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## CHILD SAFEGUARDING POLICY

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## [Chapter 1] INTRODUCTION

### 1.1 About Praajak

New Alipore Praajak Development Society (hereafter referred as Praajak) is a voluntary organisation that collaborates with communities, government and non-government actors to provide an enabling and secure environment for vulnerable children and young people in West Bengal, India. Since its inception in 1997, Praajak has worked towards securing a better present and future for children and youth living in historically disadvantaged communities, in confined custodial milieus and those who find themselves surviving on their own.

Essentially, Praajak aims to address deep rooted, gendered social constructions and stereotypes that perpetuate inequities and deprivation. Our work, therefore, focuses largely on boys and men so that collectively we can address and, gradually, reconfigure patriarchal realities and notions that often restrain their potential. There has been a growing body of work with individuals across the gender and sexual orientation spectrum to work towards a gender equitable society. There is also a consistent, underlying emphasis on promoting children and young people's agency.

Praajak's work is consistent with the child rights framework. It works on child protection issues such as unsafe migration, child trafficking, child sexual abuse, early/ child marriages and forced marriages and child work and labour. It undertakes direct implementation, systems strengthening and technical support, networking and advocacy, research and documentation. The organisation prioritises processes of capacity building and participatory development.

#### **Our Vision**

*To create a gender-just and gender-equitable society where women and men work together to dismantle the oppression of patriarchal social structures and, thereby, ensure that human rights of all people are protected against stigmatisation and discrimination*

#### **Our Mission**

*To work with children and young people to challenge the existing social constructions of masculinity and provide workable alternatives which can empower boys and young men to become more socially responsible and contribute to the vision of a gender-just and equitable society*

Praajak believes that child protection is the responsibility of every adult who is involved with children. As an organisation committed to working with and for children, Praajak takes its responsibility for ensuring safety and well being of all children who come in contact with it very seriously. This includes ensuring that prevention of sexual abuse and exploitation (PSEA) and other forms of child abuse is consistently prioritised in organisational systems and operations.

In August 2019, the organisational Child Protection Policy was reviewed and updated with the endorsement of the Governing Body. This was largely done through a desk based review process and looking at related resources available in the public domain. The Policy was then renamed as Child Safeguarding Policy (*see box on next page for more*). During August – November 2020,

Praajak revisited the Policy in a more detailed and participatory manner. This included feedback and suggestions from staff and consultants as well as children, inputs from donor and network compliance processes, drawing from elements of global practice and final oversight of the Governing Body.

## 1.2 About the Child Safeguarding Policy

### Foundation of the Child Safeguarding Policy

Praajak's **core values** shape the Child Safeguarding Policy.

- Safeguarding children is 'everybody's business'.
- Children should always be treated with respect, regardless of their sex, ethnic or social origin, language, religious or other beliefs, ability, gender identity, sexual orientation or other status.
- All children have the right to freedom from all forms of violence, abuse and exploitation.
- All child abuse is an abuse of power and all violence towards children remains unacceptable and preventable.
- Although children may be resourceful and resilient, there is possibility of vulnerability in relation to abuse, given their typical lack of status and power, stage of development, and reliance on adults. Children are most at risk from people they know and often trust. Adults engaged in positions of trust towards children must therefore exercise the highest levels of integrity and good practice.
- All individuals and organisations working or in contact with children have an obligation to ensure that their operations are 'child safe'. This means that its personnel and others who engage with children through them do not represent a risk to children and that programmes are designed and implemented in ways that promote child safeguarding.
- All actions must always aim to promote the best interests of children at all times.

#### From Child Protection Policy to Child Safeguarding Policy – Why the Shift?

In many ways, Praajak's definition of child protection contained core elements popularised by the term 'child safeguarding'. This included emphasis on \*preventive actions to reduce risks of harm and abuse of children who came in contact with the organisation, \*promoting children's participation and \*co-creating an enabling environment for children, staff and other stakeholders.

However, it was felt that adopting the terminology of safeguarding would put these aspects upfront. It would also reiterate the importance of accountability for child safeguarding actions across all levels of Praajak and strengthening internal systems for preventive and responsive actions. It would also help promote an organisational culture where important strands such as actions against gender based and sexual harassment and prevention of bullying in any form are looked at comprehensively for internal and external stakeholders. Accordingly, the name of the Policy was changed from child protection to child safeguarding policy following a review in 2019.

## Meeting Ethical and Legal Obligations

The United Nations Convention on the Rights of the Child (UNCRC; wherein India is a signatory) upholds children's rights to survival, development, participation and protection. India's policy, legal and programmatic framework is aligned to this key instrument for the wellbeing of the country's children. Various policies and laws provide an understanding of the recognised risks and abuse that can affect children and the means for prevention and redressal. Praajak operates within this framework of the country. The Child Safeguarding Policy of Praajak (hereafter referred to as CSP or the Policy) will help Praajak create a child safe organisation where children feel secure, share, are listened to and where children and all personnel are respected and empowered. As mentioned earlier, this includes taking preventive actions as well as having systems in place for supporting any child affected by all forms of abuse including SEA.

## Purpose of the Child Safeguarding Policy

Praajak's Policy aims to:

- Create a safe environment for children who are in contact with Praajak
- Ensure that children's backgrounds or other characteristics are not used to discriminate against them in any form when accessing any initiatives of the organisation
- Ensure that institutional procedures prevent harm to children through adequate oversight of infrastructure, personnel, work style and other aspects of functioning (considering physical and psychological safety)
- Put in place and strengthen procedures for early identification/detection and reporting of risks and possible incidences of child abuse in any form (be it physical, sexual or in any other form)
- Put in place and strengthen procedures for investigations and taking corrective actions for all reported risks and possible incidences of child abuse; including interfacing with external agencies and service providers to provide support to affected child/children
- Ensuring that any child or adult who reports a possible violation of the Policy does not have to face adverse consequences for the same and receives support as necessary and feasible <sup>1</sup>
- Support children in becoming active agents in contributing to their own protection and well being

## Safeguarding Standards

Praajak holds itself accountable to the standards outlined below. It will evaluate progress based on these standards.

**Policy:** A written, comprehensive safeguarding policy that underlines commitment to prevent and respond to any safeguarding concern is in place. The consequences of violating the policy are clear.

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<sup>1</sup> Situations where an adult (particularly staff/consultant) is found to have made an allegation with bad/malafide intent will be considered as exceptions to this and may invite disciplinary action.

**Prevention:** There are safeguards in place for recruiting personnel that include assessing their suitability to work with children and young people. Reference and background checks are carried out.

**People:** All personnel, interns and researchers are trained, aware and informed of their particular responsibilities and expectations as per the policy. Community based organisations, partner organisations and any network with whom Praajak works are aligned to these standards. The standards are also applied to visitors, donors, vendors/service providers etc in the context of their interaction with children through Praajak.

**Procedures:** There are clear, well published reporting procedures in place that allow personnel, children and their families and other stakeholders to raise concerns, confidentially if necessary, about unacceptable behaviour or actual/ suspected abuse by staff, other stakeholders associated with the Praajak as well as other children. All concerns raised are taken seriously, responded to appropriately, recorded and followed upon.

### **Scope of the Child Safeguarding Policy**

The Policy is applicable to all at Praajak working either directly or indirectly with children. It also covers all individuals who may contact/engage children through Praajak. Thus, the Policy covers:

- Governing Body members
- Contractual staff employed including paid, full time or part time staff and those in probation period.
- Consultants engaged for specific assignments, both short term and long term
- Volunteers (including those categorised as associates i.e. assigned specific responsibilities and who receive allowances and general volunteers)
- Interns
- Researchers
- Donors
- Visitors
- Vendors/service providers
- Organisations that Praajak works closely with (non government organisations and community based organisations)
- Media
- Any other individual interacting with children through Praajak

[Note: Staffs, consultants and associates are collectively termed *Praajak personnel*. They hold greater responsibility and accountability for the implementation of the Policy.]

Praajak will also aim to encourage the collectives (at community level) that it works with to gradually become familiar and adhere to, at the least, the behaviour protocols (codes of conduct) included in this Policy.

## [Chapter 2] PREVENTION

### 2.1 Safeguarding Across the Project Management Cycle

Child safeguarding must be considered through the stages of project development, implementation, monitoring and evaluation. In other words, there has to be an emphasis on proactively identifying possible risks and other factors that can adversely impact children through all the stages of the development initiative. These risks and other constraining/adverse factors have to be addressed as early and as effectively as possible. This is essentially **Safe Programming**. It also includes identifying and utilising resources as well as promoting strengths of individuals and systems.

For instance, the proposal development stage may include needs assessment or other such exercises. These have to be designed to maximize children's participation in an age appropriate (and contextual) manner without compromising their safety in any way. Ethical aspects of consent and confidentiality have to be kept in mind. The confidentiality aspect can be revisited or negated only in cases where personnel come to know of potential danger and risk to child/children. However, this decision should be taken through reflection and with advice of line manager/other concerned staff in the organisation.

Children can face social backlash for their participation in efforts aimed at preventing child marriages or child labour. Speaking out against social norms and prejudices related to gender and sexual identities may also invite negative attention. Praajak will consistently aim to help children including identify immediate support systems in their families and communities. Its projects will explore gradual means of dialogue within families and communities to reduce discomfort and adverse reactions. It will also work with the children and young people to build their resilience and motivate them to articulate and stand by their beliefs.

There will also be an emphasis on including children's experiences, insights and recommendations through the monitoring and evaluation exercises. These exercises will aid a better understanding of the contexts, needs and protection issues of children which, in turn, can shape further programming.

#### Risks Assessment

Risk assessments involve identification of all possible factors and conditions that can cause harm to a child from participating in organisational activities. Establishing an understanding of potential risks is central to the work that is undertaken with children and their families. Measuring probability and level of risk help shape appropriate responses to these identified needs in a timely manner. It is also important to acknowledge that risks cannot necessarily be identified completely at any stage of an initiative or even eliminated completely, but they can be managed and reduced. In that sense, risk assessment matrices and check lists can be helpful in guiding understanding and action. Above all, personnel must exercise judgment in the management of risks, more so in situations that were not anticipated.

