



Uttaran

PSEA Policy

Community Mobilization

Poverty Eradication

Environmental Justice

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1. INTRODUCTION

Uttaran has been working to uphold the rights of extreme poor and marginalized communities of Bangladesh since 1985. The organization was formed with the aim to build a society free from all sorts of inequalities and where everyone has provided with their basic rights. Uttaran rights-based approach focuses on supporting disadvantaged and neglected communities in their struggle for human rights and justice, promoting citizens' rights and ensuring meaningful participation in development process. Uttaran concentrated on working for the social advancement of the rural poor focused on the landless especially women, outcastes and untouchables who are victims of socio-economic classification, hierarchic caste system and a male-dominated society. Uttaran promote an empowering process through the establishment of poor people's driven institutions and vertical networking to ensure the realization of potentials, develop alternative leadership, collective social action, self-help development initiatives, and create access to decision making.

Uttaran has an obligation to do no harm in line with our mandate and Code of Conduct that prohibits any act of and all forms of sexual exploitation and abuse (SEA).

Protection from Sexual Exploitation Abuse and Harassment (PSEAH) refers to the prevention of, and respond to, abuse of power by Uttaran staff, personnel, partners or associates against the vulnerable populations the organization serve. The Uttaran PSEAH Policy defines demonstrates the organization's ~~its~~ commitment to protecting vulnerable communities, employees, partners, and all individuals it works with from Sexual Exploitation, Abuse and Harassment (PSEAH).

This policy governs the organization, its personnel, partners to taking all necessary action to prevent, mitigate the risks of and respond to sexual misconduct and put the protection, rights, dignity of victims at the forefront.

Uttaran understands that people in power and in better position are more likely to compromise the safety of vulnerable people particularly, women, adolescent boys and girls, vulnerable adults and children, pregnant women, due to inequalities and vulnerabilities. Thus, Uttaran since inception has safeguarded its employees, volunteers, participants and partners prioritizing the concept of safety at all stages of the its programme. Uttaran always try to practice and ensure a work environment where sexual harassment, exploitation, abuse, child and adolescent abuse, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation are prevented and not tolerated at any cost. Uttaran has established other safeguarding mechanisms, like the selection and training of personnel, supervising and monitoring activities, reporting channels, investigation and punishment.

Uttaran consider everyone has the equal right to protection regardless of any personal characteristics including their age, gender, ability, culture, racial origin, religious belief and sexual identity.


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2. POLICY OBJECTIVE

- To establish a policy of zero tolerance for sexual exploitation, abuse and harassment (SEAH) for all Uttaran employees and related/associated personnel and ensure that roles, responsibilities and expected standards of conduct in relation to SEAH are known within Uttaran.
- To create and maintain a safe environment, free from SEAH, by taking appropriate measures for this purpose, internally and in the communities where Uttaran operates, through robust prevention and response work.
- To establish the foundational framework of Uttaran to prevent sexual exploitation and abuse and take corrective action when a sexual exploitation, abuse and harassment incident occurs.

3. TARGETED AUDIENCE:

This policy applies to all individuals working for Uttaran or on its behalf in any capacity, including employees and related personnel at all levels; board members; directors; staff; volunteers; interns; agents; contractors; external consultants; third-party representatives; suppliers; and business partners. The policy applies at all times, including during and outside of working hours, and is effective every day of the year.

4. POLICY STATEMENT

- 4.1 SEAH violates universally recognised international legal norms and standards and are unacceptable behaviors and prohibited conduct for all humanitarian workers, including Uttaran employees and related personnel.
- 4.2 Uttaran has a policy of zero tolerance towards SEAH. All Uttaran employees and related personnel are expected to uphold the highest standards of personal and professional conduct at all times, and to provide assistance and services in a manner that respects and fosters the rights of beneficiaries and other vulnerable members of the local communities.
- 4.3 Uttaran is fully committed to have an approach to prevent and respond to SEAH that is rights-based, age, disability-and gender sensitive, non-discriminatory and culturally appropriate, and victim-centric must when an SEAH allegation occur.

