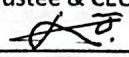
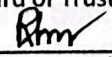




BANGLADESH DISABLED DEVELOPMENT TRUST (BDDT)

Protection Against Sexual Exploitation, Abuse and Harassment (PSEAH) POLICY

Document Details	Authorized by	Approved by
<p>Version: 1.0</p> <p>Date: 12 March 2026</p> <p>Review: Every 3 years</p> <p>Language: English / Bangla</p>	<p>Md. Moniruzzaman Khan Managing Trustee & CEO</p> <p>Signature: <u></u></p> <p>Date: <u>11.05.2026</u></p> <p>Md. Moniruzzaman Khan Founder and Managing Trustee Bangladesh Disabled Development Trust 20, Barabagh, Mirpur-2, Dhaka.</p>	<p>Rahnuma Ara Khan Majlis Chairman, Board of Trustees</p> <p>Signature: <u></u></p> <p>Date: <u>11.05.2026</u></p> <p>Rahnuma Ara Khan Majlis Chairman Bangladesh Disabled Development Trust 20, Barabagh, Mirpur-2, Dhaka.</p>

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Section 1: Background and Organizational Context

Bangladesh Disabled Development Trust (BDDT) is a disability-led non-governmental Organization of Persons with Disabilities (OPD), established in 2007. BDDT is registered under the Trusts Act 1882 (Registration No. IV-22, dated 26 July 2007) and holds NGO Affairs Bureau registration (No. 2429, dated 28 April 2009) under Bangladesh's Foreign Donation (Voluntary Activity) Regulations Rules 1978. BDDT is also registered with the UN Global Marketplace (UNGM), and holds a Tax Identification Number (TIN) and VAT Registration Number (BIN).

BDDT works to improve the lives and livelihoods of persons living with disabilities (PLWDs) across Bangladesh through skill development training, income generating activities, human rights promotion, rehabilitation services, educational support, capacity building, prevention of violence against women, health care access, and emergency response during disasters. BDDT operates primarily in Dhaka and the coastal districts of Barguna and Barisal, running a Polytechnic Institute, a Computer Training Centre, and an accommodation facility for visually impaired women.

As a disability-led OPD, BDDT operates in environments where persons with disabilities, especially women and girls with disabilities face significantly elevated vulnerability to sexual exploitation, abuse, and harassment (SEAH). BDDT's work creates direct, sustained, and trust-based relationships with vulnerable individuals, making robust PSEAH systems not merely a compliance requirement but a moral imperative.

BDDT is committed to maintaining partnerships with UN agencies including UNICEF, UNFPA, UNOPS, UNHCR, WHO, WFP, and others, and to meeting the requirements of the UN Implementing Partner (IP) Protocol on Allegations of Sexual Exploitation and Abuse (2018). This PSEAH Policy has been developed to fully align with the 8 Core Standards of the UN Harmonised PSEA Assessment Tool used by all participating UN entities.

BDDT's Commitment to the 8 UN PSEA Core Standards

#	Core Standard	BDDT Policy Section	Status
1	Organisational Policy	Section 6	✓Met
2	Organisational Management Subcontracting	Section 7	✓Met
3	Human Resources Systems	Section 8	✓Met
4	Mandatory Training	Section 9	✓Met
5	Reporting	Section 10	✓Met
6	Assistance and Referrals	Section 11	✓Met
7	Investigations	Section 12	✓Met
8	Corrective Measures	Section 13	✓Met



Section 2: Legal Basis, Status and Amendment

2.1 Legal Basis and Status

This PSEAH Policy is adopted under the authority of the BDDT Constitution (Trusts Act 1882) and the BDDT Board of Trustees, and is binding on all persons and entities within its scope. It operationalizes BDDT's commitments in its statutes and aligns with relevant national legislation of Bangladesh and the UN Secretary-General's Bulletin ST/SGB/2003/13 on Special Measures for Protection from Sexual Exploitation and Abuse.

2.2 Applicable National Laws and International Frameworks

Bangladesh National Legal Framework	International Frameworks & Standards
<ul style="list-style-type: none"> Women and Children Repression Prevention Act 2000 (amended 2020) Rights and Protection of Persons with Disabilities Act 2013 Child Marriage Restraint Act 2017 Bangladesh Labor Act 2006 (as amended) Bangladesh Penal Code 1860 (sexual offence provisions) National Children Policy 2011 Supreme Court Guidelines on Prevention of Sexual Harassment (Writ Petition No. 5765/2008) Neuro-Developmental Disability Protection Trust Act 2013 	<ul style="list-style-type: none"> UN Secretary-General's Bulletin ST/SGB/2003/13 (2003) UN IP Protocol on PSEA (2018) CRPD (ratified by Bangladesh 2007) CEDAW (ratified by Bangladesh 1984) CRC (ratified by Bangladesh 1990) IASC Six Core Principles on PSEA UN Harmonised PSEA Assessment Tool (8 Core Standards) IASC Minimum Operating Standards on PSEA (2013)

2.3 Amendment Authority

This policy may be amended by decision of the BDDT Board of Trustees, in accordance with Article 22 of the BDDT Constitution. Amendments shall be communicated to all staff, partners, volunteers, and relevant stakeholders promptly.

2.4 Relationship with National Law

Where any provision of this policy conflicts with the laws of Bangladesh, the applicable national law shall prevail. BDDT will promptly review and revise this policy to restore full alignment. The interpretation authority rests with the BDDT Board of Trustees or its delegated sub-committee.



Section 3: Definitions and Key Terms

The following definitions are aligned with those of the United Nations (ST/SGB/2003/13, 2003) and the UN Harmonised PSEA Assessment Tool.

