

**Asia Resilient Cities  
(ARC)**

**SUBAWARD NO. 30018-BRAC-01**

**USAID Cooperative Agreement Prime Award  
No.7200AA22CA00011**

**Activity Start Date and End Date: Jan 9, 2023 to April 30, 2027**

**Anti-Trafficking and Safeguarding Compliance Plan**

## **Introduction**

BRAC, one of the largest and most influential non-governmental development organizations in the world, operates with a transformative mission focused on alleviating poverty and empowering marginalized communities. Founded in Bangladesh, BRAC has expanded its reach and scope, implementing a diverse array of programs that address critical issues in education, health, climate change, economic development, and social justice. By focusing on holistic community empowerment and sustainable development practices, BRAC not only meets the immediate needs of those it serves but also cultivates an environment where communities can thrive independently. This commitment to sustainable change positions BRAC as a leader in the global development landscape, continually adapting and innovating to address the complexities of poverty and inequality.

BRAC prioritizes promoting gender equality, empowering women, addressing violence against women and children (VAWC), and mobilizing men and boys as central to its organizational commitments and interventions. In Bangladesh, BRAC has consistently taken a leadership role in addressing gender disparities, ensuring that women are at the heart of all its initiatives and prioritizes safeguarding as an essential commitment within its operations.

In response, BRAC is committed to enhancing its safeguarding compliance processes and integrating safeguarding measures across all organizational facets, including governance, human resources, partnerships, recruitment, program design, complaint mechanisms, and capacity development.

## **Purpose And Applicability**

The purpose of this Plan is to set out BRAC's policies and procedures for: (1) making BRAC employees aware of the conduct prohibited under BRAC policies related to the Anti-Trafficking and Safeguarding Provisions and the actions that may be taken against employees for violations (2) employing fair and safe recruitment, wage and housing practices (3) preventing prohibited trafficking and SEAH – Child Abuse & Neglect activity by suppliers, subcontractors and sub-recipients, and (4) monitoring, detecting and terminating those who engage in such activities, according to Mandatory Standard Provisions M15 and M25.

This plan outlines BRAC's baseline standards for anti-trafficking and safeguarding compliance, which generally apply to all U.S. Government contracts, subcontracts, cooperative agreements, awards, and sub-awards. Adjustments or modifications may be required for projects that are larger, more complex, or carry higher risks of trafficking and safeguarding concerns.

For contracts or awards with an estimated value of \$500,000 or more, or those involving activities outside the U.S., project staff must conduct a case-by-case risk assessment. This assessment considers factors such as the number of non-U.S. citizens to be employed and whether the project involves services or supplies vulnerable to trafficking or increased risks of exploitation.

## Project Summary

Developing secondary cities as inclusive, resilient and climate-positive development models can accelerate positive urbanization in the region, which can then be replicated in other cities. The Asia Resilient Cities (ARC) Project is a five-year cooperative agreement funded by the U.S. Agency for International Development (USAID) that will be supporting this type of development model. ARC is implemented by JSI Research & Training Institute, Inc. (JSI), with partners DevTech Systems, Inc., BRAC, and ICF. Over the course of five years, ARC will address cross-cutting urban development challenges in select cities in Asia by promoting sustainable urban growth; supporting resilient, low-carbon urban infrastructure; and integrating climate change and environmentally-conscious approaches.

## Project Overall Objectives

ARC's overall objectives:

- **Improve availability and quality of resilient infrastructure and services.** ARC will work with cities to identify gaps in municipal services (e.g., power, transportation, health, waste management, education) and then co-develop a workplan to improve the availability, quality, and resilience of those services to environmental disasters and shocks. The focus will be on the equity, accessibility, affordability, and responsiveness of those services.
- **Harness economic growth.** Economic growth leverages the economic power of all, including women, men, youth, and marginalized populations. ARC will support cities to create environments that support inclusive businesses, improve municipal revenue, and provide livelihood opportunities in green industries.
- **Improve capacity to address climate change and environment.** Climate change impacts all sectors of the urban environment. ARC will support cities to integrate climate change and environmental considerations in urban planning processes by providing training and data tools to increase capacity in this area.

## Definition of Trafficking in persons

According to the 'United Nations Convention Against Transnational Organized Crime and The Protocols Thereto'-

“Trafficking in persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons”

“Child” shall mean any person under eighteen years of age.

