

Catalysts for Social Action (CSA)



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*A family for every child*

**Child Protection Policy**

(Policy for Child Protection within the CSA network)

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## CSA's Child Protection Policy

### Foreword - Catalysts for Social Action (CSA)

Established in September 2002, Catalysts for Social Action (CSA) is an Indian non-governmental, social development organisation that works towards providing **holistic care & empowering orphan children** to decent livelihoods & independent living.

CSA works as a “**catalyst**” focusing on a holistic approach to child care and optimal rehabilitation outcomes. In the area of enabling holistic child care, we support a number of child care institutions (CCI) in the areas of Infrastructure support, Health & Hygiene, Nutrition, Recreation, Education, Life skills, and Vocational training. We continue to make a valuable difference to **3600+** children across **65+** child care institutions in 4 states (Maharashtra, Goa, Madhya Pradesh & Odisha) that we support.

We believe that adoption is the best form of child rehabilitation and it is our endeavor that every adoptable child finds a home. We have helped move **100+** children from CCI's into the adoption stream. We are now working on taking this project up on a larger scale across the country.

We were awarded the '**Best Small NGO**' in the Western region by ReSource Alliance. We are CSR project implementing partners of corporates like Accelya Kale Solutions Ltd., ICICI Prudential, Capital First to name a few and are listed by Credibility Alliance, National CSR Hub, Give India, Global Giving, CSO Partners, Letzchange & ReSource Alliance after a thorough due diligence from each of the listing partners..

### Vision

A nation that cares for and protects its orphaned children in need and ensures that every child is nurtured into a happy and contributing member of society.

### Mission

We work towards holistic care and optimum rehabilitation outcomes for every orphaned child. We promote, support, network, advocate and act as catalysts to achieve these objectives. We are an unstoppable force inspiring and channelizing action to bring about sustainable social change.

### Values

- Every Child matters!
- Child centric holistic approach to rehabilitation
- Sustainable change
- Transparency and Accountability

## 0.1 Introduction

Children are more vulnerable than adults just by being children, dependent on others for the realization of their rights. In a childcare institution (CCI) setting such as children's homes, orphanages, shelter homes, observation homes, adoption agencies etc., children's exposure to issues that would impede their rights to a safe & protected environment is much higher and the risk of child abuse and violation of child rights is far greater. CSA believes and advocates for child protection. CSA recognizes this and therefore, realizes that it is imperative for all stakeholders of CSA (partner childcare institutions, employees - full & part time, associates, trustees, vendors, and contractors, referral organizations, volunteers - full & part time, donors) to practice the highest standards of child protection.

CSA's intervention with children at childcare institutions includes conducting various activities with children like (health & hygiene camps, educational, awareness sessions, children committees, Vocation training, Counseling, fun & games etc.) In order for CSA to achieve its objectives, it is dependent on a complex web of relationships that involve childcare institutions (CCI's) & their trustees, caretakers, Child Welfare Committees / Women & Child development officials, contract staff, donors, volunteers, communities, vendors, contractors, suppliers. CSA's success is dependent on the honesty, integrity and commitment of all its stakeholders. Therefore, to minimize child protection risk and ensure that children are protected at all times, CSA has developed this Child Protection Policy (CPP) with a clearly outlined code of conduct, basic minimum standards, reporting mechanism and operational guidelines. This policy also intends to increase the awareness on child protection at the workplace and in the community.

## **0.2 Scope of the CSA Child Protection Policy (CPP)**

This CPP applies to:

- **Catalysts for Social Action:** To include all staff (full and part time), trustees, consultants, contract staff and interns
- **Associates of Catalysts for Social Action:** To include contractors, donors, funding agencies, volunteers of CSA and any other individual/s working with children on behalf of CSA

## **0.3 Review of the CSA Child Protection Policy**

This policy will be reviewed every three years by CSA. Upon review, changes made in the policy will be intimated to all organizations and persons who come within the scope of the policy and compliance with these changes would be mandatory.

## **0.4 Guiding Principles**

- Respect for dignity, liberty and freedom of the child

- The best interests of the child must remain in focus in all matters that affect or concern the child
- Children have the right to freedom of expression
- Children have the right to participate in decisions concerning them
- Respect for the child’s right to privacy and confidentiality
- Zero tolerance of any form of abuse of any child whether direct or indirect
- Belief that child protection is the responsibility of all

**0.5 Objectives**

- To ensure practice of the highest levels of child protection standards in CSA (including partner organizations)
- To ensure a well-defined and practiced reporting mechanism for child protection violations and time bound system of redressal
- To ensure assessment and management of child protection risk
- To ensure that there are basic minimum standards of child protection adhered to by all associates of CSA, partner organizations, contractors, donors, government and referral agencies, sponsors, funding agencies etc.
- To create consciousness and awareness about child protection

**0.6 Policy Statement**

Catalysts for Social Action (CSA) is committed to the protection and well-being of children in childcare institutions and adoption agencies. CSA adopts this CPP to ensure practice of the highest standards of child protection amongst all stakeholders. The policy creates a mechanism to report child protection violations and ensure prompt redressal.

