

**Safeguarding Policy of Children and Vulnerable Persons  
Institute of Development, Education, Action, and Studies (IDEAS)**

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**IDEAS, 26 A, Valaithoppu, Cinthamani Road, Madurai – 625 001**

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# Safeguarding Policy

## Operational Guideline

### 1. Introduction

#### 1.1. Preamble

- **Institute of Development, Education, Action and Studies (IDEAS)** recognized that the expanding development paradigms have exposed children's and vulnerable person's wellbeing and rights to a plethora of risks. These risks pertain to mental, physical, emotional, and sexual abuses and threats.
- **IDEAS** reaffirms its philosophy and values that children and vulnerable persons are persons with rights. The policy thus becomes binding for all those associated with the organization, in *protecting, promoting and securing* the rights of all children and vulnerable persons at all the times, at all levels and in whatever capacity one operates. Hence, IDEAS adopts zero tolerance to any form of abuse or violation of child and vulnerable person rights within its operational jurisdiction. By adopting Safeguarding Policy, IDEAS intends to streamline all her interventions and make it child and vulnerable person sensitive, protective, and empowering in IDEAS campus and in all project locations.

#### 1.2. Rationale for the Safeguarding Policy

According to the Childline India Foundation (2014), every 155th minute a child, less than 16 years is raped, for every 13th hour child under 10, and one in every 10 children is sexually abused at any point of time. In 2012, the Government enacted the 'Protection of Children against Sexual Offences (POCSO) Act' to investigate cases of child sexual abuse (CSA). The growing and varied risk factors for children in India have led the development organizations to respond to the scenario, by advocating and striving to setting highest achievable standards for child rights and protection in organizational work culture and interventions. Increasingly vulnerable persons are becoming victims of abuses. IDEAS has been reaching out to the marginalised communities, with special focus in Tamil Nadu through its various social services.

#### 1.3. Policy Statement

IDEAS upholds children's rights as enshrined in the UNCRC and national laws for protection and promotion of the child rights. IDEAS also commits to the Code of Canon Law (795) whereby children and young persons are cared for in such a way that their physical, moral, and intellectual talents may develop in a harmonious manner, so that they may attain a greater sense of responsibility and a right use of freedom and be formed to take an active part in social life.

The Safeguarding Policy is a concrete commitment of IDEAS to protect, promote, preserve childhood against all possible threats and risks in its operations and processes at all stages of programme design and partnership development. IDEAS is committed to creating and maintaining an environment, which is conducive to promotion of the rights of all children and vulnerable persons. IDEAS will continue to empower children and vulnerable persons, create awareness among her personnel and varied stakeholders, and associates; parents, families, communities about child and vulnerable person rights and child and vulnerable person protection.

Thereby, it is also committed to prevent and deal with all kinds of abuses, neglect, harm, and exploitation of children and vulnerable persons. The 'best interest of the child and vulnerable person' would be guiding principle for any decisions and actions in response to child and vulnerable person protection. Hence,

- IDEAS is committed to actively prevent child and vulnerable person abuse.

- IDEAS takes positive action to prevent child and vulnerable person abusers becoming involved in any way in her operation and takes stringent measures to prevent partners from employing child and vulnerable person abusers.
- IDEAS will take stringent action against any of its staff and/or associate or visitor allegedly found violating or abusing a child or vulnerable person or found abetting any such act that exposes the children and vulnerable persons to any risk, abuse, or exploitation of their rights.

#### **1.4. Aim and Scope of the Policy**

Generating protective and safe environment and protecting a child and vulnerable person from any type of abuse is the moral responsibility of IDEAS within operational areas. Safeguarding Policy is a concrete expression of IDEAS's wholehearted commitment to the welfare, protection, rights and empowerment of its project children and vulnerable persons.

The Safeguarding Policy is meant to ensure -

- Children and vulnerable persons at all IDEAS projects are protected from physical, sexual and emotional abuse and inappropriate behaviour while receiving services within or outside its project area by the Management, Employees (whether full time or part-time, whether paid a salary or honorarium or providing free services, whether permanent, temporary or on contract; in office, field or elsewhere on-duty), Volunteers, Visitors (journalists, media, researchers etc.), Board Members, donors, partner organisations, consultants, associates, Government officials brought in contact with the child or vulnerable person or others.
- The protection and participation of children and vulnerable persons under IDEAS projects is key priority and there is a responsibility to defend them from all possible physical, sexual, emotional, and moral dangers.
- There is a responsibility to take care of the Children's and Vulnerable Person's Rights, to promote and defend the rights of children and vulnerable persons, especially their rights to survival, health, education, development, participation, and protection.
- That the employees carry out their duty to study, interpret and implement activities as per laws enacted in the country and the human rights standards laid down by the international community for the protection and promotion of the rights of the children and vulnerable persons.
- A constant endeavour to promote awareness, education, recognition, prevention and intervention regarding child and vulnerable person abuse.

In case of report of child and vulnerable person abuse from areas other than operational, if it comes to her knowledge, it will have the moral responsibility to direct the same to referral services for the victim to concerned child and vulnerable person protection bodies, such as the CHILDLINE and/or other constitutionally instituted child and vulnerable person care and justice systems.

#### **1.5. National and International Legal Framework on Child Protection**

The UNCRC was ratified by the Government of India in 1989, which forms the backbone of all children focused statutes in India. This has made it binding on the national government to take necessary actions to ensure children the right to survival, protection, participation, and development. In 2017, India signed the ILO Conventions on minimum age of employment (138) and worst form of child labour (182).

The contents of the CPP are in accordance with the Constitution of India, the laws enacted by the Government of India, the standards laid down by international agency like United Nations, and in harmony with the guidelines of the Code of Canon Law of the Catholic Church. As put down in the UNCRC, children have a right to be protected from abuse and maltreatment.

## A) The Convention on the Rights of the Child (UNCRC) defines:

**Article 1 (Definition of the Child):** "a child' as a person below the age of 18".

**Article 2 (Non-Discrimination):** No child should be treated unfairly on any basis. Among them is the principle of child welfare, the right to life and development as well as respect for the beliefs of a child.

**Article 19 (Protection from all forms of violence):** "legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation".

**Article 28 (Right to Education):** The government should make primary education compulsory and available free to all. Any form of school discipline should be administered in a manner consistent with the child's human dignity.

**Article 32 (Child Labour):** The government should protect children from work that is dangerous or might harm their health or their education.

**Article 33 (Drug Abuse):** Governments should use all means possible to protect children from the use of harmful drugs and being used in the drug trade.

**Article 34 (Sexual exploitation):** Governments should protect children from all forms of sexual exploitation and abuse.

**Article 37 (Detention and Punishment):** No child shall be subjected to torture or other cruel, inhuman or degrading treatment or punishment; deprived of his or her liberty unlawfully or arbitrarily; and should have the right to prompt access to legal and other appropriate assistance.

## B) National legal frameworks to Protect Children

1. **Protection of Children from Sexual Offences (POCSO) Act, 2012** This Act has been drafted to strengthen the legal provisions for the protection of children from sexual abuse and exploitation and to address the issue of sexual offences against children.
2. **The Child Labour (Prohibition and Regulation) Act 1986, Amendment 2016** outlines where and how children can work and where they cannot.
3. **The Right of Children to Free and Compulsory Education Act, 2009, Amendment 2019** outlines the provision of quality education for all children between the ages of 6-14 as per the constitutional fundamental right awarded to children in the 86th amendment
4. **The Juvenile Justice (Care and Protection of Children) Act 2000, Amendment 2016** protects not only the Rights of children, but a person's rights when he/she was a child. It outlines two target groups: Children in Need of Care and Protection (CNCP) and Juveniles in Conflict with Law.
5. **Chapter III of JJB address Children in Need of Care and Protection (CNCP)**, in place of a Juvenile Justice Board (JJB), CNCP cases are heard by the Child Welfare Committee (CWC). CWC's purpose is to provide for the care, treatment, protection, rehabilitation and development of the child and in doing so upholds the rights of the Child.

