



**Development Research Communication and Services Centre**

**CHILD SAFEGUARDING POLICY**

**Safeguarding children from any form of abuse & maltreatment**

Date	Lead	Date of Review
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## 1. INTRODUCTION

DRCSC is a non-government development organisation working in 12 districts of West Bengal and other states. As an organisation, we strive to assist marginalised rural communities in attaining food and livelihood security through sustainable management of natural resources. The organisation's decisions are based on principles and actions that are environment friendly, economically appropriate, socially just and arrived at by mutual cooperation. In its direct work with children and schools, the organisation strives to promote environmental awareness and activity-based participatory learning among children and adolescents and to encourage them to understand and appreciate climate justice. We directly work with schools (Primary, upper primary, High school and ICDS) in rural and urban areas. Part of our work with children and schools is also focused on ensuring quality education and effective RTE implementation in schools, creating a child-friendly environment, and promoting awareness of child rights.

DRCSC is highly sensitive to its role concerning children and prioritises their safety and well-being. This approach is founded in DRCSC's commitment to child rights stemming from the United Nations Convention on the Rights of the Child (UNCRC), of which India is a signatory.

### Purpose

DRCSC believes that the child's rights and well-being are critical and that all children have the right to protection from exploitation, harm or abuse. DRCSC has formulated a Child Protection Policy to reaffirm its commitment to 'No harm to children'. This policy is drawn from DRCSC's Philosophy, Mission, Vision and approach to working with children. The policy firmly upholds a 'zero tolerance' approach to abuse, exploitation or safeguarding violation while also focusing on avoiding risks, reducing harm, and supporting children and families. The policy may also serve as a tool for advocacy to improve community and household awareness of child protection. The policy implementation includes an internal system for regular and comprehensive risk identification and management, reporting and redressal of safeguarding violations.

### Scope

This policy applies equally to everyone working or related to DRCSC regardless of their role or position in the organisation and includes:

- The Society Executive Committee/ General Body members (DRCSC)
- All staff members of DRCSC (full-time, part-time)
- Associated personnel engaged with work or visits related to DRCSC activities, including but not limited to: Auditors, Trainers, Partners, Consultants, Volunteers, Contractors, and Suppliers; and program visitors, including but not limited to Donors, Government Officers, Journalists, Staff relatives, Researchers and Politicians

All individuals associated with the policy must comply with the policy requirements and know the consequences if they fail to do so.

### Review & approval

This policy will be reviewed, approved and endorsed by the DRCSC Society members every two years or when there are changes in applicable legislation and regulatory guidance.

## 2. DEFINITIONS

### *Who is a child?*

As per the UN Convention on the Rights of the Child (Article 1), a child shall be any person below the age of 18 years.

### *Risk*

In the context of child safeguarding, risks may be defined as the probability of harm, abuse, exploitation, or any other negative incident because of internal (within the organisation) or external (outside the organisation) vulnerabilities.

### *What is Child Abuse?*

'Child abuse' or 'maltreatment' consists of '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).

*Types of abuse:* Physical abuse, Sexual abuse, Emotional abuse, neglect and negligent treatment, Sexual and commercial exploitation (For details, See Annexure)

### *What does Child Safeguarding mean?*

All children have the right to be safe and feel safe, not considering their age, gender, ability, race, or sexual orientation. DRCSC sees itself as a direct implementing organisation whose work and personnel have a direct link and capacity to impact children and young people. Accordingly, it accepts its responsibility for protecting children and young people from all kinds of harm arising from the actions of the organisation or its related persons.

Safeguarding actions include any steps that an organisation may take that come under the category of proactive measures. Such measures also include ensuring that policies, procedures, and practices are in place to promote the well-being and protection of children from abuse or harm.

Safeguarding measures include

- All organisational members are vigilant towards various risks and make constant efforts for risk mitigation.
- The organisation has an easy-to-understand and approachable mechanism for reporting concerns or violations.
- There is a working system for effective and timely redressal of safeguarding violations and
- The organisation takes steps to provide support to any child facing any form of harm, abuse or neglect.

### *Who shall be the Designated Safeguarding Person (DSP)?*

DRCSC shall appoint a Designated Safeguarding Person for the organisation who shall receive safeguarding complaints or concerns from all projects and geographical areas, record and acknowledge them, and forward these to the Central Safeguarding Committee. He/ she shall also be responsible for the recordkeeping, documentation, and safekeeping of documents and personal information related to children. The DSP shall set up meetings, ensure an appropriate quorum, document decisions and play an administrative role in all safeguarding processes as required.

### *Central Safeguarding Committee*

DRCSC shall have a central safeguarding committee to oversee the implementation of its safeguarding policy. The Central Committee shall have representation from various projects and senior leadership involvement. This committee will be responsible for effectively redressing serious concerns and complaints.

### *Local Complaint Handling Committee (LCHC)*

DRCSC shall have multiple Local Complaint Handling Committees, selected per the various geographical areas where the organisation has its projects and community engagements. The Local Complaint Handling Committee shall have the participation of individuals from multiple departments/ projects. This committee will serve as the first line of complaint for children and the community. Any

complaints received by the Local Complaint Handling Committee shall be immediately forwarded to the Designated Safeguarding Person and, after that, to the Central Safeguarding Committee. The Local Complaint Handling Committee shall take steps to support children and families that require specific assistance and liaise with ground-level organisations and the child protection system as need be.

### 3. GUIDING PRINCIPLES

DRCSC’s child safeguarding policy is made up of four fundamental principles:

<b>Best Interest of Children</b>	DRCSC strongly believes in the Best Interest of Children, esp. in the context of any decision-making involving children. Here, the organisation shall also be guided by section 2(9), Juvenile Justice (Care and Protection of Children) Act 2015, “the basis for any decision taken regarding the child, to ensure fulfilment of <b>his/her/other</b> basic rights and needs, identity, social well-being and physical, emotional and intellectual development”.
<b>Confidentiality</b>	Children have a right to privacy and confidentiality. Any personal information, data, photographs, audio and video collected for official use shall only be done as per organisational communication guidelines. Under the policy, any information on safeguarding concerns shall be shared only on a need-to-know basis (only those who require the specifics for case redressal). This principle shall also apply to the respondent (or person against whom the complaint has been filed) regarding the case investigation and redressal. The confidentiality principle shall not be used to avoid legal reporting of safeguarding violations (incidents under the POCSO Act, 2012, Juvenile Justice Act, 2015 and IPC). Anyone who wishes to raise a safeguarding concern without sharing their details (anonymous reporting/whistleblower) may do so. All of this will help build an open and safe environment and a culture of reporting and being vigilant.
<b>Safeguarding Culture</b>	DRCSC believes in an open culture where individuals, communities and children feel comfortable raising issues and discussing safeguarding concerns. Anyone can seek organisational intervention to make the communities and workspaces safe for all children.
<b>Children’s rights are not only protected but also enabled</b>	DRCSC believes that children need an enabling environment to exercise their right to participation and develop their agency as rights holders and citizens. The organisation shall empower children to be risk aware and understand the reporting and redressal processes w.r.t the policy.

### 4. POLICY FRAMEWORK

#### 4.1. Recruitment and Induction

As an organisation based on social justice, inclusion and participation values, DRCSC’s recruitment processes are non-judgmental and non-discriminatory. All deserving candidates (internal and external) shall be given equal opportunity regardless of gender, creed, race, ethnic origin, disability, HIV identity, marital status, sexual orientation, or being a member of a minority group.

At the same time, DRCSC will take the following steps to ensure that selected candidates undergo adequate background verification / past experience checks, especially for positions directly working with children.

