, either direct or implied).
- f) **Child Abuse:** Child abuse is a serious and harmful act that can have devastating consequences for a child's physical and emotional well-being. It encompasses any form of behaviour that intentionally or unintentionally endangers a child's safety, health, or development. This can include:

Physical abuse: Hitting, kicking, biting, burning, or any other action that causes physical injury or pain.

Emotional abuse: Insults, threats, intimidation, humiliation, isolation, or any other behaviour that damages a child's emotional well-being.

Sexual abuse: Any sexual contact or exploitation of a child, including unwanted touching, fondling, or forced sexual activity.

Neglect: Failure to provide a child with their basic needs, such as food, shelter, clothing, medical care, or supervision.

Witnessing domestic violence: Children who are exposed to violence between adults in their household are at risk of emotional and psychological harm.

Appendix 2: Incident Reporting Form

Confidential Report of SEA

(All fields need not be filled – the record can still be made with only limited information)

To PSEA Focal Points and supervisors: Please complete this form to the best of your knowledge and ability, and ensure that it is submitted in a timely manner.

Summary:

Provide a brief summary of the incident, type of SEA (and whether it involves a child, the services provided to the complainant and what actions have been taken to protect the complainant, whistleblowers and witnesses. Include basic information on the alleged offender and whether an investigation into the incident has been opened. Include an assessment of the risks of repeat offences and what preventive measures have been put in place.

I. Information about Complainant

Name of Complainant:

Contact details (including address, phone and email):

Age: Sex or gender identity: Nationality:

If the Complainant is a child, has the parent or legal guardian been informed about the incident?

Sex	or	gender	identity:
Nationality:			
IV. Complainant assistance			
Ensure a survivor-centred approach, which has the following guiding principles for the care of survivors of sexual and gender-based violence: 1. Consent 2. Confidentiality 3. Safety 4. Respect 5. Non-discrimination. If the Complainant is a child, ensure appropriate child protection measures and referrals are in place. Does the Complainant need and want medical assistance, or has s/he sought treatment and, if so, where and from whom? Which other services has the Complainant already received assistance from or would need help accessing? Who is responsible for ensuring a safety plan for the Complainant? Describe any security measures put in place for the Complainant Describe any referrals and advice about assistance provided to the Complainant, including health, psychosocial, police and safe house. Ensure the Complainant has access to appropriate and timely forensic services, where relevant.			
V. Reporter assistance if different to the Complainant (Victim/Survivor)			
If the Reporter is an employee of an organisation, does she/he have access to adequate whistleblower protections within their organisation? Describe any protection and security measures put in place for the Reporter			
VI. Protection of witnesses			
Provide details of any witnesses, their protection needs and any security measures put in place for witnesses.			
VII. Risk of the alleged offender repeating the alleged offense			

Outline the risks of the alleged offender repeating the alleged offence

Is there a risk for other members of the affected population/community?

What measures have been put in place to prevent further alleged offences?

Outline any protection concerns for the alleged offender.

VIII. Additional information

Date complaint/report first received and by whom:

Does the Complainant/Reporter know about IFRC's process for handling complaints?

Has the Complainant consented to sharing the complaint with the alleged offender?

Any information should be shared with the involved parties as part of a formal investigation.

SEA Report completed by:

IX. Provide any other relevant information

Only as needed and appropriate

Name, date and location:

Appendix 3: Referral Form

INTER-AGENCY COMPLAINTS REFERRAL FORM (SEXUAL EXPLOITATION, ABUSE AND HARASSMENT)

Information in this form is CONFIDENTIAL.

Name of complainant:

Nationality:

Address (district/street/city):

Contact details (phone/email):

Age:

Gender:

How does the complainant prefer to be contacted: <i>(Check relevant box(s) and give details)</i> ☐ Phone ☐ Email ☐ Other		Preferred time of day for contact (day/night):	Preferred language:
Name of survivor: <i>(If not the complainant)</i>		Nationality:	
Address (district/street/city):		Contact details (phone/email):	
Age:	If under 18: ☐ With family ☐ Unaccompanied ☐ Separated	Gender:	
Name(s) and address of parent/guardian, if under 18:			
Has the survivor given consent to the completion of this form and referral? ☐ Yes ☐ No ☐ Don't know			
Date of incident(s):	Time of incident(s):	Location of incident(s):	
Description of incident(s) in the words of the survivor/complainant:			

Name of alleged perpetrator:	Address of alleged perpetrator (if known):
Organisation alleged perpetrator works for:	Job title of alleged perpetrator:
Age:	Gender:
Physical description of alleged perpetrator:	
Any urgent needs identified for the survivor/complainant, including safety concerns? Please explain.	
Has the survivor been referred to an organisation for assistance? Please explain.	
Have the police or other relevant authorities been contacted by the victim? Please explain.	
Any other information/details:	
Report completed by:	
Date:	

Appendix 4: TOR for Investigators

JSUS PSEA Investigator – Terms of Reference

To be adapted based on operational context, internal policies, and in-country coordination mechanisms

Background

Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) is a core commitment of JSUS. Investigations into allegations of SEAH must be conducted promptly, safely, and fairly, with a survivor-centred approach. These Terms of Reference outline the expected roles and responsibilities of a PSEAH Investigator engaged to support investigations within JSUS.