### 1.6. Definitions of terms

1. **Child or juvenile:** A "child" or "juvenile" means a person who has not completed eighteenth year of age, as per section 2(k) of the Juvenile Justice (Care and Protection of Children) Act, 2000 as amended in 2006. This is in conformity with the UNCRC, 1989 (Article 1) to which India is a signatory.
2. **Child Protection:** Child protection is the protection of children from violence, abuse, exploitation and neglect, in and out of the home (Article 19, UNCRC). For IDEAS, child protection is a non-negotiable to secure and promote all the four fundamental rights of children as enshrined in UNCRC viz. Right to Survival; Right to Development; Right to Protection; and Right to Participation.

3. **Child Sexual Abuse:** Protection of Children from Sexual Offences Act (POCSO), 2012, defines different forms of sexual abuse, including penetrative and non-penetrative assault, as well as sexual harassment and pornography. It deems a sexual assault to be “aggravated” under certain circumstances, such as when the abused child is mentally ill or when the abuse is committed by a person in a position of trust or authority like a family member, police officer, teacher, or doctor.
4. **Adult:** An ‘Adult’ means a person aged 18 years and above
5. **Allegation:** a statement which says that someone has done something wrong or illegal but has not yet been proven to be true or otherwise.
6. **Alleged Perpetrator:** person thought, but yet to be proven responsible for the actions that are the subject of the concern or incident that is being reported.
7. **Child Victim:** Child who has suffered or may be suffering or is at risk of suffering as a result of the issue that is being reported.
8. **Complainant:** Person reporting the issue. Note that the complainant may also be the rapporteur/recordist if they are the same person recording or writing up the issue.
9. **Complaint:** a formal statement verbal or written that something is wrong or unsatisfactory or of suspected, potential, alleged or actual abuse.
10. **Concern:** something that causes worry or is of worry
11. **Incident:** the event which is being reported
12. **Issue:** the child protection concern, complaint or incident being reported
13. **Vulnerable Person:** A ‘Vulnerable Person/s’ means a person who is unable, or unlikely to report sexual assault, sexual exploitation, and/or sexual harassment unless assisted in doing so due to impairment of a mental or physical function, or due to unequal power relationships with a person in a position of power, authority, or in control of resources who seeks or accepts to provide protection, assistance or service in exchange for sexual acts or favours. It also includes taking advantage of a position of vulnerability, differential power, or trust for sexual purposes.

### 1.7. Types of abuses

1. **Physical Abuse** is the actual or potential physical harm caused by an action or lack of action, which is reasonably within the control of the parent or person in a position of responsibility, power or trust.
2. **Sexual Abuse** is evidenced by an activity between a child or an adult or vulnerable person and other adults who, by age or development, is in a relationship of responsibility, trust or power; the activity being intended to gratify or satisfy the needs of the other person (Ref to POCSO, 2012).
3. **Mental/Emotional Abuse** is the persistent emotional ill treatment of a child or vulnerable person that adversely affects his or her self-perception and development. It includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child or vulnerable person can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential, and in the context of the society in which the child dwells. There may also be acts toward the child or vulnerable person that cause or have a high probability of causing harm to the child’s or vulnerable person’s health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment (WHO, 1999).
4. **Economic abuse** refers to use of the child or vulnerable person in work or other activities for the benefit of others. This includes, but is not limited to, child labour, child prostitution and trafficking. These activities are detrimental to physical or mental health, education, moral or social-emotional development of children (WHO, 1999) and vulnerable persons.

5. **Neglect and negligent treatment:** the persistent or severe neglect of a child or vulnerable person or the failure to protect a child or vulnerable person from exposure to any kind of danger, including severe weather conditions and starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's or vulnerable person's health or development, including non-organic failure to thrive. This includes the failure to properly supervise and protect children and vulnerable persons from harm as much as is feasible by the family or care giver.
6. **Exploitation** consists of the commercial or other use of the child or vulnerable person through activities that the child or vulnerable person performs for the benefit of a third party. These activities include exploitative child labour, child prostitution, trafficking as well as any other activity that leads to the economic exploitation of the child, that is to the disadvantage of the child's and vulnerable person's physical or mental welfare, that prevents the child from receiving an education or damages the child's moral and psycho-social development.
7. **Child to child abuse** is allegation or concern regarding the abuse of a child by another child need to be responded to, with sensitivity, nevertheless, they have to be dealt with through the legal child protection procedures. All work with young people who have committed abuse requires an effective approach which ensures the protection of people affected, while at the same time supporting the young person in challenging and changing his/her behavior.
8. **Bullying** is understood to be a significant and very common form of harm that children and vulnerable persons experience. This may take the form of physical or verbal intimidation, aggression, violence, or exclusion on the part of a person – typically a peer or another child/young person, who is more powerful than the victim of the bullying. Bullying may happen for a number of reasons and includes expressions of racist and sexist attitudes.
9. **Abuse using the internet or other media and abusive images of children** which is commonly referred to as child pornography, is defined as any representation, by whatever means of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for sexual purposes.
10. **Historical allegations of abuse:** Historical abuse in this policy refers to abuse which a person reports as having suffered as a child or young person while in contact with IDEAS/associates. It is often the case that an individual does not report abuse until many years after the event.
  - Any such allegations are raised as a child and vulnerable person protection concern through the protection procedures. IDEAS is prepared to handle historical allegations of abuse transparently and responsibly.
11. **Violation of Children's and Vulnerable Person's Privacy** relates to the protection of a child's and vulnerable person's privacy that refers to private data of the child and vulnerable person as well as pictures, texts, films etc. about children and vulnerable person which are produced for publicity purposes. Any information about a child's and vulnerable person's history, medical condition and family background has to be stored carefully in IDEAS/partners administration. These data are to be handled confidentially and with discretion. Children and Vulnerable Persons and even their parents or caregivers might not always be aware of a specific form of emotional abuse which might occur in fundraising, public relations, or communication. IDEAS and partners should not produce unauthorized publicity material (pictures, films, texts, etc.) featuring boys or girls; or by presenting sensitive information within a context that reveals the child's and vulnerable person's identity and violate children's and vulnerable person's right.
12. **Perpetrator** is a person who is proven guilty of child or vulnerable person abuse within the meaning and context of IDEAS Safeguarding Policy.
13. **Recordist** is a person recording or writing up the issue being reported. Note that the recorder can also be the complainant if they are the same person reporting the issue.

### 1.7.1. Effects of Sexual Abuse:

- **Psychological Effects:** Include lower self-esteem, higher rates of depression, anxiety and eating disorder, substance abuse disorders, Post-Traumatic Stress Disorder (PTSD) and sometimes, suicide.
- **Interpersonal Effects:** The ones that effect the victim's ability to form effective and meaningful relationships, disorganized attachments in adult relationships and increased rates of separation and divorce.
- **Behavioural Effects:** These often emerge as violations of social values and abused children and vulnerable persons tend to display higher rates of academic and conduct problems, are at greater risk for committing property offences, domestic violence, among others.

