



Safeguarding Policy

Jugantar Samaj Unnayan Sangstha (JSUS)



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1. INTRODUCTION

The Safeguarding Policy is a critical framework for Jugantar Samaj Unnayan Sangstha (JSUS), established to protect all individuals especially children, women, persons with disabilities, and other vulnerable groups from abuse, exploitation, neglect, and harm in the context of the organization's work. This policy is necessary because JSUS operates in humanitarian and development settings where vulnerable populations may be at heightened risk. It ensures that all staff, volunteers, and partners uphold the highest standards of behaviour and accountability to maintain trust and safety within the communities JSUS serves.

JSUS was founded with the vision of a society where all people enjoy their fundamental rights in a corruption-free, just, and secure environment. Rooted in this vision, the organisation prioritises patriotism, justice, gender sensitivity, non-communal values, and the preservation of health, education, environment, and biodiversity. This safeguarding policy aligns with JSUS's mission to address the root causes of injustice and social exclusion, especially among disadvantaged and marginalised populations, by promoting respect, protection, and empowerment.

The policy reflects JSUS's core organisational values of dignity, respect, accountability, inclusion, and justice. It reinforces the commitment to zero tolerance for abuse or misconduct and promotes a culture of transparency, responsiveness, and survivor-centred protection. JSUS acknowledges that freedom of thought, cooperation, and tolerance are essential to a safe and inclusive work culture, and integrates these principles across all its programs.

Ultimately, the intent of the Safeguarding Policy is to create a safe and inclusive environment for all stakeholders by preventing harm, ensuring early reporting, and enabling effective response mechanisms, upholding the rights, well-being, and voices of those most at risk. Everyone associated with JSUS, whether staff, partner, or volunteer, is responsible for creating and maintaining environments that prevent abuse and empower individuals to speak up without fear.

2. SCOPE OF THE POLICY

This Safeguarding Policy applies to all individuals who are engaged with or represent Jugantar Samaj Unnayan Sangstha (JSUS) in any capacity. This includes:

- All full-time and part-time staff
- Volunteers, interns, and fellows
- Board members and governing body representatives
- Consultants, contractors, and service providers


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- Partner organisations and community-based groups working directly with JSUS

The policy applies to all organisational activities, projects, and programs, regardless of location, with particular emphasis on work that involves direct interaction with children, women, people with disabilities, and other at-risk or marginalised groups.

It is applicable across all geographic regions where JSUS operates, including both Rohingya camps and host communities in Cox's Bazar, as well as in any other districts or humanitarian response settings in Bangladesh or abroad where JSUS engages in project implementation.

This policy is enforced in all environments, including:

- JSUS offices and field sites
- Community centres, schools, and health facilities
- Online or digital platforms used for program delivery or communication
- Any travel or representation conducted on behalf of JSUS

All individuals covered by this policy are expected to adhere to its principles and standards at all times, ensuring the safety, dignity, and rights of those JSUS seeks to serve.

3. PURPOSE AND OBJECTIVES

Purpose: The purpose of this Safeguarding Policy is to establish a strong framework that protects all individuals, especially children, women, persons with disabilities, and other vulnerable groups, from any form of abuse, exploitation, neglect, or harm in connection with JSUS's programs and operations. The policy aims to promote a culture of safety, accountability, and respect throughout the organisation and its activities.

Objectives:

- Prevent Harm and Abuse:** To proactively identify and reduce risks of abuse, exploitation, and misconduct across all areas of JSUS's work.
- Promote a Safe and Inclusive Environment:** To ensure that all project sites, offices, and community spaces are safe, inclusive, and uphold the dignity and rights of all individuals, especially those most at risk.
- Establish Clear Standards of Conduct:** To set clear expectations for the behaviour of staff, volunteers, partners, and affiliates, and ensure accountability through codes of conduct and disciplinary measures.


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d) Enable Reporting and Response Mechanisms: To provide safe, confidential, and accessible channels for reporting safeguarding concerns, and to ensure timely and appropriate responses, including support for survivors.

e) Build Organisational Capacity: To ensure all staff and stakeholders are trained, aware, and equipped to implement safeguarding principles in their daily work and interactions.

Alignment with JSUS Goals: This policy directly supports JSUS's organisational goals of promoting dignity, equity, and human rights, and aligns with its mission to empower marginalised communities. By safeguarding the people, we serve, JSUS strengthens community trust, ensures ethical program delivery, and fulfils its commitment to do no harm.

