



Child Protection Policy

Contents

1. Introduction 3
2. Definitions 4
3. Our Statement of Commitment to Children 5
4. Guiding Principle and Core Values 6
5. Purpose of the Policy 8
6. Applicability of the Policy 9
7. Mandate as per the Indian Law 10
8. Child Abuse and Forms of Abuse 12
9. Child Protection 16
10. Limitation on Photography, Electronic Communication and Social Media 22
11. Safety and Care 23
12. CPP Developing and Implementation in EmpowerEd Foundation 26
13. Dealing with Incidents of Abuse 27
14. Child Safety in Online Programs 33
15. Amendments 37
16. Annexures 38

1. Introduction

EmpowerEd Foundation was formed by Dr George Samuel in the year 1992, to enrich the values in the lives of youth and children through value-based education. Dr George Samuel is a Nuclear Scientist by profession who started his career as a Scientific Officer at Bhabha Atomic Research Centre in Mumbai and later served as a Consultant at the World Health Organization (WHO). Since 1992, EmpowerEd Foundation has been involved in imparting value-based education to teachers, students, and parents in Kerala and other parts of the Country. EmpowerEd Foundation has imparted value-based education to about 60,000 teachers. Over 10,000 students and 5000 parents have also benefited from the training sessions. In 1999, Mrs. Anne Elizabeth Samuel, a Software Engineer by profession, was inducted as the Director of EmpowerEd Foundation. Under her leadership, EmpowerEd Foundation continued its mission of impacting students, teachers and parents through value-based education classes.

EmpowerEd Foundation believes and practices that Child protection, Safety and care are everyone's responsibility. It is our obligation as mature individuals and as part of EmpowerEd Foundation's Commitment to take care of the emotional, physical, intellectual and spiritual welfare of children in our care.

The CHILD PROTECTION Policy is strongly rooted in the EmpowerEd Foundation's vision, mission and values; the United Nations Convention on the Rights of the Child (UNCRC); and the Child Protection laws of the Indian Government, including the Juvenile Justice Act among others.

2. Definitions

i. Child

The EmpowerEd Foundation (hereafter referred to as EmpowerEd) affirms that A child means every human being below the age of eighteen years of age unless under the law applicable to the age of majority is earlier. JJ Act 2015 Section 2(12) defines child as a person who has not completed eighteen years of age.

ii. Corporal Punishment

The use of physical force causing pain, but not wounds, as a means of discipline (includes spanking, rapping on the head and slapping).

iii. Direct Contact with Children

Being in the physical presence of a child or children in the context of the organization's work, whether contact is occasional or regular, short or long term.

iv. Child Protection Policy

A framework of principles, standards and guidelines to create a safe and positive environment for children that protects them from intentional and unintentional harm in any form.

v. Incident Investigation Committee (IIC)

Three-member committee shall be constituted by EmpowerEd Foundation to investigate the complaints of child abuse and to report to the Management Committee. This committee will have not less than two female members and shall constitute as follows:

- I. One member of Volunteer
- II. One senior staff in a leadership position in the main office, preferably female
- III. One senior member of the field staff, preferably a lady

vi. EmpowerEd Foundation Management Committee

The EmpowerEd Foundation Management Committee shall consist of not less than five persons chosen by EmpowerEd Foundation along with the Director to conduct the proceedings of complaints based on the report submitted by the IIC.

3. Our Statement of Commitment to Children

EmpowerEd Foundation will work along with children, their parents and communities to ensure that:

1. Children are value-driven.
2. Children are skilled for academic and professional excellence.
3. Children are valued and cared for.

4. Guiding Principle & Core Values

The 4 enshrining principles of the United Nations Convention on the Rights of Child (UNCRC) adopted by the state of Kerala and are listed below will be the Guiding Principles to help the EmpowerEd Foundation in keeping the children safe and implement the policy.

- 1) **Survival:** These rights include Health, Nutrition and Shelter.
- 2) **Protection:** These rights include protection from all forms of child abuse, neglect, exploitation, discrimination, and cruelty including the right to special protection in special conditions.
- 3) **Development:** These rights include leisure and recreation, cultural activities and a right to standard of living that is adequate for the child's physical, mental, spiritual, moral and social development.
- 4) **Participation:** These articles cover the rights of the child to express his/her view in all matters affecting that child, in keeping with her evolving capacities.

Core Values

- 1) **Social Responsibility:** Be ready to be involved in social activities to meet human needs and alleviate suffering. Those who receive training from the EmpowerEd Foundation should be motivated to serve by responding to the people around them. They should be willing to do the best for the needy considering it as their duty as a citizen of the country without expecting any gain in return. The students are motivated to develop a mindset that will sacrificially contribute to the needs around them, leaving their comfort zones. In the process of doing what you can when you can, they are encouraged to partner with other entities (individuals or organizations) who possess the means and resources to find adequate solutions in a particular context. The basic precept is that if we turn a blind eye to the social needs of people around us, let us not be surprised if they turn a deaf ear to what we preach.

- 2) **Societal Upliftment:** Get involved in moving a people living in conditions contrary to divine purposes into a condition of existence in which they can enjoy life in all its fullness. The services rendered by our students should result in the betterment of the society. EmpowerEd Foundation desires to see those who are trained under its wings to be self-reliant in all their pursuits. This should also be reflected in the rise of their standard of life and of their families. Their contributions should also spread to their colleagues in their workplace and add value to the organization they serve. It is also very important that the benefits of their services trickle down into the society and thereby result in the upliftment of the society as a whole.
- 3) **Stewardship:** Practice and promote a balanced attitude towards the use and management of resources. The students should be equipped to harness their skills and talents by exercising responsible stewardship of resources. They should be able to acquire the know-how of choosing sustainable methods, preserving not only the dignity of people but also the life sustaining capacity of the earth. The training programme itself should focus on developing the students to become stewards of the skills they acquire from EmpowerEd.
- 4) **Credibility:** The image earned by fulfilling responsibilities promptly and thoroughly with reliability and sincerity. Even as students are equipped with skills, the objective of EmpowerEd Foundation is to help them reflect credibility in their life and work by what they are and what they do. EmpowerEd Foundation realizes that their future services will hinge on the testimony they bear among their beneficiaries as well as their employers.
- 5) **Perseverance:** Make progress in work and character in spite of difficulties and adversities. Doing the right thing in the right way at the right time is a key element in providing services to the society. In a competition driven society such as ours, the students should not feel enticed to take short cuts or apply wrong means, rather persevere to work with patience and uphold good values while attempting to accomplish their tasks. It is also the EmpowerEd Foundation's commitment that

the students be equipped to overcome adversities and difficulties in life and work, with perseverance.