**1.7.2. Trauma Counselling:** In case of abuse, both victim and abuser need trauma counselling. Victims need counselling to understand the complex and confusing emotions experienced while the sexual abuse was taking place and can be helped to lead healthier and happier lives in the future. Specialist counselling for men, women, children (and/or vulnerable persons) can offer guidance and clarity for a person to start to explore this sensitive subject without feeling any pressure. Issues to be addressed among victims are anger, trust gaining, withdrawal, guilt, among others. Abusers too need trauma counselling in order to be free of their compulsive behaviours which may be harmful to themselves and others. Issues to be addressed among abusers are denial, anger, empathy deficits, etc.

## 2. Guidelines for Child and Vulnerable Person protection at IDEAS

### 2.1. Code of Conduct for Employees

IDEAS reaffirms its commitment to creating and maintaining an environment which promotes its core values and prevents abuse and exploitation of children and vulnerable persons. IDEAS and partners are expected to contribute to building an enabling and inclusive workplace based on team spirit, mutual respect and understanding for children's and vulnerable person's rights, their safety, protection and development. IDEAS's Code of Conduct requires all employees to comply with the following protocols:

1. Employee will treat children and vulnerable persons with respect regardless of caste, gender, language, religion, political, national, ethnic or social origin, disability, birth or other status and recognise their right to personal privacy.
2. Employee will not engage in any form of physical (corporal) punishment to children and vulnerable persons, harassment, discrimination, physical or verbal abuse, intimidation, favouritism or exploitative (physical, mental, sexual) relations.
3. Employee will ensure their actions are open and non-secretive with the child and vulnerable person; and they don't do things for children and vulnerable persons of a personal nature that they can do for themselves.
4. Employee will ensure that the partner, staff, associates, visitors who work with the children and vulnerable persons, or come in contact with the children and vulnerable persons, keep safe and respectable distance when interacting with children and vulnerable persons; and refrain from expressing their affection by holding, kissing, embracing, cuddling, touching or maintaining eye contact with a child or vulnerable person in an inappropriate, unnecessary or culturally insensitive way.
5. Employee will ensure that no child or vulnerable person is employed at office or providing any service to the office/staff through its vendors.



6. Employee will ensure the partner, associates, visitors do not use inappropriate, offensive or discriminatory language/local slang or remarks when speaking with a child or vulnerable person or surrounded by a child or vulnerable person; and will never make suggestive remarks or gestures, even in fun.
7. Employee will ensure that it is aware of situations that may expose child or vulnerable person to any protection and development challenges and threats and pro-actively develop strategies to create safeguards to protect the interests, safety and wellbeing of child and vulnerable person.
8. Employee will dialogue with children and vulnerable persons in programme areas with adequate scope for receiving children's and vulnerable person's views on the decisions and actions taken on their behalf.
9. Employee will comply, be guided, and bound by national laws on child protection as mentioned above.

## **2.2. Guidelines for visitors and volunteers to IDEAS and her projects**

1. IDEAS expects all its Volunteers to treat with respect and dignity all children and vulnerable persons associated with the work of IDEAS.
2. IDEAS Volunteers involved in projects having direct contact with Project children and vulnerable persons must sign a statement to say that they have read the policy, will respect and abide by it and understand that action will be taken in cases where behavior is not in accordance to the policy. This will lead to disciplinary action and possible dismissal of volunteers breaking these protocols.
3. IDEAS Volunteers are not to take selfies/photographs with children and/or vulnerable persons on their own mobile phones or any other photographic gadgets or children's and vulnerable person's phones unless for official purposes and with prior permission of the authorized staff.
4. IDEAS Volunteers should not invite children and vulnerable person or accept their invitation on the social media like Facebook, WhatsApp, Twitter etc.
5. IDEAS Volunteers should not take or invite Project children and vulnerable persons to their homes or any family celebration or functions without prior permission from the Management.
6. IDEAS Volunteers must never be alone with children and vulnerable persons who are not their own offspring in a private place that cannot be readily seen or accessed by other responsible adults.
7. IDEAS Volunteers should not go out for picnics/outings with the Project children and vulnerable persons unless it is part of the organization's exposure visit or after prior permission from the Management.
8. Where possible and practical, the 'two - adult' rule, wherein two or more adults supervise all activities where minors or children or vulnerable persons are involved and are present at all times, should be followed.
9. IDEAS Volunteers will not discipline a child in a way that is against the Convention on the Rights of the Child. This effectively means no tolerance to any form of violence against the child.
10. IDEAS Volunteers' inappropriate behavior toward children and vulnerable persons, including failure to follow IDEAS Behavior Protocols or sexual abuse of a child or vulnerable person is grounds for discipline, up to and including dismissal from volunteering services and further legal actions.
11. IDEAS Volunteers must be concerned about perception and appearance in their language, actions and relationships with minors and children and vulnerable persons. And avoid inviting or allowing children and/or vulnerable persons to stay with you at your home.

12. IDEAS Volunteers must dress appropriately and be culturally sensitive when they visit children and/or vulnerable persons, families, communities and programs or work with children and/or vulnerable persons.
13. IDEAS Volunteers should seek to live up to IDEAS Mission Statement and Core Values in all relationship with others in any circumstances.

### **2.3. Guidelines for engaging in activities with children and vulnerable persons.**

1. Recognise the developmental needs and capacities of children and vulnerable persons, avoid excessive training or competition and pushing them against their will.
2. Adhere to the time schedules.
3. Wear clothing and shoes that are appropriate for sports and adventure activities. Avoid tight clothing, revealing clothes and high heeled shoes.
4. Treat all children and vulnerable persons equally with respect and dignity. Be sensitive to the issues of children and vulnerable persons who are especially vulnerable in given contexts. For instance, the girl child, children and/or vulnerable persons with disabilities, children and/or vulnerable persons from extremely socially backward and marginalised groups etc.
5. Maintain a safe and appropriate distance with the children and vulnerable persons.
6. Do not conduct any games/ sports activities with the children and vulnerable persons unless authorised by IDEAS.
7. Avoid photographs of the children and vulnerable persons during the session without prior permission.
8. Avoid to counsel children and/or vulnerable persons on a one-on-one basis unless you are authorised.
9. Neither share nor take personal phone numbers, email address or postal address with/from children and vulnerable persons.
10. Avoid sending or accepting requests to children and vulnerable persons on personal social media platforms.
11. Do not use of foul language, inappropriate words, tease, ridicule or humiliate children and/or vulnerable persons, bully or harass any child or vulnerable person, and punish children and/or vulnerable persons. Always report problems and issues to the activity leader / coordinator / incharge.
12. The following should be avoided except in emergencies. Where unavoidable (e.g. the child sustains an injury and needs to go to hospital) ensure that action is taken only with the full knowledge and consent of person in charge).
13. Avoid spending excessive time alone with children and vulnerable persons away from others
14. Avoid any form of inappropriate touching and inappropriate language or sexually suggestive comments made to a child or vulnerable person, even in fun or reducing a child or vulnerable person to tears as a form of control.
15. Any activity practice should be done in a group.
16. Never conduct any sessions or practice with single child or vulnerable person. Any dance session must happen in the presence of teachers, IDEAS staff, partner, in-charge, parents. Inappropriate touch steps to be avoided. In the pretext of showing dance postures children and vulnerable persons should not be taken to secluded place.

