

UCEP PROTECTION POLICY



Preamble

This document is the Protection Policy for UCEP Bangladesh which will be followed by all staff and stakeholders. The primary goal of Protection policy is to protect the well-being of children.

This initiative indicates explicit commitment on the part of UCEP management in order to ensure safety for children by promoting awareness and mitigating the risk of or actual harm that may come to children at all levels and operations involving its internal and external stakeholders.

This policy was finally approved by the Board of Governors (BoG) at its 321st meeting held on 13th February 2020. This policy titled UCEP Protection Policy is expected to render better opportunities for all relevant stakeholders in terms of their understanding and taking the advantages by availing provisions under this policy.

This will be effective from 14th February 2020.



Tahsinah Ahmed

Executive Director

UCEP Bangladesh

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Tahsinah Ahmed
 Executive Director
 UCEP Bangladesh

PROTECTION POLICY

1. POLICY STATEMENT.

Underprivileged Children's Educational Programs (UCEP), Bangladesh is a pioneering non-profit and non-governmental organization which aims to uplift the socio-economic conditions of underprivileged communities by working on learning and skills building amongst underprivileged children. Being a child-focused organization, UCEP Bangladesh recognizes their fundamental duty of care towards all children they engage with, including a duty to protect them from abuse. This includes the fundamental duty of care towards all children where UCEP Bangladesh's programmes and operations facilitate contact with children or have an impact on children. This also includes the duty to protect children from any harm or risk or potential risk of harm resulting from any misconduct, poor practice, poor design or delivery of programmes and/or operations. Children Protection can be achieved through a comprehensive set of internal rules aligned with the laws, rules, regulations and national policies of Bangladesh with a special focus on children protection and observing the best practices all over the world including adherence to the United Nations Convention on the Rights of the Child (UNCRC) 1989.

While children protection is of utmost priority for UCEP, the organization also seeks to have adequate policy/ies in place to protect all of its staff members. Therefore this policy provides a standard framework for managing and reducing risks of abuse by persons or processes by and at UCEP Bangladesh. This Protection Policy affirms the fundamental principle of everybody, especially children's right to protection and free from abuse and exploitation; and that this policy is a manifestation UCEP Bangladesh's zero tolerance approach to abuse and harassment. This policy seeks to enable UCEP Bangladesh to meet the community expectations and beyond and specially while upholding the United Nations Convention on the Rights of the Child to which Bangladesh is a signatory to along with the local laws of Bangladesh.

MANAGEMENT COMMITMENT.

This Protection Policy is UCEP Bangladesh's commitment to protect children and its staff from abuse, harm, negligence and exploitation in any form. This Policy includes protection procedures, which enunciates how UCEP Bangladesh shall implement these actions. This Policy sets out the broad framework and expectations and it is recognized that all levels of management will have to adhere by this at all times; and that the shall be adhered to in addition to the relevant national and local laws, rules, regulations and policies on protection. It is hereby agreed that when in conflict or in the impossibility to comply with the policy, the issue/matter must be brought to the attention of the Executive Director and the Board of Governors of UCEP Bangladesh and that the laws of Bangladesh will always take precedence.

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2. **PURPOSE.**

The purpose of this policy is a result of consideration of all aspects and clear guideline for UCEP Bangladesh to engage in such activities that will ensure that children are safe at all times and that the organization runs lawfully and ethically. The policy seeks to develop a common understanding of child protection issues, develop good practice across the diverse and complex areas in which UCEP Bangladesh operates, and ensure accountability in all spheres of UCEP Bangladesh's work.

3. **SCOPE OF THIS POLICY.** The policy applies to all of UCEP Bangladesh including

3.1 Students

3.2 Employees

3.3 Vendors

3.4 Service Providers

3.5 All entities, organizations (governmental or otherwise), corporations, contractors organizations and their personnel

3.6 UCEP Bangladesh Association members, downstream partners or organizations, including individuals who are contracted or sub-contracted by UCEP Bangladesh Consultants, Contractors or Advisers and their respective personnel

3.7 Any other organization or person associated with UCEP Bangladesh in any capacity whatsoever.

4. **DATE OF EFFECT.** This policy shall be effective from the date of its ratification by the Board of Governors of UCEP Bangladesh.