5. Purpose of the Policy

I. This policy helps to:

- Ensure the protection for every child that comes in contact with EmpowerEd Foundation.
- Prevent incidences of child abuse in the training location and outside the training location.
- Make children aware of their rights and their participation in ensuring their rights are protected.
- Create awareness with the EmpowerEd Foundation members, board members, staff, volunteers, visitors, donors and the children on the policy and procedures of implementation of Child Protection.
- Meet the standards and norms of ICPS (Integrated Child Protection Scheme) and JJ Act of the government of India.
- Create a conducive environment where children are cared for and grow into productive individuals.
- Hold honest and open discussions on child abuse at all levels of the Value Education Trust including children, youth, young adults, the family units, the elderly, teachers, all staff paid or voluntary, and visitors.
- Ensure secure, fair and transparent reporting systems and channels that guarantee that children and all co-workers and family members are able to be heard.

II. Laws Governing Children

EmpowerEd Foundation makes every effort to comply with the guidelines prescribed by the acts and rules listed below:

- The Juvenile Justice Act (care and protection) Act 2015
- The Protection of Children from Sexual Offence Act 2015

6. Applicability of the Policy

The EmpowerEd Foundation - Child Protection Policy applies to staff at all the levels – in office, in field or at the regional offices, Board Members, Donors, volunteers, Parents / local committees, instructors, students, interns, vendors, hostels, schools, representatives of Partner Organizations/ Institutions and more particularly to Children below 18 years, young adults, Counsellors, Employees. This policy applies wherever camps, retreats, Special trainings, tuition centers, volunteer trainings and other trainings are conducted by EmpowerEd Foundation or wherever the staff /volunteers Lawyers, Auditors and other Professionals, Visitors (all visitors to the EmpowerEd Foundation), etc. attend as trainers.

Each person is responsible for having a thorough knowledge of this policy and the procedures set out below, acting in accordance with this policy and complying with the EmpowerEd Foundation Child Protection Code of Conduct.

Breach of this policy or the Child Protection Code of Conduct constitutes an act of misconduct and becomes the ground for disciplinary action and/or termination of employment for the staff of EmpowerEd Foundation.

7. Mandate as per the Indian Law

EmpowerEd Foundation - makes efforts to follow the guidelines prescribed in The Juvenile Justice Act section 3 which lays down General Principles of Care and Protection of Children which are as listed below:

1. **Principle of presumption of innocence:** Any child shall be presumed to be innocent of any malafide or criminal intent up to the age of eighteen years.
2. **Principle of dignity and worth:** All human beings shall be treated with equal dignity and rights.
3. **Principle of participation:** Every child shall have a right to be heard and to participate in all processes and decisions affecting his/her interest and the child's views shall be taken into consideration with due regard to the age and maturity of the child.
4. **Principle of best interest:** All decisions regarding the child shall be based on the primary

consideration that they are in the best interest of the child and to help the child to develop full potential.

5. **Principle of family responsibility:** The primary responsibility of care, nurture and protection of the child shall be that of the biological family or adoptive or foster parents as the case may be.
6. **Principle of safety:** All measures shall be taken to ensure that the child is safe and is not subjected to any harm, abuse or maltreatment while in contact with the care and protection system, and thereafter.
7. **Positive measures:** All resources are to be mobilized including those of family and community, for promoting the well-being, facilitating development of identity and providing an inclusive and enabling environment, to reduce vulnerabilities of children and the need for intervention under this Act. The term positive measures include the avenues for health, education, relationships, livelihoods, leisure, creativity and play.
8. **Principle of non-stigmatizing semantics:** Adversarial or accusatory words are not to be used in the processes pertaining to a child.
9. **Principle of non-waiver of rights:** No waiver of any of the right of the child is permissible or valid, whether sought by the child or person acting on behalf of the child, or a Board or a Committee and any non-exercise of a fundamental right shall not amount to waiver.
10. **Principle of equality and non-discrimination:** There shall be no discrimination against a child on any grounds including sex, caste, ethnicity, place of birth, disability, health, status, race, religion, cultural practices, work, activity or behaviour of the child in conflict with law or that of her parents or guardians, or the civil and political status of the child. This principle also includes that equality of access, opportunity and treatment shall be provided to every child.
11. **Principle of right to privacy and confidentiality:** Every child shall have a right to protection of his/her privacy and confidentiality, by all means and throughout the judicial process. In other words, no report in any newspaper, magazine, news-sheet or audio-visual media or other forms of communication regarding any inquiry or investigation or judicial procedure, shall disclose the name, address or school or any other particular, which may lead to the identification of a child in conflict with law or a child in need of care

and protection or a child victim or witness of a crime.

12. **Principles of natural justice:** Basic procedural standards of fairness shall be adhered to, including the right to a fair hearing, rule against bias and the right to review, by all persons or bodies, acting in a judicial capacity.

8. Child Abuse and forms of abuse

'Child Abuse' constitutes 'all forms of physical and/or 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).