Objective

To conduct timely, impartial, and survivor-centred investigations into allegations of SEAH in line with JSUS policies, international standards, and in coordination with relevant in-country mechanisms and entities.

Reporting Line

The PSEAH Investigator reports to the JSUS Head of Safeguarding (or designated PSEAH focal point), with accountability to JSUS senior management.

Key Responsibilities

1. Investigation Management

- Lead or support administrative investigations into SEAH allegations involving JSUS personnel or partners.
- Prepare investigation plans, timelines, and interview schedules.
- Ensure adherence to JSUS guidelines, due process, and victim-centred principles.

2. Information Collection

- Conduct interviews with complainants, witnesses, and subjects in a safe and respectful manner.
- Review relevant documentation and gather corroborating evidence.
- Maintain accurate, confidential, and secure records of all investigative materials.

3. Reporting & Case Closure

- Draft detailed investigation reports including findings, analysis, and recommendations.
- Submit reports to the designated JSUS decision-making authority within agreed timelines.
- Participate in internal case review discussions when required.

4. Coordination

- Coordinate with JSUS safeguarding, legal, HR, or protection teams.
- Refer survivors to appropriate victim assistance services, in line with JSUS SOPs and survivor consent.
- Support inter-agency referrals in accordance with agreed information-sharing protocols.

5. Compliance & Ethics

- Uphold the highest standards of professionalism, ethics, and confidentiality.
- Ensure investigations are impartial, free from conflict of interest, and culturally sensitive.
- Comply with data protection laws and JSUS internal security protocols for case management.

Qualifications and Experience

- Proven experience conducting investigations, preferably on SEAH or safeguarding cases.
- Training in investigation techniques, survivor-centred approaches, and interview skills.
- Strong understanding of humanitarian principles and PSEAH frameworks.
- Fluency in relevant languages and strong written reporting skills.

Duration & Review

This ToR applies for the duration of the investigator's assignment and will be reviewed at the end of the engagement or upon request of the appointing body.

Appendix 5: Risk Assessment Template

Date of Risk Assessment	
Name of the Project	
Name of Partner	
Donor(s)	
Name of Project Manager	

		Impact		
		L	M	H
Likelihood	H-3			
	M-2			
	L-1			

Risk Assessment							Risk Management				
Project Activity	Identify Risks	Analysis of Risk Factors	Existing Control Measures	Risk Calculation			Actions Required to Mitigate the Risk	By Whom	Risk Calculation		
				Likelihood	Impact	Risk Level			Likelihood	Impact	Risk Level

Appendix 6: Service Mapping

SL	Name of organisation	Services	Address	Email and Phone no
1	A	Legal Aid Services		
2	B	Victim Support Services		

Appendix 7: TOR for the PSEA Focal Points**Terms of Reference: PSEA Focal Point****Background & Purpose:**

Protection from Sexual Exploitation and Abuse (PSEA) is a key priority of JSUS. The PSEA

Focal Point supports the organisation's efforts to prevent and respond to sexual exploitation and abuse (SEA) by ensuring implementation of Protection from Sexual Exploitation and Abuse (PSEA) measures. The Focal Point acts as the internal and inter-agency liaison on PSEA and promotes a survivor-centred, confidential, and accountable approach.

Key Responsibilities

1. Prevention and Capacity Building

- Promote awareness of SEAH among staff, partners, and communities.
- Support induction and ongoing training of staff on PSEA and Codes of Conduct.
- Collaborate with HR to ensure PSEA is integrated into recruitment, performance, and disciplinary processes.

2. Safe Reporting and Complaints Handling

- Help ensure accessible, safe, and confidential channels for reporting SEA.
- Receive SEA complaints and ensure timely internal referral in line with organisational procedures.
- Maintain confidentiality and share information on a strict need-to-know basis.

3. Survivor Support and Referrals

- Coordinate with GBV/Child Protection actors to ensure victims are referred to appropriate services.
- Ensure support is available regardless of whether a formal investigation is pursued.

4. Internal Coordination

- Support development and monitoring of a PSEA Action Plan.
- Advise senior management on institutional responsibilities and progress.
- Participate in PSEA network meetings and contribute to inter-agency coordination.

5. Monitoring and Reporting

- Track and compile anonymised SEA data for internal learning and reporting.
- Support periodic reviews and reporting on PSEA implementation.

