	Policy Family **Safeguarding Policy**
	Policy Name **Prevention of Sexual Exploitation, Abuse and Harassment Policy**
Issuing By Habitat for Humanity Bangladesh	Approved By  James Samuel, National Director, HFHB
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Scope

This policy applies to all Habitat for Humanity International -Bangladesh (HFHI-B) staffs, volunteers, interns, consultants, facilitators, visitors, partner organizations and contractors in its all offices, including National office and Field/Project Offices.

Interpretation

In the implementation of this Policy or any interpretation thereof the decision of the National Directorshall be final.

Amendments

The National Director of HFHI-B reserves the right to change, modify, amend, cancel, and alter any of the provision of this Policy from time to time at its absolute discretion and such changes, modifications, amendments, cancellations, and alterations if and when made, shall be binding on all to whom this Policy applies. The policy will be reviewed in every two to five years and necessary changes/revisions will be made.

I. INTRODUCTION

Sexual Exploitation, Abuse, and Harassment (SEAH) are violations of basic human rights. Habitat for Humanity Bangladesh (HFHB) aims to provide a safe and trusted environment that safeguards everyone from SEAH including beneficiary communities, staff, volunteers, consultants and partner organizations. HFHB is committed to safeguarding the people it helps and with whom it works.

The nature of HFHB development workplaces staff in positions of authority and trust in relation to the communities we serve, especially vulnerable adults and children and a wide range of volunteers. It is therefore essential that appropriate SEAH risk management practices are embedded into the organization that are consistently applied and reinforced, as outlined in this Policy.

Definition of Terms

Stakeholder: Includes Staff (full-time, part-time, casual), consultants, contractors, interns, volunteers, agents and partners including persons in Habitat for Humanity National Offices (NOs), Habitat for Humanity International Branches and State based Affiliates
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 abuse: Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal power dynamics or otherwise coercive conditions.
Sexual harassment: A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favors, or engages in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

II. PURPOSE

This policy sets out HFHB's approach to preventing sexual exploitation abuse and harassment associated with the work that it does. It sets out:

- Principles upon which HFHB will base SEAH decision-making and actions
- Expectations of conduct of all who represent HFHB, including recruitment, screening and employment processes
- Specific prohibited practices for those who represent HFHB
- How HFHB will assess SEAH risk and ensure appropriate conduct at all times
- HFHB commitments to regular training for Stakeholders
- HFHB commitments to reporting and investigation procedures that ensure SEAH issues are identified and effective action is taken

III. POLICY STATEMENT

HFHB takes a zero-tolerance approach to all forms of SEAH and maintains an organizational culture that prioritizes safeguarding against SEAH. HFHB will make it readily accessible for any person affected

to come forward and report incidents and concerns with the assurance they will be handled confidentially, sensitively and appropriately.

HFHB Stakeholders have an obligation to uphold high standards of personal and professional conduct at all times and must not breach positions of trust in order to impact another person through sexual exploitation, abuse and harassment, sexual violence, bullying, fraternization, or any other abuse of power.

HFHB prohibits transactional sex for all Stakeholders while engaged in HFHB activities.

This Policy addresses the sexual exploitation, abuse and harassment of adults. It does not replace HFHB's Child Protection Policy.

HFHB Stakeholders must also comply with the complementary provisions of the HFHB Safeguarding Policy, HFHB Child Protection Policy, Safeguarding and Child Protection Policy and Code of Conduct, Policy on Harassment, Bullying and Discrimination, Whistleblower Policy, HFHB Child Labour Policy, HFHB Use of Photos and Stories Policy, Community-Based Feedback and Complaints Mechanism (CBFM) Policy.

IV. POLICY IN PRACTICE

1. Prevention of Sexual Exploitation, Abuse, and Harassment

Sexual exploitation, abuse and harassment (SEAH) occur when people in power exploit or abuse vulnerable people for sexual purposes. HFHB Stakeholders must conduct themselves professionally and appropriately at all times and never engage in conduct which could involve or be perceived as involving any form of sexual exploitation, abuse or harassment.

2. Application of Policy

This Policy applies to all Stakeholders involved in HFHB activities.

3. Assessing Risk

HFHB maintains an organisational risk register (and separate International Programs risk register and Bangladesh Program risk register) which identify potential SEAH risks to any Stakeholder or beneficiary.

PSEAH and Child Protection clauses clearly identify safeguarding risks, management and reporting in all Partnership Agreements and Activity Agreements entered into by HFHB, with direct steps in communications with partners taken before execution to ensure all signatories and their staff are aware of their mutual obligations to manage safeguarding risks.

Project level SEAH risks are captured in risk management planning and monitoring processes of projects undertaken during project development and implementation by HFHB in collaboration with HFH implementing partner organisations. Risk mitigation and monitoring strategies are included as part of these ongoing risk management processes.

Risk registers will be reviewed regularly as project initiatives change and updates to policies and procedures will be made at least every two years.

4. Recruitment, Engagement and Management of Stakeholders

HFHB will ensure the protection, safety, security and well-being of Stakeholders and all people with whom HFHB works and supports.

Policies and procedures regarding the recruitment, engagement and management of HFHB Stakeholders are contained in the HFHB Employee Handbook and in other relevant stand-alone HFHB policies.

Aligned with the HFHB Child Protection Policy and procedures, HFHB recruitment and engagement processes require background screening including criminal history record checks and reference checks, in line with the Habitat for Humanity International (HFHI) Safer Recruitment Toolkit. The HFHB Employee Handbook contains the following policies, which are relevant to the safety, security and well-being of Stakeholders and beneficiaries:

- Anti-harassment and Non-discrimination Policy
- Cyberbullying Policy
- Child Protection Policy and Procedures (and refer to stand-alone Policy and Code of Conduct)
- Sexual Harassment Policy
- Workplace Bullying Policy
- Victimisation Policy
- Complaints Policy
- Whistleblowing Policy
- Equal Opportunity Policy
- Gender Policy
- Staff Grievance/Dispute Resolution Process

All Staff (full-time, part-time, casual), interns, and volunteers are oriented on these policies and are required to sign their commitment to upholding all the policies in the Employee Handbook as well as the Code of Conduct as part of the induction process.

