

**Policy  
on  
Prevention and Response to Sexual Exploitation and Abuse (PSEA)**



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## Table of Contents

1. Background and Introduction .....	1
2. Aims and objectives of the policy.....	2
3. Definitions under the PSEA Policy.....	2
4. Scope and Applicability of the PESA Policy .....	4
4.1. Policy Framework.....	4
4.2. Responsibilities of BSFF Personnel:.....	4
4.3. Responsibilities for Third-Party Personnel: .....	4
4.4. Separate Policy for Internal Harassment:.....	5
4.5. Commitment: .....	5
5. BSFF Key Guiding Principles for Preventing and Responding to Sexual Exploitation and Abuse (SEA).....	5
6. Policy Provisions .....	6
6.1. Preventive Provisions.....	7
6.2. Response Provisions .....	9
7. Implementation, Monitoring, and Review .....	11
Annexes.....	12
Annex 1: Sample Incident Report Form .....	12
Annex 2: Code of Conduct on PSEA.....	16
Annex 3: Mapping of legal aid and human rights organizations for referral services.....	17
Annex 4: Sample oath of confidentiality .....	18

## 1. Background and Introduction

Sexual exploitation and abuse (SEA) stand as some of the most egregious forms of sexual and gender-based violence, violating the universally recognized human rights of survivors in numerous ways. Although women and children, especially adolescent girls, face a heightened risk of gender-based violence, poor and marginalized men and boys are also susceptible to SEA. The repercussions of gender-based violence, including SEA, reverberate throughout society as a whole. SEA perpetrated by humanitarian workers can occur in any humanitarian or development setting. However, the risk escalates in emergency contexts characterized by violence, significant power imbalances, mass displacement, restricted access, disrupted family and social structures, and intensified gender and social inequalities. Incidents of SEA by aid workers-whether they are humanitarian or development staff, volunteers, or peacekeepers-represent a catastrophic failure to protect individuals of all gender identities, disabilities, and backgrounds within the affected communities.

Those who commit SEA harm the very individuals they are mandated to assist and protect, potentially destabilizing organizations dedicated to upholding the rights of poor and vulnerable populations. These ethical breaches erode public trust, tarnish the reputations of aid organizations, and jeopardize the credibility and funding of all humanitarian agencies. While SEA is not a new issue, it has gained increased public attention following media revelations of misconduct within several humanitarian agencies. In response, the international community, including the United Nations, has launched various initiatives to address the deficiencies in existing mechanisms aimed at preventing such abuses.

The Bangladesh Shrimp and Fish Foundation (BSFF), a non-profit organization, was established in 2003 under the Trust Act 1882 and later registered with the Directorate of Social Welfare Services in Dhaka in 2008 (Registration No. DHA08488). In July 2023, it was registered with the Registrar of Joint Stock Companies and Firms (Registration No. S-14040/2023). BSFF's core mission is to support the fisheries and aquaculture industries in Bangladesh, focusing on growth, sustainability, and market access. It aims to harness the sector's full potential, contributing to national efforts in poverty reduction, food security, improved livelihoods, women's empowerment, gender equality, and youth inclusion, particularly in coastal areas affected by salinity.

The Bangladesh Shrimp and Fish Foundation (BSFF) is also deeply concerned about the persistent prevalence and growing evidence of sexual and gender-based violence in armed conflicts, disasters, and other emergencies, recognizing that these occurrences harm affected individuals and contravene the core values of the BSFF.

The Bangladesh Shrimp and Fish Foundation (BSFF) declares a zero-tolerance policy on the issue of sexual exploitation and abuse (SEA). BSFF reaffirms that SEA committed by its personnel against affected populations constitutes gross misconduct. Such actions will lead to disciplinary measures, including immediate termination of employment and, when appropriate, referral for criminal prosecution. BSFF also acknowledges the importance of collaborating closely with various stakeholders, state authorities, and other partners, to address SEA issues and ensure the rights and care of survivors.



## 2. Aims and objectives of the policy

The aim of the Policy on Prevention and Response to Sexual Exploitation and Abuse (PSEA Policy) for the Bangladesh Shrimp and Fish Foundation (BSFF) is to ensure that BSFF upholds the highest standards of personal and professional conduct by respecting the rights and dignity of the individuals they seek to assist. BSFF also strives to strengthen its reputation among affected populations as a safe and trusted organization, fostering a culture of transparency and accountability in addressing SEA issues.