5. SCOPE OF APPLICATION

- 5.1 This policy sets out Uttaran approach to prevent and respond to SEAH. Employees and related personnel of Uttaran include, without being limited to: international and locally recruited staff members, daily labourers, consultants, interns, volunteers/ incentive workers, and contractors.
- 5.2 The policy also applies to all activities and operations of Uttaran including any project funded by Uttaran, any project implemented by the organization, and any cooperating partner.
- 5.3 The policy extends to situations of SEAH which occur at or away from the workplace, during or outside working hours, every day of the work. It applies to all personnel irrespective of the duration and type of their contractual arrangement.


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6. DEFINITIONS

For the purposes of the present policy:

- 6.1 The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- 6.2 The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 6.3 "Sexual Exploitation, Abuse and Harassment" (SEAH) is the abuse or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes or the actual or threatened physical intrusion of a sexual nature by Uttaran personnel, their implementing partners or other aid workers, against the people they serve.
- 6.4 "Zero tolerance" Uttaran follows a zero-tolerance policy to protect/prevent any form of sexual harassment.
- 6.5 Vulnerable person/people- for the purposes of this policy this is an umbrella term which covers children, young people and vulnerable adults including Person with disability (PWD), elderly, pregnant and lactating mothers, adolescent girls, mentally unstable, drug influenced.
- 6.6 Victim Centered Approach refers to as 'survivor centered' approach that aims to create a supportive environment in which each victim's rights, wishes and self-determination are respected and in which the person is treated with dignity and respect.
- 6.7 Protection covers measures to prevent, mitigate and respond to various forms of misconduct. It is the commitment of creating a safe and respectful work environment for all with maintaining zero tolerance policy.
- 6.8 Victim /Survivor are person who is or has been sexually exploited or abused or harassment. It also refers to an individual who claims that he/she has been sexually exploited or abused by others. The terms 'victim' and 'Survivor' use interchangeably in Uttaran PSEAH Policy to define a person who has had SEAH perpetrated against them.
- 6.9 Community based feedback mechanism is a system that enables affected people to provide feedback and raise concern about Uttaran programs and operations. It is a two-way communication system where Uttaran is accountable to those it serves and their voices are heard and incorporated into program design and implementation.
- 6.10 Related Personnel include for example sub-contractors, consultants, suppliers, partners, third-party representatives, interns or volunteers associated with or working on behalf of the Uttaran.
- 6.11 Perpetrator refers to a person who carries out a harmful, illegal, or immoral act.

7. COMMITMENT TO PSEAH

- 7.1 Uttaran will make every effort to create and maintain a safe environment, free from SEAH, and shall take appropriate measures for this purpose in the communities where it operates, through a robust PSEAH framework, including prevention and response measures.
- 7.2 This PSEAH framework, affirms Uttaran commitment to the UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and to achieving full, ongoing implementation of the IASC Six Core Principles relating to SEAH.


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8. SIX CORE PRINCIPLES

- 8.1 SEAH by Uttaran employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 8.2 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.
- 8.3 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 exchange of assistance that is due to beneficiaries.
- 8.4 Any sexual relationship between Uttaran employees or related personnel and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- 8.5 Where an Uttaran employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organisation or not, he or she must report such concerns via established reporting mechanisms.
- 8.6 All Uttaran employees and related personnel are obliged to create and maintain an environment which prevents SEAH and promotes the implementation of this policy. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

9. PSEAH FRAMEWORK

- 9.1 The below PSEAH framework shall be operationalised in a way that is adapted to the context, dynamics and organisational structure of Uttaran. The relevant measures shall be reflected, as necessary, in the relevant organisational policies and procedures.
- 9.2 As appropriate, Uttaran will consult with beneficiaries and local communities, including at-risk groups as identified by Uttaran, to ensure that the systems put in place and measures taken for the prevention and response to SEAH are sensitive to the vulnerabilities and needs of beneficiaries and culturally appropriate.

