

Brac safeguarding policy

Introduction

Brac has for over forty years made the safety of the beneficiaries of its programs, the safety of the employees of its programs and the safety of the employees of its enterprises of paramount importance in the way it has conducted its (anti-poverty) work.

While the concept of safety itself has broader implications, safeguarding will in the context of this policy (and in line with current use in the humanitarian and the development field) be conceived as protecting against abuse, that is against sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

Brac has safeguarded its people (beneficiaries, employees) in the first place by making their safety a primary consideration already at the level of the design of programs and enterprises. The prevention of sexual harassment, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation is as far as possible built into the work practices themselves. If the design and its implementation cannot reduce risks sufficiently Brac has installed secondary safeguarding mechanisms, like selecting and training of personnel, supervising and monitoring activities, reporting channels, investigations and punishments.

In many cases Brac has sought to furthermore carry its safeguarding forward into the communities it serves. It has done so by example, through dialogue and by tailored programs.

This forty year long effort in safeguarding has been sustained because the fight against sexual harassment, intimidation, violence, bullying and discrimination, neglect and exploitation is part of Brac's mission. It is part of its mission in two ways. Brac sees that fight as one of its primary tasks closely connected to its core values of human dignity, integrity and inclusiveness. Brac also knows that if it guards the safety of its people and the communities it serves, its anti-poverty work will be more effective.

Brac has articulated that commitment to safeguarding at the level of its values, its code of conduct and its workplace instructions. It is a vital element of the induction of new employees. It is an important element of its human resource strategy.

The leadership of Brac has in those forty years consistently reinforced the importance of safeguarding and has led by example. Its boards have been vigilant, its management persistent.

Brac has with great worry taken notice of the recent integrity scandals in the humanitarian and development sector and the moral panic that has ensued. Brac mourns the suffering of victims and survivors, abhors the sexual harassment, the violence. Brac applauds the renewed vigor with which organisations within the sector have undertaken to safeguard the people they work with and serve. Brac understands that governments and donors ask for more assurances from organisations within the sector -including from Brac itself.

In the light of this crisis in the humanitarian and development sector Brac has undertaken to write up its forty year history of safeguarding practice in the form of a comprehensive safeguarding policy. In this policy Brac will bring together a handful of pledges that will guide its future efforts; safeguarding principles, standards of behavior, safeguarding practices, governance; the relevant sub-policies about the safeguarding of specific groups in specific programs and enterprises and descriptions of all safeguarding practices it has developed in the last forty years, describing both design solutions and secondary mechanisms. Brac acknowledges that it has in the past not done

enough to document the way it safeguards; it will rectify that in this policy, in its underlying documentation and in future studies and publications.

Pledges

1. The Brac organisation and the Brac leadership hereby pledges that the safeguarding of its people (employees, beneficiaries) and the people of the communities it serves, against abuse, that is against sexual harassment, bullying, discrimination, intimidation and violence, neglect and exploitation will continue to be a primary guiding principle for its anti-poverty work, for its programs and its enterprises.
2. The Brac organisation and the Brac leadership pledges that the commitment to safeguarding will continue to be articulated at the level of its values, code of conduct and work-instructions. It pledges that safeguarding will continue to be incorporated in the design of programs and enterprises. It pledges that where necessary secondary safeguarding mechanisms will continue to be installed and then maintained.
3. The Brac organisation and the Brac leadership pledges that it will analyze, describe and document the safeguarding work it has done and does. Of particular importance are the descriptions of the ways safeguarding risks have successfully been avoided in the design of programs and enterprises and the descriptions of secondary mechanisms that have tackled successfully specific remaining risks. Brac will make this research available to its partners and donors, but also to other organizations in the sector.
4. The Brac organisation and the Brac leadership pledges that it will continue to look for gaps and weaknesses in its safeguarding practices and address them wherever and whenever they are found. Brac envisions this as an ongoing effort. System-audits have, are and will be an important element of this constant improvement of safeguarding practices.
5. The Brac organisation and the Brac leadership pledges that it will continue to research, innovate and test new safeguarding solutions. It recognizes that because of the scale, the width and the interconnectedness of its programs and enterprises Brac occupies a unique position in the sector. It accepts the responsibility that goes along with that position. Brac aspires to help the sector to overcome its safeguarding deficiencies.

