



BRAC Safeguarding Policy

BRAC Europe

Version 2.1

January 2025

Version history

1.0 – May 2020

2.0 – June 2022

2.1 – January 2025

Purpose

The purpose of this policy is to describe how BRAC's Safeguarding Policy applies to BRAC Europe.

BRAC has committed to safeguarding its people and the communities it serves against abuse¹ across all its offices, programmes and enterprises. This commitment to safeguarding is articulated through BRAC's values, codes of conduct and staff handbooks and incorporated into the design of programmes and enterprises.

BRAC recognises that some of its people are more at risk and has articulated categories of staff and programme participants for whom risks may be greater: children, adolescents, people with disabilities and women. For staff, there may also be situations where risk is increased, i.e., during international travel.

BRAC Europe also needs to ensure that it is meeting employment legislation and regulatory requirements which pertain to safeguarding as well as legislative requirements for safeguarding children and adults at risk.

BRAC Europe has developed separate Child and Adults at Risk Safeguarding guidance (Annex. 4) to provide more details on how to safeguard these particular groups. Further details on how BRAC Europe safeguards staff are outlined in BRAC Europe's staff handbook.

Safeguarding Principles

BRAC holds the following principles with regard to safeguarding:

- Organisations have a safeguarding duty of care to participants, staff and volunteers, including where down-stream partners are part of delivery. This duty of care extends to all people, and in particular, children and adults at risk of abuse within the communities the organisations serve.
- Organisations have a duty to identify groups of people among employees and participants that are at greater risk of becoming victims of abuse. They have a duty to try to mitigate the extra risks those groups face.
- Organisations have a duty to try to prevent abuse occurring. They must make safeguarding a central element of the organisational culture. They must mitigate existing risks that may already exist in the programme design and specific work practices. They must establish secondary safeguarding mechanisms wherever risks cannot be mitigated through design.
- Organisations have a duty to make sure that, if abuse does occur, survivors/victims and witnesses have access to multiple safe reporting channels. Organisations have a duty to

¹ Sexual harassment, bullying, discrimination, intimidation, victimization, violence, neglect and exploitation.

always follow up on reports of abuse, to investigate them and to make sure that, if warranted, appropriate disciplinary action is taken. Organisations have a duty to protect whistleblowers.

- Organisations have, in principle, a duty whenever abuse crosses the line into criminal behaviour to involve local authorities.
- Organisations have a duty to anchor safeguarding within management. Responsibilities with regard to safeguarding should extend to the highest levels of management and to the Boards. Those responsibilities should be clearly assigned. Organisations have a duty to make sure that the execution of safeguarding policies is carried out by competent professionals according to the highest standards and, whenever possible, following global best practices.
- Everybody within an organisation is responsible for safeguarding employees, participants and community members. Everybody should intervene to stop abuse whenever possible. Everybody should report abuse.

Standards of Behaviour

BRAC standards of behaviour are described within BRAC's Code of Conduct at Annex 1 which accompanies this policy. These standards of behaviour are the minimum requirements for:

- All staff contracted by BRAC Europe
- Associated personnel whilst engaged with work or visits related to BRAC Europe, including but not limited to the following: donors; consultants; trustees; volunteers; contractors; programme visitors including journalists, celebrities and politicians

Prevention

Safe Design of programmes and enterprises

BRAC is committed to incorporating safeguarding into the design of programmes and enterprises and their work processes. BRAC Europe will ensure the following:

- Where BRAC Europe is supporting on the design of programmes, we will ensure that we adopt appropriate risk assessment and mitigation processes, support BRAC staff who are responsible for designing and delivering the programme to apply safeguards throughout the programme delivery including monitoring and evaluation;
- Where BRAC Europe is securing funding for programmes, we will ensure we have undertaken relevant due diligence on the programme proposal for safeguarding and secured funding which enables the programme to be delivered as safely as possible.

Recruitment and Selection

BRAC Europe has incorporated safeguards into BRAC Europe's recruitment process, from designing the job description to formal engagement of the employee. In summary, the following is considered when planning recruitment:

- Job descriptions for all positions – make reference to responsibilities for safeguarding and/or the Code of Conduct and include the beliefs and values of the organisation or link to them.
- Advertisement – makes clear the organisation's commitment to safeguarding.
- Shortlisting – obtains and scrutinises information in applications/CVs - resolve any gaps, discrepancies or anomalies in employment history.