9.3 Integration of PSEAH into planning, programming and operational processes

- 9.3.1 Uttaran ensures that risks of sexual exploitation, abuse and harassment are properly assessed, addressed and monitored through integrating PSEAH into its planning, programming and operational processes i.e., strategic planning, budgeting, programme cycle management and allocates sufficient human and financial resources.
- 9.3.2 Uttaran conducts thorough and inclusive risk analysis and assessments on SEAH while designing projects and programme activities with mitigation measures, and identifies the groups that are the most marginalised and at heightened risk of SEAH. This include site safety mapping, distribution, focus group discussions with intended beneficiaries and other stakeholders including women, children, local authorities/communities and other relevant research methods.


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9.4 Recruitments

- 9.4.1 Uttaran has safe and PSEAH-sensitive human resources practices and processes in place during recruitment, contracting and performance management.
- 9.4.2 Job announcements: Uttaran explicitly states in a standard paragraph in its job announcements its zero-tolerance policy regarding SEAH.
- 9.4.3 Interviews: As part of the recruitment interviews, Uttaran asks questions related to ethics and SEAH.
- 9.4.4 Vetting: Uttaran systematically vets all prospective job candidates in accordance with established screening procedures, to ensure the organization does not hire potential employees that would pose a risk to staff and our beneficiaries.
- 9.4.5 Self-declaration: Uttaran asks selected applicants to sign self-declarations committing not to have committed SEAH in the past and not to commit SEAH in their new role within the organisation.
- 9.4.6 Employment contracts: Uttaran includes a SEAH clause in its employment contracts, clearly establishing the definitions and roles & responsibilities of staff regarding PSEAH. These include, but are not limited to, the duty to not commit SEAH, to report SEAH, and to cooperate in good faith with any investigation or audit related to a SEAH case conducted by the organisation.
- 9.4.7 PSEAH Focal Points: Uttaran provides designated PSEAH focal points with specific terms of reference related to their PSEAH roles and responsibilities.
- 9.4.8 HR processes: Uttaran aligns its HR processes with its PSEAH policy to describe the reporting and response mechanism for PSEAH allegations i.e., disciplinary measures for proven allegations.

9.5 Organisational management - Cooperation agreements

- 9.5.1 Uttaran includes a standard clause in all its contracts and partnership agreements with its suppliers, contractors, subcontractors and sub-partners requiring them to commit to a zero-tolerance policy on SEAH and to take measures to prevent and address SEAH.
- 9.5.2 Where suppliers, partners and contractors do not have appropriate policies and measures in place, Uttaran will support them in developing such policies and take such measures, as deemed relevant.
- 9.5.3 The failure of those entities or individuals to take preventive measures against SEAH, to investigate allegations thereof, or to take corrective action when SEAH has occurred, shall constitute grounds for termination of any cooperative arrangement.

9.6 Awareness of personnel, including mandatory trainings

- 9.6.1 Uttaran is committed to ensure that its personnel understand PSEAH, are aware of the PSEAH systems of the organisation, and are informed of their obligations as well as what actions to take in case of an allegation. In particular, personnel shall be informed of the following:

- A clear prohibition of SEAH;
- Definitions of SEAH and a clear understanding of behaviors that constitute SEAH;
- The obligation of all personnel to report any suspicions or concerns and


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- consequences for failing to report i.e., disciplinary measures;
- The option of reporting information anonymously;
- The organisation's protections for those who makes an allegation in good faith (e.g. whistleblower policy, protection plans for complainants);
- Details regarding who to report to and what information to share to allow for proper response and follow-up;
- Actions that personnel are required to take i.e. prompt reporting of allegations and referral of survivors;
- Explanation of how the organisation will use the information (e.g. who will receive the reports and the internal procedure for response and follow-up);

9.6.2 Uttaran holds mandatory induction within two months of the project signing/beginning and refresher trainings at least once in a year face to face, online orientation, training for all employees and related personnel on the Organisation's SEAH policy and procedures.

To do this:

- Uttaran develops an annual training plan for all staff, targeting different levels of audiences and participants.
- Uttaran keeps record of the attendance of all its personnel to induction and refresher trainings and the updating of the lists of participants.
- Uttaran has training materials on PSEAH, that are adapted to the type of training provided (induction or refresher) as well as the audience of the training, and ensure opportunities to exchange and discussions among personnel.