- 4.1. Selection procedure – During initial selection, the HR/ selection team will scrutinise candidate CVs closely to identify any red flags such as previous termination/ being asked to leave, lack of appropriate reference from a previous employer, etc. During the personal interview, the candidate can be asked to give more details about these. Further questions may include other competency aspects such as the candidate’s experience and aptitude, interest, and previous work with children.
- 4.2. Reference Check: A detailed reference check with at least two candidate-provided references will be undertaken. Both written or telephonic reference checks shall include questions on the candidate’s previous conduct, engagement with children, prior incidents, and attitude and values.

These will supplement the reference checks and provide information about the candidates' quality of work, competencies, teamwork and alignment with organisational values.

- 4.3. The signing of the Code of Conduct – DRCSC, as an organisation, shall ensure that, at the time of joining, all staff members, volunteers and interns sign the Child Safeguarding Policy along with the Code of Conduct. Doing so will act as a binding commitment for staff members and related persons. It also ensures that all individuals agree with and are committed to following all safeguarding policies and procedures in their professional and personal interactions with children.
- 4.4. DRCSC will ensure staff and related persons' experiences and exposure to safeguarding issues are noted and discussed during their performance appraisal.

## 4.2. Prevention

### 4.2.1. Training, Capacity Building and Policy Dissemination

<b>Training</b>	<p>DRCSC shall organise regular training specifically designed for the following sets of internal and external stakeholders</p> <ul style="list-style-type: none"> <li>- Initial orientation/ induction training for all staff members (on child safeguarding, code of conduct, risk recognition and vigilance, responsibility to report, reporting and redressal basics)</li> <li>- Senior leadership/ EC Committee orientation on policy and their role in policy oversight, decision making and appeal process</li> <li>- Designated Safeguarding Person/Decentralised and Central Safeguarding Committee (on child safeguarding, policy implementation details, investigation, redressal process, documentation and risk registers, community engagement)</li> <li>- Community and children (information and awareness on child rights, safeguarding basics, risks and concerns, reporting and redressal procedures)</li> </ul>
<b>Dissemination</b>	<ul style="list-style-type: none"> <li>- DRCSC shall ensure that the safeguarding policy is available to all staff members, all locations/ offices, on the organisational website and in the manual of policies</li> <li>- Safeguarding and reporting information shall be shared with stakeholders via posters and communication materials. This clear availability of information will demonstrate the organisational safeguarding commitment to all staff members, related persons, community members and children.</li> </ul>

### 4.2.2. Ensuring a Culture of Openness and Transparency

DRCSC values include participation, transparent and open decision-making, and social justice. In alignment with these values, the organisation shall build and preserve a culture of openness and transparency. In the context of child safeguarding, employees, related persons, communities, and children should believe that the organisation will take all safeguarding concerns seriously. These mechanisms will give them the confidence to report any incidents or suspicions.

### 4.2.3. Organisational Code of Conduct

1. All individuals covered by the policy shall commit to and abide by the organisational code of conduct (Annexure 2)
2. A specific note and code of conduct has been prepared for visitors (including but not limited to Donors, Government Officers, Journalists, Staff relatives, Researchers and Politicians) who will interact with the community (may or may not include children) (Annexure 3)
3. A brief note and code of conduct has been prepared for Media and related persons who may prepare or publish any content about the organisation/ interact with communities (including children)

## 4.3. Programme Design and Intervention

### 4.3.1. Risk Identification, Assessment and Mitigation

DRCSC takes the process of risk identification, risk mapping and assessment and risk mitigation very seriously, especially regarding the risks in the context of child safeguarding. The organisation shall

- a) Set up a risk assessment system for the organisation to identify risks related to safeguarding. The

risk register shall record the significant risks faced by DRCSC and the steps taken by the organisation to avoid, prevent or manage the risks. The risks could be further classified into programme or operational risks, activity or project risks, people risks, infrastructure risks, etc. The risk assessment and mitigation system are detailed in Annexure 4.

- b) Conduct a regular risk assessment exercise for all projects. Ensure that a safeguarding team representative is involved in the program design phase. The team inclusion and holding the pre-design exercise session will help design projects that are built on the premise of safe programming. They assist in replacing high-risk activities for those with reduced risk levels. Finally, assessing risks at the project level also helps set up the team's accountability.

#### 4.3.2. Community Engagement for an enabling environment

DRCSC has a rights-based approach that focuses on empowering women and children and their participation and involvement in decision-making. Sessions with community members, parents, and children would focus on sensitisation on child rights and gender issues for the empowerment and agency of children.

#### 4.4. Data & communication management

The organisation shall have strong guidelines on internal and external communication. All personal data, information, photographs, videos and any other content regarding children shall be collected only with due consent and stored with persons with the highest clearance levels. Such data and information shall not remain on the personal devices of staff, visitors, etc. and will not be shared via their personal social media accounts.

The guidelines shall encompass the following aspects: Consent for data collection, taking or recording; preparation of communication materials; data management (including storage devices, duration of storage, safe transfer, and backup; removing victim/ respondent's personal data before public sharing, uploading personal information, pictures and videos on social media platforms; staff and children's understanding on Online Safety.

**Annexure 5** details the Data protection and communication guidelines that should be complied with by everyone covered under the scope of the policy.

#### 4.5. Implementation of the Policy

The HR and Central Safeguarding teams are the two essential pillars for the successful implementation of the safeguarding policy. The Roles and Responsibilities of key personnel have been detailed in Annexure 6.

### 5. COMPLIANCE MECHANISM

Having an organisation-specific reporting and redressal mechanism in the context of child safeguarding is essential. DRCSC has envisioned a multi-level reporting and redressal framework in this context, as elaborated below. Two specific entities shall act as the foundation of DRCSC's safeguarding implementation mechanism:

1. Designated Safeguarding Person
2. Child Protection Committee (Central and Local)

DRCSC very much believes in decentralisation. Since the organisation is present across multiple districts across West Bengal, it is impossible for a single team located centrally to look after the complaints and safeguarding concerns from all the locations. Hence, every district/ defined area shall have its own Local Complaint Handling Committee. There will also be a central safeguarding committee which will look into matters that

- a) are serious
- b) have to do with the conduct of a DRCSC staff/ related person,
- c) may require legal intervention

### 5.1. Reporting Details

Any person who comes to know of any safeguarding concern or violation is obligated/ mandated to report it to the Designated Safeguarding Person immediately. In doing so, any member within the scope of the policy shall ensure that details of the case, including any identifying details, are kept entirely confidential.

