






UCEP Bangladesh

**Prevention of Sexual Exploitation and Abuse (PSEA)
and Prevention of Sexual Harassment (PSH)
Policy 2023**

Approved in 342 BoG meeting held on 28 March 2023


Dr. Mohammad Alauddin
Chairperson
UCEP Board of Governors



1. INTRODUCTION

UCEP Bangladesh has a zero tolerance for Sexual Exploitation and Abuse (SEA) and Sexual exploitation or abuse or harassment (SH). UCEP Bangladesh is committed to protecting all communities, beneficiaries, staff that the organization works with from sexual exploitation and abuse and sexual exploitation or abuse or harassment at all times. This document is a part of UCEP's Safeguarding Framework that consists of this policy, procedures, code of conduct and reporting forms.

2. PURPOSE AND SCOPE

2.1 OBJECTIVE

The objective of this policy is to;

- Define SEA and SH and the expected code of conduct of UCEP Bangladesh staff with regard to sexual relation with beneficiaries;
- Determine action to prevent SEA and SH from happening;
- Determine clear mechanism to report SEA and SH; and
- Define mechanism for UCEP Bangladesh to respond to SEA and SH related issues effectively.

2.2 SCOPE

UCEP Bangladesh will not tolerate its staff, associates, partners, communities or any other representatives associated with its mission and vision, to engage in any form of sexual exploitation or abuse and harassment. All staff members of the Organization and its associates are treated with dignity and respect and are aware of their role and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation, abuse or harassment. The policy clarifies definitions and responsibilities regarding prohibited behavior and the associated prevention procedures outline the reporting and investigation processes. In return, the organization is committed to promoting equality in the workplace by taking all reasonable measures to prevent such incidents and to deal promptly and fairly with any reports of SEA and SH in a confidential and discreet manner. This policy does not preclude the reporting of SEA and SH complaints to if the matter is perceived to be of a criminal nature, to the police.

SEA and SH are two different but related areas:

The key difference between SEA and SH is the victim- in the case of SEA, the victim is a person of concern, or a member of the local or host community/ beneficiaries of UCEP. In the case of SH, the victim is a fellow staff, whether working with UCEP Bangladesh or with any partner organization. In both cases of SEA and SH, the perpetrator is a employee of UCEP Bangladesh. Both forms of sexual misconduct are unacceptable, and UCEP Bangladesh is committed to eradicating them from its operations and offices and ensuring that all victims receive the support they need.

3. APPLICABILITY:

This policy applies to all Association Members, Board of Governors (BoG), staff, associates, beneficiaries, communities, vendors, consultants, partners and any other representative associates with UCEP Bangladesh.

4. GOVERNANCE:

The BoG is ultimately owner and responsible to ensure for implementation of this policy. The Executive Director, together with SMT, has responsibility for this policy implementation and its proper management, using a systematic approach. As such, the Board of Governors will receive a summary of any reported sexual exploitation and abuse or harassment incidents and follow-up measures taken at each Board meeting, respectively. It is the responsibility of all representatives of UCEP to raise any concerns regarding sexual exploitation, abuse and harassment. UCEP Bangladesh takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

5. GUIDING PRINCIPLES:

This policy and the entire safeguarding framework are guided by the following principles:

4.1 SAFEGUARDING: UCEP Bangladesh is committed to all community members, beneficiaries, staff and associates as having the right to safeguarding and protection from sexual exploitation and abuse and sexual exploitation or abuse or harassment irrespective of ability, ethnicity, faith, gender, sexuality and culture. A key principle within this is that all processes are survivor led and do no harm. UCEP Bangladesh commits to survivors leading the complaint process where it is possible and appropriate to do so.

4.2 SHARED RESPONSIBILITY: For this policies and practices to be effective in reducing the risks to beneficiaries and communities, all at UCEP Bangladesh must share the responsibility for implementation and improvement. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.

