

PRAXIS INDIA'S
SAFEGUARDING POLICY FOR CHILDREN AND VULNERABLE ADULTS

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INTRODUCTION AND OBJECTIVES

BACKGROUND

Praxis – Institute for Participatory Practices (Praxis) is a knowledge organisation that plays a role in influencing equity- and governance-related policies through participation and ensuring the right of every individual to a life of dignity and choices. Its aim is facilitating participation towards democratisation of development processes and results that will pave the way for an equitable society without poverty. The employees as well as other representatives of the organisation come into contact with community members, including children and vulnerable adults, on a frequent basis due to the nature of our work. Protecting and promoting their rights and welfare is the ultimate responsibility of Praxis.

According to the National Crime Record Bureau (NCRB) data 32,608 cases were reported in 2017 while 39,827 cases were reported in 2018 under the Protection of Children from Sexual Offences Act (POCSO). The overall crimes against children were also reported to have increased six times in a decade over 2008-2018¹. If we look further into the figures of women and children belonging to socially marginalised communities as per the NCRB data it is reported that 15.73 per cent of the total 1,31,430 incidents of crime under the Scheduled Caste and Scheduled Tribe (Prevention of Atrocities) Act from 2017 to 2019 have been against women and children². These figures point to the fact that there are layers of vulnerabilities pushing the marginalized sections to further marginalization thus making it crucial to have policies and procedures in place ensuring and promoting their safety and welfare.

At Praxis, we strongly believe and promote the principle of “Doing no Harm”. Drawing from this principle our priority lies in protecting children and vulnerable adults and ensuring that they are not exposed to harm or abuse through their contact with the Praxis’s staff or any other person associated with the organisation, during or after the course of their participation in our projects and programmes. In case if any situation does arise, then to ensure that they have access to safe and impartial grievance redressal mechanisms.

We affirm our commitment of “Zero Tolerance” towards any form of harm or abuse. We fully acknowledge that as an organisation, we have a duty towards all our stakeholders, especially the most marginalised and vulnerable ones. We also acknowledge that the communities we work with are at a constant risk of facing harm, intentional or unintentional, through our direct or indirect interactions with them. At the root of every safeguarding issue is an imbalance of power – between the vulnerable people and members of the organisations. We firmly believe it is unacceptable to abuse power and positions of trust, and prioritise safety of all people we interact with.

With this belief, Praxis will take all possible steps to PREVENT harm, enable REPORTING of harm and RESPOND appropriately when harm does occur with complete transparency and accountability. Praxis will take all steps to ensure its safeguarding measures are integrated into all core organisational systems, processes and practices. The aim is that all of Praxis’s operations, thematic portfolios, programmes, projects, activities, influencing work and interventions are designed and delivered in a manner that does no harm to children or vulnerable adults.

In the past year since the pandemic, there has been a shift in the mode of engagement with communities, with major work being carried out through online platforms. It has become even more

¹ <https://www.ndtv.com/india-news/22-jump-in-cases-of-child-sexual-abuse-in-2018-says-report-2162716>

² <https://theprint.in/india/governance/crimes-against-sc-st-women-children-up-15-but-conviction-rate-low-says-house-panel/626548/>

important to relook at all the policies and procedures and adapt them according to the present context.

The Safeguarding Policy for Children and Vulnerable Adults (herewith referred to as Safeguarding Policy) aims to outline Praxis 's commitment to safeguarding and protecting children and vulnerable adults from any intentional or unintentional harm that may arise from our staff or associated members coming into contact with them through our programmes; to identify and minimise the risks; and outline the mechanisms and procedures in place to ensure a safe environment in created.

OBJECTIVES

The purpose of the Safeguarding Policy is to ensure that:

- All the employees as well as associated individuals (including consultants, volunteers, interns) are aware of their duty and responsibility to safeguard children and vulnerable adults from any form of abuse or harm.
- Mechanisms and procedures are laid out to prevent and deal with inappropriate behaviour of our staff members and associated individuals which harm or exploits children and vulnerable adults.
- Children and vulnerable adults who we work with are aware of the responsibilities of Praxis's staff to prevent and respond to any harm against them arising from actions and behaviours of our Staff or associated individuals, and the grievance redressal mechanisms available.

The policy provides procedures and tools for the dissemination, implementation, monitoring and reviewing processes towards safeguarding the welfare of children and vulnerable adults or adults at risk across all programmes of Praxis. It will be reviewed and revised every three years to embed and incorporate the organisation's emerging context and relevance.

PRAXIS'S SAFEGUARDING FRAMEWORK

SCOPE OF THE POLICY

The policy applies to all permanent employees, contractual employees, non-programme contractors, management team, partner organizations, interns, volunteers and any other persons contracted by Praxis or are associated with Praxis in any capacity and at any level, and in the course of their work/task may come in contact with children, young persons or adults.