9.6.3 In addition to trainings, Uttaran takes measures both in writing and verbally to ensure that its employees and associated personnel are informed of their PSEAH related obligations as well as what actions to take in case of an allegation. This include without being limited to, posters, memo, reminder emails, quarterly integration in agenda meetings.

9.7 Reporting

9.7.1 Uttaran has set up safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report SEAH allegations that comply with core standards for reporting and ensures that beneficiaries are aware of these. The organization has mechanisms in place to restrict access to information and keep written reports safely for the security of the survivor and the complainant. Information about an allegation will be shared only on a 'need to know' basis.


9.7.2 Uttaran ensures that its reporting mechanisms meet the basic principles of effective reporting:

- Accessibility
- Responsiveness
- Safety
- Confidentiality
- Transparency

9.7.3 Available Reporting Channels: Reporting mechanisms are tailored to local context and accessibility. The following channels are available:

- Phone calls to designated focal persons


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- Toll-free numbers provided by donors (till now)
- Nearest Uttaran office
- In-person reporting to trained staff
- FCRM boxes placed in public areas (e.g., Union Parishads, distribution points)
- Text messages or emails to official addresses

All complaints are treated confidentially and handled according to Uttaran’s safeguarding procedures.

- 9.7.4 Notification: Uttaran provides training to staff likely to receive complaints on the relevant procedures and the alleged incident report.
- 9.7.5 Protection from retaliation: Uttaran is committed to uphold a culture of transparency and a safe environment where personnel and beneficiaries can report SEAH allegations as soon as possible without any adverse or punitive action being taken against them. The organisation does not tolerate any kind of retaliation, or threat thereof, against anyone who reports a situation of SEAH or cooperates in any investigation process related to a SEAH allegation. Uttaran has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report any consideration of retaliation against them.
- 9.7.6 The description of the available reporting mechanisms, mechanisms/procedures to review SEAH allegations and associated information sharing protocol are outlined CFRM Reporting Mechanism and Uttaran Awareness Raising Plan for PSEAH & Complaint & Feedback Mechanism.
- 9.7.7 Uttaran ensures that all allegations of Sexual Exploitation, Abuse and Harassment (SEAH) are received through safe, accessible, and confidential channels, including in-person reports, hotline numbers, complaint boxes, and email/SMS. Every complaint is assigned a Case Manager typically the PSEAH Focal Point who oversees the process, ensures timely referral to medical, psychosocial, and legal support, and maintains strict confidentiality throughout case handling. All SEAH complaints are managed under a survivor-centered approach, regardless of the affiliation or position of the alleged perpetrator.

9.8 Awareness-raising to beneficiaries and local communities

- 9.8.1 Uttaran is committed to ensure the awareness by its beneficiaries and local communities on PSEAH and its organisational PSEAH systems. For this purpose, Uttaran has visual communication materials for communities and “ready-to-use” awareness raising messages. These materials are:
- Adapted to local context;
 - Drafted in the relevant local languages;
 - Designed to be easily understood by and accessible to beneficiaries of Uttaran, especially those groups considered at higher risk of abuse.
- 9.8.2 Uttaran organises regular awareness-raising sessions in the communities in which activities are implemented, to provide information on:
- What PSEAH is
 - The standards of conduct that apply to the organisation’s personnel
 - How to make a report
 - The commitments from the organisation to response to SEA incidents


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9.8.3 Uttaran Awareness Raising Plan for PSEAH & Complaint & Feedback Mechanism also guides the actions.

9.9 Assistance to SEAH victims/survivors

9.9.1 Uttaran is committed to ensure that any victims of SEAH have access to assistance and support as soon as information about an allegation is received, regardless of (i) the Uttaran decision to investigate the case by the organisation, (ii) the outcome of the investigation and (iii) irrespective of whether the victim cooperates with an investigation or any other accountability procedure.