4. POLICY PRINCIPLES

The Safeguarding Policy of JSUS is rooted in core ethical values and principles that guide all actions, decisions, and behaviours of the organisation and its stakeholders. These principles ensure that safeguarding is not only a legal obligation but a moral and organisational commitment to uphold human dignity and rights.

4.1. Do No Harm

Safeguarding measures are carefully designed and implemented to prevent further harm. JSUS actively identifies risks in all its activities and takes steps to mitigate them, protecting the affected communities.

The principle of Do No Harm is fundamental to JSUS's safeguarding commitment. We will carefully assess the potential impacts of our activities, programs, and presence on individuals and communities, particularly those who are vulnerable or marginalised. We will take proactive steps to prevent any physical, emotional, psychological, social, or economic harm, whether direct or indirect, that may arise from our operations or relationships.

We recognise that harm can sometimes occur unintentionally, for example, by reinforcing power imbalances, exacerbating existing inequalities, or triggering social tensions. To address this, we commit to conducting thorough context and risk analyses during program design and implementation to identify and mitigate such risks effectively.

Embedding safeguarding measures throughout all stages of program planning, delivery, and evaluation is central to our approach. We ensure that our services remain safe, accessible, and respectful of the rights and dignity of all individuals. By creating a culture of awareness, vigilance, and continuous improvement, we strive to prevent abuse, exploitation, and neglect. Ultimately, our commitment to the Do No Harm principle guarantees that JSUS's efforts contribute positively

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to the well-being of the communities we serve and never become a source of further vulnerability or suffering.

4.2. Zero Tolerance

JSUS adopts a zero-tolerance approach to all forms of abuse, exploitation, harassment, and neglect. Any allegation will be treated seriously, investigated promptly, and addressed with appropriate action.

4.3. Respect for Human Dignity and Rights

Every individual, regardless of age, gender, disability, ethnicity, religion, or background, has the right to be treated with dignity and respect. This policy ensures that all interactions protect the inherent rights of the people we serve.

4.4. Inclusion and Non-Discrimination

JSUS promotes an inclusive environment that values diversity and actively works against all forms of discrimination. Safeguarding efforts prioritise marginalised and vulnerable groups, ensuring equitable access to protection and services.

4.5. Accountability and Transparency

All staff, partners, and representatives of JSUS are accountable for upholding safeguarding standards. The organisation is committed to open communication, transparent decision-making, and learning from safeguarding incidents to improve practices.

4.6. Child-Centred and Survivor-Centred Approach

The best interests of the child or survivor are paramount. All safeguarding actions respect the survivor's right to safety, confidentiality, informed consent, and support, ensuring their agency and dignity throughout the process.

4.7. Participation and Empowerment

JSUS values the voices and perspectives of community members, especially children, women, and persons with disabilities. The policy encourages active participation in developing safe and responsive environments.

4.8. Confidentiality and Data Protection

All safeguarding concerns, reports, and investigations are handled with strict confidentiality. Information is shared only on a need-to-know basis and in accordance with legal and ethical standards.

4.9. Victim/survivor-centred Approach:

JSUS will ensure that all safeguarding prevention and response measures place the rights, wishes, needs, safety, dignity, and wellbeing of victims/survivors at the centre. We will act with respect, empathy, and confidentiality; avoid harm, discrimination, and retaliation; seek informed

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consent before sharing information or taking action; provide appropriate support and services; and keep victims/survivors informed and involved in decisions that affect them. For child victims/survivors, actions will follow the "best interests of the child" principle under the UN Convention on the Rights of the Child.

5. ROLES AND RESPONSIBILITIES

Effective implementation of the Safeguarding Policy depends on clearly defined roles and responsibilities across all levels of the organisation. Each staff member, volunteer, and partner shares the responsibility of upholding a safe, respectful, and protective environment.

I. Executive Director/Senior Management:

- Provide strategic leadership and ensure the policy is fully integrated into the organisation's operations and culture.
- Ensure adequate resources, training, and staffing are in place for safeguarding.
- Respond promptly to serious safeguarding concerns and ensure legal or disciplinary action where necessary.

II. Safeguarding Focal Point (SFP) / Committee:

- Serve as the designated first point of contact for safeguarding concerns and reports, receiving information and ensuring it is promptly referred to the appropriate internal or external mechanisms.
- Coordinate and support awareness-raising, training, and policy implementation activities across the organisation.
- Monitor safeguarding risks, maintain accurate and secure records, and ensure all documentation complies with confidentiality and data protection requirements.
- Facilitate access to appropriate support services for survivors, ensuring timely and safe referrals in line with their wishes and the organisation's procedures, without undertaking roles beyond their professional capacity.