- Interviews – includes questions around safeguarding, the Code of Conduct and working with children and adults.
- Self-disclosure – the shortlisted candidates sign a self-disclosure form stating that they have not been involved in any crime, illegal act, sexual harassment or child abuse case previously.
- Background/reference checks – verifies the successful applicant's identity, their employment history, and qualifications. Offers are not confirmed until all checks have been completed.
- External checks – criminal records checks conducted on all staff.

Education/training

BRAC Europe includes safeguarding in the education and training of its staff.

- Every new hire receives a brief introduction to the vision, mission and values of BRAC, the Code of Conduct and the Safeguarding policy and duly acknowledge all of these as part of their induction.
- Aspects of safeguarding that are relevant to specific work processes are always part of the professional training of all staff and that, where needed, this training is regularly repeated.
- Professionals who handle cases and complaints have competencies in line with the highest standards and the best practices.
- Campaigns to create awareness about safeguarding, where relevant, are undertaken at appropriate intervals or through different methodologies.

Communications

BRAC Europe prohibits any use of its computer systems and networks in violation of any applicable law or BRAC Europe policy, including those covering safeguarding, equal opportunities, racial and sexual harassment, discrimination, confidentiality, copyright and proprietary rights, publications, bullying, data protection and privacy; and/or any use that may potentially cause any damage, PR risk, legal or other liabilities to BRAC Europe or its people.

Risk Analysis

BRAC Europe will conduct risk analyses (using risk analysis tools and resources) on systems and processes, programmes and activities to ensure that actual or potential risks for staff, children and communities are understood and mitigated. Key or significant safeguarding and duty of care risks will be included in a risk register for senior management and the Board of Trustees so that these can be monitored and addressed as necessary.

Line management and prevention

Line managers have direct responsibility for preventing abuse, in the workplace and in the delivery of the mission and organisational goals of BRAC. They are responsible for creating an atmosphere of openness and accountability within their teams that makes it possible for witnesses and survivors/victims to come forward. Team/department/unit heads are responsible to ensure that risk analyses are conducted. They are responsible for ensuring that employees are familiar with the ethos of BRAC and with the general and relevant specific safeguarding policies.

Safe Partnering

BRAC ensures that appropriate safeguards are applied to partner organisations (suppliers, vendors, downstream partners, consultants, etc.):

- Wherever BRAC is working with, funding, or supporting other partner organisations, the provisions of both BRAC International and or BRAC (as relevant) and BRAC Europe policies are reflected in the partnership arrangements.
- Partners are required to have their own safeguarding policy that broadly follows the provisions of this policy, or adopt the BRAC policy.
- BRAC Europe or relevant BRAC office should be satisfied that the practice and management arrangements of its partners reflect this common commitment to safeguarding.
- Cases of abuse within a partner organisation receiving funding from BRAC Europe will need to be reported to the relevant BRAC office and to BRAC Europe. The local BRAC office, with BRAC Europe support, will ensure the case is followed up in an adequate manner.
- Reporting requirements will be reflected in reporting protocols within the partnership arrangements and in the BRAC International Standard Operating Procedures outlined in Annex 3.
- Breaches of safeguarding requirements may result in the termination of the partnership arrangement.

Visits to BRAC offices

This policy will still apply in the event that BRAC Europe staff or associates visit another BRAC office or programme.

Staff will also be expected to follow any additional restrictions on conduct specific to that location, for example, cultural or safety requirements. Staff are expected to make themselves aware of guidelines and expectations relating to conduct when visiting a BRAC programme country.

BRAC Europe staff and designated volunteers, for example, Board members or other stakeholders, who breach the policy and/or code of conduct whilst visiting another BRAC office will be subject to actions that need to be taken through this policy as well as any safeguarding actions at the local BRAC office e.g. perpetrating an abuse that is a criminal offence in a given country will need to be reported at local level as well as in the UK.²

Reporting and Response

BRAC has created a reporting system for abuse (and other violations) with several channels that complement each other.