GUIDING PRINCIPLES

The Safeguarding Policy will be guided by the following core principles:

Rights Based Approach: Right to safety and protection is a fundamental human right irrespective of a person's gender, age, disability, race, religion, caste, economic status, gender orientation, culture, illness, societal factors. Praxis considers it to be the preliminary guiding force. In all its programs and actions, the rights of children and vulnerable adults are promoted, ensured and demanded. The organisation strives to ensure that measures and systems are in place to protect them from any form of abuse or maltreatment by staff members, or by anyone affiliated to Praxis or who may be required to work as Praxis's representative.

The Best Interest of the Child and Vulnerable Adult: A community centered approach is the guiding force for the development and implementation of policies and programmes. They are designed to promote the best interest of the children and adults at risk, with their rights and overall wellbeing being given the ultimate priority in the organisation's functioning, crisis management and program implementation.

Transparency and Confidentiality: Praxis promotes an environment of openness within the organisation and with external stakeholders. The layers of management are not allowed to be barriers in communication: all staff and stakeholders are encouraged to share their concerns and learn about the organisation's procedures at all times in a way that it also does not compromise the need for confidentiality of the child or adult at risk or a related case of their safety or protection concern.

Non-Discrimination: Everyone is entitled to all the rights and freedoms without distinction of any kind, such as caste, class, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, medical condition or other status.

Shared responsibility: All Praxis partners and contractors' staff and associates must commit to and uphold the principles and practices of the Policy, in order for it to be meaningful and successful.

Accountability: Praxis has systems in place to document, monitor and report on the implementation of the safeguarding Policy, as well as mechanisms to ensure that management and staff are committed to, and are undertaking their safeguarding roles and responsibilities to the best of their capacity.

KEY DEFINITIONS

1. A **Child** is any person who has not attained the age of 18 years, as defined in the United Nations Convention on the Rights of the Child and the Juvenile Justice (Care and Protection of Children) Act, 2015 of India.
2. **Abuse**, includes all forms of physical and emotional ill-treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the person's health, development or dignity (WHO). Within this broad definition, five subtypes can be distinguished – physical abuse; sexual abuse; neglect and negligent treatment; emotional abuse; and exploitation
 - a. **Physical abuse** is the actual or likely physical injury to anyone or a failure to prevent physical injury or suffering.
 - b. **Sexual abuse** is the actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.
 - c. **Sexual exploitation** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, sexually or politically from the sexual exploitation of another.
 - d. **Neglect** is the persistent or severe neglect of a person or the failure to protect a person from exposure to any kind of danger, failure to carry out important aspects of care resulting in the impairment of the child's health or development.
 - e. **Emotional abuse** the actual or likely severe adverse effect on the emotional and behavioural development of a program participant caused by persistent or severe emotional ill-treatment or rejection. All abuses involve emotional ill-treatment.
3. **Safeguarding** refers to the responsibility of agencies working with/in contact with/impacting children and/or adults, to take all reasonable measures to ensure that the risks of abuse are minimized; and where there are concerns about their welfare, to take appropriate actions to address those concerns (i.e. working to agreed policies and procedures, and in accordance with local laws).

4. **Vulnerable adults or adults at risk** refers to individuals who have completed 18 years or above 18 years and are subjected to vulnerability due to multiple factors such as age, disability, gender, race, religion, caste, economic status, illness including other societal factors leading to power imbalance.

ROLES AND RESPONSIBILITIES

Each person associated with Praxis has the responsibility to create an environment that is safe for all the children and vulnerable adults that we interact with. Some specific roles and responsibilities of the different categories of people Praxis engages are given below:

Praxis's **Board of Directors** have the overall responsibility of determining the Safeguarding Policy and its implementation.

The **Senior Management Team** is responsible for the validation of the policy and its strategic/operational development by monitoring the implementation of the annual work plan. They have direct responsibility to ensure that all individuals who are associated with the organisation (permanent employees, contractual staffs), irrespective of their designations and roles, should receive awareness training about the policy and its accompanying systems and procedures.

The **Programme Managers** are responsible for ensuring that the programme offices and partner organisations have a safeguarding policy in place and a focal point person to look into the complaints. They must extend required support to these point persons to carry out their role. They must also ensure that any persons that are hired on a contractual basis for any duration of time are made aware of Praxis's safeguarding policy.

All **Employees and Consultants** should be aware of their responsibilities and duty of care to ensure abuse is prevented. In addition, they should also be aware of their predetermined role in ensuring the safety of children and adults at risk as well as their responsibility for mandatory reporting where instances of abuse may occur.