Qualifications

- Mid/senior-level staff with decision-making access.
- Knowledge of SEA, gender, and protection principles.
- Strong communication, interpersonal, and confidentiality skills.
- Fluency in English and knowledge of local languages is an asset.

This ToR aligns with global PSEA standards and is subject to periodic review by the Cox's Bazar PSEA Network.

Appendix 8: Code of Conduct

Purpose, Scope and Application

JSUS is committed to upholding the highest moral and ethical standards and ensuring the quality and sustainability of its work.

This Code of Conduct applies to JSUS staff and associates, including partner staff, consultants, volunteers, interns, suppliers, and anyone else associated with JSUS. Its purpose is to outline the expected standards of behaviour for all staff and associates. In making this clear, it also aims to reduce the likelihood of misplaced or malicious allegations. While relevant international human rights and safeguarding standards, as well as local laws, must be respected at all times, where this Code is stronger than those provisions, this Code shall be followed.

The Code applies at all times, both inside and outside of work. Any breaches of this Code are grounds for disciplinary action. This includes the suspension of staff or termination of their individual employment contracts, as well as the suspension or termination of contracts for services or partnership agreements, including those without payment.

This Code of Conduct complements JSUS's Safeguarding Policy.

Managers should review this Code of Conduct for relevance at least every two years, or sooner if necessary. A signed Code of Conduct will remain in place until the termination of the contract or agreement, unless it is updated.

Culture and values

As an employee of JSUS, I agree to:

- Support and embody the vision and mission of JSUS in every aspect of my work.
- Apply this Code of Conduct 24 hours a day, seven days a week, whether I am inside or outside of work, and whether I am within operational areas or not, as I am a representative of JSUS at all times and in all places. My behaviour must never bring the organisation into disrepute, create a conflict of interest, or compromise the organisation and its aims.
- Carry out my duties to the best of my ability with honesty, integrity, a sense of responsibility and respect for the systems, policies and procedures that are in place at JSUS.
- Treat everyone fairly with respect, defend human dignity, and contribute to a workplace culture of equal respect and mutual accountability that does not tolerate or stay silent in the face of abuse of power.
- Bring to the attention of managers/safeguarding focal points (or other appropriate staff member if not comfortable with them) any incident of abuse or concern which breaches this

Code of Conduct that has been either witnessed by me, that I suspect, or that has been experienced by me, using the designated reporting channels.

Behaviour expectations

As an employee of JSUS:

- I will not sexually exploit, abuse or harass any staff member, project participant or community member associated with the project, including children.
- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief around a child's age is not a defence.
- I will not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance.
- I will not have any type of sexual or otherwise intimate relationship with project participants, recognising the inequality in the relationship.
- I will not engage in any criminal or commercial exploitation, including using child labour even at home, or using supply chains that traffic women, children or other vulnerable adults.
- I will not bully, harass or discriminate against anyone on the basis of their personal characteristics and identity, including but not limited to their ethnicity or race, religion, disability, age, civil or other status (e.g. refugee, single parent and so forth), gender identity, sexual orientation or others.
- I will not work under the influence of illegal substances, nor have illegal substances within my possession, on a project or on JSUS property.
- I will not use the IT equipment/mobile phones and other property to cyberbully anyone, to obtain and/or share data without express permission from the person the data refers to, or to view sexually explicit and/or inappropriate material. This includes any inappropriate images, including those of children (pornography).
- I will not physically assault a child or vulnerable adult.
- I will not emotionally or psychologically abuse a child or vulnerable adult.
- I will not accept significant gifts or bribes from interested stakeholders who may be seeking to influence the project/work.
- I will not seek to employ any family members or personal acquaintances, or benefit from any contracts, but rather always disclose conflicts of interest.
- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so.

[illegible]

Complaints and reports

- If I have a complaint or concern about a breach of the Code, I understand that I should report it immediately to [INSERT INFORMATION]. If I do not feel comfortable reporting to this person (for example, if I believe the report will not be taken seriously or if that person is implicated in the concern), I understand that I may report to any other appropriate staff member.
- I understand that if I receive a report or have concerns, I am obliged to refer immediately as per the JSUS [INSERT complaints policy and procedures name].

I agree to abide by the above Code of Conduct and acknowledge that any breach of it may result in termination of my/my organisation's contract.

Name/Signature: _____ Date: _____

Appendix 9: Annual PSEAH Action Plan**Annual PSEAH Action Plan**

To uphold a zero-tolerance approach to SEAH by strengthening systems, enhancing awareness, and ensuring safe, survivor-centred reporting and response mechanisms.

Activity	Description	Responsible Person/Unit	Timeline	Output/Indicator


Yeasmin Parvin
 General Secretary & Executive Director
 Jugantar Samaj Unnayan Sangstha (JSUS)


MD. Rafiqul Alam
 President
 Jugantar Samaj Unnayan Sangstha (JSUS)