Scope

Brac is committed to safeguard all of its people. It wants to protect all of its employees, all of its beneficiaries against abuse, that is against sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

Brac also recognizes that some of its people are more at risk. It is with that in mind that Brac recognizes six different categories within its people that are more at risk than others and deserve therefore an extra effort to protect them. These six categories are: children, adolescents, adults with special needs and women among the beneficiaries and adults with special needs and women among the employees. Brac will not hesitate to add other general categories to this list in future if it concludes that that is warranted. Brac will also on the level of specific programs or activities offer extra protection to people outside of these categories whenever that is needed. For now these

six categories will structure Brac efforts: when it comes to analyzing, describing and documenting the safeguarding work Brac has been doing in the last forty years and is doing now, when it comes to the gathering and development and implementation of sub-policies, when it comes to designing programs and enterprises, when it comes to installing secondary mechanisms, when it comes to improving and innovating safeguarding practices.

Brac has been and will be safeguarding its people across all its programs and enterprises; financial services (ultra-poor, microfinance, bKash, bank), health (water and sanitation, pregnancy, birth, maternity, small children, rural health, tb and malaria control) education (preschool, play-labs, primary schools, secondary schools, professional skill training, life skill training for adolescents, scholarships, brac university) society (legal, gender, community, save migration), humanitarian (rohinga refugees) climate change (resilience) social enterprises (textiles, silk, insemination, milk, chicken, fisheries, cold storage, nurseries, packaging, paper, salt, seed, sanitary napkins.)

Brac acknowledges that its safeguarding responsibilities do not end at the boundaries of its programs and enterprises. It has been and will continue to look for a dialogue with partners, suppliers and client organisations about safeguarding. It will add conditions with regard to safeguarding to the contractual relations it enters into. It will react with severity if those conditions are not met or broken. Brac will also continue to reach out into the communities it serves and into the societies where it works to fight sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

All of the above means that this safeguarding policy is relevant for all cases within Brac where employees abuse other employees, where employees abuse beneficiaries, where beneficiaries abuse employees -and the cases where beneficiaries abuse beneficiaries within Brac's span of control or sphere of influence.

Safeguarding principles

Brac holds the following principles with regard to safeguarding as self evident and as foundational for its practices.

Organisations have a safeguarding duty of care to beneficiaries, 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 organisations serve.

Organisations have the duty to identify groups of people among employees and beneficiaries that are at greater risk of becoming the victims of abuse. The organisations have the duty to try and mitigate the extra risks those groups face.

Organisations have the duty to try and prevent that abuse occurs. They have to make safeguarding a central element of the organisational culture. They have to mitigate risks already at the level of the design of specific work practices. They have to install secondary safeguarding mechanisms wherever risks cannot be mitigated through design.

Organisations have the duty to make sure that if abuse does occur, victims and witnesses have access to multiple safe reporting channels. Organisations have the duty to always follow up on reports of abuse, to investigate them and to make sure that -if warranted- appropriate disciplinary punishment is doled out. Organisations have the duty to protect whistleblowers.

Organisations have in principle the 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.

Organisations have the duty to anchor safeguarding within management. Responsibilities with regard to safeguarding should reach up into its highest management and into its board. Those responsibilities should be clearly assigned. Organisations have the duty to make sure that the execution of safeguarding policies is done by competent professionals, according to the highest standards and whenever possible following global best practices.

