



**Sexual Harassment Elimination
Policy and Procedure
BRAC International**

Table of Contents

1. Connection to BRAC’s Overall Safeguarding Policy	3
2. Introduction	4
3. Scope of the Policy	4
4. Definitions:	4
Zero tolerance	4
Sexual harassment	4
Negative impact of sexual harassment on staff and BRAC	5
Positive impact of a harassment free environment in BRAC	5
Why Victim/survivor tend to conceal sexual harassment	6
Conducts Considered as Sexual Harassment	6
5. Policy Statement	7
Prevention	7
Reporting	8
Response	9
Learning	11
6. Responsibilities Framework	11
7. Confidentiality	13
8. Review of Policy and Procedure	13

1. Introduction to Sexual Harassment Elimination Policy of BRAC

Sexual harassment is a detestable and punishable offence in every sense. Whether it occurs in the workplace or elsewhere, it violates human rights. Failure to prevent such incidents consequently destroys the work environment and hinders an employee's right to a safe work space. Thus, BRAC is committed to ensure a safe workplace for its employees, programme participants and partners where no one is affected by anyone's actions related to sexual exploitation and abuse. All BRAC employees and associate personnel are expected to uphold the highest standards of personal and professional conduct at all times, and to provide humanitarian assistance and services in a manner that respects and fosters the rights of beneficiaries and other 'at risk' members of local communities.

SEA violates universally recognized international legal norms and standards and are unacceptable behaviours and prohibited conduct for all humanitarian workers including BRAC employees and associate personnel.

BRAC demonstrates zero tolerance against sexual harassments and all actions are made to recognise the pain and struggle of the victim. BRAC ensures that all incidents regarding sexual harassments are heard and reported and the perpetrators are punished through a fair disciplinary process followed by due investigation without any delay beyond procedure. BRAC treats each of the cases as unique and extracts the learning from it for continuous improvement of the process.

2. Connection to BRAC's Overall Safeguarding Policy and UN's Protection from Sexual Exploitation and Abuse Policy

BRAC has over forty years safeguarded its people (program participants, employees, volunteers and partners) in the by making their safety a primary consideration at the level of the design of programs and enterprises. The prevention of sexual harassment, exploitation and abuse is as far as possible build into the work practices themselves. If the design and its implementation cannot reduce risks sufficiently BRAC has installed secondary safeguarding mechanisms, like selecting and training of personnel, supervising and monitoring activities, reporting channels, investigations and disciplinary actions.

In the overall safeguarding policy BRAC has described its history in more than forty years of safeguarding practice. BRAC pledges to continue its vigilance. The safeguarding policy also described BRAC's ethos and prevention practice in general.

This Sexual Harassment and Elimination Policy is a description of how BRAC deals with situations where (despite all its efforts) incidents of sexual harassment, abuse and exploitation still do take place and must be addressed in a systematic manner. It is well connected with the UN's policy on Protection from Sexual Exploitation and Abuse in the following manner:

- a) BRAC commits to make every effort to create and maintain a safe environment, free from SEA, and take appropriate measures for this purpose in the communities where it operates, including prevention and response measures.
- b) The SHE policy framework affirms BRAC's commitment to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to SEA as stated below:

1. SEA by BRAC employees or related personnel constitute acts of gross misconduct and therefore grounds for termination or dismissal of employment.
2. Sexual activity with children and adolescents (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between BRAC employees or related personnel and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a BRAC employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.
6. All BRAC employees and related personnel are obliged to create and maintain an environment which prevents and eliminates SEA and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

3. Scope of the Policy

The Sexual Harassment Elimination policy sets out BRAC's approach to prevent and respond to sexual exploitation, abuse and harassment.

Anyone can be a victim/survivor of sexual harassment, exploitation and abuse, regardless of their sex and age. The sexual harassment elimination policy applies to all those who work directly or indirectly with BRAC. This includes any employee of BRAC, (regular, service, contractual, part-time) both on-and-off duty, and associated personnel (intern, consultant, employee of partner organization, board members, programme participants, suppliers, vendors, clients and contractors).

Anyone from BRAC who assists the offender in any form which is conducive to sexual exploitation, abuse and harassment will also be liable for the misbehaviour.