Partners: By working with partners in many states across India, Praxis is challenged on one hand in empowering the partners and the communities, while at the same time ensuring its own organizational responsibility and commitment towards children and adults in contact with Praxis's programmes, within or outside its immediate control in the project. Praxis will engage with partners who have an existing safeguarding policy and have the willingness to strengthen and implement the policy in line with Praxis's vision of safeguarding. For partners who do not have a safeguarding policy, while we will encourage them to create one, Praxis's safeguarding policy will apply until the time they have their own.

Volunteers and Interns: The volunteers and interns of Praxis provide a wide range of services and contribute to the dynamic element of its work. Under this policy all volunteers and interns have a responsibility to report any concerns of abuse, and likewise they are obliged to adhere to the safeguarding policy and its procedures.

Visitors: Visits to projects and communities are opportunities to see the development work first-hand. However, this may pose risks towards the children/adults Praxis is working with. Thus, measures of safeguarding are needed to be in place to keep them safe but at the same time facilitate visits to projects, partners and activities for a variety of reasons. It is essential that all visitors are aware of and understand the principles of Praxis's Safeguarding Policy. It is the responsibility of senior management to ensure that they are briefed accordingly. Under this policy all visitors have a responsibility to report

any concerns of abuse, and likewise they are obliged to adhere to the safeguarding policy and its procedures.

The Focal Point Person (FPP) from Praxis is responsible for the day-to-day operation of the Safeguarding Procedures in accordance with the policy. This includes the dissemination of information on safeguarding in languages, formats and media that are easily understood, respectful and culturally appropriate for the community, identifying training needs of staff and other people associated with Praxis, and communicating roles and responsibilities of all staff members and others. S/he along with the concerned project manager and a senior management staff shall support partners to develop and have strong, accessible mechanisms in place.

Where concerns of abuse arise, the FPP, in consultation with the senior management team, will have the responsibility to ensure that mandatory internal reporting is put into effect to protect the child/adults at risk, ensuring confidentiality of the complaints. They must also decide on the correct course of action, based on this policy and its accompanying procedures on how best to deal with the case. In all cases the principle of “best interest of the child/vulnerable adults” shall be considered above anything else.

The FPP is also responsible for reviewing complaints - number of complaints received, number of complaints addressed, number of complaints pending, nature of complaints, etc; reviewing the policy periodically to meet the legal as well as other mandates, from time to time mapping out the relevant regulations, laws, mechanisms and authorities/bodies; and to identify any gaps in the policy and updating it from time to time.

Where concerns of abuse arise, Praxis will consider its legal obligations to report those concerns to relevant, competent authorities and take action against the individual, groups or organisation. In case of an incident of abuse, where the partner does not have a Safeguarding Policy or the existing policy does not clearly outline the response mechanism, the Safeguarding Policy of Praxis shall prevail.

It should be understood that the Focal Point Persons are not solely responsible for safeguarding - the responsibility rests with everyone.

RISK ASSESSMENT

Praxis recognizes that it is involved in a range of activities, and each activity is associated with a range of risks it may put children and vulnerable people at. It is very important to understand where, when and how we engage with these communities and what risks this presents.

The following table is an attempt to identify these risks and prepare a plan of action in a manner that minimizes them.

| Activity | Stakeholders at risk | Potentials risks to children and vulnerable adults |
|---|---|--|
| OFFLINE ACTIVITES | | |
| Primary Research (traditional and participatory methods) | People who are subjected to vulnerabilities due to multiple factors such as age, disability, gender, race, religion, tribes, caste, economic status, illness, geographical location, occupation, including other societal factors leading to power imbalance. | <ul style="list-style-type: none"> • Physical abuse • Verbal abuse • Emotional and mental abuse • Sexual abuse and exploitation • Sexual Harassment • Neglect • Discrimination (on the basis of gender, caste, economic status, etc) • Breach of data privacy, misuse of personal information • Contacting beyond scope of work • Safety issues related to travel, location and timing of programme • Health and sanitation |
| Events (round tables, GLPs, consultations, conferences, seminars, dissemination programmes) | | |
| On-ground Implementation work (trainings, relief work, research and advocacy) | | |
| ONLINE ACTIVITIES | | |
| Secondary Research (reviewing documents available in public domain, policy analysis) | People who are subjected to vulnerabilities due to multiple factors such as age, disability, gender, race, religion, tribes, caste, economic status, illness, geographical location, occupation, including other societal factors leading to power imbalance. | <ul style="list-style-type: none"> • Verbal abuse • Emotional and mental abuse • Sexual abuse and exploitation • Sexual harassment • Neglect • Discrimination (on the basis of gender, caste, economic status, etc) • Breach of data privacy, misuse of personal information and records • Increased risk of miscommunication and misunderstanding of messaging • Contacting beyond scope of work |

Praxis will ensure that activities on the organisation involving participation directly or indirectly of children or vulnerable adults through any medium (in person, virtual, audio-visual) are preceded by a thorough risk assessment at the organisational to ensure that any possibilities of risks are minimized. The above list of risks is not exhaustive. Staff, Associates, and Visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of children and vulnerable adults.