<b>What should be reported?</b>	Any suspected or alleged child protection violation Any disclosure of harm or abuse Any violation of the policy (including failure to abide by the policy)
<b>When to report?</b>	Reporting should be done immediately after the incident or as soon as possible after the information is received. Within 24-hour reporting is highly preferable. This is imperative, especially when the child may require immediate relief. Yet, it is crucial to report anyhow. There should be no hesitation to report because of the information delay.
<b>Who to report?</b>	DRCSC has a designated safeguarding person. The organisation also has multiple Local Complaint Handling Committees so that information from the community or any individual child can be shared with people they know and in whom they have confidence. The matter may be shared via the area program coordinator/Local Complaint Handling Committee member(s) A list of area-wise safeguarding teams, Designated Safeguarding Person and members of the Central Safeguarding Team is provided in Annexure 7. Suppose a safeguarding concern is raised against any reporting team member (i.e., DSP, Decentralised or Central Committee). In that case, the matter may be reported to the Head of HR/ Executive Committee member/ Head of the Organisation. If the concern is against an EC member or Head of the organisation, the matter may be reported to any other EC member.
<b>Steps to Reporting</b>	The report can be given in various forms: a) Face-to-face with precise details of the incident/ concern b) Complaint box where a written letter/ incident reporting form can be placed c) Complaint via telephone/ WhatsApp may be made directly to the DSP, whose phone number shall be shared across all projects and geographic areas d) Email complaints with specific details may be sent to cpoatdrcsc@gmail.com

### 5.2. Steps after Receipt of the Report

The Designated Safeguarding Person should

- Immediately share the report with the Central Committee (telephonically and by email) and forward the completed incident form (received from the complainant/local committee/ filled by DSP)
- Ensure that the confidentiality of all parties is maintained (i.e., the child/ children, the complainant/ whistleblower, the respondent or against whom the complaint has been made)
- In consultation with the central committee, arrange for any immediate relief/ support as needed by the child (per the child's situation).
- If the matter needs to be reported to the legal system, assist the on-ground team, the child and their family, and provide necessary support, guidance, or referral.
- Ensure all incident and case details are kept safe, protected and confidential.

Member of the Central Committee shall

- 1) Share the incident details with other Central Committee members
- 2) Inform members of the Senior Leadership who have been given a safeguarding oversight role
- 3) Set up an incident-related committee which will be responsible for case management and redressal



- 4) Take decisions related to
- a) involvement of an external agency
  - b) forwarding of the matter to the legal/ child protection system as the case may be

*Case Inquiry and Redressal Process*

<b>Steps to be taken</b>	<b>Details</b>	<b>Timeline</b>
<b>Immediate support &amp; safety</b>	Immediate support to the victim (if required) Medical support Removal of the child from the current environment Removal of the respondent (if considered harmful/ dangerous to child/ others)	- within 24 hours - within 24 hours  TBD
<b>Preliminary Assessment</b>	Central Safeguarding Committee	Conducted within three working days
<b>Detail sharing with authorities</b>	Referral to legal machinery (if required). The President of DRCSC will initiate appropriate legal recourse	Within 24 hours First Information Report (FIR) as per legal process
<b>Committee for inquiry</b>	Either the Central Safeguarding Committee or an ad-hoc committee with representation of central and local committee members as decided upon	Within one week from receipt of the incident form
<b>Inquiry process</b>	Based on the incident and case scenario	Within forty-five days of receipt of the incident form
<b>Decision and sharing of decision</b>	In case a complaint is found to be valid, the Central Committee may recommend any of the following: a) options for redressal/ resolution involving both parties b) options for counselling, training or other means of self-improvement for the respondent and due acknowledgement and support to the victim/ survivor c) disciplinary action as per service rules to be taken against the respondent d) a mix of the above	The timeline for decision-making and implementation of the decision (after the inquiry process is completed) shall be within one week after recommendations have been forwarded.
<b>Decision-making</b>	The committee has recommendatory powers. Hence final decision-making has to be taken by the senior management team/ Head HR/ Safeguarding committee member of the EC.	
<b>Complaint against SMT/ DSP/ Any other</b>	In case the matter involves key functionaries at the senior level or the Board, the case shall be taken up by other persons at a similar or higher level (after ensuring the individual's exclusion from the proceedings and the decision-making)	
<b>Appeal</b>	In case of an appeal against the decision, the rest of the EC Committee (excluding the safeguarding committee member) may take up the matter.	For appeal, the timeline shall be two weeks for consideration and the final resolution/ action.

## The Time Frame for Handling a Complaint

Complaint is recorded	within 24 hrs. of receiving
Complaint is acknowledged	within 24 hrs. of recording
Complaint is assessed	within 72 hrs of acknowledging
Complaint handled by Local / Central Level Complaint Handling Committee	as and when a complaint is assessed
Speak to the witnesses and validate facts from records, and other mechanisms	within one month of the complaint assessment
Involve external Child Protection Agency	as and when required, better within one month of assessment
Inquiry by Ad-hoc/ Central Committee	maximum within 45 days of assessment
Provide options for redress	as and when required
Provide counselling services	as and when required
Update the complainant	within 45 days of the complaint being assessed and also before the closure
Close the complaint (internally or via an external agency)	maximum of three months, except the legal ones

### Complaint Redressal



**ANNEXURE:**

**List of Annexures**

**Annexure 1: Definitions of Abuse**

**Annexure 2: Code of Conduct for Employees**

**Annexure 3: Do's and Don'ts for Visitors**

**Annexure 4: Risk Assessment & Mitigation System**

**Annexure 5: Data**

**Annexure 6: Roles and Responsibilities of Key Personnel**

**Annexure 7: Area-wise Composition of Safeguarding Committees**

**Annexure 8: Self-Declaration Form**

**Annexure 9: Research Consent Form**

**Annexure 10: Incident Complaint Form**

**Annexure 11: Inquiry Report Format**

**Annexure 12: Infrastructure-related Guidelines for Ensuring Safe Spaces for Children**

## **Annexure 1: Definitions of Abuse**

### **Child Abuse**

According to the World Health Organisation, “child abuse” or “maltreatment” constitutes “all forms of physical, 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 Report of the Consultation on Child Abuse Prevention). Child abuse has the same meaning as defined under Indian laws, including but not limited to:

- a) Juvenile Justice (Care and Protection of Children) Act (JJ Act);
- b) Protection of Children from Sexual Offences Act (POCSO);
- c) Prohibition of Child Marriage Act (PCMA);
- d) Child Labour (Protection and Regulation) Amendment Act (Child Labour Act);
- e) Immoral Traffic Persons Act (ITPA); and
- f) United Nations Convention on the Rights of the Child (UNCRC).

**Physical Abuse:** Any incident of use of physical force resulting in injury, pain, harm, or impairment

**Emotional Abuse/ Neglect:** the inability to provide for a child’s cognitive, emotional, psychological, or social development. It may also include repeated failure to fulfil the child’s emotional needs and may result in humiliating, ignoring or rejecting the child, leading to poor self-esteem.

**Sexual Abuse:** This may include direct or indirect involvement of a child in sexual activity. As per Indian laws, there is no concept of consent in the case of a minor (child below 18). A child may be forced, coerced, or misled into sexual activity. Direct sexual activity may include inappropriate touching, kissing, caressing or penetration, while indirect may include asking the child to see or be involved in a pornographic act (offline or online).

## **DRCSC Code of Conduct**

### ***Responsible Behaviour***

1. As a representative of DRCSC, I am aware of my duties and role in my professional capacity and as an individual and a social being. I am aware that my conduct and personal response to situations can impact the reputation of DRCSC. I promise to be mindful of my conduct and behaviour in the workplace and in my life outside the official work environment.
2. In my interaction with children, youth, co-workers, stakeholders and beneficiaries, I shall behave in a manner that is respectful of all persons regardless of their age, gender, caste, ethnic origin, language, sexual orientation, socioeconomic status or any other aspect. I will act honestly and fairly, show no favouritism, not take undue advantage of my role and position, and always uphold the organisation's values.
3. I will abide by all the national laws and organisational policies. I shall not behave in a way that puts my or my fellow team members' security, safety, health or welfare in danger. I will not engage in any unlawful activity or in one that is likely physically, sexually or emotionally harmful to any child. I will not give or receive bribes or promise goods or services related to my organisational position.