5. **MANAGEMENT OF THE POLICY.** UCEP Bangladesh shall ensure the

5.1 Effective implementation of the policy;

5.2 All reports of exploitation, abuse, policy non-compliance and breaches are responded to and investigations are started by UCEP Bangladesh;

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- 5.3 Address, monitor and evaluate investigations, outcomes and lessons learned so that a similar situation can be avoided in the future;
- 5.4 Engage in regular hands on training, demonstrations and capacity building for all UCEP Bangladesh stakeholders and partners.

6. POLICY PRINCIPLES.

6.1. Zero Tolerance of Exploitation, Harassment and Abuse.

- 6.1.1 UCEP hereby commits to exercise a zero tolerance approach, i.e. refuse to accept any behavior that is/are an infraction of the standards stated herein this policy, towards all and any kinds of exploitation, harassment and abuse. .
- 6.1.2 All representatives of UCEP Bangladesh shall demonstrate the highest standards of behavior towards children both in their private and professional lives.
- 6.1.3 UCEP Bangladesh has a zero tolerance approach to exploitation, harassment and abuse. Any actual or potential act may attract administrative proceedings including punitive measures. Where situations demands so, legal proceedings may also be instituted.
- 6.1.4 UCEP Bangladesh will not knowingly engage, directly or indirectly anyone who poses a risk to children/student or any personnel of UCEP.
- 6.1.5 UCEP Bangladesh shall specifically endeavor to minimize the actual or potential risks of children/student exploitation, harassment and abuse associated with and/or in all of its functions and programs, and trains its staff and partners on their obligations under this policy.

- 6.2. **Assess and manage protection risk and impact.** While it is not possible to entirely eliminate risks of exploitation, harassment and/or abuse - careful management can identify, mitigate, manage or reduce the risks to all personnel and especially children/students that may be associated with UCEP Bangladesh's functions and programs.

- 6.3. **Sharing responsibility for protection.** To effectively manage risks, UCEP Bangladesh requires the commitment, support and cooperation of all its stakeholders and individuals who help to deliver programs administered by UCEP Bangladesh.

- 6.4 **Procedural fairness.** UCEP Bangladesh shall apply procedural fairness when making decisions that affect any person's rights or interests. All UCEP's partners are expected to

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Executive Director
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adhere to this principle when responding to concerns or allegations of exploitation, harassment and abuse.

6.5 Recognition of the best interests of the child. Bangladesh is a signatory to the United Nations Convention on the Rights of the Child and that UCEP Bangladesh is committed in upholding the rights of the child and Bangladesh's obligations under this convention, therefore the best interests of the child shall be the primary consideration in all actions concerning children.

6.6 Children participation and non- discrimination. Children should be empowered to understand their rights, made aware of what is acceptable and what is not and what they can do if there is a problem or a concern.

7. DEFINITIONS.

7.1. Abuse: Encompasses all forms of physical and/or emotional mistreatment or ill-treatment, abuse that may or may not be sexual in nature or involves sexuality or has sexual connotation, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the person's physical or mental health, survival, development or dignity in the context of a relationship or responsibility, trust or power. This also includes all forms of harassment (in the form of words, gestures, actions, connotations that causes actual or potential belittling, intimidation, hostility or toxic environment), which is any improper and unwelcome conduct (including discrimination) that might reasonably be expected or be perceived to cause offence or humiliation. These collectively includes any activity that directly or indirectly harms or damages including but not limited to physical abuse including unwanted physical contact, emotional abuse, neglect and negligent treatment, sexual abuse including sexual advances and exploitation.

7.2 Bullying: Deliberate or inadvertent hurtful behavior, painful or distressing in nature towards another person that is usually repeated over a period of time. There are four main types of bullying: physical (e.g. including but not limited to pushing, hitting, kicking, slapping or any use of violence); verbal (e.g. including but not limited to classist or racist or homophobic remarks, name-calling, threats, abusive text messages); emotional (e.g. including but not limited to tormenting, ridiculing, humiliating, ignoring, isolating from the group); or, sexual (e.g. unwanted physical contact or abusive comments).

