

MUKTI FOUNDATION

# SAFEGUARD Policy



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## 1. Introduction

Mukti Foundation stands as a beacon of hope and progress in Bangladesh, dedicated to fostering the holistic development of marginalized communities and advocating for the rights and well-being of individuals with disabilities. With a steadfast commitment to this mission, our organization channels its efforts into multifaceted programs spanning health, education, and social inclusion initiatives.

Our initiatives target a diverse demographic, encompassing women, children, young adults, and individuals at risk, thereby ensuring that the most vulnerable segments of society receive the support they need to thrive. Through strategic partnerships and collaborations with various stakeholders, including governmental bodies, Mukti Foundation implements impactful projects that address critical societal needs.

Central to our operations is the implementation of a robust Safeguarding Policy, meticulously designed to uphold the highest standards of ethical conduct and ensure the safety and dignity of all individuals involved in our programs. This policy serves as a comprehensive framework, offering clear definitions and delineating standards that permeate every facet of our organization. It provides unequivocal guidance on the application and enforcement of safeguarding principles, both internally and in collaboration with partner organizations.

By adhering steadfastly to our Safeguarding Policy, Mukti Foundation demonstrates its unwavering commitment to accountability, integrity, and the protection of human rights. Through these concerted efforts, we strive to create a more inclusive and equitable society, where every individual has the opportunity to realize their full potential and lead a life of dignity and fulfillment.

## 2. Defining Safeguarding

Safeguarding encompasses the vital task of championing and defending the health, well-being, and fundamental human rights of individuals, ensuring they can lead lives free from harm, exploitation, and abuse. Embracing a safeguarding approach involves proactively identifying and mitigating risks posed to both children and adults by staff, representatives, and partners, as well as by our operational and program activities. Additionally, it mandates a prompt and appropriate response to any concerns regarding safeguarding within the communities where we operate. This holistic approach encompasses a



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wide spectrum of policies, procedures, and interventions aimed at safeguarding the safety and well-being of both children and adults.

For Mukti Foundation, safeguarding means taking decisive steps to minimize the potential for harm, exploitation, or abuse faced by children and adults within the scope of our operations and programs. This entails promptly reporting any safeguarding concerns regarding individuals within the communities we serve to the relevant authorities. Our safeguarding policy is designed to address these risks by establishing rigorous standards and implementing effective measures to mitigate and reduce residual risk.

In the wake of disturbing reports of sexual exploitation and abuse by aid workers in West Africa in the early 2000s, the United Nations Secretary-General issued a Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse in 2003. This directive has since been adopted by major humanitarian agencies and integrated into their policies and protocols. Furthermore, the "do no harm" principle has gained widespread recognition as a critical component in strengthening safeguarding systems, particularly at the national and local levels, when delivering essential services such as health care, education, and social protection.

Importantly, this policy acknowledges that individuals with disabilities, both children and adults, are particularly vulnerable to various forms of harm, exploitation, and abuse. Therefore, it underscores the necessity of adopting a comprehensive safeguarding approach that includes tailored actions aimed at addressing the specific risks faced by this demographic. By adopting such a twin-track approach, we can better protect the rights and well-being of all individuals, ensuring that no one is left behind or subjected to undue harm.

### 3. Statement of Commitment

At Mukti Foundation, we are unwaveringly committed to upholding the principles of safeguarding to ensure the protection, well-being, and dignity of all individuals, particularly those who are vulnerable or marginalized. Safeguarding is not merely a duty but a core value that permeates every aspect of our organization's operations and interactions.

We recognize that safeguarding entails promoting and defending the health, rights, and safety of individuals, empowering them to live free from harm, exploitation, and abuse. Our commitment extends



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beyond mere compliance; it is a moral imperative rooted in our dedication to fostering inclusive, equitable, and nurturing communities.

As such, we pledge to adopt a proactive safeguarding approach that encompasses rigorous risk assessment, robust policies, and effective interventions to mitigate potential harm. We are committed to fostering a culture of accountability, transparency, and continuous improvement, where safeguarding concerns are promptly addressed, and individuals feel empowered to speak up without fear of retribution.

Furthermore, we acknowledge the unique vulnerabilities faced by children and adults with disabilities and are dedicated to implementing tailored safeguarding measures to address their specific needs and challenges. We will work collaboratively with stakeholders, including staff, partners, and communities, to create safe environments where every individual is respected, protected, and empowered to thrive.