Everybody within an organization is responsible for safeguarding employees, beneficiaries and community members. Everybody should intervene and 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) with regard to safeguarding, with regard to the prevention of abuse, that is sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

Employees and associated personnel of BRAC must not:

- Violate the Code of Conduct of Brac.
- Violate the Sexual Harassment Elimination (SHE) policy
- Violate the Child and Adolescent Protection policy
- Violate the Adults with Special Needs policy

They must not:

- Physically assault anybody
- Threaten anybody with physical assault
- Hit children and adolescents to discipline or correct them
- Assault anybody with a weapon
- Threaten anybody to assault them with a weapon

They must not:

- Bully anybody
- Humiliate anybody
- Humiliate children or adolescents to discipline or correct them
- Discriminate anybody, for example based on religion, gender, sexual orientation, race, color of their skin, age, ethnicity, caste.

They must not:

- interact sexually with anybody without the other's enthusiastic consent
- sexually harass or assault anybody
- enter into any sexual interaction with children
- enter into any sexual interaction with adolescents that are beneficiaries
- enter into any sexual interaction with adolescents under the age of consent
- enter into any sexual interaction with adults with special needs that are beneficiaries of the program they are working with
- enter into any sexual interaction with women (or men) that are beneficiaries of the program they are working with
- enter into any sexual interaction with fellow employees of Brac in exchange for money, goods or favors or based on any form of coercion

They must not :

- neglect children, adolescents and adults with special needs that are entrusted to their care
- exploit children, adolescents, adults with special needs or other beneficiaries or fellow employees in any form
- bring children, adolescents, adults with special needs or other beneficiaries or fellow employees into a situation where they can be abused or exploited by third parties

Employees and associated personnel of Brac must:

- Follow the Code of Conduct, the Sexual Harassment Elimination policy, the Child and Adolescent Protection policy, the Adults with special needs policy
- Anticipate risks for fellow employees or beneficiaries to be abused, that is to be sexually harassed, intimidated or assaulted, bullied, humiliated or discriminated, neglected or exploited - and act to mitigate those risks.
- Avoid being placed with children and with adolescents that are beneficiaries or under age, or with adults with special needs that are beneficiaries, in a compromising position. The adult is always considered responsible even if the child or adolescent or adult with special needs has taken the initiative or has acted in a seductive manner.
- Stop any abuse that they witness immediately if at all possible
- Report any abuse they witness or have reliable information about
- Treat everybody with respect
- Respect everybody's privacy

Safeguarding practices

Brac works on safeguarding along three axes; ethos, prevention, repression. Brac has been doing its safeguarding work within a framework of iterative learning: try, measure, try again if necessary.

Ethos

Brac is a southern anti-poverty organisation, based on human dignity, integrity and inclusiveness. Those values infuse all the work Brac and its employees are doing. It is at this level that the force and the weight of those forty years of experience have the greatest impact. These values are not just words on paper. They are the stories people tell about how working for Brac changed their lives. They are the pride that all people working for Brac feel. They are the exemplary lives and actions of specific persons within Brac -and the admiration others express about those. They are the design principles of programs and enterprises. They are the reasons for strategic decisions, for the existence of a program or enterprise, the reasons for picking a fight with a community, a society, a state, the reasons to shift resources, to walk the extra mile, to take a personal or organizational risk. Children and women are at the center of all of this.

In understanding the “Bracness of Brac” the first tenet one has to grasp is that this huge anti-poverty machine actually thinks of the children of people living in poverty as its main target. Brac understands that the lifting of people out of poverty is a multigenerational project. Here the values of Brac and the values of its adult beneficiaries align beautifully and strengthen each other. Both Brac and the adult beneficiaries invest and invest and invest again in the children, in the next generation, in the future. To say that Brac and the communities it serves together safeguard children is an understatement; they treasure them.

The second tenet one has to understand is that Brac from the beginning, resolutely, without ever wavering has chosen the side of women and their emancipation. That resulted in dedicated gender programs. That resulted in the priority given to the education of girls. That resulted in the absolute priority given to women and their economic agency in micro-finance. That resulted in a workforce where women are in the ascendancy; in numbers, in careers, in power. That resulted in the internalization of gender equality across men and women working for Brac. That resulted in an exceptionally strong internal system to prevent and punish gender discrimination and sexual harassment. The empowerment of women is for Brac not a secondary, additional aim, it is a *modus operandi* for all of its programs and enterprises.