### The specific objectives of this policy are:

1. To provide clear policy guidance for BSFF leadership and implementation teams at all levels, ensuring they understand their specific roles and responsibilities in safeguarding beneficiaries from SEA.
2. To establish robust mechanisms for preventing and responding to SEA, ensuring effective and prompt remedial services for affected individuals, and holding all BSFF personnel, including volunteers and associated persons, accountable.
3. To reinforce accountability systems to protect SEA survivors, BSFF and third-party personnel, or anyone reporting SEA cases from retaliation, and to ensure that reporting any suspicion of SEA is safe and feasible.

## 3. Definitions under the PSEA Policy

- **Affected Persons:** Individuals who seek or benefit from BSFF's protection or assistance. This includes any person in the communities or areas where BSFF operates.
- **BSFF's Internal Rules:** Refers to the Staff Rules, Staff Regulations, and annexes, including the Code of Conduct, as well as any other applicable BSFF rules, regulations, and policies.
- **BSFF Personnel:** Refers to any individual serving BSFF, including members, board members, staff, interns, volunteers, consultants, contractors, subcontractors providing services, partners, and any other persons interacting with the community while working with or representing BSFF.
- **Code of Conduct:** A set of standards outlining the behavior that all BSFF personnel are required to adhere to.
- **Community-Based Complaints Mechanisms (CBCM):** Trusted channels through which community members can safely report complaints and seek assistance. These mechanisms engage the community, allowing individuals to report grievances, including SEA incidents, confidentially and safely, ensuring appropriate follow-up.
- **Complainant:** An individual who reports an allegation of SEA according to established procedures. This person may be the SEA survivor or someone aware of the misconduct. Both the survivor and the complainant (if different) should be protected from retaliation. In cases of conflict of interest between the survivor and another party, the survivor's wishes must be prioritized, especially if there's a risk of further harm.
- **Sexual and Gender-Based Violence (SGBV) versus SEA:** SGBV is an umbrella term for harmful acts perpetrated against a person's will, based on gender differences. It

includes physical, sexual, and mental harm, threats, coercion, and liberty deprivations. SEA is a form of SGBV, as victims of SEA are often targeted due to their vulnerable status.

- **Prevention and Response to Sexual Exploitation and Abuse (PSEA) Policy:** Policies, rules, and actions designed to prevent BSFF personnel from engaging in SEA and to respond effectively when such incidents occur.
- **Retaliation:** Any detrimental action recommended, threatened, or taken in response to someone being a victim of or reporting SEA. Retaliation can include denial of aid, adverse administrative actions, verbal abuse, harassment, and other negative actions affecting employment conditions.
- **Safeguarding:** The responsibility of organizations to ensure their staff, operations, and programs do no harm to children and vulnerable adults, and do not expose them to risks of harm and abuse. Safeguarding encompasses PSEA and child protection, typically excluding sexual harassment among staff.
- **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature by force or under coercive conditions. This includes sexual activity with anyone under 18 or those benefiting from BSFF's services or programs.
- **Sexual Exploitation:** The abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically. This includes transactional sex, solicitation of such, and exploitative relationships.
- **Sexual Exploitation and Abuse (SEA):** Refers collectively to acts of sexual exploitation and abuse as defined above.
- **Sexual Harassment:** Any unwelcome sexual advance, request for sexual favor, or conduct of a sexual nature between BSFF personnel. This differs from SEA, which involves affected persons or community members, whereas sexual harassment occurs among staff and volunteers within the organization.
- **Subject of the Complaint:** The alleged perpetrator of SEA once a complaint has been filed.
- **Survivor:** An individual who has experienced or was the target of an attempt of SEA. This term emphasizes strength and resilience and applies to anyone reporting SEA against themselves.
- **Third-Party Personnel:** Individuals employed by a third party and made available to BSFF through a service agreement, without being BSFF personnel.
- **Whistleblower:** An individual who reports a suspected breach of BSFF's Internal Rules based on a reasonably held suspicion of wrongdoing.
- **Whistleblowing Policy:** An organizational policy that encourages staff to report suspicions of misconduct by colleagues or the organization, protecting whistleblowers from negative repercussions for reports made in good faith.