PRAXIS'S AFFIRMATIVE ACTIONS TOWARDS SAFEGUARDING

STAFF RECRUITMENT AND SELECTION

The safe recruitment process includes a set of actions that together reduce the chances of employing an unsuitable person. The selection process must follow the following steps to ensure safer recruitment. Not being able to comply with one aspect of the checklist does not mean that the appointment cannot proceed. An overall assessment of the information available needs to be made.

Advertisements for jobs

Advertisements should clearly state that a Safeguarding Policy exists and that a screening process is in place. The following wording can be used:

“This post involves regular contact with children and/or vulnerable adults and Praxis India operates rigorous recruitment and selection procedures and checks that reflect its commitment to the protection of children and vulnerable adults from abuse.”

Interview

A. When a job applicant is invited for interview, the invitation letter will refer to the special recruitment procedures relevant to safeguarding issues:

‘Praxis India has a responsibility to ensure that children and vulnerable adults are protected and kept safe from harm while they are in contact with our staff. This post involves regular contact with children and adults and the recruitment processes will include specific checks related to safeguarding issues, which will be implemented for all candidates shortlisted for this post.

B. During interview of applicants to posts, the following needs to be ensured:

- Ideally the interview panel should include a person with experience of working with children vulnerable adults and knowledge of protection issues.
- Interviews with applicants should include specific questions at the first stage on protection and safeguarding issues to probe their attitude, experience and approach to working with children and/or vulnerable adults relevant to the post applied for.
- Where a candidate who is considered appointable (regular or on contract) has disclosed a criminal conviction during interview, there should be a follow up interview to deal with specific questions to obtain information about the background and circumstances. Where an applicant is known to have been subject to a disciplinary process with a previous employer, the circumstances should be explored with him/her and the previous employer.
- Candidates should not be rejected solely on the basis of a criminal conviction or disciplinary record, without examination of the circumstances being formally recorded.

Reference check and eligibility

Post the shortlisting and before selection, the following processes need to be ensured:

- At least two employment references should be taken up on applicants where relevant before appointment to post. These should be from the last two employers and include (where possible) an employer who can comment on the applicant’s work with children and/or vulnerable adults.
- It is essential to verify the qualifications required for the post to help detection of false employment histories or backgrounds. Originals of qualification certificates should be viewed by Praxis staff, copied and kept on file.

Proof of identification

Individuals will be required to produce proof of identity at final interview. This must include photo ID, and two documents of proof of place of residence. If the documents do not exist, the reasons for the same needs to be identified. The Administration, in that case, should personally talk to people known to the applicant and get a written character antecedent certificate, along with their identity card numbers.

Gaining information on past conviction

The job applicant will require to self-certify that there has never been any criminal case against them, especially with respect to abuse. If there are any, they’ll have to provide the details of the case and conviction. (Refer to Annexure III).

Self-Declaration

Once selected, all employees and consultants must sign the Code of Conduct of Safeguarding of Children and Vulnerable Adults (provided in Annexure I & II) and confirm that they have understood the principle, purpose, and intent of the safeguarding policy and will adhere to the code of conduct and that they will be subjected to disciplinary actions if they fail to uphold the same.

CREATING ORGANISATIONAL CULTURE AND SYSTEMS

Senior Management Team has a responsibility to assess the local management culture and systems to ensure an enabling environment exists for the effective implementation of the Safeguarding Policy. Employees and others must feel that a positive and supportive environment exists to be confident in raising and reporting any concern, often the most challenging step to take. The management culture must also reflect awareness of the issues of child safety concerns as well as risks of abuse to adults, by challenging bad practices and adopting a risk mitigation approach.