### **Safeguarding**

#### ***I will:***

#### **Respectful Behaviour**

1. Treat each child as an individual with their personal identity, irrespective of age, gender, language, caste, socioeconomic situation, or other status.
2. Listen to the views and opinions of children, their families, and guardians.
3. Use positive language in all my interactions with children.
4. Involve children in decision-making about activities, events, programmes and processes involving or impacting them.
5. Create a safe and inclusive environment for all children and their families.
6. Promote the rights, safety and well-being of all children in the organisation.
7. Ensure the confidentiality of children, especially when their personal information is taken or provided for any external use.

#### ***Preparation of a safe environment***

1. Ensure that appropriate physical and infrastructure safety measures have been undertaken before conducting any activity with children.
2. Ensure activities or discussions with children are conducted in open/ accessible spaces, with the possible involvement of parents or guardians.
3. Follow the two-adult norm when working with, escorting, or engaging with children.
4. For any official requirement, take children's and parents'/ guardians' consent before asking for any information, data, images or videos involving children. Inform the children and parents about the purpose and scope of any activity, the risks involved, and the mitigation measures undertaken.
5. Ensure all actions related to personal data collection (of a child and their family) are taken as per the organisational data and communication guidelines.
6. Ensure special measures are undertaken to protect younger/ highly vulnerable children (age/ gender/ disability/ any other)
7. Ensure that children know of their right not to participate in an activity.
8. Ensure that the child is free to withdraw the consent to be photographed/ filmed/ interviewed at any time. They may choose not to respond to questions or share specific data or information.

9. Ensure that children can talk freely at all points of time and that their voices are taken seriously.
10. Immediately report any failure to comply with or non-adherence scenarios under our Safeguarding policy.

### ***Physical, Sexual or Emotional Behaviour & Related Aspects***

1. Do not engage in any physical contact with the child. If required, shake hands in greeting rather than hugging, holding hands, or being in close contact with the child. The child should be the one to take the first step for such close contact.
2. Do not call, email, or have a 'special' relationship with any child apart from the communication required for the project/ organisational requirement.
3. Do not show inappropriate behaviour or use such language; do not be too familiar, criticise, embarrass, shame or humiliate the child, or take undue advantage of the child. Respect the child's discomfort or comfort in any action.
4. Do not physically hurt or harm any child in any way.
5. Do not invite the child to my home or take them out for a ride, to a restaurant, give gifts or special meaning items or try to have special activities, words or phrases that show personal rapport.
6. Do not touch, kiss, hug, or have sexual intercourse with a child. Do not bathe, dress, or groom children or be part of any other personal actions they can do independently. Do not enter a child's room or home alone with the child or be in any situation which may be difficult to explain.
7. Do not exchange or promise money, goods, or services for favours, including sexual favours or any other exploitative behaviour.
8. Not be party to or encourage actions such as child labour, marriage or trafficking. Report such instances immediately to the designated safeguarding person or central safeguarding team member for appropriate intervention by DRCS.
9. Immediately report concerns or allegations of any abuse as per our Safeguarding policy.

### ***I will never:***

4. Place a child at risk of harm or continued abuse due to my inaction (including failure to report a safeguarding concern).
5. Agree to or participate in illegal, exploitative, unsafe, or harmful activities.
6. Hit or physically attack a child in the name of discipline.
7. Use language or behaviour that is abusive, humiliating, sexually provocative or places a child at risk of abuse.
8. Use any software, technology, or images of videos to stalk, exploit or harass children or to access child pornography.
9. Make additional contact or spend time with any child apart from as part of my official role.
10. Take care of a child in activities that can be done independently (e.g., toileting, bathing, dressing).
11. During a field visit, spend time alone with a child; invite children to my place of stay without parental supervision; share a bedroom with or sleep near an unsupervised child/ren.
12. Be involved in any sexual activity with a child, including paying for sex.
13. Misuse my role or position to give special treatment, gifts or payment/ in-kind assistance to a child or another person related to a child to gain advantage or sexual favour.

### **As an official or staff of DRCS, I also commit myself to the following:**

- 1. Use DRCS information, funds and resources entrusted to me in a responsible and cost effective manner and to be accountable for all money, property, following the appropriate policy and procedural requirements.**

Resources and property include among others

- Money and other financial resources entrusted to DRCS

- DRCSC's assets like vehicles, computers, projectors, air conditioners, telephones, DRCSC office premises, Training Centres etc.
- Information & Photographs that is confidential and restricted concerning DRCSC and individuals
- DRCSC logo, name and compliance documents

**2. Facilitate the safety, health and welfare of all DRCSC employees, project participants, volunteers and contractual employees through my own behaviour.**

- I will behave in such a way as to avoid unnecessary risk to the safety, health and welfare of myself and others.

**3. Ensure that my personal and professional conduct is and is seen to be of the highest standards and in keeping with DRCSC's values.**

- I will treat all people fairly and with respect and dignity and recognise the professional opinion of others. I will be accountable for my own actions and will not use unequal power relationships for my own benefit.
- I will work with others in an open and participative way, cooperating both within and across teams to support the delivery of organisational outcomes and impacts.
- I will not use, or be in possession of, illegal substances on DRCSC premises or when representing DRCSC at external functions.
- I will ensure that my personal conduct does not compromise DRCSC's values and does not impact my ability to fulfill the role for which I am employed.
- I will not say or do anything that would damage the reputation of DRCSC or which may bring the development work into disrepute.
- I will try to maintain and will also encourage others to maintain the green rules – eg. (i) Save water. Do not misuse. (ii) Put off light, fan, AC, computer monitor etc while not in use. (iii) Practice paper less culture. Keep and transfer records electronically as much as possible. Encourage the practice of Reuse, Recycle, Reduce. (iv) Restrict use of plastic.
- Media coverage is vital in case of showcasing the success of our work, I will not give interviews or provide information to the media unless I have been specifically authorised to do so. I will not disclose information that is confidential or may be used to harm DRCSC or any individual. This does not apply to members of EC.
- I will not accept any gift or any remuneration from Governments, beneficiaries, partners, donors, suppliers and other persons, which have been offered to me as a result of my employment with DRCSC.
- I will not abuse my position as DRCSC employee by requesting any private service outside the legitimate scope of work or favour from others in return for any kind of assistance by DRCSC.
- I will not be involved in any sexually motivated behaviour directed towards any staff of DRCSC or Partner Organisation or beneficiary.

**4. Perform my official duties and conduct my private affairs in a manner that avoids conflict of interest, thereby preserving and enhancing public confidence in DRCSC.**

- My actions will be free of any consideration of personal gain and I will resist any undue political pressure in decision making.
- I will declare to my reporting authority about any financial, personal, family (or close intimate relationship) interest in matters of official business which may have impact on the work of DRCSC – employment or promotion, civil authorities, contracts for goods and services, beneficiary groups etc.
- I will comply with the DRCSC policies on Anti Bribery and Corruption, POSH, Gender Policy and other relevant policies in the conduct of my work.
- I will not pursue my political career or not hold any post of the political party while I am in employment contract with DRCSC.



**5. I will avoid involvement in any criminal activities and refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or exploitation, both in and out of work.**

- If I become aware of any form of illegal activity, I will make it known to the appropriate body.
- I will never knowingly engage in any exploitive, abusive or corrupt relationships and will take appropriate action if I become aware of them.
- I will not engage in activities that contravene human rights or that compromise the work of DRCSC.

The code is designed to act as a guideline, but does not cover every possible situation staff may face. Any situation in which staff members may be in doubt about issues covered under the code is to be discussed with the Secretary and needs to be brought to the notice of the EC.

I have read through this Code of Conduct and understand the relevant documents referred to in the document. I hereby agree to follow and commit to upholding the standards in this Code of Conduct.

I realise that any breach of the Code of Conduct can and may result in the termination of my contract and/or terms of the agreement.