#### 4. Purposes

The primary aim of this policy is to establish a framework within Mukti Foundation that guarantees the execution of activities in an environment that prioritizes safety and protection. It endeavors to proactively prevent instances of harm, exploitation, and abuse to the greatest extent possible while also ensuring swift and effective responses when such situations arise.

To achieve these overarching objectives, the policy delineates three specific goals:

- **Keeping children and adults safe:** This objective underscores the paramount importance of safeguarding the well-being of individuals, irrespective of age or background. By implementing stringent measures and protocols, the policy seeks to create a secure environment where individuals are shielded from harm, exploitation, and abuse.
- **Safeguarding the reputation of Mukti Foundation:** Central to this objective is the preservation of the Foundation's reputation as a trusted and ethical organization. By maintaining transparent and accountable practices, the policy aims to shield Mukti Foundation and its representatives from unfounded allegations while operating within a clearly defined ethical framework.
- **Ensuring the highest standards of behavior from representatives:** This objective revolves around cultivating a culture of integrity and accountability among all representatives of Mukti Foundation. By setting and upholding stringent standards of conduct, the policy seeks to minimize the likelihood of individuals with malicious intent infiltrating the organization and

perpetrating harm. Additionally, it aims to promote a work environment where respectful and professional behavior is consistently upheld.

## 5. Scopes

The Safeguarding Policy will be implemented throughout all organizational endeavors and across Mukti Foundation's program areas, encompassing health, education, social inclusion, and research. All representatives of Mukti Foundation and partner organizations are required to familiarize themselves with and adhere to this policy. Representatives of Mukti Foundation include committees, permanent or temporary employees, consultants, volunteers directly engaged in Foundation activities, and donors traveling on Foundation business. In accordance with the policy, all representatives must endorse and be held accountable to Mukti Foundation's Safeguarding Codes of Conduct.

**Children and Adults with Disabilities:** Mukti Foundation has a specific mandate to protect and promote the rights of people with visual impairment and is increasingly involved in direct support to other people with disabilities. Recent research on child protection and disability has found that children with disabilities experience far higher levels of abuse than their peers. Girls and boys with different impairments are vulnerable to many forms of abuse but most at risk are children with intellectual impairment and communication difficulties. Emotional and sexual abuse are mostly reported by girls with disabilities, but boys with disabilities are also targeted.

Negative cultural norms around disability contribute to putting people with disabilities at risk of violence and abuse, including factors such as stereotyping, prejudice, discrimination, isolation, difficulty in protecting oneself, or inadequately understanding and/or communicating that abuse has occurred. People with visual impairments are especially vulnerable as they are dependent on tactile guidance. They are also likely to be particularly vulnerable in care situations, where they require assistance with toileting, dressing, bathing, etc.

Mukti Foundation will work to make sure that the particular risks of harm, exploitation, or abuse facing people with disabilities will be properly assessed, addressed, and monitored within the local context where Mukti Foundation operates.

While acknowledging the primacy of national policy and legal frameworks, especially for government partners, it is understood that in instances where the national legal framework is deemed less robust



than Mukti Foundation's policy, there may be specific advocacy efforts at the national level to strengthen such frameworks, particularly concerning the protection of children and adults with disabilities.

## 6. Standards

**6.1 Awareness and Communication:**All Mukti Foundation representatives are aware of the policy and the organization communicates its approach to key stakeholders.

**6.1.1**Mukti Foundation representatives are responsible for complying with the policy and code of conduct, including following all reporting and response procedures outlined.

**6.1.2**Mukti Foundation representatives will be introduced to the policy and sign the code of conduct as part of their induction, contracting or ongoing management process.

**6.1.3**Mukti Foundation will communicate the policy through its website and directly to core stakeholders, to demonstrate its commitment and the importance of the policy.

**6.1.4**In particular, Mukti Foundation will communicate about and where available share research of safeguarding issues specifically in relation to those with disabilities.

**6.2 Working in Partnership to Safeguard Children and Adults:**All Mukti Foundation partners will have policies and procedures in place covering safeguarding.

**6.2.1**In case of any partnership, Mukti Foundation will only enter into an MoU or PFA with organizations that either have these in place, or are committed to developing them, based on Mukti Foundation' policy, as an integral part of the partnership and where specifically mentioned within the PFA. This will be assessed during the due diligence process.