17. Priority to be given for group activity performance. Use child and vulnerable person friendly language while conducting the activity with children and vulnerable persons.
18. Elicit children's and vulnerable person's participation through games and make them feel free before entering serious activity.
19. Children's and Vulnerable Person's level of understanding should be checked periodically while conducting the sessions.

### **3. Recruitment of Human Resources**

**3.1. Job advertisements** - Job advertisement will be formulated in a manner that seeks personal commitment of applicants to child and vulnerable person protection.

#### **3.2. Reference and Background check**

The employees are recruited according to a standard recruitment procedure IDEAS that considers previous work experience and references from last employers, including general conduct and behavior with colleagues. The hiring and selection procedure will communicate the extent to which the vacant position entails direct contact with children and/or vulnerable person and where the corresponding risks for inappropriate conduct might lie.

1. In interview procedure, the explanation for applying the job will be asked, the documents will be thoroughly checked to assess the career tracks, any frequent changes of jobs without any reason. The questions will be raised about the person's interest in working environment, and the candidate's attitudes towards the children and vulnerable persons and the child and vulnerable person policy measures.
2. IDEAS will ensure that all the references of approved local candidates for work are checked, preferably by telephone, and recorded in the staff files before the new staff member is invited to take the position. This will include a verbal and written request to the referee of whether they have any concerns as to why the candidate should be employed to work with children and vulnerable persons.
3. IDEAS staff, volunteers and visitors agree to inform the Director/Committee Member immediately if new information arises that casts doubt on the team member's trustworthiness with children and/or vulnerable persons. Such information would be treated as confidential and disclosed to the individual team member for appropriate action.
4. Individuals who are hired as consultants will be notified of IDEAS's Policy and required standards for Child and Vulnerable Person Protection and are made aware that they are expected to follow behavior protocols.

In the best interests of children and vulnerable persons, IDEAS will not hire anyone with a prior conviction for child or vulnerable person abuse, pedophilia or related offences or alleged involvement, abetment, or allegation. In case a law or competent authority deems this precautionary measure prohibitive of one's right to reformation, no person with a conviction for child or vulnerable person abuse, pedophilia or related offences or allegations may be hired into any position which includes direct access to children and vulnerable persons. IDEAS reserves the right not to hire an applicant if the background check reveals that the person is not suitable to work with children and/or vulnerable persons.

#### **3.3. Responsibility of IDEAS**

##### **3.3.1. Preventive actions**

IDEAS will undertake activities that will enable children and vulnerable persons and adults to discuss child and vulnerable person protection issues and report cases of abuses and violations without the

fear of taboo and stigmatization. In view of operationalising the Policy, IDEAS will do the following but not limited to these, going by the case requirement.

#### **a. Awareness and sensitization**

- Raise awareness on child and vulnerable person rights and protection issues among the staff, partners, associates, visitors, communities, stakeholders etc. The development of an open and responsive culture in all IDEAS and partners' programmes and within the communities and institutions we work with, is essential for safeguarding children and vulnerable persons.
- IDEAS will encourage discussions on issues of child and vulnerable person abuse to create enabling environment for children and vulnerable persons to report incidents to their parents, guardian, peers. Through protected, clear, and honest communication we give and receive both positive and critical feedback.
- IDEAS will also ensure through its projects that sufficient steps are built-in to create awareness among project children and vulnerable persons on child and vulnerable person protection and participation, with a view to develop their agency, empower them to be vigilant and report cases to their parent's/care givers/ government child and vulnerable person protection workers whenever necessary.

#### **b. Capacity building and guidance for Partners**

- To prevent child and vulnerable person abuse and exploitation, IDEAS will ensure periodic sessions on Child and Vulnerable Person protection, to orient the staff and partners on child and vulnerable person protection issues, legal measures and IDEAS Safeguarding Policy. This will be done to generate greater clarity and understanding of children's and vulnerable person's issues and vulnerability in development and special (emergency situations) programmes.
- Periodic assessments of partners programmes and practices relating to children and vulnerable persons in IDEAS projects will be conducted in project review meetings.
- IDEAS will ensure periodic trainings of Protection Committee members to enable timely knowledge update and effective discharge of duties.
- IDEAS will ensure orientation on Safeguarding Policy and issues concerning children and vulnerable persons to the volunteers at the time of induction and encourage feedback system to improve its own Child and Vulnerable Person protection measures and mechanisms.

#### **c. Linkages with Government Protection Systems**

- IDEAS will activate, strengthen, and invoke Government's protection systems at all levels (particularly at village level) in its project interventions, thereby ensure a safe and child and vulnerable person friendly environment in project areas.

**3.3.2. Whistleblower protection:** Any false alarms or malicious accusations raised will attract disciplinary action. Nonetheless, a legitimate concern raised about suspected child and/or vulnerable person abuse or threatened child and/or vulnerable person protection that proves to be unfounded upon investigation, will not lead to any action against the reporter.

## **4. General Standards for Communication**

### **4.1. Guidelines for use of children's and vulnerable person's image**

The UN Convention on the Rights of the Child asserts that every child has the right to privacy, and this extends to the right not to have their image used for any purpose for which they have not given consent. IDEAS recognizes that the world-wide web is increasingly being used by those seeking to

abuse children and vulnerable persons, and those photographs are doctored to create further abuse of children and vulnerable persons. Therefore, IDEAS will only post pictures of groups of children and/or vulnerable persons on its website, and not individuals. It will never display pictures of children and/or vulnerable persons in brothels or in vulnerable situations. IDEAS will also not nude or semi-nude pictures of in public platforms or for fund raising.

These guidelines set out IDEAS's requirements for the use of any image (either still or dynamic) in any media publication either internal or external to IDEAS. In this context, media publications include all print media (books/ reports/ newspapers/ press releases etc.), broadcast media (television/ radio etc.), and electronic or internet media (web/streaming/ multimedia).

### **Identifying children and vulnerable persons in media publications**

1. One of the fundamental rights of the child and vulnerable person is the right to a name. This must be balanced with IDEAS's policy on child and vulnerable person protection to prevent a child's and vulnerable person's identity falling into the hands of those who may wish to harm that child or vulnerable person.
2. Children and vulnerable persons who have experienced violence, exploitation, abuse or are in some way vulnerable or at risk if identified, should not have their faces displayed or be represented in any way that may lead to their identification. Their names and location should also be concealed.
3. In general, a child's or vulnerable person's real name should not be used in media publications or broadcasts, or if it is (for example where it is considered that a child or vulnerable person would benefit from increased self-esteem by seeing their name in print) the information given should not allow their precise location to be identified (either directly or indirectly). For example, a child's or vulnerable person's identity and location could be discovered if an image of a child or vulnerable person is published or broadcast which shows the name of his or her school and location.
4. When false names are used, the media should mention about the names change to protect child's and vulnerable person's privacy.

#### **4.1.1. Obtaining images**

1. If an agent is commissioned to obtain an image (for example a freelance photograph or videographer), IDEAS, partner and associates will ensure that the copyright and all other intellectual property rights for the images are assigned to IDEAS.
2. The services of an external photographer/freelancer, the images will have to be shared with IDEAS and written consent for appropriateness sought by the photographer/consultant before they are made public in any form, or occasion.
3. IDEAS will ensure she has secured royalty free, unlimited, worldwide, perpetual, irrevocable rights to use the shots in all media and that the photographer undertakes not to make the shots available to any other organisation, agency, or NGO.
4. IDEAS will have the rights to make the photographs available to their publishers for use in IDEAS publications and materials and to journalists for them to use exclusively with articles about IDEAS.
5. Photographers and videographers should be accompanied on their assignment by a IDEAS personnel, and all photo sessions must be supervised. The staff member has a key role to ensure the protection of children and vulnerable persons and it is also their responsibility to obtain consent in writing from the guardians of the children and vulnerable persons being photographed wherever appropriate.

