

<b>Title</b>	<b>SAFEGUARDING POLICY- Protection from Sexual Harassment, Exploitation and Abuse, and Child Abuse (PSHEA)</b>  <b>Policy 1:</b> Prevention, Prohibition & Redressal of sexual harassment of women at workplace (PoSH)  <b>Policy 2:</b> Prevention of Workplace harassment - Exploitation & Abuse  <b>Policy 3:</b> Child Safeguarding Policy (CSP) – Preventing Child Abuse		
<b>ORIGINATING DEPARTMENT</b>	HUMAN RESOURCES & OD	<b>POLICY OWNERSHIP</b>	Sr. Director-HR & OD
<b>APPROVED BY</b>	Manoj Gopalakrishna, CEO	<b>REVIEWED BY</b>	HR Policy Task Force, CISSD. Legal Advisor & CI team
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## “Our Core Values”



**Respect: Upholding the dignity of each individual**



**Integrity: Adhering to an ethical code of conduct in all actions**



**Commitment: Fulfilling our duties and social responsibilities**



**Excellence: Setting high performance standards and being accountable to them**

## **SAFEGUARDING POLICY- Protection from Sexual Harassment, Exploitation and Abuse, and Child Abuse (PSHEA)**

### **PURPOSE**

CARE India Solutions for Sustainable Development (referred to as CISSD) acknowledges its duty to protect and promote the welfare of employees and any person it comes into contact through its work. This includes, but is not limited to, staff, partners, programme participants, community members and all related personnel. The organisation recognises that unequal power dynamics in relationships, particularly gender inequality, can lead to increased vulnerability. CISSD commits to creating a positive safeguarding environment where potential risks are identified, considered, managed, and minimised with clearly defined processes and procedures for mitigation and redress.

This Policy lays out the commitments made by CISSD, and informs employees, consultants, vendors, associates, donors, contractors, partner organisations, institutions, and related personnel of their responsibilities, in relation to safeguarding.

### **SAFEGUARDING POLICY STATEMENT**

CISSD places human dignity at the centre of its relief and development work. At the heart of CARE's efforts to impact poverty and social justice is its engagement with marginalised communities. In CARE, we also recognise the responsibility we have to similarly promote human dignity and social justice within our own organisation and maintain a safe and respectful workplace. We recognise the importance of organisational culture and accountability in creating a safe and supportive organisation for our staff, our partners, and the communities with whom we engage with.

At CISSD, we believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, and that no child should be subjected to abuse of any form. We believe that sexual harassment, exploitation, and abuse, as well as child abuse, are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities, particularly those experienced by women, vulnerable adults and children. We recognise that there is unequal power between CISSD Employees and Related Personnel and the people we partner and work with throughout our programs, and also between people within our organisation. We expect that our power will not be used to advantage ourselves or cause harm to others.

CARE recognises we have a responsibility to protect people we work with, and who work for us, and we will continuously strive to prevent sexual harassment, exploitation and abuse and child abuse from happening. We take seriously all reports of sexual harassment, exploitation and abuse, and child abuse. Our actions are informed by a survivor-centred approach which means that the needs and wishes of survivors guide our response, that survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritised.

CISSD has a zero-tolerance towards sexual harassment, exploitation and abuse, and child abuse. We will carefully examine allegations and investigate, and take appropriate disciplinary action where this is needed,

taking into consideration the rights and interests of the survivor, consistent with CARE's survivor-centred approach. We make very clear that sexual harassment, exploitation and abuse, and child abuse in any form, perpetrated by our employees, partners or other related personnel, towards anyone, will not be tolerated. CISSD will not tolerate any form of harm and will take all reasonable steps to safeguard any person linked to the delivery of its work, either by its employees, associated personnel, contractors, consultants, or by any partner organisation or institution, from any form of sexual exploitation, abuse and harassment.

**This includes harm arising from:**

- The conduct of CISSD Employees, Board members, Associates, Consultants, Interns, Volunteers, Partners and Related Personnel<sup>1</sup>
- Any work or programme activities carried out by CISSD.

**What is SAFEGUARDING?**

Safeguarding means the measures we take to prevent, report, and respond to harm or abuse including sexual exploitation and abuse, as well as harassment, and to protect the health, well-being and human rights of anyone who comes into contact with CISSD. This policy aims to ensure that all employees, Board members, associates, consultants, interns, volunteers, partners, stakeholders, children, and visitors are safe from harm and abuse, harassment, as well as bullying.

