

CENTRE FOR POLICY DIALOGUE (CPD)

SAFEGUARDING POLICY

1. Introduction

The Centre for Policy Dialogue (CPD) was established with the vision to contribute to the establishment of an inclusive society in Bangladesh which is informed by ideas of equity, justice, fairness, and good governance. CPD's mission is to service the growing demand of the emerging civil society of Bangladesh for an inclusive and accountable development process by stimulating informed debate, generating knowledge and influencing policymaking through research and analysis. A wide range of beneficiaries, internal and external stakeholders including but not limited to staff, consultants, official bodies, development partners is involved in the process. This Safeguarding Policy ensures all the involved parties are well aware of safeguarding principles and also provides clear definitions, sets standards across the organisation, and gives clear guidance on how to apply and implement the policy throughout the organisation.

2. Purpose and Principles

The purpose of this policy is to protect people, particularly children, vulnerable adults, staff, communities and beneficiaries as a whole (this includes people CPD may engage with for the purpose of research, procurement, recruitment, dialogue and communication and all other contract(s) from any harm that may be caused due to their coming into contact with CPD. This includes harm arising from:

- The conduct of staff or personnel associated with CPD.
- The design and implementation of CPD's programmes and activities.

The policy lays out the commitments made by CPD, and informs staff and associated personnel of their responsibilities in relation to safeguarding.

Guiding Principles

The principles in this policy have been drawn from key international, regional and local instruments such as:

- i. The UN Convention on the Rights of the Child (CRC), with specific reference to Article 19 on protection from all forms of violence, injury, exploitation, abuse, neglect, mistreatment and sexual abuse;
- ii. The UN Convention on the Rights of Persons with Disabilities (CRPD) including its special provisions for the protection of children with disabilities from cruel, inhuman or degrading treatment or punishment (Article 15) and exploitation and abuse, including gender-based violence (Article 16);
- iii. International Standards for Keeping Children Safe; and
- iv. Bangladesh Children Act 2013.

3. What is safeguarding?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. It entails a wide potential range of policies, procedures and activities seeking to address child and vulnerable adult safety and wellbeing.

In CPD, a safeguarding approach means minimising the risk of harm, exploitation or abuse of children and vulnerable adults from staff, operations, programme and research activities implemented or undertaken by the organisation. It includes reporting any safeguarding concerns about a child or adult within communities where we work to the appropriate authorities. This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk.

CPD is also committed that an organisational risk register will be maintained and updated covering the risks and mitigation plans related to its operations, programmes, human resource management. CPD will ensure that every new activity or programme will be preceded by a thorough risk assessment and mitigation plan.

4. Scope

- All staff appointed/ employed or contracted by CPD.
- Associated personnel whilst engaged with work or visits related to CPD, including but not limited to the following: development partners, consultants, volunteers, contractors, programme visitors including journalists, photographers, vendors and any other relevant parties.
- All organisational activities and programme.

5. Policy Statement

CPD believes that, everyone we come into contact with either in person or through digital platforms, regardless of age, gender, disability or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. CPD has a zero-tolerance approach on sexual exploitation and abuse.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them. This policy does not cover sexual harassment related issues in details, stealing, bribery, corruption and ethical issues. However, these stated issues are covered in other associated policies of the Centre (see Associated Policies in the article no 8 of this document).

CPD is committed to addressing safeguarding throughout its work, through the three pillars of *prevention, reporting and response*.

A. Prevention

A.1. CPD responsibilities

CPD will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Ensure questions regarding safeguarding are included in any relevant job interviews when recruiting, those responsibilities explicitly outlined within the job description as well as references should be sought from previous employers to get more information of the suitability of candidates.
- Designate staff(s) with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in safeguarding.
- Provide necessary training and support to all staff and relevant parties to enhance understanding and ensure effective implementation of the policy.
- Design and undertake all its programmes including administrative and operational activities, dialogue and communication, outreach and research activities in a way that protects people from any risk of harm that may arise from their coming into contact with CPD, either in person or through digital channels. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Ensure all staff understand and sign up to CPD's Code of Conduct and Safeguarding Policy.
- Ensure regular monitoring to avoid any violations or misconduct towards children and vulnerable group using of institution's electronic equipment and network system.
- Ensure all supporters, donors, sponsors and media representatives involved with CPD work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Monitor communications between funders/sponsors and children to ensure these interactions are safe, during field visits (if any).

A.2. Staff responsibilities

Child safeguarding

CPD staff and associated personnel must not:

- Engage in sexual activity with anyone under-age.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect – either in person or on line.