#### **4.1.2. Consent to use of images**

1. As a general rule of law, the person who is the subject of a photograph or video recording has the right to object to the use of their image being published or broadcast (despite the fact that they may not own the intellectual property rights). IDEAS staff partner and associates must, therefore, ensure that the consent of the person being photographed or filmed is obtained in writing to be able to use the images.
2. As images are often shared between different networks and constituents of IDEAS domestically and internationally, IDEAS staff, partner and associates will ensure that the person also consents to their images being used in any form of media internationally keeping the best interest and safety standards for the child and vulnerable person (such as campaigns and online causes to garner solidarity and support).

#### **4.1.3. Informed Consent**

1. Consent in this context means informed consent. An individual must understand and acknowledge what they are consenting to. In many circumstances, a child or vulnerable person cannot give informed consent, in which case it is mandatory to obtain the consent of the child's or vulnerable person's parents or guardian, along with being informed about the objective of the same. If the parents, guardian or caretaker of a child or vulnerable person is unable to read and write, the partner staff will read out and explain the contents of this Safeguarding Policy and consent and ensure it is understood along with the purpose and signed by the parent/guardian/care taker.
2. In all cases, it must be explained to the parents (or guardian) and to the child and/or vulnerable person that they are not under any obligation to agree to the use of the images. If consent is not obtained, the images cannot be used publicly.
3. In some circumstances, it may not be possible to obtain the informed consent of a parent or guardian of the child or vulnerable person. If this is the case you may have to consider whether a responsible independent third party (for example a schoolteacher or doctor) could explain the consent process to the parents (or guardians) and the child or vulnerable person, and why their consent is required. They should state that the image may be used in the media, with a specific objective, and that the parents (or guardian) and the child or vulnerable person have understood and given their consent.

#### **4.1.4. Occasions when children's and/or vulnerable person's consent is not needed**

1. Photographs or footage of children and/or vulnerable persons in a 'street scene'/crowd do not require consent for the image to be used publicly. This is because the image has been taken in a public place and the people in the image are not the direct subject. In this case, it is the street scene, which is the subject of the image and the people in it are merely incidental to that scene.
2. Equally, there is a distinction between a photograph or footage of one or two children or vulnerable persons who are required to give consent and an image of a number of children or vulnerable persons who are not required to give their consent. This distinction lies not in the number of children or vulnerable persons in the image but rather whether the children and vulnerable persons are aware that the image is being taken and if the children and vulnerable persons are in a public place or not.
3. For example, for an image taken of a group of children and/or vulnerable persons playing unawares in the street, consent is not needed because the children and/or vulnerable persons are in a public place and they are not aware that a picture is being taken of them. However, a group of children and/or vulnerable persons playing in a school playground will need consent because their image has not been taken in a public place.

#### **4.1.5. Storing images**

1. Storing an image with details of the subject (i.e. the name and address of the child and/or vulnerable person), render the data 'personal' in nature, and may be subject to data protection laws of the

country. This will usually mean that the information may only be kept for as long as it is necessary and it may not be used for any purpose other than that which it was intended to be used for. IDEAS will have the decision on the tenure of storing these images (usually 5 years) and the photographs must be handed over by consultants, photographers, media personnel, professionals etc. who may be engaged by IDEAS, upon the completion of the assignment/event.

#### **4.1.6. Storage of consent forms**

1. Once consent forms have been signed, they must be stored in a manner which is secure for reasons of confidentiality and data protection.
2. Hard copies of unpublished images of children and vulnerable persons are kept in locked storage and electronic copies are password protected.
3. IDEAS will ensure the consent forms accompany images or videos taken with child and vulnerable person as the subject of it and decide on the tenure for storing up the consent forms in accordance with the concerned law in the country.
4. Consent forms should never be shown to a third party.

#### **4.1.7. Reporting Concerns**

- i. Should there be any concerns regarding the inappropriate use of a child's or vulnerable person's image, IDEAS staff, partner and associate must notify the Director/ Protection Committee.
- ii. All correspondence with a child or vulnerable person by the IDEAS volunteers will be subject to scrutiny for inappropriate or suggestive comments, requests, or obscenities. In the event of inappropriate correspondence being discovered, IDEAS reserves the right to terminate internship/volunteering relationship, without a certificate of volunteering.

### **4.2. Guidelines for photographer/videographer**

#### **4.2.1. Editorial principles**

1. IDEAS will ensure that the physical and emotional welfare and the dignity of children and vulnerable persons and their "best interest" are protected during the making and broadcast of programmes and online content.
2. IDEAS will ensure that children and vulnerable persons are not caused unnecessary anxiety or distress by their involvement in programmes or by their broadcast.
3. IDEAS will take responsibility to protect project children and vulnerable persons from unsuitable content with their rights to freedom of expression and freedom to receive information.

#### **4.2.2. Children and vulnerable persons and Consent**

IDEAS will ensure photographer or videographers commissioned for the project are accompanied to the field by its staff, and necessary consents from parent's/care givers, third party are secured. Children and vulnerable persons should not be asked for views on matters likely to be beyond their capacity to answer properly without consent.

When filming children and/or vulnerable persons:

1. Ensure that the child or vulnerable person and, when necessary, the parent/guardian, or other person of 18 years of age understand the nature of the project and are able to give informed consent.
2. Obtain the consent of the child or vulnerable person and respect any refusal to take part in any activity.
3. Do not give any financial inducement to the child or vulnerable person or parent/guardian to secure consent. The payment of expenses is acceptable as long as they are reasonable and legitimate.

4. Obtain permission from the head teacher for filming or interviewing on school premises or during school hours.

#### **4.2.3. Contributions from children, vulnerable persons, and young people**

1. IDEAS is duty bound to carefully consider the impact and possible consequences of any material which involves a child and/or vulnerable person, both during the production process and once the material has been broadcast. This applies whether parental consent is secured.
2. Children and vulnerable persons are often eager to contribute but many lack the judgment necessary to assess the longer-term impact it may have on their lives. Whenever and wherever necessary, IDEAS may consult experts when featuring anti-social, harmful, or illegal activity amongst children and vulnerable persons, such as illegal drug use, sexual abuse, and bullying about the best way of approaching interviews and minimizing distress.
3. It is also often advisable to have a third-party present, such as a relative, family friend, or teacher, when sensitive issues are being discussed with a child or vulnerable person. This ensures there is someone there who is familiar to them and who can help safeguard their interests.

#### **4.2.4. Anonymity**

Difficult ethical issues arise when we consider whether identification or anonymity of children and vulnerable person is in their best long-term interest. IDEAS will ensure a clear editorial justification for identifying a child or vulnerable person in photography /videography projects.

### **4.3. Guidelines for Print and Electronic Media**

Media communication is a wonderful opportunity to share concerns and awareness about child and vulnerable person protection and child and vulnerable person rights in general. With children's and vulnerable person's safety and dignity at the heart of Safeguarding Policy,

- Journalists engaged by or with IDEAS will ensure prior permission from IDEAS for interviewing children and/or vulnerable persons in her programme areas.
- Visiting journalists and should not exchange contact details with any children and vulnerable persons while visiting.
- While journalists will be briefed about the Safeguarding Policy at the onset of any assignment, the journalist should also reach out to IDEAS Protection focal point person/HR Manager in any situation where they are uncertain of what behavior is appropriate or if they want to report a concern.
- If the reporter or the media needs any information regarding the children and/or vulnerable persons, project will assess the risk associated with media contents and its publications.