4. Definitions:

4.1 Zero Tolerance: BRAC takes a zero tolerance policy to any form of sexual harassment.

4.2 Sexual harassment: Any unwelcome direct, indirect, physical, verbal or nonverbal conduct of a sexual nature. It is important to recognise that sexual harassment can happen to men, women as well as other gender of all ages. Nevertheless, due to prevailing gender perceptions, it is more often that women face sexual harassment. An act which may be thought to be inoffensive in a situation or cultural context may still be considered sexual harassment. This policy makes it clear that any unwelcome behaviour which carries sexual content is to be regarded as sexual harassment, **whether that was the intention or not.**

4.3 Sexual exploitation: means 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.

4.4 Sexual abuse: means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

4.5 The two most typical forms of sexual harassment in the workplace are unwelcome sexual advances, request for sexual behaviours, and other verbal or physical conduct of a sexual nature through-

- **Abuse of authority** committed by a person in a position of seniority or authority directly or indirectly against their subordinates, designed to humiliate or intimidate (in exchange for work related benefits (*e.g. a wage increase, a promotion, training opportunity, a transfer or the job itself*)). As a result, the victim/survivor is likely to feel powerless to act.
- **Creating hostile environment** through any unwelcome sexual advance, request for sexual favours or other verbal or physical conduct of a sexual nature which interferes with an individual's work performance or creates an intimidating hostile, abusive or offensive work environment, such harassment can occur against staff in all types of power relations.

BRAC employees are expected to behave professionally at all times with all colleagues, all members of the public and all other stakeholders including programme participants, suppliers, vendors, contractors, service providers, indirect employees (recruited by contractors) with whom we work and come in contact during the course of work. Similarly, all stakeholders who are engaged with BRAC must be informed about the Sexual Harassment Elimination policy so that same conduct is expected from them.

4.6. Negative impact of sexual harassment, exploitation and abuse on BRAC staff and participants

- Individual employees often suffer from experiencing mental and physical distress.
- Intimidation makes employees less comfortable at work, staffs are less willing to take on new responsibilities, less creative, less productive, morale suffers, output declines and competent staff leave BRAC.
- Negative attitudes are generated about BRAC externally and BRAC is unable to recruit high-quality staff.
- BRAC may face legal action regarding its failure to protect against sexual harassment.
- BRAC is not trusted by programme participants and communities.

4.7 Positive impact of a harassment (exploitation and abuse) free environment in BRAC

- BRAC proudly upholds human rights.
- Employees have professional and positive attitude, mutual respect and support.
- Employees feel encouraged to take up new tasks and responsibilities, women staff are encouraged to move up in the organisation and the working culture of the organisation is enhanced.
- A productive workplace environment encourages creativity and good quality work.
- The reputation of the organisation is upheld, meaning BRAC continues to be supported by a productive workforce, donors and investors to continue in its mission to ensure the survival and empowerment of those that it works for.

- Employee drop-out ratio decreases and diversity and harmony is increased and best practices are promoted.
- Programme participants' trust on BRAC is strengthened.

4.8. Why victim/survivors tend to conceal sexual harassment

The fear of being socially stigmatised refrains victim/survivors, especially women, from reporting an incident of sexual harassment. The reality is that most cases go unreported. Therefore, it is not always possible to get an actual estimation of the incidents of sexual harassment.

The following are some reasons why an employee might conceal an incident of sexual harassment.

- The possibility of being doubted or not believed
- Fear of being blamed for the incident
- Fear of job loss
- Fear of being transferred far from home or to a location difficult to reach
- Fear of being forced to resign
- Fear of the perpetrator (who may hold a superior position)
- Procedural complexity
- Fear of facing more harassment in the workplace
- Fear of damaging one's reputation
- Lack of evidence and witnesses
- Fear of non-cooperation by supervisor and colleague
- Fear of being victim/survivor by hostile working environment

4.9. Conducts Considered as Sexual Harassment¹

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Verbal:

- Insulting and referring to someone with derogatory names
- Making sexual comments about a person's or someone else's body (E.g: women's gynaecological matters), appearance, clothing and looks
- Turning work discussions to sexual topics
- Telling sexual jokes or stories
- Asking personal questions about social or sexual life (sexual fantasies, preferences, or history)
- Condescending or paternalistic remarks
- Propositioning or requesting for sexual favours.
- Telling lies or spreading rumours about a person's personal life
- Exerting pressure or giving threats in case of refusal to love/marriage proposal
- Sending sexually suggestive messages through letters, calls (any form) SMS, MMS, pictures, emails, different communication apps(E.g.: Skype, Viber, imo, Whatsapp, we chat), social media (i.e. Facebook, twitter, LinkedIn), notices, cartoons, or writing on

¹ <http://www.un.org/womenwatch/osagi/pdf/whatish.pdf>

benches, chairs, tables, notice boards, office walls, factory walls, classrooms, and washrooms etc.

- Implicitly and explicitly using/ condoning sexual behaviour to threaten or insult someone and to control/ influence/ affect the pay/ terms and conditions of employment/ job promotion or career of a staff member

Non-verbal:

- Looking or staring at a person that makes them uncomfortable
- Following a person
- Whistling, leering or making kissing sounds at someone
- Giving personal or suggestive gifts
- Displaying or disseminating sexually suggestive visuals (pornography)
- Making sexual gestures through body movements, facial expressions or gestures
- Taking photographs or videos for the purpose of blackmail or disgrace
- Preventing participation in sports, cultural, organisational, or academic activities on the ground of sex and/ or for the purpose of sexual harassment

Physical:

- Giving a massage around the neck or shoulders
- Touching a person's clothing, hair, or body (hugging, kissing, patting, pinching, stroking and/or fondling)
- Blocking a person's path
- Touching or rubbing oneself sexually around another person
- Physical violence including sexual assault
- Standing close or brushing up against another person
- Any other physical contact which implied sexual nature or sexuality

All sexual harassment is prohibited wherever it takes place

Special Note: Rape or attempt to rape is not only sexual harassment but in fact sexual *assault¹ and considered as a criminal offence. As incidents of sexual harassment have escalated and led to rape or attempt to rape, BRAC has included rape or attempt to rape in its SHE policy as a punishable offence as per law of the land. Expressing sexual interest or engaging in any sexual activities with boys and girls under the age of 18 is considered sexual abuse and punishable by the law. The details about actions for rape cases are given in annex-1.

5. Policy Statement

BRAC commits to be **victim/survivor centric and service oriented** in confronting sexual harassment, exploitation and abuse of all kinds following the stages of prevention, reporting, response and learning at all levels of work.

5.1 Prevention

One of main priorities of BRAC is to prevent such heinous act from ever happening. The preventive measures will be:

- Orientation about current sexual harassment elimination policy during every employees on boarding
- Having a systematic process to vet all prospective job candidates in accordance with established screening procedures.
- Victim/survivor centric approach training for all staff
- Refresher training for all employees after certain intervals
- Create campaigns/event calendar to support, create awareness among staffs and stakeholders on regular basis with maximum support of digital platforms
- Circulate/display a short version of sexual harassment policy procedures at all locations within BRAC establishment
- Disseminate messages (print/visual/audio/drama) as appropriate on sexual harassment elimination for programme participants and other stakeholders.

5.2. Partnership

- All BRAC contracts and partnership agreements include a standard clause requiring contractors, suppliers, consultants and sub-partners to commit to a zero-tolerance policy on sexual harassment, exploitation and abuse and to take measures to prevent and respond to such misconducts.
- The failure of those entities or individuals to take preventive measures against sexual harassment, exploitation and abuse, to investigate allegations thereof, or to take corrective action when SEA has occurred, shall constitute grounds for termination of any cooperative arrangement.

5.3. Reporting Mechanism

BRAC has safe, confidential and accessible mechanisms and procedures for employees, volunteers and programme participants to report sexual harassment, exploitation and abuse allegations and ensures that people are aware of these mechanisms.

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. BRAC recognises that sexual harassment may occur in unequal relationships and that it may not be possible for the victim/survivor to inform the alleged harasser. If felt that he/she or someone else has been the recipient of sexual harassment, complain should preferably be lodged as soon as such incident (maximum within 30 days) takes place.