7.3 Child: Every human being below the age of 18 years.

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- 7.4 Consent: The unequivocal voluntary agreement expressed or implied to engage in an activity or otherwise.
- 7.5 Corporal Punishment: Any and all kinds of physical, humiliating or degrading punishment or penalty imposed for an alleged or actual offence or misdemeanor, which is carried out or inflicted, for the purpose of discipline, training or control for punishment or discipline.
- 7.6 Emotional abuse: Includes humiliating and degrading treatment such as name calling, constant non-constructive or destructive criticism, belittling, shaming, solitary confinement or isolation which causes actual or potential emotional harm from an interaction or lack of interaction. It also includes the failure to provide a developmentally appropriate, supportive situation and/ or environment, that effects a person's emotional stability and full range of emotional and social competencies commensurate with his/her personal potentials and in the context of the society in which the person dwells.
- 7.7 Exploitation: Unduly use in work or other activities for the benefit of the other. This includes but is not limited to any activities are to the detriment physical or mental health, education, or spiritual, moral or social-emotional development.
- 7.8 Harassment: A one-off or course of conduct which annoys, threatens, intimidates, alarms, or puts a person in fear of their safety. An action/s shall be considered harassment if it is unwanted, unwelcomed and uninvited and one that demeans, threatens or offends the victim and results in a hostile environment for the victim. It may include, but is not limited to, epithets, derogatory comments or slurs and lewd propositions, assault, impeding or blocking movement, offensive touching or any physical interference with normal work or movement, and/or visual insults.
- 7.9 Neglect: Neglect is the failure to provide for the development of the child in spheres, including but not limited to health, education, emotional development, nutrition, shelter and safe living conditions that has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development and/or general wellbeing. This includes the failure to properly supervise and protect children from harm as much as is feasible.
- 7.10 Physical abuse: Includes the use of actual physical force regardless of its magnitude that cause actual or potential physical harm from an interaction or lack of interaction or suffering or causing to apprehend immediate use of physical violence.



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help to **learn** skills to **earn!**

- 7.11 Safeguarding: Measures to protect the health, well-being and human rights of individuals, which allow all people to live free from abuse, harm and neglect.
- 7.12 Sexual abuse/Sexual Harassment: Includes sexual activity that he or she may or may not fully comprehend, is unable to give informed consent to, or for which a child is not developmentally prepared and cannot give consent, or that violate the laws. Sexual abuse can be any activity that is sexual in nature which includes all forms of rape, sexual touch with or without force including indecent touching or exposure, penetration of the mouth, vagina or anus, molesting using sexually explicit language or gestures or objects made with the aim of gaining sexual favor or gratification, exposure to pornographic material and etc.

8. RESPONSIBILITIES UNDER THE POLICY

- 8.1. UCEP Bangladesh Staff: UCEP Bangladesh staff must ensure all risks which need protection is considered and managed in accordance with UCEP Bangladesh's risk management practices. UCEP Bangladesh will include clause/s obligating adherence to this protection policy to all engagement documents with stakeholders for all activities associated with UCEP Bangladesh.
- 8.2 UCEP Bangladesh Stakeholder/Partners: All organizations and/or individuals are expected to act in accordance with this Protection Policy.
- 8.3 UCEP Sub-Contractors: This Protection Policy applies to all downstream personnel, partners and subcontractors who are engaged by UCEP Bangladesh to perform any part of UCEP Bangladesh's activity. The responsible team lead must ensure the downstream organization or individual subcontractor complies with the relevant minimum protection standards.
- 8.4 Where contact with children is identified in delivery of UCEP Bangladesh's activities, UCEP Bangladesh shall obligate the stakeholders/partners to:
- 8.4.1 Undertake their own risk assessment to ensure they identify and manage risks to children appropriately. This can be incorporated into existing activity planning and risk management practices.
- 8.4.2 Ensure personnel are especially trained in child protection awareness and understand their obligation to protect children when carrying out their work.


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- 8.4.3 Have clear internal reporting mechanism or procedure for their personnel to report concerns, and
- 8.4.4 Report (maximum 24 hours) any suspected or alleged instances of abuse, exploitation, harassment, harm or any non-compliance of this Policy.
- 8.4.5 Any suspicion or disclosure of any abuse, harassment and exploitation must be reported immediately through the organization's internal processes, to the Executive Director. When responding to allegations, UCEP Bangladesh has a responsibility to ensure their employees are treated fairly, and that the rights of each individual are respected during an investigation and any applicable disciplinary process.
- 9. COMPLIANCE MECHANISMS.** UCEP Bangladesh is under a strict obligation to monitor compliance with the requirements of this Policy.
- 9.1 Non-compliance with the minimum protection standards as stipulated herein may lead to suspension or termination of employment, partnership or the respective arrangement with the defaulting individual or organization;
- 9.2 UCEP Bangladesh requires the maintenance of documentary evidence and records from first reporting throughout the investigation process and up to final disposal. These records should be stored and be available at all times;
- 9.3 UCEP Bangladesh reserves the right to remove any individual/s and/or organization from working in on an activity when an individual/s and/or organization has been accused, charged, arrested or convicted of a criminal offence relating to exploitation, harassment and abuse, or specifically when UCEP Bangladesh considers that an individual/s and/or organization poses a risk to a children's safety or well-being.
- 9.4 During formal investigation for incidents relating to exploitation, harassment and abuse, the defaulting individual shall be suspended from duty or transferred to other duties during the ongoing investigation.
- 9.5 UCEP Bangladesh reserves the right to withhold and/or terminate agreements/contracts, contract/agreement negotiations, refuse to engage an individual, or require an individual to be replaced especially on the suspicion of children protection default.

