

POLICY FOR PREVENTION OF SEXUAL HARRASSMENT

SAFEGUARDING POLICY AND PROCEDURES

Content

- 1. Introduction**
- 2. Safeguarding Policy Statement**
- 3. Scope of Application of the Safeguarding Policy**
- 4. Legislation and Statutory Guidance**
- 5. Definitions**
- 6. What Constitutes Child Abuse?**
- 7. What constitutes Adult Abuse?**
- 8. Code of Conduct**
- 9. Measures to Safeguard beneficiaries.**
- 10. Reporting of a complaint to the designated Safeguarding Officer**
- 11. Handling of Reports of Abuse**
- 12. Implementation plan**

ANNEX 1 – PRO TSAHAN’s Safeguarding Code of Conduct.....16

ANNEX 2 – Incident Report Form.....19

1.Introduction

Founded in New Delhi in 2003 by professionals, Protsahan is a Charitable Trust committed to ongoing learning to cultivate the skills and values needed to promote the common good. Through **holistic education and character development**, we empower people to strengthen themselves and their families.

Protsahan inspires young women to take personal responsibility in helping those in need, fostering a spirit of service, and promoting a well-rounded education for all, regardless of caste or creed. The Core Values of Protsahan that are shared in all of its projects are the following:

- Genuine care and respect for the dignity of each person;
- High-quality training and personal attention;
- Commitment and spirit of service;
- Ethical conduct and transparency; and
- Fostering solidarity & social responsibility.

In every Protsahan project, we have fundamental concern for each of the persons involved. This means it is of prime importance to foster an environment conducive to building confidence and self-esteem and that avoids harm and abuse.

2.Safeguarding Policy Statement

At Protsahan, we are committed to ensuring the safety and wellbeing of everyone involved in our projects. **We have a zero tolerance for child abuse, as well as a zero tolerance for bullying, sexual harassment or exploitation, and abuse of any person.** The safeguarding policy covers children and adults in Protsahan training and development programs, girls and women who are students at the Kamalini Vocational Centre, or Vatsalya Study Centre and those who participate in any of the outreach activities organized by Protsahan, as well as the staff and volunteers of the Protsahan team and partners, wherever applicable, who run our programmes. Protsahan has adopted this Safeguarding Policy requiring our team and partners to conduct themselves appropriately with the participants and colleagues in Protsahan related programs and take reasonable measures to ensure their safety.

Our Safeguarding Policy supports this commitment. This policy aims to define the behaviors and actions that constitute abuse. Additionally, it will define our expectations for behavior, the scope of application of the policy and guidelines for reporting and redressal. Those who violate the applicable laws will be reported to the authorities.

3. Scope of Application of the Safeguarding Policy

3.1 The Policy is applicable to all full time and part-time employees of Protsahan, including but not limited to Kamalini Vocational Center and Vatsalya Study Centre teaching and non-teaching Staff, as well as Interns and Volunteers.

4. Legislation and Statutory Guidance

The Protsahan Safeguarding Policy is framed not only from our Core Values and Code of Conduct requiring the integral respect for every individual, but also within the applicable laws protecting women and children in the areas in which we carry out our work.

It is pertinent to mention some of the important laws which would be crucial for the working of Protsahan towards providing protection to the children and adults under its aegis.

- a) The Juvenile Justice (Care and Protection of Children) Act, 2015;
- b) The Protection of Children from Sexual Offences Act, 2012;
- c) The Information Technology Act, 2000;
- d) The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

5. Definitions

In this Safeguarding Policy, unless the context otherwise requires, the following terms have the meanings set out below:

- **“Adult”** is a person aged eighteen years and above.