Risk assessment should be done in the proposal development/planning stage. This includes

- Identifying the themes/areas within which to identify risks
- Exploring these themes/areas drawing from available information and experience to identify specific risks
- Analysing the risks to understand their probability of occurrence and possible magnitude of impact on children
- Designing and implementing strategies to address the identified risks and assigning responsibilities for the same
- Tracking risk mitigation measures and maintaining updated records for future reference
- Detecting and managing new or emerging risks and related measures; include this on ongoing basis in the documentation
- Communicating the learning from the process within the team to reiterate its relevance and utility

The coordinators/team leaders have to ensure that risks assessments are done and that related action plans/mitigation measures are also in place. The dynamic nature of this aspect should be given due attention.

All personnel are individually responsible for ensuring that safeguarding risks are identified and acted upon in their areas of work. This includes cross checking for any possible direct or indirect risks related to SEA and other forms of abuse.

A format for risk assessment and mitigation is given in Annexure II. A checklist on minimum standards for spaces used for children's activities is given in Annexure III.

## **2.2 Enhancing Child Participation**

Basically, child participation involves children in the decisions that affect their lives in keeping with contexts, levels/evolving capacities. Child participation has very practical benefits in relation to child protection. The best way to protect children is to empower them to protect themselves. The following points should be kept in mind when engaging with children.

- Ensure child participation across the Project Cycle management including needs assessment and baseline surveys
- Track the profile of children who are participating in the activities. Check who is able to attend more and why as well as who is getting left out and the reasons for the same. Use these exercises to reflect and act on inclusion of children from disadvantaged backgrounds and those with disabilities. Also, critically consider if group/activity processes are perpetuating any form of discrimination and take immediate, corrective actions as needed. For instance, children who are gender variant (such as a boy who exhibits traits and behaviours considered to be feminine) may face comments and uncomfortable behaviours. Staffs should step in to prevent such behaviours within any group/activity process and also support the child (and his/her peers) to accept each individual's uniqueness and right to participation.
- Discuss children's rights with them, what is acceptable and unacceptable and what they can do if there is a problem. One way of empowering children to protect themselves is to ensure that they acquire specific information and skills related to child protection, so that they are

able to protect themselves in situations of risk. Such skills and information can include understanding what constitutes abuse (physical, emotional/psychological/mental, sexual and neglect), 'good touch' and 'bad touch'<sup>2</sup>, appropriate and inappropriate behaviours of adults with them/around them, and knowledge of and ability to use organisational reporting procedures.

- Talk to children about their contact with staffs, consultants and other stakeholders through Praajak and encourage them to raise any concern. Children should be made aware that there is someone they can talk to if they feel uncomfortable about anything.
- Work with children in ways that enhance their inherent capacities and capabilities and develop their potential.
- Children's participation should be informed, voluntary, and age-appropriate. In other words, they should know what they are being asked to do and they should not be forced to do anything they don't want to.
- Children should be made aware that they can stop participating in an activity or discussion at any point.
- Make sure that there are opportunities for children to ask questions and raise concerns

## 2.3 Safe Recruitment

Praajak acknowledges that creating safe environments for children starts with the appointment of suitably qualified, skilled and vetted personnel who work in an effective, efficient and safe manner. The recruitment process at Praajak aims to be in the best interests of children and reflects our commitment to protect children and prevent abuse. In addition to Praajak's standard recruitment process, the following child safeguarding measures are to be applied

**Recruitment / Contracting / Selection:** All staffs and consultant having direct or indirect contact with children have to face a thorough and standardised recruitment or interview process.

### For Contractual Staffs and Consultants

- Advertisements to highlight organisational emphasis on compliance with the Policy; job description and level of engagement with children outlined
- Questions on child protection issues relevant to the role during interview
- Enquiry into employment gaps, frequent changes of employment or reasons for leaving employment (if sudden)
- Original evidence of qualification to be produced by candidates during the interview process
- Candidates will also be required to submit names of two references who will be contacted through email and/or phone (to check about past work experience and suitability to be in contact with children)
- Praajak reserves the right to follow up with any previous employer on history of working with children

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<sup>2</sup> There is also an associated body of work that uses the terminology of safe and unsafe touch.

All candidates will be required to undergo relevant vetting processes (which may include background checks undertaken with support of police). Selected candidates will sign a declaration (See Annexure IV) stating that there is no reason to render them unsuitable for the post and information about any criminal convictions or ongoing criminal prosecutions against them. Staffs and consultants who have past criminal convictions or ongoing cases, particularly related to offences against children and women or violence in any form, will not be considered for recruitment.

Successful candidates have to sign the declaration of commitment to the Policy (Annexure V). Further, staffs and consultants have to affirm that they will not employ children below 18 years of age in their homes as domestic helps.

The successful applicant will only be offered a position subject to; (a) suitable references (b) proof of qualification (c) relevant vetting/ clearance procedure and (d) positive proof of identification and good conduct.

#### **For Interns, Volunteers and Researchers**

- In case of interns, letter of reference from the institution/agency will be needed. The letter should provide details about the amount of time and possible areas of work that the person can do.
- In case of volunteers, they have to submit a statement of intent outlining their capacities/skills, how they think they can contribute and the possible time period of engagement.
- A clear outline of work will be prepared for the interns and volunteers through discussion. They are expected to abide by it. They will also have to agree to sharing a report on the work done.
- In case of researchers, they have to submit details of the proposed research including objectives, methodology as well as the tools to be used. The researchers will also have to submit note on how they will comply with ethical aspects such as confidentiality, informed consent and Do No Harm. Further, the researcher has to share the possible shape that the final document and related outputs may take and the audiences with whom it will be shared. The researchers should also submit the draft report to Praajak for feedback.
- Praajak may ask for references and undertake background/vetting processes, especially for those expected to be in contact with children.

Interns, associates and other levels volunteers and researchers will have to sign the declaration of commitment to Praajak's CSP.

Volunteers who are assigned to work as associates with greater responsibilities and allowances will have to undergo more stringent processes similar to staffs and consultants.

Praajak reserves the right to refuse requests for research, volunteer and internship that do not comply with ethical and safeguarding aspects or are opposed to the organisation's values and practice.

### **For Vendors, Suppliers, Contractors and Other Service Providers**

- Selection of vendors/suppliers, contractors and any other service provider will be done following standardised administration and account procedures. This includes quality checks and past records of work.
- All service providers have to give a statement regarding their compliance with laws related to child and adolescent labour and child abuse in any form (including SEA). The statement will also include their declaration of commitment to, at least, the code of conduct. (Format to be added)
- Service providers will be informed that violations of the Policy can lead to termination of contract and even legal action where so warranted.
- Further, the concerned staffs/consultants will note if there is possibility of the service providers coming in contact with children. Where this may happen, the concerned staffs/consultants will be present during the interaction. Children will not be allowed to engage with the suppliers/contractors/service providers unsupervised.

## **2.4 Capacity building of Personnel**

Praajak understands that for the policy to be well understood and effectively implemented, its personnel have to be clear, confident and competent in putting the policy into practice. Praajak, therefore, commits to the following.

### **Orientation on Child Protection Issues and CSP**

All new Praajak personnel will undergo at least half day orientation as part of the induction not later than a month of joining. This orientation will include overview of child rights, emphasis on child protection and understanding of various forms of abuse including SEA. The Child Safeguarding Policy will be covered including the preventive actions, code of conduct, reporting and responding protocols. The recruits will be encouraged to seek clarifications. This orientation will also help in planning further capacity building measures. Volunteers and interns who are expected to have extensive engagement with children will also be included in the orientation. Schedule, module, attendance records and other documentation of the orientation will be maintained.

### **Further Training and Spaces for Discussion**

- Findings from ongoing monitoring mechanisms will be collated and used to develop a training plan for the subsequent year. The Child Safeguarding Committee will share its recommendations regarding the same with the Director.
- Praajak will ensure further training is provided for Praajak personnel with specific responsibilities in engaging with children. Overall, themes such as understanding local contexts and their influence on children's development, existing child protection issues at locations, understanding various forms of abuse (including SEA), child protection/safeguarding mechanisms (organisational as well as outlined through policy,

programming and legislative framework in the country and West Bengal<sup>3</sup>) will be touched upon. Communication with children and ethical aspects (consent, confidentiality) will also be discussed. The Policy will be covered including the stress on the code of conduct, importance of risk identification and management as well as prompt reporting of any suspected violation of the Policy. These elements will be included in the induction and other training opportunities.

- The annual conference of Praajak will include a session on the Policy.
- Coordinators/managers will receive additional attention to help them strengthen the preventive, reporting and responding mechanisms under the Policy.
- Also, a half or full day refresher on the Policy will be held every year for the Praajak personnel. Discussions on child protection and the Policy will be incorporated within capacity building efforts under various ongoing projects wherever possible.
- Praajak will also support the personnel designated as Child Safeguarding Officer and the representative in the Child Safeguarding Committee to enhance their capacities for their role.
- There will be an emphasis on equipping the key personnel (such as coordinators/line managers) and others so that they can undertake orientation of visitors, donors, interns, volunteers and others on the Policy as needed.
- There will special focus on the personnel undertaking orientation of children on key aspects of the Policy. The personnel will be supported in planning these sessions/related activities with children's groups and elsewhere as needed. A preliminary orientation has to be done within five days of the formation of the group. Related discussions on the Policy have to be done at least once every three months. A specific module may be used here.
- Training plans/schedules, modules, attendance sheets and other documentation related to the capacity building initiatives will be maintained and available for future reference.

## **2.5 Internal and External Dissemination of the Policy**

### **Internal Dissemination**

- The policy document will be provided to all Praajak personnel in English and local language version (such as Bangla, Hindi and Nepali) as applicable. A brief document with key messages can be shared in the local language till the full document is available in translated version.
- Praajak will provide materials/resources that support understanding and implementation of the Policy. This can include posters, pamphlets, booklets etc.
- Praajak will also encourage sharing of experiences and examples of good practice in implementing the Policy across the Praajak.
- Staff/consultant designated as Child Safeguarding Officer will share updates and resources related to PSEA and other forms of abuse, child safeguarding and the Policy internally. He/she should share such updates once in six months. This can be done via email or online/virtual or in person meetings.