**6.2.2**Where a partner's policies and procedures are less strong than Mukti Foundation, and where they do not address issues of those with disabilities specifically, consideration will be paid to advocating for and providing technical support to strengthening of the policy.

**6.2.3**Assessment of risks to children and adults is included as a specific part of the project development or inception phase of every project, using the approved toolkit.

**6.3 Putting the Policy into Context:**All Mukti Foundation offices apply and implement the policy.

**6.3.1**Each office location has a Safeguarding Focal Person (SFP) in place with clear responsibilities for coordinating the implementation of the policy as well as mapping the local/ external context (including legislation) for safeguarding.

**6.3.2**Each office has in place a safeguarding reference group which develops and reviews annually the office safeguarding plan based on this policy, outlines the members of the reference group,

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contact details for the SFP, any specific contextual adaptations to the policy (agreed with the Safeguarding officer) and any advocacy, training, and awareness plans.

**6.3.3**The plan will specifically include a communications plan including how it will be rolled out with partners, children, parents, communities.

**6.3.4**Each SFP will work with the Safeguarding officer (SO) and reference group to assess any contextual issues with the policy and develop office specific procedures if relevant. These will include guidance for Mukti Foundation representatives about appropriate official reporting procedures in the case of an incident.

**6.3.5**Office procedures will be reviewed each time the global and national policy is reviewed, instigated by the SO, or a specific incident occurs or the national legislative environment changes, instigated by the SFP.

**6.4 Putting the Policy into Practice (I):**Recruitment, selection, and training

**6.4.1** Mukti Foundation will ensure safeguarding is part of any relevant job description. This will include all positions reporting into the Director, as well as specific positions where employees will be expected to come into direct contact with children and/or adults at risk.

**6.4.2**Recruitment processes for these employees will include relevant questions on experience working with children and/or adults at risk, and additional references or background checks will be undertaken for posts identified as high risk.

**6.4.3**Mukti Foundation will provide necessary training and support to representatives to ensure effective implementation of the policy.

**6.4.4**Mukti Foundation will ensure that the SO and the SFP have the capacity and capability to fulfill their roles. We will do this through training, support and the revision of roles and responsibilities.

**6.5 Putting the Policy into Practice (II):**Program activities

**6.5.1**Specific program guidance will be developed for each thematic area: inclusive education; social inclusion and health, by the relevant person, working with the SO. This should be developed in consultation with children and adults or their representative organizations to ensure it is robust and responsive to actual needs.

**6.5.2**A safeguarding focused risk assessment will take place during every new project as part of the risk assessment process, during either the Project Design Process (PDP) or the induction phase, with a specific section on children and adults with disabilities in all cases.



**6.5.3**A risk assessment will also be conducted for any other activity directly involving adults at risk and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered.

**6.5.4**The risk assessment will include mitigating actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff.

**6.6 Putting the Policy into Practice (III):**Communication activities

**6.6.1**Mukti Foundation representatives will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared.

**6.6.2**Mukti Foundation will ensure that adults and children are represented in an appropriate way that does not victimize or sexualize them.

**6.6.3**Mukti Foundation will only collect data on individuals for a specific authorized purpose and it will only be used as intended. It will be stored in a way that complies with relevant legislation and our own data protection procedures.

**6.6.4**Any breaches to the security of personal data must be reported and acted on immediately.

**6.6.5**Mukti Foundation staff will not use Mukti Foundation equipment to view, share or access illegal or inappropriate material, including any that specifically includes children.

**6.7 Reporting and Responding to Child Safeguarding Incidents:**

**6.7.1**Mukti Foundation will ensure that reporting and incident management procedures to handle incidents of abuse are in place, communicated to staff and effectively used to enable an appropriate and swift investigation of any given case.

**6.7.2**All Mukti Foundation representatives must also follow appropriate and relevant national legislative and criminal reporting procedures as advised by the SFP.

## 7. Safeguarding Measures

Safeguarding measures at Mukti Foundation encompasses the following activities:

### 7.1 Staffing

Mukti Foundation will appoint a Safeguarding Manager (SM) at the international level and Safeguarding Focal Persons (SFPs) to cover all countries where the organization operates. These roles may be situated in global teams outside the respective countries, as deemed necessary. The responsibilities of the SM and SFPs will be integrated into the job descriptions of existing staff, with adjustments made to their workload to accommodate safeguarding activities. The selection of SFPs will involve discussions between




the most senior staff members in each country and the SM. In countries without a Mukti Foundation office, a staff member overseeing the local partner program will be assigned this role, excluding non-staff members. Contact details of the SFPs will be included in all country information documents provided to visitors.