<p><b>1.0 Components of the Child Protection Policy</b></p> <p><b>1.1 Code of Conduct</b></p> <p><b>1.2 Whistleblower Policy</b></p> <p><b>1.3 Implementation of the Policy</b></p>
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**1.1 Code of Conduct**

CSA recognizes the need for honesty, integrity and respect for the child to reflect both in decisions of the organization as well as in the conduct of its personnel. As a result, this code of conduct has been laid down for all staff and work associates including permanent and full-time as well as part-time staff, consultants and volunteers at CSA and the partner organizations.

### **Personnel Should:**

- Be conscious of and respect the privacy and dignity of each and every child at the childcare institution
- Be visible and not in a secluded place while in contact with children at the work place
- Ensure that a culture of openness exists that facilitates children to interact and express their issues and concerns with staff in CSA settings
- Respect and encourage children's voices and views
- Make efforts to ensure children's participation in decisions that affect their lives
- Inform children about steps of interventions being taken with respect to them or in the context of their lives
- Protect the child by not disclosing the identity of the child outside the team
- Uphold the privacy of the child by not disclosing the identity of the child to the media
- Educate children about their rights, issues of abuse, neglect and exploitation
- Ensure that there are staff members of the same gender when escorting the child between locations and also when taking care of the child/children at any location
- Be conscious of the possible need to support or adopt a different response when dealing with children who may suffer from trauma or a challenge to ability, making them more vulnerable than other children in the same situation. Ensure that the child's traumatic experience is not published to visitors/funders/public
- Ensure that visitors, interns, volunteers, outsiders, other CSA staff not associated with the child care institute have prior permission from the orphanage management should they plan to visit or work there

### **Personnel Should Not:**

- Hug or caress a child
- Touch in an inappropriate manner or area that would make the child uncomfortable
- Spend time with children alone
- Stay in a room alone with a child for an extended period
- Allow interaction with a child in a closed environment without supervision (except for counseling)
- Sleep alone with any child
- Stay back at the child care institution/orphanage or interact with children after dark/ 19:00 hours
- Take children to the residence of the team members / program officers / managers/ HOD for the night
- Do things for children of a personal nature that they can do themselves, such as use the toilet, bathe or change clothes (unless the child is severely ill or injured - in such case, another staff / caretaker should also be present)
- Engage children in personal work or employ children at work or at home
- Use language or expressions that are inappropriate for a child
- Use corporal punishment or tolerate corporal punishment by the staff

- Make any physical gestures in a manner that appears to be inappropriate or have a sexual context or association
- Develop any relationship with any child that is or could be assumed to be exploitative or abusive
- Discriminate against children on any basis such as, for example, community, color, language, disability or physical features
- Stigmatize or humiliate a child
- Act in any manner that puts children at risk
- Give gifts directly to children
- Patronize any service that employs children
- Take any photograph that would or could potentially violate the child's dignity or privacy in any way
- Share their personal contact information with any children or seek personal information of the children
- Share any sensitive and confidential personal & family information shared by the child with CCI staff & management without taking the child's permission

## 1.2 Whistleblower Policy

The Whistleblower Policy is framed to ensure that there is an appropriate mechanism in place to ensure prompt and fair action in the case of a child protection violation.

**Response Mechanism in case of a child protection violation:** Outlined below is a reporting and response framework for any alleged, witnessed or suspected child protection violation

- Report the matter in writing, directly to the Director-CSA
- Reporting of child protection violations within CSA is mandatory - anybody coming across a child protection violation must report it
- The Director together with the Program Officer will investigate the matter and take appropriate action in accordance with the guidelines for disciplinary action as has been followed in the past OR outlined in the CSA's Employee Handbook
- While the matter is under investigation, the individual who is suspected of having committed a child protection violation must be removed from direct contact with children
- The matter is to be addressed and brought to closure within a month of having been reported - responsibility lies with the Director-CSA
- Any alarming or inappropriate behavior of a staff member and any action taken against the person must be noted in his / her personal record
- If the abuse falls under IPC (Indian Penal Court) or any other relevant law, First Information Report (*FIR*) must be filed with the local police by CSA