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

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

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

## Do's and Don'ts for other stakeholder visiting projects (visitors/donors/interns)

Accompanying staff members must ensure that Visitors/ donors/ interns/ consultants/ data enumerators etc., visiting any project area with potential direct interaction with children have

- a) Received a briefing on the organisational safeguarding policy
- b) Signed the guidance form that shows their awareness of the critical aspects of the policy and their agreement to comply with it
- c) Have been introduced to the parental consent form, the organisational data and communication guidelines and shall ensure the privacy, dignity and confidentiality of children and families
- d) In case the visitors are expected to be in contact with children over some time, a background/ reference check shall be done beforehand

It is best if relevant documents are prepared in advance and safeguarding issues are part of any orientation sessions held for the team.

Do's	Don'ts
Please treat everyone with respect, regardless of their age, gender, maturity or disability.	Don't make fun of, sensationalise, or trivialise any child's situation, disability or unique condition.
Treat all children equally and positively. Keep the association with the child limited and transactional.	Do not single out any child for special treatment or favouritism.
Use language that is professional and courteous.	No unpleasant words, slang or degrading language
Ensure questions are civil, impersonal, and straightforward	Do not ask invasive questions or use words that impact the child or family's privacy and dignity
Questions should be neutral and non-judgmental and not leading questions. Encourage open communication without pushing the children in a specific direction.	Don't use the child's innocence to manipulate information. Do not make promises (such as for assistance) if the child agrees to share information.
Interactions with children should preferably be conducted in an open space. Avoid inappropriate behaviour with children.	Do not encourage, coerce or pressure children to misbehave with you or their peers.
Ensure all interactions with children are conducted under the supervision of the organisation's staff.	Avoid inappropriate physical touch or any physical intimacy that is not required. Do not spend time alone with a child during your visit unless explicit written approval has been obtained for a specific purpose from the Safeguarding Team.
Ensure the guardian/ staff of the child are present during any field visit, interview or close interaction with children, esp. during any visit to the community/ program space involving children.	Do not take a child out to a restaurant(s), cinema(s) or any other place unaccompanied by the guardian. Do not spend time with the child in a closed room or any such behaviour open to being misconstrued.

## Annexure 4: Risk Assessment and Mitigation System

### WHAT IS RISK

Risk refers to the probability or likelihood of any harm, abuse, or adverse event/ occurrence and the consequences emanating from such an occurrence.

### RISK ASSESSMENT

Refers to the steps taken by the organisation for identifying, analysing and evaluating risks based on their acceptability and the organisational capacity to manage the risks. The two concepts may be understood as follows. The first refers to the degree to which a risk is acceptable to the organisation after steps have been taken for its control or management. The second refers to the organisation's resilience or coping capacity.

To arrive at the organisation's overall risk management capacity, the organisation shall assess unit-wise risks. Hence, there will be a close examination of each geography, project, and activity to identify acceptable or tolerable risks vs risks that need to be avoided or prevented.

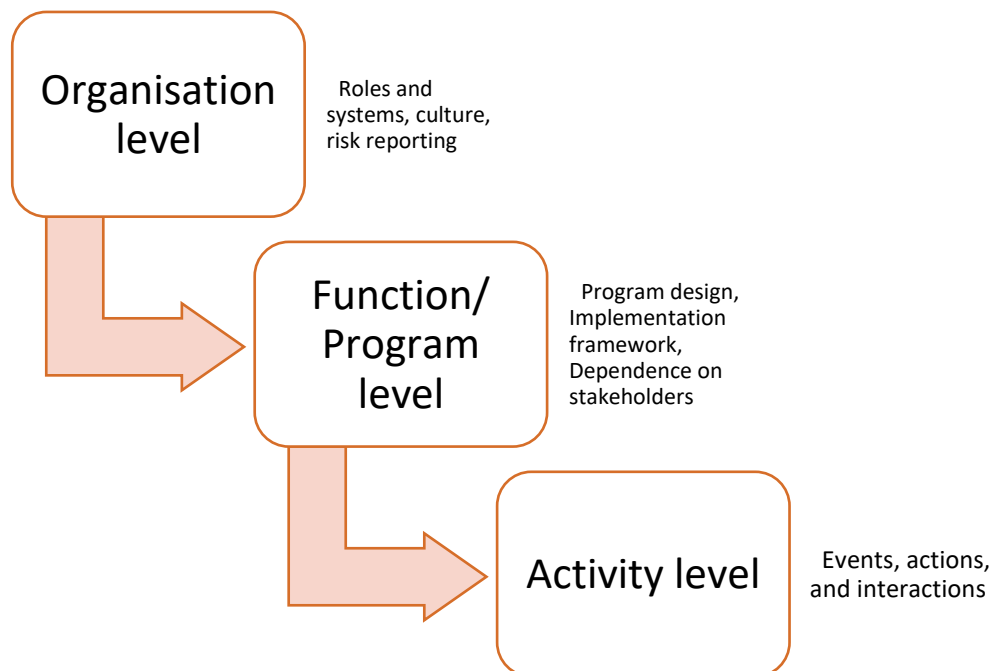
### RISK MANAGEMENT

An integrated risk management approach is critical for all organisations. The risk assessment and analysis processes, as stated above, are the intermediate steps required to arrive at the organisation's overall risk management approach. The next step after identifying and evaluating risks is risk mitigation or the steps an organisation could take to plan for, reduce, or manage risks. Here, the focus is on safeguarding related risks and their mitigation or management.

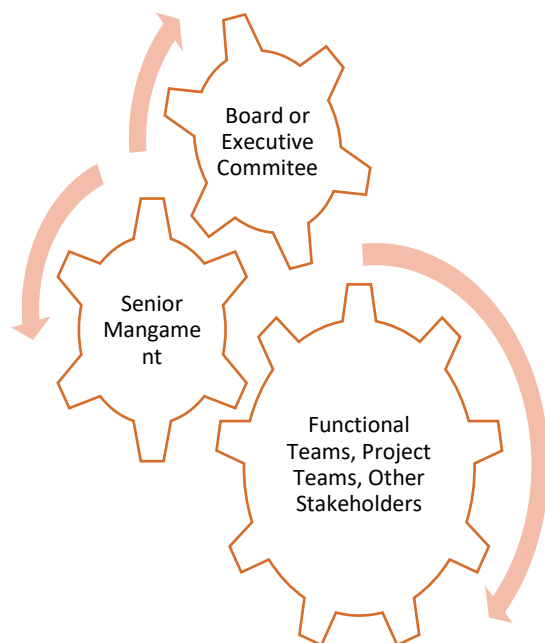
### RISK ASSESSMENT AND MITIGATION

Risk assessment and mitigation attempts to understand hazards (anything that could cause harm or loss), their potential to increase vulnerabilities, the scope for exposure (likelihood or possibility of occurrence), and strategies for prevention or control.

For risk assessment and mitigation to be comprehensive, the risk assessment process should be undertaken at regular intervals. This assists in understanding new or emerging risks, changes in the organisation's internal and external working system, and how it has resulted in changes in present safeguards.



**Organisational Level:** Safeguarding risks must be integrated into the organisation's risk register. The senior management shall review the organisational risk register once in six months and take requisite steps for risk mitigation. The decision and actions should be shared across the various governance levels, i.e., to the Board at the topmost level and to the functional and implementation teams for integration in on-ground processes.



**Functional-level** risk analysis should therefore be an essential part of program design and subsequent annual reviews, planning exercises, field monitoring, and assessments. This process cycle should also allow for newer, unanticipated risks observed or reported from the field to be reflected in organisational documentation and system-setting processes.