- **"Child"** means a person below the age of eighteen years and the term **"Children"** shall be construed accordingly.
- **"Child-related laws"** means all the applicable Child-related statutes, by-laws, rules, regulations, notifications, circulars, ordinances, protocols, codes, guidelines, standards, policies, directions, judgments, decrees and orders of any government authority in India for the time being and from time to time in force. Such laws include the following:
 - a. The Protection of Children from Sexual Offences Act, 2012;
 - b. The Juvenile Justice (Care and Protection of Children) Act, 2015;
 - c. The Right of Children to Free and Compulsory Education Act, 2009;
 - d. The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986;
 - e. The Rights of Persons with Disabilities Act, 2016;
 - f. The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989;
 - g. The Bonded Labour System (Abolition) Act, 1976;
 - h. The Prohibition of Child Marriage Act, 2006;
 - i. The Immoral Traffic (Prevention) Act, 1956;
 - j. The Pre-Conception and Pre-Natal Diagnostic Techniques (Prohibition of Sex Selection) Act, 1994;
 - k. The Information Technology Act, 2000;
 - l. The Constitution of India;
 - m. The Indian Penal Code, 1860; and
 - n. The Code of Criminal Procedure, 1973.
- **"Complainant"** means a person reporting an incident of Child abuse or potential Child abuse or who alleges to have been subjected to any act of personal/sexual abuse or harassment in accordance with the procedures laid down in this Safeguarding Policy.
- **"Centre"** means the centre in New Delhi in which the Organization's programs are conducted and the term **"Centre"** shall be construed accordingly.
- **"External Partner"** means any organization working on child rights, prevention and redressal of child abuse and offence.
- **"IC"** means the Internal Committee for handling complaints and compliance.
- **"Incident"** means an incident of Child abuse or potential Child abuse or harassment of an adult and the term **"Incidents"** shall be construed accordingly.
- **"Organization"** means Protsahan, New Delhi having its **communications address** as F24 Hauz Khas Enclave, New Delhi 110016. The Kamalini Vocational Training Centre, a project of Protsahan is located at 33 Shahpur Jat, Ground Floor, New Delhi.
- **"Organization's workplace"** means:
 - a. All the offices and centres where the Organization's activities are conducted.
 - b. All the local communities where the Organization's representatives visit to

conduct the Organization's activities; and

c. Any other place where the Organization's activities (including trainings, meetings, surveys or field visits) are conducted or which is visited by the Organization's representatives on account of or during the course of their employment, engagement or association with the Organization, as the case may be (including any transportation provided by the Organization for undertaking the journey to and from such place).

- **"POCSO Act"** means the Protection of Children from Sexual Offences Act, 2012.
- **"Partner"** means partners are other organisations working together on programmes organised by Educational & Development Initiatives wherein the Partners operate independently with support and constant monitoring to achieve the agreed outcomes.
- **"Prevention of Sexual Harassment" (POSH)** refers to all laws of anti-sexual harassment, including Sexual Harassment of at the Workplace (Prevention, Prohibition and Redressal) Act, 2013
- **"Respondent"**: A person against whom a complaint of abuse or sexual harassment has been made by the complainant.
- **"Safeguarding"**: The proactive measures and policies implemented to protect the health, well-being, and human rights of individuals, particularly children and vulnerable adults, ensuring they are safe from abuse, harm, and neglect.
- **"Students"** mean both minor and adult participants in training and seminars conducted by Protsahan.

6. What Constitutes Child Abuse?

Child abuse or maltreatment 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 (Source: A report of the consultation on child abuse prevention, WHO, Geneva, 29-31 March 1999).

Protsahan staff, partners and volunteers must be aware of the following types of abuse and understand that the below mentioned acts or their attempt or abetment are strictly prohibited, as per this policy.

6.1. Physical abuse: The intentional or with knowledge use of physical force or assault against a child that results in or has a high likelihood of resulting in harm or injury for the child's health, survival, development, or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning, and suffocating.

6.2. Emotional abuse: Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, so that the child can develop a stable and full range of emotional and social competencies commensurate with his or her personal potential and in the

context of the society in which the child dwells. Acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other non- physical forms of hostile or rejecting treatment.

