Child and adult safeguarding policy

Signature line Habitat for Humanity® Signature line

Policy introduction

Habitat for Humanity Bangladesh is a nonprofit, ecumenical Christian organization dedicated to eliminating substandard housing and homelessness worldwide and to making adequate, affordable shelter a matter of conscience and action. Our ministry was founded on the conviction that every man, woman and child should have a simple, decent place to live in dignity and safety. In accordance with our foundational mission and principles, we are committed to the highest ethical standards and oppose all forms of abuse, discrimination, exploitation and harassment ("harm").

This Child and Adult Safeguarding Policy — also referred to herein as the "safeguarding policy" or the "policy" — reflects our pledge to create and maintain a work and life environment that is safe, productive and respectful for the children and adults we serve. As a Christian organization rooted in undoing policies and practices embedded within institutions, organizations or society that prevent people from accessing opportunities and promoting housing equity, we believe that every child and adult with whom we have contact, whether intentional or incidental, has the right to be protected from any harm that can arise during our operations or project activities. Moreover, we recognize the unique vulnerabilities of children and at-risk adults living in fragile contexts and remain steadfast in our commitment to be a safe organization for all whom we serve or with whom we have contact.

This policy defines Habitat Bangladesh's approach to creating safe, healthy workplace, operational and project environments. The accompanying Child and Adult Safeguarding Procedures document — also referred to as the "safeguarding procedures" — provides guidance on how operational and project teams can make this policy actionable and adapt practices for the contextual needs and risks associated with the project and/or community. The directives contained in this policy, unless specified otherwise, are intended to apply to the conduct of Habitat Bangladesh's representatives, as defined in Appendix A.

Policy framework

We recognize that building and sustaining a safe organization requires a commitment to children, families who partner with Habitat, community members, partners and our colleagues. This policy establishes our commitment to children, at-risk adults in communities where we operate, and our staff and volunteers by referencing and acknowledging the role of other policies in reinforcing Habitat Bangladesh's responsibility to create and maintain operational, programmatic and workplace environments that are safe, mission driven and healthy for everyone. Our Safeguarding Policy Framework organizes safeguarding-related policies, procedures and materials in a way that is accessible and user-friendly. This framework includes but is not limited to the following policies and materials:

1. Habitat Bangladesh Child and Adult Safeguarding Policy
2. Ethics Covenant (Code of Conduct)
3. Policy on Harassment, Bullying, & Discrimination
4. HOME Policy
5. Anti- Trafficking in Persons Policy of HFHI
6. Whistleblower Policy
7. Background Screening Policy
8. Volunteer Code of Conduct
9. Safeguarding Self-Assessment

10. Safe Recruitment for Employment Toolkit
11. Safer Programming Guidance Note
12. HFH Survivor Support Framework

Policy statement

Every person — child or adult — has the right to be treated with dignity and respect. We recognize and acknowledge our duty of care — our organizational, collective and individual responsibilities to safeguard children, families who partner with Habitat, program participants, community members with whom we have contact, and our colleagues and volunteers. This safeguarding policy has been developed as part of our safeguarding framework to reinforce the principles of "do no harm" and gender equality and is part of our risk-based approach to preventing and deterring unintentional or deliberate behaviors, actions or programming by Habitat Bangladesh representatives that create a risk of or result in child and adult abuse; discrimination; sexual exploitation, abuse and harassment, or SEAH; and labor exploitation. Habitat Bangladesh] maintains a zero tolerance approach for any abuse of power. All concerns, suspicions or known abuses of power must be reported in accordance with reporting protocols. Our Whistleblower Policy prohibits retaliation against any reporter acting in good faith, even if the allegation is later unsubstantiated.

We acknowledge that inherently unequal power dynamics exist between Habitat Bangladesh and children, families who partner with Habitat, and adults living in the communities where we operate. Housing inequities, disaster responses and community impact projects increase the likelihood of power being abused. Therefore, Habitat Bangladesh strictly prohibits sexual activity with any person under the age of 18 years old, regardless of the legal age of consent in the country where the child lives or the contact occurs. Mistaken belief in the age of the child is not a defense. Habitat Bangladesh also prohibits sexual activity with any program participant, project recipient or community member. And, during the project implementation period, sexual activity and relationships between and among staff members and volunteers who meet through the Habitat Bangladesh project are strongly discouraged. Volunteers must also adhere to the policies restricting relationships with community members unless they live in and are from the community.

When any abuse of power is reported, we maintain a zero tolerance for inaction approach. This means reports will be treated seriously, triaged and investigated in accordance with the respective Habitat Bangladesh and Habitat for Humanity International investigations and disciplinary procedures. All legal actions will be pursued in consultation with the affected person. Where the affected person is a child, the child and the child's parent, legal guardian or caregiver will be consulted, and Habitat Bangladesh will pursue the necessary legal action to uphold the best interests of the child and comply with the governing local or national laws. Habitat Bangladesh is committed to preventing a person from working with children if they pose a threat to children.

Policy scope

This policy applies to all Habitat for Humanity entities, including headquarters, area offices, branches and consolidated entities. In addition, every legally independent national organization and affiliated organization outside the U.S. is required to adopt its own policies that incorporate the provisions of this policy to the extent permitted by applicable local law and to ensure that the intent of this policy is covered in the entity's existing policies. U.S. affiliated organizations remain subject to existing Policy 34 of the U.S. Affiliated Organization Policy Handbook. Habitat Bangladesh representatives must review the policy, complete the Individual Acknowledgment Form, and submit the completed form to their safeguarding country focal point / HR Manager. Every Habitat branch and national organization must sign the Policy Acknowledgment Form upon receipt or adoption of the policy or any updates and submit the acknowledgment to the entity's respective area office safeguarding regional adviser and Governance, Risk Management and Compliance, or GRC, representative.

All Habitat Bangladesh representatives are required to read, acknowledge and comply with this policy. Habitat Bangladesh representatives are responsible for understanding how safeguarding is applicable to their roles and responsibilities and for taking appropriate steps in accordance with this policy and its accompanying procedures to mitigate identified safeguarding risks.

Treating others with dignity and respect is a value that extends beyond working hours. Habitat Bangladesh representatives are expected to engage in the highest ethical standards during interactions with each other, our partners, families who partner with Habitat, and community members. This policy and its commitments are applicable to both the professional and personal lives of our representatives. Ethical behaviors by all Habitat representatives are expected 24 hours a day, seven days a week, including before, during and after business hours. Failure to comply with these standards is grounds for disciplinary action, which may be considered as gross misconduct and may result in termination.

Implementation

Safeguarding principles[1]

By living our values of humility, courage and accountability, we create safety for our colleagues, children, families who partner with Habitat, community members, and our partners. We ask that each Habitat Bangladesh representative reflect on how they can contribute to a healthy organization and safeguard those with whom they have contact from preventable harm.

1. We will work **in community** with children and adults to promote and uphold their rights to be protected from harm during our operations and project activities.
2. We will engage children and adults with **empathy** and treat each person with respect, courtesy and dignity.
3. We recognize the inherently unequal power dynamics between Habitat Bangladesh and the communities where we operate and the particular **vulnerability** to abuses of power that these differentials create. Any abusive, harassing, humiliating, degrading, discriminatory or exploitative behavior demonstrated by our representatives toward any person is unacceptable.
4. We acknowledge the power we hold and the **trust** that has been given to us. We will not engage in any abuse of power or trust that harms[2] children or adults in the community.
5. We believe in creating systems of **transparency** to build safe and healthy operating environments with the aim of preventing child abuse; sexual exploitation, abuse and harassment, or SEAH; discrimination; and labor exploitation.
6. We will continue to evolve our safeguarding practices and engage colleagues with humility and **grace** as we learn and make adjustments to strengthen our safeguarding systems.