### **Employee Awareness Program**

BRAC has a series of institutional policies which provide a framework for our activities and are designed to ensure the protection of personnel and beneficiaries. This package addresses the Anti Trafficking and Safeguarding provisions prohibiting trafficking, sexual abuse and exploitation and child abuse-related activities, and describes the actions BRAC may take against employees and agents who violate the provisions, and sets out the reporting and investigating procedures for policy violations. This is the list of relevant BRAC policies:

Prevention from Sexual Harassment, Exploitation and Abuses (PSHEA) Policy  
BRAC Child and Adolescent Protection Policy and Procedure

BRAC Safeguarding Policy

BRAC Policy for Persons with Disability

BRAC Prevention of workplace bullying and violence Policy and Procedure

BRAC Whistleblowing Policy and Procedure

BRAC posts the Policies on its “My BRAC” portal where they can be accessed by all BRAC staffs.

All new personnel are required to read and acknowledge Policies at the time of hiring and must complete an on-line or in person mandatory training program.

### **BRAC’s Response regarding Safe Recruitment and Wage Plan**

BRAC is in alignment with the UN Convention against Transnational Organized Crime to prevent, suppress and punish Trafficking in Persons:

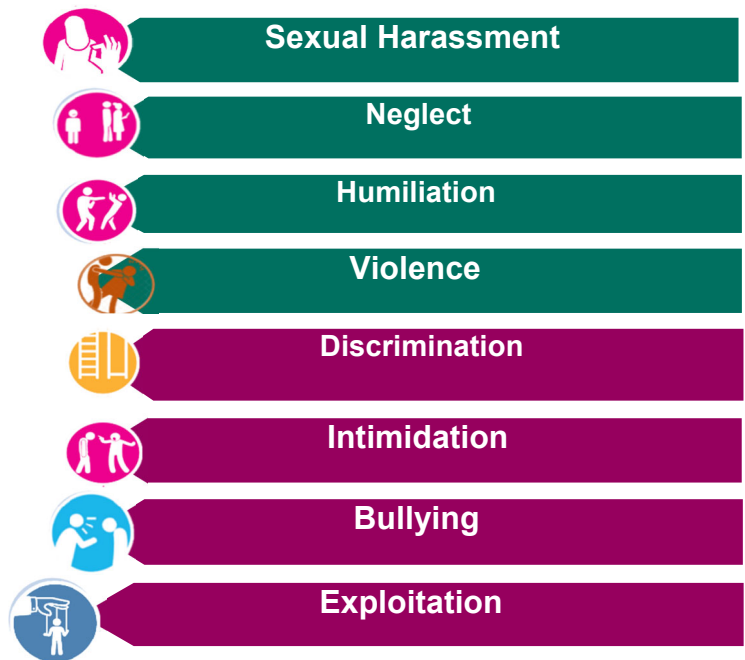
- Employees and associated personnel of BRAC must not engage in recruitment, transportation, transfer, or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
- BRAC stands strongly against requirement child labor and forced labor by any means to any activity.
- By no means, BRAC prohibits its employees and associated personnel of BRAC against trafficking.
- No recruitment fee is charged from employees during the recruitment process. Following are the steps for recruitment and selection process:
  - Job descriptions for all positions - refer to responsibilities for safeguarding and/ or the Code of Conduct and include the beliefs and values of the organization or link to them. BRAC transparently discloses in a format accessible to the employee all key conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided by BRAC), and, if applicable, the hazardous nature of the work.
  - Advertisement – to make clear the organization’s commitment to safeguarding.

- Shortlisting - to obtain and scrutinize information in applications/CVs - resolve any gaps, discrepancies or anomalies in employment history.
- Interviews - to include questions around safeguarding, the Code of Conduct and working with children, adolescents, adults with special needs and women.
- Self-disclosure - to the shortlisted candidates will sign a self-disclosure form stating that they have not been involved in any crime, illegal act, sexual harassment or child abuse case previously.
- Background/reference checks - to verify the successful applicant's identity, their employment history, and qualifications. Offers should not be confirmed until all checks have been completed
- External checks - to conducted according to organizational policy and country requirements where required, police verification should be conducted.

### BRAC's Principles

BRAC is committed to creating a safe and dignified environment for all its employees and stakeholders. Safeguarding refers to protecting everyone from any kind of abusive behavior or activities and ensuring a safe environment.

Protecting Individuals From any Kind of Misconduct or Harassment Including



To ensure Safeguarding BRAC has some policies in place. These policies include-

- Prevention from Sexual Harassment, Exploitation and Abuses (PSHEA)Policy
- Child and Adolescent Protection Policy & Procedure
- BRAC Policy for Persons with Disability
- Prevention of Workplace Bullying and violence Policy
- Whistleblowing Policy & Procedure
- BRAC Code of Conduct

BRAC also recognizes that some of its people are more at risks. It is with that in mind that BRAC recognizes six categories within its people that are more at risks than other and therefore needs extra efforts to protect them. These six categories are:

- Children
- Adolescent
- Person with Disabilities among the programme participants
- Person with Disabilities among employees
- Women among the programme participants
- Women among the employees

BRAC holds the following principles with regard to safeguarding as self-evident and as foundational for its practices:

Organizations have a safeguarding duty of care to participants, staff and volunteers, including where down-stream partners are part of delivery. This duty of care extends to people at risk of abuse within the communities the organizations serve.