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<sup>3</sup> Including but not limited to National Policy for Children 2013, National Plan of Action for Children 2016, Revised Integrated Child Protection Scheme, The Juvenile Justice (Care and Protection of Children) Act 2015, The Protection of Children from Sexual Offences Act 2012, The Prohibition of Child Marriage Act 2006, The Child and Adolescent Labour (Prohibition and Regulation) Act 1986 etc.

- Praajak personnel will be encouraged to refer to the guidelines and formats provided in the Policy as per their need.
- Key messages and contact numbers of the Praajak personnel representatives in the Child Safeguarding Committee will be displayed at offices across locations.
- Praajak may publish updates from the implementation of the Policy in its annual report.

### **External Dissemination**

- The policy document will be uploaded on the website for easy access. Copies of the policy will be also made available and accessible to all stakeholders, both in hard copy and electronically. Local language versions will be shared so that the Policy is fully understood by all relevant parties, both within and external to Praajak
- The concerned coordinator/line manager has to develop a plan for **engagement with children on the Policy**. This plan should include key sections/messages to be shared, mode of sharing and activities and their frequency. Visually appealing and accessible materials should be used. Specific child friendly content can also be developed for the same. Children should be encouraged to ask questions. The discussions should highlight both adult responsibilities as well as their own role and responsibilities in securing their protection. The progress against the plan should also be recorded.
- Dissemination activities should also be planned with **parents/guardians** and **key local stakeholders**. The local stakeholders can include community leaders, women Self Help Groups and other community based organisations, school authorities and teachers, local self government representatives (Panchayati Raj Institutions and Urban Local Bodies) etc. Multisectoral government functionaries from frontlines to the district level can also be considered. The amount of information and mode of sharing has to be customised to the contexts and the nature of engagement. Essentially, the dissemination activities with local stakeholders should highlight the Policy as a means of accountability of actions for the organisation (particularly the preventive component). The reporting and responding mechanisms should also be outlined. The support needed from the parents/guardians and other stakeholders their roles and responsibilities in ensuring the safety and wellbeing of children collectively should also be affirmed.
- Records should be maintained for the dissemination efforts undertaken.

## **2.6 Working with Other Organisations**

Praajak works with a range of NGOs and community based organisations (CBOs) through collaborative initiatives. These may include close, in-depth engagement with the organisations. In the context of child safeguarding, it will undertake the following, particularly with organisations where it has/intends to form a working relationship:

- Check if the proposed organisation has a Child Safeguarding Policy and if not, that it agrees to comply with Praajak's Policy, or at least the Code of the Conduct
- Ensure all written agreements with the organisation include a section on child safeguarding outlining expectations from it and that any violation, including on SEA, will be taken seriously and can amount to suspension of ties and legal action as warranted
- Encourage the organisation to uphold an environment where children are listened to and respected as individuals and which is safe, positive and encouraging for them
- Stress that the organisation has to take due notice of any risks or concerns related to child protection and have a system in place for dealing with the same
- Provide resources on child safeguarding for reference, and where possible, support the organisation in developing its own Policy

## [Chapter 3] BEHAVIOUR PROTOCOLS

Praajak is committed to ensuring that the personnel apply high standards of behaviour towards children. Accordingly, the following protocols for behaviours (**also known as codes of conduct**) have been outlined. These cover acceptable and unacceptable behaviours for greater clarity. These protocols will ensure that all personnel understand and abide by them and help create a child friendly and safe environment in all that Praajak does. These protocols cover staffs, consultants as well as the range of stakeholders who may engage with children through Praajak. They are expected to sign the declaration of commitment to the Policy and these protocols in particular. The behaviour protocols for Praajak personnel are also to be displayed at officers/centres.

Please note the list of behaviours outlined here is not exhaustive. It is important for all to avoid actions and behaviour which may constitute poor practice and potentially abusive behaviour. Essentially, all adults who interact with children through Praajak are expected to not engage, encourage, neglect or support abuse under any circumstance.

Any conduct which is a violation of the behaviour protocols, harms children and puts Praajak's credibility at risk will be taken very seriously and invite prompt action (see Chapter 5 for more on this).

### 3.1 Appropriate Behaviours of Praajak Personnel with Children

#### Do's (Acceptable Behaviours)

- Respect each child.
- Recognise and address the child with her or his name and never use any derogatory name or nickname.
- Be empathetic. Accept each child as a unique individual with specific characteristics, needs and capabilities.
- Work with children with patience and understanding of their local contexts.
- Make a conscious effort to promote child participation and track that children are not getting excluded because of location, religion, caste, tribe, class, family background or other characteristics. Ensure involvement of children across gender and sexual identity spectrum and of children with disabilities.
- Encourage children to express their feelings and opinions and participate in decision making process which affect them. Their views should be valued and taken seriously.
- Appreciate their efforts since it would be rewarding and reinforcing for further development.
- Act on children's concerns and problems immediately.
- Always be cautious in communication with children. Maintain boundaries and do not encourage dependence.

- Wear clothes and accessories that are modest and acceptable to the communities where we work.
- Maintain appropriate physical distance with children. Physical proximity can only be allowed when demonstrating sports activities, rendering medical help or in any other such specific situation. These situations have to be cleared by the line manager/coordinator.
- Physical contact with children must be appropriate to the child's age and circumstances, which must be initiated by the child rather than the adult. However, in all such situations, exercise caution and judgment.
- Use mobiles, laptops/computers, cameras and other equipment with due care and caution when with or around children. Use of mobiles while taking sessions or other intense activities with children is discouraged.
- Work with children in a place within the view of others. Any separate, individual work with children, where necessary (such as counselling) should be undertaken only with prior permission of coordinator/line manager.
- Children will be given the choice of working with a male or female staff/volunteer where gender may be a consideration such as counseling, medical checkup etc. The need and preference of the child is to be valued, considered and necessary action to be taken.
- Ensure that a female staff/volunteer is present at the time of rescue, restoration and follow up for girls. Where any travel arrangements are being made for girls, female staffs/volunteers have to be present.
- Permission from line manager/coordinator and consent of children and parents or guardians is needed before taking information from children. This information can be in the form of text, photographs, illustrations, audio clippings, audio-visuals etc. Respect their decision to say no to such requests.
- Ensure that the interaction (i.e. the interview process for case studies or representation of children in other form) is undertaken in an accessible and child friendly manner. Ask questions in a way that the children can understand and respond. Allow them to give their own account without frequent interruptions and asking leading questions.
- Always present children, families and their circumstances in a respectful and balanced manner.
- Ensure pictures or representation in any other form of children who are at risk or have faced abuse do not show their faces, homes or other aspects that can be used to identify them. Their names and other identifying characteristics should not be used in the text as well.
- Always be aware and cautious of both offline and online conduct when with and around children.
- Ensure that communication with children via social media, where needed, is always appropriate and supportive.
- Text, pictures, audios, videos and any other representation of children and events/activities (taken after securing consent and meeting confidentiality concerns) are to be shared in the public domain only with the permission of the line

manager/coordinator. Such information is only to be posted in specified online and offline channels/media.

- Promptly report any risk or suspected violation of the Policy to the line manager/coordinator or the Child Safeguarding Officer
- Comply with requirements of any investigation or other procedures under the Policy as needed

### **Don'ts (Unacceptable Behaviours)**

- Address child in a humiliating or derogatory manner using any reference to his/her background or personal characteristics (such as on basis of colour, gender, race, class, religion, financial status, ability etc).
- Use language (including slang), make suggestions or offer advice that is inappropriate, offensive or abusive.
- Speak strongly to a child in the presence of peers when correcting him/her. The related unacceptable behaviours/actions should be explained in a calm manner.
- Touch children unnecessarily.
- Use corporal punishment.
- Do things for children of a personal nature, which they are capable of doing themselves such as washing, undressing, using the toilet etc.
- Stay the night at any child's home with whom you are working.
- Bring or invite any child with whom you are working to your home without prior written permission of the organisation and parent or guardian. This is to be allowed only in exceptional circumstances.
- Sleep in the same bed with a child with whom you are working. This can be allowed only in emergency situations and after prior consultation and permission of the concerned line manager/ project coordinator.
- Condone or participate in any behaviour with children that is illegal, unsafe or abusive.
- Act in ways that may be abusive or may place a child in risk of abuse.
- Behave in a manner which is inappropriate or sexually provocative.
- Develop a physical/sexual relationship with any child.
- Expose children to hazardous work in any form.
- Exploit children through child labour, sex work or domestic work in their homes or in any setting of work.
- Allow visitors, donors, interns and other stakeholders to give gifts directly to children. The nature and quantity of gifts should be discussed with the staff/consultants and then given in a manner that no child feels left out.
- Take pictures/represent children when they are inappropriately dressed (i.e. taking bath or changing clothes /undressed) or in sexually suggestive poses or that in any other way that will impact negatively on their dignity and privacy.
- Send friend's requests to children for facebook or other social media platforms (you may accept if a child sends a request)
- Post any message, picture, audio visual or any other material on a child's social media page that is inappropriate, sensitive, violent or abusive in any way.

- Take and share text, pictures, audio, videos etc of children on personal social media pages or on whatsapp. This can be allowed only in specific situations and with permission from line manager/coordinator.
- Store or share any information, visuals, audios and audio-video/films that are communally charged, explicit or exploitative in any way.
- Download music, movies or other multimedia content from suspicious/illicit websites on official equipment (computers, laptops, mobile phones).
- Capture, download, store or share any pornographic content.
- Share information with media personnel without clearance from line manager/coordinator (media includes print, audio-visual, online websites and blogs etc).