Behavioral commitments[3, 4, 5]

1. We will work to create and maintain safe and healthy working environments that prevent sexual exploitation, abuse and harassment and promote the implementation of the Habitat Bangladesh Code of Conduct. Managers across all levels of the organization have particular responsibilities to support and develop systems that maintain a healthy workplace culture and environment.
2. We recognize that acts of sexual exploitation, abuse and harassment, or SEAH, constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract.
3. We prohibit sexual activity, including any direct or indirect contact or grooming, with any child (a person under 18 years old) regardless of the age of majority or consent in the local context. Mistaken belief regarding the age of a child is not a defense.

[1] Principles 1-6 reflect Habitat for Humanity's organizational values and HOME commitments to transformational change adapted for safeguarding: community, empathy, vulnerability, trust, transparency and grace.

[2] This includes any sexual, physical, psychological, spiritual, social, financial or communal harms because of misconduct by a Habitat representative or failure to mitigate risks that lead to harm via safer programming.

3 See Appendix C for the detailed Safeguarding Behavioral Commitments Acknowledgment.

4 Commitments 1-6 address protections from sexual exploitation, abuse, and harassment, or PSEAH, as articulated by the IASC Six Core Principles and adapted for Habitat for Humanity.

[5] Commitments 7-10 reflect the importance of the safeguarding pillars and additional behavioral prohibitions.

4. We prohibit the exchange of money, employment, goods, special considerations or services for sex,[6] including sexual favors or other forms of humiliating, degrading or exploitative behavior. This includes any assistance that is due to families who partner with Habitat, program participants or recipients, or other community members.
5. We prohibit any sexual relationship between a Habitat Bangladesh representative and any person benefiting from Habitat Bangladesh programs or projects. We recognize that this type of relationship is improper because it is based on inherently unequal power dynamics, thus undermining the credibility and integrity of Habitat Bangladesh's charitable mission.
6. We will maintain an organizational mandate that if a Habitat Bangladesh representative has a concern or suspicion about, or knows that a colleague has engaged in, SEAH or any other unsafe or harmful behavior, whether in the same organization or not, they must report their knowledge or concern via the Habitat Ethics and Accountability Line, or HEAL, or complaints and feedback number: 01732770622; Email to feedback@habitatbangladesh.org immediately or within 24 hours. All concerns reported in other available mechanisms will also be reported via HEAL.
7. We prohibit modern slavery or any trafficking of people — children or adults — for procurement of commercial sex acts; commercial sexual exploitation of children, or CSEC; or forced labor.
8. We have zero tolerance for any representative accessing, possessing or circulating pornographic materials or indecent content, images, videos or messages of children or adults using phones, computers, email accounts, electronic distribution lists, Habitat Bangladesh paid internet connections, or VPN services. Inappropriate content sent to an individual or group via text containing explicit language, messages or jokes will not be tolerated.
9. We actively support the legal prosecution of individuals in cases of substantiated misconduct if doing so is consistent with the wishes of the affected person or, where the victim is a child, it is in the best interests of the child.[7]
10. We engage a trauma-informed, person-centered approach to consult with anyone harmed by misconduct involving a Habitat Bangladesh representative or unsafe programming. The provision or referrals for care will be made in accordance with the person's wishes. We recognize that children have the right to express their views, and for those views to be considered and reflected in decisions for their care.[8]
11. We respond to all reports and investigate allegations, as necessary, to ensure accountability and administer proportionate discipline in cases of substantiated misconduct.

Safeguarding pillars

Habitat Bangladesh has a commitment to ensure that our operations and programs are safe for children, families who partner with Habitat, community members, and Habitat Bangladesh representatives and volunteers. All representatives are prohibited from engaging in any abuse of power. In furtherance of this policy, our safeguarding procedures describe activities to make this policy and our commitments actionable.

- **Governance and culture:** We will foster a safeguarding culture to protect children, at-risk adults, community members, and Habitat Bangladesh representatives from harm that may arise during our operations or project activities. As we continuously learn and evolve our safeguarding approaches and systems, we will adopt a structure to support us in the achievement of our safeguarding objectives. Our leadership will remain steadfast in its commitment to safeguarding and prioritization of best practices, accountability and risk management.[9]
- **Prevention:** We will implement best practices to reduce the likelihood of safeguarding breaches. We will ensure safeguarding is mainstreamed across all departments and functions and is integrated throughout the project life cycle.
- **Training and awareness:** We will deliver and make accessible the necessary safeguarding training so that all Habitat Bangladesh representatives understand their responsibilities for protecting children, adults and community members from foreseeable and preventable safeguarding risks. Habitat Bangladesh representatives

[6] Soliciting or paying for sex online or in person, even where sex work or prostitution is legal, is a breach of this policy and will be addressed through investigation and disciplinary procedures.

[7] Article 3, Section 1 of the United Nations Convention on the Rights of the Child (UNCRC).

[8] Adapted from United Nations Protocol on the Provision of Assistance to Victims of Sexual Exploitation and Abuse.

[9] Safeguarding will be a part of the risk-based approach across all practices, including internal audits.

will understand their obligation to contribute to healthy office, operational and program environments to protect each other from workplace harms. We will ensure that communities are aware of the Habitat for Humanity International Ethics Covenant in order to socialize their right to be protected from harm that may arise during Habitat Bangladesh operations and activities.

- **Reporting:** We commit to educating all Habitat Bangladesh representatives about their responsibilities for reporting any concerns, suspicions or known safeguarding incidents. We will ensure that safe, confidential and accessible reporting channels are available to representatives, and we will encourage families who partner with Habitat, children, at-risk adults, and community members to share their concerns through the preferred reporting method.
- **Response:** We will act swiftly and with care whenever a safeguarding allegation is reported. We will prioritize the care and needs of any child or adult affected or harmed by misconduct or unsafe programming conditions and consider the wishes of the affected person through consultative decision-making. Trauma-informed practices will be applied to all investigations and case management activities, and disciplinary actions will be consistent and proportionate to any allegation that is substantiated. We will hold all information confidential and share information only when required by established legal, regulatory or donor mandates.

Governance

The Habitat Bangladesh board of directors will exercise oversight to ensure adoption and implementation of the Safeguarding Policy. The National Director is accountable for prioritizing safeguarding objectives and delivering organization wide communications about this policy and the accompanying procedures. The HR Department and Compliance is accountable for the implementation and management of this policy. The global senior director of safety and security and safeguarding is responsible for the development of the safeguarding strategy and may delegate implementation,[10] monitoring and evaluation activities to the global safeguarding director and regional safeguarding advisers.