Brac has articulated its vision, mission and values in a series of inspiring documents. It has in connection with those formulated a code of conduct that describes forbidden behavior with depth and detail. Safeguarding is an important element in all those documents. Brac uses those documents in the induction of all new employees. They are often present or referred to in other policy documents and in much of its internal and external communication. Even more importantly however is that they are translated to the level of the workforce and work processes. One finds for example the safeguarding of children articulated in a very precise way in the training manuals of teachers, or the safeguarding of women in the instructions around the loan payback process.

Going forward Brac will continue to update its vision, mission and value statements and its code of conduct regularly. It will continue to incorporate them into the induction and training of its employees and into the manuals and work instructions. It will continue to make sure that safeguarding is one of the constitutional concerns of its ethos and that that will be expressed at all levels. Brac is looking into the possibility of further strengthening its ethos by the introduction of a moral learning process into its organisations. If that turns out to be feasible Brac will share the resulting mores prudence within the sector.

Brac has always propagated and will continue to propagate as part of its values a culture of openness and accountability. It is especially important to continue to make clear to employees that loyalty to colleagues and loyalty to Brac should never be interpreted as giving a reason to hide violations. Being loyal within Brac means always finding a way to talk about, to report what has happened.

Prevention

Safe Design

Brac has and will continue to incorporate safeguarding into the design of programs and enterprises and their work processes. Brac sees this as the most important and the most effective way to protect its people and the high risk groups within them. This incorporation of safeguarding in the design is based on the deep (implicit and explicit) knowledge that Brac possesses about the specific risks for abuse connected to particular activities . As stated above Brac will make an effort in 2019 to describe the way existing designs safeguard high risks groups. Going forward Brac will explicitly highlight safeguarding of high risk groups within new designs wherever these are relevant.

Secondary safeguarding mechanisms

Brac has and will continue to install secondary safeguarding mechanisms to mitigate abuse risks for its people and the high risk groups within them. Some of those mechanism have a general character; they work across programs and enterprises. Others are very specific; they work within a singular program or activity. The ethos work mentioned above is of course the first general line of defense against abuse. Other general mechanisms are the attention payed to safeguarding in the recruitment and selection process and in the induction and training of employees; a regular practice of risk-analysis; line management responsibility and action; the deterrence achieved through the repression outlined further on.

Recruitment and Selection

BRAC has and will ensure it assesses the eligibility of candidates from a safeguarding perspective. BRAC has a Safe recruitment guideline which provides the steps which should be taken throughout the hiring process, from designing the job description to formal engagement of the employee, to minimize the risk of engaging someone who may pose an unacceptable risk to children, adolescents, adults with special needs and women. In summary, the following has and will be considered when planning recruitment:

- Job descriptions for all positions - make reference to responsibilities for safeguarding and/or the Code of Conduct and include the beliefs and values of the organisation or link to them.
- Advertisement - make clear the organisation's commitment to safeguarding.
- Shortlisting - obtain and scrutinize information in applications/CVs - resolve any gaps, discrepancies or anomalies in employment history.
- Interviews - include questions around safeguarding, the Code of Conduct and working with children, adolescents, adults with special needs and women.

- Self-disclosure- the shortlisted candidates will give their acknowledgement on 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 - verify the successful applicant's identity, their employment history, and qualifications. Offers should not be confirmed until all checks are in place.
- External checks - conducted according to organisational policy and country requirements—where required police verification should be conducted.

Education/training

Brac has and will continue to make safeguarding an important element of the education and training of staff. It will do that on the level of the induction of all employees and on the level of the training of professionals for specific functions.

- Every new hire will receive brief introduction on vision, mission and values of Brac, on the Code of Conduct and on the Safeguarding policy and duly acknowledge all of those as part of their induction.
- BRAC HR is committed to ensuring that aspects of safeguarding that are relevant within specific work processes are always part of the professional training of all staff; that where needed this training will be regularly repeated.
- Brac HR has and will continue to make sure that the professionals who will handle the cases & complaints have competencies in line with the highest standards and the best practices.
- Brac HR will regularly across the programs and enterprises organize campaigns to create awareness around safeguarding. The campaigns will be precisely targeted and tailored to ensure that they are relevant for the staff and beneficiaries in question. They will have a very varied character.