Term	Definition
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting monetarily, socially, or politically from the sexual exploitation of another. Covers coerced acts of a sexual nature, including through force, threats, or abuse of power (per ST/SGB/2003/13, para 1).
Sexual Abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (under 18) constitutes sexual abuse regardless of consent (per ST/SGB/2003/13, para 1).
Sexual Harassment	Unwelcome sexual advance, request for sexual favours, or verbal, non-verbal or physical conduct of a sexual nature in the workplace or work-related context that creates a hostile, humiliating or intimidating environment.
SEAH	Collective acronym used throughout this policy to refer to Sexual Exploitation, Abuse and Harassment.
PSEAH	Protection against Sexual Exploitation, Abuse and Harassment – the full framework of policies, systems and practices to prevent and respond to SEAH.
Survivor	A person who has experienced SEAH. The term 'victim' may also be used in a legal or UN context. This policy uses 'survivor' to affirm agency and dignity.
Grooming	A process of developing trust and emotional connection with a person (and sometimes their family) with the intent of later committing exploitation or abuse.
Whistle-Blower	A person who reports misconduct, including SEAH, in good faith. Protected from retaliation under this policy.
Implementing Partner	An entity to which BDDT or a UN entity has entrusted programme implementation under a signed agreement (per UN IP Protocol 2018 definition).
Subcontractor	An entity (not an individual) contracted by BDDT to carry out activities under a programme or project.



Term	Definition
PSEA Focal Person	A designated BDDT staff member or board member responsible for coordinating PSEA prevention, response, training and reporting.
Child	Any person under the age of 18 years (per CRC and Bangladesh law).
Zero Tolerance	No act of SEAH is acceptable; every allegation is acted upon; inaction is itself a violation.



Section 4: Scope and Applicability

This policy is mandatory for ALL of the following, whether compensated or voluntary, full-time or part-time, in Bangladesh or internationally:

BDDT Internal Personnel	External Parties
<ul style="list-style-type: none"> • Board of Trustees (all members) • Full-time and part-time staff/employees • Temporary and project-based staff • Volunteers and interns • Individual consultants • Trainees and fellows 	<ul style="list-style-type: none"> • Implementing partner organizations • Subcontractors (organizational) • Suppliers and vendors of goods/services • MoU partners and OPD members • Visitors on BDDT premises • Any person acting on BDDT's behalf

This policy applies in ALL contexts: within and outside the workplace; during and outside working hours; in program activities; emergency response operations in Barguna and coastal areas; the BDDT accommodation facility for visually impaired women; BTEB-registered training centres; and online/digital spaces where BDDT personnel are acting in a representative capacity.



Section 5: Guiding Principles

This policy is grounded in the following six principles, aligned with the IASC Core Principles on PSEA:

Principle 1: Zero Tolerance

Sexual exploitation, abuse and harassment are never acceptable under any circumstances. Every allegation will be acted upon in a fair, timely and transparent manner. Inaction is itself a violation of this policy. Zero tolerance does not mean zero incidents, but it does mean zero complacency.

Principle 2: Strong Leadership

BDDT's Board of Trustees, Managing Trustee, and all senior management shall lead by example, set the organizational culture, model respectful behaviour, and ensure PSEAH is a standing agenda item at all governance meetings.

Principle 3: Survivor-Centered Approach

All responses to SEAH shall prioritize the rights, safety, dignity, and wishes of the survivor. A 'do no harm' principle guides all actions. Survivors retain the right to informed consent on all referrals and processes, except where national law requires mandatory reporting.

Principle 4: Shared Responsibility

Preventing SEAH is everyone's responsibility. Every BDDT staff member, volunteer, board member, partner, and contractor shares an obligation to prevent, recognize, and report SEAH.

Principle 5: Gender and Disability Equality

BDDT recognizes that women and girls with disabilities face intersecting vulnerabilities. SEAH prevention and response must be gender-sensitive, disability-inclusive, age-appropriate, and free from discrimination. BDDT's particular mandate to serve persons with disabilities heightens its duty of care.

Principle 6: Accountability and Transparency

BDDT acknowledges its accountability to donors, partners, UN entities, communities, and persons with disabilities. Stronger reporting, monitoring, and learning systems will be used to continuously improve safeguarding.



Section 6: Core Standard 1 – Organizational Policy

CORE STANDARD 1 Organisational Policy

Assessment Criterion: The partner has a policy document on PSEA that includes, at minimum: definitions aligned with the UN (ST/SGB/2003/13); an explicit prohibition of SEA / zero tolerance; and reporting obligations requiring all allegations to be promptly reported.

BDDT's Core Standard 1: Organisational Policy

This document itself constitutes BDDT's formal, Board-approved PSEAH Policy, meeting and exceeding the minimum requirements of UN Core Standard 1. BDDT explicitly commits to:

- **UN-Aligned Definitions:** All definitions in Section 3 are drawn directly from or substantially similar to ST/SGB/2003/13 (2003), the authoritative UN standard.
- **Explicit Prohibition:** BDDT operates a strict zero-tolerance policy toward all forms of SEAH by all personnel, partners, and associated parties, without exception.
- **Mandatory Reporting:** All allegations of SEAH must be promptly reported through the designated channels in Section 10. Failure to report is itself a violation of this policy.
- **Whistleblower Protection:** Any person who reports SEAH in good faith is protected from retaliation. Retaliation is treated as a separate disciplinary offence.
- **Clear Roles and Responsibilities:** A designated PSEA Focal Person holds responsibility for PSEA coordination, training, and reporting (see Section 8).
- **Accessible Language:** This policy will be made available in Bangla and in accessible formats (Braille, audio, Easy Read) for BDDT's beneficiary communities, particularly visually impaired persons.
- **Mandatory Signature:** All personnel must sign the PSEAH declaration (Appendix D) upon engagement and annually thereafter.