1) Physical

Abuse

Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents (WHO, 1999). **Signs of physical abuse:**

- a) Unexplained burns, cuts, bruises or welts
- b) Bite marks
- c) Anti-social behaviour
- d) Problems in school
- e) Fear of adults
- f) Drug or alcohol abuse
- g) Self-destructive or suicidal behaviour
- h) Depression or poor self-image

2) Sexual

Abuse

Child sexual abuse is the involvement of a child in sexual activity that he/she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent or that violates the laws or special taboos of society. Child sexual abuse is evidenced by an activity between a child and an

adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the ulterior needs of the other person. This may include but is not limited to the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; and the exploitative use of children in pornographic performances and materials. **Signs of sexual abuse:**

- a) Seductiveness
- b) Avoidance of things related to sexuality or rejection of one's genitals or body
- c) Nightmares and bedwetting
- d) Drastic changes in appetite
- e) Over compliance or excessive aggression
- f) Fear of a person (opposite gender)
- g) Withdrawal, secretiveness, or depression
- h) Suicidal behaviour
- i) Eating disordersSelf-injury

3) Emotional

Abuse

Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full run of emotional and social competencies commensurate with her or his personal potential, and in the context the society in which the child dwells.

There may also be acts towards the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development.

These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power.

Acts includes restriction of movement, patterns of belittling, denigrating, scapegoating, corrupting threatening, scaring, discriminating, ridiculing, bullying, humiliating (e.g. asking potentially embarrassing questions, demanding potentially embarrassing actions) or other non- physical forms of hostile or rejecting treatment (WHO 1999).

Signs of emotional abuse:

- a) Apathy
- b) Depression
- c) Hostility
- d) Lack of concentration
- e) Eating disorders

4) Neglect

Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as inattention/omission of care and failing to ensure a safe environment (leaving dangerous things within reach of a child, such as medication, arms, etc.) much as is feasible (WHO, 1999).

5) Exploitation

Exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. Child labour is defined as "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development". It refers to work that:

- a) is mentally, physically, socially or morally dangerous and harmful to children; and
- b) interferes with their schooling by:
 - i) depriving them of the opportunity to attend school;
 - ii) obliging them to leave school prematurely; or
 - iii) Requiring them to attempt to combine school attendance with excessively long and heavy work.

6) Self-Harm

This occurs when a child deliberately cuts or harms themselves, often as a result of overwhelming emotional stress. While it is not usually an attempt at suicide, many who self-harm, are more likely to attempt suicide at some time. If a child who is self-harming

is not already receiving support, then EmpowerEd Foundation is advised to refer the child—usually through their family in the first instance—to appropriate help. Where the family resists the referral, EmpowerEd Foundation is advised to refer the child to the relevant authorities.

7) Abusers

a) Both adults and children are potential abusers of children. ii. Abusers seek to access children through sport, leisure and residential work and so.

b) Abusers are rarely strangers. In most cases, they are those known to the child.

8) Implementation of the Policy: EmpowerEd Foundation commits itself to take all the efforts to implement the CPP in safeguarding children/young adults by the following means:

9) Awareness: Ensure that all staff, volunteers and others to whom this policy apply are aware of the issues relating to child abuse and the risks to children/young people.

10) Prevention: Take measures to prevent by creating awareness and personal and professional conduct, that staff and others make efforts in reducing the risk to children/young people.

11) Reporting: Ensure that staff and others follow the procedure laid down in CPP and abide by the mandatory reporting where concerns arise regarding the safety of children/young people.

12) Responding: Ensure that action is taken, without denying procedural fairness principles to the accused, to support and protect children/young people where concerns arise regarding possible abuse. In order that the above standards of reporting and responding are met, EmpowerEd Foundation will ensure that it:

- takes seriously any concerns raised;
- takes positive steps to ensure the protection of children/young people who are the subject of any concerns;
- supports children/young people, staff, or other adults who raise concerns or who are the subject of concerns;
- acts appropriately and effectively in instigating or co-operating with any subsequent process of investigation;

- demonstrates responsibility to and respect for children/young people by being sensitive in our communications that involve them; and
- is supported by stringent recruitment and selection measures that have been designed to minimize the possibility of recruiting persons who may pose a risk to children/young people.

9. Child Protection in EmpowerEd Foundation

a. Ensuring high Standards in Child protection

As EmpowerEd Foundation expresses the loving heart of God and the passion of the founder Dr. George Samuel, we are called on to care for and respect children in all EmpowerEd Foundation activities. Therefore, EmpowerEd Foundation will take steps to ensure that:

01. Children are treated with dignity. Favouritism, harassment and discrimination will not be tolerated within any EmpowerEd Foundation activity.
02. A child's right to privacy is respected.
03. No inappropriate physical contact with children will ever be tolerated.
04. Activities do not exploit gender, physical, cultural or intellectual differences but give positive messages about human diversity.
05. Discipline will be worked out in the context of love. The guiding values will be forgiveness and restoration. Discipline will never involve humiliation either in private or in public.
06. Alcohol and illegal or inappropriate drugs are prohibited from any EmpowerEd Foundation activity and serving children alcohol, medications or other psychoactive substances are strictly prohibited and any violation would be considered as criminal offences.
07. As a general rule, EmpowerEd Foundation condones any illegal activities involving a child.
08. All EmpowerEd Foundation leaders (staff and volunteers) are trained to engage in appropriate behavior towards children and to recognize and address peer abuse i.e. abuse of children against each other.
09. All EmpowerEd Foundation staff and volunteers are familiar with procedures to adopt when a child discloses abuse or a person alleges abuse at a EmpowerEd Foundation

event. They understand their obligation to report immediately any suspicions or allegations relating to abuse or harm or any disclosures a child may have made. This includes child-on-child abuse.

10. All EmpowerEd Foundation staff and volunteers understand their obligation to disclose any previous experience that might potentially disqualify them from working with children.
11. EmpowerEd Foundation shall publish or announce a dedicated mobile /landline number/email ID assigned for registering the complaints any time during when the programs are conducted.
12. EmpowerEd Foundation shall appoint counselors to help the child in need of counseling. Child helpline number may be assigned and the number shall be provided to the children for their further counseling /assistance.

b. Child Protection Code of Conduct for all EmpowerEd Foundation staff

EmpowerEd Foundation expects its leaders to uphold high standards of conduct toward children and toward one another, consistent with their position as positive role models and friendship-builders.