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10. REPORTING. It is mandatory for all UCEP Bangladesh staff, stakeholders, partners, students or anybody associated with UCEP Bangladesh to report immediately as soon as possible not exceeding and not exceeding 24 hours maximum for any suspected or alleged case of exploitation, harassment, abuse or policy non-compliance by anyone within the scope of the policy in connection with official duties or business.

10.1 Any person associated with UCEP Bangladesh must report any behavior that is suspected of engaging in actual or potential child exploitation, harassment or abuse, including possession of child exploitation material or non-compliance of the policy.

10.2 Any additional information, evidence or progress on an already reported matter/incident must also be reported.

10.3 Report and handle any incidents/matter as below for any alleged or suspected incident of misconduct that have happened or may potentially happen:

Step 1: Report in writing any incident of misconduct that has happened or is assumed to have taken place or there exists an apprehension or there is a high risk of happening.

Step 2: A preliminary and immediate enquiry to be conducted by line manager to decide whether a prima facie exists. However, regardless of the existence of a prima facie case, the line manager shall issue a show cause notice and obligate a reply from the suspected/alleged individual(s);

Step 3: Conduct a formal enquiry immediately upon receiving the reply to the show cause notice.

Step 4: Based on the findings the case will be closed with a note on the show cause letter for further preservation.

Step 5: The enquiry committee sends the facts, to the HR dept. for consideration and determination final decision by the Senior Management Team (SMT). At this point, service history or any aggravating factors (if any) must be considered. .

Step 6: Inflicting appropriate disciplinary actions based on findings by the SMT (Senior Management Team) against the perpetrator(s).

Who can report	Child/Youth	Parents or adults.	Staff, volunteers or associates
What to Report?	Allegations, disclosures or observations of child abuse or suspected breaches of the Protection Policy or Code of Conduct.		

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When to report?	All concerns must be reported as soon as practically possible or maximum within 24 hours.		
Whom to report to?	Line supervisor/supervisor's supervisor who must eventually without any delay report to ED; and for circumstances with relation to children - the Child Protection Focal Point (CPFP) must be additionally notified.	Concerns for the safety or wellbeing of any child must be reported to senior Manager and the CPFP.	
What will happen?	Situation and information will be assessed/ investigated and a confidential report will be made in compliance with this Policy and/or within the context of applicable local legislation.		
Possible outcomes	Criminal matters or child protection report made to the appropriate Authority if required/asked by the competent authority.	Victim's and alleged perpetrator's safety needs to be assessed and responded to.	Breach of this Policy and/or Code of Conduct resulting in performance management or termination of Employment.
CP Authority can be contacted at any point for advice and support mail id www.ucepbd.org	Feedback to be given where possible to those directly involved or affected, protecting confidentiality and privacy. Debriefing/counseling to be offered, if needed. In addition, psychosocial counselling should be undertaken if required covering the guardians of alleged/actual victims.		

11. MINIMUM STANDARDS

REQUIREMENT	APPLICABILITY	MINIMUM STANDARD	WHY IS THIS REQUIRED?	WHAT IS THE RISK WITHOUT IT?
Protection Policy	Stakeholder, Partners, Associated organizations and/or individuals involved with UCEP Bangladesh in any capacity whatsoever This Protection Policy is applicable to all personnel, partner's downstream personnel, contractors and subcontractors that are	<ul style="list-style-type: none"> - Publicly available document - Create an abridged version for students if necessary - Referenced in all relevant documentation, including policies, contracts and human resource guidelines 	This Protection Policy provides clear guidance and demonstrates how to ensure that children are protected from child exploitation and abuse in	No acceptable standards to conform to and no accountability