Supporting Documents for Assessment:

- This PSEAH Policy (approved by Board of Trustees, 07 March 2026)
- BDDT Code of Conduct (approved November 2020)
- BDDT PSEAH Code of Conduct (Appendix C of this policy)
- Staff Declaration Form (Appendix D of this policy)
- Personnel contracts including PSEA clause



Section 7: Core Standard 2 – Organizational Management & Subcontracting

CORE STANDARD 2: Organisational Management – Subcontracting

Assessment Criterion: Partner's contracts and partnership agreements include a standard clause requiring sub-contractors to adopt policies that prohibit SEA and take measures to prevent and respond to SEA.

7.1 Leadership Commitment to PSEAH

The BDDT Board of Trustees holds ultimate accountability for the implementation of this PSEAH Policy. The Managing Trustee is responsible for day-to-day compliance. BDDT's PSEA Focal Person (designated by the Managing Trustee) is responsible for implementation, training, and reporting. PSEAH is a standing agenda item at all Board of Trustees meetings (held quarterly per Article 15 of the BDDT Constitution).

7.2 Standard Subcontracting Clause

BDDT requires all subcontractors (organizational entities contracted to carry out programme activities) to comply with BDDT's PSEAH standards. The following standard clause is mandatory in all contracts, MoUs, and partnership agreements with subcontractors

STANDARD PSEAH SUBCONTRACTING CLAUSE

"The Subcontractor agrees to: (a) prohibit sexual exploitation and abuse (as defined in UN ST/SGB/2003/13) by all its personnel; (b) conduct mandatory PSEA screening of all personnel prior to engagement; (c) provide mandatory PSEA training for all personnel; (d) immediately notify BDDT upon receiving any allegation of SEA involving its personnel; (e) investigate any allegation of SEA promptly, impartially, and confidentially; (f) refer victims of SEA for immediate, professional assistance; and (g) take appropriate disciplinary action when SEA is substantiated. Failure to comply with these obligations constitutes grounds for immediate termination of this agreement and referral to relevant authorities. The Subcontractor shall ensure that these obligations flow down to any sub-sub-contractors engaged under this agreement."

7.3 Partner Due Diligence

Prior to entering any partnership, BDDT will review the partner's own PSEA policies and past SEA incidents. Partners that cannot demonstrate minimum PSEA capacities will be supported through a joint capacity-strengthening plan before programme activities begin.

Supporting Documents for UN Assessment:

- Sample MoU / Partnership Agreement with embedded PSEA clause
- Sample subcontractor contract with PSEA clause
- Partner selection and due-diligence checklist



Section 8: Core Standard 3 – Human Resources Systems

CORE STANDARD 3: Human Resources Systems

Assessment Criterion: Systematic vetting of job candidates including, at minimum: reference checks for sexual misconduct AND a self-declaration by the candidate confirming no prior sanctions for SEA. All contracts must include a PSEA clause.

8.1 Mandatory Pre-Employment Screening

BDDT implements the following mandatory screening procedures for all personnel (staff, consultants, volunteers, interns) BEFORE engagement:

#	Screening Requirement	Implementation Details
1	PSEA Self-Declaration	All candidates must complete and sign a PSEA Self-Declaration Form (template in HR Toolkit) confirming they have never been subject to disciplinary, administrative, or criminal sanctions related to SEA, or left employment while under investigation for SEA, or refused to cooperate in a SEA investigation.
2	Reference Checks for Sexual Misconduct	Mandatory reference checks with at least two previous employers using BDDT's structured reference check template, which explicitly asks about the candidate's history of sexual misconduct, investigation history, and suitability to work with vulnerable populations.
3	PSEA Clause in all Contracts	All contracts (staff, volunteer, intern, consultant, contractor) must include an explicit PSEA clause referencing BDDT's PSEAH Policy and Code of Conduct, and the disciplinary consequences of SEAH.
4	Code of Conduct Signature	All personnel must sign BDDT's PSEAH Code of Conduct (Appendix C) and the Declaration Form (Appendix D) before commencement.
5	Background Verification	Where legally feasible under Bangladesh law, BDDT will request police clearance certificates or criminal record checks for roles involving direct, regular contact with vulnerable persons with disabilities.

8.2 PSEA Focal Person – Terms of Reference

The BDDT Managing Trustee shall designate a PSEA Focal Person from among senior staff or Board members. The PSEA Focal Person's responsibilities include:

- Serving as the primary point of contact for all SEAH complaints and concerns.
- Coordinating PSEAH training for all BDDT personnel.



- Maintaining updated knowledge of SEAH, Bangladesh law, and UN PSEA developments.
- Supporting development and annual review of PSEA-related policies and procedures.
- Representing BDDT in interagency PSEA coordination forums and Bangladesh PSEA Networks.
- Monitoring implementation of this PSEAH Policy and reporting to the Board of Trustees.
- Maintaining a confidential SEAH case register (anonymized) and reporting aggregated data to management.

8.3 Personnel Records and Data Protection

All PSEA-related documentation (signed declarations, reference check results, training records, complaint files) shall be maintained in secure, confidential personnel files. PSEA records are retained for a minimum of seven years after engagement ends, to ensure that persons with substantiated SEAH findings are not re-hired.

Supporting Documents for UN Assessment:

- PSEA Self-Declaration Form template
- Reference Check template (with PSEA-specific questions)
- Sample staff/volunteer/consultant contracts with PSEA clause
- PSEA Focal Person Terms of Reference
- Recruitment procedures documentation



Section 9: Core Standard 4 – Mandatory Training

**CORE STANDARD 4:
Mandatory Training**

Assessment Criterion: Mandatory training for ALL personnel on PSEA including: (1) UN-aligned definition of SEA; (2) explicit prohibition; (3) required actions including prompt reporting and victim referral. Training required at onboarding and at regular intervals.