#### **4. Scope and Applicability of the PESA Policy**

**This policy applies to all BSFF personnel, including:**

- Staff members (permanent, temporary, contract)
- Interns
- Volunteers
- Consultants
- Contractors
- Subcontractors providing services to BSFF
- Partners of BSFF
- Any other individuals or groups representing BSFF while interacting with communities

##### **4.1. Policy Framework**

This PSEA policy is intended to be read alongside other relevant BSFF policies and mechanisms, such as:

- Human Resources Policy and Service Rules
- Code of Conduct
- Child Protection Policy
- Policy/Guidelines on Community Engagement and Accountability Mechanisms

##### **4.2. Responsibilities of BSFF Personnel:**

- All BSFF personnel are expected to familiarize themselves with this PSEA policy and its contents.
- They must uphold the highest ethical standards and refrain from engaging in any form of sexual exploitation or abuse.
- They must report any suspected incidents of SEA to the designated reporting channels promptly.
- They must cooperate with any investigations into alleged SEA incidents.

##### **4.3. Responsibilities for Third-Party Personnel:**

For consultants, contractors, and subcontractors, a standard PSEA clause will be included in agreements between BSFF and these parties. This clause will clearly outline the BSFF PSEA policy and the responsibilities of the third-party personnel associated with them.

Similarly, BSFF grant agreements with implementing partners will include a clause mandating their commitment to preventing SEA and protecting beneficiary communities.

#### 4.4. Separate Policy for Internal Harassment:

This policy focuses specifically on preventing and addressing SEA within the context of beneficiaries and communities. Issues of sexual harassment between BSFF personnel will be addressed through a separate policy or a dedicated framework within the existing BSFF gender policy.

#### 4.5. Commitment:

BSFF is firmly committed to preventing Sexual Exploitation and Abuse (SEA) and creating a safe and respectful environment for all beneficiaries, communities, and personnel. We recognize the importance of clear policies, robust reporting mechanisms, and continuous improvement efforts to uphold the highest ethical standards in our work.

### 5. BSFF Key Guiding Principles for Preventing and Responding to Sexual Exploitation and Abuse (SEA)

These principles will guide all BSFF measures to prevent and respond to SEA. All BSFF personnel involved in implementing this policy must adhere to these established principles.

- **Safety and Well-being, Do No Harm:** The primary concern will be ensuring the safety and well-being of survivors throughout the process. This includes reporting, investigation, and victim assistance. BSFF will follow the "do no harm" principle throughout its programming to minimize opportunities for SEA in communities. No action will be taken if it worsens the situation for a survivor.
- **Informed Consent and Respect:** Survivors (or their legal guardians for children) have the right to free and informed consent throughout the process. BSFF will respect the survivor's choices, wishes, rights, and dignity.
- **Confidentiality:** Strict confidentiality will be maintained for complainants, survivors, and other relevant parties. This includes all SEA-related information, identities, and personal details.
- **Equality and Non-discrimination:** Recognizing that SEA often stems from gender inequality, BSFF will ensure equal and fair treatment for anyone affected by SEA involving BSFF personnel. Both the survivor and the subject of the complaint will receive fair treatment.
- **Child Protection:** In addition to the above, BSFF will prioritize child participation in decisions that affect them. The best interests of the child will be the primary focus when making decisions on their behalf, and their specific needs will be addressed. The BSFF child protection policy will be applied alongside this PSEA policy in cases involving children. Child protection specialists will be consulted regarding care for children involved.
- **Transparency:** To ensure transparency, BSFF will develop a clear reporting process and conduct awareness programs on SEA. These programs will highlight reporting channels and complaint redressal mechanisms for both communities and BSFF



personnel. BSFF will also provide feedback to complainants and survivors on the development and outcome of their cases.

- **Accessibility:** The complaint mechanism must be accessible to all potential complainants. BSFF will provide clear information on how to access the mechanism, making the process accessible to the largest possible number of people. This includes identifying and using culturally accepted and context-appropriate entry points for reporting. To facilitate reporting and avoid stigma, anonymous reports will be taken seriously.