Report can be made by victim/survivor, peers, supervisors or witnesses following the helplines as referred below.

- **Direct Complaint:** Those which are initiated by the victim/survivor themselves. Complain are received through letters, phone calls, sms and emails. Report can be lodged immediately through any of the following ways:
 - **Calls:** Anyone can call to lodge a complaint 24/7 through the phone numbers of safeguarding focal points or Head of HR or Country Representative. These numbers are available in all offices of BRAC
 - **Emails:** Complain can be lodged through email of the contact persons mentioned above or can be lodged to bi.safeguarding@brac.net, voice.international@brac.net and voice.countryname@brac.net (i.e voice.uganda@brac.net, voice.@afghanistan @brac.net)
 - Report can also be lodged directly to respective Regional Director, HR Director of BRAC International Head Office or the Executive Directors.

- **Indirect Complaint:** Those which are initiated on behalf of the victim/survivor. If the victim/survivor feels uncomfortable, he/she can inform the immediate supervisor or safeguarding focal person or a peer to report for further actions. Same procedure as above is followed for indirect complaint and it is handled with same importance as that of direct complaint.

All sexual harassment complaints shall be addressed to HRCC (Human Resource Compliance Committee) through Safeguarding focal point or Head of HR or the Country Representative. Complaints of Sexual Harassment addressed to any other authority (e.g. a departmental head or the like) shall also be sent to HRCC.

Special Note: All complaints and investigations are treated confidentially to the extent possible and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation and adequate steps are taken to ensure that the complainant is protected from retaliation during and after the investigation.

- **Complaints against external parties:** When a BRAC staff wants to lodge a complaint to and against any external parties (partner, donor, supplier, community), it must be done following a protocol (attached as annex - 3).

5.4. Response

BRAC has a process for investigation of sexual harassment, exploitation and abuse allegations in place. If required, an investigation is conducted without unnecessary delay. The investigation team is sent out to the victim/survivor's location as soon as possible, or considering safety, the victim/complainant can be temporary relocated to another working area of BRAC. If needed, the case can be referred to proper external investigative body (eg. Local authority) if the perpetrator is affiliated with another entity. The response process is headed by the HRCC team of the Country.

- The first priority is to attend to the victim/survivor.
 - Listen from the victim/survivor and record the statement in writing with prior permission of the victim/survivor.
 - The questions asked to the victim/survivor must not be offending and the questioner must be trained in asking appropriate questions. Preferably the questioner should be a female.
 - Must be sensitive to questioning and ensure that the victim/survivor does not “re-live” the experience.
 - The questioner must make sure that the responses are kept confidential.
 - The victim/survivor should not be disturbed by having too many interviews about the incident.
- After taking the victim/survivors statement, the victim/survivor will be asked what kind of safety measures and outcome they desire. The team will let the victim/survivor know of the next procedure/steps.
- BRAC will provide support services to the victim/survivors as required as per their needs and consent. BRAC can give this service on its own or refer the victim/survivor to appropriate organisations for any of the services mentioned below:
 - **Medical Support:** Any and all medical support for victim/survivor after an incident takes place.
 - **Legal Support:** BRAC will help in getting legal support for cases that requires state interventions.