9.1 Training Requirements

Training Type	Target Audience	Frequency & Format
Induction PSEA Training	All new staff, volunteers, interns, board members	Within first week of engagement. In-person or online. Attendance mandatory.
Annual Refresher Training	All existing personnel	Once per year. In-person sessions at Dhaka HQ and Barguna field office.
PSEA Awareness Orientation	Partner organizations, OPDs, subcontractors	At the start of each partnership or project. Led by PSEA Focal Person.
Specialized Focal Person Training	PSEA Focal Person	Annually. External training facilitated by UN agencies, PSEA networks, or accredited training providers.
Community Awareness Sessions	Beneficiaries, hostel residents, programme participants	At programme inception and key milestones. Accessible formats (Bangla, Braille, audio, visual aids).

9.2 Mandatory Training Content

All PSEA training at BDDT must include the following minimum content elements (per UN Core Standard 4):

- **Definition of SEA:** Aligned with UN ST/SGB/2003/13 – covering sexual exploitation, sexual abuse, and sexual harassment as defined in Section 3.
- **Explicit Prohibition:** Zero-tolerance policy; prohibited conduct per BDDT's Code of Conduct and this PSEAH Policy.
- **Required Actions:** How to recognize warning signs; obligation to report promptly; how to access reporting channels; referral of victims for professional assistance.
- **Confidentiality and Survivor Protection:** How to handle information; protection of complainants and survivors.
- **Disability-Sensitive Content:** Specific vulnerabilities of persons with disabilities; communication considerations; disability-inclusive support.
- **Bangladesh Legal Framework:** Relevant national laws including the Women and Children Repression Prevention Act 2000.



9.3 Training Records and Compliance Monitoring

BDDT will maintain signed training attendance sheets for all PSEA training sessions. The PSEA Focal Person will monitor compliance and report annually to the Board of Trustees. Personnel who fail to complete mandatory training will not be assigned roles involving direct contact with beneficiaries until training is completed.

Supporting Documents for UN Assessment:

- Annual PSEA Training Plan
- Training agenda and materials
- Attendance sheets (maintained by PSEA Focal Person)
- Sample training certificates
- Training completion tracking system

Section 10: Core Standard 5 – Reporting Mechanisms

**CORE STANDARD 5:
Reporting**

Assessment Criterion: The partner has mechanisms for personnel AND beneficiaries to report SEA allegations, meeting core standards of accessibility, safety, confidentiality, transparency, and responsiveness. Partner must actively raise awareness of reporting channels with beneficiaries.

10.1 BDDT Reporting Channels

BDDT maintains the following multiple, accessible reporting channels. All channels are available 24 hours a day, 7 days a week:

Channel	Contact Details	Accessible To
PSEA Focal Person (Primary)	Contact details maintained internally and communicated to all staff and beneficiaries	All staff, volunteers, beneficiaries, community members
Managing Trustee (Escalation)	Md. Moniruzzaman Khan +88 01708487558 md.monirinan@gmail.com	All personnel and external parties
Dedicated PSEA Email	psea@bddt.org (monitored exclusively by PSEA Focal Person)	All personnel and external parties
PSEA Hotline/SMS	+88 01326893733 (dedicated PSEA number)	All personnel, beneficiaries, community members



Channel	Contact Details	Accessible To
Written Complaint Form	Available at: BDDT HQ (Mirpur-2, Dhaka); Barguna Field Office; BDDT Accommodation Facility	Walk-in reporting; also available in Braille
Anonymous Drop Box	Physical boxes at BDDT HQ and Barguna office; digital anonymous form at www.bddt.org/psea	Any person wishing to report anonymously
UN Entity PSEA Focal Point	Where BDDT is an implementing partner of a UN entity, allegations may also be reported to that entity's PSEA focal point	All BDDT personnel and beneficiaries on UN-funded projects

10.2 Standards for Reporting Mechanisms

All BDDT reporting mechanisms meet the following UN Core Standard 5 requirements:

- **Accessibility:** Available in Bangla and English; accessible formats including Braille and audio for visually impaired persons; cost-free to complainants; no literacy requirement for verbal/in-person reporting.
- **Safety:** Whistleblower protection guaranteed. No retaliation permitted. Reporter identity protected. Data stored securely.
- **Confidentiality and Anonymity:** All complaints handled with strict confidentiality. Anonymous reporting accepted (understanding that this may limit follow-up).
- **Transparency:** Complainants informed of procedures, who will receive information and for what purpose, including mandatory reporting obligations.
- **Responsiveness:** Initial acknowledgement within 48 hours. Preliminary assessment within 5 working days.

10.3 Duty to Report to UN Entity Partners

Where BDDT is an implementing partner of a UN entity, BDDT has a duty to report all SEAH allegations to the relevant UN focal point, in accordance with the cooperative agreement. Concealing information or deliberately giving incorrect information may result in suspension or termination of the partnership. BDDT will keep the UN entity informed throughout any investigation and will provide unredacted investigation reports upon request.

10.4 Beneficiary Awareness

BDDT will actively raise awareness of reporting channels among all beneficiaries, residents of the accommodation facility, and programme participants, through:

- PSEA information notices (in Bangla, with pictures) displayed at BDDT HQ, Barguna field office, accommodation facility, and training centres.
- Community awareness sessions at programme inception.



- Distribution of PSEA awareness materials in accessible formats (Braille, audio for visually impaired beneficiaries).
- Regular verbal briefings by BDDT field staff and caregiving staff.