III. Program Managers/Project Coordinators:

- Ensure safeguarding measures are incorporated into program design, implementation, and monitoring.
- Train field teams and community partners on safeguarding practices and reporting procedures.
- Supervise staff to ensure compliance with the Code of Conduct and safeguarding standards.

IV. All JSUS Staff, Volunteers, and Interns

- Understand and comply with the Safeguarding Policy and Code of Conduct.


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- Attend mandatory safeguarding orientation and refresher training.
- Report any suspected or actual safeguarding incident or breach immediately, using designated reporting channels.
- Act in a way that protects children, vulnerable adults, and community members from harm at all times.

V. Human Resources (HR)

- Integrate safeguarding checks into recruitment, such as background checks and references.
- Ensure safeguarding responsibilities are included in job descriptions and performance evaluations.
- Support disciplinary action in the event of safeguarding violations.

VI. Partner Organisations and Contractors

- Must agree to comply with JSUS's Safeguarding Policy or demonstrate that they have an equivalent policy in place.
- Participate in safeguarding briefings and reporting protocols.
- Report concerns or incidents as per agreed procedures.

VII. Community Members / Beneficiaries

- Encouraged to participate in awareness sessions about their rights and safeguarding mechanisms.
- Given access to confidential, safe, and accessible channels for reporting concerns.
- Treated with dignity and supported throughout any safeguarding process involving them.

VIII. Reporting Lines:

- All safeguarding concerns must be reported immediately to the Safeguarding Focal Point or, if unavailable, to a senior manager or Executive Director.
- Reports can also be submitted anonymously through JSUS's confidential reporting system or complaints mechanism, if available.
- All reports will be handled promptly, confidentially, and in line with survivor-centred principles.

6. POLICY STATEMENTS

JSUS is committed to ensuring the safety, dignity, and well-being of all individuals it serves and works with. The following policy statements outline specific commitments, actions, and behavioural standards expected of all staff, volunteers, and associates.

6.1. NGO Responsibilities

JSUS will:


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- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with JSUS. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.

6.2. General Commitments

- a) **Zero Tolerance:** JSUS maintains zero tolerance for any form of abuse, exploitation, harassment, or neglect.
- b) **Prevention First:** Safeguarding risks must be identified and addressed at every stage of programming.
- c) **Survivor-Centred Response:** All responses to safeguarding concerns will prioritise the needs, wishes, and safety of the survivor.
- d) **Mandatory Reporting:** All safeguarding concerns must be reported immediately, regardless of the status or seniority of the person involved.
- e) **Confidentiality and Data Protection:** All reports and case information will be handled sensitively, respecting privacy and confidentiality.

6.3. Expected Behaviours (Do's)

All staff, volunteers, and representatives of JSUS must:

- I. Treat all individuals with dignity, equality, and respect.
- II. Maintain appropriate physical, emotional, and professional boundaries.
- III. Always seek informed consent before taking photographs or collecting personal information.
- IV. Promote an inclusive environment free from discrimination or marginalisation.
- V. Report any safeguarding concerns or breaches of this policy immediately to the Safeguarding Focal Point.
- VI. Support and cooperate with safeguarding investigations in a transparent and respectful manner.
- VII. Participate in mandatory safeguarding training and refresher sessions.


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VIII. Take proactive steps to create child-safe and gender-sensitive program environments.

6.4. Prohibited Behaviours (Don'ts)

The following actions are strictly prohibited under this policy:

A. Child Safeguarding

Personnel must not:

1. Physically, emotionally, or sexually abuse or exploit a child (anyone under 18 years of age) under any circumstances.
2. Engage in any sexual activity with a child; mistaken belief of age is not a defence.
3. Engage in any commercially exploitative activities with children, including child labour or trafficking.
4. Sleep in the same bed or private room with a child, even with the child's or caregiver's consent.
5. Use personal digital communication channels (e.g., private social media messages) to contact children.
6. Neglect the duty of care for children under their supervision or protection.

B. Adult Safeguarding

Personnel must not:

1. Physically, emotionally, or sexually abuse or exploit any adult, especially vulnerable adults (including those with disabilities, elderly persons, or those in dependent situations).
2. Engage in sexual relationships with beneficiaries or vulnerable adults due to the inherent power imbalance.
3. Use personal digital communication channels to contact vulnerable adults inappropriately.
4. Sleep in the same bed or private room with a vulnerable adult under their care, even with consent.
5. Neglect the duty of care for adults with special needs or others in their protection.

C. PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment)

Personnel must not:

1. Engage in any sexual exploitation or abuse of any person under any circumstances.
2. Exchange money, employment, goods, or services for sex or sexual favours.
3. Engage in sexual relationships with beneficiaries or vulnerable persons where a power imbalance exists.
4. Harass, intimidate, bully, humiliate, threaten, or discriminate against anyone based on gender, age, race, religion, disability, caste, sexual orientation, or any other identity.
5. Use offensive, harmful, or inappropriate language or gestures.

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6. Use organisational platforms or devices to access or share inappropriate, pornographic, or exploitative content.
7. Use alcohol or harmful substances while engaged in work-related activities involving children or vulnerable persons.
8. Conceal or fail to report any suspected safeguarding concern, SEA incident, or breach of this policy.

Consequences of Breach: Any breach of this policy will result in disciplinary action, up to and including termination of employment or contract. JSUS may also report violations to appropriate legal authorities, where necessary. Partner organisations that fail to comply with safeguarding standards may have their agreements suspended or terminated.

7. PREVENTIVE MEASURES

To proactively prevent abuse, exploitation, and harm, JSUS implements a range of preventive strategies designed to minimise risks across all areas of its operations, programs, and partnerships.

7.1. Recruitment and Vetting

Recruitment is a critical safeguard. JSUS will ensure all recruitment and onboarding processes minimise the risk of hiring individuals who may pose a threat to children, vulnerable adults, or program participants. This commitment extends to staff, volunteers, consultants, and any associated personnel.

To this end:

- a) Job descriptions must include safeguarding responsibilities and reference the organisation's Code of Conduct.
- b) Job advertisements will clearly reflect our zero-tolerance policy toward abuse and exploitation.
- c) All shortlisted candidates will sign a self-declaration stating that they have no prior record of criminal activity, abuse, or misconduct.
- d) Interviews will assess attitudes toward safeguarding and working with vulnerable groups.
- e) Reference checks will inquire specifically about the candidate's behaviour and any prior safeguarding concerns.
- f) Where required, background verification and police checks will be conducted before final appointments.

Safeguarding expectations will be reinforced at the point of contract signing, and adherence will be monitored during employment.


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7.2. Training and Capacity Building

- Provide mandatory safeguarding training for all new staff, volunteers, and partners during onboarding.
- Conduct refresher training annually, tailored to specific roles (e.g., field staff, program managers, Safeguarding Focal Points).
- Raise awareness in communities on safeguarding rights, reporting mechanisms, and the organisation's zero-tolerance policy.

7.3. Code of Conduct

- Require all JSUS staff, volunteers, and partners to sign and adhere to a Code of Conduct that outlines acceptable and prohibited behaviour.
- Display summaries of the Code of Conduct in offices and field locations in local languages.

7.4. Safe Program Design

Safeguarding must be integrated into the design and planning of all programs, services, and activities. During the design phase, program teams must anticipate potential safeguarding risks, especially for high-risk groups, and take preventive action from the outset.

This includes ensuring that:

- a) Site selection, community engagement, aid delivery, field activities, and travel are all assessed for safeguarding implications.
- b) Participants are selected using fair and inclusive processes that avoid placing individuals at risk of harm.
- c) Communication with and about participants is respectful, protective, and consent-based.
- d) Budgeting and activity planning explicitly include safeguarding measures such as safety protocols and awareness materials.

Program teams must continuously uphold the "Do No Harm" principle and remain accountable for ensuring safety throughout project implementation.

7.5. Community Awareness and Participation

Prevention also involves empowering communities and beneficiaries to understand safeguarding, recognise violations, and access reporting systems. JSUS is committed to raising awareness among those we serve to help maintain a safe and respectful environment. Program participants will be informed about expected staff behaviour and the ways to report any misconduct, using community-friendly tools such as posters, leaflets, group sessions, or community radio. Special efforts will be made to ensure that children, women, persons with disabilities, and other at-risk


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groups receive this information in formats and languages that are accessible to them. Feedback from communities will be actively encouraged and used to strengthen safeguarding practices. By embedding these preventive strategies across its operations, JSUS aims to build a culture of safety, accountability, and respect. Prevention is not a one-time intervention but a sustained organisational commitment that must be practised at every level.

7.6. Safe Reporting Mechanisms

- Establish confidential, accessible, and survivor-friendly reporting channels, such as suggestion boxes, hotline numbers, or in-person reporting to designated staff.
- Train staff and focal points on how to receive and respond to disclosures in a sensitive and supportive manner.

7.7. Partnership Compliance

- Ensure that all partner organisations are oriented on JSUS's Safeguarding Policy or demonstrate they have equivalent safeguards in place.
- Include safeguarding clauses in all Memorandums of Understanding (MoUs), subgrants, and contracts.