Roles and responsibilities

- **Habitat for Humanity International global senior director of safety and security and safeguarding:** This role is responsible for keeping the senior leadership team apprised of the safeguarding strategy, any needed changes to the policy and procedures, and progress on key performance indicators, or KPIs. This role will partner with Housing Opportunity and Mission Engagement, or HOME; Monitoring, Evaluation, Accountability and Learning, or MEAL; Legal; and Governance, Risk Management, and Compliance, or GRC, teams to ensure a holistic and mainstreamed approach to safeguarding.
- **Habitat for Humanity International global safeguarding director:** This role is responsible for the day-to-day implementation and monitoring of the policy and procedures and for developing global safeguarding objectives to be reflected in the KPIs.
- **Habitat for Humanity International regional safeguarding adviser:** This role is responsible for supporting the mainstreaming of the policy and procedures within the respective region. The adviser offers technical assistance to ensure implementing teams have the necessary knowledge, tools and materials to integrate safeguarding as needed. Regional and country-specific KPIs will reflect global objectives and will be identified by the regional safeguarding advisers in coordination with the global safeguarding director.
- **Habitat for Humanity International Governance, Risk Management and Compliance, or GRC:** This function is responsible for providing guidance on safeguarding risk management and managing reported concerns and subsequent investigations in coordination with the global safeguarding director and respective safeguarding adviser.
- **Habitat Bangladesh safeguarding focal points:** This role is responsible for coordinating and championing the mainstreaming of safeguarding, whether at the country, affiliate or program level. Primary responsibilities of

[10] Implementation for the respective safeguarding mitigations remains the responsibility of all leaders and each HFHI representative in their specific roles and contexts. This language is meant to identify responsibilities at the governance level.

focal points include delivering training and ensuring that representatives and community members can access reporting channels.

- **Habitat Bangladesh human resources:** This function is responsible for hiring and onboarding candidates, tracking the completion of mandatory training, managing personnel/disciplinary records, and applying personnel action whenever a safeguarding breach has occurred.
- **Habitat Bangladesh managers:** These roles are responsible for ensuring that their respective teams mainstream and implement the safeguarding procedures. Managers will ensure that project teams complete safeguarding risk assessments and develop mitigation and monitoring plans that are evaluated throughout the project life cycle. If a manager is told, learns about or witnesses a safeguarding incident, they must ensure that the allegation, including any unsafe programming concern, is reported to HEAL.
- **All Habitat Bangladesh representatives:** Our safeguarding values and principles codify the behaviors to which every representative is expected to understand and conform. All representatives are expected to be able to recognize and be alert for the signs of potential safeguarding misconduct and have an obligation to report any concern, suspicion or known safeguarding breach as outlined in this policy and to cooperate with any subsequent investigation.

Pillars of safeguarding[11]

Governance and culture

Standard 1: Fostering a culture of safeguarding

- **Policy review:** Our Safeguarding Policy and its procedures will be reviewed at a minimum every four years to ensure they evolve with and meet the requirements of the sector.
- **Annual review and verification, or ARV:**[12] To support a culture of safeguarding accountability, Habitat Bangladesh will complete an ARV to acknowledge compliance with the Safeguarding Policy and its procedures. The ARV will use the standards outlined in this policy to inform the annual safeguarding plan. Any gaps that have been identified will be documented in an annual safeguarding plan with assigned roles, responsibilities and timelines to meet the requirements of the standard.
- **Board designation:** Habitat for Humanity International has developed a structure to ensure that safeguarding is prioritized and integrated across our work at all levels. Habitat for Humanity International's board of directors and Habitat Bangladesh will designate a safeguarding board/ SLT representative to enhance the visibility and prioritization of child and adult safeguarding by serving as an advocate within the board /SLT and Habitat Bangladesh. The representative will receive periodic updates on the status of safeguarding within Habitat Bangladesh. Additionally, the representative will oversee safeguarding improvements, controls and processes and will ensure the board considers safeguarding in its decision-making processes.
- **Safeguarding strategy and personnel:** To drive strategy and ensure implementation of day-to-day safeguarding measures, the global senior director of safety and security and safeguarding, with the support of the global safeguarding director, regional advisers and program- or location-specific focal points, will work with other functions and departments to meet their safeguarding roles and responsibilities.
- **Leadership responsibilities:** Our senior leadership team will ensure that safeguarding is a recurring agenda item for all regularly scheduled meetings and any safeguarding-related discussions or decisions are reflected in meeting minutes.
- **Communications and fundraising guidelines:** We are committed to preventing harm that may ensue as a result of the use of images, videos and stories in internal/external communications and fundraising. The use of photos, videos or storytelling, especially of children and at-risk adults on personal social media accounts, is strongly discouraged. In particular, we understand the ethical responsibility to represent children, adults and community members with dignity, respect and resiliency. We will not tolerate imagery or storytelling that

[11] The safeguarding procedures provide guidance on making the safeguarding pillars actionable.

[12] Aligned with the Annual Safety and Security Assessment.

reinforces negative stereotypes. All images, videos and stories will comply with the communications and fundraising guidelines set forth in our safeguarding procedures.

Standard 2: Establishing accountability

- **Personnel:** All Habitat Bangladesh representatives will receive and acknowledge the policy. Records of this acknowledgement will be maintained by Human Resources. We will ensure that all representatives understand and fulfill their responsibilities to safeguarding through our annual performance review process.
- **Budgets:** Habitat Bangladesh will fund operational and resourcing costs for safeguarding personnel and related activities.
- **Key performance indicators, or KPIs:** Metrics to evaluate KPIs are critical to support a culture of safeguarding engagement and knowledge and to support decision-making. KPIs will be assessed over time and evolve alongside our safeguarding culture and practice.
- **Board engagement:** The board will play a key role in driving the organizational prioritization of safeguarding. On a regular basis, the board will review the status of safeguarding and make recommendations for improvements, as needed.

Standard 3: Risk management

Safeguarding is integral to our Risk Management Framework, and our risk appetite for safeguarding breaches is very low. The framework is supported by our Enterprise Risk Register, or ERR, and program-level safeguarding risks assessments, or SRAs. Our ERR is a top-down approach that aims to identify general safeguarding risks, assess our organization's capacity for managing the risks, and implement mitigation measures to guard against safeguarding breaches that may interfere with our operations and projects and/or lead to serious harm of a child, adult, community member or Habitat representative. The SRAs contextualize our safeguarding practice to specific projects so that we can reduce the likelihood of child abuse; sexual exploitation, abuse and harassment; discrimination; and labor exploitation as we engage with communities. Through our risk-based approach, we embed these risk management practices into Habitat Bangladesh's at all levels and ensure these practices are consistently applied, monitored and evaluated. We recognize the active commitment that robust risk assessments demand, and we will support our representatives to apply a risk-based lens throughout the project life cycle, whereby we design, implement, measure and adjust safeguarding practices according to the associated risks.

Our belief in prevention through risk management applies not only to Habitat Bangladesh staff members and volunteers, but also to our partners and others working on our behalf. We will ensure that risk management obligations are clearly communicated to contractors, vendors, suppliers and implementing downstream partners, and we will share safeguarding risks and mitigation plans whenever possible and practical.

Prevention

Standard 4: Safe recruitment

Safe recruitment practices will be routinely applied to ensure that every candidate is suitable to work with children and at-risk adults living in fragile contexts, and that they are able to live our values by contributing to a safe and healthy workplace culture. Our commitment to safer recruitment includes:

- Contextualized job descriptions.
- Notice of safeguarding commitments within the job advertisement.
- Recruitment of multicultural and gender-balanced teams to promote equality and safety and reflect the populations we serve.
- Robust interviewing practices where safeguarding is a core and consistent part of the process.
- Thorough reference check questions to assess attitudes, behaviors and commitment to safeguarding.
- Background record check or self-declaration if permitted by local law.

Our safeguarding procedures and Safe Recruitment Employment Toolkit provide guidance for Human Resources and hiring managers.