4.3 EFFECTIVE COMMUNICATION: UCEP Bangladesh effectively communicates with all staff, associates, and partners in simple and accessible language to create a positive and accessible culture where responsibilities for prevention of SEA and SH are clear.

4.4 CONTINUOUS IMPROVEMENT: The policy will be revised at appropriate times to reflect changes in approach and process, based on the recommendation by the SMT (Senior Management Team) and or the Ombudsperson and subsequent approval thereupon by the BoG. Executive Director (ED) or anyone assigned by him/her may form a committee to review and update the policy. UCEP Bangladesh provides assessment, reflection and feedback mechanisms to inform the BoG

of any improvements that can be made to policies and practices. These mechanisms include quarterly incident reviews, regular safeguarding audits, as well as regular policy review and refresher training.

4.5 DIGNITY AND RESPECT: UCEP Bangladesh creates a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations are at the heart of what the organization does. Included in this are the principles of being non-judgmental when hearing the concerns and complaints of survivors of sexual exploitation and abuse and sexual exploitation or abuse or harassment. Assistance and support shall be victim/ survivor-centered, age and gender sensitive, and culturally appropriate. Where victims of violence are children, assistance and support shall be provided in a manner consistent with the best interests of the child.

4.6 ZERO TOLERANCE: UCEP Bangladesh has zero tolerance for any forms of sexual exploitation and abuse and sexual harassment.

4.7 CONFIDENTIALITY: UCEP Bangladesh will protect the confidentiality of sexual exploitation and abuse allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation. Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others. UCEP Bangladesh will share information about allegations of sexual exploitation, abuse and harassment only with those who need to know about it. Records relating to sexual exploitation, abuse and harassment complaints will also be kept confidential on the same basis.

6. UCEP BANGLADESH'S COMMITMENTS

UCEP Bangladesh believes that all people have a right to live their lives free from sexual exploitation and abuse and harassment and will not tolerate its staff, associate or partners engaging in any sort of behaviour that puts beneficiaries or communities at risk. UCEP Bangladesh commits to:

1. Creating a safe culture for both those it serves and those who work for and represent the organization.
2. Following through on any complaints and concerns in a timely manner through its Safeguarding Committee and taking each complaint seriously.
3. Sensitising staff, associates and partners, around how to make a complaint.
4. Ensuring zero tolerance towards sexual exploitation and abuse and sexual exploitation or abuse or harassment.
5. Building a culture of dignity, honor and respect where all those who work with and are served by UCEP Bangladesh feel empowered to report complaints.

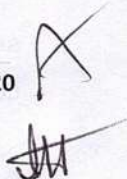
6. Educating staff, associates and partners that sexual exploitation and abuse and sexual exploitation or abuse or harassment constitute gross misconduct and are grounds for termination of employment and possibly legal action.
7. Providing information on how to report complaints and the investigation procedure.
8. Ensuring that all staff, associates and partners have access to the PSEA and PSH policy and procedures as well as all other related safeguarding policies.
9. Providing training to all staff, associates and partners on PSEA.

7. SIX CORE PRINCIPLES RELATING TO SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARASSMENT

- 7.1 Sexual exploitation and abuse and sexual harassment by Association Members, Board of Governors (BoG), staff, associates, vendors, consultants, partners constitute acts of gross misconduct and are therefore grounds for termination of employment/Contract/Partnership.
- 7.2 Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- 7.3 Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
- 7.4 Any sexual relationship between those providing UCEP service and a person benefitting from such service that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- 7.5 Where UCEP Staff develop concerns or suspicions regarding sexual abuse or exploitation or harassment by a fellow worker, whether within the organization or not, he or she must report such concerns via established whistleblowing policy or reporting mechanisms.
- 7.6 UCEP Staff are obliged to create and maintain an environment which prevents sexual exploitation and abuse and harassment and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."

8. WISTLEBLOWING POLICY

UCEP Bangladesh Whistleblowing policy and all its amendments are considered as an integral part of this policy.