Organizations have a duty to identify groups of people among employees and participants that are at greater risk of becoming victims of abuse. They have a duty to try to mitigate the extra risks those groups face.

Organizations have a duty to try to prevent abuse from occurring. They must make safeguarding a central element of the organizational culture. They must mitigate existing risks that may already exist in the programme design and specific work practices. They must establish secondary safeguarding mechanisms wherever risks cannot be mitigated through design.

Organizations have a duty to make sure that, if abuse does occur, victims and witnesses have access to multiple safe reporting channels. Organizations have a duty to always follow up on reports of abuse, to investigate them and to make sure that, if warranted, appropriate disciplinary action is taken. Organizations have a duty to protect whistle-blowers.

Organizations have, in principle, a duty whenever abuse crosses the line into criminal behavior to involve local authorities. However, the dangers in terms of lack of due process and disproportionate punishment should be taken into account.

Organizations have a duty to anchor safeguarding within management. Responsibilities with regard to safeguarding should extend to the highest levels of management and to the Boards. Those responsibilities should be clearly assigned. Organizations have a duty to make sure that the execution of safeguarding policies is carried out by competent professionals according to the highest standards and, whenever possible, following global best practices.

Everybody within an organization is responsible for safeguarding employees, participants and community members. Everybody should intervene to stop abuse whenever possible. Everybody should report abuse.

## Standards of Behavior

The following standards of behavior are the minimum requirements for all employees and associate personnel (which can include volunteers) to ensure safeguarding and to prevent abuse, that is, sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

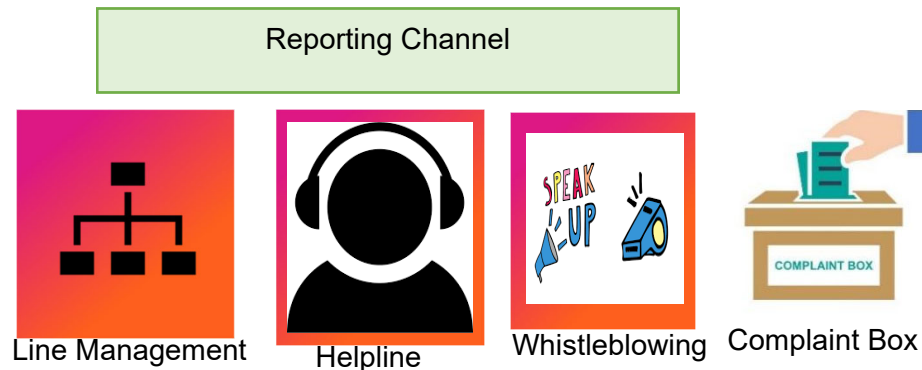
- Employees and associated personnel of BRAC must not –
  - threaten and/or physically assault anybody with/without weapon,
  - hit children and adolescents to discipline or correct them,
  - bully and/or humiliate anybody including children or adolescents to discipline or correct them and discriminate against anybody, for example, based on religion, gender, sexual orientation, race, skin color, age, ethnicity, caste
  - interact sexually with anybody without the other's willing consent, sexually harass or assault anybody,
  - have any sexual interaction with children/ adolescents/under the age of consent who are/aren't participants,
  - have any sexual interaction with women/men/Persons with Disability who are programme participants of the programme they are working with or
  - have any sexual interaction with anybody in exchange for money, goods or favors or based on any form of coercion.
  - take part in any criminal/terrorist/fraudulent group or activity defined by the Government law of the working country.
- Employees and associated personnel of BRAC must-
- Follow BRAC code of Conduct, Prevention from Sexual Harassment, Exploitation and Abuses (PSHEA)Policy, Child and adolescent Protection Policy, BRAC Policy for Persons with Disability.
  - Anticipate risk for fellow employees or participants of being abused that is being sexually harassed, intimidated or assaulted, bullied, discriminated or humiliated, neglected or exploited and take action to mitigate those risks.
  - Avoid being placed with children or with adolescents who are participants or under age or with Persons with Disability who are participants, in a compromising position. The adult is always considered responsible even if the child or adolescent or the person with disabilities initiated sexual interaction.
  - Stop immediately any abuse they witness (if possible)
  - Report any abuse they witness or have reliable information about.
  - Treat everyone with respect.
  - Respect everyone's privacy.