Risk-analysis

Brac will in future proactively if it knows risks of abuse (sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation) are present in a process and suspects that they are insufficiently mitigated, do an in depth analysis of process, risks, risk-enhancing factors. That analysis will be based on dossiers, observations and interviews. It will result in recommendations to redesign the work process and/or to add or change secondary safeguarding mechanisms. A risk-analysis as such will already have a deterring effect. The implementation of its recommendations will lower risk and raise mitigation structurally. The risk-analysis practice should be seen as the main element in the framework of iterative learning around safeguarding. From a long term perspective the practice has a cyclical character.

Line management and prevention

Within Brac line managers have direct responsibilities in preventing abuse. They have to make sure that safe designs are implemented, that secondary safeguarding mechanisms are maintained. They have to understand residual risks of abuse that are connected with processes and events and have to mitigate those where necessary and possible. They have to make sure that employees are familiar with the ethos of Brac, with the general and the relevant specific safe-

guarding policies. Line managers have a unique responsibility to stop abuse. They are the ones that are in the position and have the power to make sure that it ends. They therefore have the obligation to immediately intervene whenever they witness abuse or are alerted to it. Finally, line managers within Brac are responsible for creating the atmosphere of openness and accountability within their teams, that makes it possible for witnesses and victims to come forward.

It is a vital element of prevention that the highest management in a visible manner takes responsibility for safeguarding. That gives everybody in the organization the unmistakable message that all forms of abuse are unacceptable, that the organization takes the fight against them serious, that perpetrators will be punished, victims will be supported. Brac's highest management has always and will continue to embrace this responsibility.

Safe partnering

Even when BRAC is working with children, adolescents, adults with special needs and women through partner organisations (suppliers, vendors, downstream partners, consultants etc.) BRAC aims to safeguard them.

- Wherever BRAC is working with, funding, or supporting other partner organisations to work directly with children, adolescents, adults with special needs and women, the provisions of this policy and guidance should be reflected in the Partnerships arrangements.
- Reaching an agreement along these lines with partners should be envisaged as a dialogue. It will be done through discussion, negotiation, if necessary as part of advocacy and capacity building strategies.
- These partners should have their own safeguarding policy that broadly follows the provisions in this policy, or they should adopt the Brac policy.
- These partners should commit to implement the policy and to the safeguarding of children, adolescents, adults with special needs and women against abuse, that is against sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.
- BRAC should be assured that the practice and management arrangements of its partners reflect this common commitment to safeguarding.
- If a case of abuse within a partner organization comes to its attention, Brac will always act to make sure that the abuse is stopped and the case is followed up in an adequate manner.
- All partners should understand and be warned that Brac will not accept that cases of suspected abuse are not adequately followed up. Such a lack of adequate follow up could result in the end of the partnership.
- All partners should understand and be warned that Brac will not accept that safeguarding policies are lacking or are inadequately implemented and high risk groups are put at risk of abuse. Such a lack of policy or implementation could result in the end of the partnership.

Repression

A repressive apparatus consists of reporting channels, professional investigative units, bodies that advise and decide about punishment. Brac has created such an apparatus and will maintain it.

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 programs and enterprises. Regular campaigns make sure that this stays that way.

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 to 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. Cases of violations reported through this channel are always followed up.

The third channel is a whistleblower channel.

All channels are used regularly. That shows that they are known, accessible and trusted.

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 whistleblowers 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 investigating possibilities to make the reporting channels even more accessible. Among other things Brac is contemplating to create the role of "person of trust" within programs and enterprises. The main focus of its effort is the accessibility of the system for beneficiaries.

Investigation

Brac has created a dedicated investigative unit. That unit is responsible for investigating cases of abuse and all other violations.

The unit has successfully investigated many cases in the last decades. It is staffed with experienced professionals.