7.8. Monitoring and Accountability

- Regularly monitor program sites and review staff behaviour and practices through field visits and feedback systems.
- Conduct periodic safeguarding audits and integrate safeguarding into performance appraisals and project evaluations.

7.9. Safeguarding and social media

Digital platforms present new challenges for safeguarding, especially when working with children, adolescents, and vulnerable adults. [JSUS] expects all staff and associates to uphold the same professional and ethical standards online as they do in physical spaces. Key expectations include:

- Keeping personal and professional accounts clearly separate.
- Avoiding private communications with children or vulnerable adults on personal messaging platforms or social media.
- Not posting, sharing, or engaging with any content (text, video, image, emoji, or audio) that is discriminatory, harassing, humiliating, or exploitative.
- Respecting individuals' rights to privacy, and never sharing identifying details or images of participants without formal consent.
- Complying with national laws and organizational policies in all online communications.


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8. REPORTING AND RESPONSE MECHANISM

JSUS is committed to providing safe, accessible, and confidential channels for reporting safeguarding concerns and ensuring timely, survivor-centred responses. All staff, volunteers, beneficiaries, and community members are encouraged and expected to report any actual or suspected breach of the Safeguarding Policy.

8.1. Reporting Channels

Anyone can report a safeguarding concern through one or more of the following confidential channels:

Reports can be made through multiple, complementary channels to ensure accessibility and trust:

Line Management: Staff are encouraged to report safeguarding concerns first to their immediate line manager, who is responsible for taking prompt action to stop any abuse and escalating the matter through the appropriate organisational channels.

Designated Safeguarding Focal Point(s): For situations where reporting via line management is not possible or safe, individuals can report directly to designated safeguarding focal points or officers, who are trained to handle concerns in a confidential and professional manner.

Confidential Hotline and Email: JSUS provides a dedicated 24/7 confidential hotline and email address for reporting safeguarding concerns anonymously or with protected identity.

Whistleblowing Channel: For reports involving misconduct or violations by senior staff or management, a whistleblower mechanism is in place to ensure concerns can be raised safely without fear of retaliation.

All reports will be treated with the utmost confidentiality, and the identity of complainants and survivors will be protected to the fullest extent possible. JSUS follows a victim-centric approach, ensuring that survivors are treated with dignity, respect, and sensitivity throughout the reporting, investigation, and resolution process. Support services, including medical care, psychosocial support, and legal assistance, will be made available or facilitated as needed.

Confidentiality and Protection of Reporters

- All reports will be treated with strict confidentiality.
- Whistleblowers and survivors will be protected from retaliation.
- Information will only be shared on a need-to-know basis to ensure a safe and fair process.

8.2. Steps for Investigation and Response

Receipt of Report

- The Safeguarding Focal Point logs the complaint and provides immediate acknowledgement.


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- Urgent cases involving immediate risk are escalated to senior management within 24 hours.

Initial Assessment

- A preliminary risk and credibility assessment is conducted to determine the nature and seriousness of the allegation.
- Protection and support needs of the survivor are identified (e.g., medical, legal, psychosocial support).

Referral to Authorities: Where applicable and in accordance with local laws and survivor consent, cases will be referred to national law enforcement or child protection authorities to ensure legal action and protection.

Inter-Agency Collaboration: If relevant, JSUS will coordinate with other organisations and agencies through established referral mechanisms to provide comprehensive support and ensure consistent safeguarding standards.

Investigation

- An impartial and trained investigation team is assigned.
- The investigation is conducted following JSUS's safeguarding procedures and national legal requirements.
- All parties are interviewed in a respectful and safe manner, ensuring the survivor's rights are prioritised.

Decision and Disciplinary Action

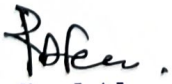
- Based on the findings, disciplinary or corrective action may include suspension, termination, or legal referral.
- Actions are taken in line with organisational HR and legal frameworks.

8.3. Follow-up and Survivor Support

- Ongoing support is provided to the survivor, including referrals to protection services if needed.
- The case is reviewed for organisational learning and preventive improvement.

Investigation Procedure:

Upon receiving a safeguarding complaint, JSUS will initiate a prompt, confidential, and impartial investigation and send an incident report to the relevant development partner, as required by the contract. Investigations will be conducted by appropriately trained personnel, which may include a designated safeguarding committee, HR staff, or external experts, depending on the organisation's internal capacity and structure. Any implicated individuals and concerned programme personnel will be excluded from the process.