## Housing Plan

BRAC provides housing for its employees that complies with the rules and safety guidelines of the respective countries where it operates. This ensures that the housing meets local standards for living conditions and guarantees a safe and secure environment for employees.

## Reporting

BRAC has created a reporting system for abuse (and other violations) with several channels that complement each other. These channels are known throughout the programmes and enterprises. Regular campaigns ensure continued awareness. The project will maintain below mentioned reporting channels



The first channel is line management. Line managers within BRAC are aware that they have to intervene to stop abuse and that they have to report all cases upward through the line. Cases of suspected abuse reported up through the line are always followed up.

The second channel makes it possible to bypass management and reach the specialized investigative body directly. The channel operates both a dedicated 24/7 phone number and a dedicated email. Through this channel the identity of the complainant can be protected. In any case of harassment or abuse, the victim/survivor or as per the Whistleblowing policy, the colleague or witness or anyone can complain to the concerned supervisor or by calling on the 'BRAC HELPLINE NUMBER' or by email or by writing a letter. Besides that, if necessary, can report the complaint anonymously. BRAC Safeguarding Helpline Number and Email - 01729071546 & 0173034688 [complaint.shrc@brac.net](mailto:complaint.shrc@brac.net), [hrd.gmt@brac.net](mailto:hrd.gmt@brac.net). Cases of violations reported through this channel are always followed up.

The third channel is a whistle-blower channel. BRAC has made sure in the past that people that have reported abuse and other violations have not suffered any negative repercussions. They have on the contrary been made aware of the gratitude of the organization. BRAC will continue to protect complainants and whistle-blowers and make them feel appreciated.

BRAC has in cases where accusations proved to be false erred on the side of forgiveness. Only in cases where there was clear malice involved have people that made false accusations been punished.

BRAC is actively exploring ways to make the reporting channels even more accessible. Among other things, BRAC is contemplating creating the role of “person of trust” within programmes and enterprises. The main focus of its efforts is the accessibility of the system for participants.

These channels will be linked to BRAC’s central Safeguarding Management mechanism to resolve any critical issues that are beyond the capacity of the project team to handle and resolve.

## Disciplinary Actions



BRAC is aware that proportionate punishment is essential for effective safeguarding. Impunity will undermine the whole system. It contradicts the ethos and makes prevention a farce. Deterrence collapses. It makes witnesses vulnerable. It violates victims for a second time. Trust in the system drops. A disproportionately light sentence has almost the same negative effects. Equally, vindictive that is, disproportionately severe - punishments undermine the system. The punished has been unjustly treated. Colleagues are angered and often act in solidarity with the unfairly punished. Witnesses, sometimes even victims, feel guilty. The willingness of witnesses and victims to report abuse goes down, sometimes dramatically.

Because it knows how important proportionate punishment is, BRAC 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 disciplinary actions in cases of other violations are highly competent and will not tolerate any interference.

As a final mechanism, BRAC has created the Ombudsperson as a completely independent institution. Every employee that has been punished because of a violation can appeal to the Ombudsperson to review BRAC's decision in his/her case. The Ombudsperson will review the whole process, including the quality of the investigation and the proportionality of the disciplinary actions. The Contact information of Ombudsperson is as follows:

Office Address

BUET Housing Society

House B 1/5, Flat: E-2 (Lake Side), south Badda, Badda, Dhaka 1212, Bangladesh

Phone: +8802222282072; Email: [brac.ombudsperson@brac.net](mailto:brac.ombudsperson@brac.net)

## **Prevention**

BRAC is committed to proactive measures to prevent trafficking in persons across all its projects and operations. This includes implementing rigorous recruitment and hiring practices to ensure transparency and fairness, particularly in engaging non-U.S. citizens or vulnerable populations. Vendors and subcontractors are carefully vetted to confirm compliance with anti-trafficking policies, and contracts include explicit prohibitions against trafficking-related activities, such as forced labor or the use of fraudulent recruitment practices.

To prevent safeguarding issues, BRAC has established clear protocols to protect beneficiaries, especially vulnerable populations such as children and marginalized groups. All staff, contractors, and volunteers must adhere to a Code of Conduct that explicitly prohibits exploitation, abuse, or neglect. Projects are designed to minimize risks, including limiting unsupervised interactions with children and ensuring activities align with local laws and cultural norms. Safeguarding policies are reinforced through mandatory training and awareness campaigns, fostering a culture of accountability and vigilance. Reporting mechanisms are easily accessible and confidential, encouraging individuals to raise concerns without fear of retaliation. By embedding safeguarding practices into every aspect of its work, BRAC ensures the safety and dignity of all those it serves.