6.3. Neglect and negligent treatment: The ongoing failure to meet a child's basic needs, which can severely impair their health or development. This includes, but is not limited to, the lack of adequate food, clothing, shelter, medical care, supervision, and emotional nurturing. Negligent treatment refers to acts of omission or commission that fail to protect a child from harm or provide for their well-being in a manner expected of a responsible caregiver.

6.4. Exploitation: Commercial or other 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, grooming, child labour, trafficking and child prostitution. These activities are to the detriment of the child's physical or mental health, education, or spiritual, moral or social-emotional development.

6.5. Sexual abuse:

6.5.1. Sexual abuse is an act/conduct or behaviour which constitutes a sexual offence under *The Protection of Children from Sexual Offences Act, 2012*, and Indian Penal Code, 1860 as amended from time to time. Such sexual offences include penetrative sexual assault (including rape), non-penetrative sexual assault (including touching the private parts of a Child), sexual harassment (including stalking a Child, showing a Child pornography and making a Child exhibit his/her body), disrobing and using a Child for pornographic purposes (including storing of pornographic material involving a Child for commercial purposes).

6.5.2. An abetment of or an attempt and even conspiring to commit a sexual offence under *The Protection of Children from Sexual Offences Act, 2012* and Indian Penal Code, 1860 are also considered to be offences. Certain offences under *The Protection of Children from Sexual Offences Act, 2012* are aggravated offences and are subject to stringent punishments. For instance, sexual assault committed by persons in a position of trust or authority in relation to the Child (including relatives of the Child, persons managing or working in an educational institution, police

officers or public servants) are considered to be aggravated offences and attracts higher penalties.

7. What constitutes Adult Abuse?

Protsahan staff, partners and volunteers must be aware of the following types of abuse and understand that the below mentioned acts or their attempt or abetment are strictly prohibited, as per this policy.

7.1. Physical abuse: Any act of violence or force that causes physical harm or discomfort to an adult. This can include hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

7.2. Emotional abuse: Actions or words that cause mental anguish, fear, or distress. This includes threats, intimidation, humiliation, verbal abuse, isolation, or any other behavior that undermines an individual's self-esteem or emotional well-being.

7.3. Sexual Abuse: Any form of non-consensual sexual contact or behavior. This includes rape, sexual assault, inappropriate touching, or forcing an adult to participate in or witness any sexual acts without their consent.

7.4. Sexual Exploitation: Taking advantage of an adult for sexual purposes, often for financial gain or personal gratification. This can involve manipulating or coercing an adult into sexual activity, including through threats, bribes, or exploitation of vulnerabilities.

8. Code of Conduct:

All those covered by this Safeguarding Policy are expected to always conduct themselves in accordance with our Core Values, founded on respect for every single person, repeated here for reference:

- Genuine care and respect for the dignity of each person;
- High-quality training and personal attention;
- Commitment and spirit of service;
- Ethical conduct and transparency; and
- Fostering solidarity & social responsibility.

Protsahan staff, contractors, volunteers/interns and partners cannot harm or abuse children or

adults in any way. The violation of any of the expected actions below will be viewed seriously and appropriate action will be taken against the violator, depending upon the nature of violation. To confirm their agreement, all are expected to sign the Code of Conduct in Annexure 1.

| Expected Behaviour and Actions | Prohibited Behaviour and Actions |
|---|---|
| Treat every Person with empathy and respect, regardless of his/her race, colour, gender, sexuality, language, religion, religious belief, heritage, political/other opinion, national/ethnic/social origin or property/disability/birth/other status. | Do not use language or behavior towards others that is inappropriate, harassing, abusive, sexually provocative, demeaning, intimidating, offensive, discriminatory or culturally insensitive. |