9. SAFEGUARDING COMMITTEE

A Safeguarding Committee has been established at the Head Office level as well as in each regional office. The Safeguarding Committee is comprised of 5 members:

1. One woman in a Senior Management Role or Sr./Specialist, Social Inclusion will Chair the committee; in regional level Gender Focal person or Team Leader, Social Inclusion will carry out the duty
3. Three members will be from across different departments/unit
4. A fifth member who is an external expert in harassment, sexual exploitation or abuse.

All Safeguarding Committees will ensure that there is diversity and gender balance on the committee. The Safeguarding Committee will be responsible for informing and training all staff in safeguarding, PSEA and PSH policies and procedures. They will also be responsible for receiving and investigating any safeguarding complaints, including PSEA and PSH, unless otherwise determined by the Chairperson of BoG/ED/Ombudsperson.

The Safeguarding Committees will be trained in all of the Safeguarding policies as well as reporting and investigations. The Safeguarding Committee will also be provided with specialised psychological first aid training so that they are able to offer appropriate support as required.

10. PROCEDURE

As referred to in UCEP Bangladesh's whistle-blowing policy, all disclosures will be treated in confidence.

9.1 Complaint:

9.1.1 Reporting of Complaints: Complaints may be made to the Safeguarding Committee (Head Office/Regional Level)/ED/Chairperson, BoG, any member of the Board through complaint box or direct mail or letter or verbally. Such a report, when made orally, should be reduced to writing in the form of Appendix-A and signed by the complainant. Complainants are urged to report any sexual exploitation or abuse or harassment promptly immediately after it occurs. However, because the organization recognizes the emotional impact of sexual exploitation or abuse or harassment on a victim of such behaviour, delay with justified grounds in reporting will not automatically preclude the organization from taking action in a given situation.

Recognising that reporting procedures in cases of SEA and SH are very different, UCEP BANGLADESH will create an environment where, in both situations, individuals, communities, UCEP BANGLADESH personnel, vendors and partners feel safe to report violations and trust that immediate and decisive action will be taken against perpetrators.

In cases of SEA, complaint mechanisms will be safe, gender-sensitive and appropriate to the context. They will be developed in consultation with affected communities, particularly those most vulnerable and linked to services for survivors. An SEA risk assessment and a contextualized needs assessment will inform the development of new complaint channels and reinforce existing channels.

Confidentiality interests and the interests of survivors will be considered before and during all cases. Anonymous complaints will be accepted through multiple channels. Deadlines will not be imposed. Protections from retaliation will be offered. A dedicated Social Inclusion manager will assist in keeping parties appropriately updated on the process and informed of available support.

For both SEA and SH, the Executive Director and Senior Management will actively promote and reinforce a 'speak up, speak out' culture and actively engage in understanding the attitudes, cultures and power dynamics that drive under-reporting.

