



**Projonmo**

**Policy for Child Protection Policy (CPP)**

# CHILD PROTECTION POLICY

## 1. INTRODUCTION

Child abuse is a worldwide problem that affects children and adolescents in various settings. It includes physical, sexual, and emotional abuse as well as neglect. This abuse is typically preventable. Children and adolescents can face exploitation, violence, and neglect in families, communities, institutions, organizations, private and public places, and by different individuals, including conference delegates, support staff, and others associated with the event. To address and protect children and adolescents involved with Projonmo from potential abuse and exploitation, a Child Protection Policy has been developed.

It is crucial to safeguard children with disabilities, who are equal citizens of the nation, from any harm. Recognizing the significance of safety and protection for all children, the Constitution of India guarantees equality and non-discrimination based on gender, disability, age, religion, ethnicity, and more. The UN Convention on the Rights of the Child (1989) also emphasizes the need for measures to protect children from various forms of violence, abuse, neglect, and exploitation while in the care of parents, legal guardians, or other caregivers.

Further, Clause 2.2 of the preamble of National Policy for Children, 2012 states that,

- “All children have equal rights irrespective of place of birth, sex, religion, caste, class, language, disability, social economic or any other status;
- All children have the right to a loving family, and a dignified life free from exploitation, and families are to be supported by a strong social safety net in caring for and nurturing their children.
- Safety and security of all children is integral to their well-being and children are to be protected from all forms of harm, abuse, neglect, violence, maltreatment, and exploitation”

**Projonmo also recognizes the rights of protection of children provided by the special laws on children, in particular:**

- Juvenile Justice (Care and Protection of Children) Act 2015;
- Protection of Children from Sexual Offence Act 2012;
- Prohibition of Child Marriage Act 2006;
- Child Labor (Prohibition and Regulation) Act 2016

## 2. PURPOSE OF THE POLICY

The purpose of this policy is to create awareness on Child Protection and how to prevent and report child abuse by any stakeholders of Projonmo

Projonmo is committed to the well-being of children and **has zero tolerance** to any form of child abuse or exploitation. This policy is in consonance with the UN Convention on the Rights of the Child (1989).

This policy is also a testimony of Projonmo's commitment to all four sets of rights of children i.e., Rights to Survival, Development, Protection, and Participation, and is based on the principles of the best interest of the child, non-discrimination and right of every child to be heard.

Undertake special measures for especially vulnerable children based on age, (dis)ability, gender, geographical location, ethnicity, religion, and socio-economic status to ensure that they are not further marginalized or unprotected

### 3. PROJONMO'S INTERFACE WITH CHILDREN

'Projonmo comes face to face with children on many occurrences during the course of its work. Some of the situations where children may be involved are:

- **Special Education Class:** Projonmo could organize or support special education classes for children with learning disabilities or developmental challenges. These classes would focus on tailored teaching methods and materials to cater to each child's unique learning needs.
- **Occupational Therapy:** Projonmo collaborates with occupational therapists to provide children with activities that help improve their fine motor skills, coordination, and sensory processing. These activities could be both fun and therapeutic, contributing to the children's overall development.
- **Speech Therapy :** In partnership with speech therapists, Projonmo offers speech therapy sessions for children with speech and language disorders. These sessions would aim to improve communication skills and boost the children's self-confidence.
- **Vocational Activities:** Projonmo engages children in vocational activities that promote skill-building and self-sufficiency. This could include workshops or training sessions in various fields, preparing children for future employment opportunities.
- **Remedial Education:** Children who need additional support in academic subjects could benefit from Projonmo's remedial education programs. These programs would focus on addressing specific learning gaps and helping children catch up with their peers.
- **Schooling:** Projonmo is dedicated to offering quality education to children with disabilities and creating a safe and nurturing learning environment

In all these situations, Projonmo would ensure that its approach is child-centered, respectful of individual needs and abilities, and carried out in collaboration with professionals in the respective fields. The organization believes in prioritizing the well-being and development of each child despite any kind of disability, fostering a positive and supportive environment that encourages their growth and progress. Additionally, Projonmo upholds ethical standards, adheres to child protection protocols, and works closely with parents, guardians, and the community to ensure the best outcomes for the children involved.