#### **4.3.1. Related to photos/videos and other images:**

1. Obtain the consent of the child or vulnerable person and his/her parents or guardians before taking any photographs.
2. Take and use photographs and image of children and vulnerable persons that are dignified and respectful and that do not present them as victims. Image will not depict children and vulnerable persons in a vulnerable or submissive situations.
3. Ensure that children and vulnerable persons should be adequately clothed in photographs and not in poses that could be misinterpreted as sexually suggestive.
4. Communications about children and vulnerable persons should use pictures that are decent and respectful, not presenting them as victims.



5. Protect the safety and privacy of children and vulnerable persons and their families by not using their original names or full names; not using their images or any details which would in any way disclose their identity or confidentiality, thereby violating or endangering safety, privacy and dignity of the child or vulnerable person.
6. Ensure the photographs personally taken or sourced from IDEAS communities assisted by her would not be used for any purpose other than intended purposes agreed upon in advance through formal communication.
7. Ensure the photographs taken during the visit would be used for media purposes as a journalist, with consent of the child or vulnerable person, parents/guardian, and IDEAS.
8. Usage of photographs or interviews or any other form of media content in public domain without permission and beyond permissible scope for purposes disclosed and assigned/agreed upon in advance.
9. For assignments /occasion where IDEAS herself engages the services of media (electronic, online or print) the content must be handed over to the IDEAS and any publication must be carried out with permission of IDEAS.
10. Where photographs of children and vulnerable persons are used, IDEAS will take special care to protect children's and vulnerable person's identities and specific geographic location in all materials.

## 5. Case Management System

The goal of the case management system is to enable an appropriate and speedy investigation of given case and to identify cases of abuse and maltreatment. It ensures that the affected children and vulnerable persons are protected and that they are offered access to special support in order to protect and avoid any further injury to them. Decision makers in the protection system are provided with a frame of reference and the flow of information to relevant parties is ensured. Children and Vulnerable Persons in supported projects receive an explanation of the system's purpose and background and are involved in establishing the system as part of the project activities. The welfare and safety of the child and vulnerable person serve as the foundation for all the decisions made within the case management system.

### 5.1. The Protection Committee (PC)

The PC receives training on a regular basis. They need to handle the reported cases in the strictest confidence and to protect the identity of the concerned child or vulnerable person, informer and accused appropriately. If members of the Protection Team have a personal relationship with anyone suspected of child or vulnerable person abuse, they will be replaced by the deputy to avoid any conflict of interest. The **Protection Officer** has a duty to document each case of suspected abuse in writing up until it is closed.

#### A. Constitution of the Protection Committee

**Composition:** The Protection Committee will comprise 3 members as under.

- Protection Officer (Coordinator)
- Two members
- At least 2 be women members.
- All members must have experience of handling children and vulnerable persons and sensitive to children and vulnerable person issues.

**A. Tenure:** Three years, renewable at the end of the term.

**B. Frequency:** Meeting once in a quarter and meeting within a day of the reporting of a case.

## **5.2. Powers and Functions of the Protection Committee**

The main function of the Committee is to ensure proper investigation of child and vulnerable person abuse cases, especially those of sexual nature involving children, vulnerable persons, and young persons, so as to verify the guilt or innocence, to suggest penalties and provide advice, in keeping with country's law. The POCSO Act mandates that all cases of child abuse must be reported to CWC. Even if information is passed on to Police, it is the duty of the police and concerned persons to report the matter to CWC. In case of vulnerable persons, the committee can investigate the matter. The Committee will notify and keep IDEAS management informed of the progress of investigation of all alleged child and vulnerable person abuse cases and within period of 90 days from the date of reporting of a case.

### **A. Protection Officer**

The protection officer coordinates the tasks of protection envisaged by this policy in the institution and works in close collaboration with the Principal/Head of the institution. S/he will also be the focal point for the Protection Committee to receive complaints.

#### **Scope of responsibilities:**

- S/he should assume responsibility to ensure that the Safeguarding Policy is adhered by IDEAS personnel and partners.
- S/he ensures that any breach of the Policy is promptly reported.
- S/he looks after the protection and safety of children, vulnerable persons, and young people.

#### **Responsibilities:**

1. S/he reports any breach of the Code of Conduct for persons covered under the scope of Safeguarding Policy
2. S/he is personally available and maintains an environment that encourages individuals in disclosing /reporting any allegation of above behavior especially of a sexual nature.
3. S/he ensures the protection, immediate care, and attention for all such individuals involved in reporting or witnessing of the incident.
4. S/he ensures the confidential and safe custody of all original handwritten notes signed and dated along with all typed/printed reports.
5. After the initiation of the enquiry by the Protection Committee, when a child or vulnerable person has to be interviewed, Protection Officer will seek professional help if in-house capacity is unavailable. Special care is to be taken while interviewing children and/or vulnerable persons with intellectual or psychiatric disability.
6. The Protection Committee has the discretion to close the matter if there is no cooperation from the complainant or there is no sufficient reliable information, upon notification to IDEAS management.
7. Only upon authorization from the Protection Committee and IDEAS Management, the Protection Officer may report to legal authorities or initiate any investigation.

#### **Secretary**

A secretary is appointed from among the members of PC and shall record minutes of the meetings, its deliberation, and decisions as well as other relevant matters or actions of the Committee.

### 5.3. Procedures for Reporting and investigation

- Any instance of child or vulnerable person abuse comes to the notice of the project staff it should be furnished to the Committee. They shall examine any person if they find necessary to ensure justice to the child or vulnerable person.
- Once the complaint of child or vulnerable person abuse is brought to the notice of the Committee, they should proceed with the enquiry irrespective of complainant wish to withdraw the same or the alleged abuser fails to co-operate, and shall arrive at a finding.
- When the complaint of child or vulnerable person abuse or child or vulnerable person exploitation received by the Committee, they shall ensure that child or vulnerable person shares it with the person with whom she/he feels free to put the child or vulnerable person at ease.
- The Committee should intimate information of abused child or vulnerable person within 24 hours to child's or vulnerable person's parents or guardian.
- The Committee shall----
  - Inquire into alleged cases of child or vulnerable person abuse in projects or staff, including volunteers or visitors to the project.
  - Recommend action against the abuser in conformity with prevailing laws and for the rehabilitation of the abused child or vulnerable person.
  - Opportunity to be given to hear from the abuser before making any decision. The Committee should set specific time for the alleged abuser to submit his or her response.
- The inquiry of child or vulnerable person abuse or exploitation cases should be completed within one month and not later than three months of having information regarding case.
- The decision of the Committee should be reasoned and recorded in writing, and the copy of it need to forward to the President of NGO, the child or vulnerable person (through parents) and the alleged abuser.
- The records of the enquiry to be treated as confidential, the Committee members are liable for breach of confidentiality.
- The records of the enquiry should be preserved by the NGO.
- In case of dismissal of a complaint on completion of inquiry no coercive steps should be taken against the child or vulnerable person who had complained.