BRAC Europe staff are obliged to report suspected or actual abuse by BRAC Europe colleagues that they have witnessed or been reported to them to line managers or the Safeguarding Focal Point, the Executive Director. Victims/survivors of abuse by BRAC Europe colleagues are not obliged to report but are encouraged to do so, so that BRAC

² This pertains to abuse as defined in this policy. There may be activities which are criminalised in particular countries but which BRAC would not define as abuse. BRAC Europe staff are advised to discuss any potential issues that might arise during visits to countries where activities are criminalised with the Safeguarding Focal Point prior to the visit. The Safeguarding Focal Point can discuss with the staff how best to protect themselves during that visit.

Europe can safeguard them and ensure the abuse is not repeated. Line managers receiving reports of suspected or actual abuse are required to report this to the Safeguarding Focal Point.

BRAC Europe staff travelling overseas and observing or receiving disclosures of suspected or actual abuse concerning BRAC or BRAC International staff, programme participants or associates (volunteers, consultants etc) should report that in the first instance to the national Safeguarding Focal Point and report it to the Europe Safeguarding Focal Point so that an appropriate follow up can be made. BRAC Europe's Focal Point will also provide details of the report to BRAC International safeguarding team.

If a complaint or concern does not relate to BRAC staff or associated personnel but to a third party, BRAC Europe will raise it with BRAC International or the relevant BRAC country office to take forward as they see fit, for example by making a police report. We will not take follow up actions since we have no contractual or employment relationship with third parties and have no jurisdiction to take action against them.

Information on all reports will be made to the Board Safeguarding Lead and to BRAC International or BRAC Bangladesh (as appropriate). The Board and BRAC International will receive regular updates on progress in investigating such reports. The Europe reporting flow chart can be found in Annex 2; the BRAC International Standard Operating Procedure for External Reporting of Misconduct can be found in Annex 3.

Safeguarding incidents will be reported promptly to the Charity Commission (if deemed by Trustees to constitute a Serious Incident) and to donors as required under grant agreements.

BRAC commits to ensuring that people that report abuse and other violations do not suffer any negative repercussions. BRAC protects complainants and whistleblowers. In cases where reports are not upheld but were made in good faith, no further action is taken with those involved in the report, or those making it. In cases where the report is clearly made maliciously, the person making that report will be subject to disciplinary action.

Response

BRAC Europe will follow up safeguarding reports and concerns.

- Any urgent attention required should be provided to parties involved in an incident (e.g. where a child or adult has been harmed) such as medical attention or immediate protection from further harm
- The Safeguarding Focal Point will assess the report and decide on the nature of the safeguarding concern, its seriousness, the need to inform/involve others (including informing donors), next steps, etc.
- A senior manager (normally the Executive Director) will take responsibility and have oversight of the case. A small team will be formed comprising staff that are most relevant to have involved based on the nature of the case and decisions taken on the immediate steps required to address the concern.
- A preliminary enquiry may be required to gather more information relating to the concern or allegations. Based on the outcomes of this process, the matter may require no further action, may require further investigation, or may be referred externally as it appears to be a criminal case, and so on.

- Subsequently however, if it appears there is a clear case for follow up and this is possible, a confidential and in-depth investigation will be carried out.

BRAC is committed to adopting a survivor-centred approach. BRAC Europe will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be informed by the survivor. BRAC Europe will also learn from the survivor what changes might be needed to either prevent something similar taking place in future, or to strengthen response and support provided.

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

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times.

Learning

BRAC commits to learning on safeguarding. The learning will be informed by experiences in implementing safeguards in organisational systems and processes, and through individual cases that may arise. Senior management and the Board will regularly discuss issues that are arising, the learning around these issues and changes that might be required in the organisation.

Governance

The Boards of BRAC, BRAC International and BRAC Europe have oversight and specific responsibilities for safeguarding measures, issues and concerns that arise from BRAC Europe staff, programmes or operations. Issues relating to safeguarding and integrity are discussed regularly at Board meetings.

The BRAC Europe Board of Trustees will have safeguarding as a standing agenda item at all meetings and a Safeguarding Lead Trustee. The Board will ensure that all members understand their duties and responsibilities for safeguarding and are able to carry them out. The Board will review and monitor the risk register which includes key safeguarding risks.

Guidance for Safeguarding Children and Adults at Risk can be found in Annex 4. Review of Safeguarding Policy

This policy will be reviewed annually and/or when there are any changes made to BRAC or BRAC International Safeguarding Policy upon which this is based and to ensure that the policy adjusts to learning within BRAC and reflects developing best practice in Safeguarding across the sector.