Management culture

An open and aware culture is vital in establishing a safe environment and is demonstrated by:

- Listening and responding to concerns raised by employees and others including children
- Regular opportunities for informal discussions in head office as well as project offices
- Observing signs of anxiety and stress in employees
- Regularly discussing on sensitive matters to create an open and comfortable environment
- Giving and receiving critical feedback
- Encouraging clear and open communication
- In situations when concerns are raised taking actions keeping in mind the best interest of the complainants

Systems

Recruitment, induction, supervision, meetings and debriefing are examples of the systems whereby senior management have a responsibility to ensure safeguarding issues are mainstreamed and fully integrated. These responsibilities can be summarized as follows:

- A minimum requirement of awareness raising and dissemination of information on the Safeguarding Policy and specific local procedures should be incorporated into induction training for all new employees. Refresher training should also be periodically (preferably on an annual basis) organised for the existing employees, along with specialised trainings for employees, consultants, volunteers and interns will be conducted on a needs basis.
- For all employees, regular supervision and support meetings should be promoted as a safe platform for sharing of information, experiences and challenges related to safeguarding and protection. This will provide opportunities to discuss concerns within teams or with colleagues will help develop an open and aware culture and raise issues at an early stage.

RESPONDING TO A DISCLOSURE

If you have received information from an individual who is concerned about possible abuse of a child or vulnerable adult, you should respond in the manner described below. This is especially crucial if it is a child that is divulging personal information to you.

- Listen and allow the child, vulnerable adult or other individual to explain the situation in his or her own words.
- Reassure the individual that they have not done anything wrong.
- Maintain a positive and supportive attitude.
- Provide the individual with information on what is likely to happen next.

- Do not promise confidentiality, instead inform the individual that you will need to tell someone who can help. You must not promise a child or vulnerable adult or another individual who has provided you with information about abuse that you will keep the information secret. Rather, you must discuss the Safeguarding Policy process and safeguards with the individual and listen to the individual's concerns. You should only reveal the concern or report of abuse to the appropriate person as described in the reporting process outlined in the next section. The disclosure should otherwise be treated as strictly confidential. This is a vital component of the process.
- If it is a child, do not ask direct or detailed questions at this time. It may be a very traumatising time, especially for a child.

The process for recording concerns or cases of potential program participant abuse for Praxis's staff, is:

1. Write down in detail what you observed and any related conversations that you have had.
2. Report the case to the Safeguarding Focal Point within 24 hours. If you are not the person that had the initial suspicion, but rather, someone confided in you, you are still required to report the concern to Praxis.
3. Avoiding any delay, the Safeguarding Focal Point Person should immediately inform the Programme Lead and Member of Senior Management Team.
4. The Safeguarding Focal Point Person will maintain full records of these conversations. Information will only be passed to those people who need to be aware of the case as described in this procedure. Extreme vigilance must be exercised in protecting confidential information.
5. Praxis will follow up safeguarding reports and concerns according to policy and procedures, and legal and statutory obligations, including recommending if any onward referrals need to be made.

All Praxis staff, and associated individuals have a duty and right to report suspected or witnessed incidents of abuse. It is the responsibility of all associated individuals of the Praxis to raise any safeguarding concerns. You do not have to decide whether abuse, harassment or exploitation has occurred. Failing to report concerns can result in disciplinary action or breach of contract.

REPORTING

Anyone can raise a concern to Praxis about an incident they have experienced, witnessed or have had disclosed to them. This can be done verbally or in a written form to the designated Safeguarding Focal Point Person, or other person they feel comfortable sharing with.

1. Procedure for the Praxis staff and associated individuals:

All Praxis staff, and associated individuals should report safeguarding concerns (suspected or actual) to the Safeguarding Focal Point Person. Alternatively, they can report to their line manager, who should inform the Focal Point Person and escalate to the programme lead or senior management staff.

2. Procedure for the Praxis's Partners:

In the first instance, partners should follow safeguarding reporting mechanisms as outlined in their individual policies, however, should the concern be in relation to a Praxis program, partners should immediately report any credible suspicion of, or actual incidents of abuse and exploitation to either Praxis's Safeguarding Focal Point, or the programme lead or a senior management staff.

Partners are expected to investigate these concerns and take follow-up action. Praxis will support them if any advice or guidance is needed in order to investigate and address any concerns adequately. Praxis will follow up progress of the investigations, safeguarding reports and concerns according to the policy, procedure and legal and statutory obligations.

Confidentiality shall be maintained at all stages of the process when dealing with safeguarding concerns. All information, including the name and other details of the complainant and the nature of complaint will be shared only with the appropriate person(s) as described in the reporting process. All information related to safeguarding, whether physical or electronic copy, will be kept private and secure. The records will be kept only with the FPP, and any disclosure/leakage of information will lead to strict disciplinary action.

Where concerns of abuse arise in relation to Praxis's programme, the organization will consider its legal obligations to report those concerns to relevant, competent authorities and take action against the individual, groups or organisation. In case of an incident of abuse, where the partner does not have a Safeguarding Policy or the existing policy does not clearly outline the response mechanism, the Safeguarding Policy of Praxis shall prevail.

The reporting flowchart has been detailed in Annexure IV.