| | |
|---|---|
| Listen to the others and respect their views. | Do not ignore any child or adult or look down upon their ideas or suggestions. |
| Ensure that physical contact with a beneficiary or colleague is respectful, culturally appropriate and essential to the purpose of your interaction | Do not use any form of corporal punishment on children or adults. Do not give any unwelcome physical contact to any person. Do not develop, induce or support physical or sexual relationships with Children, in any way. |
| Establish an atmosphere that fosters the development of Children through your actions and words. | Do not place a Child at risk of harm or abuse and do not harm or abuse any person physically, emotionally, mentally, or sexually. |
| Always take permission from Children and adults before taking their photos or videos. | Do not share with or show Children or any adult (electronically or in any other form) inappropriate content including pornographic material or material encouraging crime, violence, terrorism, racism, sexism, self-harm, suicide, cruelty and gambling. |

प्रोत्साहन ::

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| Keep all personal information about Children or their parents/guardians confidential and secure and ensure that such information is dispensed to only those individuals who are legitimately entitled to it. | Do not share personal information about Children or their parents/guardians, without their consent |
| | Do not use or encourage the use of alcohol, drugs, cigarettes or other intoxicating substances while interacting with Children and from providing such intoxicating substances to Children. |

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| | Do not develop any form of relationship or arrangement (financial or otherwise) with Children or adults which could in any way be deemed to be exploitative or abusive. Do not use Child labour in any form. |
| <p>Maintain appropriate boundaries while interacting with children and adults.</p> <p>Interaction with children should be in the presence of other adults or other children.</p> <p>If there is a legitimate cause to meet alone with a child, the office or room should have a glass door window, or a window, or the door should be left open.</p> | Do not meet children in isolated locations without the presence of other adults or other children. |
| Be alert to perceive if anyone is potentially suffering abuse, or if there is a risk because of near associations of any other member of the team or persons covered by this policy that could lead to harm to any Child or adult. | Do not "keep a secret" that could hide illegal actions by any colleague or person covered by this policy. Do not delay or fail to identify persons who could be a risk to others. |
| Report all the acts of physical, mental, sexual abuse and exploitation of either children or adults prohibited by this policy to ICC as soon as it comes to your knowledge | Do not close eyes to behavior that injures anyone around you. |
| Attend all the applicable training sessions and workshops on the Safeguarding Policy and Child-related and Prevention of Sexual Harassment laws conducted by the Organization. Ensure you implement lessons learned from such sessions and workshops. | |

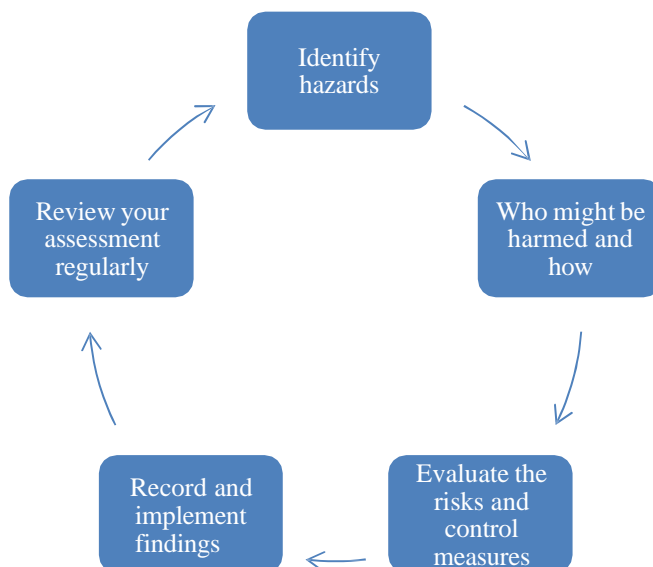
9. Protsahan Measures to Safeguard our beneficiaries and team and prevent them from harm or abuse

As a part of its policy, Protsahan is committed to carrying out risk assessments of any activities or projects which could pose risks to beneficiaries, and putting in place strategies to mitigate these risks. This will involve a careful examination of what in their area of work could cause harm to people so that they can assess whether they have taken enough precautions or should do more to prevent harm. The staff could use either of the following tools – an assessment form or an assessment flow chart, and then propose the adequate strategies.