The roles of the SM and SFPs encompass two main aspects, each with distinct levels of responsibility:

- Facilitating the organization's understanding and capacity to implement the safeguarding policy. This involves direct knowledge dissemination, information exchange, and accessing external expertise as needed.
- Serving as the primary reporting mechanism for any safeguarding concerns and utilizing insights gained from specific incidents to enhance policy and practices.

Mukti Foundation will allocate adequate time for the SM and SFPs to acquire the necessary skills and knowledge and to carry out the aforementioned activities. Line managers will acknowledge the priority of SFP roles in incident reporting and response, as well as the dual reporting line required for this domain.

## 7.2 Prevention

Mukti Foundation recognizes the importance of raising awareness and providing comprehensive training on safeguarding to prevent abuse, exploitation, and harassment. We invest in ongoing capacity-building initiatives for all staff, volunteers, and partners, covering topics such as identifying signs of abuse, understanding power dynamics, maintaining professional boundaries, and reporting procedures. By empowering individuals with the knowledge and skills to address safeguarding concerns effectively, we foster a safer environment for everyone involved in our programs.

Mukti Foundation establishes clear and robust policies and procedures governing conduct, reporting mechanisms, and response protocols for safeguarding concerns. These policies are communicated to all stakeholders and regularly reviewed and updated to ensure effectiveness and compliance with best practices and legal requirements. By providing clear guidance on expected behaviors and response procedures, we promote accountability, consistency, and transparency throughout the organization.

## 7.3 Risk Assessment

Mukti Foundation routinely performs risk assessments to detect and mitigate potential safeguarding hazards within our programs and operations. These assessments entail scrutinizing the unique contexts



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and intricacies of our endeavors, pinpointing vulnerabilities and areas of concern, and instituting measures to tackle them. Through proactive risk assessment and management, we aim to reduce the probability of harm and foster safer environments for all individuals engaged in our activities.

#### 7.4 Codes of Conduct

All Mukti Foundation representatives are required to understand their responsibility to keep adults at risk and children safe, and to sign and abide by the Mukti Foundation Code of Conduct (*Annex 1*), which lists acceptable and unacceptable behavior, primarily designed to safeguard others. It also serves to guard the name and reputation of Mukti Foundation and its representatives from false accusations. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

Adherence to this code is mandatory for all Mukti Foundation representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action. To give maximum protection to beneficiaries, the organization, and staff, the Code of Conduct is to be applied both within and outside of working hours.

#### 7.5 Reporting and Responses

Mukti Foundation will guarantee the establishment and efficient utilization of reporting and incident management protocols to address safeguarding issues promptly and appropriately, facilitating thorough investigations of each case. All representatives of Mukti Foundation will be thoroughly briefed on these reporting and incident management procedures. Any Mukti Foundation representative who suspects or has concerns regarding harm, exploitation, or abuse by an individual representing another organization must promptly report such suspicions or concerns to the Safeguarding Officer or assigned SFP.

**a. Reporting Mechanisms:** Mukti Foundation upholds accessible and confidential reporting systems for individuals to report safeguarding concerns promptly and fearlessly. These methods might involve specialized hotlines, email contacts, digital forms, or trained staff designated to handle such reports sensitively and efficiently. We guarantee that these reporting avenues are extensively disseminated to all parties involved and are easily reachable by individuals from diverse backgrounds and capabilities.

**b. Response Protocol:** Mukti Foundation has established a clearly outlined procedure for addressing safeguarding concerns promptly, with sensitivity, and in a thorough manner. This procedure encompasses the following stages:



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- i. Initial Response:* Upon receiving a safeguarding report, Mukti Foundation responds promptly and sensitively, acknowledging the concerns raised and providing immediate support to any individuals affected.
- ii. Investigation:* Mukti Foundation carries out comprehensive and unbiased inquiries into all safeguarding matters, ensuring transparency, confidentiality, and respect for the rights and welfare of everyone involved. These investigations may entail collecting evidence, interviewing relevant individuals, and seeking guidance from external professionals or authorities as necessary.
- iii. Support Services:* Mukti Foundation provides appropriate support services to victims/survivors of abuse, exploitation, or harassment, including access to medical care, counseling, legal assistance, and other forms of support. We prioritize the safety, well-being, and dignity of individuals affected by safeguarding concerns and ensure that they receive the care and assistance they need to recover and heal.
- iv. Disciplinary or Corrective Action:* Mukti Foundation promptly takes necessary disciplinary or corrective measures against individuals found to have committed misconduct or wrongdoing. Such actions may involve terminating employment or volunteer positions, suspending program activities, referring cases to law enforcement authorities, or implementing other suitable measures commensurate with the gravity of the offense.
- v. Learning and Improvement:* Mukti Foundation is committed to learning from safeguarding incidents and using them as opportunities for reflection, growth, and improvement. We conduct debriefings and reviews following safeguarding investigations to identify lessons learned, gaps in our policies and procedures, and opportunities for strengthening our safeguarding practices. We use this information to implement corrective actions, update our policies and training materials, and enhance our prevention and response mechanisms to prevent similar incidents in the future.
- vi. Documentation and Reporting:* Mukti Foundation maintains accurate and confidential records of all safeguarding reports, investigations, and actions taken in response to safeguarding concerns. We ensure compliance with relevant laws and regulations governing data protection, confidentiality, and reporting requirements, while also respecting the privacy and dignity of individuals involved.

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### 7.6 Confidentiality

All reports and the accompanying information will be treated with utmost confidentiality to safeguard the identities of the individuals involved, including the person providing the information and the accused party. This confidentiality measure will be implemented diligently and in full compliance with pertinent national laws and regulations. By upholding strict confidentiality standards, Mukti Foundation ensures the privacy and dignity of all parties concerned while adhering to legal requirements. This approach fosters an environment of trust and security, encouraging individuals to come forward with safeguarding concerns without fear of retaliation or breach of confidentiality.

### 8. Review of Policy

Mukti Foundation will integrate safeguarding measures into relevant core internal processes and tools such as program technical guidelines, partner assessments and agreements, training modules, program design, monitoring and accountability systems, and recruitment procedures.

Mukti Foundation will make sure that proper induction and training in safeguarding will be made available to all staff, permanent and temporary, consultants, and volunteers. The SO and SFPs will receive additional training in order to manage their responsibilities for rolling out, managing, and coordinating the safeguarding policy and procedures.

Where relevant, Mukti Foundation will support partner organizations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on children and adults with disabilities.

The policy will be monitored on a regular basis by the designated SO and the SFPs. An annual summary report, including all concerns received, will be submitted by the SO to senior management. Any findings requiring a change in policy will be discussed at the Council.

A full policy review should take place every three years, instigated, and led by the SO, to include a review of external changes to safeguarding standards that apply nationally and internationally.

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## Annex 1: Incident Management Procedures

Procedures to be followed in the case of an incident.

1. **Any representative of Mukti Foundation** who has a safeguarding concern must report it immediately to the designated SFP in the country where the incident occurred. If the representative cannot contact the SFP, the SO must be informed before other staff are informed.
2. **From the point when they are aware of the incident**, the SFP must submit a written report to the SO wherever possible within 24 hours or, if this isn't possible, to call, email, or text a summary report within this period, with a written report to follow as soon as possible. The SO should then inform the Head of Governance and Assurance (HGA). The HGA maintains a formal record of all such reported incidents, which must be summarized and reported, in the annual return made to the Charities Commission.
3. **The SO will assess** the severity of the incident and decide whether to invoke the global or national crisis response process. In all cases, Mukti Foundation's director will be informed of the incident and crisis response, with all relevant staff and governance level communication initiated. In all instances, the director will inform, as a minimum, one of the following EC: the Chairman, Vice Chairman, Treasurer, or Chairman of the Audit Committee.
4. **If the incident** is deemed not to require a crisis response the SO will communicate with the most senior member to initiate the group. This may involve adding members or members, including external members such as a lawyer.
5. **If all or part of the role of the country safeguarding reference group** is to be played by the global crisis response team, that team will include the SO and country staff as appropriate. The first meeting of the team will agree on the roles of the global and country teams, in accordance with the procedures and control documentation in Mukti Foundation's Crisis Management Protocol.
6. **Once constituted**, the group will determine the immediate steps to be taken including:
  - a) Reporting immediately, or as soon as possible after becoming aware, to relevant authority, local law enforcement agencies, or any other external body if the matter is of a criminal nature.
  - b) Referring the individual concerned to the relevant support services, or ensuring the partner organization directly in contact with the child or adult does so.