### 4. SCOPE

**Drawing inferences from point 3, this policy would apply to**

- Projonmo: Board, all staff, consultants, interns, and volunteers.
- Project partner organizations: All its staff (part-time and full-time), board, consultants, interns, and volunteers.
- Other associates: all vendors, suppliers, and donors (institutional and individual).

## 5. DEFINITIONS:

### CHILD

A child is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child (1989). The National Policy for Children 2012.

### CHILD PROTECTION

When considering child protection for children with disabilities, the principles and components there are considerations and nuances to ensure their specific needs are addressed:

- i. Protecting a child with a disability from any perceived risk or danger to their life, their personhood, and their childhood: This emphasizes the need to provide extra support and safeguards for children with disabilities, who may be more vulnerable to certain risks due to their condition. It includes addressing accessibility and safety concerns to ensure their physical well-being and protect them from discrimination, abuse, or neglect.
- ii. Reducing their vulnerability to harmful situations and protecting them against social, psychological, and emotional insecurity and distress: Children with disabilities may face unique challenges that make them more susceptible to harmful situations and emotional distress. Child protection efforts should focus on creating an inclusive and supportive environment that considers their specific needs, promotes their mental well-being, and addresses any potential social isolation or stigmatization.
- iii. Ensuring that no child with a disability falls out of the social security and safety net and those who do, receive necessary care and protection are brought back into the safety net: Children with disabilities may require specialized services and support to ensure they are not left behind or excluded from essential social services. Child protection measures should aim to provide equitable access to healthcare, education, rehabilitation, and other necessary services to prevent them from falling through the gaps and to reintegrate them into the safety net if they do.
- iv. Believing that a child with a disability is entitled to express her/his opinion and can make decisions for herself/himself and act accordingly: Children with disabilities have the right to express their opinions, preferences, and aspirations, even if they communicate differently. Child protection efforts should involve finding appropriate ways to engage with and include them in decision-making processes that affect their lives, while also considering their capacity to make informed decisions.

In summary, child protection for children with disabilities requires a more targeted and individualized approach that considers their unique needs, challenges, and strengths. It involves ensuring their rights are upheld, providing necessary accommodations, and fostering an environment of inclusion, support, and empowerment.

### CHILD ABUSE

Child abuse involving children with disabilities refers to the mistreatment, harm, or neglect of children who have physical, intellectual, sensory, or developmental impairments. Children with disabilities are at an increased risk of experiencing abuse due to their potential vulnerabilities and dependencies. Child abuse in this context can take various forms, including:

1. **Physical Abuse:** This refers to any non-accidental use of force that causes injury or bodily harm to a child with a disability. It could involve actions such as hitting, slapping, shaking, or any other form of physical aggression.
2. **Emotional Abuse:** Children with disabilities may be subjected to emotional abuse, which includes actions that negatively impact their self-esteem, emotional well-being, and mental health. This could involve verbal insults, humiliation, degradation, or isolating the child.
3. **Sexual Abuse:** Children with disabilities are at risk of sexual abuse, which involves any sexual activity imposed on them without their consent. This can include any sexual contact, exposure to explicit materials, or exploitation.
4. **Neglect or Negligent Treatment:** Neglect involves failing to provide proper care and attention to a child's basic needs. For children with disabilities, neglect could mean not providing necessary medical treatment, therapies, or assistive devices, as well as failing to address their emotional and psychological needs.
5. **Commercial Exploitation:** Children with disabilities may be more vulnerable to exploitation for financial gain due to their dependency on caregivers. This could involve using the child for begging, labor, or other activities that exploit their disability.
6. **Actual or Potential Harm to Health, Survival, Development, or Dignity:** Any form of abuse that negatively affects the physical health, mental well-being, developmental progress, or dignity of a child with a disability falls under this category.
7. **Context of a Relationship of Responsibility, Trust, or Power:**  
Children with disabilities often rely heavily on their caregivers, educators, and others in positions of authority. This dependency can create a power dynamic that perpetrators may exploit, making it essential to be vigilant and protective of these relationships.