- **Psychosocial Support:** Victim/survivors may require psychosocial counselling after an incident to help them cope with such situation. The counsellor will counsel at the victim/survivor's location.
 - **Rehabilitation Support:** BRAC will ensure that the work environment is not harmful to the victim/survivor. If needed, the victim/survivor will be transferred to another location.
 - **Leave:** The victim/survivor may be given special leave to rest and recover from the trauma experienced.
- If required, the perpetrator will be withdrawn from the victim/survivor's location and temporarily transferred/ /attached to different locations.
 - The accused will be given a chance to speak and defend her/his self.
 - The member secretary of HRCC (Head of HR) receives the complaint and place it before the HRCC. The Chair of HRCC (Country Representative) shall give other members to express their views before taking decision, in case of any urgency, views/opinions can be sought through e-mail if the member cannot be present at the meeting.
 - HRCC may dismiss a complain suspended if it is found to be frivolous or if there is no prima facie case and all other cases shall be sent for investigation to the investigation team.
 - HRD shall send a notice to the accused informing that the team shall be coming to conduct an investigation and to remain in office (As it is a sexual harassment allegation a first show cause at this point is not necessary. One show cause after investigation will suffice).
 - After investigation the investigation committee shall send the investigation report to the HRCC for review and one copy to HR Director of BI Head Office. During investigation apart from oral evidence emphasis shall be placed on circumstantial evidence.
 - In the case of confirmation of allegation, the HRCC shall instruct HRD to issue a show cause notice to the accused as to why punishment shall not be imposed against him, and give the accused an opportunity of hearing, if he so requests. The accused shall be given 7 days to respond to the show cause notice. If no response is provided the HRCC shall forward the investigation report with decision for action to the HRD. In case of a response and/or if a hearing is requested the HRCC shall hear the accused. After hearing the HRCC shall forward the investigation report with decision to the HRD.
 - Investigation committee or any other person related with the case may be called upon to present before the HRCC.
 - HRCC shall also give decision regarding security and safety of the complainant/victim.

Special Note: The whole process will not take more than 45 days after a complaint has been lodged.

5.5. False Accusation:

If it is proved that the complaint filed was done with ill motive then a report will be submitted to HRCC with regards to the falsification of the accusation. The committee will take decisions on the basis of the view expressed by majority of its members.

5.6. Appeal:

The staff member, national or international, may appeal against any disciplinary decision in writing to the Country Representative/Chief Executive Officer or Head of HRD within 07 (seven) calendar days. In the event of an appeal, and any further evidence provided, the HRCC may require further investigation, change or release

the disciplinary action, or proceed with the original recommendation of investigation report.

Special Note: After receiving a complaint, care should be taken so that the accused cannot influence the accuser to change or withdraw the complaint. Until a final decision is made, the local supervisor should ensure the protection and security of the accuser and/or victim/survivor.

Resignation from the accused or accuser is not accepted when an investigation is on-going.

5.7. Learning

Each case is different and BRAC considers each case with equal importance. BRAC will keep records (confidential and prudent) of such incidents and use the experience to improve the current policy as well as the system.

- A complete case file will be kept with all the actions and decisions taken by the HRCC and maintained as confidential file by HRD. The learnings from such cases will be compiled as a report and presented to the board and will be used as preventive measures against any harm, abuse, harassment, and exploitation.
- Evaluate the overall service provided to the victim/survivor and take feedback from the victim/survivors after providing service to learn the scope of improvement for future.

6. Responsibilities Framework

6.1 Responsibilities of Victim/survivor:

- Be firm in protesting any acts of sexual harassment.
- Inform trusted colleague(s) and supervisor(s) immediately after an incident takes place.
- Preserve necessary information, evidences and documents which will help to establish the complaint.
- Lodge a complaint or contact respective safeguarding focal point as soon as possible.

6.2 Responsibilities of Safeguarding/PSEA Focal Point:

- Support senior management to meet their SHE related responsibilities.
- Receive concerns or issues with SHE policy implementation to senior management.
- Receive complaints related to “sexual harassment, exploitation and abuse” and coordinate the response.
- Advise complainant/victim on how to lodge a complaint.
- Maintain high level of confidentiality about the complaint and complainant.
- Follow up with HRD on the progress of investigation or decision of the complaint.
- Provide accurate information to the investigation team regarding the case.
- Coordinate with other relevant actors on SHE, including inter-agency efforts.

6.3 Responsibilities of Human Resource Department:

- Conduct screening of past SHE violations, and other code of conduct and policy violations (e.g. fraud, corruption, abuse of power), as part of recruitment process.
- Ensure all employees sign on BRAC’s code of conduct and kept in personnel files.
- Ensure SHE clause in contract agreements, including sub-contracting.
- Ensure that all employees are oriented with SHE policy.
- Receive complaints and convene a meeting with HRCC members.
- Support communication with personnel during investigation of SHE allegations.