10.5 Escalation Pathways

Allegation Involves	Escalation Pathway
Staff, volunteer, consultant, or contractor	Report to PSEA Focal Person → PSEA Focal Person reports to Managing Trustee → Investigation team appointed
Managing Trustee	Report directly to Chairman and Board of Trustees via PSEA Focal Person
Board of Trustees Member or Chairman	Report to Board of Trustees or General Assembly as per BDDT Constitution. May refer to independent external investigator.
PSEA Focal Person (alleged perpetrator or bias)	Report directly to Managing Trustee or Chairman
UN implementing partner project (any person)	Report to PSEA Focal Person AND to the relevant UN entity's PSEA focal point

Supporting Documents for UN Assessment:

- Description of reporting mechanisms (this section)
- PSEA Incident Reporting Form (Appendix E)
- PSEA awareness-raising materials (Bangla)
- Whistle-blower protection policy (embedded in this document and Code of Conduct)
- Evidence of reporting channel dissemination to beneficiaries

Section 11: Core Standard 6 – Assistance and Referrals

CORE STANDARD 6: Assistance and Referrals

Assessment Criterion: The partner has a system to refer SEA victims to locally available support services based on needs and consent. This can include contributing to in-country PSEA networks and/or GBV systems and/or referral pathways at an inter-agency level.

11.1 Commitment to Survivor-Centered Assistance

BDDT commits to ensuring that all survivors of SEAH allegedly perpetrated by BDDT personnel receive immediate, professional assistance, either directly or through referral, based on the survivor's needs and informed consent. Assistance will be:



- **Survivor-centered:** Guided by the survivor's rights, wishes, safety, and best interests.
- **Rights-based:** Respecting the survivor's rights to privacy, confidentiality, and self-determination.
- **Non-discriminatory:** Available to all survivors regardless of age, gender, disability type, religion, ethnicity, or sexual orientation.
- **Disability-sensitive:** Adapted to the communication, mobility, and access needs of persons with disabilities.
- **"Do No Harm":** Provided in a way that avoids re-victimization, re-traumatization, or exposure to further risk.

Assistance will be made available to all survivors of SEAH irrespective of whether the survivor initiates or cooperates with an investigation or any other accountability procedure.

11.2 Types of Support Services

Type of Support	BDDT's Approach
Safety and Protection	Immediate safety assessment; survivor safety planning; secure accommodation support where needed (including referral to BDDT's own accommodation facility for visually impaired women, if applicable and requested); relocation support if required.
Medical Care	Referral to government hospitals and One-Stop Crisis Centres (OCCs) for: post-exposure prophylaxis (PEP) for HIV within 72 hours; treatment for STIs; pregnancy care; emergency contraception. BDDT will facilitate accompaniment where the survivor consents.
Psychosocial Support	Referral to mental health and psychosocial service providers; peer support from trusted community members; access to professional counsellors through BDDT's partner network.
Legal Services	Referral to the National Legal Aid Services Organization (NLASO) of Bangladesh; women and child help desks at Dhaka Metropolitan Police and Barguna police stations; legal aid NGOs.
Basic Material Assistance	Emergency food, clothing, and shelter facilitated through BDDT's own resources and partner network where needed.
Support for Children	Specialized referrals for child survivors, in consultation with UNICEF Bangladesh country office and BDDT's child protection contacts.

11.3 BDDT Referral Directory – Bangladesh

BDDT maintains an updated referral directory of local service providers (see Appendix F), including:

- One-Stop Crisis Centres (OCCs) at Dhaka Medical College Hospital, Dhaka Shishu Hospital, and Barguna District Hospital
- National Legal Aid Services Organization (NLASO) – national and district offices



- National Women Lawyers Association (BNWLA) – legal aid and shelter
- UNFPA Bangladesh and GBV cluster member organizations in Dhaka and Barisal Division
- Women and child help desks at Dhaka Metropolitan Police and Barguna Police Station
- BDDT's own OPD and INGO network (UNFPA, UNWOMEN, Plan International, Article 19, HI, IFES)
- BDDT accommodation facility for visually impaired women (Mirpur-2, Dhaka) for safe shelter referrals

11.4 Referral Procedures

BDDT's PSEA Focal Person is responsible for:

- Maintaining an updated referral directory.
- Guiding survivors through available options in a trauma-informed, disability-sensitive manner.
- Obtaining informed consent before any referral (except where legally required to act without consent).
- Following up on referrals to confirm services were received.
- Contributing to interagency PSEA networks and GBV referral mapping in Bangladesh.

11.5 Active Contribution to Bangladesh PSEA Networks

BDDT is an active member of the UNFPA GBV Cluster in Bangladesh (since 2022) and will engage with the Bangladesh PSEA Network and interagency GBV coordination mechanisms to contribute to and benefit from shared referral pathways, capacity-building, and incident data.

Supporting Documents for UN Assessment:

- Referral Directory – Bangladesh Support Services (Appendix F of this policy)
- PSEA referral SOP (Standard Operating Procedure)
- GBV referral form / SEAH victim assistance form
- UNFPA GBV Cluster membership documentation

Section 12: Core Standard 7 – Investigations

CORE STANDARD 7: Investigations

Assessment Criterion: The partner has a process for investigation of allegations of SEA and can provide evidence. This may include a referral system for investigations where in-house capacity does not exist.