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- c) Monitoring and reporting on the progress of the investigation and providing information and guidance as appropriate,
- d) Supporting staff in any related legal procedures, such as giving of evidence.
- e) Liaising with the SO to determine if an internal investigation is required and if the matter is viewed as a breach of this policy, including whether disciplinary procedures should be invoked.
- f) After the investigation, the SO will compile a written report including all necessary information on the nature of the case, safeguarding concerns, investigation process, and any learning to inform policy, practice, programs, or country plans.

## **Annex 2: Codes of Conduct**

To be applied within and out of working hours

**By signing this document, I agree:**

- To comply with Mukti Foundation's Safeguarding Policy and this Code.
- To report any concerns or incidents in line with procedures set out in the policy.
- To raise awareness of the policy and Code of Conduct in my work environment.

**I will:**

- Be committed to playing my part in creating a culture of openness and mutual accountability in the workplace. This culture will enable all safeguarding concerns to be both raised and discussed. This will in turn ensure inappropriate and abusive behavior is challenged.
- Help create and/or uphold an environment that is safe, positive, and encouraging, where people are listened to and respected as individuals.
- Ensure the use of the 'Two Adult Rule'. This means, when interacting with at-risk adults and/or children in a work context, I will ensure that another adult is present or within reach at all times.
- Ensure physical contact is at all times appropriate and not an invasion of the individual's privacy.
- Use positive, non-violent methods to manage behavior.



- Respect an individual's dignity and their need to be safeguarded at all times when taking photographs, filming or writing reports.
- Ensure that when photographing, filming or interviewing children and adults, the guidelines within the policy are followed and that consent has been obtained, individuals are properly dressed and are not depicted in a way that is abusive, sexually provocative, demeaning or culturally inappropriate or that characterizes them as being reliant on the viewer.
- Protect and handle personal data of others with care, to minimize the risks posed by third parties who receive information about children and adults from Mukti Foundation or its partner organizations.
- Respond to safeguarding concerns according to the reporting protocol.
- Comply with any investigation led by official bodies (including interviews) and make available any information necessary.

**I will never:**

- Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defense.
- Condone or in any way force an adult at risk, or a child, to participate in any form of sexual activity, real or simulated, on the internet or in any other medium.
- Make sexually suggestive comments or actions to a child, even as a joke.
- Touch, hold, kiss, or cuddle an adult at risk, or a child, in an inappropriate and/ or culturally insensitive way.
- Marry a person below the age of 18, regardless of consent or local custom.
- Help at-risk adults or children with acts of an intimate or private nature, which they can do for themselves. Such actions may only be undertaken for an individual who has acknowledged the need for that assistance directly, or through a parent/guardian.
- Engage in activities involving close body contact with at-risk adults and/or children, beyond professional requirements
- Hit or otherwise physically assault, or physically abuse anyone, nor use any form of corporal punishment as a disciplinary measure.

Signature

Signature

- Condone or participate in behavior with at-risk adults or children that is illegal, unsafe, or abusive, including being part of harmful traditional practices, spiritual, ritualistic, or substance abuse.
- Act in ways intended to shame, humiliate, belittle, or degrade others, or otherwise perpetrate any form of emotional abuse.
- Exploit adults or children for their labor (e.g. domestic servitude, street begging) or for sexual purposes, or participate in the trafficking of children. 'Child domestic servitude' does not include occasional house help, babysitting, kitchen gardening during school holidays, or general domestic tasks out of school time.
- Develop relationships with children or adults that could be deemed exploitative or abusive.
- Spend excessive time alone with an at-risk adult, or a child, away from others, behind closed doors, or in a secluded area (in line with the 'Two Adult Rule')
- Take an at-risk adult, or a child, who has been involved in our programs, to my home, or visit them in their home where I may be alone with them.
- Sleep in the same bed or the same room as an at-risk adult or a child met through work or allow them to stay overnight at my home.
- Take an at-risk adult or a child met through work alone in a vehicle unless it is absolutely necessary, and only with parental/guardian and managerial consent.

Location and date: .....

Signature: .....