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The investigation team will conduct a fact-based inquiry and submit a written report, marked confidential, within three weeks, unless an extension is justified. The safety and well-being of the complainant will be prioritised, and necessary support services will be facilitated. Based on the findings, appropriate disciplinary or corrective actions will be recommended and executed by HR or senior leadership.

Both the complainant and the subject of the complaint (SOC) will be informed of the outcome, with the right to appeal within 30 days. The provision of appeal will depend on the organisation's capacity. Retaliation is strictly prohibited, and all documents will be securely stored for legal and policy reference

8.4. Record-Keeping and Documentation

All reports and investigations are securely documented and stored. Data is anonymised when used for reporting, learning, or compliance purposes.

8.5. Non-Retaliation

JSUS strictly prohibits any form of retaliation against individuals who report safeguarding concerns in good faith. Disciplinary action will be taken against anyone found intimidating or retaliating against a reporter or survivor. This mechanism ensures that all safeguarding concerns are handled fairly, promptly, and in a manner that prioritises survivor safety, organisational accountability, and transparency.

9. CONFIDENTIALITY

Maintaining confidentiality is essential to protect the safety, dignity, and rights of survivors, whistleblowers, and others involved in safeguarding cases. JSUS is committed to treating all reports and related information with utmost sensitivity.

a) Confidential Handling of Information

- Reports will be handled strictly on a need-to-know basis.
- Only designated staff will access sensitive information.
- Survivor identities will remain confidential unless consent is given or disclosure is legally required.

b) Secure Documentation and Storage

- All safeguarding records will be securely stored with restricted access.
- Identifiable details will be anonymised in reports and summaries.

c) Informed Consent and Communication

- Survivors will be informed about how their information is used and who may access it.
- Consent will be obtained before sharing data, unless safety concerns require otherwise.


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d) Breach of Confidentiality

- Unauthorised sharing of information is a serious violation.
- Breaches may lead to disciplinary or legal action.

e) Staff Responsibilities

- All personnel must uphold confidentiality.
- Individuals involved in cases may be required to sign confidentiality agreements.

By ensuring confidentiality, JSUS fosters trust and prioritises the protection and well-being of all individuals involved.

10. MONITORING AND EVALUATION

JSUS is committed to regularly assessing the effectiveness of its Safeguarding Policy to ensure continuous improvement in protecting individuals from harm and upholding the highest standards of safety and accountability.

10.1. Monitoring Mechanisms

Regular Reporting: The Safeguarding Focal Point will maintain a confidential database of all safeguarding reports, investigations, and outcomes, tracking the number, type, and resolution status of cases.

Key Performance Indicators (KPIs): Metrics such as:

- Number of safeguarding incidents reported vs. resolved.
- Percentage of staff and partners trained on safeguarding.
- Timeliness of response to reported concerns.
- Level of community awareness and access to reporting channels.

Feedback Systems: Anonymous surveys and feedback mechanisms will be used to gauge staff and beneficiary perceptions of safety and trust in safeguarding processes.

Field Monitoring: Periodic visits and audits by senior management or safeguarding committees to program sites to observe adherence to safeguarding standards.

10.2. Evaluation

Annual Safeguarding Review: An annual comprehensive review will be conducted, analysing data collected, lessons learned, and any systemic challenges or gaps.

Stakeholder Consultations: Engage staff, beneficiaries, partners, and community representatives in discussions to assess the policy's relevance, effectiveness, and cultural appropriateness.

Incident Analysis: Review patterns or trends in safeguarding incidents to inform risk mitigation and prevention strategies.

10.3. Accountability


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The Executive Director and Safeguarding Focal Point are responsible for ensuring that monitoring activities are conducted as scheduled. Findings and recommendations from monitoring and evaluations will be reported to senior management for informed strategic decisions.

11. DISCIPLINARY ACTIONS

Any violation of this safeguarding policy will be treated as a serious breach of organisational conduct. Disciplinary actions will be determined by HR, in consultation with senior leadership and/or the designated safeguarding committee, based on the severity and nature of the violation, and in compliance with JSUS's HR policies. The process will follow a fair and impartial investigation, upholding due process for all parties involved.

Possible disciplinary measures include:

- Verbal warning
- Written warning
- Suspension (with or without pay)
- Demotion or reassignment of duties
- Termination of employment or contract
- Suspension pending investigation
- Performance improvement plan or close monitoring
- Referral to national authorities or police (as required by law and with survivor consent)
- Permanent disqualification from roles involving contact with program participants

Appeals against disciplinary actions may be submitted to an independent body (e.g., Ombudsperson), which will review the fairness and proportionality of the process and outcome.