	engaged by UCEP Bangladesh. The head of hierarchy must ensure the downstream organization or individual subcontractor complies with the relevant minimum child protection standards.	<ul style="list-style-type: none"> - Ensure child consultation and participation wherever possible and appropriate - Sign code of Conduct which includes an obligation to abide by this Child protection Policy. - Conduct Background checks - Every premises of UCEP Bangladesh shall have easy and accessible display of contact details for reporting possible child abuse. 	the execution and delivery of UCEP Bangladesh activities	
Recruitment and screening, and employment practices in place	Stakeholder, Partners, Associated organizations and/or individuals involved with UCEP Bangladesh in any capacity whatsoever	<ul style="list-style-type: none"> -All engagement contracts/agreement should contain provisions for termination or suspension or transfer of the defaulter during and after the investigation process - Behavioral based interview questions about the applicants work with children. - Undertake at least two verbal referee checks and ask specific questions about the applicant's work/engagement with children - Conduct Police Verification/Obtain police clearance Certificate - Sign an affidavit from the new recruited person that they have never been charged with child exploitation offences 	Robust recruitment, screening and employment practices reinforce the importance of the organization's child protection policy to personnel.	Personnel that pose unacceptable risks to children are unable to be removed (suspended, transferred or terminated) .

		(statutory or otherwise) and that they will not engage in violation of any children's' rights during the tenure of his/her engagement/employment - Job orientation/ induction will include briefing on child protection issues.		
Training	Mainly the Stakeholders including the students, Partners, Associated organizations and/or individuals who work within the premises of UCEP Bangladesh including the downstream partners and/or personnel	<ul style="list-style-type: none"> - Attend protection training, refresher course, demonstration - Maintain training attendance records - Materials used in training should be contextualized and taken from real life examples - Regularly attend and participate learning sessions with regards to laws and policy updates relating to the protection especially with regards to children 	Individuals and organizations must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.	Lack of awareness or lack of awareness of the importance of the Protection Policy renders the entire exercise useless.
Assessment and management of risk	Mainly the Stakeholders including the students, Partners, Associated organizations and/or individuals who work within the premises of UCEP Bangladesh including the downstream partners and/or personnel	<ul style="list-style-type: none"> - Plan risk identifying activities and measures to reduce or remove risk specifically to children - Documentation that risk assessments are reviewed and updated regularly during the lifecycle of any activity/project period - Adaptation to socio-economic context of Bangladesh) 	Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation involve higher risks.	Risks to children are missed during activity design and implementation.

Reporting	Any person/organization that is aware or suspects any actual or potential harm or risk of harm to any children	<ul style="list-style-type: none"> - Maintain documentary evidence at all time - Reporting mechanism must respect the rights of both the victim and the alleged offender. 	Reporting is necessary since reporting is the first step of identification and redressal.	Personnel are unaware how to report concerning behavior.
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- 12. COMMUNICATION.** Any person or organization or undertaking business with and on behalf of UCEP Bangladesh especially those that involves working or being in contact with children is expected to adhere to the following behaviors while they are performing their duties and the Code of Conduct as provided below:

GOOD PRACTICE	POOR PRACTICE
Treat everyone with dignity and respect	Trivializing or belittling abuse or concerns
Set an example you would wish others to follow	Form an intimate relationship with a child or any other relationship that would be an abuse of trust
Treat all person equally and not engage favoritism	Allow abusive activities between children such as initiation ceremonies or bullying
Respect everybody and especially child's right to personal privacy	Engage in inappropriate behavior or contact – physical, verbal, sexual Engage in inappropriate behavior or contact – physical, verbal, sexual
Avoid unnecessary physical contact – your actions, regardless of how well-intentioned, might be misinterpreted by them or someone else	Make sexually suggestive remarks or threats, even humorously
Avoid unacceptable situations for example, a sexual relationship with a participant, even if consensual or the participant is over the age of consent	Use inappropriate language, whether speaking or writing – in person or by phone, email or through use of social media
Plan activities that involve more than one other person being present, or at least are within sight and hearing of others	The use of inappropriate language unchallenged
Allow everybody and especially children to	

talk about any concerns they may have	
Encourage others to challenge any attitudes or behaviors they do not like	
Avoid being drawn into any kind of inappropriate attention-seeking behavior	
Keep other colleagues informed of where you are and what you are doing	
Take all allegations or concerns of abuse seriously and refer them immediately to the person in charge	

RECOGNISE

When there is :

- a disclosure that something is wrong
- have a concern that a child or any other person is being harmed or is at risk of being harmed
- hear a concern from someone else that a child or any other person is being harmed or is at risk of being harmed

Do not ignore the disclosure/s or concern/s

Upon a disclosure or concern – Keep calm, listen carefully and do not push for information. Make them feel that they are being heard and taken seriously. Reassure them that it was right to tell you and let them know what you will do next.