- Engage in any commercially exploitative activities with children that include child labour, child abuse or trafficking.
- Use manipulated, stereotyped or sensationalized text and/or images.
- Employ discriminatory or degrading language.
- Use images of inappropriately clothed children.
- Feature children in reports, publications, websites, social media sites without the consent of the child and their parents or guardians or partner organisation to use their story, image, disclose identity.

Adult safeguarding

CPD staff and associated personnel must not:

- Sexually abuse or exploit at-risk adults.
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect – either in person or on-line.

A.3. Protection from sexual exploitation and abuse

CPD staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries – either in person or on-line.
- Engage in any sexual relationships with beneficiaries, since they are based on inherently unequal power dynamics.

Additionally, CPD staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy, both on CPD's online platforms/channels and in person.
- Report any concerns or suspicions regarding safeguarding violations by and CPD staff member or associated personnel to the appropriate staff member.

B. Reporting

CPD will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. CPD representatives should be properly informed of the reporting and incident management procedures. Any CPD representative who has a concern or suspicion regarding harm, exploitation or abuse by someone must report such concerns to the Safeguarding (and Gender) Focal Point or designated Officer. Any representatives who raise safeguarding concerns should be protected as far as possible from any detrimental treatment if they come forward with concerns, provided that concerns are raised in good faith. However, deliberate

false allegations will be considered as a major disciplinary offence and treated in accordance with CPD's disciplinary procedures.

CPD will ensure that grievance redress system in place to deal with complaints by the concerned person.

CPD will also accept complaints from external sources such as digital users, partners and official bodies.

B.1. How to report a safeguarding concern

A member of staff will be assigned by the senior management as Safeguarding (and Gender) Focal Point (SFP). Staff members who have a complaint or concern relating to safeguarding should report it immediately to SFP. If the staff member does not feel comfortable reporting to Safeguarding Focal Point (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a member of the CPD Board of Trustees or CPD's Management and Implementation Committee (MIC).

Digital users, partners, official bodies and other external individuals can report a concern by emailing Safeguarding@cpd.org.bd.

B.2 Confidentiality

All reports and the information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with the law of the land.

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only, and should be kept secure at all times, both physical information (anything on paper) and electronically (anything on a phone/computer) Any representatives involved in the investigation process who breach confidentiality shall be subject to disciplinary action. If safeguarding issue is required to be shared with donors and legislators as per agreement or reporting requirements, that information will be non-identifying unless legally obliged by the law of the land.

B.3. Outreach Materials

CPD is committed to adhering to ethical guiding principles on communications to minimise the risks of people misusing photographs, audio-visual materials and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. To this effect, CPD representatives will abide by the following guidelines.

- Ensure all interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality and privacy. Where possible individuals should be prepared for interviews prior to being interviewed. In the case of children, a

parent or guardian should be present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.

- Pictures of adults and children should be decent and respectful and should not stigmatise community, family or the individual. All children, both girls and boys, should wear decent clothing appropriate to the local custom.

- Prior consent to use of information collected in interviews, surveys, and/or images of adults and children should be obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians. To help keep adults and children, consideration should be given to how much information is published.

- CPD is committed to guard carefully any information about adults and children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties. Full names should never be provided alongside other identifiers such as date of birth or community.

- Pictures, materials and personal information regarding individuals will be held in a secure database and according to the appropriate CPD data security protocols. Access to these materials will be employees only through a password-protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

C. Response

CPD will follow up safeguarding reports and concerns according to policy and procedure (see Associated Policies in the article no 8 of this document).

CPD will apply appropriate disciplinary measures to staff found in breach of policy.

CPD will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

6. Monitoring and reviewing the policy

The policy will be monitored on a regular basis by the designated Safeguarding (and Gender) Focal Point (SFP). An annual summary report, including all concerns received, will be submitted by the SFP to the MIC. Any findings requiring a change in policy will be taken to the CPD Board for consideration.

A full policy review will take place annually, as per a mechanism set up by the CPD Board. The review is to include a review of external changes to safeguarding standards that apply nationally and internationally.

Lessons from the reviews will be shared with CPD staff.

7. Associated policies

- CPD's Code of Conduct Policy
- CPD's Sexual Harassment Complaint & Redress Policy
- CPD's Policy on Anti-Fraud, Anti-corruption and Anti-Bribery
- CPD's Ethics Policy
- CPD Service Rules 2020 (Interim)

And other policies as appropriate.

A flowchart indicating the process for making a safeguarding referral to the public authority and should be used in conjunction with the reporting procedure has been provided in **Annex 1**.

Annex 1

Flowchart on the process for making a safeguarding referral to the public authority and should be used in conjunction with the reporting procedure.