Standard 5: Safer programming

Safer programming practices reflect Habitat Bangladesh's commitment to identify risks and prevent safeguarding breaches throughout the project life cycle. All project and program proposals include child and adult safeguarding considerations with accompanying resources to support cross-cutting and contextual safeguarding activities. During program design, our teams will ensure that risk assessments, mitigation measures and monitoring plans have been developed in collaboration with regional safeguarding advisers or designated safeguarding focal points, as needed, to ensure a robust and holistic safeguarding assessment at the onset. Additionally, all project designs will include donor-specific requirements to fulfill obligations and meet compliance standards. In addition to the Safer Programming Guidance Note, documents and materials that support our safer programming approach include:

- Project proposals
- Project design
- Budgeting
- Project risk assessments
- People centered analysis
- Gender analysis
- Safeguarding work plans (for projects)
- Safer programming checklist

Standard 6: Safe partnerships

We will undertake the necessary steps to ensure that downstream partners undergo a due diligence assessment to the nature and extent of their engagement, to help ensure compliance with minimum safeguarding standards and/or identify areas for capacity building. All downstream partners must have their own Safeguarding policy. In absence of such policy, they shall formally adopt and adhere to Habitat Bangladesh's Child and Adult Safeguarding Policy. Partner agreements include a safeguarding clause outlining required actions and responsibilities for carrying out projects in accordance with Habitat Bangladesh's Child and Adult Safeguarding Policy or the partner's own policy, whichever offers greater protections to children and adults in fragile contexts. Partners are responsible for assuming a risk-based approach to projects, and Habitat Bangladesh will collaborate with partners to identify, mitigate and monitor risks that are likely to arise during the project life cycle.

All partners agree to train their representatives on safeguarding with a focus on prevention, awareness, reporting and response obligations. The partner can request Habitat Bangladesh to support in capacity building, wherever needed. Partners may agree to adopt Habitat Bangladesh's reporting systems or develop their own reporting channels. Regardless of the elected reporting mechanisms, partners must share all reported concerns affecting Habitat Bangladesh funded activities within 48 hours or two business days. In addition, partners will disclose the findings of all completed investigations on Habitat Bangladesh funded activities within five business days of conclusion. The partner report shall include the outcome of the investigation, along with any personnel or organizational action taken to address the misconduct and reduce the likelihood of recurrence.

Partners must agree to take the necessary action to respond to reported concerns swiftly and with care, exercising recognized standards for delivering supportive care and services, mobilizing an investigation (as needed), taking remedial personnel action, and documenting management responses for all substantiated allegations.

Standard 7: Volunteer management

Volunteers are expected to contribute to safe and healthy project environments. All volunteers, whether children, youth or adults, are prohibited from engaging in behaviors that create *a risk of* or *actually result in* harm, as outlined in our Volunteer Code of Conduct. All Habitat volunteers are expected to respect the rights of children and adults and to protect them from harm throughout the volunteer commitment. The safeguarding principles and behavioral commitments outlined in this policy apply to volunteers of all ages, backgrounds and abilities.

Habitat Bangladesh vets volunteers based upon guidance and/or legal requirements in the country where they reside. Upon selection, volunteers will complete contextualized safeguarding training, and an appropriate supervision plan will be developed for every project involving volunteers, especially where children are present.

We believe that child and youth engagement is important. For this reason, we have created child engagement guidance, outlining active supervision standards, ratio requirements and child labor restrictions to ensure the safety and well-being of children on or off work sites and during activities.

Standard 8: Community engagement and child participation

Community engagement is an important part of creating a safeguarding culture that encourages partnership with the community and seeks to include child participation so that projects are child- and adult-focused *and* community-driven. Habitat Bangladesh will ensure that communities — especially children and adults in fragile contexts — understand and exercise their right to be protected against child abuse, discrimination, SEAH, labor exploitation or other forms of harm. Habitat Bangladesh will work strategically with other functions to partner with communities in meaningful and sustainable ways. To identify existing vulnerabilities and risks, Habitat Bangladesh will engage in community assessments whereby we will meet with key stakeholders, including but not limited to children; women; LGBTQI+; people with disabilities; people in ethnic, racial, religious and cultural minorities; and elders, to understand the local context.

We recognize the strength and capabilities of the people we serve and the communities where we operate. We are committed to listening to their voices — individual and collective — to apply their suggestions and feedback and share our power across the continuum of decisions that affect the lives of community members. Through our monitoring and evaluation protocols, we will seek feedback on safeguarding from children and adults and schedule regular focus group discussions to raise visibility about their rights.

Training and awareness

Standard 9: Training and management responsibilities

- **Mandatory training:** Safeguarding induction training is mandatory as part of onboarding for all Habitat Bangladesh staff members, volunteers and board members within 90 days **and** prior to contact with children, families who partner with Habitat, and community members. Representatives who have not completed the safeguarding induction will not be able to work in communities until verification of training has been completed. The safeguarding induction training will engage representatives so that they are able to prevent, recognize and detect, report, and respond to any concerns, suspicions or known incidents of a child or adult safeguarding breach.
- **Contextualized training:** Project teams, including disaster and emergency response, may be required to engage in contextualized training in addition to the mandatory induction.
- **Refresher training:** Refresher safeguarding training is required every two years for general staff members and key volunteers. Project teams may be required to complete supplemental and/or contextualized safeguarding training more frequently, in accordance with project risks and donor requirements.
- **Managers:** As part of their responsibilities for creating and maintaining a safeguarding environment, managers are responsible for ensuring their team members complete all required training. Managers must also communicate any safeguarding-specific responsibilities that team members have during the life cycle of the project.
- **Implementing partners, contractors and suppliers:** For information related to training for implementing partners, contractors and suppliers, please review Standard 6.
- **Visitors:** All casual visitors and visiting Habitat Bangladesh staff members are given a verbal safeguarding briefing before visiting a project site. Whenever possible and according to local practice, visitors will sign the Code of Conduct and/or Safeguarding Policy.

Standard 10: Raising awareness

- **Awareness materials:** Signs or posters will be affixed in all Habitat offices and at work sites with messaging about the "do no harm" principle and information on how to report a safeguarding allegation. Such messages may include "zero tolerance" for child abuse, SEAH, labor exploitation, and other human rights abuses; the right of community members to be protected from such harms; and Habitat's prohibition against the exchange of services or resources for sex or exploitative labor (e.g., drawing a distinction between sweat equity and forced labor).

- **Availability of information:** Safeguarding information and policies will be available in local languages. Materials will be child-friendly and understandable across a range of cognitive and developmental abilities. Words and concepts used in awareness-raising materials will be adapted to the local context. Communities will have access to information about the safeguarding risks and project benefits associated with Habitat's work in the community.

Reporting

Standard 11: Reporting procedures and mechanisms

We endeavor to prevent harm through the activities outlined in this policy and its accompanying procedures. We also recognize that in our endeavor to reduce safeguarding incidents from occurring or recurring, our representatives have the responsibility of detecting and reporting concerns, as early as possible, to interrupt harms to children, at-risk adults, community members and our colleagues, whether internal or external to Habitat. All Habitat offices are expected to adopt clear management protocols and procedures on how to manage a safeguarding concern.