### **3.2 Appropriate Behaviours of Visitors, Interns and Donors with Children**

- Share purpose, duration and other details for any proposed interaction with children with the concerned staff at Praajak.
- Plan for the interaction has to be finalised in consultation with the specific team and with due attention to the availability and convenience of children, their families and local stakeholders as relevant.
- Understand the requirements/expectations under the Child Safeguarding Policy and sign declaration of commitment to the same before initiating the visit and interactions with children.
- Wear clothes and accessories that are modest and appropriate keeping in mind the local contexts. Ask for further information/inputs if one is uncertain.
- Interact with children only in the presence of relevant personnel who will facilitate as needed.
- Treat all children with respect and empathy, irrespective of their colour, gender, religion, caste, tribe, class, ability or any other characteristic.
- Do not use offensive or slang language with or around children. Speak to the children in a manner that they can understand and contribute.
- Do not use any derogatory or slang nicknames for children.
- Be encouraging. Never stigmatise or humiliate children.
- Physical contact with children is to be avoided. It may occur where initiated by the child. However, it must be appropriate to the child's age and circumstances and one must exercise caution and judgment.
- Children cannot be given any gifts directly. This should be discussed with the relevant personnel at Praajak and undertaken only as decided mutually.
- Never behave in a manner which is inappropriate or sexually provocative.
- Never develop a physical/sexual relationship with any child.

- A child/group of children cannot be taken to another location or for any form of outing without prior discussion and permission of the organisation and the concerned families/guardians. Further, staffs will be present at such occasions.
- Use mobiles, laptops/computers, cameras and other equipment with due care and caution when with or around children.
- Children and their families cannot be interviewed or have their photographs taken without prior discussion with the concerned staff. Relevant information and photographs can be taken from the organisation.
- Where a child's details need to be taken, prior clearance from concerned staff and consent of the child and parent/guardians will be needed. Such interactions have to be undertaken in the presence of a staff and in a child friendly manner. Children cannot forced or lured to give information about themselves.
- Due care and consideration has to be given to aspects such as confidentiality, more so for children who are in vulnerable situations or have faced abuse. Their names and address, other identifying characteristics and faces cannot be shown in any representation.
- Never sensationalise or manipulate text and images and emphasis.
- Text, pictures, audio and audio-visual materials featuring children cannot be posted on personal pages on social media (facebook etc) or on whatsapp. Such content can be shared only where it has been cleared by the higher authority in the organisation.
- The draft report/other output has to be shared and approved by the organisation before it can be placed in the public domain.
- Never share information gathered during placement or period of work at Praajak, particularly if the work involved close engagement with vulnerable children, to any other person/institution/media without prior knowledge of Praajak.
- Never encourage contact with children beyond the visit that can be considered inappropriate or abusive in any way.
- Do not share phone numbers or any other contact information with children. This can be allowed only in specific cases (such as helplines, contact information for support services) and where it has been discussed and cleared with the concerned staff prior to the visit.

The behaviour protocols may need to be customized for specific contexts. For instance, a simplified version with basic do's and don'ts may be helpful where there is a temporary arrangement for transporting children. In some cases, say – for interns/researchers who will have a more in depth engagement with children, norms expected for staff/consultants may apply to them. The concerned line manager has to ensure that the necessary information (i.e. about the policy including the code of conduct), related orientation and taking of declaration of commitment is done.

### **3.3 Appropriate Behaviour of Media (Print/Audio visual/Online/Others)**

- Respect all children and treat them with empathy.
- Respect the right of children, families and local stakeholders to say no to sharing of information and taking of photographs and representation in any other form.
- Seek inputs from the concerned staff regarding the background of the children and any other factors to be kept in mind when engaging with them. Share the draft/sample questions with the organisation prior to the visit.
- Ensure that the interaction is age appropriate and the children comprehend what is being asked of them. Allow children to give their own account without frequent interruptions and asking leading questions
- Children cannot be lured or forced to reveal any information.
- Keep in mind the confidentiality and Do No Harm aspects. Names, other identifying characteristics and faces of children who are vulnerable, have faced abusive situations or are involved in legal proceedings cannot be printed/published or placed in public domain in any way. This is an offence punishable by law.
- Present the information shared accurately and highlighting the specific contexts.
- Never sensationalise or manipulate text and images to present children in an inappropriate or undignified manner.
- Children cannot be photographed while they are taking bath or changing clothes /undressed
- Do not make any promises or give assurances to the children and the families that are unrealistic or cannot be fulfilled.
- Never behave in a manner which is inappropriate or sexually provocative.
- Never develop a physical/sexual relationship with any child.
- The report/ document/photographs/film that features children contacted through Praajak or the organisation's activities should be shared with the organization the draft prior to its publication/release.

The concerned line manager should share the code of conduct and obtain a signed declaration. It is also important to understand the contexts of the engagement with the media and see which aspects need to be highlighted more.

For the three preceding sections (3.1-3.3), please refer to the next chapter on communication and information technology guidelines as well.

### **3.4 Appropriate Behaviour of Children with Other Children**

Praajak will encourage children to come together in groups/collectives through its programming. Here, they will be supported in framing the norms or rules for their groups. This will also include helping the groups frame a code of conduct for themselves – i.e. how they will behave with each other and adults. Some sample acceptable and unacceptable behaviours are listed here for reference. The groups at each location will be encouraged to frame such rules for themselves. These can then be displayed at the centre/venue where they meet.

#### **Do's**

- Respect all children in the group.
- Help each other.
- Ensure that any important, personal information that is shared by a member stays within the group and is not discussed outside.
- Identify and share information about issues, services and opportunities within the group and also beyond with other children

#### **Don't**

- Speak in a humiliating way or make fun of other children in a way that can hurt them.
- Tease, bully or threaten another child
- Use slang or abusive language within the group
- Spread rumours about another children
- Take a photograph of another child without his/her consent.
- Hit or attack another child in any way
- Sexually abuse another child
- Force another child to give away his/her personal belongings

### **3.4 Appropriate Behaviour of Children with Adults**

The list given here is also indicative and for reference. Children should be encouraged to frame their own list.

#### **Do's**

- Respect all staff, volunteers, visitors and other who come to interact
- Say 'No' for any activity which makes one uncomfortable
- Share your concerns and issues with staffs and volunteers
- Share any information regarding any risk or possible instance of abuse of children with trusted staff or the Child Safeguarding Officer

## Don't

- Use slang words or abusive language with them
- Use any derogatory name or nicknames for staff, consultant, volunteers and others
- Behave in a manner which is inappropriate or makes them feel uncomfortable
- Do personal things for them such as carry their belongings, buy food or do cleaning related work in the office particularly cleaning toilets

## [Chapter 4] COMMUNICATION AND IT GUIDELINES

### 4.1 Communication Protocols

The public use of stories and images of children can pose potential protection-related risks to them. There can be concerns related to breaching privacy and confidentiality, re-traumatising children and causing further risks. It is therefore important to have the child's best interest at heart in all internal and external communication.

The key points to be kept in mind have been incorporated in the previous chapter on Behaviour Protocols. Some additional pointers are mentioned below.

- **Informed consent:** Children and parents/guardians should be informed about the purpose for taking the information and how it may be used/disseminated. They have the right to say no. Also, consent is given to Praajak as an organisation and not to any individual for personal use.
- **Do No Harm:** Praajak works extensively with children in deprived settings, those who are at risk of being abused or have faced abuse in their lives. It is particularly important to ensure that children's safety and wellbeing should not be compromised if one takes, records and disseminates information about them. Sometimes, children and/or their parents or guardians may provide consent. However, as a staff/consultant, one may be aware of possible dangers/risks of putting information related to the child in public domain. In such cases, and guided by the principle of Do No Harm, one should not use the information publicly.
- **Maintaining confidentiality:** Children should be assured of confidentiality when they share something with staffs/consultants/volunteers. This is an important aspect of trust building, and not just within the communication domain. Children should be informed about the ways in which what they have shared will be used (with their names/without their names). At the same time, the personnel should also state that the confidentiality aspect may have to be breached if the information learnt indicates a risk/threat to a child's safety and wellbeing. Further, information about children should be kept safely and accessed only by the minimum number of staff, consultants, volunteers and interns who need the same for their work. Confidentiality concerns are valid for both internal and external communication. As outlined in the previous chapter, the staff/consultants may have to

stress this aspect with visitors, donors, media and other stakeholders as needed.

- **Highlighting positives:** Stories and images of children should highlight strengths and resilience as much as possible rather than sensationalising their experiences.

## 4.2 Engaging with Media

The organisation may need to sensitise media persons who wish to interact with a child. Besides the background and project briefing, the Child Safeguarding Policy including the expected appropriate behaviours should be discussed with them. The legal aspects (particularly related to confidentiality) may need to be reaffirmed.

Staffs, consultants and volunteers who are coordinating with the media need to be mindful of the following:

- Understand the requirements of the media personnel in detail and consult with line manager/coordinator to see what can be done and what is not possible
- Never share any information about children directly on the phone without clearance from line manager/coordinator
- Always be aware of the confidentiality and do no harm aspects and brief the media personnel accordingly
- Ensure that staff/consultant is present when the media personnel interacts with the child
- Encourage media to use photographs and videos from the Praajak's stock/library. Where photographs/audio visuals/other forms or representation need to be undertaken, ensure that staff/consultant is present at the spot.
- Ask the media personnel to share the writing/footage after it has been published including probable time of telecast as applicable
- Immediately notify seniors in the organisation if there is any misrepresentation or violation of the Policy; proceed based on their inputs and instructions from the Child Safeguarding Committee
- Maintain records of the media coverage and share with line manager/coordinator and seniors in the organisation

## 4.3 Social Media and Information Technology

Key points have been incorporated in the previous chapter. Some additional points are provided here.