**APPLICABILITY & ACCOUNTABILITY**

The Safeguarding Policy applies to all CISSD employees, Consultants, Volunteers, Interns, Board or a third party interacting with staff or related personnel of CISSD and Partners who are also expected to comply with all its requirements. Any violation of these requirements will result in disciplinary action and/or legal action in accordance with the applicable laws.

The policy applies both during, and outside, normal work hours. Actions taken by CISSD employees and related personnel outside of working hours that are seen to contradict this policy will also constitute a violation of this policy.

CISSD has a zero-tolerance approach towards sexual harassment, exploitation and abuse, and child abuse. CISSD will carefully examine allegations and investigate, and take appropriate disciplinary action where needed, taking into consideration the rights and interests of the survivor, consistent with CARE's survivor-centered approach.

CISSD management will take appropriate remedial measures, following investigation, including implementing measures to mitigate the potential for repetition, and to discipline any of its employees who have been found to have breached the Safeguarding policy, or those who may have to report their concerns about the inappropriate conduct they had actual knowledge of such conduct and the authority to do so.

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<sup>1</sup> Related Personnel includes board members, volunteers, interns and visitors and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-CISSD entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with CISSD, as well as community volunteers and incentive workers.

CISSD takes all concerns and complaints seriously and will act in strict confidence. CISSD will take all reasonable measures to ensure that confidentiality will never be compromised and will initiate a comprehensive investigation of all complaints that are in violation of this policy, taking disciplinary and legal action as warranted. CISSD's actions will be informed by a survivor-centered approach, which means that the needs and wishes of survivors guide the response, that survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritised,

### **CARE SAFEGUARDING COMMITMENTS**

#### a. Organisational Culture, Leadership and Accountability-

- i. **CARE will make every effort to promote, create and maintain a safe organisational** culture for all people who work for and with CISSD. This includes our partners and the communities where CISSD operates. At all times, it is expected that CISSD's leaders will promote CARE's safeguarding values by highlighting the organization's commitment to equality, diversity, and respect for others. CISSD will create an environment where it is safe to address sexual harassment, exploitation/abuse, and child abuse
- ii. **CARE will develop organization-specific safeguarding strategies**, with appropriate levels of dedicated capacity and allocated resources at all levels of the organization, to prevent and respond to sexual harassment, exploitation and abuse, and child abuse.
- iii. **CARE will ensure high-level oversight and accountability** around its safeguarding efforts. We will do this through monitoring and reviewing our safeguarding performance and seeking feedback from CARE Employees and Related Personnel, partners, program participants and communities where CARE operates, on the effectiveness of our safeguarding measures. We are committed to continuous learning and improvement to prevent and respond to sexual harassment, exploitation and abuse, and child abuse. We will be accountable and transparent in communicating our efforts and progress to various internal and external audiences, including CARE governance and leadership structures, staff, donors, partners, the wider sector, and communities. All information shared will be informed by a survivor-centred approach and risk assessment.

#### b. People Management-

- i. **CARE will seek to employ individuals who are aligned with our vision, mission, and values, and, in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation and abuse and child abuse from being (re)hired or (re)deployed.** We will incorporate appropriate job responsibilities in leadership, managers, and other staff positions. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, particularly for personnel who will have any direct or indirect contact with children and/or vulnerable adults. We may include in performance management/ feedback processes of senior managers, the adherence to create and maintain an environment which promotes this policy and Safeguarding Code of Conduct and to prevent sexual harassment, exploitation and abuse, and child abuse.
- ii. **CARE will ensure all Personnel (employees, associates & stakeholders) are aware of our Safeguarding Policy, our expected behaviours and conduct, and how to report wrongdoing by**

incorporating CARE's expectations on the prevention of sexual harassment, exploitation and abuse, and child abuse in relevant codes of conduct, new employee orientations, awareness raising training and refresher courses, and through regular internal communications.

c. Partners –

- i. **CARE will promote and require safeguarding with partners.** CISSD will ensure adequate safeguarding assessments as part of due diligence processes when considering new and existing partnerships. We will choose our partners based on their commitment to social justice and equality, their organisational values, and how they safeguard their staff and program participants, as well as on their suitability to deliver the work we require of them.