#### 5.3.1. Disciplinary Action

Following actions must be taken depending on the findings of the inquiry report of Protection Committee recommendations:

- Warning letter
- Suspension with or without pay.
- Withholding one time
- Transferring or change of profession.
- Termination of service
- Mandatory reporting to civil authorities

#### Where accused is found guilty of the offence:

If the inquiry by the Protection Committee comes to the finding that the said allegation of commission of an offence against the accused is proved, the Protection Officer shall take appropriate action depending on the nature and gravity of offence and damage caused to the victim. Where a accused is found guilty of a grave act of sexual offence, his /her services are terminated immediately without

prejudice to the existing laws. If the offence calls for mandatory reporting to the police, the Protection Officer shall do the same within the reasonable time.

#### **Where accused is not found guilty of the offence:**

Where the accused person is found innocent, all charges are dropped, and a note made in his/her personal file to that effect. Complaints that are made maliciously or with mala fide intention shall warrant strict disciplinary action by the Protection Officer including a fine to the extent of Rs. 10000/- which shall be paid to the accused through the medium of the Protection Officer.

#### **5.3.2. The Ombudsperson**

The cases of abuse and maltreatment noticed at the management level or in the protection team, the Ombudsperson who is out of NGO will be appointed by the board members to resolve the case. The protection officer is responsible to inform the Ombudsperson. The Protection Team should involve the Ombudsperson in the investigation and seek legal counsel in assessing conduct that could be relevant in criminal proceedings. The Ombudsperson should be expert in handling the cases.

#### **5.4. Other functions of the Protection Committee**

The PC has a key role to play in the continuous improvement of Safeguarding Policy and practice. The following functions relate directly to this key role including the following.

- Facilitate simple complaint reporting mechanisms at IDEAS at all levels of operations (national and state offices) and partners.
- Facilitate counselling to the victim child or vulnerable person and family as part of its moral responsibility.
- PC will design, develop, publish, distribute, disseminate, implement, and regularly review and evaluate clear and robust organizational and partners' child and vulnerable person safeguarding policies, procedures, protocols and guidelines.
- Encourage partners and agencies (including the donor) to have in place their own up to date safeguarding policies, procedures and protocols, guidelines, and other relevant materials.
- Ensure all partners and agencies have robust whistle-blower's policy in place and that these are sufficiently disseminated and understood by all practitioners and managers.
- Ensure Safeguarding Policy, procedures and protocols, and guidelines are developed around agreed key issues of child and vulnerable person protection including children and vulnerable persons with disability, trafficking, child and/or vulnerable person sexual abuse, children and vulnerable person s in disaster situations, online and mobile phone safety and children and/or vulnerable person s and young people who are missing etc.
- Publish, publicly display and regularly review IDEAS's Safeguarding Policy, which must reflect national and local policy developments and the arrangements.

## **6. Mandatory Partnership requirements and Standards**

### **6.1. Requirements concerning Partner Organizations**

IDEAS will develop an Organizational Protection Checklist to assess the needs of policy formation and implementation.

IDEAS's Code of Conduct requires all her Partners to comply with the following protocols:

1. Sign and adopt IDEAS's Safeguarding Policy at the time of entering partnership, and be guided by the Policy in developing their own institutional Safeguarding Policy and systems respectively, within the mutually agreed timeframe on priority basis.
2. Treat children and vulnerable persons with respect regardless of caste, gender, language, religion, political, national, ethnic, or social origin, disability, birth or other status and recognise their right to personal privacy.
3. Not engage in any form of physical (corporal) punishment to children and/or vulnerable persons, harassment, discrimination, physical or verbal abuse, intimidation, favouritism or exploitative (physical, mental, sexual) relations.
4. Ensure their actions are open and non-secretive with the child or vulnerable person; and they don't do things for children and vulnerable persons of a personal nature that they can do for themselves.
5. Ensure that her staff, associates, visitors keep safe and respectable distance when interacting with children and vulnerable persons; and refrain from expressing their affection by holding, kissing, embracing, cuddling, touching, or maintaining eye contact with a child or vulnerable person in an inappropriate, unnecessary, or culturally inappropriate manner.
6. Ensure that no child or vulnerable person is employed at office or providing any service to the office/staff through its vendors.
7. Ensure the staff, associates, visitors do not use inappropriate, offensive or discriminatory language/local slang or remarks when speaking with a child or vulnerable person or surrounded by a child or vulnerable person; and will never make suggestive remarks or gestures, even in fun.
8. Ensure that it is aware of situations that may expose child or vulnerable person to any protection and development challenges and threats and pro-actively develop strategies to create safeguards to protect the interests, safety and wellbeing of child or vulnerable person.
9. Dialogue with children and vulnerable persons in programme areas with adequate scope for receiving children's and vulnerable person's views on the decisions and actions taken on their behalf.
10. Comply with all relevant child or vulnerable person focused legislations such as the Juvenile Justice (Care and Protection of Children) Amendment Act, 2015, Protection of Children from Sexual Offences Act, 2012 (POCSO), Child Labour (Prohibition and Regulation) Amendment Act, 2016, Right to Education Act 2009, Prohibition of Child Marriage Act 2006, Immoral Traffic (Prevention) Act, 1956, Bonded Labour System (Abolition) Act, 1976 including various provisions regarding children in the Indian Constitution. These laws and the policy on children, are based on the United Nations Convention on the Rights of the Child 1986, which form the foundation of child rights and protection.

## **6.2. Standards for Child and Vulnerable Person Protection for Partner Organizations**

### **A. Elements of a Safeguarding Policy:**

A Safeguarding Policy should contain at least the elements, as entailed in IDEAS's Safeguarding Policy. The partners are required to publish and put up its Committee members' names, contacts details and complaint box in a safe and accessible location within its premises

### **B. Child and Vulnerable Person protection within programs and projects**

It is ensured that project work contributes to protecting children and vulnerable persons both in the project itself as well as in its environment from abuse or maltreatment and that cases of abuse and maltreatment are prosecuted in a cultural and legal context.

### **C. Participation and empowerment**

It is ensured that children and vulnerable persons are involved in devising and implementing child and vulnerable person protection activities. Within their Safeguarding Policies and their project proposals. NGO will adhere to empower children and vulnerable persons to protect themselves from abuse and maltreatment. It will be carried out by educational and awareness-raising measures for parents, teachers, community members and other relevant stakeholders.

### **6.3. Declaration of Commitment of Partners (to be signed and submitted to IDEAS)- Annexure 3**

## **7. Policy Audit and Feedback Mechanisms**

### **7.1. Review the Safeguarding Policy**

IDEAS is committed to the ongoing policy audit and feedback mechanisms on protection procedures and behavior protocols. Annual staff evaluations will include active listening, activities and behavior that empower partners, assertiveness when advocating for children and vulnerable persons, and basic knowledge on child and vulnerable person protection issues. Periodic reviews will be conducted to assess the trends, challenges, and learnings to achieve highest possible standards for protection in IDEAS.

### **7.2. Establishing ongoing feedback and learning process**

Annually, through institutional processes and platforms the staff will have the opportunity to share their learnings, challenges, self-appraise their conduct and concerns on child and vulnerable person protection. In the event of any concern, these should be raised with the Director/ Protection Committee.

### **7.3. Child and Vulnerable Person inclusive and responsive programmes**

IDEAS will ensure that child and vulnerable person protection measures are integrated in main project designs, and children's and vulnerable person's and their parent's/care takers expression of views within projects are facilitated and recorded for adaptation and effectiveness.