EmpowerEd Foundation leaders will agree to high standards of behavior towards children and will:

01. Never allow or engage in any inappropriate touch. They will avoid close or prolonged physical contact with children.
02. Never make sexually suggestive remarks or gestures to a child or play sexually suggestive games.
03. Never act in ways that shame or belittle children.
04. Never use offensive or abusive language.
05. Never allow children to use offensive or abusive language unchallenged or to engage in bullying or other abusive activities towards other children. This includes child-on-child abuse that involves social media e.g., cyber-bullying or transmission of inappropriate photos or messages through phones or through any source.
06. Never abuse and/or exploit a child or act/ behave in any way that places a child at risk or harm.

07. Never discipline a child by use of physical punishment including striking a child or depriving a child of food or bedding. Physical restraint may be used when a child is in danger or if a child's actions/ behavior might potentially cause harm to another person.
08. Never do things of a personal nature for children that they can do for themselves.
09. Never spend time alone with a child (or small group of children) away from others. Always make sure that any interactions are within view of others.
10. As a general rule, never counsel a child of the opposite gender alone. xi. As a general rule, never enter the changing or sleeping accommodation of children of the opposite gender. This is especially important with older children.
11. Ensure that all interactions with children occur in such a way that the leader's intentions could not be misconstrued by the child or others. All communications between children and leaders should be open, transparent and non-exclusive. Never talk with a child or children behind closed doors.
12. If individual contact seems appropriate for a particular reason, then the parent/s and relevant EmpowerEd Foundation senior leader should be consulted. This also applies to internet/email, fixed or mobile phones and all social media contact.
13. EmpowerEd Foundation prohibits to establish sexual relations with children and exhibit sexually provoking behavior;
14. EmpowerEd Foundation prohibits staff/volunteers hosting the child in their own private home;
15. Never maintain a private relationship with the child, outside the framework of EmpowerEd Foundation activities.
16. Never accompany the child during travel in the absence of any caregiver; As a general rule, mixed groups have male and female leaders. This is especially important in residential activities.

c. Child Protection Code of Conduct for all Volunteers /Outsourced Personnel

01. The volunteers/Outsourced Personnel shall not attend visit or meet the children without the prior permission of the Director /Leaders
02. The volunteers/Outsourced Personnel shall not engage in any activities that are

detrimental to the organization and to the children.

03. Volunteers/Outsourced Personnel shall not visit the children or the schools and misuse the name of the organization for their personal gains.

04. Any violation of the provision of this CPP shall be considered as criminal offense and shall be liable for appropriate legal action.

05. As a general rule, EmpowerEd Foundation prohibits staff/volunteers sleeping/resting in the same room with children during summer camps, retreats, training or any other special events more particularly with the opposite sex.

06. Never be alone in the room with the child even during the counseling, the counseling may be conducted in the public places or in the presence of school teachers in case it is a school or in the midst of any third persons.

d. Child Protection in EmpowerEd Foundation communications

All communication—such as stories, articles and images—must protect the dignity and privacy of children.

01. Caution is to be exercised at all times in the use and distribution of photographs of children who have participated in the events especially where we have no control over end-use (e.g. On websites).

02. Legal requirements especially with regard to parental permission must be known and adhered to.

03. Prior intimation should be made and written permissions obtained for pictures or videos taken at a EmpowerEd Foundation children's activity being circulated on social media.

04. Pictures and videos of children saved on mobile phones and any other devices shall be strictly prohibited.

05. All the above-mentioned aspects are part of the media policy of EmpowerEd Foundation and hence shall apply to all communication in and through EmpowerEd Foundation in any form.

e. Guideline for the partners / faculties/ trainers / visitors / guests / customers / vendors / outsourced personnel

EmpowerEd Foundation expects all guest to be in modest dress. EmpowerEd Foundation feels more comfortable if guests avoid wearing shorts or very short skirts and plunging necklines. Long skirts and loose tops are best.

01. EmpowerEd Foundation lets the guest gentlemen know of these tips before they come to visit our place. Gentlemen should never touch a child/woman unless she is his mother, his wife or his daughter! **NO HUGS ever!!**
02. Offering a handshake is fine, man-to-man, but men should avoid offering their hands to the ladies. The traditional Indian custom of putting palms together is the nicest way to greet and take leave of people.
03. EmpowerEd Foundation does not allow guests to pray personally for an individual, or by laying hands on a person or communicate through any form of written communication or telephone conversation with the child.
04. Photography or videography of the EmpowerEd Foundation event by the guests/visitors is strictly prohibited.
05. The vendors and outsourced personnel shall be educated on the EmpowerEd Foundation's CPP policy.
06. All those regular vendors shall be obligated to sign the declaration about the compliance of the EmpowerEd Foundation's CPP.
07. The vendors shall not enter the places allotted for the children during the camps/training or any other events.
08. The vendors shall be allowed to enter the storeroom or the kitchen or any other places connected with their service only when the in-charges of the storeroom or the kitchen are present.
09. The vendors shall not be allowed to stay in the premises for a longer time unnecessarily.
10. Except in the extra ordinary situation the vendors shall be allowed to enter the premises only during the office hours and not later than 6 pm in the evening.
11. Vendors and outsourced personnel shall have to sign in the register while checking in and out along with the timing.

f. Instruction for school /camps/training / field visits / tuition centers

01. Whenever an EmpowerEd Foundation program is conducted in the school /any area identified by the EmpowerEd Foundation, the staff /volunteers of EmpowerEd Foundation shall be accompanied by the female staff /volunteers.
02. A written consent shall be obtained from the school /parents/ authorised persons for conducting the EmpowerEd Foundation programs in the premises of school /any residential /community halls.
03. As a general rule, the phone numbers/email id's, individual photos of the children shall not be taken by the staff /volunteers, when the staff or the volunteer feels that child is in need of regular counseling. She /he may be asked to contact the counseling centres in the EmpowerEd Foundation.
04. Staff /volunteers shall not visit the houses of children for any purpose in odd hours. Such visit shall be made with prior information to the family members or when two or more family members are present.
05. Visiting the child when she/he is alone at home is strictly forbidden.
06. The staff /volunteers working in the tuition centers shall take due care for both boys and girls attending the coaching class.
07. The staff /volunteers shall inform the parents whenever the coaching class are extended than the regular timing.
08. The staff /volunteers shall obtain the written consent from the parents whose children are admitted for the tuitions.
09. The staff/volunteers shall not use the children for doing any of their personal works.