DISCIPLINARY ACTION

If it is determined by Praxis that a staff member or any associated individual has breached the Safeguarding Policy, disciplinary action will be taken. In making a decision about whether and what form to take disciplinary action, the following factors must be considered:

- The nature of the policy breach;
- The intent of the individual charged;
- The context and nature of the abuse;
- The harm to the child or vulnerable adult;
- Other factors as deemed relevant.

Disciplinary action may result in termination of the relationship between Praxis and the individual whether through formal dismissal, termination of contract or otherwise. Praxis may also determine that the case is such that criminal prosecution should be sought against the individual and the appropriate external authorities will be informed.

Also, If the report is found to be fake, which leads to misrepresentation of the organization or an individual associated with the organization, appropriate disciplinary action will also be taken against them.

If the complaint is related to sexual exploitation or abuse, then the investigation process will be as per the provisions of Praxis's Anti-Sexual Harassment Policy.

DETAILS OF FOCAL POINT PERSON FOR THE SAFEGUARDING POLICY AT PRAXIS:

Vijeta Laxmi
Programme Manager

Contact Number: +91 7545939343
Email id: vijetal@praxisindia.org

ANNEXURE I: CODE OF CONDUCT GOVERNING SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS

Praxis is committed to creating a safe environment for children and vulnerable adults. As part of our efforts to ensure safety of community members, it is required that all staffs, consultants, interns, volunteers and contractors abide by the Safeguarding Policy and follow the Code of Conduct. Everyone collectively has the duty to uphold the principles of the Safeguarding Policy for Children and Vulnerable Adults from any intended or unintended harm. They must commit to create and maintain an environment that is secure and avoid any behaviour or conduct that compromises the protection of children or vulnerable adults. As a representative of Praxis, employees and associated individuals must commit to abiding by this Code of Conduct. Any breach of the Code of Conduct must be reported by the person, who witnesses the same or is informed about.

When an employee engages in conduct in violation of the Safeguarding Policy off-duty and not on Praxis property, Praxis may discipline the employee, up to and including discharge, as per the factors detailed out in the “Disciplinary Action” section of the Safeguarding Policy. Conduct that is off-duty but on Praxis property is always connected to employment at the Praxis. Likewise, conduct that is on duty but off Praxis property is always connected to employment at the Praxis.

I WILL ALWAYS:

1. Adhere to the Safeguarding Policy for Children and Vulnerable Adults and follow all procedures in place.
2. Treat children and vulnerable adults in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
3. Be mindful of potential risks of any activity within a programme.
4. Create and maintain a safe and secure environment, so as to minimize the risk of harm, abuse and exploitation of children and vulnerable adults through words or actions.
5. Organise and plan workplace spaces and activities to minimise risks of harm, abuse and exploitation of children and vulnerable adults.
6. Seek consent of parents/guardians or community in the case of children, before engaging with them and explain to them the purpose of the process.
7. Inform children and vulnerable adults about their safeguarding rights and how to raise a concern.
8. Ensure whenever possible that another adult is present when working in the proximity of children.
9. Maintain high standards of personal and professional conduct and set a good example for others.
10. Promote an organisational culture and support in developing systems in which abuses do not go unchallenged and complicity in violation of these codes is condemned.
11. Respect the privacy and confidentiality of children and vulnerable adults. To ensure this, I will:
 - Never ask for or accept personal contact details or invitations to share personal contact details (such as email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child or their family or any other adult with whom I come in contact with for work.
 - Never share my own personal contact details with such individuals except where this has been explicitly authorised by the organization.
 - Never disclose, or support disclosure of, information pertaining to any community member who have been part of any programme activity. In case the disclosure is in

accordance with project requirement (for example for publishing on social media), Free, Prior and Informed Consent must be sought from the community member.

12. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or vulnerable adult in accordance with applicable procedures.
13. Take seriously any concerns raised about abuse, support any individual who raises such a concern, and comply fully with investigations of abuse.
14. Ensure the protection of program participants who may be the subject of this abuse and seriously take into account the needs and wishes of the survivor of abuse.

I WILL NOT:

1. Abuse my position of power over any other employee, associated individuals or community member.
2. Abuse or exploit a child or vulnerable adult or behave in any way that places a child or young person at risk of harm.
3. Use language or behaviour that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Discriminate against, show differential or preferential to, or favour particular children and young people to the detriment of them or others.
5. Use physical punishment/discipline or use of physical force of any kind towards children and vulnerable adults.
6. Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.
7. Engage children or vulnerable adults in any form of sexual activity which involves the exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
8. Use inappropriate questions, attitudes or comments that put them in uncomfortable or unwelcomed situation or could be traumatic.
9. Fondle, hold, kiss, hug or touch children or vulnerable adults in an inappropriate or culturally insensitive way.
10. Force them to divulge details if they are not comfortable or not showing interest to talk further.
11. Sleep in the same room or bed as a child or vulnerable adult with whom I am in contact in a work related context. Where it is necessary to sleep close to unaccompanied children and vulnerable adults, I will make sure that another adult is present and it is in line with authorised procedures.
12. Spend time alone away from others with children and young people with whom I am in contact in a work related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.
13. Reveal identifying information while sending images electronically or publishing images or stories in any form, which may endanger them, their family or community.