- **Responsibility to report:** All Habitat representatives, especially managers, have the responsibility to report *any* conduct or unsafe programming activities that may be a breach of this policy or its procedures.
- **Whistleblower Policy:** Habitat Bangladesh's Whistleblower Policy expressly prohibits retaliation and protects representatives engaged in good faith reporting from retaliation or any threat of retaliation by any other Habitat representative. Any person who engages in retaliation will be subject to discipline, up to and including termination of employment. (*Note: Intentional submission of false allegations is a fraudulent activity and will be handled in accordance with Habitat* Bangladesh*'s policies.*)
- **Failure to report:** We recognize our collective duty to create safe, healthy work and project environments. Failure to timely report a safeguarding concern, suspicion or known incident will be subject to discipline, up to and including termination of employment or contract. Failing to report is a serious breach of this policy and leaves the child, at-risk adult, community member or colleague experiencing the alleged harm vulnerable to further harm without appropriate and timely intervention.
- **Reporting misconduct or unsafe programming:** Any Habitat Bangladesh representative who receives a safeguarding complaint or who has knowledge or reasonable suspicion of safeguarding misconduct (whether by an Habitat Bangladesh representative or any other organization's representatives operating in the local context) or who knows of any unsafe programming risks must engage the following protocol:
  - **How to report:** Inform their direct supervisor of the concern, suspicion, incident or complaint. If the representative has reason to believe that their direct supervisor may either be involved in the misconduct or has a conflict of interest in connection with it, the reporting party may report to:
    - A higher-level supervisor in their reporting line; or
    - The global or area office safeguarding officer, the local safeguarding focal point, a Human Resources Officer, the Governance Risk and Compliance department, the HFHI Internal Audit department; or
    - The Habitat Ethics and Accountability Line, or HEAL (e.g., internal reporting channel).
    - Reports can also be made to: Feedback and complaint: feedback@habitatbangladesh.org and phone number: 01732770622.

    All reported concerns and allegations received by a safeguarding adviser, officer or focal point; any manager, supervisor or HR personnel; or any member of the GRC or Internal Audit must be entered into HEAL within 24 hours of notice.
  - **Confidentiality and anonymity**: Report a concern anonymously or in name. A representative may choose to report a concern anonymously — in other words, without identifying who they are. When a report is made anonymously, Habitat Bangladesh has no means for identifying or attributing the source of the information. Whether the reporter wishes to be anonymous or identified, all safeguarding reports are confidential.
  - **Timing:** All Habitat Bangladesh representatives are required to report any safeguarding concern as soon as it becomes known but, in any case, within 24 hours or one business day.

- **Local reporting mechanisms:**[13] Habitat Bangladesh will ensure that there are project-specific, local reporting mechanisms that are functional and confidential for all children, adults, community members and Habitat for Humanity International representatives to access.
- **Report management:** All reported concerns of unsafe programming or alleged safeguarding misconduct are managed through HEAL. It is critical that any concern, suspicion or known incident is reported in a timely manner to ensure that that GRC within Habitat for Humanity International and Habitat Bangladesh can mobilize a response to interrupt harm, address any imminent safety issues, and deliver time-sensitive care and services. HEAL is Habitat for Humanity International's confidential, anonymous reporting hotline and central tracking repository for allegations of serious misconduct made by or against any Habitat stakeholder anywhere in the Habitat for Humanity International network.
- **Reporter's responsibilities:** Because of the sensitivity of safeguarding, anyone reporting a concern ("reporter") must **not** start an investigation on their own or engage in investigation-type activities. Reporters are responsible for reporting information shared with them or events that they heard or witnessed directly but should refrain from gathering evidence or questioning the child, adult or staff member affected by the alleged misconduct or unsafe programming activity. Furthermore, reporters must not inform or question potential witnesses or the person who has allegedly engaged in misconduct.
- **Community feedback loop:** Whenever safe and practical, Habitat Bangladesh will provide feedback to the community about reported safeguarding incidents to ensure transparency and accountability in the management of each concern. Because of confidentiality, it will not be possible to share specific information without the full informed consent of the person affected, including assent from any affected child. The regional safeguarding adviser or a designee will collaborate with the MEAL team to design a feedback loop as part of the local community feedback and reporting mechanism, or CFRM.
- **External reporting to authorities, donors or the public:** Where required or appropriate because of a contractual, legal or other donor obligation, there are circumstances where it is required or appropriate for Habitat Bangladesh's and/or Habitat for Humanity International to disclose alleged or confirmed safeguarding misconduct to external parties, such as donors, regulators or other governing bodies. Decisions related to "whether, what and to whom" to report externally under such circumstances will be guided by:
  - Jurisdictional or legal requirements within the country where the alleged incident occurred.
  - Any requirements defined in Habitat Bangladesh's and/or Habitat for Humanity International contractual commitments to external parties (e.g., reporting requirements based on a grant agreement, etc.).
  - Any requirements for mandatory reporting of *serious incidents* that are established by charity watchdogs or other governing bodies in the relevant jurisdiction, such as required by the UK Charities Commission and other comparable organizations.

As appropriate to raise awareness and demonstrate public accountability, Habitat for Humanity International (and/or a designated Habitat entity) may voluntarily share information related to allegations of safeguarding misconduct and/or investigations, as guided by the parallel philosophies of transparency (to donors, regulators) and confidentiality (protection of affected parties).

Habitat Bangladesh and/or Habitat for Humanity International may choose to report certain issues to donors or governing bodies where no clear contractual or legal requirement exists but where we determine the disclosure to be in the best interest of the public trust.

Habitat Bangladesh and Habitat for Humanity International will provide the Habitat for Humanity International board of directors and Habitat Bangladesh's SLT with routine updates on safeguarding allegations and investigations to facilitate proper oversight.

[13] These reporting protocols do not replace, but instead supplement, the local reporting community-based feedback mechanisms (such as a dedicated local complaint email address, a local hotline, a community suggestion or complaint box, etc.) that each Habitat for Humanity organization must also have implemented to receive such concerns directly from children, adults, community members and other external stakeholders. All safeguarding complaints raised through community-based feedback mechanisms must be added to the Habitat Ethics and Accountability Line within 48 hours.

Response

Standard 12: Responding to reported concerns

Habitat for Humanity International handles all safeguarding investigations with due diligence and professional care and has established an independent investigations unit within the Governance, Risk Management and Compliance, or GRC, department. The GRC unit is composed of experienced investigators specifically trained in safeguarding investigations, including sexual exploitation, abuse and harassment. In addition, GRC's investigators may partner with third-party legal and investigative experts to assist in conducting safeguarding investigations. Further details of the expected processes when conducting appropriate safeguarding investigations can be found in the safeguarding procedures and the Investigations Handbook.[14]

- **Investigation procedures and legal mapping:** Our investigation procedures include best practices and established protocols to ensure due process and consistent management of safeguarding allegations. Upon receipt of an allegation, the report will be screened and triaged to ensure all necessary information has been reported so that Habitat for Humanity International can plan the best approach and mobilize a response, which may include coordination with Habitat Bangladesh. As part of our response, we will engage in a legal mapping exercise to comply with local or national laws while identifying any protective risks that may threaten further harm (e.g., if reporting to local authorities increases harm to the affected child or adult).
- **Trauma-informed practice:** We will engage trauma-informed practices by consulting with any child or adult harmed by alleged misconduct to ensure that their rights and wishes are prioritized and supported.
- **After- and survivor-care referrals:** Any child or adult affected by misconduct ("victim," "survivor" or "affected child/adult/person") has the right to receive imminent and extended care to assist in their recovery from harm. Our Safeguarding Survivor Support Services Framework aims to guide all organizations operating under the Habitat for Humanity International network (including Habitat Bangladesh to comply with the expectations to provide appropriate assistance to any child or adult affected by a safeguarding breach. Habitat Bangladesh, with the support of Habitat for Humanity International, will consult with the affected child or adult to conduct a Safety and Risk Assessment, which will inform the short-, mid- and long-term care needs and risks associated with the delivery of care and/or investigation activities. Habitat Bangladesh will maintain an aftercare directory that will record community-based services where referrals can be made.
- **Communications:** We are committed to communicating with the child or adult affected by the alleged misconduct throughout and upon conclusion of the investigation.
- **Investigations:** Habitat Bangladesh and/or Habitat for Humanity International will investigate all credible safeguarding concerns, collect evidence, conduct interviews with witnesses, and reach a conclusion based upon the weight of the evidence and applying the workplace standard of proof (e.g., more likely than not to have occurred).
- **Management response:** Final investigation reports will help to inform the necessary management response, action plans and/or application of lessons learned.