If the victim is in obvious and immediate danger of harm, your first action is to remove them from harm's way. Ask a supervisor for their or the law enforcing authority for guidance if you are not sure

RESPOND

Report Immediately

RECORD

Record or document the disclosure or your concern and submit it in writing to the appropriate person, with a copy to the Executive Director. Describe the facts clearly and with as much detail as possible. Clearly separate your opinions from the facts.

- 12.1 Abide by the laws of Bangladesh at all times;
- 12.2 Treat everybody especially children with respect;

- 12.3 Refrain from using language that is degrading, victimizing, shaming or has a connotation of the same or exerting any behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- 12.4 Listen to everybody and especially children or to their demands with patience. Listen carefully and politely. Do not interrupt when he/she is trying to tell his/her story.
- 12.5 No male adult should ever be alone with any children and wherever possible, female adults should ensure that another adult is present while working with children;
- 12.6 Make arrangements to speak to more than one child at all times when possible;
- 12.7 Assist the child/ren to plan some specific steps to solve problems;
- 12.8 Always tell the truth to the children;
- 12.9 Empower children and/or discuss their rights with them;
- 12.10 Ask what happened not why what happened;
- 12.11 Do not engage with children in any form of sexual contact/intercourse or sexual activity including paying for sexual services;
- 12.12 Do not invite unaccompanied children into private residences unless they are at immediate risk of injury or in physical danger;
- 12.13 Not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children);
- 12.14 Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium;
- 12.15 Not use physical punishment on children;
- 12.16 Not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury;
- 12.17 Comply with all relevant local legislation, including labour laws in relation to child labour;
- 12.18 Immediately report concerns or allegations of exploitation, harassment and abuse and policy non-compliance in accordance with appropriate procedures;
- 12.19 Be aware of behavior and avoid actions or behaviors that could be perceived by others as exploitative, harassing or/and abusive;
- 12.20 **PHOTOGRAPHING OR FILMING.** When photographing or filming any person and especially child/ren or using such images for work-related purposes:

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- 12.20.1 Obtain informed consent from the person and in the event of a child, the consent must be obtained from the child's and parent or guardian prior to photographing or filming as provided in Appendix 1 herein below;
- 12.20.1 Keep a written when the consent obtained is verbal
- 12.20.2 Respect the wishes and feelings of the person photographed and before the same are disseminated.
- 12.20.2 Ensure photographs, films, videos and DVDs present the person and especially children in a dignified and respectful manner; and not in a vulnerable or submissive manner. The photograph must focus on the overall activity or group as opposed to close ups or individual shot. Children should be adequately clothed and not in poses that could be perceived as sexually suggestive;
- 12.20.3 Ensure images are honest representations of the context and the facts and does not promote or spread any negative stereotype;
- 12.20.4 Ensure file labels, meta data or text descriptions do not reveal identifying information about the person or a child when sending images electronically or publishing images in any form.
- 12.20.5 Never share a photograph or video footage of a person and especially child/ren on personal social media account/s unless you have specific permission from their or their parents and/or UCEP Bangladesh.
- 12.20.6 Unless specific written parental/guardian consent is obtained, a child must not be identified by his/her by real name in any social media captions.
- 12.20.7 When working with other organizations, it must be ensured that proper permission to use any photographs; videos etc. that includes children are obtained.

13. IMPLEMENTATION. This Protection Policy shall form an integral part of the operations of UCEP Bangladesh. This will be implemented by way of -