We will ensure that when engaging in partnerships, sub-grant or sub-recipient agreements,

a) incorporate this Policy as an attachment or otherwise implement reasonable due diligence and monitoring procedures of its sub-awards consistent with this Policy.

b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this Policy; and expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual harassment, exploitation and abuse, and child abuse, to investigate and report allegations in a timely manner, or to take corrective actions when sexual harassment, exploitation or abuse, or child abuse has occurred, shall constitute grounds for CARE to terminate such agreements.

c) We will work collaboratively to build capacity in our respective organisations to achieve our safeguarding commitments. We will respect our partners, sub-grantees, and sub-recipients and where possible and necessary, support them in having the skills and capacity to fulfil their responsibilities consistent with this policy.

d) For vendors, consultants, independent contractors, and the like, CISSD may incorporate this Policy as an attachment to any written agreement or otherwise develop a summary of the requirements contained in this Policy and the provisions noted in this section.

- ii. **CARE will collaborate on safeguarding within the sector**, including with communities, other organisations, donors, governments, global civil society networks and local partners, to advance our practices and contribute to wider efforts to prevent and respond to sexual harassment, exploitation and abuse, and child abuse

d. Embedding Safeguarding in our Work –

- i. **CARE will undertake safeguarding risk assessments** to identify areas of safeguarding and sexual harassment, exploitation, and abuse, and child abuse risks, and document steps that are being taken to remove or reduce these risk

- ii. **CARE will incorporate safeguarding measures into programs and throughout the project cycle.** We will do this through our collaborative program design approach, including with our partners and program participants, at all stages to produce better design, monitoring and evaluation of safeguarding in our programs. We aim to identify and mitigate, or minimise, risks arising from our programs.

- iii. **CARE will ensure that multiple mechanisms for reporting sexual harassment, exploitation and abuse, and child abuse are accessible** and sensitive to the differing needs of anyone wishing to

report, including vulnerable adults and children most at risk of sexual harassment, exploitation and abuse, and child abuse, the communities we work with, our partners, and CARE Employees and Related Personnel.

CISSD will involve program participants in the design, monitoring and evaluation of community-based reporting mechanisms.

CISSD will include documented reporting procedures in relevant local languages. CARE will raise community awareness on the expected behaviours of our Employees and Related Personnel and on how to make a report. CARE will ensure that anyone responsible for receiving reports understands how to carry out their duties and handle them in a safe and confidential manner. CARE will be transparent with survivors around any obligations or actions that may need to be taken as a result of their report, including referral to third parties. All actions will be informed by an assessment of risk to all those involved.

e. Response and follow up to Reports –

- i. **CARE will provide support and assistance to complainants and to anyone who has experienced sexual harassment, exploitation and abuse, or child abuse by CISSD Employees and Related Personnel.** This may include medical treatment, legal assistance and psycho-social support. Our support and assistance will be informed by a survivor-centred approach, feasibility, and an assessment of risk to all those involved.
  - ii. **CARE will take appropriate actions to the best of CARE’s abilities to protect persons from retaliation** where allegations of sexual harassment, exploitation and abuse, or child abuse involving CARE Employees or Related are reported in good faith.
  - iii. **CARE will ensure that all allegations of sexual harassment, exploitation and abuse, and child abuse by CISSD Employees and Related Personnel are thoroughly examined, risk-assessed, and where needed, investigated and/or referred to another agency for investigation or reported to law enforcement.** CISSD’s investigations will be conducted in a timely, safe, and professional manner by those with appropriate training and experience in sensitive investigations and informed by gender-sensitive and survivor-centred approaches. Investigations will include an assessment of risk to all those involved. We will collaborate with our partners to have the capacity to similarly investigate allegations of sexual harassment, exploitation and abuse, and child abuse by their staff.
- f. **CARE will take swift and appropriate action with any Employee or Related Personnel who breach this policy by perpetrating sexual harassment, exploitation and abuse, and child abuse.** This may include administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser’s country of origin as well as the host country. All actions will be informed by a survivor-centred approach and an assessment of feasibility and risk to all those involved.

## **POLICY 1: PREVENTION, PROHIBITION & REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PoSH)**

### **1.1. POLICY STATEMENT**

CARE India Solutions for Sustainable Development (referred to as CISSD) is committed to the highest standards of openness, probity, and accountability. This Policy is having been written to ensure CISSD's work environment that is free from any form of unlawful discrimination or harassment. The management (which is referred to as CEO) is committed to a work environment where all employees are considered equal, and the dignity of each employee is respected and promoted. Any person, who is involved in creating an offensive, hostile, or sexually threatening environment, shall be subject to appropriate disciplinary action amounting to termination.