- Staffs, consultants and volunteers are personally responsible for the content that they share on social media/online/whatsapp. Thus, they have to exercise caution and be mindful of consent, confidentiality and securing permissions for placing any text, photographs, audios, audio-visuals or other forms of representation of children in the public domain.
- A disclaimer stating that 'my opinion is my own and not of the organisation I am connected with' must be added with any post made on social media or personal blogs for any information linked with Praajak

- Officially approved photographs can be distributed on personal social media sites after seeking clearance from line manager/coordinator or concerned contact person in Praajak.
- Staff, consultants, volunteers, interns and visitor are encouraged to 'like' and 'share' the photograph published in official website and social media site (like Facebook) of Praajak.
- Staff and consultants should practice judgement and caution when engaging with children online (through social media accounts). They need to be mindful of the implications of their words and online behaviours and ensure that these are never inappropriate, suggestive, sexually provocative or abusive in any way.
- Any online content uploaded by staff/consultants/volunteers/others who interacted with children through the organisation which breaches the safeguarding policy of Praajak will be taken seriously. Any staff/volunteer/consultant/intern/others who comes across such content should report it, preferably to the Child Safeguarding Officer. The matter will be considered by the Child Safeguarding Committee which will provide recommendations for further actions. Necessary steps will then be undertaken by the Director.
- The director and senior management should ensure that sufficient guidance is provided to staffs, consultants and volunteers about the appropriate use of technology – including internet, mobile phones and social media.
- It is also important to note that IT equipment provided for official purposes must be used with caution and judgment.
- Filters and blocking software should be installed to ensure that unsuitable/offensive sites cannot be downloaded on official equipment (computers/laptops). In general sites which promote the abuse of children or contain images and information which are harmful to children should be blocked.
- In the event that offensive material or unsolicited messages/chats are received by staffs/consultants/volunteers, these must be passed on to the Child Safeguarding Officer who, in consultation with other Committee members, reports this to concerned agencies/authorities .
- Staff, consultants and volunteers must also report to their line manager if any offensive material is received or accidentally downloaded.
- In the event that offensive material, such as child pornography, is received or accidentally downloaded and a report is made to law enforcement, the materials must not be sent with the referral. The transmission of images is considered a crime under international law. Guidance should be sought from the law enforcement agency as to how to arrange for images to be transferred appropriately
- While the privacy of staff is respected, this is not guaranteed. For example, privacy considerations will not be considered where there is a suspicion that official IT equipment had been used to access child pornography online.
- Access to websites detrimental to the reputation of Praajak (and in violation of the Child Safeguarding Policy) is strictly forbidden and can lead to disciplinary action up to dismissal. Any unintended access to harmful data should be immediately reported to line managers to avoid misunderstanding.

**Staffs and consultants can undertake online safety awareness activities with children.** They should be encouraged to understand the importance of safe online behaviours and the nature of content that they should and should not share via phone and internet. Sometimes older children may subject younger children to bullying and even sexual abuse through online means. These matters need to be dealt with sensitively. Children should be helped in identifying a trusted and responsible adult who they can turn to if they come across any content that is inappropriate or harmful or any person that they are suspicious of. Staffs, consultants and volunteers need to be appropriately equipped to guide the children.

Staffs, consultants and volunteers also need to model appropriate online behaviours in their engagement with children. This includes showing how to set boundaries (for instance: what kind of messages/texts and pictures are allowed and what is not allowed) with them as well.

## [Chapter 5] STRENGTHENING IMPLEMENTATION OF THE POLICY

### 5.1 General Guidelines for Enhancing Implementation of Child Safeguarding Policy

- The **Governing Body** will play an important oversight role related to the implementation of the Policy. Moreover, a Governing Body member will head the Child Safeguarding Committee. The Governing Body can undertake further interactions with staff and children, review documents etc as needed.
- The **Director** will ensure the robust implementation of the Policy with support of the Governing Body. He will ensure that Policy related capacity building and dissemination activities are undertaken. He will also see that child safeguarding issues are included in regular staff evaluations/appraisals. He will also, periodically, assess the functioning of the reporting and responding protocols. Further, he will encourage an organisational culture where risks are promptly identified and addressed as well as suspected violations dealt with promptly and due seriousness and care.
- **Child Safeguarding Committee and Child Safeguarding Officer** will be in place and supported in their functioning by the Director. Their roles will cover tracking awareness and implementation of other components of the Policy as well as leading response mechanisms for any reported violation (see next section for more).
- The **management staff/consultants and those leading teams** will promote familiarity with the Policy among their team members. They will encourage discussions on child protection and safeguarding, identification and actions on risks and prompt reporting of suspected violations. They will use all available platforms including project team/monitoring meetings. They will also track the dissemination activities related to the Policy with both internal and local, external stakeholders. They will provide support and engage with the designated Child Safeguarding Officer on all matters related to the Policy.

- As mentioned earlier, **child safeguarding must be considered at every stage of the project management cycle**. This includes providing space for inputs and feedback from children across the stages as well. Risk assessments should be undertaken and the findings used to design corrective/mitigation actions.
- **Children’s groups and other spaces/platforms for children’s participation** should receive special attention. There should be an emphasis on ensuring that children are not discriminated or excluded including those across gender and sexual identity spectrum and children with disabilities.
- **Personnel who work with children must be supervised on a regular basis and given the opportunity to participate in discussions** about safeguarding issues through trainings, meetings, informal discussions and other means. Wherever needed, additional guidance must be given to staff, volunteers, consultants, partners and other stakeholders to ensure that the intent of the Policy is realised.
- Further, other stakeholders who engage with children through Praajak are expected to adhere to the Policy. After all, child safeguarding is everybody’s business!
- The implementation of the Policy will be regularly **monitored** (see section 5.3) and **reviewed** (see Chapter 7). The experiences and lessons learnt should be utilised to enhance subsequent implementation of the Policy as well as deepen integration with ongoing programming.

## 5.2 Key Actors – Child Safeguarding Officer and Child Safeguarding Committee

### Child Safeguarding Officer

The Director, Praajak will designate a mid to senior level staff/consultant as the Child Safeguarding Officer. He/she will be the focal point for contact for all matters related to implementation of the Policy including PSEA within the organisation. He/she will also serve as a key reference for matters related to child protection within the organisation’s working area that may not be directly connected to the Policy as well.

*Criteria for selection:* He/she should have worked on child protection related projects/programmes in the past. The person should be accessible, friendly, known to be fair and exercise good judgment. The Child Safeguarding Officer will be a member and also function as the Secretary of the Child Safeguarding Committee.

The **roles and responsibilities** of the Child Safeguarding Officer are:

- Ensure that awareness and dissemination activities related to the Policy with internal and external stakeholders are conducted and track the same
- Assist in risk assessments during project proposal development phase and also provide further inputs on ongoing tracking of risks and mitigation measures
- Provide support and advice to project teams on the implementation of the Policy
- Function as the first contact point to register child safeguarding concerns and other violations of the Policy
- Follow up on all complaints made and work closely with other Child Safeguarding Committee members for the same; paying particular attention to supporting the affected child/children as needed and feasible

- Undertake documentation and maintain all records, minutes of meetings, enquiry reports etc related to the Child Safeguarding Committee's functioning and the overall implementation of the Policy
- Maintain and promote confidentiality for enquiry and other processes while also being cognizant of the needs for accountability and transparency of the Committee's functioning

The Child Safeguarding Officer will be supported by **another representative of the Praajak personnel who will also be a part of the Committee**. This staff/consultant member will act as a complimentary interface with the organisation as well as undertake other responsibilities as needed. The **two Praajak personnel will also, collectively, explore means of taking periodic feedback from children directly or through relevant teams**, on their engagement with the Policy. They may include this as an element in visits undertaken to locations.

The staff/consultant representatives can involve other Praajak personnel for specific actions or seek inputs/records from them with due intimation to the Director.

### **Child Safeguarding Committee**

Praajak shall constitute a Child Safeguarding Committee that will play a key role in steering the implementation of the Policy including PSEA actions.

*Composition:* The committee shall consist of a Governing Body member, preferably a woman (nominated by the Governing Body), two staff / consultant members of Praajak and an external member. The external member should have experience in child protection, legal issues, mental health and/or other spheres of development practice. The Governing Body member will be the chairperson of the Child Safeguarding Committee. There will be an emphasis on maintaining a gender balance as far as possible in the composition. The Committee will meet on a bimonthly basis. It will convene earlier where needed. Further, Child Safeguarding Committee members (including the Child Safeguarding Officer) will serve a term of three years. They may be considered for continuation of one more term.

The **roles and responsibilities of the Child Safeguarding Committee are:**

- Track the ongoing implementation of the Policy through quarterly stocktaking exercises and annual compilations of the same (see section below)
- Provide inputs and suggestions to the Director and project teams for strengthening implementation of the Policy as needed
- Initiate/undertake periodic review of the Policy and work on the findings to refine/enhance the Policy implementation as needed
- Promote opportunities and spaces for discussions on child safeguarding across levels of Praajak personnel and with children
- Take up all complaints/concerns related to violation of the Policy and follow procedures of fair enquiry, maintaining confidentiality
- Provide findings and recommendations for actions to the Director keeping the best interests of children in mind
- Provide updates to the Governing Body including highlighting emerging risks and other child safeguarding issues for discussions and decisions as needed

(The enquiry process and related aspects are outlined in the next chapter on reporting and responding protocols.)

### 5.3 Monitoring Implementation of the Policy

The Director has the overall responsibility for implementation of the Child Safeguarding Policy. However, as outlined earlier, all levels of personnel as well as other stakeholders have to play their part as well.

Further, the team leaders/line managers/coordinators will be expected to provide the following information to the Child Safeguarding Officer and the other designated staff/consultant representative in the Committee at a quarterly basis.

- Number of Praajak personnel who joined in the last quarter
- Number of Praajak personnel who underwent induction
- Details of induction (attendance list, details of session/s on the Policy) and photographs
- Number of Praajak personnel who signed the declaration of commitment to the Policy
- Number of visitors and other external stakeholders to the unit/team and number of those who signed the declaration of commitment
- Number and nature of awareness activities with children on the Policy (with documentation – minutes of meeting/any other record, materials used, children’s feedback)
- Number and nature of awareness activities with other stakeholders on the Policy (with documentation – minutes of meeting/any other record, materials used, stakeholder feedback)
- Status on risk assessment and mitigation: Update on risk assessment format filled at proposal development stages, risks addressed, any new or emerging risk and plan for the same

The Child Safeguarding Officer and the other staff/consultant representative will compile the information. Further, number and nature of concerns reported to the Child Safeguarding Committee and related status will also be added. These will be shared with the Committee. Further suggestions and feedback will be provided to specific teams as needed. These quarterly updates will be consolidated into an annual update by the Child Safeguarding Committee. The annual update will be shared with the Director and the Governing Body. This will highlight the strengths as well as areas of improvement. Further plans such as for capacity building can be made accordingly for the following year.