- A. Child Protection Capacity Building Programme: A dedicated Child Specialist will conduct workshops, trainings, and/or demonstrations, advocacy and with a view to enhance awareness of child protection issues among staff and associates through policy promotion, collaboration, advocacy and ongoing education and training.
 - B. Compliance: All agreements, contracts or instrument of engagement with UCEP Bangladesh will include a clause which would bring them within the purview of this policy and thus obligating them to follow the policy at all times during the tenure of their engagement with UCEP Bangladesh.
 - C. Reporting: All incidents, whether actual, potential or suspected is to be reported. All reports will be handled professionally, confidentially and as quickly as possible in conformity to the laws of Bangladesh while taking into account the socio-economic context to ensure that the victim is protected and safe at all times. Any employee who intentionally makes a false or malicious allegation or engages in sabotage will face disciplinary action as deemed proper by the management of UCEP Bangladesh.
 - D. Child Protection Focal points (CPFP): CPFP will be assigned to support and provide counseling to promote child protection, detect, respond and continue provide support to any actual or potential victim abuse.
 - E. Risk Management: Incorporate effective child abuse prevention strategies within UCEP Bangladesh's program designs, activities and emergency responses
 - F. Engage in screening in recruitment and staff management practices.
- 13.1 To implement the Protection Policy - UCEP Bangladesh schools, Region office and UCEP Bangladesh Head Office shall establish a Child Protection Committee (CPC). This will be comprised of 5 people, i.e. 1 person from each category - 1. Child Protection focal person; 2. Counselor/ Teacher; 3. Representative of the Parents; 4. Representative of the Students; and 5. Representative from the Community. The CPC shall perform the following functions:
- 13.1.1 Ensure the effective implementation of the Protection Policy during the academic calendar.
 - 13.1.2 Initiate information dissemination programs and organize activities for the protection of children from abuse, exploitation, violence, discrimination and bullying or peer abuse.
 - 13.1.3 Develop and implement a school-based referral and monitoring system.
 - 13.1.4 Identify and/or detect students who may actually or potentially suffer from any kind of harassment

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- 13.1.5 Identify, refer, report to the appropriate offices cases involving child abuse, exploitation, violence, discrimination and bullying;
- 13.1.6 Coordinate closely with the Child and Woman Rights Advocacy component & Child Protection Committee as may be appropriate; and
- 13.1.7 Ensure that the children's right to be heard are respected and upheld in all matters and procedures affecting their welfare.
- 13.1.8 Assess template contracts with partners and employee documents and make sure they contain provisions for child protection.
- 13.1.9 Convene a national level child protection meeting and participate in such programmes least once each year to assess and update the policy and educate own selves.
- 13.1.10 Convene annual trainings each year at the local level to make sure all staff are up-to-date on the current protection policy
- 13.1.11 UCEP Bangladesh will collect data as to how this policy is used. Supervisors, managers and those responsible for dealing with child protection cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations or learnings. This will be done annually. The headquarters will evaluate the effectiveness of this policy based on this annual report and make any changes needed.

13.2 DISCLOSURE AND REPORTING.

13.2.1 General guidelines when the victim is disclosing an incident:

- i. Accept what is being said
- ii. Listen carefully
- iii. Keep calm
- iv. Do not panic
- v. Do not seek help while the victim is talking to you
- vi. Be honest
- vii. Look directly
- viii. Do not appear shocked

- ix. Assure them that they are not to blame for the complaint
- x. Do not ask leading questions
- xi. Do not to repeat the same questions to the victim
- xii. Never push for more information than the victim has given you, even if you think they have not told you everything
- xiii. Do not fill in words, finish their sentences, or make assumptions
- xiv. Be aware that the victim may have been threatened or may be frightened about what will happen next

13.2.2 Distinguish between what has been actually said and the inferences that may be drawn;

13.2.3 Accuracy is paramount in this stage of the procedure;

13.2.4 Assure that confidentiality will be maintained and that the complaint will be disclosed on a need to know basis;

13.2.4.1 WHISTLE BLOWER PROTECTION:

i. WHISTLEBLOWER: Any person who reports an activity that he/she deems to be in infraction of the standards/provisions of this Policy;

ii. Whistleblower protections are provided in two aspects –

(1) Confidentiality: The confidentiality of the whistleblower shall be maintained at all times except as provided otherwise. Identity may however have to be disclosed to conduct a thorough investigation to comply with the law and to provide accused individuals their legal rights of defense.

(2) Against Retaliation: UCEP Bangladesh shall not retaliate against a whistleblower nor shall it tolerate the accused to retaliate against the whistle blower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against

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retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

- 13.3 Document the complaint;
- 13.4 Immediately (within 24 hours) report the incident;
- 13.5 If the victim is in immediate danger of harm of abuse, the victim must immediately be removed from harm or risk of harm;
- 13.6 Investigation, administrative proceedings and/or punitive procedures should be started immediately, and the date, time and fact(s) of the incident recorded;
- 13.7 The views of the victim as to what outcome he/she wants must be ascertained and respected and UCEP Bangladesh representatives must ensure that the victim understands the procedures for dealing with the complaint

14. HANDLING.

- 14.1 Upon receiving a formal complaint or abuse or suspected abuse, suspend the alleged perpetrator.