### **1.2. SCOPE AND APPLICABILITY**

This policy applies to all allegations of sexual harassment of women in the workplace. This policy shall be applicable to all CISSD Employees, Consultants, Volunteers, Interns, Board or a third party interacting with CISSD stakeholders and Partners, Vendor, Associates (including part-time, temporary, contractual personnel, trainees, persons on probation and apprentices) while on Organisation engagement anywhere in the country as well as in any engagement with other third parties associated with the (such as vendors, consultant's customer employees, candidates, visitors or guests) who must comply with all its requirements.

This policy applies to all CISSD employees and related personnel at all times whilst representing CARE. This includes outside of working hours at CISSD events, CISSD and partner programmes and the workplace.

### **1.3. DEFINITIONS:**

#### **1.3.1. Workplace**

A workplace includes all places visited by an employee arising out of or during employment. It also includes extended workplace while travelling (such as transportation provided by), place of stay and work, venue of work-related events, work-related venue of entertainment or leisure or work from home

The workplace includes:

- a. All offices or other premises where CISSD has the reach and programs.
- b. All CISSD-related activities performed at any other location away from the CISSDs location of office or programs or any event/ program organised for social or business events.
- c. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

- d. Any social program or other events related to CISSD's work where any conduct or comments may have an adverse impact on the workplace or workplace relations.
- e. Workplace will also include, 'Working from Home'. There is zero-tolerance for any form of online Sexual Harassment on Video Call/ virtual platforms.

### 1.3.2 Sexual Harassment

Sexual harassment is defined under 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' (read with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (collectively, "the Act") and this Policy, as any conduct that is unwelcome and sexual in nature, whether direct or indirect, including –

- a. Physical contact and advances
- b. A demand or request for sexual favours
- c. Making sexually coloured remarks
- d. Circulating obscene content by email, SMS, or MMS
- e. Showing pornography, or
- f. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.
- g. When any such act or acts are committed in circumstances where such conduct is humiliating and is likely to constitute a health and safety problem, it will amount to sexual harassment that violates this Policy.

Sexual harassment may occur as a single incident or a series of incidents. The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- a. Implied or explicit promise of preferential treatment in employment
- b. Implied or explicit threat of detrimental treatment in employment
- c. Implied or explicit threat about the present or future employment status
- d. Interference with work or creating an intimidating or offensive or hostile work environment
- e. Humiliating treatment likely to affect the health or safety of the employee

Sexual harassment may be of two kinds: (1) indirect, also referred to as a "hostile work environment" and (2) direct, also referred to as a "quid pro quo".

- a. The indirect form of sexual harassment is any instance of unwelcome conduct that, taken individually or together, have the purpose or effect of (i) creating an intimidating, hostile, or offensive work environment, and (ii) unreasonably interfering with another's work performance. Examples of this type of sexual harassment include pornography in public places, foul language or joking of a sexual nature.
- b. Sexual harassment by one who is in a position of power or influence constitutes direct, or quid pro quo, sexual harassment when (i) submission by an individual is made either an explicit or implicit term or condition of employment, or (ii) submission to or rejection of such conduct is used as the basis for employment decisions affecting that employee such as promotions, demotions, salary raises, hiring or termination.

### 1.3.3. Complainant

The Complainant refers to the individual filing the complaint. They may also be referred to as the 'survivor'. This includes anyone employed or associated with the Organisation in a full-time/part-time capacity as a permanent or temporary employee, contractor, client, partner, consultant, vendor, intern, or volunteer, visitor, beneficiaries.

### 1.3.4. Respondent

The Respondent refers to the individual against whose actions the complaint has been filed. Thus, referring to anyone employed or associated with the Organisation in a full-time/part-time capacity as a permanent or temporary employee, contractor, consultant, vendor, intern, or a volunteer.

In a situation where the allegation of sexual harassment is made against a third party, the Organisation will work with the direct employer of the alleged offender to decide how the matter should be dealt with.

### 1.3.5. Witness

Individuals who have been called upon by either the Complainant, Respondent or Committee to report their statements as part of the inquiry proceedings. Such a witness may or may not be an employee of the Organisation but can provide valuable evidence with regard to the allegations as are set out by the Complainant/ Respondent.

## 1.4. CISSD STANDARDS

In addition to the standards of behaviour implied in the definitions above, the specific provisions of the Code of Conduct will apply to all employees and representatives, as enlisted in the sections above. No one has the right to sexually harass any person in CISSD. .

Any person in our Organisation who is found to have breached this policy, and to have committed harassment in any form, will be subject to strict legal action, including termination of services, irrespective of the seniority within CISSD. If representatives of our contractors or vendors sexually harass a CISSD employee or related personnel, CISSD will demand that the Organisation they work for takes appropriate disciplinary action and/or refuse to work with this person in the future.