Assessment form:

| Activity | Hazards/risks (something that can cause harm) | Who might be harmed? | Existing measures to reduce risk | Reassess risk, identify action(s) needed to reduce risk to acceptable level. |
|----------|---|----------------------------|---|---|
| | | | | |

Assessment flow chart:





Safe Environment:

Our activities are designed to help the well-being and development of the persons we work for. Therefore, we structure all of our activities in a context that is safe, open, supportive of persons of all situations without exclusion. All classrooms and offices have glass windows to facilitate that all interactions are open and respectful of persons at all times. Even individual mentoring and career guidance activities are conducted in rooms where a private conversation can be observed easily by others for the safety and

respect for dignity of others. Conveyance of students, staff, and volunteers by the organisation is only done in groups or in chaperoned vehicles for the safety of beneficiaries. Students training projects will be in safe, open places in teams as appropriate.

Safe and Respectful behaviour

Protsahan makes sure that all who join our team or work in our projects and the partners that we engage with for different interventions know and conduct themselves according to our Core Values and Code of Conduct.

On-Boarding Staff and Interns and On-going Awareness Training

Safeguarding is included in Protsahan recruitment, to avoid recruiting staff, volunteers, interns, partners Board members or contractors that may cause harm. There will be a statement in job adverts and job descriptions describing how the role needs to meet the Safeguarding Policy and Procedures, and those who join the organization must sign the Code of Conduct statement.

10. Reporting of a complaint to the designated Safeguarding Officer

Incidents are to be reported immediately using the form attached as Annex 2 and submitted to the Safeguarding Officer.

The Safeguarding Officer for Protsahan also serves on the Internal Committee for prevention of sexual harassment, named in the POSH policy of Protsahan. All matters will be handled rapidly and confidentially, with respect for the dignity and privacy of all persons involved. In the following section are criteria for investigation, care for beneficiaries involved, and redressal and evaluation of criteria to avoid harm.

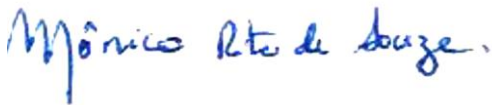
For the period of 2025-2027, the Safeguarding Officer designated is:

Monica Rita D' Souza, Trustee

Naomi T Jose in her absence

This updated policy is approved to take effect as on the **10th January 2025**.