-----DECLARATION-----

I acknowledge that I have read and understood Praxis's Policy on Safeguarding Children and Adults at Risk, and agree that in the course of my association with Praxis, I will adhere to its Code of Conduct and maintain all work ethics. I understand that the onus is on me to use common sense and avoid actions or behaviours that could be construed as exploitation and abuse, any failure to uphold the code of conduct may attract disciplinary actions.

Name: _____

Date: _____

Signature: _____

ANNEXURE II: CODE OF CONDUCT WHILE USING MEDIA AND HANDLING COMMUNICATIONS

THE USE OF SOUNDS, IMAGES AND PROGRAM PARTICIPANT-RELATED DATA.

As outlined in the Code of Conduct, Praxis has clear guidelines for safeguarding program participants in our media and communications. The best interests of program participants are prioritised over opportunities for increased funding, positive public profile and advocacy. When recording, photographing, or filming a program participant for work-related purposes or using data, staff and associated persons should adhere to the following codes of practice.

With respect to use of pictures and video of children and vulnerable adults, I will:

1. Undertake informed consent procedures to ensure that our contributors fully understand the implications and outcomes of their contribution and are enabled freely to give (or withhold) their consent.
2. Before recording, photographing or filming a program participant, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
3. Obtain written consent before recording, photographing or filming a program participant and inform them about the specific purpose(s) and intended use. In the case of a child, a parent or guardian, to use images and stories for publicity. Prior to use of images or stories, ensure that there would be no repercussions when the individual is featured publicly.
4. Ensure recordings, photographs, films, videos and DVDs present children and vulnerable adults in a dignified and respectful manner and not in a vulnerable or submissive manner, that impact negatively on their dignity and privacy.
5. Ensure recording and images are honest representations of the context and the facts.
6. Ensure that the use of the images, including file labels, does not put the child or young person at risk of being identified or located.
7. Ensure data and images are securely stored.
8. Respect a program participant's decision to refuse to be interviewed or photographed, making it clear that there will be absolutely no negative repercussions from denying such consent.
9. Not click or publish negative, degrading or stigmatising images of participants, avoiding perpetuating negative stereotypes.
10. Adhere to the 'do no harm' principle when gathering and using images and stories and sharing data. Fully assessing and responding to, the risks to contributors.

SOCIAL MEDIA

Praxis's social media accounts

1. Use only social media platforms sanctioned by Praxis and refrain from private use of program participant images or posting them on personal social media.

2. Always ensure that informed written consent was obtained before publishing any photos, videos or personal information.
3. Consent is given to 'Praxis' as an organisation and not to the individual for personal use.
4. Usage of the Praxis's official social media channels are restricted to the Communications team, or any other designated member.

Personal social media accounts

1. Keep your personal and professional life separate, including on social media. In your role as a representative, avoid befriending a program participant on your personal social media platforms.
2. Never directly post images or stories about people engaging with Praxis on your personal social media accounts.
3. If you wish to promote the work of Praxis, associated individuals are encouraged to share information that has been posted on the Freedom Fund website or social media platforms by re-sharing/re-tweeting information on their personal social media accounts.
4. Always think twice about what you post/share and what implications this may have for the organisation.
5. Never upload or post any racist, defamatory, obscene, or abusive content.
6. Inform the Safeguarding Focal Point Person if you observe or read content Praxis associated individuals which breaches these guidelines and the Safeguarding Policy.

2.2 Partners' use of social media:

1. Where a partner organisation has posted images or stories about program participants that make them identifiable and may put them at risk, discuss this with the partner organisation as soon as possible and agree a way forward that prioritises the safety of children and vulnerable adults.
2. Always inform the Safeguarding Focal Point Person if you observe or read content from Praxis's partners (especially in relation to supported programs) which breaches this code or Safeguarding Policy.

----DECLARATION----

I have read the Safeguarding Policy and Code of Conduct in Using Media and Communications, and agree to abide by it at all times to protect the children and vulnerable adults I may come into contact with through my work for and/or association with the Freedom Fund.