10. Limitation on Photography, Electronic Communication & Social Media

a. Child Picture:

01. Pictures, images, or other likenesses of children/young people and/or information related to children/young people that could compromise their care and protection will not be made available through any form of communication media, metadata, or text

descriptions.

02. Images with corresponding text which may identify a child must be removed.
03. Images of children/young people require informed consent from the child and parent or guardian before photographing or filming a child/young person and published and should not be accompanied by detailed information relating to their place of residence.
04. The EmpowerEd Foundation staff/volunteers shall not circulate/post individual photos or any other details pertaining to the children in their personal ID's in the social media or in the personal whatsapp groups.
05. The EmpowerEd Foundation staff/volunteers are prohibited from storing the individual photos of any child taken during the EmpowerEd Foundation camps or training or any other programs conducted on behalf of the organization.
06. Images should always portray children/young people in a dignified manner.

b. Data confidentiality:

EmpowerEd Foundation abides by the laws regulating data protection, sensitive data in particular, by:

01. obtaining written consent from partners/schools/faith-based organizations, etc. regarding personal data of the children.
02. appointing an individual responsible for data protection;
03. training staff;
04. securing documentation, both electronic and in hard copy;

11. Safety & Care

i. Ensuring High Standards in Safety

EmpowerEd Foundation activities create fun and adventure for children. At the same time, we are committed to practices that keep all children safe from potential danger. Therefore, it is our responsibility to know the risks attached to any activity and to make appropriate decisions about managing those risks. Our obligation is to implement high standards of preparation and care in

all activities. This means that in all activities, EmpowerEd Foundation will take steps to ensure that:

01. The facilities used meet minimum safety standards required by law and by our own obligation to keep children safe.
02. There are adequate safety precautions and supervision at all times as required by law and our own obligation to care. All equipment used by or around the children are kept in good condition and regularly checked for safety.
03. Consent/permission forms are signed by parents/guardians whenever appropriate.
04. The risks involved in any child-related activity have been considered carefully and appropriate action has been taken to minimize risk or change the activity.
05. Safety procedures to follow in case of fire, accident or location-specific hazards are in place and all leaders are familiar with them
06. Government health policies that relate to infectious diseases are known and followed.
07. A first-aid policy is in place that includes:
 - a. Requesting of relevant medical information for children on residential activities.
 - b. Nomination of a leader on each activity who will take responsibility for medical issues. This person may not be a health professional but should have some basic training and can act in a limited capacity.
 - c. A First Aid kit in a place / position accessible to leaders.
 - d. A plan for accessing immediate appropriate medical help if a child has suffered injury or acute illness. Leaders will ensure that parents are informed and supported where such situations occur.
 - e. An emergency response plan for crisis or trauma situations is formulated. This will outline action to be taken so that support is provided both for the children and leaders affected and for the families of those impacted, including in the hours and days following a trauma, and longer if necessary.
 - f. All transport safety codes relating to seat belts, speed, number of passengers, qualifications of drivers, and insurance and road worthiness of vehicles are honored.
 - g. High standards of hygiene are observed in:

- i. Food preparation and serving
 - ii. Cleanliness of all facilities
- h. Appropriate levels of public liability insurance are in place and that all requirements of insurers are fully met.

ii. Safety Code of Conduct for all EmpowerEd Foundation workers

EmpowerEd Foundation expects its leaders, staff, volunteers and others to uphold high standards of safety in any activity involving children, consistent with their position as guardians in the absence of parents or caregivers. EmpowerEd Foundation Leaders agree that they will:

01. Always take note of potential risks and plan for their management so that agreed and legal standards are complied with.
02. Always safe guard children from unnecessary danger in away that is appropriate to the level of risk and to the age and competence of the children.
03. Never leave children without adequate adult supervision.
04. Never force a child to undertake an activity.
05. Always promote positive interaction among children, intervening when a child's behavior might place others at risk.
06. Always ensure that, at the end of any activity, a child is not left to wait alone for parents/guardians.
07. Be familiar with and follow agreed procedures in the case of a traumatic situation.

iii. Recruitment Procedure for staff and Volunteers

Healthy relationships are the foundation of EmpowerEd Foundation activities. Nevertheless, we are aware that there are those who might seek to use EmpowerEd Foundation activities to exploit children. To minimize this possibility, EmpowerEd Foundation will commit to these careful guidelines in the recruitment of its staff and volunteers:

- Independent character references are checked with careful consideration given to issues of confidentiality and privacy.

- Legal/police checks are obtained (where possible or legally required).
- Acceptance is conditional upon the person signing a written statement that they have understood and agreed to comply with the Child Protection Policy. This copy is to be held on record.
- In addition, in the case of staff recruitment, EmpowerEd Foundation will conduct an interview that establishes the appropriateness of the person working with children and/or teenagers. As a safeguard, evidence of experience, character and qualifications will be explored and enquiries made about any concerns.
- All legal requirements will be complied with.

As EmpowerEd Foundation's primary responsibility is for the welfare of the child, no one with a known previous history of paedophilia, child abuse or similar offences will be recruited.

12. CPP Developing & Implementation

It is ultimately the responsibility of the EmpowerEd Foundation Board to make sure that a Child Protection policy, appropriate to their context and including the minimum standards set out in this guideline, is adopted and implemented within their movement. This will include:

I. Developing a Policy

EmpowerEd Foundation has developed this policy and adopted a Child Protection Policy based on the minimum standards prescribed by the Indian government. EmpowerEd Foundation's CPP policy shall be modified whenever there is a change & amendments implemented by the government.

II. Developing a Strategy

EmpowerEd Foundation shall take all the measures in developing the strategy that will involve:

- Developing appropriate systems and procedures
- Making changes to document set to ensure that they comply with new standards
- Training of all staff and volunteers both in the initial adoption of the policy and as an ongoing requirement.