#### CHILD PROTECTION VIOLATION

1. **Putting a child at risk of abuse:** Any intentional action that places a child with a disability in a situation where they could be harmed or subjected to abuse.
2. **Increasing the risk of abuse:** Any behavior, even unintentional, that has the potential to raise the likelihood that a child with a disability might experience abuse.
3. **Failure to act during ongoing abuse:** Not taking appropriate action or intervention when a child with a disability is known to be experiencing abuse, neglect, or exploitation.
4. **Not following prescribed protocols or code of conduct:** Disregarding established rules, guidelines, or codes of conduct meant to ensure the safety and protection of children with disabilities.
5. **Failure to report abuse or exploitation:** Neglecting to inform the appropriate authorities when there is knowledge or suspicion of abuse or exploitation affecting a child with a disability.

It's important to note that this policy is designed to safeguard the well-being of children with disabilities and prevent any form of harm or mistreatment. Violations of the policy can have serious consequences due to the vulnerable nature of the children involved.

## 6. GUIDING PRINCIPLES

- **Recognition of children's rights:** The rights of all children must be protected and promoted as set out in the Constitution of India and the UN Convention on the Rights of the Child. This includes the right to freedom from abuse and exploitation. Projonmo is committed to upholding the rights and obligations of children and recognizes that some children, such as children with disabilities and children living in areas impacted by disasters are particularly vulnerable. Child Protection forms an integral part of all Projonmo's work where children are made aware of their rights, which would help them to be safe from abuses.

- **Zero tolerance of child abuse:** We have a commitment to protecting children with/for whom we work. Child abuse shall not be tolerated by Projonmo in any form. We would not knowingly engage, directly or indirectly, anyone who poses an unacceptable risk to children, nor fund any individual or that do so. When we work through partners, they have a responsibility to meet minimum standards of protection for children in their programs.

## 7. CODE OF CONDUCT

All staff, Educators interns, volunteers, consultants and visitors shall:

- Establish an atmosphere conducive for the development of children through their word, deed and demeanor. This includes listening to children and showing respect to them.
- Respect the local cultural context and behave in appropriate manner with children in communities.
- Not allow project children to visit the homes of any staff, intern, etc. unless it is precipitated by a severe threat to the safety of the child.
- Not have the project children stay overnight in the home of Projonmo personnel at any time.
- Not employ children as domestic workers in their homes. Should not take services provided by child labor or any activity/action that leads to child labor.
- Prevent marriages of their children before the legal age of marriage.
- Not engage in any form of corporal punishment of children
- Not spend time alone, in a personal capacity, with a project child or children. There should always be another adult who would be able to see the interaction.

**The exception to this may be in the event where personnel are employed as professionally recognized trained counselors, teachers, and therapists and doctors .**

- Always be calm during the interaction between an adult and a child even when it appears that a child is acting in a provocative manner.
- Not touch private parts of the body, or any touch in such a way that would make a child uncomfortable.
- Never hit, otherwise physically assault, or physically abuse children.
- Never develop physical/sexual relationships with children or any such relationships, which could be deemed exploitative or abusive.
- Not use language, make suggestions, or offer advice, that is inappropriate, offensive, or abusive to children.
- Not acting in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Not discriminate against, or favor a particular child to the exclusion of others.
- No staff will document/ take pictures/video of children, which show the child in distress and undignified condition. Also, will ensure proper consent on the parents of the child while doing so.