12.1 Investigation Framework

BDDT commits to conducting timely, impartial, confidential, and survivor-centered investigations of all SEAH allegations. BDDT's investigation process follows the five-stage framework below:

Stage	Step	Key Actions	Timeline
1	Receipt & Registration	Complaint received via any channel. Registered on SEAH Reporting Form (Appendix E). Immediate safety concerns addressed. Alleged perpetrator suspended from direct beneficiary contact if warranted.	Within 24–48 hours



Stage	Step	Key Actions	Timeline
2	Preliminary Assessment	PSEA Focal Person, in coordination with Managing Trustee, assesses immediate safety risks, determines interim protective measures, decides whether full investigation is warranted.	<i>Within 5 working days</i>
3	Investigation	Investigation team appointed (at least one trained member; gender balance maintained where possible). Interviews conducted with survivor (with consent), witnesses, alleged perpetrator. All information handled confidentially.	<i>Completed within 15 working days (documented extensions permissible)</i>
4	Decision and Action	Board of Trustees or delegated sub-committee reviews investigation report and determines proportionate action. Substantiated findings result in disciplinary action and, where criminally relevant, referral to Bangladesh authorities.	<i>Within 5 working days of receiving report</i>
5	Feedback and Closure	Survivor informed of outcome (subject to confidentiality and safety). UN entity partner informed per agreement. Case documented in confidential register.	<i>Within 3 working days of decision</i>

12.2 Investigation Principles

All investigations shall be conducted in accordance with the following principles:

- **Confidentiality:** All information is strictly confidential. Unauthorized disclosure is a disciplinary offence.
- **Survivor-Centered:** The survivor's safety, dignity, and informed consent guide the process at all times.
- **Impartiality and Objectivity:** Investigators must have no conflict of interest and must treat all parties fairly.
- **Due Process:** The alleged perpetrator has the right to be heard and to respond to allegations before a final decision is made.
- **Disability-Sensitive:** Investigators will make reasonable accommodations for survivors and witnesses with disabilities, including sign language interpretation, Braille materials, and accessible formats.
- **Timeliness:** Investigations begin immediately. Delays are documented and justified.
- **Criminal Referral:** Where allegations may constitute a criminal offence under Bangladesh law, BDDT will, with the informed consent of the survivor (unless legally required to act without consent), facilitate referral to Bangladesh law enforcement authorities.

12.3 Investigation Capacity



BDDT's PSEA Focal Person is trained to conduct preliminary assessments and manage investigations. For complex or sensitive cases, particularly where there is a conflict of interest or senior personnel are implicated, BDDT will:

- Appoint an independent external investigator or investigation team.
- Consult with BDDT's UN entity partner (e.g., UNICEF, UNFPA, UNOPS) and invite the UN entity to co-lead or conduct the investigation under the cooperative agreement.
- Apply to the OCHA Fund for Investigations into Sexual Exploitation, Abuse and Sexual Harassment where eligible.

At the conclusion of any investigation, BDDT will provide a complete and unredacted copy of the investigation report to the UN entity it works with, as required by the IP Protocol.

Supporting Documents for UN Assessment:

- Written Investigation SOP (Standard Operating Procedure) – maintained separately as an operational document
- PSEA Focal Person training certification
- SEAH Incident Reporting Form (Appendix E)
- Confidentiality agreement template for investigation participants
- Contact details of independent investigation consultants/service providers



Section 13: Core Standard 8 – Corrective Measures

CORE STANDARD 8: Corrective Measures

Assessment Criterion: The partner has taken appropriate corrective action in response to any SEA allegations.

13.1 BDDT's Corrective Measures Framework

Where SEAH allegations are substantiated following investigation, BDDT will take proportionate and effective corrective action. The following range of corrective measures may be applied, individually or in combination:

Corrective Measure		Applicability / Conditions
Formal written warning		Only for minor, first-time misconduct that does not constitute sexual abuse or exploitation, and where termination is not proportionate.
Mandatory remedial training and enhanced supervision		Required in all substantiated cases as a minimum response.
Formal apology to survivor		Only where the survivor provides free and informed consent and explicitly requests this.
Reassignment or restriction of duties		To roles without direct beneficiary contact, pending or following disciplinary action.
Suspension (with or without pay)		During investigation and/or following substantiated serious findings, per BDDT HR policy.
Termination of employment, contract or voluntary engagement		For substantiated cases of sexual exploitation or abuse, or repeated serious misconduct.
Referral to Bangladesh law enforcement		For alleged criminal offences (sexual assault, rape, child sexual abuse, etc.) under the Women and Children Repression Prevention Act 2000 and Bangladesh Penal Code. Facilitated with survivor's informed consent where possible; mandatory where legally required.
Mediated reconciliation / compensation agreement		Only with survivor's free, informed, and uncoerced consent; never in cases involving serious criminal offences.

13.2 Disclosure of Past Allegations

In compliance with UN Core Standard 8, BDDT will disclose any past SEAH allegations and evidence of corrective actions taken in response when required to do so by UN entity partners. Such disclosure will be



provided anonymously/without personal data of survivors, in compliance with Bangladesh data protection obligations.

BDDT's current status: No past SEAH allegations have been formally recorded against BDDT personnel. Upon any future allegation, BDDT commits to promptly notifying the relevant UN entity and following the corrective measures framework above.

13.3 False or Malicious Allegations

Unsubstantiated allegations made in good faith will not result in disciplinary action against the complainant. Allegations determined, after full investigation, to have been made maliciously with intent to harm will themselves be subject to disciplinary action.

Supporting Documents for UN Assessment:

- This PSEAH Policy (Section 13)
- BDDT HR Policy (disciplinary procedures)
- Declaration of no past SEAH allegations (or documentation of past cases and corrective actions if applicable)



Section 14: Monitoring, Data and Organizational Learning

14.1 Monitoring Framework

BDDT's PSEA Focal Person, under supervision of the Managing Trustee, will monitor PSEAH policy implementation using the following mechanisms:

What is Monitored	How	Frequency and Reporting
SEAH complaints and reports	Confidential case register (anonymized)	Monthly compilation; annual report to Board
Training compliance	Attendance records; training completion tracker	Quarterly; annual report to Board
Partner/subcontractor PSEA compliance	Partner assessments; monitoring visits; reports	At programme start and annually
Referral mechanism effectiveness	Follow-up with survivors (where consent given); service provider feedback	Per case and quarterly
Policy implementation	Internal self-assessment against 8 Core Standards	Annually

14.2 Data Protection

All SEAH-related data is strictly confidential. Monitoring reports use only anonymized, aggregated data. No personal identifiers of survivors, complainants, or alleged perpetrators are included in organizational reports or shared with third parties except where legally required or with explicit informed consent.