III. Regularly Reviewing and Improving Policy

Beyond the adoption and implementation of a CPP policy, EmpowerEd Foundation should ensure on-going monitoring for compliance, as well as a regular strengthening of their Child Protection Safety and Care capacity in a planned and systematic way. In particular this will involve:

- Evaluation of their CPP practice at regular intervals after implementation.
- Further training for staff and volunteers in the CPP standards.
- Further development of systems, procedures, equipment and properties (such as training locations), to ensure high safety and other standards. (For example, an EmpowerEd Foundation movement may decide that during the next year, all field staff are trained in basic first aid as a matter of policy, and/or food preparation as practices at training locations will be improved soon).
- Encouraging a culture that promotes continuous awareness of risk and how it can be managed in all EmpowerEd Foundation activities.

13. Dealing with Incidences of Abuse

I. Procedures for Addressing Disclosures:

Child abuse is distressing for all concerned and it is often difficult to accept that it may have occurred. Failure to do something may result in a child continuing to be abused and/or exploited and on occasions may even result in serious repercussions for the child. Usually, the abuser is someone close to the victim and whom the child has trusted. To ensure that EmpowerEd Foundation commitment to safeguarding the children and promoting their rights is upheld, it is essential that anyone connected with EmpowerEd Foundation who suspects or knows of abuse, both minor and major incidents, raises their concerns in line with the process identified within this policy. The principle of 'best interest' of the child and the desire to secure the best outcomes for the child should always govern decisions regarding what action to take in response to concerns.

All allegations, beliefs or suspicions of policy non-compliance or breach of code, sexual, physical or emotional abuse, exploitation, or neglect (past or present) by EmpowerEd Foundation staff

member, volunteer, consultant, donor, partner or board member to be reported immediately to the CEO/Director. Appropriate professional advice will be sought. Incident reporting of breaches of the code, policy noncompliance, abuse or exploitation is compulsory.

A child/young person reporting an incident must be taken seriously and listened to carefully. Once an allegation is made there should be an immediate response that protects the child/young person from further potential abuse or victimisation. The family of the child/young person victim should be informed of the allegation and action proposed and they should be consulted where possible as to the process to be followed.

When concerns arise, all parties will be directed through a formal complaints process by the **Director**, or any senior leader duly designated by the **Board**. Such person may consult with legal counsel and/or police authorities where appropriate and steer the investigation process accordingly within one week (including Saturday and Sunday) but not exceeding 10 days. In the event that the CPP Code of Conduct is broken, EmpowerEd Foundation will pursue disciplinary action and/or termination of employment. Additionally, allegations and charges of child abuse and exploitation will be immediately reported to relevant partners and donors.

II. Responding to Disclosures:

Disclosure of abuse may come directly from the child. In such circumstances, it is important to respond in a calm, caring and supportive manner. The child is never to blame in situations of abuse and should be reassured that they have done nothing wrong, either in relation to the abuse itself or in reporting it. Children need to know that you are listening and taking seriously the information that they divulge and that you will respond positively to ensure their future protection.

It is important to record what is said – at the time if appropriate, or as soon as possible following the disclosure. It may not be appropriate to enquire into the details of the abuse at this stage. It is important to listen and respond positively to the child and be supportive without asking leading questions. The child also needs information and an explanation of what will, or is likely to, happen next.

- The **Incident Investigation Committee (IIC)** must investigate the case of any such

incident of abuse.

- After validating the complaint, the Management Committee must immediately inform the EmpowerEd Foundation Board through the Director of EmpowerEd.

If the incidents are of low risk, the IIC would follow the laid-out procedures in handling the case. IIC shall be accountable in the best interests of fair play and justice to ensure impartiality and neutrality during validation and investigation of complaints. Right of appeal is ensured. The EmpowerEd Foundation Board of Trustees has the final responsibility for the implementation of the Child Protection Policy and for the adherence to the policy and practiced across EmpowerEd.

II.a. Distance the alleged perpetrator

The best interests of the child/young person may warrant the standing down of the alleged perpetrator during an investigation. A person who has stood down will receive full pay and is entitled to a just process that does not presuppose guilt or innocence. The allegations should not be discussed or communicated to any person outside the process until a final outcome is known. The reasons for a decision to enforce that a person stands down must be fully documented

II.b. Reprisal

EmpowerEd Foundation will not tolerate any form of coercion, intimidation, reprisal or retaliation against any staff member, volunteer, or consultant who reports any form of abuse or exploitation, provides any information or other assistance in an investigation.

III. Reports of abuse against EmpowerEd Foundation Staff /volunteers /Associates

The Protection of Children from Sexual offences Act 2012 section 5 (e) considers any sexual abuse/assault as aggravated penetrative sexual assault committed by a person in a position of trust or authority of child i.e. whoever being on the management or staff of a hospital, whether government or private commits penetrative assault. Section 5(f) defines about the whoever being on the management or staff of an educational institution or religious

institutions, commits penetrative sexual abuse on a child in that institution. Rigorous imprisonment is imposed if a person is convicted. The recent amendment of 2019 to POSCO Act has approved the maximum punishment of death penalty. When allegations of possible abuse may be made against individuals working within EmpowerEd/ volunteers and visitors or any other personnel of EmpowerEd.

III.a. Disclosure by a Child: Procedures to follow

If a child discloses any kind of abuse (relating to home, school, EmpowerEd) to any member of EmpowerEd, there are certain procedures that must be followed by all involved:

01. Do not promise confidentiality to the child—always let the child know as soon as the conversation begins, that someone else will need to be told.
02. If the child wishes to continue, listen calmly.
 - a. Do not pre-judge or trivialize the issue.
 - b. Do not ask leading questions or make the child repeat the story unnecessarily.
 - c. Assure the child that he/she has not done anything wrong.
03. Act immediately: the person to whom the disclosure has been made should report it to a more senior leader who has specific Child Protection responsibility, who will then decide on necessary action. Support the child as far as possible. It is a process that is traumatic, and the child may experience mixed emotions and loyalties that require understanding. This may mean that specialist help is sought to provide maximum child and family counseling services.
04. Those who are informed of the disclosure should maintain strict confidentiality.