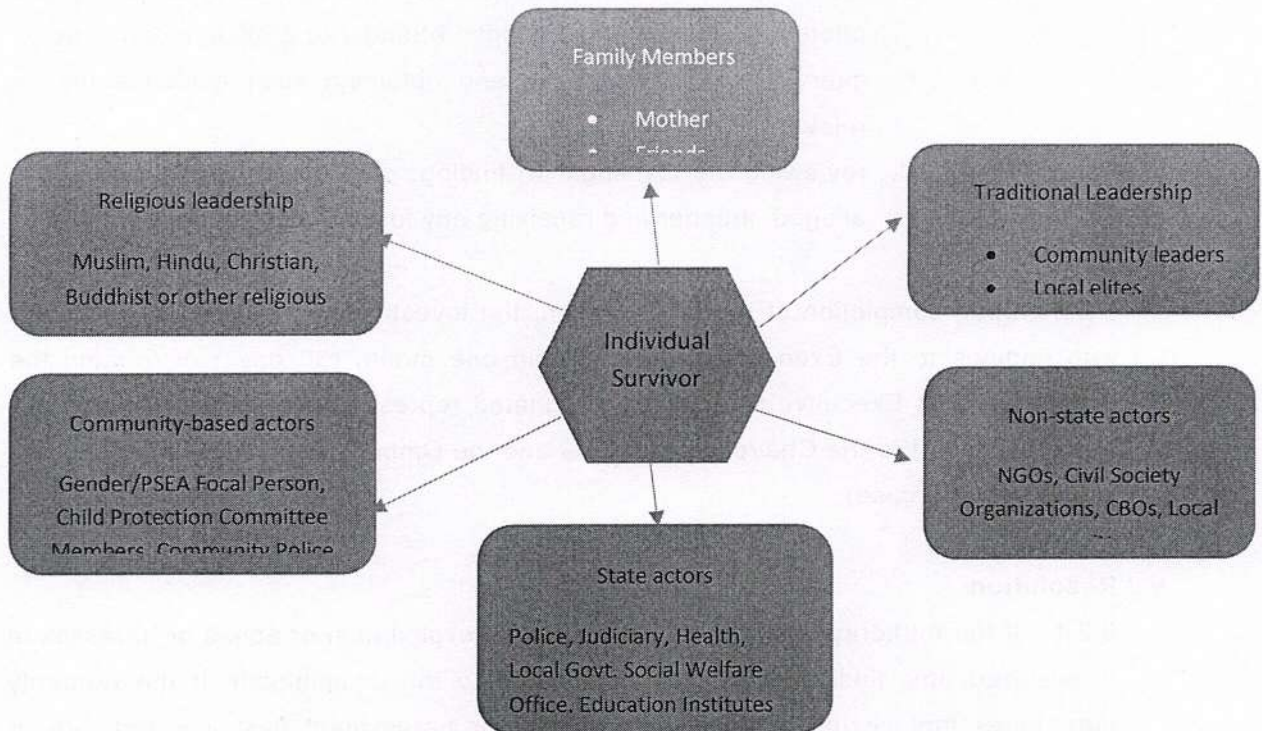
9.1.2 Community Based Complaints Mechanisms (CBCM): A community-based complaint mechanisms (CBCM) is a system blending both formal and informal community structures, built on engagement with the community where individuals are able and encouraged to safely report grievances, including sexual exploitation and abuse (SEA) and sexual harassment incidents.

Consent of the victim or survivor to receive victim assistance and to share information for accountability must be voluntarily and freely given based upon a clear appreciation and understanding of the facts, implications, and future consequences of an action.

Assistance provided to victims and survivors should be do no harm, confidentiality, safety and non-discrimination. Victims have the right to decide what assistance they need, and information should be provided regarding their full range of options. Assistance provided to victims and survivors should be by the guiding principles of do no harm, confidentiality, safety and non-discrimination. Victims have the right to decide what assistance they need, and information should be provided regarding their full range of options. The complain mechanism considers potential dangers/risks to all parties

- Incorporates ways to prevent injury and harm
- Includes ensuring confidentiality, offering physical protection and addressing potential retaliation

Figure: Members of CBCM



9.1.3 Role of Safeguarding Committee: If complaint made directly to the any members of BoG, Chairperson will be reported on the complaint. Chairperson will forward the issue to the Executive Director and or the Ombudsperson as feel appropriate. If complaint made to the Safeguarding Committee, after discussions with the complainant, the Safeguarding Committee will give an opinion on whether the facts as recited constitute sexual exploitation or abuse or harassment. Whatever the opinion, the complaint shall be placed to the Executive Director for appropriate action. Where the facts do suggest sexual exploitation or abuse or harassment, but the complainant does not wish to pursue the matter, the Executive Director may do so without the co-operation of the complainant, however the Executive Director may take into account the wishes of the complainant when deciding whether to proceed. Executive Director may forward the issue to the Ombudsperson if feel appropriate.