- HRD will file the report in the personal file of the accused and will take it into consideration during annual performance assessments
- Ensure that the case is recorded properly and file is confidentially maintained.
- Implement decisions HRCC which related to sexual harassment through notifications
- Modify and update policy and disciplinary process according to changes in time, context and learning
- Coordinate with other organizations (including donors) regarding sexual harassment, exploitation and abuse policy.

6.4 Responsibilities of HRCC (Human Resource Compliance Committee):

- Receive and manage complaints related to code of conduct and other policies.
- Ensure complaints are responded to quickly and keeping the complainant updated.
- Ensure protection and security of the complainant.
- Form the investigation team when required and monitor the team for timely submission of report.
- Takes decision on action after review of investigation report.
- Ensure all complaints are recorded and action taken to address the complaints.
- Ensure the complainant is informed about decision of HRCC regarding the complaint lodged.
- Ensure that the entire process is done within time.

6.5 Responsibilities of Manager/Supervisor:

- Inform and provide insights to all team members about the organisation's zero tolerance policy on sexual harassment, exploitation and abuse.
- After receiving a complaint, immediately inform either Safeguarding Focal Point or Head of HRD for further action.
- Ensure job security and provide the required advice and support to the victim/survivor and the witnesses and protect the accuser from any criticism or unpleasant situation
- Assist and support investigation team in a bias-free investigation process, maintain confidentiality and implement a punishment if an offence is proved
- Discuss the complaint with due importance in the monthly field-level coordination meetings (without disclosing any personal information)
- If required, contact respective committee and help implement disciplinary issues taken by HRD.
- Be proactive in addressing the issues and concerns of a colleague before the situation worsens.
- Review and update SHE policy, procedure and guidance.
- Ensure attention and resources to PSEA across organization

6.6 Responsibilities of Colleagues/Peers/Employees:

- Uphold Code of Conduct, Safeguarding and related policies.
- Actively participate in safeguarding, SHE and other related trainings and awareness raising efforts.
- Be committed against sexual harassment/abuse/exploitation and resist it collectively.
- Report or help to report allegations of SHE policy through designated reporting channels.
- Cooperate during investigations, maintain confidentiality, and provide a neutral testimony.
- Instead of indulging into unnecessary discussion, criticism, or gossip, take preventive measures through respective committee.
- Be sensitive towards the victim/survivor and provide necessary support, and create awareness among other employees about sexual harassment issues.
- Identify and mitigate/avoid SHE related programme risks.

7. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with sexual harassment 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.

8. Review of Policy and Procedure

The policy will be reviewed at a minimum of every 3 years or when it is shown necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.

ANNEX 1- Actions that have to be taken in case of rape or attempt to rape:

1. The organisation shall take steps to secure the safety and security of the victim/survivor, acting in a way that is respectful and confidential.
2. Any supervisor so informed must submit a statement to the Country Representative, the Regional Director and HR Director of BRAC International.
3. BRAC will ensure that a medical check is carried out promptly, local lawyers are contacted and, with the consent of the victim/survivor, that the accused is prosecuted in court with the full support of BRAC.
4. BRAC will bear all expenses of conducting the lawsuit and of any medical treatment required by the victim/survivor, including all reasonable steps to ensure social and family level rehabilitation and support.
5. Legal support and counselling may be provided as required and based on the country context and domestic law of the land.

ANNEX 2- HRCC:

Human Resource Compliance Committee (HRCC):

The Human Resource Compliance Committee ensures that all complaints, including sexual harassment, exploitation and abuse, in the country are received, registered and responded to, as complaint management guideline. Country Representatives will ensure that all complaints are quickly recorded and action taken timely to address the complaints. They will also ensure security of the complainant and inform them about decision of the organization.

ANNEX 3 – Protocol to report Sexual Harassment incident(s) against external parties

Guideline for BRAC staffs to report safeguarding breaches of external parties

BRAC works with various partners to implement programmes aiming for poverty eradication and social justice. One of the priorities of BRAC is to have safeguarding procedures of all stakeholders associated with BRAC's work. BRAC has a clearly defined mechanism for reporting and response when BRAC staffs are at fault in safeguarding breaches. Similarly, a clear guideline should be introduced on the reporting procedure when BRAC staff are victim/survivor of safeguarding breaches

by external parties, e.g. programme participants, community, partner NGOs, government/ local government, donors, other NGOs, other organizations or others. This document outlines the steps to be followed in such cases.

