

# icddr,b Safeguarding Policy

## 1.0 General Statement

1.1 icddr,b is committed to providing a safe and secure work environment for all Staff, Associated Personnel, and Beneficiaries. To create a sustainably safe work environment, it must acknowledge the rights of all individuals to live free from all forms of harm, neglect, harassment, exploitation and abuse including Sexual Harassment, Exploitation, and Abuse (SHEA). This policy exists to safeguard all icddr,b Staff, Associated Personnel, and Beneficiaries, particularly Vulnerable Adults and Children, from all forms of harm, neglect, harassment, exploitation and abuse including SHEA, provide them with secure reporting options, and outline the necessary steps to be followed subsequent to inquiring into relevant complaints.

## 2.0 Policy Objectives and Scope

2.1 This policy applies to all icddr,b Staff, Associated Personnel, and Members of the Board of Trustees.

2.2 The objectives of this policy are to:

- Prohibit any form of blatant or perceived acts of harm, abuse, neglect, and exploitation at icddr,b
- Create a culture of Safeguarding awareness by assigning specific responsibilities to all levels of Staff and management
- Establish a complaints mechanism to report violations of the Safeguarding Policy
- Provide guidelines for responding to Safeguarding-related complaints

2.3 This overarching policy consolidates Safeguarding provisions and must be read in conjunction with the other associated policies of the organization such as the Child Protection Policy, Sexual Harassment Policy, Whistleblower Policy, and any future policies which might be formulated in related matters. However, in the case of a conflict with any previously issued icddr,b policy relating to Safeguarding, the provisions mentioned in this policy shall prevail.

## 3.0 Definitions

- Associated Personnel includes suppliers of works for hire, vendors, consultants, fellows, interns, collaborators, and downstream partners who work in contractual association with icddr,b.
- Beneficiary includes patients, service recipients, trial/study participants, sample donors, and other

persons affected by crisis being addressed by the organization.

- Child/Children means every human being below the age of eighteen years.
- Complainant means someone who has filed a complaint irrespective of whether the same person has suffered any violation of this policy.
- Neglect means failure of a person who is entrusted with another person's well-being to care for that person.
- Physical Abuse includes, but is not limited to, hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint and inappropriate physical sanctions.
- Psychological Abuse means emotional abuse which causes distress and can be verbal and non-verbal.
- Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live and work free from harm, abuse and neglect.
- Sexual Assault/Abuse means actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- Sexual Exploitation means actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, receiving sexual favors in return of offering promotions or priority treatment, profiting monetarily, socially or politically from the sexual exploitation of another.
- Sexual Harassment means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including, but not limited to, verbal abuse of a sexual nature, demeaning, insulting, intimidating, or sexually aggressive comments.
- Staff means all employees of icddr,b, as defined in the icddr,b Human Resources Policies and Procedures Manual.
- Vulnerable Adult means any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, or unable to protect themselves due to age or illness and who may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation.

## 4.0 Safeguarding Principles

4.1 The organization assumes a Duty of Care to ensure the safety and well-being of its Staff, Associated Personnel and Beneficiaries while on the premises of or engaged in activities hosted by the institution.

4.2 Pursuant to the Duty of Care as mentioned in 4.1 above, this policy prescribes the following Safeguarding principles:

- Accountability– Everyone knows their roles and responsibilities and abides by these
- Prevention– Informing and educating people about harm, abuse and exploitation, what to look for and how to report it
- Protection– Providing reasonable support for those in most need
- Sensitivity– All activity is done with the best interest of the Complainant, with respect to their mental and physical safety and respecting confidentiality
- Zero-tolerance– Concerns or allegations of harm, harassment, exploitation or abuse shall always be taken seriously and be inquired into

## 5.0 Roles and Responsibilities for Ensuring Safeguarding

### 5.1 Organizational Responsibilities

icddr,b shall:

- 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 icddr,b. This includes the way in which information about individuals in the 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 organization;
- Follow up on reports or complaints of Safeguarding concerns promptly and according to due process.

Director, Human Resources shall:

- Act as the Chief Safeguarding Officer and handle all Safeguarding matters independent from undue influence;
- Receive all formal complaints of Safeguarding Policy violations;
- Commission independent Inquiry into Safeguarding related complaint(s) and manage disciplinary actions if a policy violation is found;

- Review the provisions of this policy periodically consulting the Head, Regulatory and Legal Affairs and update the provisions if necessary;
- Provide an annual report to the icddr,b Board of Trustees regarding the Safeguarding policy.

Human Resources shall:

- Keep updated files of signed copies of the Safeguarding Policy and Code of Conduct of new Staff in their Staff files;
- Commission appropriate background check, at the expense of the hiring unit, for positions dealing with Children and Vulnerable Adults;
- Organize *mandatory* Safeguarding training sessions at the induction of newly hired Staff and offer refresher trainings on Safeguarding measures periodically; training sessions will include instructions on how to identify signs of abuse, what proper reporting options are, and how to provide support to those who have been abused.

Department Heads and Supervisors shall:

- Ensure that the respective departmental/unit Staff are aware of the Safeguarding Policy measures and the icddr,b Code of Conduct;
- Account for adherence to this policy in evaluating Staff job performances.

### 5.2 Individual Responsibilities

#### 5.2.1 Child Safeguarding

icddr,b Staff and Associated Personnel shall:

- not engage in sexual activity with, abuse, or exploit anyone under the age of eighteen, as it is prohibited;
- not subject a Child to Physical, Emotional, or Psychological Abuse;
- not engage in commercially exploitative behavior with Children, including Child labor or trafficking;
- not use any identifiable images of Children without written permission from a parent or legal guardian for the specific use and in a way that may result in harm or discrimination towards the Child.