9.2 Investigation

9.2.1 Steps in Investigation Process: Once a formal complaint is made, the investigation will be conducted in a confidential and discreet manner as far as it is possible without hampering the investigation. Complaints will be investigated by the Safeguarding Committee. A complainant will be kept informed at all stages of the investigation and resolution. At all times throughout the investigation, the alleged offender and/or complainant will not be allowed to have any legal counsel as their representative. Necessary steps in conducting an investigation include:

[Handwritten signature]

- a. providing the alleged offender with a copy of the written complaint
- b. providing disclosure of the nature of the complaint to the alleged offender and inviting the alleged offender to provide a response
- c. interviewing all witnesses and obtaining such evidence that is relevant to the complaint
- d. reviewing the investigation findings with the complainant and the alleged offender and receiving any further information.

9.2.2 Upon completion of the investigation, the investigator should send the report with findings to the Executive Director within one month (30 days) of forming the committee. The Executive Director or designated representative within 48 hours will share the report to the Chairperson of BoG and the Ombudsperson (if Ombudsperson is involved into case).

9.3 Resolution

9.3.1 If the Authority determines that no sexual exploitation or abuse or harassment is occurred, this finding will be communicated to the complainant. If the Authority determines that sexual exploitation or abuse or harassment has occurred, proper disciplinary action will be taken according to this policy.

9.3.2 Upon receiving the decision from the Executive Director, the Safeguarding Committee or Sr./Specialist, Social Inclusion shall communicate the decision to the complainant and the accused. In all cases the action will be shared with the Chairperson of BoG and the Ombudsperson (if Ombudsperson is involved).

9.3.3 False Accusations If the investigation reveals evidence that the complainant falsely accused another of sexual exploitation or abuse or harassment, the complainant will be appropriately disciplined and the documentation will be retained on the complainant's personal file.

9.4 Maintaining a Written Record: Chair of The Safeguarding Committee shall maintain a written record of each complaint and how it was investigated and resolved. Records will be maintained in a confidential manner. A copy of whole documentation will be provided to the Director, People and Administrations/ Manager, HRD&M.

11. PROHIBITED RETALIATION

UCEP Bangladesh maintains a zero-tolerance policy for retaliation against anyone for reporting sexual exploitation or abuse or harassment, assisting in making a complaint, or participating in an investigation. Any staff, associate, or partner who makes a good-faith complaint of sexual exploitation or abuse or harassment, assists, testifies, or participates in any investigation or

proceeding or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his or her employment and will not be discriminated against or discharged for engaging in such activity.

Retaliation not only affects the recipient, but also can spread rapidly throughout UCEP Bangladesh. It destroys faith in UCEP Bangladesh's leadership and can damage employee morale.

Complaints of retaliation will be promptly investigated. If retaliation is substantiated, appropriate disciplinary action, including dismissal, will be taken.

12. PSEA AND PSH CODE OF CONDUCT

All UCEP Bangladesh staff, associates, and partners are expected to conduct themselves in accordance with the PSEA and PSH policy. Following are the core commitments relating to sexual exploitation and abuse and harassment that all staff, associates and partners are expected to follow. The following behaviours are prohibited:

11.1 SEXUAL ACTIVITY WITH CHILDREN AND VULNERABLE ADULTS: Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of the child is not a defence. Sexual activity with vulnerable adults, as outlined in the definitions, is also prohibited.

11.2 CHILD MARRIAGE: Any staff, associates, or partners who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEA and PSH policy. As per the definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence. Any staff married to a child under the age of 18 as per the custom or law of their country, before the UCEP Bangladesh PSEA and PSH policy came into force will not be subject to disciplinary action. UCEP Bangladesh, however, prohibits any such relationship from occurring once the PSEA and PSH policy came into effect.

11.3 SEXUAL ACTIVITY WITH UCEP BANGLADESH BENEFICIARIES: Sexual activity with any beneficiary is prohibited due to inherently unequal power imbalances. An UCEP Bangladesh beneficiary is defined as anyone who receives services or support from UCEP Bangladesh or an UCEP Bangladesh partner.