Name: _____

Date: _____

Signature: _____

ANNEXURE III: DECLARATION OF CONVICTION FORM FOR NEW RECRUITS

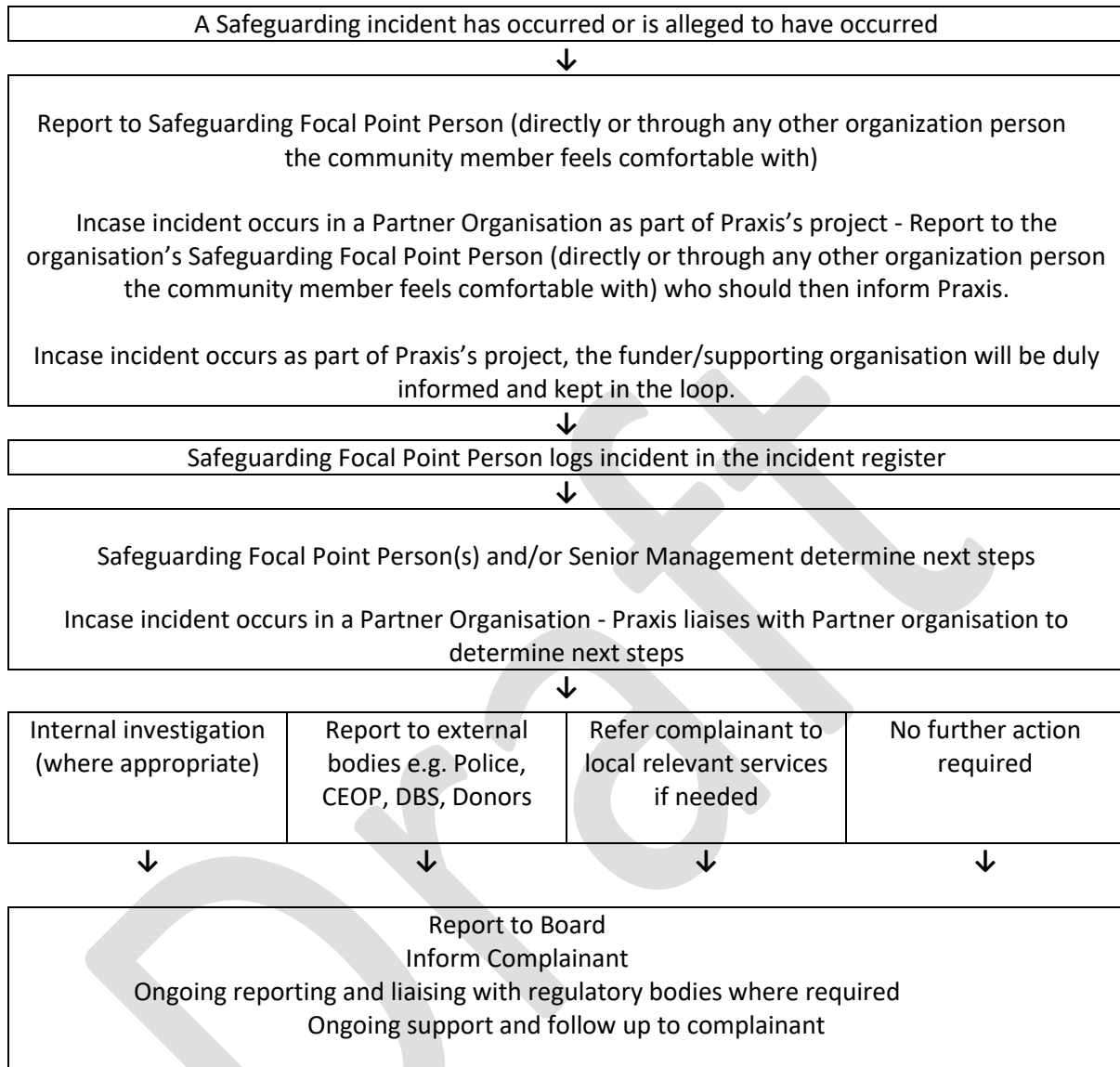
| |
|---|
| 1. Declaration of convictions |
| Do you have any criminal convictions, spent or unspent? Yes () No () |
| If 'yes' , please give the date and details of the conviction(s) you were charged with, the sentence you received, and how you dealt with the sentence (e.g. paid the fine). |
| Please give full details of the reasons and circumstances that led to each of the above. |

DECLARATION: I certify that all information contained in this form is true and correct to the best of my knowledge and I realize that false information may lead to the termination of the Recruitment Process or my dismissal.

Signature: _____

Date: _____

ANNEXURE IV: REPORTING FLOWCHART



ANNEXURE V: OTHERS POLICIES OF PRAXIS

1. Anti-Sexual Harassment Policy
2. Equal Opportunity Policy
3. Gender Policy
4. Whistle-Blowing Policy
5. Rules of Conduct