## **6. Policy Provisions**

The Bangladesh Shrimp and Fish Foundation (BSFF) incorporates relevant national and international instruments and best practices on Prevention and Response to Sexual Exploitation and Abuse (PSEA). BSFF adopts a survivor-centered integrated approach to prevent and address SEA, prioritizing the rights and dignity of victims regardless of the alleged perpetrator's affiliation. If reported perpetrators are not BSFF personnel, and with the survivor's consent, BSFF will contact their employer to investigate and assist the survivor. If the perpetrator's identity or workplace is unknown or undisclosed, BSFF will support the survivor and refer them to vetted local assistance providers in line with PSEA inter-agency practice.

BSFF implements coordinated and system-wide interventions in all areas and phases of its programming and service delivery, whether in emergencies or normal situations. This includes integrating PSEA into recruitment and staff management, raising awareness and building capacity among all BSFF personnel and communities about the policy and redress mechanisms, integrating PSEA into program/project design and implementation, enforcing PSEA requirements with partners, suppliers, and contractors, enhancing existing community-based complaints mechanisms, institutionalizing internal complaints and investigation procedures, providing assistance and support to survivors, and implementing, monitoring, and reviewing the policy. BSFF actively engages in PSEA inter-agency networks to coordinate and harmonize prevention and response efforts, provide information about locally available services to survivors/victims, and facilitate collaboration with local health, social, and law enforcement authorities to ensure access to safe services and justice.

**This section presents the policy provisions in four main subsections:**

- 1) Preventive Provisions
- 2) Response Provisions
- 3) Other Assistance and Support Services
- 4) Implementation, Monitoring, and Review



## **6.1. Preventive Provisions**

### **6.1.1. Staff Recruitment and Management**

To ensure BSFF recruits' personnel with adequate knowledge and sensitivity about PSEA and manages staff effectively in fulfilling their roles and responsibilities on PSEA, the following measures will be integrated into staff recruitment and management:

#### **Staff Recruitment:**

- All job advertisements will explicitly mention organizational PSEA commitments.
- Interviews (both written and oral) will include questions on PSEA.
- At least two references will be obtained from previous employers, including questions on the candidate's conduct and behavior, particularly regarding PSEA issues.
- Criminal records checks will be conducted.
- The Code of Conduct on PSEA and the organizational Code of Conduct will be included in the contract signing package, and new employees will be required to sign these codes of conduct along with the main employment contract.
- References to PSEA will be included in other associated policies and guidelines, such as the youth policy, community engagement and accountability guidelines, and communication policy, to ensure visibility across the organization.

#### **Staff Management:**

- PSEA-specific responsibilities of staff will be included in job descriptions.
- Performance reviews will include a section on adherence to the PSEA policy and associated code of conduct, and performance management discussions will cover understanding of PSEA and provide an opportunity to raise concerns, ensuring scoring/grading on this issue.
- Implementing 360° feedback for staff performance, where both managers and subordinates can provide feedback on staff performance, including breaches of the code of conduct.

### **6.1.2. Awareness Raising and Capacity Building of BSFF Personnel**

BSFF will implement a comprehensive package for raising awareness and building the capacity of its personnel regarding the PSEA policy and code of conduct, ensuring that PSEA is integrated into regular management processes.

#### **Induction/Training/Awareness Materials:**

- Incorporate PSEA into the induction and training curriculum.
- Provide PSEA induction training to all BSFF personnel at all levels, including support staff, drivers, and guards.
- Develop an online course on PSEA and make it mandatory for all personnel, encouraging staff to complete the IFRC online training on this issue.

- Ensure that all staff receive at least a half-day training session on PSEA, focusing on recognizing and responding to risks and concerns, understanding their roles and responsibilities according to the BSFF PSEA policy.
  - **For new staff:** within 3 months of starting their roles.
  - **For existing staff:** within 6 months from the implementation date of this policy.
- Conduct an orientation workshop for BSFF leadership on the PSEA policy and procedures annually, designed to ensure the policy is well understood and actively implemented by BSFF leadership.
- Organize annual refresher training sessions on PSEA for all BSFF personnel, consisting of a 1-hour session either in person or online.
- Produce awareness-raising materials (fact sheets, leaflets, posters, etc.) targeting BSFF and associated personnel and display these materials in all BSFF offices, distributing them among the staff.