11.4 GROOMING AND/OR COERCION: Any grooming and/or coercion of a child or vulnerable adult for the purposes of obtaining sex is prohibited.

11.5 SEXUAL EXPLOITATION: Any form of sexual exploitation is prohibited including:

- Buying Sex: Exchange of money, material assistance, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitive behaviour is prohibited.

- Profiting from Sexual Exploitation: Any monetary, social or political gain from sexual exploitation is prohibited.

11.6 SEXUAL EXPLOITATION OR ABUSE OR HARASSMENT: Any act of sexual exploitation or abuse or harassment including unwelcome sexual advances or requests for sexual favours is prohibited both under the PSEA and PSH policy.

11.7 SEXUAL VIOLENCE: Any acts of sexual violence as outlined in the definitions in prohibited. This includes, but is not limited to, sexual violence including intercourse, sexual touching and threats of sexual violence.

11.8 PHYSICAL/EMOTIONAL ABUSE: As outlined in both the Child Protection and the Protection policies any physical or emotional abuse is prohibited. Additional prohibited behaviours related to abuse can be found in the UCEP Protection Policy.

This list may be expanded at any time and details will be communicated with staff, associates and partners through the Safeguarding Committee.

13. CONSEQUENCES

Any staff, associate or partner who is in violation of the PSEA and PSH policy will face disciplinary procedures, which may result in disciplinary action, termination of employment or contract and/or refer to the appropriate law enforcement agency or legal authority.

14. COMMUNICATION AND TRAINING

It is UCEP Bangladesh's responsibility to ensure that all staff, associates and partners are aware and fully compliant with the policy. In order to take the steps to prevent any forms of sexual exploitation or abuse, UCEP Bangladesh will ensure that:

1. Training is provided for all staff who has a specific responsibility for implementing this Policy and associated Procedure or who may be involved in dealing with complaints, which arise including CBCM.
2. Awareness raising training is provided to all staff, associates, communities and partners on PSEA. The training will equip staff, associates, communities and partners to develop awareness as well as an understanding of when and how to report any concerns.
3. Proactive steps are taken to communicate the zero-tolerance message.
4. All staff is informed of and trained in the policy and procedure.
5. All staff is aware of the definitions under this policy.
6. All staff is aware of reporting procedures.

7. All staff has signed and acknowledged that they have read and understood the policy.

15. SUPPORT FOR SURVIVORS

Support will be offered to survivors regardless of the outcome of any investigations. This support can include specialist psychosocial counselling and/or access to other specialist support as needed. Below is the list of organizations, not limited to, UCEP will refer survivors for providing legal assistance, counselling support and rehabilitation facilities as appropriate:

SL	Name of organization	Address	Email and Phone No.
1	Police Station	Relevant Police Station	
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- 01755555544, 01755556645, 01733219005 E-mail- vsc.dmp@dmp.gov.bd
3	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; 22 Phone PABX # 88-02-55013726- 28 FAX # 88-02-55013725; Help-Line: 16108 Email: info@nhrc.org.bd : complaint@nhrc.org.bd
4	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
5	Bangladesh Legal Aid and Services Trust (BLAST)	1/1 Pioneer Road, Kakrail, Dhaka1000, Bangladesh	Tel:0088-02-8391970-2, 8317185 Fax: 0088-02-8391973 Email: mail@blast.org.bd
6	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
7	Bangladesh Mahila Parishad	Sufia Kamal Bhaban, 10/B/I ,Segunbagicha, Dhaka-I 000	Phone # 88-02-9582182, 88-02- 9511904 Fax #88-02-9563529 Email: info@mahilaparishad.org

16. DEFINITIONS

1. **Sexual Exploitation:** The term "sexual exploitation" means an actual or attempted abuse of someone's position of vulnerability (such as a person depended on others for survival, food rations, school, books, transport or other services), differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic or political advantages as an incentives or form of coercion. It includes trafficking and prostitution.
2. **Sexual Abuse:** The term "sexual abuse" means the actual or threatened physical intrusion of a sexual nature including inappropriate touching, whether by force or under unequal or coercive conditions. It includes sexual slavery, pornography, child abuse, rape, sexual assault, unwanted and/or uninvited exposure to text images and so on, the sharing of images, demands of sexualized photographs etc.
3. **Sexual Harassment:** Sexual harassment affects personnel and is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation. When such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing whether the conduct causes offence, the perspective of the victim shall be considered.