Following steps should be taken in case any BRAC staff (including regular, service grade, contractual, project staff, volunteers etc.)

1. A staff who is a victim of abusive behavior by any external parties should immediately report the incident to his/ her 1st supervisor (immediate supervisor).
2. The 1st Supervisor (immediate supervisor) should acknowledge the complaint by verbally or written medium. Within the next 24 hours, the supervisor will inform the complainant about the progress of the complaint.
3. If the complainant does not receive any progress update from the 1st supervisor (immediate supervisor) within 24 hours, he/ she will report the complaint to the 2nd supervisor (skip level supervisor).
4. The 2nd supervisor (skip level supervisor) should acknowledge (written or verbal) the complaint. The supervisor will then inform the complainant about the progress of the complaint within the next 24 hours.
5. If the complainant does not receive progress update from the 2nd supervisor (skip level supervisor) within 24 hours, he/ she will report the complaint to the respective Zonal HR Manager (for field) or respective HR partner (for head office).
6. The identity of the complainant shall remain confidential in every step and safety precaution will be ensured by the respective programme. HR needs to be notified in case any immediate psychosocial or any other support is needed.

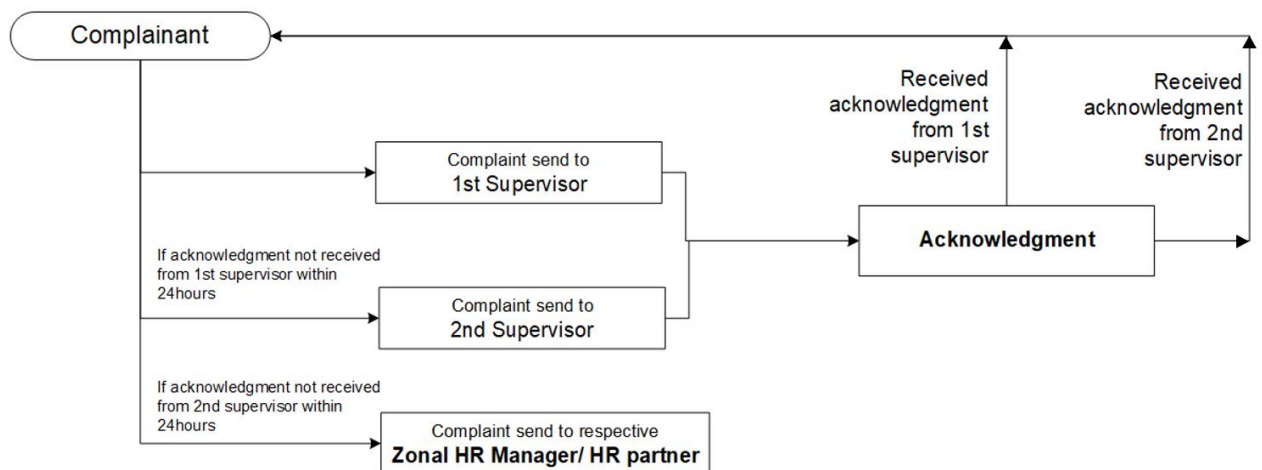
Few steps for preventive measures:

1. All agreements or MOUs between BRAC and external organizations should have a clause on safeguarding, reporting mechanism and consequence of its breaches.
2. BRAC programme should have the contact address of safeguarding focal persons of external organizations with whom they engage.
3. With support from Safeguarding unit, a short orientation should be conducted by the safeguarding focal point of the programme/ department when engaging with external party.
4. All supervisors of the respective programmes should be made aware of possible risk and safety precautions before assigning any task to his/ her supervisee/s.
5. All BRAC programme and departments must ensure that staff is well aware of using the complaint mechanism appropriately in case of harassment or abuse, both internal and external.

Flowchart to report safeguarding breaches of external parties

BRAC Staff will be able to complaint through different channels according to the type of external parties:

- Programme participants
- Community
- Partner NGOs
- Government/ Local Government
- Donors
- Other NGOs
- Other organizations
- Others



**All cases will be recorded by the Safeguarding team