## [Chapter 6] REPORTING AND RESPONDING PROTOCOLS

### 6.1 Reporting Suspected Violation of the Policy

#### What can be reported?

- Any risk to children who are in contact with Praajak, due to any action or lack of adequate attention and action by Praajak personnel or other stakeholder associated with the organisation, is to be reported.
- Any form of child abuse (physical, sexual, emotional/mental/psychological, neglect) suspected or witnessed has to be reported. Any other violations of the codes of conduct (appropriate behaviours) with children and other sections of the Policy have to be reported too.
- The possibility of a violation of the Policy is also to be reported.

Praajak may receive information of child protection violations in family and community settings which does not involve its personnel or any actor who made contact with the child through it. These may not fall directly under the purview of the Policy. However, Praajak as an organisation is committed to extending support as feasible in all such situations. The local teams will be encouraged to respond as needed.

#### Who can report?

- Any child, family member/other community member can report.
- The report can come from Praajak personnel as well as visitors and other stakeholders who become aware of any violation of the Policy.

#### Who should such matters be reported to and how?

- All reports of suspected violation of the Policy have to reach the Child Safeguarding Officer.
- If a child or community member reports to a staff/consultant/associate/volunteer that he/she trusts, then it is the responsibility of that specific personnel to communicate this to the Child Safeguarding Officer.
- Please note that all Praajak personnel are obligated to report any concerns about alleged or suspected harm to the Child Safeguarding Officer. Failure to report any observations / reports you have received, however uncertain, could result in disciplinary action.
- The immediate report can be provided over phone or via email to the Child Safeguarding Officer. This should be done as soon as possible and no later than six hours.
- Subsequently, a written report should also be provided using the format given in Annexure IX.
- The Child Safeguarding Officer or any other staff may need to help the child/person to write the report if needed. This can be in any language in which the child/person is comfortable.
- This written report has to be provided as soon as possible and no later than 24 hours of the suspected incident/knowledge of risk.

- Where the matter concerns/affects the Child Safeguarding Officer, the report can be shared directly with the chairperson of the Child Safeguarding Committee and the Director.
- If the report implicates the chairperson/other members of the committee or the Director, then it should be shared directly with the President or the Secretary of the Governing Body.
- If there is a concern regarding the President and Secretary, then the report should be directly shared with all Governing Body members.

## **6.2 General Guideline for Handling Disclosure of Violation of Policy**

### **If a child/children reports**

When the child verbally shares a concern/risk/experience of violation of Policy with a specific Praajak personnel:

- Listen carefully and calmly.
- Reassure the child that reporting the behaviour/risk/incident was the correct thing to do. Do not use expressions such as – ‘I don’t believe you’, ‘This person can never do something like this’, ‘I am shocked’.
- Ask open ended questions and gather as much information as possible. Be mindful of the state of the child while doing so. Also, be careful to not influence the child by the way the questions are framed.
- If any aspect is unclear, cross check with the child. If necessary, repeat to the child what you think was said to verify.
- Ask the child if anything can be done for immediate protection/safety/wellbeing as applicable.
- Ask if there was any other child/adult that can also speak about this risk/experience – as witness, or is aware in some form.
- Ask the child if he/she has shared this with parents or other trusted adults and their response to the same.
- Try to obtain a sense of the possible support structures (trusted adults) for the child who can be relied upon to support in this matter.
- Let the child know what you are going to do next. Explain that you may have to share this information with a special committee in the organisation that is expected to look into such matters. Highlight that the child’s wishes will be respected and that this matter will not be openly discussed.
- Do not allow your own doubts/disbelief to prevent you from reporting the allegation. If you have any opinions on the matter, you can share your observations separately with the Child Safeguarding Officer or the Committee.
- Tell the child that a written report has to be made. Check if the child wants to make the report and wishes to sign on it or would like the specific Praajak personnel to do it
- Be aware that the child who reports may feel scared and threatened. Do explore if there are risks to the child’s safety and wellbeing and inform the Child Safeguarding Officer of the same.

- All concerns shared by children have to be taken seriously and reported to the Child Safeguarding Officer.

### 6.3 Responding to Suspected Violation of the Policy

Praajak is committed to responding to all reports or indications, including rumours, that suggest a child may be harmed or at risk of harm. The safety of children must be of paramount concern at all times.

The following protocol is to be followed where the suspected violation/risk is caused due to Praajak personnel or any stakeholder who contacted the child through the organisation. The Child Safeguarding Officer is responsible for ensuring that the protocol is followed so that suspected cases of abuse and/ or breaches of the Child Safeguarding Policy are responded to appropriately and referred promptly to the relevant authorities as required.

Concerned Praajak personnel and Child Safeguarding Officer to cross check regarding **immediate needs of the affected child** (medical, counselling, safety etc) and make arrangements as possible; If child is in immediate danger, contact emergency service like CHILDLINE, police, District Child Protection Officer and/or other professionals; check sharing of incident with family/guardians and be mindful of informing and involving them as required; ensure no further contact between child and alleged abuser

**Child Safeguarding Officer** to report the matter (when informed verbally) and then forward written report to **the Committee**; Child Safeguarding Officer to share his/her immediate observations if any; **Committee to convene meeting** as soon as possible and not later than two days

**Committee to undertake enquiry directly as a group/through the Child Safeguarding Officer or by deputing specific Praajak personnel; to interact with the child and get further information**; due attention to be given if child has any specific/special needs; also **engage with others involved** including witness if any; **engage with the alleged abuser**; Committee to look at any other records as needed; child can be asked to provide any further information or support needed verbally and in writing – this can be sought from the family also; to **complete enquiry and provide findings and recommendations as soon as possible and not later than 15 days of receiving the initial report**

**Note: The Committee in consultation with the Director should see if the concerned matter needs to be reported to police or any statutory body and take steps accordingly.** The Committee will also have to be aware of its own boundaries. It cannot interfere/supersede legal proceedings.

Committee to ensure that the matter stays **confidential** and discourage discussions beyond the committee and any other specific personnel as needed; Child Safeguarding Officer to **maintain all records** of the processes undertaken

**Alleged abuser given an opportunity to share** his/her experience and opinion during the enquiry process; should not be considered guilty till so proven; if there is evidence of wrongdoing, he/she may be issued show cause notice; person has to give explanation in writing

**For proven guilt, final decision to be taken by Director on disciplinary action (based on recommendation of Committee), legal action may also be taken where warranted**

## Key Points to Remember

- The Committee will take all reports seriously and make due enquiries.
- The Committee will support the child/adult who has made the complaint/report. There will be a conscious emphasis on ensuring that the child/adult who has reported does not have to face adverse consequences for this act. In the context of Praajak personnel making the report, this translates into greater attention to see that he/she is not mistreated for reporting.
- The Committee will be guided by the best interests of the child. It will also aim to consistently provide space for the child to express and to strengthen his/her agency.
- Where needed, the Committee can recommend suspension with/without pay for any Praajak personnel if their continued presence can impact the child's well being and the enquiry/other related processes. Similarly, an intern/service provider/other stakeholder may be suspended from association with Praajak while the enquiry is on. The Director will take the decision in such matters.
- Any allegation related to sexual offence against children by Praajak personnel or other stakeholders who contacted the child through the organisation will be taken with greatest degree of priority.
- The Committee will maintain a list of referral services that can be used as needed. It will also encourage local teams/units to also maintain such a list of contacts/services.
- All documents related to the enquiry will be maintained properly. However, access to these will be restricted only to the Committee and the Director.
- The Committee should maintain records of follow up with affected child/children as needed. It should also document the closure of the support process mentioning the reasons for doing so and the status of child.
- If the allegation made is found to be false, the Committee should aim to determine if it was made in good faith and there were plausible grounds for thinking of a suspected violation. If it seems that the allegation was made in good faith, then no action should be taken against the complainant. However, if it turns out the allegation was made with conscious, bad intent, then the Director can consider taking action against the person. This is, of course, a complex and sensitive dimension and the decision is to be taken based on the specifics of the matter.
- Where the investigation results in dismissal of a specific Praajak personnel, the Committee will decide how this has to be communicated within the organisation. Confidentiality and best interest of the affected child will be the guiding consideration. In some cases, others may be told that a breach of safeguarding protocols occurred but no further details given.
- The Committee will aim to be transparent and accountable in all its functioning.

## Appeal Process

The individual (alleged abuser who is found to be guilty by the Committee) will have the right to appeal this decision. In such instances, the individual must write to the Secretary, Praajak within

10 days of receiving written confirmation of the close of enquiry. The individual should explain the grounds for appeal. The Secretary, Praajak will consider the appeal. This will include re-examining the evidence and reports, talking directly to staff and others involved. The Secretary, Praajak will come to a final decision which will be given in writing within two weeks of receiving the appeal. The decision from the appeals process is final.

#### **6.4 Where the Reported Violation Does Not Involve Praajak**

There may also be situations where the reported allegation concerns a family/community member or any other individual not associated with Praajak. In other words, the incident may not have a link with the organisation. In such situations, the concerned Praajak personnel should immediately inform the line manager/coordinator and proceed further based on his/her instructions. Such incidents may require reporting to the Child Welfare Committee (CWC), police or any other body as needed. CHILDLINE (1098 emergency service for children) can also be approached for assistance. The child and family may need to be supported in approaching these actors.

If needed, the line manager/coordinator can contact the Child Safeguarding Officer for inputs or suggestions. The Child Safeguarding Officer should report to the Committee regarding the request and support provided. Where needed, the Committee can also give its feedback.

#### **6.5 Ramifications of Misconduct**

If the allegation against a specific Praajak personnel is proved correct, then the Committee can recommend disciplinary actions ranging from issuing of warning to dismissal from service. The recommendation will depend on the nature of the violation, harm caused to the child/children and other contextual factors. However, any act of abuse (including neglect) that places a child at risk or causes physical and sexual abuse will lead to immediate dismissal. Legal action will also be taken where warranted. The Director will take the decision in consultation with the Committee.

Further if any Praajak personnel or Governing Body member is booked under any section of The Protection of Children from Sexual Offences Act 2012, his/ her services / membership/ internship will be terminated with immediate effect.

In case of other stakeholders (including interns, visitors etc), Praajak will take action based on the nature of the incident. This can range from issuing of warning letter, informing the related institution/agency, severing individual and institutional ties and legal action. This will also apply to vendors and service providers as well.

Where a conviction occurs through legal process, the individual will be blacklisted from working with Praajak in the future.