Retaliation

We will not tolerate retaliation against any representative who has engaged in a legally protected activity. Protected activities include good faith reporting of a safeguarding allegation, participation in a safeguarding investigation, and reasonably opposing conduct made unlawful by the local laws, legislation or regulations where the misconduct is alleged to have occurred.

Anyone who has engaged in retaliation will be subject to disciplinary action, up to and including termination, and in accordance with our disciplinary protocols.

Retaliation can take many forms. Adverse actions that *may* indicate retaliation has occurred include but are not limited to:

- Demotion, reassignment, or transfer.
- Termination.

[14] Available on MyHabitat's International Knowledge Center or by request to the GRC department.

- Salary or benefit reduction.
- Exclusion or being passed over for opportunities.
- Denial of time off, a promotion or a raise.
- An unwarranted negative performance review.
- Harassment.
- Threats.
- Any other form of physical, psychological, social, spiritual or financial harm.

Any representative who experiences or believes they have experienced retaliation should report it immediately.

Confidentiality

We observe the principle of confidentiality throughout our safeguarding case management processes. Wherever possible, private information will be shared with people who "need to know" and only after analyzing the requirements and use of the information. People who need to know may include specific people in Habitat Bangladesh and Habitat for Humanity International leadership, GRC/safeguarding investigators, or external parties such as attorneys, law enforcement, courts, regulatory authorities and/or donors.

We believe in managing information with confidentiality to:

- Prevent harm that can be caused when information is not shared in an ethical or responsible way.
- Safeguard against the misuse of information.
- Protect the reputation of people and Habitat Bangladesh.
- Encourage reporting by building trust.

For these reasons, we will protect the identities of all witnesses (e.g., complainants, reporters, respondents and general witnesses) wherever safety issues require and whenever possible in conformity with local laws. Any information that Habitat Bangladesh or Habitat for Humanity International is required to share will be reviewed with the legal and GRC teams before it is released to any external party or authorities. In the case that confidential information must be disclosed, any witness will be informed about how their information is being shared.

Informed consent and assent

We believe that fully informed consent and child assent are critical to promote the rights of children and adults and to dismantle oppressive and exploitative practices to which marginalized and disenfranchised communities have historically been subjected. As we engage children and adults, we are committed to ensuring that they understand the risks and benefits of their participation and the uses of their sensitive data or personally identifiable information, or PII.

We will never coerce, require, rush or manipulate any child or adult to consent or assent to any activity. Whenever the activity for which we are seeking consent and assent (e.g., photos for communications or fundraising) is *not required* to receive the service or benefit being offered, Habitat Bangladesh will not withhold or refuse services, programs or access to resources because of the child's or adult's refusal.

Children and adults may rescind informed consent or assent at any time. In any case where consent or assent of a photo, video or story has been revoked, Habitat Bangladesh will make reasonable efforts to ensure that all such materials are removed from circulation. The child and/or adult will be informed of any limitations involved in retracting materials (e.g., if images, films or stories are archived but searchable news articles, commercials or marketing materials have been released to the public) *at the time that informed consent and assent is given.*

Revision/review history

Effective Date	Explanation
[**August 1, 2025**]	This policy is initiated by HQ. Bangladesh has adopted HQ policy and got approval.
Approved by:	**Muhammad Mahfuzur Rahman, Interim National Director**

Appendix A: Definitions

Abuse of power: When a person uses their position of power, trust or influence to their own advantage, to place another person at a disadvantage, or to harm another person inadvertently or deliberately.

Adult: Any person over the age of 18 (in most countries).

Affected person: Sometimes referred to as the "complainant," "survivor" or "victim." The affected person is someone who has experienced the alleged misconduct or harm.

Assent (child): *Child assent* is the process by which a child is consulted about their participation and/or use of sensitive data or PII. Whenever consent is required for a child to participate in a project or for Habitat for Humanity to use their sensitive data or PII, child assent should be obtained contemporaneously to informed consent by their parent, legal guardian or responsible caretaker.

At-risk adult: A person over the age of 18 with a physical, mental or life status that causes particular vulnerability (such as a physical or mental disability), or any adult living in a fragile context that heightens the risk of an abuse of power because of limited access to basic resources, including food, housing, safety or water.

Best interests of the child: Deciding what type of services, actions and orders will best serve a child and who is best suited to take care of a child.

Bullying: A form of aggressive behavior that occurs in an intentional and repeated manner, causing another person to feel hurt. Bullying can take multiple forms, including spreading rumors, threatening, physical or verbal assault, engaging in insidious practices such as excluding a person from a group, or any other gestures or actions that occur in a less visible manner.

Casual visitor: Any short-term or one-time visitor. The casual visitor may be a nonrepresentative (e.g., donor, Habitat celebrity ambassador, guest) invited to visit a project site or participate in a Habitat-sponsored or Habitat-funded activity.

Child: Any person under the age of 18, regardless of the local legal age of majority or consent.

Child abuse: Any form of physical, emotional or sexual abuse; neglect; or exploitation resulting in actual or potential harm to the child's health, well-being, survival, development or dignity by an individual or an institution. It includes but is not limited to any act or failure to act that results in death or serious physical or emotional harm to a child, or an act or failure to act that presents an imminent risk of serious harm to a child.

Child labor: Exploitive work that deprives children of their childhood, their potential and their dignity and is harmful to their physical, social, psychological and/or mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and that may also interfere with their schooling.

Child rights: International standards memorialized within the U.N. Convention on the Rights of the Child that recognizes the unique vulnerabilities and protections for people under the age of 18. It also upholds the principles of treating all children, without distinction, with dignity and integrity.

Commercial sexual exploitation of children (CSEC): The sexual abuse or exploitation of a child in return for cash or any other goods or services. Examples of CSEC include child prostitution, child pornography or indecent images, and child sex tourism.

Complainant: Sometimes referred to as the "affected child or adult," "survivor" or "victim." The complainant is the person who has experienced the alleged misconduct or harm.

Confidentiality: Confidentiality refers to keeping a person's or Habitat's information private or protected.

Disaster response: Habitat's progressing after a disaster or crisis, focusing on both early and long-term recovery.

Discrimination: Unjust or unfair treatment of people based on certain prejudices or characteristics, including an individual's sex, sexual orientation, gender identity, race, ethnic background, national origin, age, religion, disability, military or veteran status, or other legally protected characteristic.

Emotional abuse: Any isolated or ongoing harm to a child's or adult's emotional, intellectual, mental or psychological well-being or development.

Exploitation: The actual or attempted abuse of a position of vulnerability, power differential or trust for the benefit of the individual leveraging their position, power, privilege or wealth, sometimes through enticement, manipulation, coercion or trickery, to engage a child or adult in labor, domestic servitude, forced criminality or other illegal acts to profit monetarily, socially or politically.

Fragile or emergency contexts: Geographic areas (e.g., communities, regions, countries) where there has been an emergency or destabilization due to a disturbance in social order or rule of law, or other disrupting event or where there is limited access to basic needs like clean water, food, shelter and safety.

Good faith reporting: The genuine belief that a risk or harm has arisen at the time it was reported.