Section 15: Relationship with Other Policies

This PSEAH Policy should be read in conjunction with:

- BDDT Code of Conduct (approved November 2020)
- BDDT Safeguarding and Child Protection Policy
- BDDT Feminist and Gender Policy
- BDDT HR Policy and Procedures
- BDDT Financial Administration Policy
- BDDT's Constitution (Trusts Act 1882, Registration No. IV-22)
- Complaint and Feedback Mechanisms (internal and interagency)
- All MoUs and partnership agreements (which include the standard PSEA subcontracting clause)

In the event of any inconsistency between this PSEAH Policy and another BDDT policy, the stricter safeguarding standard shall apply, subject to Bangladesh national law. Where any provision conflicts with the laws of Bangladesh, national law prevails.



Section 16: Revision and Review

This policy shall be reviewed at least every three years, or sooner if required by changes in Bangladesh law, organizational structure, lessons learned from implementation, or updates to UN PSEA standards. Revisions shall be approved by the BDDT Board of Trustees and communicated to all relevant stakeholders, partners, and UN entity counterparts.



Appendix A: IASC Six Core Principles on PSEA

BDDT endorses and is fully committed to the Interagency Standing Committee (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse (sourced from the IASC Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel, 2006):

1. Sexual exploitation and abuse by humanitarian and development workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior, is prohibited. This includes the exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian/development workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of aid and development work.
5. Where a BDDT worker 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 through BDDT's established reporting mechanisms.
6. All BDDT workers are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.



Appendix B: UN PSEA Self-Assessment Checklist – 8 Core Standards

This checklist enables BDDT to self-assess compliance with the UN Harmonised PSEA Assessment Tool prior to submission to a UN entity. For each core standard, provide the required supporting documentation.

#	Core Standard	Minimum Requirement	BDDT Self-Rating	Supporting Document
1	Organisational Policy	UN-aligned definitions; explicit prohibition; mandatory reporting obligation	YES ✓	<i>This PSEAH Policy (Sections 3, 5, 6)</i>
2	Organisational Management (Subcontracting)	Standard PSEA clause in all subcontractor contracts/MoUs	YES ✓	<i>Sample contracts with PSEA clause; Section 7</i>
3	Human Resources Systems	PSEA self-declaration + reference checks for sexual misconduct + PSEA clause in all contracts	YES ✓	<i>Self-declaration form; reference check template; HR procedures; Section 8</i>
4	Mandatory Training	Policy requiring mandatory training; training covering UN-aligned SEA definition, prohibition, reporting and referral	YES ✓	<i>Training plan; attendance records; Section 9</i>
5	Reporting	Accessible reporting channels for personnel AND beneficiaries; active awareness-raising with beneficiaries	YES ✓	<i>Reporting channels (Section 10); PSEA awareness materials</i>
6	Assistance and Referrals	Commitment to survivor assistance; referral mechanism and procedure in place	YES ✓	<i>Referral Directory (Appendix F); referral SOP; GBV cluster membership</i>
7	Investigations	Written internal investigation procedure; internal or external investigation capacity	YES ✓	<i>Investigation SOP; PSEA Focal Person TOR; Section 12</i>
8	Corrective Measures	Disclosure of past allegations and corrective actions (if any)	N/A – No past SEAH allegations recorded	<i>Declaration of no past allegations; Section 13</i>



Appendix C: BDDT PSEAH Code of Conduct

I, _____ (Full Name), in my capacity as _____ (Position/Role) with Bangladesh Disabled Development Trust (BDDT), hereby commit to the following Code of Conduct on Protection against Sexual Exploitation, Abuse and Harassment (PSEAH):

I WILL:

- Treat all persons community members, beneficiaries, colleagues, and partners with dignity, respect, and fairness, regardless of gender, disability, age, religion, ethnicity, sexual orientation, or any other characteristic.
- Uphold the mission and values of BDDT and the UN-aligned zero-tolerance standard on sexual exploitation, abuse and harassment.
- Comply with all relevant Bangladesh laws, including the Women and Children Repression Prevention Act 2000, the Rights and Protection of Persons with Disabilities Act 2013, and the Bangladesh Penal Code provisions on sexual offences.
- Immediately report any concern, suspicion, or allegation of SEAH I become aware of, through the designated reporting channels, including where colleagues or senior officials are involved.
- Advise my supervisor if I am in a situation that could be misinterpreted as SEA or that could bring BDDT into disrepute.
- Maintain strict confidentiality regarding any SEAH allegation or investigation I become aware of.
- Cooperate fully and honestly with any PSEAH investigation process.
- Treat all survivors of SEAH with empathy, dignity, and respect for their confidentiality and informed consent.

I WILL NOT:

- Engage in any act of sexual exploitation, sexual abuse, or sexual harassment.
- Engage in any sexual activity with a child (any person under 18 years), regardless of local age of consent.
- Exchange money, employment, goods, or services for sexual favours.
- Request or require sexual favours in exchange for any assistance provided to beneficiaries.
- Engage in sexual activity with any beneficiary, programme participant, or resident of BDDT's accommodation facility.
- Use inappropriate, offensive, discriminatory, or sexually charged language.
- Engage in grooming behaviour, including developing inappropriate personal relationships with beneficiaries or their family members.
- Take photographs, film, or make audio recordings of beneficiaries, hostel residents, or community members without their express informed consent.
- Engage in, or condone, humiliating, belittling, or degrading treatment of any person.
- Marry or engage in romantic relationships with persons under 18 years of age (consistent with the Child Marriage Restraint Act 2017).
- Abuse my position of power or trust to take advantage of any person.
- Retaliate against any person who reports SEAH concerns in good faith.
- Allow concerns, suspicions, or allegations of SEAH to go unreported.