III.b. Document the incident

Document the incident as soon as possible (within a period of 24 hours of the disclosure), the person receiving the disclosure must fully document the allegation, including the time, place, witnesses on the Incident Report. This report will be used as the basis for investigation and possibly used in court if charges are forthcoming. The person responsible for reporting this information should refrain from taking notes in front of the child who is disclosing.

III.c. Complaints about Abuse in a EmpowerEd Foundation activity: Procedures to follow

Where a EmpowerEd Foundation leader at a EmpowerEd Foundation activity/event is accused of anything other than a minor issue:

01. That person should be withdrawn from the activity until the nature of the situation is clearer and further action has been decided upon. The person will be treated with respect and fairness and will be presumed to be innocent unless and until proven guilty.
02. The person making the allegation will be interviewed by EmpowerEd Foundation leaders with special CP responsibility.
03. If the complaint appears to be founded:
 - a. The Director or senior person designated by the Director will ensure that any concerns or issues are addressed effectively and referred to any relevant authorities as required by law.
 - b. If the person is shown to have committed an act of sexual or serious physical or emotional child abuse, that person will no longer be permitted to be on any EmpowerEd Foundation activities or to hold any EmpowerEd Foundation office. This disciplinary action is in addition to any legal action that might be taken. We believe that the community expects of us a serious and on-going role in seeking to ensure that offenders are held accountable for what they have done, while at the same time respecting the person's right to confidentiality.
 - c. Support will be offered to the child and family involved.
 - d. Others in the EmpowerEd Foundation and wider community may need to be offered support to deal with the situation.
04. If the complaint is proved to be unfounded, EmpowerEd Foundation will do all in its power to clear the name of the person involved. EmpowerEd Foundation is committed to safeguarding all who work with children from the consequences of unfounded allegations.

The Director or a senior person designated by the Director must be involved from the beginning. In-depth interviews should not be conducted until all legal requirements are known and specialist help is sought. Where the Director is the person who is the subject of the allegation, the Chair of the EmpowerEd Foundation Board will take responsibility for proceeding with the case. Where

it is observed that a child appears to have symptoms of serious neglect, the Director or a senior person designated by the Director is advised to refer this to relevant respected authorities.

Thorough investigation is made by the IIC, the enquiry to be conducted in fair and transparent manner without being biased. After the thorough investigation, complaint has to be lodged with the local police station. While lodging a complaint the below process has to be kept in mind.

III. d. Essential of process of enquiry of child abuse:

01. Recording the statement of the child at the residence of the child or at the place of her choice, preferably by a woman police officer not below the rank of sub-inspector.
02. No child to be detained in the police station in the night for any reason.
03. Police officer not to be in uniform while recording the statement of the child.
04. The statement of the child to be recorded as spoken by the child.
05. Assistance of an interpreter or translator or an expert as per the need of the child may be used.
06. Assistance of a special educator or any person familiar with the manner of communication of the child in case the child is disabled may be used.
07. Medical examination of the child to be conducted in the presence of the parent of the child or any other person in whom the child has trust or confidence.
08. The medical examination shall be conducted by a woman doctor if the child is female or by a male doctor if the affected child is a boy.
09. Frequent breaks to be given for the child during trial. Child not to be called repeatedly to testify.
10. No aggressive questioning or character assassination of the child in camera (means in a closed room) trial of cases.
11. The Act recognizes that the Intent to commit an offense, even when unsuccessful for whatever reason, needs to be penalized. The attempt to commit an offense under the Act has been made liable for punishment for up to half the punishment prescribed for the commission of the offence.

12. It is highly important not to disclose the personal details like name and identity of the child to the media or in any of the social networks.

IV. Confidentiality

Maintaining confidentiality is of paramount importance. In responding to issues and concerns regarding possible abuse, staff and others must exercise extreme vigilance in protecting information and only pass on information to those who need to be involved via the specified reporting process.

14. Child Safety in Online Programs

While technology and online connection can be an effective tool for social organization, certain checks and balances are needed to ensure all participants are kept safe. The online environment can be particularly susceptible to the grooming and exploitation of children. As our organization works closely with children and young people, relationships and trust are developed. This requires us to plan and implement good policies and procedures to mitigate against these additional risks. EmpowerEd Foundation considers any national regulations on digital safety and data protection and comply with any requirements that may protect children. Child safety online is applicable wherever information and communication technologies are involved. This includes:

- Texting or messaging apps (e.g., WhatsApp, Messenger, Snapchat, Signal, Telegram)
- Video programs (e.g., Zoom, Skype, Microsoft Teams, Google meet)
- Broadcasting or streaming (e.g., YouTube, Facebook Live) - Social media platforms (e.g., Facebook, Instagram)

This could cover online activities, such as: online camping, virtual meetings, connecting with small groups, broadcasting a program, training and schools' groups.

Guidelines for safe practices online:

- A. All staff and volunteers leading on programs need approval: As with face-to-face interactions with children, all leaders need to be screened, police checked where possible, referee checked and to have signed a specific code of conduct for online

activities. All leaders will need training in Online Child Safety before leading on an activity.

B. The online program requires approval:

- Leaders need to have pre-approval from the EmpowerEd Foundation Board of Trustees to set up and run an online meeting, training or group.
- When working in partnership with a school or organization, EmpowerEd Foundation is required to ensure online safety protocols are followed before the program is approved.

C. Gain parental permission:

- Parents/caregivers need to be fully informed of the details ahead of the event including the leaders involved, the purpose, assurances that safety protocols are in place, and who to contact with concerns or feedback.
- In the case of younger children (under 16 years), all initial communication needs to be with the parent or caregiver, not the child. Send a meeting invite to the parent/caregiver's email address/mobile and they can then set up the event using the child's email address, if the parent/caregiver chooses, and if there are no age restrictions on the child's email address being used for this purpose. If the parent/caregivers email address/mobile is unknown, then it may or may not be possible for a group to continue online. Older children can be contacted directly by formal email from a professional (not private) EmpowerEd Foundation account, but parental/caregiver consent will still be required.
- Parental consent needs to be in writing. This may be via email or other electronic means. This needs to be kept as a record.
- Permission needs to be gained before posting any examples of students' work or photographs on any social media platform. Parental permission shall be obtained also to record the session.