Grooming: The process in which an adult or older child or youth builds a relationship with a child and/or the child's caretaker to gain the child's and caretaker's trust for the purposes of sexually abusing or exploiting the child. Grooming can happen online or in person and is a gradual process that can sometimes be difficult to detect. Grooming may include but is not limited to:

1. Showing preferential treatment or favor to a child.
2. Giving the child gifts, rewards or special privileges.
3. Removing the child from interactions with their peers or safe adults in their life.
4. Using knowledge of a child's vulnerability to build a close relationship.
5. Befriending the parents or caretakers who are responsible for protecting the child.
6. Allowing the child access to alcohol or drugs or encouraging illegal activity.
7. Building intimacy through "special" experiences shared only by the child and groomer.

Harm: Any form of abuse, discrimination, exploitation and harassment, or any injury resulting from unsafe programming.

Harassment: Any comment or behavior that is offensive, demeaning, humiliating, derogatory or otherwise inappropriate or that fails to respect the dignity of an individual. It can be committed by or against a beneficiary, partner, staff member, official or any other person involved in any way in a Habitat program or operation.

Human rights: International standards, as articulated by the U.N. Universal Declaration of Human Rights, that recognize and protect the dignity and integrity of every individual without distinction.

Informed consent: The process by which a competent adult is given information about the risks, benefits and use of their information or that of their child so that they can make an informed decision about their participation and/or use of sensitive data or PII.

Modern slavery (aka human trafficking or combating trafficking in persons, or TiP): Holding a person in slavery or servitude or requiring a person to perform forced or compulsory labor are to be construed in accordance with Article 4 of the Human Rights Convention, as further defined by the UK Modern Slavery Act of 2015, and the U.S. government clause for Combating Trafficking in Persons.

Neglect: The failure to meet a child's or adult's basic physical and/or psychological needs either deliberately or through negligence. This may include but is not limited to failure to prevent harm, inadequate supervision of children, failure to access urgent medical care for a child or adult, exposure to unsafe project environments (e.g., unsafe programming or access to harmful objects or building materials), and/or failure to properly child-proof project environments, as needed.

Partner: Any organization or individual receiving Habitat funding or supporting or implementing a project or program on behalf of Habitat.

Personally identifiable information (PII): Any information that can be used on its own or with other information (e.g., triangulation) to identify, contact or locate a single person or group of people (e.g., a Habitat homeowner).

Physical abuse or assault: The non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury to a child or adult.

Pornography: Any indecent images, videos or content involving the partial or full nudity of any child or adult.

Prostitution: The exchange of money, goods, resources or favors for any sexual act involving direct or indirect contact.

Protection (child or adult): In the humanitarian and development sector, protection is distinct from safeguarding. Protection concerns arise when a person *unaffiliated with Habitat* engages in harmful, abusive, discriminatory,

exploitative or harassing behaviors toward a child or adult. For example, a child protection issue can involve the abuse or neglect of a child by their parent, a relative or another community member. Another example may be an adult from the community who is experiencing domestic violence (e.g., intimate partner, dating or familial violence). This would be considered an *adult protection* concern. In other words, protection issues involve abuses of power or acts of violence, maltreatment or harm toward children and adults by people within their family or community. Protection may necessitate external reporting. Safeguarding advisers should be consulted to determine if external reporting (e.g., law enforcement, child protection, elder services, etc.) is safe and practical within a specific context. It is possible for a protection concern to also be a safeguarding concern (and vice versa), so please speak with a safeguarding adviser, officer or focal point to ensure proper reporting of any concern, suspicion or known incident.

PSEAH: The protection from sexual exploitation, abuse and harassment.

Reporter: Any person who reports a concern, suspicion or known incident, whether anonymously or in name.

Representatives: An individual acting on behalf of Habitat for Humanity, including but not limited to board members, staff members, contractors, interns, AmeriCorps members (including VISTA members), volunteers, implementing partners and suppliers (suppliers also include local volunteers and artisans).

Respondent: The person who is responding to an allegation of misconduct, or the person alleged to have engaged in misconduct.

Retaliation: Any negative or adverse action taken against any Habitat representative engaged in a protected activity (e.g., reporting an abuse of power or participating in an investigation).

Safeguarding: The organizational policies, procedures and practices identifying the behavioral expectations and prohibitions to ensure that interactions between Habitat representatives and children, adults, community members, partners and colleagues are safe, and healthy offering people opportunities to thrive while respecting their unique identities and lived experiences. Safeguarding policies, procedures and practices endeavor to ensure that abuses of power by Habitat representatives are first prevented. When an abuse of power occurs, safeguarding systems ensure that concerns, suspicions and known incidents are reported in a timely manner to allow for an organizational response that interrupts harm, assesses safety, delivers necessary care and services, and addresses misconduct through established protocols.

Sexual abuse: Any actual or threatened physical intrusion of a sexual nature (including inappropriate touching), whether by force or under unequal power dynamics or otherwise coercive conditions.

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual harassment: Any unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature (whether verbal, written or visual) that occurs between a Habitat staff member or representative and any person with whom they interact in their Habitat role. *For further details, see the Policy on Harassment, Bullying and Discrimination.*

Survivor: Sometimes referred to as the "affected person," "victim" or "complainant." The survivor is the person who has experienced the alleged misconduct or harm.

Victim: Sometimes referred to as the "affected person," "survivor" or "complainant." The victim is the person who has experienced the alleged misconduct or harm.

Youth: Any person between the ages of 15 and 24, as defined by the United Nations for statistical analyses. It is important to note that the term includes people who are defined in this policy as both children and adults. For this reason, any engagement with anyone under the age of 18 must abide by the Safeguarding Policy provisions.

Zero tolerance: The organizational commitment to hold accountable any Habitat representative who engages in harmful, unhealthy or unsafe behaviors with any child, adult, community member, partner and/or colleague.

Zero tolerance for inaction: The organizational commitment to take all credible reportable concerns seriously and ensure proper care and support are provided to any person who has been harmed, abused, discriminated against, exploited and/or harassed.

Appendix B: Related internal policies of Habitat Bangladesh and external resources

All of the policies and resources listed below can be found through the Child and Adult Safeguarding Policy and Procedures page of the MyHabitat Knowledge Center.

8. Policies Library for National Organizations, Branches and Habitat for Humanity International
9. Ethics Covenant and Code of Conduct
10. Core Documents
11. Safer Programming Guidance Note
12. HOME Policy
13. Anti-Trafficking in Persons Policy
14. Policy on Harassment, Bullying and Discrimination
15. Whistleblower Policy
16. Fraud Policy
17. Volunteer Code of Conduct
18. Safe Recruitment for Employment Toolkit
19. Background Screening Policy
20. Investigations Handbook
21. MEAL Handbook
22. Habitat for Humanity Accountability Framework
23. Enterprise Risk Management
24. Gift Acceptance Policy and Procedures
25. Minimum Standards for Work Teams Traveling Internationally
26. Data Management
    A. Global Record Retention Policy
    B. General Data Protection Regulation (GDPR)
27. Community-Based Feedback and Complaint Mechanisms Guidelines
28. HFH Survivor Support Framework

Appendix C: Individual Acknowledgment

1. Individual Policy Acknowledgment

This Safeguarding Policy describes Habitat Bangladesh's commitment to preventing and responding to harm caused by physical or sexual abuse or exploitation, harassment, or bullying of Habitat for Humanity representatives, people in the communities we serve (especially vulnerable adults and children), and people whom we partner with.

I acknowledge that I have read and reviewed the requirements contained in the policy and agree that I will follow them.

I further commit to report to **Habitat Ethics and Accountability Line reporting tool** (HEAL) any suspected safeguarding misconduct and to help to create and maintain an environment that prevents sexual exploitation and abuse; safeguards the rights of beneficiaries, research participants and community members (especially vulnerable adults and children); and promotes the implementation of Habitat for Humanity's Ethics Covenant and Code of Conduct. *(Note: Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.)*

I understand that I should consult with a Habitat Bangladesh safeguarding focal point, Habitat for Humanity International safeguarding officer or a member of the Governance, Risk Management and Compliance, or GRC; Global People Team, or GPT; or the Legal department regarding any questions I have about the application of this policy.