**If an allegation of child abuse occurs in an organisation (NGO) with which Praajak is working in a specific project:** As per the initial terms of agreement, the organisations have to agree to follow, at the very least, Praajak's code of conduct (if they do not have their own Policy). They also have to commit to speedy and prompt response to any allegations of child abuse. These clauses will be upheld. Praajak will provide support as needed (such as providing guidance on a reporting and response pathway including enquiry, reporting to police or other statutory body as needed). The organisation will be asked to provide a report on the steps taken including support provided to the affected child/children, outcome of internal enquiry/referral to police etc. The emphasis will be on helping the organisation enhance its systems of safeguarding.

In the event of persistent poor practice or abuse within a particular organisation, Praajak will terminate the working relationship. It may take legal action where so warranted. Praajak will always aim to work with organisations to improve practice and address concerns before considering termination of the relationship.

## [Chapter 7] REVIEW

### 7.1 Review Process for the Policy

Praajak's Child Safeguarding Policy will be reviewed every three years. This can take place earlier also depending on the context and any emerging needs. Reflections from the annual compilations of monitoring indicators and related action plans can also trigger this.

The review will be undertaken in a participatory manner. It can be steered by the Child Safeguarding Committee. External consultants can also be involved. The review will focus primarily on feedback from Praajak personnel as well as children engaged with. Tools utilised in earlier review can be revisited and used. Additional elements/modifications can be done in the tools. New tools may be developed as needed. Feedback from parents/guardians or local community representatives can also be considered.

The emphasis should be on understanding the experiences of all these key stakeholders (internal and external) related to the Policy – such as recall and articulation of key aspects including code of conduct, reporting and responding protocols, direct involvement/participation in Policy related awareness activities, feedback on any communication materials used, aspects that need greater attention etc.

The findings of the review will be shared with those who participated in the exercise. Addition/changes that need to be made in the Policy document will be identified. The related revision and updation will be undertaken. The draft with changes will be placed before the Governing Body. It will be put in practice after the formal endorsement of the Governing Body.

## ANNEXURE I: Key Terms

### Child

A child is every human being below the age of 18 years.

### [Related to Child Abuse]

### Child Abuse

'Child abuse' or 'maltreatment' constitutes all forms of physical and emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power' (WHO, 1999). Child abuse can take place in many forms. These can also intersect or overlap.

- **Physical Abuse** is an injury resulting from beating, slapping, hitting, pushing, shaking, kicking, throwing, pinching, biting, choking, pulling hair burning with cigarettes, scalding water or other hot objects, severe physical punishment etc. Even if the injury was not intended, the act is considered physical abuse.
- **Sexual Abuse** is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes a range of legally recognised offences from verbal, gesture and non contact forms to contact related, non penetrative forms. It could be online, offline or both. The Protection of Children from Sexual Offences Act 2012 outlines these forms. It also places higher penalties where the offence is aggravated i.e. the abuser was in a position of trust (such as family member) and/or in position of authority (such as police) or tasked to care for children (such as in child care institutions). The term "Sexual exploitation" is used for 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. Increasingly, **sexual abuse and exploitation (SEA)** is being used as a composite term.
- **Emotional Abuse** is another person's attitude, behaviour or failure to act that interferes with a child's mental health or social development. It can range from a simple verbal insult to an extreme form of punishment. Emotional abuse can have more long – lasting negative psychiatric effects than either physical abuse or sexual abuse. Other names for emotional abuse are: verbal abuse, mental abuse, psychological maltreatment or psychological abuse. Emotional abuse can range from a simple verbal insult to an extreme form of punishment.
- **Neglect** is a common form of child abuse, yet often lies unidentified. It is typically an act of omission, of not doing something that was essential for the care and development of the child. It includes but is not limited to failing to provide adequate food, sufficient or seasonally appropriate clothing and /or shelter. It could be a single act or a pattern of failing to provide for a child's basic needs. However, if a family is unable to obtain three meals for itself, a failure to provide the same to a child cannot be termed neglect.

### **Peer-to-Peer Abuse**

Abuse can occur within peer to peer relationships as well. Bullying is a well-recognised form. This includes verbally belittling or insulting someone, teasing, exclusion, forcing to do specific actions for gaining membership into a group/circle. It also covers taking one's possessions like tiffin boxes, text books, copies, shoes etc which are to be given back only on fulfillment of certain conditions. Peer to peer abuse can include the four forms of abuse described above including physical and sexual harm. It can be online, offline and both. It can include online forms such as cyber bullying; blackmailing using pictures, threatening to share revealing/inappropriate messages, pictures or videos on social media etc.

### **Exploitation**

The physical, mental/emotional and sexual abuse of a child for financial or other benefits is regarded as exploitation. This includes commercial sexual exploitation, child trafficking and child labour.

*Increasingly, 'Violence Against Children' is also being used as an umbrella term that includes all forms of abuse and exploitation of children.*

## **[Related to Child Safeguarding and Protection]**

### **Child Safeguarding**

Child safeguarding is defined as actions aimed at:

- Protecting children from all forms of abuse and maltreatment
- Proactive actions to prevent harm
- Promotion of well being by ensuring safe environments

At an organisational level, this encompasses the philosophies, policies, standards, guidelines and procedures designed to protect children from both intentional and unintentional harm and steps to promote their wellbeing. It is part of a broader and holistic focus on safeguarding for all associated with the organisation as well as participants/other actors it works with.

### **Child Protection**

Child Protection is about protecting children from or against any perceived or real danger or risk to their life, their personhood and childhood. It is about reducing their vulnerability to any kind of harm and ensuring that no child falls out of the social safety net and that those who do, receive necessary care, protection and support so as to bring them back into the safety net. This definition is drawn from the Government of India's Integrated Child Protection Scheme. The link between child protection and child safeguarding, for Praajak, is outlined on page 05.

## **[Related to Personnel]**

### **Associate**

An associate is a volunteer who has been trained by Praajak and then undertakes specific responsibilities against a mutually agreed upon allowance.

**Contractual Staff / Consultant**

A contractual staff / consultant is a person with whom Praajak makes an agreement for a specified period to perform specific roles and with related salary/remuneration/fees/other financial consideration. The contract is typically for a year. But this period may vary (can be less or more).

**Interns**

As a part of their academic curriculum, students from different institutes/universities work at Praajak for a specific period of time with an emphasis on on-job learning. This mostly counts as academic credit for them and is unpaid. Prior permission from Praajak is needed through a written application from the concerned college/university.

**Resource Person**

This term covers any person who hired by Praajak, through a formal agreement, to facilitate workshop, training initiatives, research and other activities for children and/or staff. The agreement with the resource person covers the remuneration/fee for the work.

**Volunteers**

Any person, who chooses out of his/her own volition to extend help to Praajak without remuneration is a volunteer. This person will need to acquire prior permission from Praajak. At this stage, Praajak will also determine the suitability of engaging the person in ongoing work.

**[Other Terms]****Donor**

Donor is an individual or agency who contributes to the organisation for a specific period of time based on a mutually decided agreement. The contribution is, typically, in the form of funds allocated for specified purpose and tracked against certain parameters. The organisation is accountable to the donor and they work in partnership.

**Project Participants**

Individuals and groups, particularly at the community level, that are directly or indirectly engaged and benefit from the project or programme are known as participants. In some situations, the term 'beneficiaries' may also be used.

**Visitors**

This covers persons visiting Praajak's office and/or locations where its projects/programmes are operational for understanding the work. This excludes anyone who is authorised by law/government or any other legal contract to visit without permission or prior permission. This includes those from the Municipal Corporation/State/Central Government and the legal and justice system.

## ANNEXURE II: Risk Assessment at Project Proposal Development Stage

Type/nature of Risk	Possibility/probability (High likely, Medium & Low/unlikely)	Probable consequences on children as well as programme implementation	Probable risk management strategies/actions	Responsible person for addressing	Progress

**Initial Format Prepared by**

Name:  
 Designation  
 Date:

Person/s responsible for updating the format  
 Name:  
 Designation:  
 Frequency:

:

## **ANNEXURE III: Guidelines for Community Spaces for Children’s Activities**

The following checklist for minimum standards for office space, centre, venues of training and workshops for engagement with children can be used. Personnel are expected to also look at what is feasible and exercise their judgment.

- Location should not be close to areas with liquor shops, heavy traffic areas or those that are very polluted etc
- Physical condition: provision for electricity and ventilation, no exposed wires, functioning windows and doors, no sharp edges or other such features that can cause risk, chances of equipment/objects falling/hurting children to be considered
- Water is available for drinking and other purposes
- Provision of toilet with doors that are in proper condition and water availability
- Overall, cleanliness and hygiene in the venue/location including cooking area if any
- Updated fire extinguisher system where possible
- First aid kit
- Understanding of emergency exit and related signs/information shared with personnel and children
- Risks close to the venue – forested area, water bodies etc or other risks that may be faced by children in coming to the venue
- Consider if there are risks or barriers that children with disability may experience in accessing the venue

### **Other Pointers for Personnel**

- Risks can be of many kinds - physical and psychological, linked to disaster preparedness (especially if the area has prior occurrences or even otherwise) etc
- Every new child coming to the centres is to be received with due care and oriented about the activities. Utilise the preliminary engagements to also understand if there are any barriers to the child’s participation or other risk factors that can come into play. Encourage the children to express themselves. Also, take consent of children and family/guardians for participation in activities and any documentation.
- Engage with parents/guardians/caregivers for a holistic understanding of the child’s situation. Be observant in all these interactions.
- Identify strengths as well as risks from the engagements with children, families and other community members. Identify individuals who can support in case of any local emergencies.
- Maintain records/documentation related to the functioning of the space/venue as outlined in the project/programme. This should include aspects related to risk identification and mitigation as well.

## **ANNEXURE IV: SELF DISCLOSURE FORMAT FOR PRAAJAK PERSONNEL**

All staff, consultants, associates and other volunteers working at/with Praajak are required to complete this self-disclosure form regarding their suitability to work with children, youth, and women, as part of the induction process. Anyone who refuses to do so will be deemed ineligible to work or assist with any activities associated with Praajak. Praajak may verify the information you provide with local authorities/police records/other sources.