### 6.1.3. Community Awareness

To ensure communities are aware of expected behavior from BSFF personnel and organizational commitments regarding PSEA, BSFF will undertake the following initiatives:

- **Organize Awareness Events:** Conduct awareness-raising events within communities to educate them about beneficiary rights, BSFF staff responsibilities, and expected behavior. These events will also inform communities about BSFF mechanisms for preventing and responding to incidents of sexual exploitation and abuse.
- **Engage with Local Associations:** Meet with local women's associations and other groups knowledgeable about the rights of people with disabilities, child protection, the elderly, minorities, and LGBTQ communities. This engagement aims to explore the effectiveness of local complaints mechanisms and responses, such as health, psychosocial support, SGBV services, legal aid, police assistance, and financial aid.
- **Focus Group Discussions:** Organize small, well-prepared focus group discussions facilitated by SGBV experts. These discussions will involve community members and seek their input on how a community-based reporting mechanism for SEA incidents can receive, address, and refer reports effectively.
- **Orient Communities:** Educate communities about BSFF's complaints mechanisms for PSEA and encourage them to report any actual or suspected incidents of SEA.
- **Develop Communication Materials:** Create communication materials on PSEA tailored to the gender-based identity, age, language, capacity, and cultural context of targeted communities. Utilize various awareness-raising tools and approaches suitable for effective communication.



#### 6.1.4. Integration of PSEA into all Programme/Project Design and Implementation

BSFF will take proactive measures to ensure that all programmes and projects integrate PSEA effectively, thereby ensuring the safety and well-being of beneficiaries.

##### Initiatives include:

- **Comprehensive Risk Assessment:** All project proposals will include a thorough risk assessment, incorporating input from affected individuals with a gender- and diversity-sensitive approach. This assessment will identify potential risks of SEA and include appropriate risk management measures.
- **Awareness Raising and Communications:** Integration of awareness-raising and communication activities on PSEA into programme/project activities.
- **Budget Allocation:** Ensure program/project budgets include specific funding lines for capacity building and communication on PSEA.
- **Monitoring and Evaluation:** Include PSEA-specific aspects in project monitoring and evaluation. This involves cross-checking with the communities BSFF works with to ensure the programme/project is safe. Specific questions will be asked about whether harm or abuse has occurred due to the delivery of goods and services and whether it has been reported, aiming to prevent such incidents in the future.
- **Adaptation/Redesign:** Adapt or redesign any programme/project presenting a risk of SEA by staff or associated personnel.
- **Guidance and Tools:** Develop guidance and tools on safe programming to enable staff to assess and minimize risks, designing programs to achieve positive outcomes in safer environments.
- **Capacity Building:** Build the capacity of staff and partners on safe programming through engagement with related external sectors/actors and participation in training and skill development initiatives.

#### 6.2. Response Provisions

BSFF is dedicated to fostering an organizational environment where all complaints, particularly those concerning Sexual Exploitation and Abuse (SEA), are treated with the utmost seriousness and addressed promptly. In pursuit of this commitment, BSFF will bolster its existing community-based complaints mechanisms and establish robust internal procedures for handling complaints and conducting investigations. To ensure accessibility and safety in reporting SEA incidents, BSFF will maintain multiple reporting channels accessible to BSFF Personnel, survivors, and affected community members.

Furthermore, BSFF will implement standard operating procedures (SOP) for responding to SEA reports or concerns, ensuring that investigations are carried out by experienced professionals trained in sensitive investigations, including those related to Sexual and Gender-Based Violence (SGBV) and allegations of SEA. Substantiated complaints will be met with disciplinary action or contractual consequences, administered in accordance with BSFF service rules, which may include written warnings, documentation on file, suspension, or dismissal. The SOP will delineate specific steps for intake officers/investigators to ensure that

victims/survivors receive information about local, verified assistance services. Additionally, BSFF will adopt a whistleblowing policy to encourage staff to report any wrongdoing related to sexual exploitation, abuse, fraud, or corruption, safeguarding them from any form of retaliation. It will be made explicit that knowingly reporting false or misleading allegations constitutes misconduct and may lead to dismissal. Moreover, BSFF is committed to maintaining confidentiality throughout the SEA response process, ensuring that all aspects of a complaint, including identities of key participants and investigation details, are kept confidential. Any disclosure of confidential information to internal stakeholders will be strictly on a need-to-know basis and in the best interests of the organization and involved parties. Survivor identities will only be disclosed with their informed consent, ensuring their best interests are prioritized, and under the approval of the Secretary General. Violations of confidentiality will be met with disciplinary actions, potentially including dismissal from the organization.