### Annex 3: Incident Reporting Form

Safeguarding incident reporting form Send to Mukti Foundation's Safeguarding Officer. Attention, please treat this information **confidentially**.

This form is for reporting safeguarding concerns, including potential violations of Mukti Foundation's Safeguarding Policy and/or Code of Conduct. The information in this form is confidential. Please provide as much information as possible. Areas where you have nothing to report should be left blank.



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**1. Please indicate the nature of your concern (tick any that apply)**

1. a) Concerns that specific children or adults may have been harmed or are at risk of harm if no action is taken	Tick if relevant
You have evidence that an adult or child has been, or maybe at risk of, being harmed, abused, or exploited (e.g. eyewitness accounts of abuse, visible injuries, victim confided in someone)	
You are concerned about someone's behavior towards an adult or child (e.g. signs of aggression, obsession, or unhealthy interests have been observed)	
You are concerned for the safety or welfare of an adult or child. (e.g. signs or indicators of harm/abuse have been observed in the adult or child)	
How did this concern come to your attention? Please give details, including whether you observed it in person if someone else reported it to you, or if the victim told you directly.	

1.b) Concerns about general behavior, practices, or infrastructure, that could be putting people at risk	Tick if relevant
Concern about someone's general behavior (e.g. breaking a condition of the Code of Conduct)	
Concern about the infrastructure, protocols, or practices of a school, hospital, clinic, or other organization that could be putting people at risk (e.g. unclean/unsafe facilities, use of corporal punishment, lack of fire exits)	
How did this concern come to your attention? Please give details, including whether you observed it in person or if someone else reported it to you.	

**2. Information about you**

Name	
Position at Mukti Foundation (Or relationship to Mukti	

*Signature*

*Signature*

Foundation)	
Phone no	
Email	

### 3. Information about your concern

<p>Nature of concern/suspicion/incident</p> <p>Describe your concerns, what you have witnessed, or what has been reported to you. Give as many details as possible; take as much space as needed.</p>
Country where the incident or concern has arisen
If the concern is linked to a Mukti Foundation project, please give the project no/name
Date (or time period) of the incident or concern

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Is there a concern that specific individuals still are, or could be, at risk of harm? If yes, please provide details below.

#### 4. Observations and actions

Conversation report

If the concern was reported to you by someone else, or if you have spoken to any individuals who are directly affected, please describe here what he or she told you, and what you said.

Observations Such as injuries, the emotional state of the child or adult affected, or the physical state of facilities.

Cultural factors Please mention any specific cultural factors that need to be taken into consideration.



Action taken Have any measures been taken, for example, to improve the safety of facilities, and/or to protect any affected individuals? If so, please describe.

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Any additional measures not yet undertaken Do you feel that any other measures – in addition to those already undertaken – are necessary, to ensure people’s immediate safety? If so, please give details.

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What communication (if any) have you had with the suspected individual/organization (if relevant) regarding this concern?

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What communication (if any) have you had with the victim (if relevant) and/or any authorities/bodies regarding this incident?

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Your signature.....  
Date:.....

**Annex 4: Permission for Collection and Use of Content**

**Translate and/or read this statement:**



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*[Handwritten initials]*

Mukti Foundation uses stories of people affected by sight loss, disease, and/or disability to show why our support is needed. To do this, we request your permission to take photos and/or videos, interview you, and record your voice. If you give your permission, your content may be used:

- in external communications (including TV, fundraising, websites, social media, newspapers and magazines, radio, posters, exhibitions)
- by Mukti Foundation, our partners, donors, and supporters
- internationally and in-country
- to show the challenges you have faced, or how you have benefited from our support. If you give your permission, we will store your content securely for up to five years, after which it will be archived with restricted access. Occasionally it may be used for longer than five years.

You have the right to refuse. This will have no impact on the support you may receive from us.

#### Participant details

1. Name of participant: .....
2. Age ..... (children aged 7-18 must sign in addition to their parent/guardian):
3. Location: .....
4. If signing on behalf of a group/institution, your position: .....
5. If signing on behalf of a child under 18, or someone who cannot sign for themselves: Name of parent/guardian: .....
  - Relationship with participant: .....
6. Do agree for your full, real name to be used? (if no, please give details): Yes  No   
 If no, .....
7. Any other notes or special instructions  
 .....