Referral to National Authorities: Referral to law enforcement or judicial authorities when the breach involves criminal conduct.

11.1. Procedure

All disciplinary actions will follow a fair and transparent process, respecting the rights of the accused, including the opportunity to respond to allegations. Investigations will be conducted impartially and confidentially, ensuring a fair and due process. Outcomes of investigations and disciplinary decisions will be documented and securely stored.

11.2. Compliance with Labour Laws

JSUS ensures that all disciplinary measures comply with national labour laws, employment contracts, and collective bargaining agreements where applicable. The organisation will seek


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legal counsel when necessary to ensure that disciplinary actions align with local regulations and human rights standards.

11.3. Zero Tolerance for Severe Violations

JSUS maintains a zero-tolerance policy for severe breaches such as sexual abuse, exploitation, or any form of violence. Such cases will result in immediate suspension and, if substantiated, may lead to termination and legal prosecution.

By enforcing these disciplinary measures, JSUS reinforces its commitment to safeguarding and creating a safe workplace and community environment for all.

12. TRAINING AND AWARENESS

JSUS recognises that effective safeguarding depends on well-informed and vigilant staff, volunteers, partners, and community stakeholders. Continuous training and awareness-raising are essential to embed safeguarding principles into all aspects of the organisation's work. Training ensures that all individuals understand their roles and responsibilities in preventing and responding to safeguarding concerns. It builds knowledge on identifying risks, appropriate conduct, reporting mechanisms, and survivor-centred approaches. Awareness programs promote a culture of respect, accountability, and safety across all levels of JSUS and within the communities it serves.

Training Delivery Methods

- **Orientation Sessions:** Mandatory onboarding training for all new staff, volunteers, interns, and partners.
- **Workshops and Seminars:** Interactive sessions covering safeguarding basics, policy updates, and practical scenarios.
- **Refresher Courses:** Annual or bi-annual refresher training to reinforce key concepts and share lessons learned.
- **E-learning Modules:** Online courses for flexible, ongoing learning, especially for remote staff.
- **Community Awareness Campaigns:** Information sessions, printed materials, and media outreach to educate beneficiaries and local leaders on safeguarding rights and reporting channels.

Target Audience

- All JSUS Employees and Volunteers: Regardless of position or location.
- Board Members and Senior Management: To ensure leadership commitment and accountability.
- Partner Organisations and Contractors: To align safeguarding standards across collaborations.

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- Community-Based Staff and Local Stakeholders: Including community leaders, protection committees, and beneficiary representatives.
- Interns and Consultants: Engaged in any JSUS-related activities.

By investing in comprehensive training and awareness, JSUS empowers everyone involved to actively contribute to a safe and protective environment, minimising risks and responding effectively to safeguarding concerns.

13. REVIEW AND UPDATES

To ensure that the Safeguarding Policy remains relevant, effective, and aligned with evolving standards and contexts, JSUS commits to a structured process for regular review and timely updates.

Responsibility for Policy Review

- The Safeguarding Focal Point (SFP) is primarily responsible for coordinating the review process.
- The Senior Management Team provide oversight and approves any revisions.
- Input will be sought from staff, partners, beneficiaries, and safeguarding experts.

Frequency of Review

A comprehensive review of the policy will be conducted every two years as a standard practice. Interim reviews may be conducted more frequently as needed.

Triggers for Review

The policy will be reviewed and updated promptly when any of the following occur:

- Significant changes in national or international laws related to safeguarding, child protection, or labour standards.
- New international guidelines or best practices (e.g., updates from the UN, UNICEF, or donor requirements).
- Following a major safeguarding incident or audit that reveals gaps or lessons learned.
- Changes in the organisational structure, scope of work, or operating contexts.
- Feedback from staff, beneficiaries, or partners indicating the need for clarification or improvement.

Communication of Updates

- Any amendments to the policy will be formally communicated to all JSUS staff, volunteers, partners, and stakeholders.
- Updated versions will be made accessible through official channels, including the organisational intranet, offices, and partner briefings.


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- Refresher training will be provided following significant updates to ensure understanding and compliance.