#### **6.2.1. Reporting Mechanisms**

BSFF mandates all personnel and implementing partners to promptly report any suspicions or concerns of Sexual Exploitation and Abuse (SEA) via established reporting mechanisms. Community members are also encouraged to report SEA incidents involving BSFF personnel. To protect the identities of all parties involved, including survivors and complainants, BSFF ensures confidentiality, preserving the presumption of innocence and safeguarding against retaliation. Written reporting is encouraged but verbal reporting is also accepted, with responsible individuals required to convert verbal reports into written complaints. Various reporting channels such as SMS, email, hotline, and community meetings are available, allowing for anonymous reporting without time limits.

Additionally, BSFF appoints a full-time PGI officer responsible for protection, gender, and inclusion, acting as the PSEA focal person at the headquarters, overseeing the reporting process. Each project location, branch, and unit office will have a designated PSEA focal person as primary reporting points. Any complaints received are handled with strict confidentiality and referred to the PGI officer within 48 hours. Complaints against third-party personnel are directed to their respective employers, ensuring alleged perpetrators of SEA are not involved in the complaint settlement process.

#### **6.2.2. Review of the Complaints**

BSFF establishes a Complaints Review Committee comprising members with integrity, gender balance, and expertise in SGBV issues to review complaints. The committee assesses if formal investigations are necessary and refers cases to independent investigators with SEA investigative competency. Legal enforcement referrals are considered, with survivor consent prioritized, especially in cases involving children. The committee recommends disciplinary actions based on investigation outcomes and provides support services to survivors, ensuring their health, security, and psychosocial needs are addressed.



Interim measures may be implemented to protect the integrity of investigations and prevent retaliation, with violators facing disciplinary actions.

### **6.2.3. Investigation**

If the Complaints Review Committee determines that additional evidence is necessary to assess a complaint, they will recommend a formal, independent investigation. BSFF will establish a pool of investigators consisting of both men and women from its staff members, ensuring they receive training on PSEA investigation. Additionally, BSFF will explore the development of a pool of independent investigators with expertise in SEA investigations, prioritizing professional integrity, trustworthiness, and sensitivity to gender equality and PSEA issues.

The investigation team's responsibilities include developing an investigation plan, assessing safety and confidentiality measures in cooperation with the Investigation Manager, gathering and securing evidence, making findings based on evidence, and preparing a comprehensive report. To prevent tampering with documents or records, the team will secure the Subject of Complaint's office equipment, back up computer hard drives, remove data storage devices, and obtain office records, telephone records, and other relevant documents. All collected evidence will be meticulously documented and stored securely, with access limited to the investigation team.

After concluding the evidence collection process, the investigation team will prepare separate investigation reports for each subject of complaint, detailing how the alleged misconduct was discovered, steps taken to gather evidence, conclusions drawn, and any concerns about possible reprisals against witnesses or participants. These reports, along with recommendations for disciplinary actions, will be submitted to the Complaints Review Committee through the Investigation Manager for review. The Committee will ensure that conclusions are logical and supported by reliable evidence before preparing recommendations for appropriate disciplinary actions, which will then be submitted to the organization's disciplinary decision-makers.

## **7. Implementation, Monitoring, and Review**

BSFF implements the policy through a time-bound plan, appointing a full-time PGI officer and establishing PSEA focal points across all levels. Transparent monitoring and reporting mechanisms are put in place, including quarterly status reports, senior management team meetings, and annual progress reports to the management board. Regular training and capacity-building sessions are conducted, and the policy and procedures are reviewed biennially to ensure effectiveness. PSEA issues are integrated into project monitoring processes, and security personnel are trained to understand their roles in PSEA.

## Annexes

### Annex 1: Sample Incident Report Form

#### Important to note

Gathering information at the time of reporting is a crucial element of the process. The report should be objective and precise, focusing on the facts and information received from the complainant that will help when it is time to act. When a child discloses maltreatment or abuse, make sure to ask the questions needed to have a clear understanding of what the child is saying and to ensure the security and welfare of the child.

- Inform the person that all information given in the complaint will remain confidential.
- Be receptive of the complainant and listen to what he or she has to say.
- Write a clear record of what is said by the complainant in his own words. Take the time to cross-check with the complainant that you understand everything before writing.
- Allow the complainant to read what you have written. If the complainant is illiterate, read out the text to ensure that what you have written is what he or she meant. Ask the person if he or she is satisfied with what you have written. If they are not, correct the text with them.