Sexual harassment can take various forms – from looks and words though to physical contact of a sexual nature. Examples of sexual harassment (non-exhaustive list) include: attempted or actual sexual assault, including rape; sharing or displaying sexually inappropriate images or videos in any format; sending sexually suggestive communications in any format; sharing sexual or lewd anecdotes or jokes; making inappropriate sexual gestures, such as pelvic thrusts; unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against another person; staring in a sexually suggestive manner; repeatedly asking a person for dates or asking for sex; rating a person's sexuality; making sexual comments about appearance, clothing, or body parts; name-calling or using slurs with a gender/sexual connotation; making derogatory or demeaning comments about someone's sexual orientation or gender identity. (Ref: Writ Petition no- 5916/2018 Supreme Courte of Bangladesh).

4. **Child and vulnerable adults:** A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood. Vulnerable adults are defined as: Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or who, due to their

gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

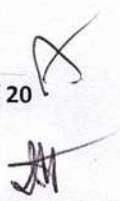
5. **Grooming:** Grooming is behaviour that an offender uses to procure sexual activity from a child. It can include building trust with children and/or their carers to gain access to children to sexually abuse them. Online Grooming: Grooming may be in person as above, or online where the groomer sends electronic messages with the goal of engaging the child in sexual activity.
6. **Coercion:** Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent. For example, while drunk, drugged, asleep or mentally incapable of understanding the situation.
7. **Physical Abuse:** Physical abuse occurs when a person purposefully injures or threatens to injure a child or vulnerable adult. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.
8. **Child Emotional Abuse:** Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

[Handwritten signatures and initials]

Annexure-A

Complaint Form

I, [name of complainant], working at [name of component/division/section], [address] have reasonable grounds to believe that [name of alleged harasser], working at [name of component/division/section], [address] has engaged in sexual exploitation or abuse or harassment at [address (es) of place(s) where alleged sexual exploitation or abuse or harassment took place] on or about [dates of alleged harassment] in contravention of UCEP's Policy on Sexual exploitation or abuse or harassment. Signed at _____ on _____ Complainant's Signature



Annexure B:

PSEA and PSH Code of Conduct Personal Declaration

I confirm that i have read, understood and shall abide by the code of conduct principles for the entire period I am working or associated with, and or represent, UCEP Bangladesh. I understand that violation of any of the above principles and elements in the code of conduct can, depending on the degree of severity, result in immediate disciplinary action which can include dismissal.

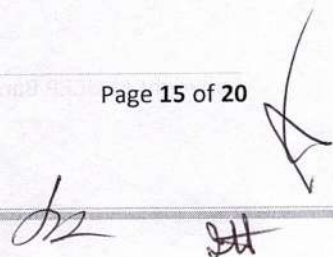
I will raise through appropriate channels any matter which appears to breach the standards contained within this code of conduct.

Signature

Name In Block Letters

Job Title

Date



Annexure-C

Incident Reporting & Documentation

This is an Initial cause for concern form which must be discussed with the PSEA Focal person within just 24 hours of the incident being reported.