**Program Level:** This exercise should also be repeated for each project. Different projects are placed in varying geographies, work with diverse beneficiaries, and may occur at different times or under external circumstances. Thus, what is considered a risk in one project may not be mentioned in others. The risk register becomes truly functional and reflective when it is reviewed regularly. This way, the risk analysis and assessment process are incorporated within the overarching program design and implementation framework.

### Risk Integration in Program Cycle

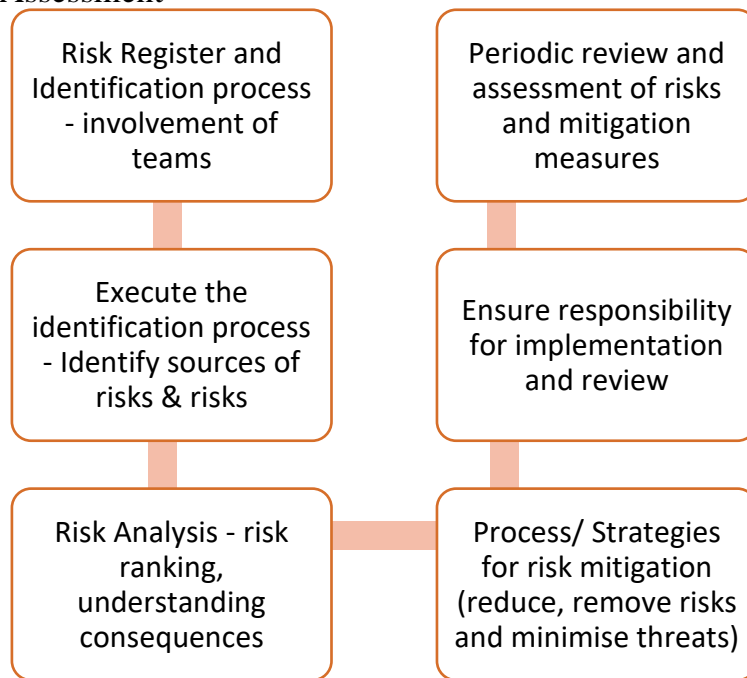
- The first phase of any program or project is the **design or conceptualisation phase**. A risk assessment here may assist the team in anticipating risks with their likelihood potential and taking critical steps for ensuring risk mitigation. In doing so, the team may change their strategy, replacing high-risk activities with others within the accepted tolerance level. This process reduces the pressure on the team to undertake high-risk activities and expend much energy on risk mitigation. Further, it helps teams understand the activities that require adequate attention and monitoring beforehand and ensure that boundary conditions are explained to everyone and strictly followed.
- During **program implementation**, teams' knowledge of risks to be avoided or mitigated is essential as they go through the steps – by – step execution. It also ensures that the accountability of risks is shared across the program team, with different individuals assigned responsibilities for potential risks and consequences. Finally, it also ensures emergency

preparedness and swift action, mitigating the adverse effects that might arise from a threat that could be avoided but not completely prevented.

Thus, Integrated Program Design and Implementation that incorporates Safeguarding concerns should, at the minimum, include

- Designated person/ role for risk assessment and reporting
- Integration of risk management and safeguarding across all stages in a program cycle
- Incorporation of safeguarding within program-specific Monitoring, Evaluation and Learning framework
- Incorporation of risk, risk reporting and mitigation in all periodic meetings of the program

### Steps to Risk Assessment



### RISK ASSESSMENT TEMPLATE

Name of Function/ Programme/ Event:	
Context of Assessment:	
Members in Risk Assessment:	Reporting to:
Date:	Place:

**Risk analysis tool**

Source of risk	Potential or Existing Risk	Likelihood of it happening High - 3 Medium - 2 Low - 1	Impact on the child/ DRCSC's reputation High - 3 (severe) Medium - 2 Low - 1 (negligible)	What mitigation measures are already in place	Mitigation Measures	Person responsible	Time by which action shall be taken

Date for subsequent review of risk assessment:

## **Annexure 5: Data and Communication Guidelines**

Organisations collect various types of data from the field, a significant amount of which may fall under personal information. This data collection may include but not be limited to the personal identifying details of the child, such as name, age, gender, family, school, village details, and socioeconomic information.

Further, organisations often use diverse mediums to communicate internally and externally about the child, whether to its funders, donors, external visitors, media professionals, the state and central government, etc. Social media platforms that communicate the organisation's work on the ground to the general public may also have personal information that may or may not impinge on the privacy and dignity of the child.

Finally, as the holder of such information, it is incumbent upon the organisation to take appropriate steps to safeguard the privacy and confidentiality of the child and to avoid such information from being leaked or shared for monetary gain by unscrupulous individuals who may use it for their own pleasure or gain. Thus, data storage, safekeeping, and secure sharing are critical, especially seen in the context of child safeguarding.

11. All personal information about any child and their family collected or shared with DRCSC during its work may be covered under these guidelines.
12. Staff members and associated persons named in the policy who have signed the organisational code of conduct shall abide by these guidelines. Failure to comply with the guidelines may be seen as a violation and result in appropriate action as detailed in the policy.
13. Permission to collect any personal or sensitive information about a child, including images, videos or stories of a child, shall be requested under specific conditions and only after explicit approval of the project holder or the organisation's senior management. The approval note shall include specifics such as
  - a) geographical and beneficiary profile for information
  - b) rationale and requirement of information collection
  - c) number and type of images/ videos/ stories required
  - d) external parties with whom the information is likely to be shared
  - e) internal accountability holder details (who will be responsible for data storage and management)
  - f) risks envisaged and steps that have been taken for mitigation of risks
14. Any personal information collected from a child (including identifying details, images, videos, and other information) may only be collected after due consent forms have been prepared and shared with the child's legal guardian and explicit consent has been received.
15. Images or videos taken with children should preferably be group pictures. Children should be dressed appropriately. They should not be asked to pose inappropriately or in a manner that is degrading, humiliating, or exploits their poverty or well-being scenario.
16. All forms of data (survey forms, excel sheets, pictures, videos, infographics) will only be retained in official organisational devices (desktops, laptops, tablets or cloud servers) in a password-encrypted format. Regular backups shall be taken of the specific folders to maintain data security. The accountability holder shall ensure data safety and security and be responsible for ensuring its safekeeping. The organisation shall provide due support as requested.
17. Data and images/ videos collected on staff personal devices shall be transferred to official organisational devices as soon as possible. Following data transfer and check, the data files shall be removed from all personal devices.
18. Staff members and associated personnel cannot share personal data/ information/ images/ videos of children from their personal social media accounts.
19. Explicit approval must be taken from project holders and senior management before uploading/ sharing any such data on the organisation's social media platforms.

20. All forms of data shared with external parties shall be free of information such as background, family and village details. Identifying information about the child shall be changed to maintain confidentiality or anonymised.
21. Use of personal data/ story/ picture/ videos shall be time-bound and mentioned in the consent form for approval from the parent/ guardian. All such data, including pictures and videos, shall be permanently deleted from the organisational devices, websites and other communication media at the appropriate time.