HFHB Staff (full-time, part-time, casual), interns, and volunteers will be trained annually on the requirements regarding the prevention and reporting of sexual misconduct, harassment and child protection. Implementing partner organisations are also required by HFHB to conduct annual safeguarding training for staff and project teams.

HFHB will ensure there is a responsible person appointed for managing PSEAH matters including policy reviews, staff training, and complaint handling and reporting.

HFHB's Global Village and Local Village volunteers receive HFHB manuals and verbal briefings outlining the safety, security and expected behaviors while on a Volunteering Program. These include a Team Leader Manual, Pre-departure Briefing, Incident and Emergency Management Process, Team Member Guide and Team Member Manual. Complaint mechanisms will be explained to both volunteers and

community members to ensure they know how to report alleged abuse and action can be taken quickly.

5. Partner Obligations

HFHB protects Stakeholders and beneficiaries from discrimination, violence, abuse, exploitation or neglect based on an analysis of the context in which they are working or are located. HFHB contracted partners and affiliates must comply with this Policy. Staff, volunteers and contractors/subcontractors or partners and affiliates must also be familiar with and comply with the contents of this Policy.

Safeguarding risk management requirements are captured in HFHB Partnership Agreements and Activity level Agreements with implementing partner organisations in international programs. HFHB applies the HFHB Child Protection and Prevention of Sexual Exploitation, Abuse & Harassment - Safeguarding Assessment Checklist to assist partners to meet compliance requirements on an annual basis, as a minimum. These checks are conducted in conjunction with the HFHI safeguarding self-assessment process commenced in 2021 to identify capacity strengthening needs and appropriate actions to address them. These mechanisms support HFHB in addressing and exceeding minimum PSEAH standards of local safeguarding policies, safe local recruitment and training practices for stakeholders and downstream partners, community based SEAH reporting mechanisms, safe use of stories and photos and the existence of a safeguarding focal point in partner organisations.

6. Reporting Protocols for Potential Abuse

HFHB requires and enables Stakeholders and beneficiaries to make SEAH complaints to the organisation in a safe, transparent and confidential manner. Any person may report or make a complaint in relation to alleged Sexual Exploitation, Abuse and/or Harassment that they have experienced, observed or been made aware of in their role working with HFHB wherever it may occur. HFHB requires that community feedback mechanisms are in place where HFHB programs are delivered that capture and facilitate reporting requirements from individuals in those communities.

Any person who receives a complaint must immediately inform their direct supervisor confidentially. If the person has reason to believe that their direct supervisor may be involved in the alleged misconduct, the person must immediately notify their ND, and use the **Habitat Ethics and Accountability Line**, which is Habitat for Humanity's confidential, anonymous reporting hotline and central tracking repository for allegations of misconduct. Country partners are legally required to notify HFHB of any SEAH complaints immediately and safeguarding is included also as a standing agenda item in regular project team meetings to provide a safe forum to raise concerns.

The process for submitting a complaint is described in the HFHB Complaints Policy, which outlines the processes for Stakeholders, beneficiaries and the public. The Complaints Policy, this Policy and links to the Habitat Ethics and Accountability Line are located on the HFHB website.

HFHB must immediately (within two working days of becoming aware of an alleged incident) report to DFAT any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT funded activities. HFHB must (within five working days of becoming aware of an alleged incident) report to DFAT any alleged Policy non-compliance related to the delivery of DFAT funded activities.

All reports of alleged SEAH incidents should be made using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form (www.dfat.gov.au/pseah) and emailed to seah.reports@dfat.gov.au.

All alleged SEAH incidents that involve a criminal aspect will be reported to local law enforcement agencies, if safe and in accordance to the wishes of the victim, or in the case of a child survivor, it is deemed in the best interest of the child.

7. Procedure For Investigating Alleged Misconduct

Due to the potential seriousness and sensitivity of a complaint, the individual who receives a complaint should not start any investigations, but rather report the concern to the relevant direct supervisor and or to the **Habitat Ethics and Accountability Line** reporting tool. Confidentiality and sensitivity for the wishes of the survivor must be maintained at all times. HFHB investigation process is described in the HFHB Complaints Policy. As there may be circumstances where the performance of an investigation would increase the harm to the survivor, any actions will be taken only after full consideration of the safety and the informed consent of the survivor.

HFHB will act on every allegation in a fair and reasonable way with due regard for procedural fairness, confidentiality and welfare of the survivor. The basis for all decisions related to investigation performance or non-performance will be documented. Habitat for Humanity International will also be informed and support in any investigation of SEAH misconduct in Bangladesh or with HFHB international programs.

HFHB recognises sexual exploitation and abuse as gross misconduct and perpetrators will face disciplinary action, including immediate termination of employment or engagement and referral for criminal prosecution in Bangladesh and/or the relevant country, where appropriate.

8. Obligations To Survivors

Support for potential victims of misconduct (or survivors) will be provided regardless of the status or outcome of an investigation. Upon receipt of an allegation of safeguarding misconduct, HFHB will, in partnership with HFHI and in accordance with HFHI Safeguarding Policy, consider providing various forms of survivor assistance, as appropriate depending on the nature of the allegations, the circumstances involved, and the informed consent of the survivor. This includes immediate material care, facilitating health and psychosocial support and legal/advocacy support.