Signature

Date received

MUHAMMAD MAHFUZUR RAHMAN

Name (typed or printed)

Safeguarding Behavioral Commitments Acknowledgment

Habitat for Humanity representatives[15] will:

1. Treat all people with respect and dignity.

- ☐ In recognition of the fundamental rights of all people to live and work in environments free from all forms of harm, abuse, discrimination, bullying, exploitation and harassment, **I will** behave with the highest standards of ethics to uphold the safety, dignity and respect of every child, adult, community member, volunteer, partner and colleague with whom I have contact.
- ☐ **I will** engage others with cultural humility[16] and contribute to safe workplace, operational and project environments that celebrate the unique backgrounds, views and experiences of everyone with whom we work, practice fairness, prioritize people-centeredness.
- ☐ **I will** promote healthy communication void of shame, humiliation, belittling, degradation or any form of emotional abuse when engaging with children, adults, community members, volunteers, partners and colleagues.
- ☐ **I will** engage in conduct consistent with the Child and Adult Safeguarding Policy and policies outlined in the Safeguarding Framework.
- ☐ **I will** be a positive role model for children.
- ☐ **I will** take responsibility for ensuring that I am accountable and do not place myself in positions where there is a risk of allegations involving children being made.
- ☐ **I will** self-assess my behaviours, actions, language and relationships with children.
- ☐ **I will** comply with all relevant national child protection laws and regulations, including labour laws and regulations in relation to child labour.
- ☐ **I will** consult with the Child Protection Advisor / Safeguarding Focal Point or other relevant staff if I have any questions regarding child protection and how it relates to my work/relationship with Habitat Bangladesh.
- ☐ I will immediately disclose any and all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before, or during my work/relationship with Habitat Bangladesh.
- ☒ **I will not** abuse or misuse any power, influence, privilege, authority or trust I may hold.
- ☒ **I will not** engage in sexual activity with anyone under the age of 18, regardless of local laws or the age of consent. Furthermore, I will not engage in any relationship — sexual or otherwise — that may be exploitative or harmful.
- ☒ **I will not** meet alone with or show preferential treatment to any child. (A minimum of two adults will always be present when interacting with a child.)
- ☒ **I will not** engage in any behavior, including touching a child or adult, that is or can be interpreted as inappropriate, grooming, harmful or abusive.
- ☒ **I will not** solicit sex[17] or exchange money, employment, goods, special considerations, or services for sex, including sexual favors.
- ☒ **I will not** engage in any form of harassment, including comments, jokes, gestures, emails, suggestive looks, that are or could be interpreted as inappropriate, or other behaviors that may create discomfort; be unwelcomed; or otherwise result in a hostile, intimidating or difficult work or project environment.
- ☒ **I will not** exploit the labor of any person for professional or personal benefit or gain and ensure "sweat-equity" projects are clearly explained.
- ☒ **I will not** discriminate against any child, adult, volunteer, partner or colleague.

[15] Including but not limited to board members, staff members, contractors, interns, AmeriCorps members (including VISTA members), volunteers, implementing partners and suppliers.

[16] Cultural humility is a process of self-reflection to understand the culture of another person, the influences that have shaped another person, and the willingness to be open to learning about the cultural identity of another without judgment or bias.

[17] This applies even in jurisdictions where sex work is legal.

☒ **I will not** provide anything of value (e.g., money, goods, services, etc.) to project participants unless it is part of the project and there is clear communication about its purpose.

☒ **I will not** do things of a personal nature that a child can do for him/herself, such as assisting with toileting or changing of clothes.

☒ **I will not** invite unaccompanied children into my home/hotel or other private location, unless they are at immediate risk of injury or physical danger.

☒ **I will not** sleep in the same room or bed as a child.

☒ **I will not** give or provide children with alcohol or illegal drugs;

☒ **I will not** hold, kiss, cuddle or touch a child unnecessarily, especially so in an inappropriate, or culturally insensitive way.

☒ **I will not** seek to make contact and spend time with any child/children outside the program times.

☒ **I will not** use any computers, mobile phones, video and digital cameras, or social media in an inappropriate or culturally insensitive manner, nor use them for the purpose of exploiting or harassing children.

2. Protect sensitive data and personally identifiable information, or PII.

☐ **I will** exercise care, practice confidentiality, and follow the Data Protection and Retention Policy when working with or managing sensitive data or PII.

☐ **I will** obtain informed consent and assent by ensuring that any project participant — child or adult — is informed of risk, benefits and/or requirements in simple language that is easily understood prior to the provision of any service, benefit or use of data.

☐ **I will** follow the Communications and Fundraising Guidelines and only use photos, videos or stories depicting children, adults or community members (including families who partner with Habitat) for business purposes.

☐ **I will** only use official business channels to communicate with project participants and Habitat representatives and will make those communications available upon request.

☒ **I will not** exchange personal contact information or personal social media accounts with project participants (including families who partner with Habitat), child or adult volunteers, or members of the community where we operate.

☒ **I will not** make publicly available PII and have been strongly discouraged from sharing photos, videos or stories, especially of children or adults from communities where we operate, through my personal social media accounts.

☒ **I will not** use my personal social media accounts, personal mobile phone, or personal email accounts to connect, "friend" or communicate with children or adults from communities where we operate.

3. Report concerns, rumors, suspicions or known safeguarding violations.

☐ **I will** report any safeguarding disclosures[18], concerns, rumors, suspicions or known incidents within 24 hours or at the earliest time a reporting mechanism is available.

☐ **I will** intervene, if safe and possible, to interrupt harmful behaviors.

☐ **I will** share all known information to ensure a timely response and provide additional information or evidence as requested.

☐ **I recognize** that "good faith" reporting is a protected activity and will share concerns even if I don't have all the information.

☒ **I will not** delay in reporting, withhold information, or ignore requests for evidence.

☒ **I will not** deter reporting by a program participant, volunteer, partner or colleague.

☒ **I will not** retaliate against, treat poorly or engage in harassment toward anyone who has or is believed to have reported a safeguarding incident.

☒ **I will not** engage in malicious or "bad faith" reporting.

[18] Disclosures include reports from program participants or others who are unfamiliar with, may not have access to, or are not comfortable with directly reporting an allegation to HEAL or other established Habitat reporting mechanism.

☒ **I will not** investigate a safeguarding matter myself or question individuals who may be involved in the matter.

4. Respond to disclosures with care and cooperate with internal processes.

☐ **I will** immediately inform my direct supervisor, a member of GRC, a safeguarding regional adviser or safeguarding focal point of any imminent harm to a project participant, volunteer, partner or colleague so that the proper support and care can be delivered.

☐ **I will** cooperate with any internal or external investigation.

☐ **I will** maintain confidentiality and abstain from sharing information related to a reported concern or investigation to which I may be privy.

☒ **I will not** ignore any signs of imminent harm, abuse or danger to a project participant, volunteer, partner or colleague.

☒ **I will not** coach or otherwise coordinate stories with investigation witnesses.

☒ **I will not** retaliate, treat poorly, or engage in harassment towards anyone who is or is suspected to be involved in a safeguarding investigation – whether a complainant, witness, or respondent.

☒ **I will not** withhold any information during an investigation.

I acknowledge that I have read and reviewed the safeguarding behavioral commitments and agree that I will follow them.

_____ _____

Signature Date received

_____

Name (typed or printed)