The unit conducts its investigations independently. The unit is committed to guaranteeing due process to all involved parties.

The unit has always followed up on reported cases. The unit has always documented the follow up and the investigations.

Brac has made sure that the investigative capacity both in terms of competency and in terms of amount of personnel has been adequate at all times. Brac will continue to do so in future.

Punishment

Brac is aware that proportionate punishment is essential to effective safeguarding. Impunity will undermine the whole system. It contradicts the ethos, makes the prevention a farce. Deterrence collapses. It makes witnesses vulnerable. It violates victims for a second time. The trust in the system drops. (A disproportionately light sentence has almost the same negative effects !) Vindictive, that is disproportionately severe punishments undermine the system as well. 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 advice about the punishment 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 his case there. The Ombudsperson will review the whole process: the quality of the investigation, the proportionality of the punishment.

Learning

Brac prides itself on being a learning organisation. The amazingly successful complex anti-poverty machine that is Brac-Bangladesh has itself come into existence through a ruthless process of iterative learning. Safe designs and the secondary safeguarding mechanisms that are already in place in programs and enterprises are themselves similar outcomes.

Brac pledged in this document to intensify the learning around safeguarding. It will do so in the following manner. It will analyze, describe and document the existing safe designs and the process specific secondary safeguarding mechanisms. It will regularly do system audits of the specific and the general secondary safeguarding mechanisms. It will in future build a capacity for risk-analysis as described above and use that to start up a regular cycle of improvement.

Most importantly, Brac will in a deliberate and targeted manner start up a series of experiments to try and solve some of the most vexing problems around safeguarding in the development and humanitarian sector. The list of experiments has still to be drawn up and finalized, but some strong candidates are the accessibility of reporting channels for beneficiaries, the re-articulation of masculinity in alignment with the fight against sexual harassment, supporting women and children in extreme circumstances in overcoming sexual and violent traumas, adapting instruments like system audits and risk-analysis to interpersonal violations, creating space for other sexual orientations within the culture of NGO'S.

Victims/survivors

Prevention is the best way to help victims -preventing that they become victims. That is why Brac has and will continue to invest in program (and enterprise) design that eliminates risks of abuse. That is why Brac has and will continue to invest in secondary mechanisms that diminish risks of abuse further. Brac acknowledges however that it will not be possible to completely banish all abuse. Because of this sad reality Brac has created and will continue to maintain the repressive apparatus around abuse that has been described above. Beyond and above that Brac is committed to helping victims/survivors in the best way it can. Brac is in other words committed to the idea of restorative justice. Through punishing the perpetrator in an act of retribution Brac reinstates the victim/survivor as a citizen and fellow human being that never should have been abused. Brac will also offer help to the victim/survivor to mitigate the physical and emotional damage that the abuse has inflicted. Finally Brac will in future facilitate mediation between victim/survivor and perpetrator -if and only if the victim/survivor expresses the will and wish to enter into such an interaction.

Governance

Brac has created reporting channels and dedicated units for investigation of suspected cases of abuse and for advising about punishment, as outlined above. The independence of the investigations and of the advice has been guaranteed. Brac has integrated safeguarding into project and enterprise design. It has successfully created an ethos that has the safety of children adolescents and adults with special needs and the empowerment of women at its heart. It has paid special attention to safeguarding in the in the recruiting, selection, induction and training of its employees. All of these efforts are lead from the top. The director of Brac international and the director of Brac Bangladesh have a direct responsibility for the safeguarding of employees and beneficiaries. They have appointed Chief People Officer (CPO) as management lead, who has an extensive Safeguarding Working Committee reporting to him. The boards of BRAC Bangladesh and BRAC International have a supervisory role. Issues with regard to safeguarding and integrity are discussed regularly. Most importantly, Sir Fazle Abed has taken the ultimate responsibility for supervising the safeguarding efforts of Brac upon himself. In doing so he has made explicit and formal what was already a reality for forty years. Sir Fazle Abed has made the safeguarding of employees and beneficiaries against abuse a foundational aim of Brac from its beginnings.