## 1.3 Implementation of the Policy

- The overall implementation of the policy would be the responsibility of the Director-CSA
- The issues concerning protection within CSA intervention cases would fall in the purview of the Director - CSA
- The Partnership Agreement between CSA and Childcare Institutions necessarily includes acceptance of the CPP and the Operational Guidelines detailed ahead in this policy document
- All agreements / contracts / Terms of reference between CSA and its associates would include acceptance of relevant clauses of the CPP and Operational Guidelines detailed ahead in this policy

## **2.0 Operational Guidelines**

### **2.1 Human Resource Management**

#### **2.2 Representation of Children in the Media**

#### **2.3 Protection of Children benefiting from CSA's programs in Child Care Institutions**

### **2.1 Human Resource Management**

#### **2.1a Recruitment**

A standard recruitment process would be followed for recruitment of employees (CSA employees / CSA project staff at partner institutions)

- As part of the recruitment process, a resume and photograph should be submitted by the interviewee
- During the interview process -
  - Relevant questions should be asked to assess candidate's attitude and sensibilities regarding child protection
  - Explanations must be sought for matters such as gaps between periods of employment, frequent change of jobs or sudden resignation
- Applicant should provide complete contact information for at least two references along with the resume

- For each candidate, a thorough reference check should be carried out with the previous employer or the academic institute attended by the candidate (*if a fresh graduate*).  
Minimum of 2 reference checks for each candidate
- At the time of employment, the organization should also take the following from each employee -
  - Proof of Identity
  - Proof of Residence
  - PAN Card
  - Letter of experience from the previous employer
- A duly signed appointment letter should be issued to the employee mentioning conditions of employment
- All new recruits should be provided with a copy of the CPP
- All new recruits are to sign an undertaking acknowledging receipt of the CPP and stating their agreement and acceptance to all components of the Policy
- On recruitment, personnel file of the employee should be duly maintained  
The employee HR file should have -
  - Resume of the staff/employee
  - Photograph of the staff/employee recruited
  - Name and contact details of references and response of the reference checks
  - Copy of appointment letter given to the staff/employee
  - CPP undertaking signed by the staff/employee
  - Identity verification documents (*PAN Card, Residence Proof*)
  - Yearly performance review
- Each employee should be oriented to child protection and the CPP within a month of recruitment in CSA

### **2.1b Human Resource (HR) Practices for Associates of CSA**

For individuals who are associates of CSA, the guidelines for recruitment should be followed

- CSA does not associate itself with organizations that engage in activities that involve tobacco, alcohol and child labour
- In the case of organizations that want to associate with CSA or organizations that CSA desires to associate with, a detailed diligence exercise in addition to financial diligence needs to be undertaken to ensure that the organization's philosophy, mission, processes and practices are safe for children. The associate organization would need to:
  - not employ child labour
  - have zero-tolerance for any form of child exploitation and abuse
  - not patronize any service that may be exploitative of children

## **2.2 Representation of Children in the Media**

### **2.2a Media**

- CSA must protect the dignity, identity and privacy of children when and if there is contact with the media
- CSA needs to ensure, to the best of its ability, that while highlighting child protection issues, the media does not disclose the identity and details such as name, address, photograph of the child, locality and school
- Documents and records identifying children need to be kept confidential
- CSA should ensure informed consent from the CCI before disclosing any story to the media
- If any case is being reported by the media, proper scrutiny and monitoring of the content is to be ensured. In case of inappropriate reporting, the team is to take action against the same. Such action could include for example, taking up the matter in writing with the media house concerned
- While disclosing children's stories to the media, CSA should ensure that the media covers the story in a responsible and sensitive manner
- A standardized press note could be prepared for release to the media; a staffer should be designated for dealing with the media on the case
- Testimonies by children or representation of children in the media to discuss the problem/ abuse should be prohibited completely

### **2.2b Communication Material**

- While photographing children or using children's images in the production of communication material, CSA should explain to the best of its ability, the context and use of the child's image/ images
- In case of representation of CSA cases in publications, it must be ensured that names are changed and photographs do not reveal identity
- Representation of children in CSA material which is detrimental to a child's rights and dignity should not be permitted
- Ensure child personal and physical information that could be used to identify the location of child should not be used on CSA website or in any other form of communication about a child
- Ensure individuals or organizations requesting the use of CSA resource such as videos or photographs should be required to sign an agreement with CSA as to the proper use of such materials (CSA Marketing Manager)

### **2.2c Use of CSA Unpublished Case Records/Studies**

To ensure that a child's right to privacy and confidentiality is not violated -

- No unpublished CSA case record (case sheet/ counseling report, case study, medical report) under any circumstances should be shared with any other individual / entity other than stakeholders involved in the case
- Further no informal verbal discussion of the case should be conducted with any individual/ entity/ anyone other than the stakeholders involved in the case
- Under no circumstances should the identity of the child be revealed to anyone other than the stakeholders involved in the case