## Annexure 6: Roles and Responsibilities of Key Personnel

Role	Designated Safeguarding Person	Decentralised/ District Safeguarding Committee	Central Safeguarding Committee
<b>Composition</b>	Single person, appointed by the society	3-4 people such as the District Head / In-charge, a senior staff, a public servant / an NGO person who is an expert on matters related to children, a women member	5 member committee with Secrteray as an ex-officio member 2/3 staff from DRCSC 1/2 external members
<b>Responsibilities</b>	Liaison with all internal and external stakeholders Organise capacity-building sessions Provide information Prepare reports Lead risk assessment	Receive safeguarding concerns from community members and children Promote vigilance on safeguarding concerns in daily activities and on the field Promote a culture of openness and transparency Support community areas of concern w.r.t. safeguarding Reach out to local functionaries and the child protection system for support and referral (Village Level Child Protection Committee (VLCPC) or District Child Protection Unit (DCPU))	Central receipt point of all safeguarding concerns Ensure all processes and appropriate redressal of cases Reach out to external agencies for support Handle all safeguarding concerns w.r.t staff and related persons Lead role in enforcement/ implementation of safeguarding across the organisation
<b>Case-specific responsibilities</b>	Receive the complaints from all concerned Formal acknowledgement Filing & Documentation Organising meetings, calling all parties and witnesses	Receive complaints from the community, children and others Forward all cases to DSP as soon as possible Lead inquiry processes of community-based incidents	Receipt all complaints Handle all staff/ related person cases. Decision-making on which cases shall be handed over to an external agency/ child protection system. Provide all support to external agencies/ child protection system.
<b>Timelines</b>	Acknowledgement is to be shared within two days of receipt of the complaint/ concern. Forward any case received to Central Committee within 24 hours Reports to be filed annually Ensure committee meetings for incident management and redressal	Forward any case received to DSP (for documentation) within 24 hours Handling of community-based incidents (no staff/ related person involvement) to be completed within a fortnight of receipt In case an incident requires legal intervention, legal reporting timelines to be followed	

<b>Quorum</b>		At least 3 persons will make a quorum with compulsory attendance of external representative.	At least 3 persons will make a quorum with compulsory attendance of external representative.
<b>Decision-making</b>	No decision-making power	No decision-making power	Decision on disciplinary action to be taken in case a complaint is found to be true
<b>Reporting</b>	Central Committee, Executive Committee (for annual reporting)	Central Committee	Executive Committee

## Annexure 7: Area-wise Composition of Safeguarding Reporting Teams

### DRCSA Safeguarding Central Team:

Safeguarding Leads	Designation	Mobile Number	Email
Surja Kanta Das	<u>Safeguarding Focal Person</u>	<u>9432013247</u>	<a href="mailto:complainttodrcsc@drsc.org">complainttodrcsc@drsc.org</a>
Dilip Kr. Sarkar	<u>Ex-officio / Secretary</u>	<u>9432354324</u>	
Lucina Yeasmin	<u>Staff, DRCSA</u>	<u>9163952448</u>	
Mahua Chatterjee	<u>Psychologist, Counsellor</u>	<u>9903017656</u>	
Gargi Banerjee	<u>External NGO person, specialist from PRAAJAK</u>	<u>9830010395</u>	

### DRCSA Local Level Complaint Handling Committee

Safeguarding Leads	Designation	Region / District	Mobile Number	Email
Nibedita Singha	Convenor	Murshidabad	9780190813	<a href="mailto:niveditasingha1982@gmail.com">niveditasingha1982@gmail.com</a>
Hashibur Rahman	Convenor	Birbhum	9064210489	<a href="mailto:hasiburgp@gmail.com">hasiburgp@gmail.com</a>
Kaushiki Sen	Convenor	Purulia & Bankura	8250097383	<a href="mailto:koushikisen055@gmail.com">koushikisen055@gmail.com</a>
Soumita Mukherjee	Convenor	Howrah & Hooghly -	8981384166	<a href="mailto:soumitadrsc@gmail.com">soumitadrsc@gmail.com</a>
Debasish Samanta	Convenor	South 24 Parganas	9681193261	<a href="mailto:debasisbio007@gmail.com">debasisbio007@gmail.com</a>
Zia Ul Haque	Convenor	North 24 Parganas	9733570609	<a href="mailto:ziaulhaque33@gmail.com">ziaulhaque33@gmail.com</a>
Samir Nandi	Convenor	Kolkata	8116214360	<a href="mailto:samir.drsc@gmail.com">samir.drsc@gmail.com</a>

## Annexure 8: Self-Declaration Form

I have received and read through the child safeguarding policy of DRCSC. I have also gone through the code of conduct and the data and communication guidelines attached to the policy, which are essential for the policy's appropriate implementation.

I understand the role of the safeguarding policy in ensuring the well-being and protection of children across all pursuits of DRCSC. I am fully aware that any violation of the safeguarding policy would be seen as an act of indiscipline and can lead to disciplinary action as per the service rules of the organisation.

By signing this document, I commit to working with my colleagues and the organisation to uphold the mandated conduct standards as a critical objective of my service to DRCSC. A copy of the signed document will be filed in my personnel file.

I pledge to abide by the child safeguarding policy in my professional and personal conduct. I shall ensure the well-being of all children and, in doing so

- I shall consistently be risk aware and take actions to minimise risk to children
- I shall follow the code of conduct and ensure that my behaviour is aligned with the well-being of children.
- I shall adhere to the norms of communication and social media. I shall ensure all information, including pictures and videos, are taken with due consent of children and parents and stored, transferred and published safely and in the best interest of children
- I shall promptly report any suspicion, disclosure, or knowledge of any child protection violations.

Signature

Name:

Designation

Date

### Reporting Personnel:

**Designated Safeguarding Person:**

**Child Safeguarding Central Team**

Name	Email/ Number

**In case of any more details about the policy or any further clarification, please reach out to the xxx at xx@drcsc.org**

**Note: Please provide a copy of the self-declaration form to the person signing it and store it as part of the personnel file in soft or hard copy based on the existing practice.**

## Suggested Guidance for External Visitors

### Photographs

- We only take pictures and videos when required. This aligns with the DRCSC safeguarding norms of working in the field.
- If you must take pictures during the visit, please discuss this with the accompanying team member and request them to click and send you such pictures.
- Please do not share pictures without respecting the privacy and confidentiality of the children and being aware and mindful of the possible risk to children.
- Please do not share any field pictures with children on public platforms, including social media, as far as possible.
- Field photographs cannot be used for any publication or website without the written permission of DRCSC.

### Interaction with Children

- Do not ask any personal questions to the child.
- Do not exchange contact details; any future contact with the child may happen only for a specific purpose and will require the written approval of DRCSC and the child's parents/guardians.
- All interactions with children should be in the active presence of accompanying team members.
- Please keep the language friendly and positive. Do not probe into the child's personal or family circumstances unnecessarily. Please do not make any promises to the child or their family members.
- Avoid physical contact and hugs with children as far as possible

### Gifts for Children

- Any gifts given should be after discussion with the team member/DRCSC leadership.
- We encourage gifts that can be given to bigger groups instead of personal gifts to a few individual children

## **Annexure 9: Communication/ Data Collection Consent Form**

Consent letter for data/images/ videos/ case study collection from children (This format could also be used for data collection during MEL processes for any project)

1. In case of any case study/ information collection involving children, the organisation shall take the consent of the parent/ guardian.

2. Ensure that the parental consent form contains relevant details, such as

- Reason or purpose for case study/ data collection
- Where and in what format the data/ image/ video shall be used
- Where and with whom shall the data/ image/ video be stored
- Persons who will have access to the data/ images/ videos
- For what duration the data/ images/ videos will be available with the organisation

3. The parental consent process shall require the project team/ data collector to clearly state the above information orally to the possible participants and read the requisite form to them before they sign it. In specific cases, a written note may be shared with the parent/ guardian describing the purpose of data collection and the above elements.