D. Running a EmpowerEd Foundation programme online:

- Choose an approved and secure site. Take note that some platforms have age restrictions (e.g., WhatsApp is 16 years and over). Not all technology is secure and can lead to unwanted information sharing.
- Create an EmpowerEd Foundation account. Avoid using personal accounts for

online interactions.

- Create a registration process that includes a login and password. Create a waiting room so that only those registered will be allowed access. Have a plan in place should an unwanted person somehow gain access to the programme. Ensure the host has the ability to limit or remove participants who engage in inappropriate language or posting. Require all participants to identify themselves with their first and last name.
- Restrict the features on the call, e.g., limit the group chat or instant messaging features, restrict the ability to share screen or video/audio content. Where possible have these features only available to leaders and older aged participants where appropriate.
- Preview all images, videos, website links, social media content and presentation slides beforehand to check for appropriateness. Check that language and content is appropriate for the age group participating.
- Choose an appropriate time of day for your event.
- One-on-one engagement is discouraged, as this is the equivalent to having a conversation with a young person in a room alone. Use breakout rooms with discretion. They are best avoided where there are not two leaders available for each breakout room. Ideally mixed groups should have a female and male leader.
- Ensure that there is a procedure in place if something goes wrong. This could include a participant or leader acting in an abusive or inappropriate manner, or an allegation of abuse is made. Provide emergency contact details. The same procedure is followed as for a face-to-face interaction.

E. Code of Conduct:

- A code of conduct for all leaders will include:
 - i. Signing that they have read and understood the Child Protection Policy of their movement, including online safety.
 - ii. Expectations for online behaviour:
 - 1. Any personal contact from a leader with a child on social media is to be avoided. This includes accepting or turning down friend

requests, direct messaging, following or poking children and initiating conversations, live chats, inviting them to live events on social media or liking their posts, etc.

2. There shall not be private messaging or sharing of personal details with a child. There shall not be any contact with the child outside of the program without parental and EmpowerEd Foundation consent.
3. Expectations for an appropriate standard of dress and awareness of the need for an appropriate background to any online interaction must be adhered to. For example, there should not be a bed or bathroom visible on their screen.
4. All leaders will act in a manner fitting with their calling as ambassadors and be above reproach.

F. Establish expectations for participants in online activities:

- Communicate with participants prior to the event the behavioural expectations, including standards around cyber bullying. Reinforce this at the beginning of the event.
- Ensure there is a good process for participants to discuss should they feel uncomfortable or want to report an incident.

G. Maintain good records:

- Ensure a written record is kept of all video calls or programs, who attended, and the leaders involved.
- If a recording is kept of the session or the group chat is saved in Zoom, please consider where this is saved and who has access to it.

15. Amendments

This policy will be reviewed as often as required to take into consideration the legal, social, educational, financial and any other developments. A committee consisting of 3-5 members shall be constituted under the leadership of the Director which will go through the content of the policy and offer its recommendations for amendments to be approved finally by the

EmpowerEd Foundation Board of Trustees. The staff, volunteers, Board Members, etc. shall be sufficiently oriented on the changes.

16. Annexures

A: Role of Incident Investigation Committee (IIC)

- To receive complaints from any sources, including opening complaints box once in a week.
- To register the complaints in approved format.
- To carry out validation of complaint as per approved format. To exercise discretion while validating complaints, a detailed report may be submitted to the EmpowerEd Foundation Board of Trustees considering that low risk, medium risk and high-risk violations may be detected from time to time, which have to be updated in Annexure 'B' – Severity Scale of Child Protection Violations of Child Protection Policy, the status of which is always to be deemed dynamic.
- After validating a High-risk complaint, the EmpowerEd Foundation Board of Trustees, to immediately inform the Director in writing.
- To take prompt and corrective remedial action for violations reported in the Low Risk and Medium Risk categories as per Annexure 'B' – Severity Scale of Child Protection Violations of Child Protection Policy.
- The IIC shall be accountable in the best interests of fair play and justice to ensure impartiality and neutrality during validation and investigation of complaints.

B: Severity Matrix

Category	High	Medium	Low risk
Physical abuse	External injuries like ruptured eardrum, concussions on head, black eyes, wounds, cuts, bruises and fractures	Corporal punishments, hard labour, kicking	Slapping, twisting ears, canning, sit-ups, kneeling and hair pulling

	Internal injuries requiring doctors attention, death	Bullying among children	Depriving a meal
Sexual abuse	Rape, forced to have lesbian relationship, exposure to pornography, penetrative sexual assault and sexual abuse, publishing or threatening to publish morphed photos or abusive statements in the social media	Touching a child inappropriately, use of obscene language vulgar dressing and gestures, seeking favours over social media, soliciting friendship in social media	Make any physical gestures in a manner that appears to be inappropriate, frequent calling, texting, unsolicited offers
Emotional abuse	Isolation, denying medical attention, depriving recreation	Belittling, bullying by adult	

Low risk: Matter to be resolved appropriately by the IIC.

Medium risk: Issue to be resolved appropriately through a task group and preventive measures to be in place to reduce the risk becoming high. Disciplinary actions if needed are to be enforced.

High risk: Complaint to be validated, investigation launched and recommendations leading to legal action as per the law.

C: Complaint form

Date:

Place:

To
The Child Protection Officer

Ref.No:
Date Received:
Complaint registered

.....

Source of complaint	Complaint box/phone/post/ oral(identify.....)/ anonymous/other.....
Date & time of violation	
Witness if any (adults & children)	
Identity of complainant, if any	
Details of the CP violation	
Who allegedly carried out the violation	
Is it the first time you have observed such a violation	Yes / No
If No, provide details of earlier violations	

EmpowerEd Foundation maintains a culture of honesty, trust, transparency, justice and neutrality while dealing with allegations and ensure that staff will not misuse this form to make baseless allegations. If you choose to divulge your identity, confidentiality is assured. Each reported violation will be investigated thoroughly with impartiality.

Name of the complainant (optional)