#### 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 way.

**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 on 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?



## **II. Incident of SEA or retaliation**

- Date and time of incident (start/most recent dates):
- Location of incident:
- Detailed description of incident:
- Witnesses (names and contact details) and facts witnessed:
- Has the Complainant been interviewed?
- If so, provide details; including date, time and by whom and whether other persons were present during the interview (provide a copy of the interview report or transcript if available)

## **III. Information about alleged offender**

- Name:
- Employer and job title: National or international staff:
- Contact details (including address, phone and email):
- - Age: Sex or gender identity: Nationality:
- Physical description:
- Is the alleged offender's employer aware of the allegations?
- If so, has the alleged offender's employer opened an investigation?
- If so, has the alleged perpetrator been suspended from duty?
- Has the alleged offender been provided with information on their rights and obligations?

**IV. Information about the Reporter, if different to the Complainant (Survivor)**

- Name:
- Employer and job title:
- Contact details (including address, phone and email)
- Age: Sex or gender identity: Nationality:

**IV. Complainant assistance**

- Ensure survivor-centered 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.



<p><b>V. Reporter assistance if different to the Complainant (Victim/Survivor)</b></p> <ul style="list-style-type: none"> <li>- If the Reporter is an employee of an organization, does she/he have access to adequate whistleblower protections within their organization?</li> <li>- Describe any protection and security measures put in place for the Reporter</li> </ul>
<p><b>VI. Protection of witnesses</b></p> <ul style="list-style-type: none"> <li>- Provide details of any witnesses, their protection needs and any security measures put in place for witnesses.</li> </ul>
<p><b>VII. Risk of the alleged offender repeating the alleged offense</b></p> <ul style="list-style-type: none"> <li>- Outline the risks of the alleged offender repeating the alleged offense</li> <li>- Is there are risk for other members of the affected population/community?</li> <li>- What measures have been put in place to prevent further alleged offenses?</li> <li>- Outline any protection concerns for the alleged offender.</li> </ul>
<p><b>VIII. Additional information</b></p> <ul style="list-style-type: none"> <li>- Date complaint/report first received and by whom:</li> <li>- Does the Complainant/Reporter know about IFRC's process for handling complaints?</li> <li>- Has the Complainant consented to sharing the complaint with the alleged offender?</li> <li>- Any information should be shared with the involved parties as part of a formal investigation.</li> </ul>
<ul style="list-style-type: none"> <li>- SEA Report completed by:</li> </ul>
<p><b>IX. Provide any other relevant information</b></p> <ul style="list-style-type: none"> <li>- Only as needed and appropriate</li> </ul>
<p>Name, date and location</p>

## **Annex 2: Code of Conduct on PSEA**

In accordance with the BSFF Policy on Prevention and Response to Sexual Exploitation and Abuse, and other global standards on PSEA, BSFF affirms that sexual exploitation and abuse by BSFF staff and other personnel associated with BSFF constitute acts of gross misconduct and are therefore grounds for disciplinary actions including termination of employment/contract.

BSFF also announces that sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally, and mistaken belief regarding the age of a child will not be granted as a defense. It prohibits exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior including exchange of assistance that is due to beneficiaries. It also prohibits any kind of sexual relationships between BSFF personnel and affected people since they are based on inherently unequal power dynamics and such relationships undermine the credibility and integrity of humanitarian aid work. Sexual activity includes all forms of activity and abuse of a sexual nature, with or without physical contact and whether either party is aware of such abuse.

Accordingly, as a BSFF personnel, I will remain obliged by the BSFF PSEA Policy and by other associated policies and procedures.

I commit that I shall:

- a) Not indulge in any act of sexual exploitation or abuse.
- b) Not engage in any sexual activity with:
  - Persons under the age of 18 years, regardless of the age of majority or consent locally (ignorance of or mistaken belief in the age of a child is not a defense).
  - Adults who look to benefit or already benefit from BSFF's protection or assistance.

Sexual activity includes all forms of activity and abuse of a sexual nature, with or without physical contact and whether or not either party is aware of such abuse.