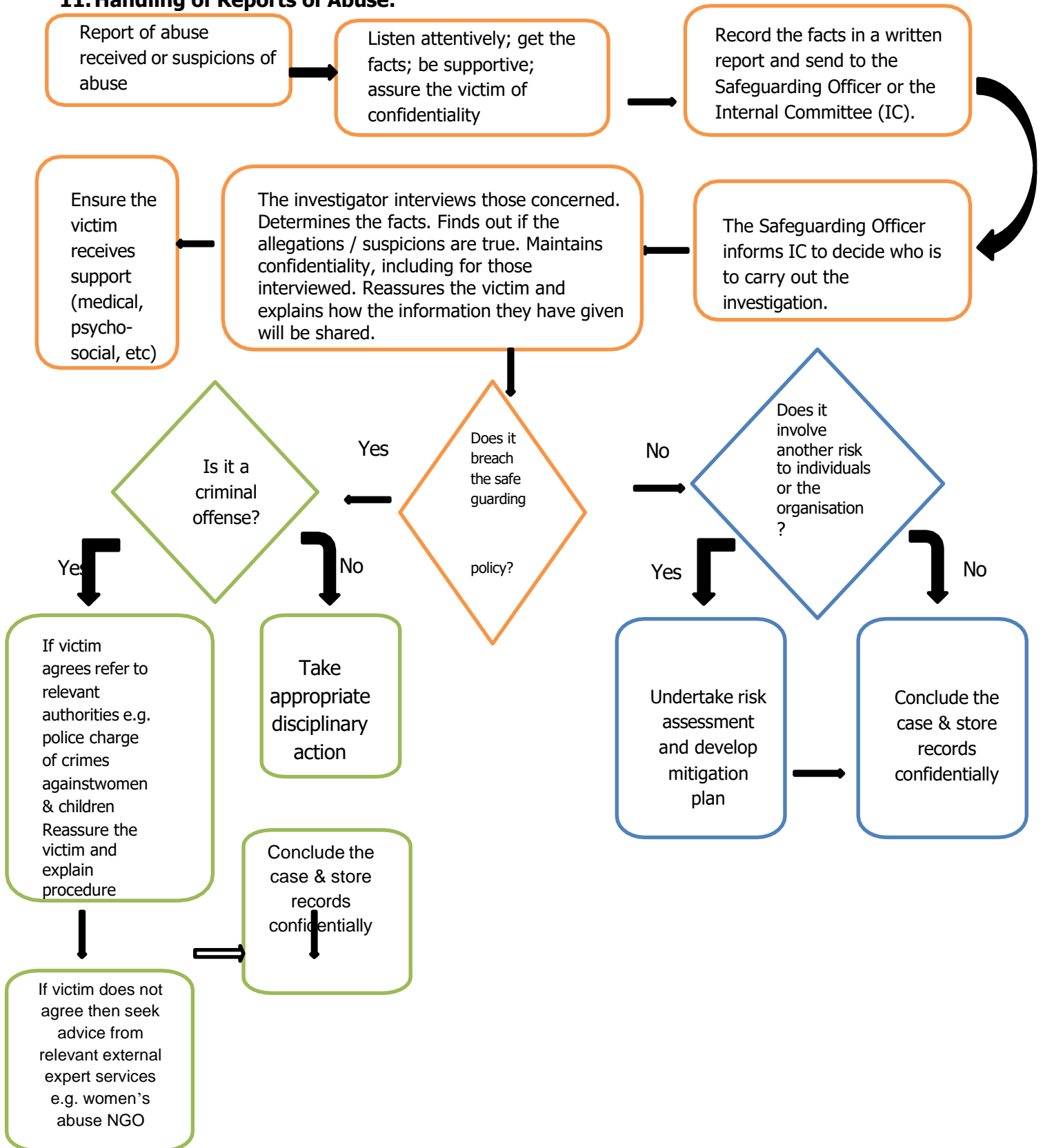
Authorized Signatory for Approval of plan



Monica Rita De' Souza, Trustee

Date: 10th January 2025

11. Handling of Reports of Abuse:



ANNEX 1 – Protsahan Safeguarding Code of Conduct

Protsahan's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all Protsahan Employees and Related Personnel. To this end, all Protsahan Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by Protsahan's policies.

This Safeguarding Code of Conduct is intended to provide an illustrative guide for Protsahan Employees and Related Personnel to make decisions that exemplify Protsahan's broader Code of Conduct and core values in their professional and personal lives. Any violation of this Safeguarding Code of Conduct is a serious concern and may result in disciplinary action, up to and including dismissal. All Protsahan Employees and Related Personnel must read and sign this Safeguarding Code of Conduct.

As a Protsahan Employee or Related Personnel, I will –

1. Treat every Person with empathy and respect, regardless of his/her race, colour, gender, sexuality, language, religion, religious belief, heritage, political/other opinion, national/ethnic/social origin or property/disability/birth/other status.
2. Create and maintain a safe and equitable organisational culture that prevents and opposes emotional abuse, physical abuse, sexual abuse and exploitation.
3. Listen to the others and respect their views.
4. Ensure that physical contact with a beneficiary or colleague is respectful, culturally appropriate and essential to the purpose of your interaction
5. Establish an atmosphere that fosters the development of Children through your actions and words.
6. Always take permission from Children and adults before taking their photos or videos. Ensure that photos and videos do not detract from dignity of the persons, and are an honest representation of the facts. Ensure that the file names do not reveal exact location of Children.
7. Keep all personal information about Children or their parents/guardians confidential and secure and ensure that such information is dispensed to only those individuals who are legitimately entitled to it.