**(1) Have you been convicted in the past or are accused currently for the following:**

- Offences against children YES/NO
- Offences against women YES/NO
- Sexual offences or offences related to violence YES/NO
- Drugs and arms related offences YES/NO

*If you answered YES to any of the above, please provide details of the case on a separate page.*

**(2) Have you ever been convicted of a criminal offence or been the subject of a Caution or Bound Over order?**

YES/NO

*If you answered YES, please provide details of the case on a separate page. Please state the nature and date (s) of the offence (s).*

**(3) Have you ever been subject to any disciplinary action or sanctions relating to child or vulnerable adult abuse?**

YES/NO

*If you answered YES, please provide details of the case on a separate page*

**(4) You are required to self-certify that you are not known or have been categorised as actual or potential risk to children and young people by any government department/ police/ judicial systems actor/civil society organisation.**

Name:

Phone:

Address:

Signature:

Dated:

**ANNEXURE V: DECLARATION OF COMMITMENT TO PRAAJAK CHILD SAFEGUARDING POLICY BY PERSONNEL**

I ..... (name in block letters), have read and understood the standards and guidelines in Praajak’s Child Safeguarding Policy. I hereby agree to abide by the Policy including the code of conduct (norms for appropriate behaviour with children). I agree to cooperate with any proceedings under the Policy. I also understand that violation of any aspect of the Policy can lead to disciplinary action which can include dismissal and legal action where warranted.

Designation:

Signature (in full):

Location

Date

**ANNEXURE VI: DECLARATION OF COMMITMENT TO PRAAJAK CHILD SAFEGUARDING POLICY/CODE OF CONDUCT BY EXTERNAL STAKEHOLDERS**

I ..... (name in block letters), have read and understood

Praajak's Child Safeguarding Policy (    )

Code of conduct/norms of appropriate behaviour (    )

[Please put a tick mark on the appropriate option above]

I hereby agree to abide by the same. I understand that a violation on my part can lead to serious consequences including legal action in instances of child abuse.

Designation:

Address:

Signature (in full):

Location

Date:

## **ANNEXURE VII: DECLARATION OF COMMITMENT TO PRAAJAK CHILD SAFEGUARDING POLICY/CODE OF CONDUCT BY VENDORS/SUPPLIERS**

Praajak expects all Vendors/Suppliers to work with honesty and integrity, and to comply with the standards listed in Praajak's Child Safeguarding Policy (behaviour protocols/code of conduct). Vendors/Suppliers are required to show fair and high moral standards at all times.

### **A. Personal Details:**

SI No	Particulars	Response of the vendor/ Supplier
1	Your Name (in Block Letters)	
2	Your Designation (e.g. Manager/ Owner/ Executive)	
3	Name of Company	
4	Contact No of Company	
5	Your Contact Number	
6	Company E-mail Address and website	
7	Company Postal Address	

### **B. Services/ Purchase Details:**

SI No	Particulars	Please put a tick mark as relevant
<b>8</b>	<b>Type of Business</b>	<ol style="list-style-type: none"> <li>1. Manufacturer</li> <li>2. Supplier</li> <li>3. Whole sale</li> <li>4. Dealer</li> <li>5. Retailer</li> </ol>

		6. Others _____ (Please Specify)
9	Type of services	<p><b>Put tick mark before the relevant option:</b></p> <ul style="list-style-type: none"> <li>- Educational goods</li> <li>- Health care products</li> <li>- Art and entertainment</li> <li>- Accommodation</li> <li>- Food</li> <li>- Manufacturing</li> <li>- Furniture and fixtures</li> <li>- Machinery</li> <li>- Transportation</li> <li>- Information &amp; Communications</li> <li>- Finance</li> <li>- Insurance</li> <li>- Professional/scientific/technical</li> <li>- Others _____ (Please specify)</li> </ul>

**C. Confirmation:**

I/we hereby confirm that the company named above commits to the following Behaviour Protocols/ Code of conduct:

- Wear clothes and accessories that are modest and appropriate keeping in mind the local contexts. Ask for further information/inputs if uncertain.
- Interact with children only where absolutely needed and in the presence of relevant Praajak personnel who will facilitate. Prior permission is required for any engagement with children.
- Treat all children with respect and empathy, irrespective of their colour, sex, religion, caste, tribe, class, ability or any other characteristic.
- Do not use offensive or slang language when around children or with them.
- Do not use any derogatory or slang nicknames for children. Do not use any language that can be considered offensive. Speak to the children, where needed, in a manner that they can understand and contribute.
- Never appear for work, particularly before or around children, in a drunk or inebriated stage.

- Children cannot be slapped or given any form of physical or mental punishment. If there are any concerns, share with the Praajak personnel and they will intervene as needed.
- Physical contact with children is to be avoided. Where it does happen, it must be appropriate to the child's age and circumstances and one must exercise caution and judgment.
- Children cannot be given any gifts directly. This should be discussed with the relevant personnel at Praajak and undertaken only as decided mutually.
- Never behave in a manner which is inappropriate or sexually provocative.
- Never develop a physical/sexual relationship with any child.
- A child/group of children cannot be taken to another location or for any form of outing without prior discussion and permission of the organisation and the concerned families/guardians. Further, staffs will be present at such occasions.
- Use mobiles, laptops/computers, cameras and other equipment with due care and caution when with or around children.
- Children and their families cannot be interviewed or have their photographs taken without prior discussion with the concerned staff. Relevant information and photographs can be taken from the organisation.
- Never sensationalise or manipulate text and images and emphasis.
- Text, pictures, audio and audio-visual materials featuring children cannot be posted on personal pages on social media (facebook etc) or on whatsapp. Such content can be shared only where it has been cleared by the higher authority in the organisation.
- Never share information gathered during period of work at Praajak, particularly if the work involved close engagement with vulnerable children, to any other person/institution/media without prior knowledge of Praajaak.
- Never encourage contact with children beyond the visit that can be considered inappropriate or abusive in any way.
- Do not share phone numbers or any other contact information with children. This can be allowed only in specific cases (such as helplines, contact information for support services) and where it has been discussed and cleared with the concerned staff prior to the visit.

*(Additional points from the behaviour protocols/code of conduct may be attached depending on the specific context.)*

**D. Declaration:**

I/We confirm all information submitted in this form is correct to the best of my knowledge for this calendar year, and will communicate any changes in circumstances. Further, I ..... (name in block letters), have read and understood Praajak's Code of conduct/norms of appropriate behaviour ( ) with respect to safeguarding children. I hereby agree to abide by the same. I understand that a violation on my part can lead to serious consequences including dismissal of work/contract cancellation and legal action in instances of child abuse.

**Submitted by (Vendor/Supplier)**

**Received by (Praajak)**

**(Signature)**

**(Signature)**

**Name:**

**Name:**

**Designation:**

**Designation:**

**Date:**

**Date:**

**ANNEXURE VIII: CONSENT LETTER FOR TEXT/IMAGES/OTHER FORMS OF REPRESENTATION OF CHILDREN**

I, ..... (Name in block letters), age....., give my consent to take/share/publish my life story or other information regarding me in the form of text/photograph/images/audio/audio-visuals/other forms of representation within the knowledge of Praajak and keeping in view the Child Safeguarding Policy. I have been informed about the purpose of taking the information (in various forms) and how it may be used and shared.

Signature of the child (in full):

Location:

Purpose of taking life story/ photograph/images (to be filled by the concerned Praajak personnel):

Name of concerned personnel

Signature:

Date:

Name of parent/guardian

Signature:

[To be filled by children above 10 years]

## **ANNEXURE IX: REPORTING FORMAT FOR SUSPECTED VIOLATION OF PRAAJAK'S CHILD SAFEGUARDING POLICY**

1. The incident has been disclosed by child/staff/others/observed by the reporting staff her/himself:

2. The incident was observed/suspected?

3. (About the child)

Child's name:

Sex:

Age:

Address:

Name and contact details of parent/ guardian/ centre:

Language/s spoken by the child:

Other relevant information:

4. Details of incident: ( Please describe the incident as closely as possible to what you are told or to what you witnessed)

a. Date, time and place of incident

b. What happened (nature of allegation)

c. Date when the incident came to the knowledge of the personnel:

5. Details of the alleged perpetrator / subject of Child safeguarding concern:

Name:

Sex:

Age:

Address/ Current location:

Relationship to victim/how the person came in contact with child:

Occupation:

Any other information:

Position in / relation to Praajak (please put tick mark)

- a. Contractual staff, consultant, associate, volunteer
- b. Intern/Volunteer                      c. Supplier/Contractor                      d. Donor                      e. Visitor
- f. Parents/ guardian of other children                      g. Any other (Please specify)

6. Were there any other people or children involved in the incident or who witnessed (If yes, please give name, sex, age, position/designation):

7. Are any other children at risk of harm?

8. Personal observation of the reporting staff

9. Immediate action taken by staff/consultant:

10. Remarks (any matters that need priority attention, any observations):

Name of the person reporting:

Location:

Signature:

Date:

[Confidential document; to be reported to CSO]

## **ANNEXURE X: FORMAT FOR RECORDING ENQUIRY/INVESTIGATION PROCESS BY CHILD SAFEGUARDING COMMITTEE**

*Complaint Number:*

*Category of Stakeholder involved:*

*Child/children affected (number, sex and age):*

*Nature of violation:*

*Location:*

*Date of submission of enquiry report:*

### **Section 1: Enquiry Report**

Name of the person sharing the first information:

Name of Complainant:

Complaint made against:

Date of Incident:

Written Information Given to CSO on date:

Name of Witness:

Incident Summary

Enquiry Process Details (who spoken to – to cover all relevant parties, records looked at etc)

### **Section 2: Enquiry Findings**

### **Section 3: Recommendations**

[This document is to be kept confidential; restricted access]

## **Acknowledgements**

Praajak's Child Safeguarding Policy in its current and past forms has drawn from the policies and related work of several civil society organisations. We would like to acknowledge our debt to them.

Child Hope

Global Fund for Children

Keeping Children Safe

OAK Foundation

Paul Hamlyn Foundation

Plan India

Prerana

Save the Children Fund

Terre des Hommes Foundation

UNICEF

World Vision