#### Participant declaration

I sign to say I understand the information above and give my consent for my photo, video, story, and voice to be collected and used as described.

Participant (aged 7 or older) .....

Parent/guardian.....



Signature

Signature

Date.....

To help us match permission to photos, please write a description of the participant (e.g. describe clothing or other distinguishing features):

.....

### **Annex 5: Safer Recruitment Statement**

Mukti Foundation is committed to minimizing the risk of harm to children and adults at risk from staff, operations, and program activities. We will carefully select, train, and support all staff in line with our Safer Recruitment principles.

#### **This means we will:**

- Ensure that our recruitment and selection processes are inclusive, fair, consistent, and transparent.
- Take all reasonable steps to prevent those who might harm children or adults from working for us.
- Adhere to safer recruitment guidance and standards, responding positively to changing understandings of safer recruitment practice; and
- Always seek advice from the HR Operations Team to achieve the best possible practice in relation to recruitment.

#### **What is Safer Recruitment?**

Safer recruitment means considering safeguarding issues at every stage of the recruitment process. It is known that people who seek to harm others by using their professional or volunteer status will look for an organization or project with weak recruitment practices, where they can have access to at-risk adults or children.

#### **Mukti Foundation's safer recruitment guidelines mean that potential employees must:**

- Complete the specified application process for the role to which they have applied, indicating whether they know anyone who works for Mukti Foundation and if so their relationship to that person or persons.
- Where determined by HR, complete a self-disclosure form to disclose previous spent/unspent convictions and disciplinary or capability issues.



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*[Handwritten initials]*



- Undertake an interview to assess suitability and capability to carry out the role. Please note that interview panels consist of a minimum of two people with no prior connection to the interviewees. Interview records are retained for six months following the date of the interview and may be held longer for successful candidates who become employees.
- If offered a role, provide references covering the previous three-year period, accounting for any gaps in employment; and
- If offered employment, provide identity documents including photographic identity and evidence of their right to work in the respective country.

#### **Criminal records checks**

According to Bangladesh government guidance on disclosure and barring service (DBS) checks, the vast majority of roles at Mukti Foundation are ineligible for criminal record checks. Access to adults at risk and children is incidental to the work we carry out and is not part of any staff members' direct responsibilities. Our programs are developed and delivered with partner organizations, and it is our partners who provide services and work directly with beneficiaries. Our programs teamwork with partners to ensure they have good safeguarding policies and procedures in place, and where appropriate the Compliance Team will encourage criminal records checks be carried out by partners for eligible staff and volunteers. On the rare occasion that the Compliance Team has determined that a role at Mukti Foundation would qualify for a DBS check, this will be undertaken as part of the recruitment process, as agreed with the relevant HR Operations recruiter.

#### ***How do we reduce the risk of adults or children being harmed by Mukti Foundation staff?***

We believe that the best safeguard is a high standard of management practice and quality control consistently applied to employees at recruitment and selection and subsequently through induction, performance management and review, support & supervision, and monitoring.

#### **We do this through:**

- Ensuring all potential applicants are aware of our safeguarding commitments via the job advert pages on our website.

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*[Handwritten initials]*

- A clear recruitment and selection process which ensures employment checks and references are completed before an individual starts work and gaps in employment are questioned.
- Providing training and guidance to recruiting managers on all aspects of recruitment and safeguarding training to senior members of staff and Safeguarding Focal Persons (see Safeguarding Policy for more details)
- Our safeguarding policy which makes it clear that child abuse is unacceptable and will result in disciplinary measures and notification of relevant law enforcement agencies.
- Our Safeguarding Code of Conduct which clearly identifies acceptable and unacceptable behavior.
- A 'two adult rules' which means that no member of staff should ever be alone with an adult at risk or a child.
- Ensuring all staff read the Safeguarding Policy and sign the Safeguarding Code of Conduct as part of their induction.
- Reviewing staff performance throughout their employment with the organization including probation reviews in countries that operate a probation rule.
- Providing clear, accurate references for leavers reflecting conduct where appropriate.
- Having clear reporting and incident management procedures for safeguarding concerns, including concerns about staff members' behavior as detailed in the Safeguarding Policy; and
- Publicizing our Whistleblowing policy which protects employees, officers, consultants, contractors, volunteers, casual workers, and agency staff who raise a concern, and allows concerns to be reported in confidence.

*[Handwritten signature]*

*[Handwritten initials]*