- c) Not exchange money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. This prohibition extends to engagement with sex trade workers.
- d) Not produce, procure, distribute or use pornographic material in BSFF offices or on BSFF equipment, including reading/surfing pornographic websites or message boards or sending or engaging with pornographic emails.
- e) Report all concerns or suspicions regarding any violation by a co-worker in relation to a) – d) above (whether BSFF personnel or an individual working for a partner organization).

And, I commit to report any concerns or suspicions regarding sexual abuse or exploitation by a fellow BSFF worker, via established reporting mechanisms. In doing so, I will act in good faith with adequate reasonable grounds for believing the information disclosed constitutes a potential breach of the BSFF policy.

Name of the BSFF personnel:

Designation:

Signature & Date:



### Annex 3: Mapping of legal aid and human rights organizations for referral services

SL	Name of organization	Address	Email and Phone no
1	National Helpline Centre for Violence against Women and Children	Department of Women Affairs (7th Floor) 37/3 Eskaton Garden Road, Dhaka-1000	Helpline Number- 109 E-mail: 109helpline@gmail.com
2	Victim Support Centre	Women Support & Investigation Division Dhaka Metropolitan Police Tejgaon Thana Complex, Tejgaon, Dhaka-1215	Mobile-01745774487, Phone-9110885, DMP-2634, Fax-9137838 Hotline- 0175555544, 01755556645, 01733219005 E-mail- vsc.dmp@dmp.gov.bd
2	National Human Rights Commission	BTMC Bhaban (8th Floor) 7-9 Kazi Nazrul Islam Ave, Kawran Bazar, Dhaka-1215, Bangladesh	Chairman # 88-02-55013713; Full Time Member # 88-02-55013715; Secretary # 88-02-55013716 PABX # 88-02-55013726-28 FAX # 88-02-55013725; Help-Line: 16108 Email: info@nhrc.org.bd; complaint@nhrc.org.bd
3	Ain o Salish Kendra (ASK)	2/16, Block-B, Lalmatia, Dhaka-1207, Bangladesh. Web: http://www.askbd.org	Phone: 880-2-8100192, 8100195, 8100197 Mobile: 01714025069 Fax: 880-2-8100187 E-mail: ask@citechco.net Emergency contact for support services (9 am- 5pm) Phone: +88 01724 415 677, +88 01730 450 756, +88 01714 025 067, +88 01756 185 717
5	Bangladesh Mahila Parishad	Sufia Kamal Bhaban, 10/B/1, Segunbagicha, Dhaka-I 000	Phone # 88-02-9582182, 88-02-9511904 Fax #88-02-9563529 E-mail # info@mahilaparishad.org
6	Bangladesh Legal Aid and Services Trust (BLAST)	1/1 Pioneer Road, Kakrail, Dhaka-1000, Bangladesh	Tel:0088-02-8391970-2, 8317185 Fax: 0088-02-8391973 Email: mail@blast.org.bd
7	Acid Survivors Foundation	Plot # A/5, Block # A, CRP Building, 5th & 6th floor, Mirpur - 14, Dhaka - 1206, Bangladesh	+880 9678777148, +880 9678777149 Hotline: +88 01713010461 asf@acidsurvivors.org
8	Bangladesh National Women's Lawyers Association (BNWLA)	Monico Mina Tower, West Agargaon, 48/3 Shahid Shahabuddin Shorok, Dhaka 1207	Phone: +8802-9143293, +88-02-9121925 Email: bnwlabjmas@gmail.com

#### Annex 4: Sample oath of confidentiality

I, the undersigned, shall exercise the utmost discretion with regard to my involvement in receiving complaints on SEA / the investigation/ as a member of the PSEA Complaints Review Committee of BFSS. I shall hold secret all information known to me by reason of my activities in responding to the allegation of SEA.

I shall not use such information for private gain, or to favor or prejudice any third party. I understand that this declaration will remain in force even after the completion of duties in dealing an allegation.

I also understand that divulging confidential information to persons who are not authorized to receive it may amount to gross misconduct resulting in dismissal from employment and that the signed original of this declaration will be held in the relevant file.

Name:

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Title:

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Role:

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Signature:

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Date and place:

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**To be filled out by a witness before whom the oath is taken:**

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Name:

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Title:

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Signature:

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Date and place:

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24

**Note:** All persons involved in responding to a SEA allegation either as the CRM officer, PSEA focal person, a manager, a member of PSEA Complaints Review Committee or as investigation team member will require to sign the oath of confidentiality.