This is not an exhaustive or exclusive list. The principle is that staff should avoid actions or behavior, which may constitute poor practice or potentially abusive behavior

It is important for all staff and others in contact with children to:

1. **Be aware of situations, which may present risks and manage these:** Staff and caregivers should be particularly attentive to potential risks that children with disabilities might face due to their unique needs. It's essential to identify and address these risks promptly.
2. **Plan and organize the work and the workplace to minimize risks as far as possible:** This is especially important for children with disabilities who may require specific accommodations or adaptations in their environment to ensure their safety and comfort.
3. **Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed:** Creating an environment where children with disabilities feel comfortable expressing their concerns or issues is crucial. This includes recognizing potential communication challenges they may face and providing alternative means for them to communicate.
4. **Ensure that an essence of accountability exists between staff so that poor practice or potentially abusive behavior does not go unchallenged:** Staff should be vigilant about any signs of mistreatment or neglect and take appropriate actions to address them. This is particularly important for children with disabilities who may have difficulties communicating their experiences.
5. **Talk to children about their contact with staff or others and encourage them to raise any concerns:** For children with disabilities, discussing their interactions with adults and peers can help them understand what is appropriate and give them the confidence to report any issues they encounter.
6. **Empower children - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem:** Empowering children with disabilities means providing them with the knowledge and tools to advocate for themselves, communicate their needs, and recognize when something isn't right.

Overall, these guidelines underscore the importance of adapting strategies to cater to the unique needs of children with disabilities, ensuring their safety, and fostering an environment of respect, communication, and empowerment.

## 8. IMPLEMENTATION

### Creating Awareness.

The organization is making a concentrated effort to raise awareness about Child Protection among all stakeholders. This implies educating various parties involved about the importance of safeguarding children, including those with special needs.

### During induction: At the staff level.:

Child Protection training is included as part of the staff induction process. New employees will receive training on Child Protection, and this training will be facilitated by the Human Resources department in consultation with the Gender Justice team.

### **Information to the Board:**

The Senior Leadership Team (SLT) will communicate and present the Child Protection initiatives to the organization's Board members. This ensures that the Board is informed and engaged in the organization's efforts to protect children, including those with special needs.

### **Information to the Vendors**

The admin & and procurement team shall be responsible for creating awareness among their vendors

### **Dissemination of information in general:**

The Admin and Procurement team will take on the responsibility of raising awareness about Child Protection among the organization's vendors. This demonstrates a commitment to child protection throughout the supply chain.

Projonmo is committed to making the child protection policy easily accessible to children with disabilities. Additionally, the organization is ensuring that information about the Internal Committee established to address sexual harassment cases is readily available to them. This ensures that children with disabilities are aware of their rights and the available support mechanisms.

Projonmo is dedicated to creating a complaint process that is well-informed, active, and responsive. This means that children with disabilities will be informed about how to raise concerns or complaints, and the organization will take steps to ensure that the process is actively managed and tailored to the needs of each situation.

### **Prevention and Redressal Mechanism**

#### **a) Committee for awareness, monitoring and redressal–**

A committee called the Child Protection Committee shall be set up within the organization, which shall consist of the Secretary, **the Lead Specialist– Gender Justice, the Coordinator-Education and up to three members from regional offices across all grades and one ex officio member–child rights specialist/activists**. These members would carefully be chosen and their contact details would be widely shared among all stakeholders.

#### **Role of the Committee:**

- a. Committee will give recommendations to the board of directors
  - b. The committee shall ensure the availability of the contact details for registering complaints on violation of CPP through various mediums of communication.
  - c. The committee shall work in collaboration with the Communication Team in case any image of child/ children is used.
  - d. The actions/ Redressal undertaken by the committee will be informed by the Board and Directors annually.
  - e. The committee will be responsible for investigating, monitoring, and evaluating the cases of Child Protection Violation. The committee will give recommendations to the jury
- b) Jury on Child Protection Policy:** The Jury will comprise of an ex official-member -a child rights activist, SLT member, CEO and Board Member.
- The Jury will meet within 3 days of receiving the recommendation from the Child Protection Committee.
  - The Jury will give its verdict within 5 working days after listening to the CPP and person in contact.
  - The verdict given by the Jury will be final for the concern department.