Appendix D: PSEAH Declaration Form – All BDDT Personnel

To be completed by all staff, board members, volunteers, interns, consultants, and contractors before commencement of engagement and annually thereafter.

I, the undersigned, confirm that:

7. I have read and fully understood BDDT's PSEAH Policy and the BDDT PSEAH Code of Conduct.
8. I agree to comply with the PSEAH Policy and Code of Conduct at all times, in and outside of the workplace.
9. I understand that a breach of the PSEAH Policy or Code of Conduct may result in disciplinary action up to and including immediate termination of my engagement with BDDT.
10. I understand that a breach may also result in referral to Bangladesh law enforcement authorities, and in criminal prosecution, administrative penalties, or other legal proceedings.
11. I declare that I have not been subject to any disciplinary, administrative, or criminal sanctions arising from an investigation relating to sexual exploitation or abuse, and have not left any previous employment while under investigation for SEA, and have not refused to cooperate in such an investigation.
12. I consent to BDDT conducting reference checks and background verification as part of my appointment or ongoing engagement.
13. I confirm my willingness to participate in all mandatory BDDT PSEAH training sessions.
14. I will raise through appropriate channels any matter which appears to breach the standards of this PSEAH Policy or Code of Conduct.

Full Name (Block Letters):

Position / Role:

Organization / Project: Bangladesh Disabled Development Trust (BDDT)

Employment Type: Staff Board Member Volunteer Intern Consultant Contractor

Signature:

Date:

Witnessed by (BDDT Staff):

This form is to be retained in the personnel file for the duration of engagement and a minimum of 7 years thereafter.



Appendix E: SEAH Incident Reporting Form

Submit to: PSEA Focal Person | Email: psea@bddt.org | Hotline: +88 01326893733

All information is strictly confidential. Anonymous reporting is accepted. You may submit this form in Bangla.

Field	Information (complete as much as possible)
Reporter Name (optional):	
Reporter (optional):	Contact Phone / Email:
Date of This Report:	
Date of Incident:	
Location of Incident:	District: _____ Upazila: _____ Specific location: _____
Type of Incident (tick all that apply):	<input type="checkbox"/> Sexual Exploitation <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> Grooming <input type="checkbox"/> Other SEAH
Brief Summary of Incident:	(Describe what happened in your own words – continue on a separate page if needed)
Alleged Perpetrator (if known):	Name/position/organization: _____ Relationship to survivor: _____
Survivor's (optional):	Information Age: ___ Gender: ___ Disability type (optional): ___ Is the survivor aware of this report: <input type="checkbox"/> Yes <input type="checkbox"/> No
Are there immediate safety concerns?	<input type="checkbox"/> Yes (describe): _____ <input type="checkbox"/> No
Assistance requested:	<input type="checkbox"/> Medical <input type="checkbox"/> Psychosocial <input type="checkbox"/> Legal <input type="checkbox"/> Safe shelter <input type="checkbox"/> None at this time <input type="checkbox"/> Other: _____
Has this been reported elsewhere?	<input type="checkbox"/> Yes – where: _____ <input type="checkbox"/> No
Reported by:	Name: ___ Position: ___ Signature: ___ Date: ___

IMPORTANT NOTE: All complaints are investigated with full confidentiality. BDDT has zero tolerance for SEAH and for retaliation against anyone who reports in good faith. If you are in immediate danger, call Bangladesh National Emergency Line: 999



Appendix F: BDDT Referral Directory – Bangladesh Support Services

This directory is maintained by the BDDT PSEA Focal Person and reviewed at least annually. Services are available in Dhaka and Barguna/Barisal Division unless otherwise noted.

Type of Service	Organization	Contact Information	Coverage
Medical Care / One-Stop Crisis Centre	Dhaka Medical College Hospital OCC	01715-961-826 (24hr)	Dhaka
Medical Care / One-Stop Crisis Centre	Barguna District Hospital	(0448) 62551	Barguna
Legal Aid	National Legal Aid Services Organization (NLASO)	16430 (helpline) nlaso.gov.bd	National
Legal Aid / Shelter	Bangladesh National Women Lawyers' Association (BNWLA)	02-9340240	National
GBV / PSEA Network	UNFPA Bangladesh GBV Cluster	unfpabangladesh.org	National
GBV / Women's Support	Ain o Salish Kendra (ASK)	02-58312082	National
Child Protection	UNICEF Bangladesh	02-5566-7777	National
Police / Reporting	Women and Child Help Desk – Dhaka Met. Police	01769-693010	Dhaka
Police / Reporting	Barguna Police Station	0448-62022	Barguna
Psychosocial Support	Kaan Pete Roi (Mental Health Helpline)	01779-554391	National
Safe Shelter	BDDT Accommodation	01326893733 (BDDT)	Dhaka (Mirpur-2)



Type of Service	Organization	Contact Information	Coverage
	Facility (for visually impaired women)		
Emergency	National Emergency Helpline	999	National
PSEA Safeguarding	BDDT PSEA Focal Person	psea@bddt.org md.monirinan@gmail.com Mob: 008801326893733	Dhaka & Barguna

Note: Contact details are subject to change. The PSEA Focal Person is responsible for verifying and updating this directory at least once per year and whenever services change.

Bangladesh Disabled Development Trust (BDDT)

House No. 20 (1st Floor, Flat 1/C), Barabagh, Mirpur-2, Dhaka – 1216, Bangladesh
 Phone: +88 01326893733 | PSEA: psea@bddt.org | info@bddt.org | www.bddt.org
 Barguna Field Office: Barguna Sadar, Barguna District, Bangladesh

===The End===