14.1.1 The act of suspension does not indicate guilt. An individual must not be suspended automatically when there has been an allegation or without careful thought.

14.1.2 Suspension should be considered in cases where:

- i. There is cause to suspect the victim is at risk of significant harm; or
- ii. The allegation warrants investigation or is so serious that it might be grounds for dismissal; or
- iii. There are concerns that the person about whom the allegations are made may put pressure on, or interfere with, potential witnesses or otherwise impede the enquiry.

- 14.2 Upon deciding to suspend: Communicate in writing to the person being suspended with a message that includes:

- i. The reason/s of suspension
- ii. That suspension does not assume guilt or represent disciplinary action. It is a neutral step.

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iii. That the enquiry will be done as fast as possible, and the suspension will be reviewed to avoid it becoming unnecessarily protracted.

14.3 Upon completion of full enquiry, escalate the complaint and upon finding merit in the complaint, the highest tier of management impose penalties as deemed appropriate.

15. POLICY DECISION, EFFECTIVE DATE AND REVIEW.

15.1 The Human Resource Department of UCEP Bangladesh shall have the overall responsibility to ensure the implementation of the policy and guidelines; and shall evaluate annually with regards to its efficiency and make recommendations for amendment, if necessary.

15.2 The Policy shall be reviewed atleast once every year, or whenever there is a major change in the organization or in relevant legislation or based on socio-economic progress or needs and/or from lessons learnt.

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UCEP Bangladesh

Appendix 1

A. PROTECTION DECLARATION FORM

STATEMENT TO BE SIGNED BY ALL STAFF, PERSON/S, ORGANIZATION/ENTITIES ASSOCIATED OR PARTNERS OR STAKEHOLDERS OF UCEP. *

I/WE CONFIRM THAT I/WE HAVE READ, UNDERSTOOD AND HEREBY AGREE TO ABIDE BY AND BE GOVERNED BY UCEP BANGLADESH'S PROTECTION POLICY.

I/WE AGREE TO COMPLY WITH THE POLICY AND I/WE UNDERSTAND THAT A BREACH OF THE POLICY OR CODE MAY PROVIDE GROUNDS FOR MY/OUR ENGAGEMENT/ASSOCIATION WITH UCEP BANGLADESH TO BE TERMINATED. I/WE ALSO UNDERSTAND THAT A BREACH OF THIS POLICY MAY RESULT IN CRIMINAL PROSECUTION SHOULD IT BE NECESSARY. I UNDERSTAND THAT IT IS MY RESPONSIBILITY, AS A PERSON ENGAGED BY UCEP BANGLADESH TO USE COMMON SENSE AND AVOID ACTIONS OR BEHAVIORS THAT ARE ABUSIVE OR, OR COULD BE CONSTRUED AS SUCH.

I/WE HEREBY AUTHORIZE UCEP BANGLADESH TO UNDERTAKE ANY NECESSARY INQUIRIES, INCLUDING CRIMINAL RECORD CHECKS AND REFERENCE CHECKS, AS PART OF MY/OUR APPOINTMENT OR RECRUITMENT PROCESS AS APPLICABLE

I ALSO CONFIRM THAT I SHALL PARTICIPATE IN ALL TRAINING SESSIONS ON CHILDREN PROTECTION.

[INSERT NAME]

Son/Daughter of [INSERT]

NID [INSERT]

[INSERT DESIGNATION]

[INSERT DATE]

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B. PHOTO/VIDEO RELEASE CONSENT FORM FOR CHILDREN

I, _____, parent/guardian of _____, hereby grant permission to UCEP Bangladesh to use my ward's photographs and/or video taken on _____ at _____ in publications, news releases, online, and in any other communication materials if UCEP Bangladesh.

[INSERT NAME]

Parent/ Guardian of [INSERT]

[INSERT DATE]

আমি, _____, আমার সন্তান _____ এর পিতা/মাতা / অভিভাবক, এই মর্মে অঙ্গীকার করছি যে আমার সন্তানের ছবি এবং/ অথবা চিত্রধারণ (ভিডিও) _____ তারিকে, _____ স্থানে তোলা, প্রকাশ, প্রকাশনা, অনলাইনে প্রকাশ, গণমাধ্যম, সংবাদ, এবং অন্য যে কোনও ইউসেপ এর যোগাযোগের জন্যে ব্যবহার করার অনুমতি প্রদান করছি।

নাম

..... এর পিতা/মাতা / অভিভাবক

তারিখ -