- c) **The role and duty of Human Resources Department in ChildProtection– Recruitment** Child Protection would be made an integral part of the staff recruitment process. Child rights-related question(s) would be made a mandatory part of the assessment format as well as a reference check. Along with this, Child Protection policy would be included in the offer letter to all new employees and all Projonmo Board members. As part of the acceptance procedure, employees would be asked to sign a declaration of the policy stating that they are aware of its existence and would abide/adhere to it. The declaration would be kept on the staff member's file and may be referred to in legal proceedings if a staff member is found to be in breach of the policy.

**Evaluation:** Human Resources will critically assess the performance of the staff in concern. (KRA will assess the individual's ability to live the values of the organization in this context)

- d) **The responsibility and authority of all Projonmo Staff in ChildProtection:**  
Specific delegated authorities are outlined below.

Activity	Who	When
Report concern, suspicion, disclosure or witness of incidents of child abuse or breaches of the Code	All Staff	As per reporting procedures.
Investigate incidents	a) Special Educators /Therapist  b) Director - Operations  (With support from Child Protection Delegate or Focal Point)	Investigate within 24 hours of receipt of report.
Decision to refer incidents to external authority.	Director – Operations	As required.
Register incidents	Child Protection Committee	As received.
Report on incidents and breaches of the policy and code to the Director-Operations.	Child Protection Committee.	Quarterly
Report, as part of the Annual Program Report, on application of child protection policies and procedures as they relate to beneficiaries (as per Executive	Secretary – Operations	Annually
Ensure all field office staff have access to and participate in Child Protection training	Director-Operations	Annually or more regularly if required.
Ensure all Projonmo staff have access to and participate in Child Protection training	Director-Operations	Annually or more regularly if required.

## 9. REDRESSAL OF NON-COMPLIANCE/GRIEVANCE

All Projonmo Staff and partners, by the nature of their work, interact with vulnerable communities and children and therefore should be aware of sensitive information concerning children. In the event of such a situation, concerns that are evidenced by impairment of health, physical injury, sexual exploitation, criminal activity or threats must be reported immediately to statutory child protection agencies or equivalent authorities. This information may be called upon as evidence in child protection investigations or to inform decision-making. Projonmo and partner staff may become aware of infringements of Rights, or, allegations of infringements, or, stories of infringements. Sometimes circumstances and intuition would leave the worker suspecting an infringement of rights. These circumstances would also be investigated.

- (i) Projonmo staff/ partner having firsthand account of such child abuse will inform the child protection committee. Confidentiality will be maintained for each case.
- (ii) All children, OIN employees, partner staff, volunteers, and consultants will be informed about the Redressal mechanism process and the communication process to report cases of child abuse and exploitation.
- (iii) All incidents of abuse, complaints, inquiry proceedings, and Redressal of it would be documented formally and monitored on a regular basis. These documents would be shared with staff from time to time to create new benchmarks in Child Protection practices within the organization.
- (iv) Disciplinary measures would be initiated against any Staff member found to be engaged in the following acts:
  - ☐ Inducing or coercing a child to engage in sexual activity
  - ☐ Exploitative activities with children including child labor or trafficking
  - ☐ Use of children's photographs for pornographic or other inappropriate use
  - ☐ Subjecting any child to torture or other cruel, inhuman, or degrading treatment or punishment
  - ☐ Mistreating or depriving the child in any manner

Disciplinary measures would include

  - ☐ Suspension<sup>1</sup> until the Child Protection Committee investigates and submits the report and HR officially communicates the person to rejoin the office.
  - ☐ In case the Jury recommends legal action then the Organization will pursue a legal case against the person.
  - ☐ Public apology to the concerned child and community
  - ☐ As recommended by the Jury and the Child Protection Committee
- (v) Any partner/ vendor found to be engaged, or suspected of being engaged in the above acts would be reported to the relevant authorities at the discretion of Projonmo. If such an allegation were proved against a partner or vendor, Projonmo would discontinue working with such a partner or vendor.

Staff is encouraged to be sensitive and respect the cultural identity of children in areas and communities where we work.

## 10. REVIEW OF POLICY

This policy will be reviewed every three years to keep it in consonance with changing times.