14. ASSOCIATED POLICIES AND REFERENCES

Associated Policies

- PSEAH Policy
- Code of Conduct
- HR Policy
- Gender and Inclusion Policy
- Anti-corruption Policy
- Incident Reporting and Response Guidelines
- Whistleblowing Policy

References

- 1) United Nations Convention on the Rights of the Child (UNCRC), 1989
<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>
- 2) Universal Declaration of Human Rights, 1948
<https://www.un.org/en/about-us/universal-declaration-of-human-rights>
- 3) United Nations Sustainable Development Goals (SDGs), 2015 – especially Goal 5 (Gender Equality) and Goal 16 (Peace, Justice and Strong Institutions)
<https://sdgs.un.org/goals>
- 4) UN Women and UNDP – Women, Peace and Security Agenda (UNSCR 1325 and subsequent resolutions)
<https://www.un.org/womenwatch/osagi/wps/>
- 5) Inter-Agency Standing Committee (IASC) Guidelines on Protection from Sexual Exploitation and Abuse (PSEA), 2015
<https://interagencystandingcommittee.org/iasc-task-team-prevention-and-response-sexual-exploitation-and-abuse-psea>
- 6) Core Humanitarian Standard on Quality and Accountability (CHS), 2014
<https://corehumanitarianstandard.org/>
- 7) Bangladesh Children Act, 2013
<https://www.unicef.org/bangladesh/en/child-protection-laws-bangladesh>
- 8) Bangladesh Penal Code, 1860 (relevant sections on child protection and sexual offences)
<https://bdlaws.minlaw.gov.bd/act-10.html>


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- 9) International Labour Organization (ILO) Conventions on Child Labour and Forced Labour
<https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/child-labour/lang--en/index.htm>

10) JSUS Code of Conduct and Ethics

APPENDICES

Appendix 1: Glossary

To ensure clarity and consistency, the following key terms are defined as used in this policy:

- a) **Safeguarding:** Safeguarding refers to the measures taken to protect people, especially children, vulnerable adults, and at-risk groups, from harm, abuse, exploitation, and neglect. It includes proactive policies and practices that ensure the safety, dignity, and well-being of all individuals in the care or contact of JSUS.
- b) **Child:** As defined by the United Nations Convention on the Rights of the Child (UNCRC), a child is any person under the age of 18 years, regardless of the legal age of adulthood in national legislation.
- c) **Abuse:** Abuse includes all forms of physical or mental violence, injury, neglect, maltreatment, or exploitation. It can be:
 - i. **Physical Abuse:** Deliberate use of physical force that causes harm.
 - ii. **Emotional or Psychological Abuse:** Actions that damage a person's emotional well-being or self-esteem.
 - iii. **Sexual Abuse:** Involvement of a person in sexual activity without their consent or understanding.
- d) **Neglect:** The failure to provide necessary care or protection, resulting in harm or risk of harm.
- e) **Exploitation:** Exploitation involves the abuse of power or trust to benefit from the vulnerability of others, particularly for sexual, economic, or political gain. It includes sexual exploitation, child labour, trafficking, and forced marriage.
- f) **Sexual Exploitation and Abuse (SEA):** As per UN standards, SEA refers to:
- g) **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes.
- h) **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- i) **Vulnerable Adult:** A person aged 18 or above who may be unable to take care of or protect themselves from harm or exploitation due to age, disability, illness, or social circumstances.


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- j) **Perpetrator:** An individual or group who commits or threatens to commit acts of abuse, exploitation, or harm.
- k) **Survivor:** A person who has experienced abuse, exploitation, or harm. JSUS adopts a survivor-centred approach, ensuring dignity, respect, and agency in all responses.
- l) **Duty of Care:** The legal and moral obligation to ensure the safety and well-being of those we work with or serve, especially children and vulnerable populations.
- m) **Code of Conduct:** A set of rules outlining the expected standards of behaviour for all JSUS staff, volunteers, and partners. Breaches of the Code are subject to disciplinary action.

Appendix 2: Code of Conduct

- A detailed outline of expected behaviours and standards for all staff, volunteers, and partners.

Appendix 3: Safeguarding Reporting Form

- A simple, confidential template for documenting safeguarding concerns or incidents.

Appendix 4: Safeguarding Incident Response Flowchart

- Step-by-step guide illustrating the reporting, investigation, and resolution process.

Appendix 5: Safeguarding Risk Assessment Template

- Tool to identify, assess, and mitigate safeguarding risks in projects or activities.

Appendix 6: Confidentiality Agreement for Staff and Volunteers

- Agreement forms that staff and volunteers sign to commit to maintaining confidentiality in safeguarding matters.

Appendix 7: Training Curriculum and Materials Outline

- Overview of safeguarding training topics, session plans, and participant handouts.

Appendix 8: Community Awareness Materials Samples

- Examples of posters, flyers, or leaflets used to raise awareness about safeguarding and reporting mechanisms.

Appendix 9: Contact List of Safeguarding Focal Points and External Referral Services

- Names, roles, and contact details of designated safeguarding staff and relevant external support organisation.


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