1. Details Of Person Completing The Form

Name :-----

Organization Name:-----

Position:-----

Address:-----

Contact number:-----

Name/details of person who raised concern (if different from above)-----
--

2. Details Of Person Concern Is About

Name :-----

Organization Name :-----

Position:-----

Address:-----

Relationship to alleged victim-----

3. Details Of Alleged Victim

Name :-----

Organization Name:-----

Date of birth:----- Age at the time of incidence: -----

Address :-----

Contact number:-----

Any identified special needs of Victims:-----

Ethnicity-----

4. Details Of Incident

Date(s) or period (if over a drawn-out period) of incident -----

Description of the incident/s. Please include as much details as possible. If a child/adult talked to you, write down the exact details of the conversation, remember not to lead the adult. please include any other information including location, number of incidences, any witness details etc, please continue on a separate sheet of paper if necessary.

Any actions taken?

Please indicate if you are in contact with any other bodies concerning this incident and include a contact name, address and telephone number. Child/ Adult / Police / Other

Any other additional information

Signed

Date

Name of Focal Point/ Officer/ Manager:

Signed

Date

Handwritten initials/signature

Handwritten mark

Annexure-D

Indicative SEAH Business/Activity Risk Factors

	Risk factors	Potential considerations
Business/Activity risks	Personnel deployed:	<ul style="list-style-type: none"> • away from their usual location/country of residence • to remote/rural location/s • to a humanitarian or emergency setting
	Interaction with individuals, especially women, who:	<ul style="list-style-type: none"> • are young adults • have a disability • are of an ethnic, indigenous, religious or sexual minority • are experiencing poverty • are sex workers • are part of families impacted by disasters • are displaced, refugees, migrants or asylum seekers • are part of female headed households • are victims/survivors of trafficking and/or other forms of sexual and gender-based violence
	Circumstances where staff have access to sensitive/confidential personal information	For example: <ul style="list-style-type: none"> • health care providers • counselling services • humanitarian aid coordinators
	High risk activities	For example: <ul style="list-style-type: none"> • construction/infrastructure in developing country settings – these can have a higher risk of SEAH given the construction industry is male dominated; • humanitarian • disaster response • security in conflict or post conflict or disaster settings
	Provision of goods and/or services that may create a power imbalance	For example: <ul style="list-style-type: none"> • services for vulnerable groups of women (eg. escaping trafficking or gender-based violence) • food distribution • medical supplies • emergency supplies following a disaster • training • residential/shelter services • disability services • justice facilities • counselling and support services • community consultation (data collection, surveying, training) • parenting and child protection programs
	Staff or personnel who have an actual or perceived level of authority	For example: <ul style="list-style-type: none"> • security workers • police • teachers • aid workers • humanitarian workers • NGO personnel • security services
	Interaction with individuals, especially women, who:	<ul style="list-style-type: none"> • are young adults • have a disability • are of an ethnic, indigenous, religious or sexual minority • are experiencing poverty • are sex workers • are part of families impacted by disasters • are displaced, refugees, migrants or asylum seekers • are part of female headed households

	<ul style="list-style-type: none"> • are victims/survivors of trafficking and/or other forms of sexual and gender-based violence
Circumstances where staff have access to sensitive/confidential personal information	<p>For example:</p> <ul style="list-style-type: none"> • health care providers • counselling services • humanitarian aid coordinators
High risk activities	<p>For example:</p> <ul style="list-style-type: none"> • construction/infrastructure in developing country settings – these can have a higher risk of SEAH given the construction industry is male dominated; • humanitarian • disaster response • security in conflict or post conflict or disaster settings
Provision of goods and/or services that may create a power imbalance	<p>For example:</p> <ul style="list-style-type: none"> • services for vulnerable groups of women (eg. escaping trafficking or gender-based violence) • food distribution • medical supplies • emergency supplies following a disaster • training • residential/shelter services • disability services • justice facilities • counselling and support services • community consultation (data collection, surveying, training) • parenting and child protection programs
Staff or personnel who have an actual or perceived level of authority	<p>For example:</p> <ul style="list-style-type: none"> • security workers • police • teachers • aid workers • humanitarian workers • NGO personnel • security services

Annexure-E:

PSEA Reporting Process/flow of UCEP Bangladesh