#### 5.2.2 Vulnerable Adult Safeguarding

icddr,b Staff and Associated Personnel shall:

- not engage in Sexual Abuse or Exploitation of Vulnerable Adults;
- not subject Vulnerable Adults to Physical, Emotional, or Psychological Abuse.

#### 5.2.3 Prevention of SHEA

icddr,b Staff and Associated Personnel shall:

- not exchange money, employment, promotion, favorable treatment, goods or services for sexual activity;
- not engage in any sexual activity with Beneficiaries, since the relationship is based on inherently unequal power dynamics;
- not engage in any sexual activity with any other Staff or Associated Personnel, where the relationship is based on inherently unequal power dynamics;
- immediately report any concerns or suspicions regarding Safeguarding violations by icddr,b Staff or Associated Personnel.

## 6.0 Reporting, Inquiry, and Appropriate Actions

6.1 Any instance that is prima-facie violation of the Safeguarding Policy, regardless of who has committed the action, or against whom the action is committed, shall be reported to icddr,b. It shall be remembered that no complaint filed in good faith can be met with retaliation towards the Complainant as per the Whistleblower Policy of icddr,b.

6.2 All Staff should report any violation, that is either committed against them or that they witness, in writing, via email, or in person, directly to the Director, HR, who will immediately launch an Inquiry into the complaint received. If the complaint lies against the Director, HR, then it should be filed with the Deputy Executive Director.

6.3 If Staff, Associated Personnel, and Beneficiaries want to report anonymously, they can do so by dialing 16340 and then dialing the extension 5555 from a mobile phone or landline.

6.4 If someone discloses a complaint with any Department Head, Unit Head, the Gender Focal Point, or a colleague, they should forward the complaint to the Director, HR, forthwith.

6.5 An Inquiry into the alleged violation will be commissioned by the Director, HR, following the disciplinary proceedings described in the HR Policies and Procedures Manual.

6.6 Following exhaustion of the Inquiry proceedings:

- If there is no breach found, then no formal action will be taken. The person who filed the complaint will be briefed about the outcome of the proceedings.
- If there is clear evidence of violation, and there is no denial from the person who the complaint is filed against, their employment at icddr,b will be immediately terminated.
- If the violation is proven against a Child, icddr,b will immediately report to the local law enforcement authorities.

- If the violation is proven against an adult, the local authorities can be alerted with the consent of the adult filing the complaint.

## 7.0 Appeals Procedure

7.1 A member of Staff that is found to be in violation of the Safeguarding policy may appeal the administrative action taken against them.

7.2 The grounds for appeal and appeals procedure is outlined in the Human Resources Policies and Procedures Manual.

## 8.0 Reporting Mechanism to Donors

8.1 If an organizational Inquiry process proves SHEA perpetrated by project Staff, icddr,b Regulatory and Legal Affairs (R&LA) will review the relevant agreement with concerned project donors regarding reporting requirements. If reporting is a requirement in the agreement, R&LA will report through appropriate channels.

8.2 If an organizational Inquiry process proves SHEA perpetrated by any Staff, reporting through the Development Department will occur, as per the relevant provision of the core donors' agreements.

8.3 The reporting to the Donors shall be carried out with due respect to the confidentiality of the personnel involved with the process.

## 9.0 Rights of the Complainant

9.1 As mentioned above, every person has the right to live free from SHEA. icddr,b will provide a range of support to the Complainant including, without limitation, multiple accessible reporting options (online and in-person), maintaining confidentiality according to the Complainant's wishes, no retaliation for complaints filed in good faith, fair Inquiry that does not place blame on the Complainants, and necessary counselling to deal with trauma.

## 10.0 Rights of the Accused

10.1 The accused person(s) shall be presumed innocent until proven guilty either through self-confession or through the findings of the organizational enquiry process. The organizational enquiry process must be carried out respecting the principles of fairness and natural justice. Particularly, the accused person shall be accorded with the opportunity of fair hearing and the opportunity to cross-examine the witnesses in the process. The entire process must be carried out respecting confidentiality. The accused person(s) shall have the right to prefer appeal proceedings against the findings of the enquiry process.

### 11.0 False Allegations

11.1 While extremely rare, if any false allegation is made by a Staff or Associated Personnel against another, wherein the Complainant, at the time of making the complaint, lacked good faith or knew that the complaint was otherwise false in nature, the complaint will be in violation of the Safeguarding Policy as well as the Whistleblower Policy of icddr,b. As such, the Complainant will be met with appropriate disciplinary action as per the applicable organizational policies and procedures.

### 12.0 Monitoring Effectiveness and Policy Review

12.1 Director, HR, in consultation with the Head, R&LA, will have overall responsibility of monitoring and reporting progress on the effectiveness of this policy, as well as publishing an annual report. The report shall consist of status updates on all active and concluded cases.

12.2 Director, HR, in consultation with the Head, R&LA, shall also review the approved policy once every three (3) years.

### 13.0 Violation of Policy

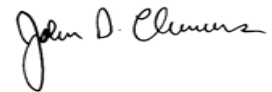
13.1 Non-compliance with this policy may attract appropriate administrative and/or disciplinary measures.

### 14.0 Effective Date

14.1 This policy will take effect immediately.

Recommended by the Senior Leadership Team (SLT) and Adopted by the Executive Director.

Approved by the Board in June 2020.



Initials: \_\_\_\_\_

Dated: \_\_\_\_\_