Sahaya Philomin Raj SJ

Director

23 July 2022

## ANNEXURE -1

### Possible Indicators of Abuse

<p><b>Physical Abuse</b>  <i>Possible physical signs:</i></p> <ul style="list-style-type: none"> <li>▪ Bruises, bruising which looks like hand or finger marks, burns, cigarette burns, scalds, sprains, dislocations, human bites, cuts</li> <li>▪ Injuries that the child and vulnerable person cannot explain or explains unconvincingly</li> <li>▪ Untreated or inadequately treated injuries</li> <li>▪ Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen</li> </ul> <p><i>Possible behavioral signs</i></p> <ul style="list-style-type: none"> <li>▪ Becoming sad, withdrawn or depressed</li> <li>▪ Having trouble sleeping</li> <li>▪ Behaving aggressively or being disruptive</li> <li>▪ Showing fear of certain adults or children and vulnerable persons</li> <li>▪ Fear of returning home or of parents being contacted</li> <li>▪ Showing lack of confidence and low self-esteem</li> <li>▪ Being very passive and compliant</li> <li>▪ Using drugs or alcohol</li> </ul> <p>Chronic running away</p>	<p><b>Sexual Abuse</b>  <i>Possible physical signs</i></p> <ul style="list-style-type: none"> <li>▪ Pain, itching, bruising or bleeding in the genital or anal areas.</li> <li>▪ Genital discharge or urinary tract infections</li> <li>▪ Stomach pains or discomfort walking or sitting</li> <li>▪ Sexually transmitted infections</li> </ul> <p><i>Possible behavioral signs</i></p> <ul style="list-style-type: none"> <li>▪ A marked change in the child's and vulnerable person's general behaviour. Unusually quiet and withdrawn, or unusually aggressive.</li> <li>▪ Showing unexpected fear or distrust of a particular adult/s or children or vulnerable persons.</li> <li>▪ Child or vulnerable person starts using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age.</li> <li>▪ The child or vulnerable person may describe receiving special attention from a particular adult or refer to a new "secret" friendship with an adult or young person.</li> </ul>
<p><b>Emotional Abuse</b>  <i>Possible signs:</i></p> <ul style="list-style-type: none"> <li>▪ Physical, mental and emotional development is delayed</li> <li>▪ Highly anxious</li> <li>▪ Showing delayed speech or sudden speech disorder</li> <li>▪ Low self-esteem</li> <li>▪ Inappropriate emotional responses to painful situations</li> <li>▪ Extremes of passivity or aggression</li> <li>▪ Drug or alcohol abuse</li> <li>▪ Chronic running away</li> <li>▪ Compulsive stealing</li> </ul>	<p><b>Neglect / Negligent Treatment</b>  <i>Possible signs:</i></p> <ul style="list-style-type: none"> <li>▪ Dressed inappropriately for the season or the weather (exposure symptoms might include recurrent colds, pneumonia, sunburn, frostbite, etc).</li> <li>▪ Poor personal hygiene</li> <li>▪ Is inadequately supervised or left in the care of an inappropriate care giver.</li> <li>▪ Untreated medical problems</li> <li>▪ Frequently hungry</li> <li>▪ Is malnourished (this may be seen as being undersized, having low weight and a sallow complexion, lacking body tone, and being constantly tired).</li> <li>▪ Frequent lateness or non-attendance at school</li> <li>▪ Untreated medical problems</li> <li>▪ Compulsive stealing</li> <li>▪ Drug or alcohol abuse</li> <li>▪ Low self esteem</li> </ul> <p>Poor social relationships</p>

**Note:**

- ✓ A child or vulnerable person may be subjected to a combination of different kinds of abuse.
- ✓ It is also possible that a child or vulnerable person may show no outward signs and hide what is happening from everyone.
- ✓ This is only a suggestive list not a comprehensive list. The child or vulnerable person could always come up with any other behavior – the caretakers/guardians need to observe the child or vulnerable person carefully.

## ANNEXURE-2

### COMPLAINTS REPORTING FORMAT

#### **Part I- About You (Informant)**

Name: .....

Your Role in IDEAS.....

Details of any other organization involved.....

Your relationship to the concerned child or vulnerable person .....

(Your identity as an informer will be kept confidential. In spite of that if you may, for personal reasons, not want to disclose your identity, you are requested to cooperate fully in sharing the rest of the following information.)

#### **Part II-About the child or vulnerable person.....**

Sex.....

Age.....

Address.....

Who does the child, vulnerable person or young person live with?.....

#### **Part III-About your concern**

Please give as much detail as you can regarding your concern of abuse or danger to a child or vulnerable person. Eg of details could be related to

- a) Did the child or vulnerable person disclose abuse?  
.....
- b) Was abuse observed or suspected?  
.....
- c) Nature of concerns/allegation  
.....
- d) Date, time, & place of any incident(s)  
.....
- e) Observation made by you (Child's or vulnerable person's Emotional status, physical evidence)  
.....
- f) Write down/share exactly what the child or vulnerable person said and what you said  
.....
- g) Any other relevant information  
.....
- h) Were other children or vulnerable persons involved, aware?  
.....
- i) Have you reported this to the parents or caregiver or any other protection personnel or agencies?  
.....
- j) Time and date of reporting  
.....
- k) Person(s) to whom report was made  
.....
- l) Advice given  
.....
- m) Action taken.  
.....



**Alleged Perpetrators details: (complete as much as possible if known)**

Name: \_\_\_\_\_  
Nationality \_\_\_\_\_

Address/Current Location:  
\_\_\_\_\_

Language/s spoken \_\_\_\_\_ Age: \_\_\_\_\_ Sex: Male/Female Relationship to victim:  
\_\_\_\_\_

Occupation: \_\_\_\_\_ Employer  
\_\_\_\_\_

Any other details (including physical description):

**Current Safety of the child or vulnerable person?** (Include any immediate safety concerns such as access of perpetrator to the safety within the family, any emergency needs)

**Has any emergency medical or other support been required? If so what was provided, when and by whom?**  
(Include any immediate safety concerns such as access of perpetrator to the safety within the family, any emergency needs)

**Does the report or presentation of the child or vulnerable person (if present) suggest emergency medical attention is needed?**

**Who else knows?** (e.g. other agencies, family members, other individuals)

**Actions taken to date?** (e.g. referral to the police, social welfare etc)

**Completed by (name and sign):**

**Date** \_\_\_\_\_

**Signed by (Informant):** \_\_\_\_\_

**Date** \_\_\_\_\_

### **Annexure 3**

#### **Declaration of Commitment**

(Committee members, Board of Directors, members, staff, volunteer, visitors and partner organizations)

I have carefully read the Code of Conduct and discussed its contents with others in the organization in order to understand it clearly. I commit to comply with the Safeguarding Policy of IDEAS, and I am aware that the organization expects me to uphold at all times the standards of behavior described in the Code of Conduct.

I also understand that non-compliance can result into termination of my service with IDEAS.

I declare that:

1. I have read and understood the Safeguarding Policy of IDEAS and have attended/will attend the child or vulnerable person protection training organized by IDEAS.
2. I will work within the procedure as laid out in the IDEAS Safeguarding Policy.
3. I have not been accused or convicted of any offence involving physical or sexual abuse of children, vulnerable person or young people.
4. I understand that if a complaint is brought against me regarding the abuse of children and vulnerable persons while engaged in IDEAS activities, the allegation will be thoroughly investigated in cooperation with the appropriate authorities.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

(A copy will be kept on file of the Director of IDEAS).