8. Maintain appropriate boundaries while interacting with children and adults. Ensure that interaction with children should be in the presence of other adults or other children. If there is a legitimate cause to meet alone with a child, the office or room should have a glass door window, or a window, or the door should be left open.
9. Immediately report any concerns I have regarding possible violations of the Protsahan Safeguarding Code of Conduct, whether by an Protsahan Employee or by Related Personnel **to the Safeguarding Officer**. I understand that failure to report any concerns may lead to disciplinary action. I will ensure I am aware of the options available to me to report and that when I report a concern or allegation, I will do so confidentially. I understand that for respect, dignity and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I am aware that breach of this policy may put others at risk and will therefore result in disciplinary procedures.
10. To disclose to Protsahan any civil judgment or criminal conviction that relates to allegations made against me of emotional abuse, physical abuse, sexual abuse and exploitation.

As an Protsahan Employee or Related Personnel, I will not–

1. Use language or behavior towards others that is inappropriate, harassing, abusive, sexually provocative, demeaning, intimidating, offensive, discriminatory or culturally insensitive.
2. Ignore any child or adult or look down upon their ideas or suggestions.
3. Use any form of corporal punishment on children or adults, nor give any unwelcome physical contact to any person.
4. Develop, induce or support physical or sexual relationships with Children, in any way.
5. Place any Child at risk of harm or abuse and do not harm or abuse any person physically, emotionally, mentally, or sexually.
6. Share with or show Children or any adult (electronically or in any other form) inappropriate content including pornographic material or material encouraging

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crime, violence, terrorism, racism, sexism, self-harm, suicide, cruelty and gambling.

7. Share personal information about Children or their parents/guardians, without their consent
8. Use or encourage the use of alcohol, drugs, cigarettes or other intoxicating substances while interacting with Children and from providing such intoxicating substances to Children.
9. Develop any form of relationship or arrangement (financial or otherwise) with Children or adults which could in any way be deemed to be exploitative or abusive. Nor use Child labour in any form.
10. I will not not meet children in isolated locations without the presence of other adults or other children.
11. I will not – “keep a secret” that could hide illegal actions by any colleague or person covered by this policy. Nor delay or fail to identify persons who could be a risk to others.
12. I will not – close eyes to behavior that injures anyone around you.

Signed by Employee, Applicant, Volunteer as applicable

City_____

Date_____



Annex 2 - Incident Report

Date/Time of Incident:

Location of Incident / Activity:_____

Type of Incident:

- | | |
|-------------------------------|--|
| _____General policy violation | _____Adult-to-minor boundary violation |
| _____Verbal assault | _____Adult-to-minor sexual abuse |
| _____Physical assault | _____Minor-to-minor sexual activity |
| _____Bullying/Hazing | _____Other: |

Name/Role of Personnel Involved:

Name/Role of Witnesses:

Describe the Incident:

Describe the Response of Personnel:

Date of Notification (if applicable):

_____ Parents

_____ Safeguarding Officer (Provide copy of fully completed Incident Report)

_____ Law enforcement - case # _____

_____ Child protective services - case # _____

Submitted by (Name/Role): _____

Signature: _____ **Date:** _____

STAFF IN CHARGE OF ACTIVITY TO COMPLETE THE FOLLOWING:

Describe the Response/Corrective Action (for example, follow up with parents, notify law enforcement or child protective services, notify the Safeguarding Officer, review with person reporting the incident, interview additional staff, disciplinary action for the person involved, increase or revise monitoring and supervision of activity involved, review policies and training for any amendments needed, etc...)

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Submitted by (Print Name/Role): _____

Signature: _____ Date: _____