If an external media person is involved in the interview process, the consent form process shall be ensured by the accompanying staff member and retained by the staff. All processes related to personal information collection shall follow the data and communication guidelines as part of the policy.

4. Children and parents should be informed about the voluntary nature of data sharing. Any child or parent/ guardian who wishes to ask a question should be given the opportunity to do so, especially on the purpose and process of data collection and the consequences (positive or negative) of taking part in the process. At any given point, the child/ parents may, if they don't wish to answer a question, choose to do so. They are free to withdraw from the data collection exercise at any point. The organisation needs to ensure that the data collection process would honour their confidentiality and privacy and allow them to share data anonymously if they choose to do so.

5. The consent form must be in a simple, local language appropriate for diverse beneficiaries. It should explain the purpose and process of case study/ data collection and discuss the specifics, such as access to information, data identification and storage. The forms shall be vetted by the organisation's internal research committee and the safeguarding committee and put up before an Institutional Research Board if required.

Consent Form (Parent/ Guardian)

I, -----, parent/ guardian of -----  
-----, am aware that pictures/ videos/ story/ case study/ information  
of my ward (Name/ Age/ Gender) -----  
----- is being requested for the following purpose: -----  
-----by -----  
(interviewer) who is associated with DRCSC in -----  
capacity.

I understand that DRCSC may use the image/ video/ story/ case study information shared by my ward  
----- for monitoring/ communication material/ external  
publication in the next three years. The organisation has assured me that this information shall be  
retained in a safe device within the organisation and not be provided to any other party except for ----  
----- (reason<sup>1</sup>). I have also been informed that I or my ward can  
withdraw consent anytime.

I am granting my consent to DRCSC to take, store and use this information/ data for the purposes  
given above.

Signature and name of the child providing consent

Signature and name of the Parent/  
Guardian Providing Consent

Signature of the person who has taken consent

Name and department of the person who has taken this consent.

(For media articles, the name and particulars of the reporter and details of publication are to be added  
here)

(Please provide a copy of the consent to the parent/ child if they ask for it)

---

<sup>1</sup> In case of a media article, the name of the publication, purpose, name of the reporter associated with the  
story may be shared with participants

**Annexure 10: Incident Complaint Form**

Complaint(s) date:	Name (including parents' name)	Age	Gender	Disability
Survivor (if identified):				
Reporter (if they are not the survivor):				
Reporter to the organisation (if different from the initial reporter):				
Mode and details of reporting to the organisation:				
Respondent (person(s) against whom complaint):				
Witnesses identified (if any):				
Nature of Complaint (be as specific as possible):				
Location(s) of complaint (be as specific as possible):				

(If a report is given anonymously, try to fill in as many details as possible)



### **Annexure 11: Inquiry Report Format**

Complaint Date	
Reported by	
Respondent (Subject of Complaint):	
Survivor (if identified)	
Nature of Complaint:	
Violation concern (suspicion/ actual/ failure to comply):	
Investigation Team:	
Witnesses Interviewed:	
Evidence (physical):	
Evidence (digital):	
Detailed Findings:	
Recommendation of the Team	
Person(s) to be informed of the decision:	

Signatures of all Team Members:

Signature of Designated Safeguarding Person:

## **Annexure 12: Infrastructure Guidelines for Safe Spaces for Children**

Organisations that work with children need to pay attention to making their physical infrastructure child friendly as well as safe, accessible and risk-averse. Physical spaces would include office space, community spaces, play spaces and all such areas where any organisational programme or engagement is held with children, directly or indirectly.

- **Structurally safe:** the building spaces need to be assessed from the structural, fire and disaster safety lens. Planning for contingencies should include basic safety mechanisms such as child-safe staircases, no sharp corners, safety rails etc. The physical spaces should be accessible to children and specially challenged children. Fire safety should be emphasised via multiple planned fire exits, sand buckets, and fire extinguishers. Guidelines for disaster safety and staff training should be part of the regular activity.
- **Clean and Hygienic:** This is especially critical when children, including young children, spend extended hours in the physical spaces managed by the organisation, including partaking in meals, playing, or holding discussions.
- **Space and Lighting:** Lighting is critical for children; hence, the physical area should be spacious and lit adequately for the number of people it accommodates. There should be no dark passages.
- **Electricity:** All electricity connections, points, and fixtures should be appropriately covered and safe to protect children from mishaps. Electrical and connected wires should be checked once in six months to avoid any open or damaged plug points, wires, etc., that may be an electrical hazard for children. The height of plug points and electric fixtures should be set up to be safe for younger, unsupervised children. Appliances for indoor heating and cooling, such as coolers, ACs, fans etc., should also be checked periodically for safety and untoward incidents. Special audio-video pieces of equipment that need to be plugged in for temporary events need to be managed, giving high priority to safety aspects.
- **Other Fixtures, including furniture:** Ensure that physical spaces are devoid of broken glass, damaged or non-functional windows, doors or furniture (chairs, tables, stools) that can hurt a child. Avoid having furniture with sharp corners, protrusions etc., which may harm a child physically.
- **Toilets:** Accessible and clean toilets with sufficient water, handwashing facilities, and privacy concerns to be ensured.
- **Drainage:** Proper drainage in and around the building premises for health and personal safety.
- **Safe drinking water availability, especially from an improved source**

## Checklist for Open Community Spaces

Apart from self-owned, rented office premises or residential spaces for housing children (whether temporary or for a longer duration), community spaces are another area where typical engagements with children may happen. These are often owned/ hired/ used with permission for running programmes with children. Such spaces are essential for reducing the financial burden on the organisation while at the same time obtaining a buy-in or contribution from the community. Such spaces must be a protected environment for children to participate in organised activities, such as playing, learning, socialising, and expressing themselves. Such spaces also need a fair amount of input for appropriate selection and design to make them child-friendly spaces.

- **Structural stability of building:** The building structure should be sound. It should not be damaged, cracked, or unstable in any way. Fire and disaster safety measures should be present, and regular systems/ processes should be established to ensure these.
- **Location and access:** Community spaces for children should be close to the residence of children so that they can safely access the place and travel to and fro from their homes. If possible, they should be visible from the home so that parents/ guardians may feel safe about sending young children out to the space for activities. Travel to and fro should not be obstructed, crowded or sparse for children to navigate. Children shouldn't get lost while going or coming due to numerous turnarounds or passages. The place and its access paths should have adequate people movement so there may be fewer chances of any untoward incident such as abduction, stalking, violence, or abuse. At the same time, the spaces should not open out in the middle of a market, a difficult landscape, a highway or an industrial area.
- **Electricity:** All connections, switches, appliances and fixtures should be checked once in six months so that no open plug points or uncovered wires may lead to an electric hazard for children. All electric fixtures should be considerably high to be safe for younger children. Electric equipment like coolers, ACs, fans etc., should also be checked periodically to ensure safety.
- **Other Fixtures:** Ensure no broken furniture, windows, or doors that could hurt a child. Avoid having furniture with sharp corners, protrusions etc., which may harm a child physically
- **Maintain cleanliness of the space** as children remain vulnerable to multiple diseases if exposed to unclean and unhygienic areas.
- **Access to safe toilets**
- **Drainage and Water logging:** Choose places with proper drainage. Also, ensure that the risk of water logging in the space or surroundings during the rainy season may be minimal.

**Children and External Travel Arrangements**

Any programme where children are expected to travel outside their place should be discussed in detail with the parents/ guardian, and consent of both parents/ guardians be taken orally and in writing. At least one responsible parent/ guardian from the community should accompany the child/ children on any such event. If a child is being rescued or rehabilitated, the two-adult norm should be followed, with at least one female staff member at all times.