9.9.2 Assistance and support shall be provided by skilled and competent service providers in line with the “do no harm” and victim-centered approach, in full respect of the rights and best interests of victims and with respect to Gender-Based Violence key principles, especially informed consent. Services shall be rights-based, age, disability-and gender sensitive, non-discriminatory and culturally appropriate and ensure the best interest of the child. Support and assistance shall involve:

- a) Provision of safety measures to protect against retaliation, secondary victimisation and re-traumatisation,
- b) All SEAH complaints are addressed within 24 hours, with a preliminary investigation report submitted within 72 hours.
- c) Services including, without being limited to, referral to immediate medical and health care, dignity kits, mental health and psychosocial support, legal services, basic material assistance as a result of SEAH.
- d) In serious cases, Uttaran refers the matter to government legal aid services, ensuring survivors receive appropriate support. Information is disclosed only with the survivor’s informed consent and on a strict need-to-know basis, in compliance with donor and legal protocols.
- e) Uttaran maintains formal linkages with legal aid organizations and implements project-based agreements with psychosocial support service providers.
- f) In cases involving Sexual Exploitation, Abuse and Harassment (SEAH), the organization shall act in accordance with its Standard Operating Procedures (SOP), ensuring that survivors are referred based on need to appropriate psychosocial, medical, or legal support services. Where necessary, Uttaran will coordinate with law enforcement agencies to safeguard the survivor’s safety and wellbeing.

9.9.3 To do this, the organisation has:

- g) An up-to-date list of local service providers with options for child and adult survivors where appropriate, along with the types of services offered.
- h) A defined and articulated system and process described in its standard operating procedures (SOPs) on referrals and victim support as detailed in Uttaran Assistance & Referrals SOP. The SOP includes information-sharing protocols to respect the complainant privacy, confidentiality, safety and security.
- i) Referral forms

9.10 Investigations

9.10.1 Uttaran has a process for investigating SEA allegations in place and shall properly and promptly conduct the investigation of any SEA situation reported to it and committed by


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its employees or associated personnel or refer to the appropriate investigative body if the perpetrator is affiliated with another entity. The procedures for investigations management and process have detailed in an Uttaran SEAH complaints and Investigation Guideline.

- 9.10.2 Uttaran treats all reports and allegations with the greatest respect for the confidentiality. The organization always maintains confidentiality during the investigation process.
- 9.10.3 Investigations are conducted by a designated committee with legal representation and follow Uttaran's internal safeguarding framework and Uttaran SEAH complaints and Investigation Guideline.
- 9.10.4 Uttaran has a dedicated and trained investigative team. This team is responsible for investigating cases of abuse and all other violations. Investigation team/ investigator follows victim centered/survivor centered approach. Investigation team must follow any assistance provided to victim adheres to the principle of 'do no harm' and maintain confidentiality at every stage of investigation process.
- 9.10.5 Referral: If, after proper investigation, there is evidence to support allegations of SEA, these cases may be referred to legal authorities for any appropriate action, including criminal prosecution. Informed and voluntary consent of the victim shall be sought prior to any referral to legal/law enforcement authorities.
- 9.10.6 Corrective action: The person or team responsible for investigating SEA allegations has made recommendations for improvement so that Uttaran can reduce the recurring risk of any misconduct. The management of the organisation is in charge of reviewing and implementing these recommendations; such changes brought to the organisation's PSEAH systems will be communicated to the personnel as relevant.

10. PUNISHMENT

- 10.1 Uttaran is aware that proportionate punishment is essential for effective safeguarding.
- 10.2 Uttaran has invested deeply in the independence and the competence of the bodies and professionals that advise and decide about punishment. The dedicated body that decides about the punishment in cases of sexual harassment is completely independent and has outside members. The HR professionals that advise about the punishment in cases of other violations are highly competent and will not tolerate any interference.
- 10.3 Uttaran follows Personnel Management Guideline and Uttaran SEAH complaints and Investigation Guideline for disciplinary/post follow up action.

11. REVIEW OF SAFEGUARDING AND PSEAH POLICY AND PROCEDURE

- 11.1 The policy will be reviewed every three years or be updated as necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.


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