### **2.3 Protection of Children benefiting from CSA's programs in Child Care Institutions**

CSA works with children residing in Childcare Institutions day in and day out and our staff often interact with children. Desired requirements in any residential service that CSA works with -

#### **2.3a Legal Compliance**

- Registered under the Juvenile Justice (Care and Protection of Children) Act, 2015
- Duly licensed/ recognized as per the procedures laid down in the Juvenile Justice Model Rule/ state rules as shelter/ children's home and declared as a fit institution by the CWC of the district
- Has a management committee and facilitates management and monitoring as per norms of the Juvenile Justice (Care and Protection of Children) Act, 2015

#### **2.3b Infrastructure\*\***

- Separate accommodation for boys and girls above the age of 6 years
- The home should have access to transport facility
- The shelter must have sufficient space for children inclusive of stipulated number of toilets & bathing rooms as per JJ ACT 2015
- Safety equipment such as fire extinguisher should be available in the premise
- A room must be allocated to keep the bedding of the children, locker system to keep the personal belongings of the children
- All kinds of sanitary facilities, safe drinking water, hygiene care etc. must be provided
- Barrier free environment, ramp used instead of stairs keeping in mind children with disability
- If the shelter is crowded, alternate arrangements should be made in order to shift the child
- The provision for security to guard the place, should be as per the ICPS standards

- Children’s homes must as far as possible take in children as per their capacity and not over crowd the facility
- The premises should be disability-friendly

**\*\* Infrastructure related requirements is the sole responsibility of the CCI. CSA will work with CCIs and follow up with the CCI management to ensure that Infrastructure related requirements are in place, however, CSA is NOT responsible if the CCI does not meet stipulated requirements as per JJ Act 2015 and ICPS**

### **2.3c Human Resources**

- A trained social worker must be appointed
- Counselor must be appointed
- Visiting doctor once a week
- Care taker/ House parent must be available
- 1 Tutor/ Teacher appointed for every 25 children
- Same gender employees with same gender children, however, women staff can be taken in at boy’s home
- NO male staff in girl’s home
- Child protection to be included in capacity building programs of staff

### **2.3d Complaints Redressal Mechanism with Children’s Homes**

- Complaint box where children can leave notes explaining their issues. The box should be opened periodically by the Management / Trustee of the institution and or by the board member of the organization
- Every organization needs to have a mechanism for reporting and response of child protection violation

### **3.0 Partner Organization Agreements**

- All of CSA’s written agreements with partner organizations will include a clause referring to child protection and the expectation that the partner organization will have a child protection policy of its own or agree that its staff will abide by CSA’s child protection behavior protocols

### **4.0 Vendor’s and Contractor’s Agreements**

- Contractors / Vendors make a self-declaration stating that children (below 18 years) will not be employed by them for any task. This will be one of the clauses in the MOU in CSA’s dealings with Contractors/Vendors

## **5.0 Annexures**

### **Statement of Commitment / Code of Conduct**

This code of conduct constitutes a set of standards for appropriate behavior for guiding people who work with Catalysts for Social Action (CSA), whether on a part time or permanent basis. It also gives guidance to avoid situations that increase chances of risk mis-behavior when in the company of children.

The code is applicable to anyone acting as a representative of the organisation, whose work requires him/her to be in contact with children.

#### **Don'ts**

- Every organization needs to have a mechanism for reporting and response of child protection violation
- Spend time alone with a child either at the adult's home overnight or any secluded place
- Carry out personal activities on a child such as bathing and dressing
- Engage in inappropriate touch or physical contact with a child
- Make sexually provocative gestures towards a child
- Have a sexual relationship with a child
- Physically assault or abuse a child
- Make use of language that causes mental or emotional harm to a child
- Exploit children in any way or form
- Practice racial, cultural, gender based, religious, political or any other form of discrimination towards children.

#### **Do's**

- Avoid compromising situations that increase vulnerability
- Meet children in public places as much as possible
- Avoid actions and language and behavior of any kind that can be subject to misinterpretation by a third party
- Get informed written consent from CSA program officer or the CCI before taking photographs or statement from a child
- Be aware that age difference creates a power imbalance between adults and children and so avoid situations that might result in you taking advantage of children

**Statement of Declaration - Format**

**Declaration**

I (*Name*).....

have read and understood the guidelines, standards, and code of conduct as stated in the Catalysts for Social Action (CSA) Child Protection Policy. I agree to abide unconditionally to the said policy, and will ensure that my conduct at all times ensures the protection of children as laid down in the policy

**Title/Position:** ..... **State:** .....

**Signature:** ..... **Date:** .....

**Relationship with CSA: (Tick one) Employee / Volunteer**