**Note:** To ensure the implementation of the policy, we will ensure that the CISSD standards are incorporated as part of the agreement around PSEA/SH with CISSD with vendors, consultants or any other related personnel.

**Sexual harassment is never too minor to be dealt with.** Any kind of harassment can cause distress and harm to an employee and create a hostile workplace. CISSD will take seriously every complaint and thereafter, implement necessary and appropriate disciplinary action against the subject of complaint. . Sexual harassment is about how we make others feel. Many do not consider behaviours like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labelled that way. If a person's behaviour in the workplace causes harm, distress or makes a person feel unsafe or uncomfortable, they are in breach of this policy, CISSD will thoroughly investigate and respond with appropriate legal and/or disciplinary action.

CISSD will listen to survivors of sexual harassment and always ensure that investigations are properly conducted by the Committee constituted for the purpose. We will not allow further victimization of harassed women employees. We will fully support employees who were sexually harassed and will not take any adverse action against them. For example, we will not move them to positions with worse pay or benefits or allow others to retaliate against them.

CISSD has a zero-tolerance approach toward sexual harassment, exploitation, and abuse. CISSD will take seriously all reports of sexual harassment, exploitation, and abuse. CISSD will take action in response to complaints informed by a survivor-centered approach, which means that the needs and the wishes of the survivors guide our response, that survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritised.

### **1.5. SEXUAL HARASSMENT AND UNLAWFUL BEHAVIOURS**

Sexual harassment is any unwanted conduct of a sexual nature. This includes but is not limited to,

- A request for sexual favours
- Verbal or physical conduct or gesture of a sexual nature
- Behaviour of a sexual nature that makes the recipient feel humiliated, offended and/or intimidated,

In other words, Sexual Harassment can be, but is not limited to is:

- unwanted sexual behaviour
- Exploitation i.e. demanding sexual favour / act in return for social, political, sexual or financial gain
- verbal statements or physical action or gestures that describe a sexual act, or unwarranted action of a sexual nature, that (a.) the recipient has made it clear that the behaviour is unwanted; (b.) the recipient feels humiliated, offended and/or intimidated by the conduct; or (c.) the perpetrator should have reasonably anticipated that the other person would be offended, humiliated and/or intimidated by the conduct.

In addition to the above, the following acts below are also considered sexual harassment at the workplace. This includes but is not restricted to,

- Unwelcome sexual advances (verbal, written or physical)
- Sexually coloured remarks, including but not limited to vulgar/indecent jokes; innuendos or taunts; letters, phone calls, text messages, e-mails with a sexual message and sexually suggestive gestures
- Showing pornographic content or the like
- Any other unwelcome physical, verbal, or nonverbal sexually oriented conduct, including but not limited to teasing, voyeurism, physical confinement.
- Unwelcome physical contact and advances such as touching, stalking, sounds which might have implicit/explicit sexual connotation/overtones

Ignorance of this Policy and/or mistaken belief in its scope, definitions and applicability will not be considered as a defence during investigation.

## 1.6. UNWANTED CONDUCT

Unwanted conduct is any conduct that is not requested or invited by the recipient, and the recipient of the conduct considers such conduct to be undesirable or disrespectful. Whether the behaviour was unwelcome is a subjective question from the perspective of the person alleging sexual harassment, CISSD will respect the feeling of the recipient and will not dismiss or undermine their experience. In this regard, how their conduct is perceived and experienced by the recipient is important, and not the intention behind the conduct. Unwanted conduct can be identified with the following characteristics:

- The survivor has explained that the conduct is unwanted,
- The survivor feels humiliated, offended and/or intimidated by the conduct, or
- Violated the dignity of the survivor
- The perpetrator has anticipated that the other person would be offended, humiliated and/or intimidated by the conduct.
- The unwanted conduct has created an intimidating, degrading, humiliating or offensive environment for the survivor and/or other employees.
- Unwanted conduct is any behaviour that is not requested/ wanted by the victim, and by worker/ labour is considered as inappropriate behaviour.
- CISSD understands that the survivor may not be in position to inform the perpetrator that their conduct is unwanted due to power dynamics between the survivor and the perpetrator as well as shame, stigma, risk of further abuse and harm, CISSD will ensure that their approach to investigation is survivor-centered, as stated above in CISSD Standards.

## 1.7. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Organisation have a personal responsibility to ensure that their behaviour is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

### **Prevention of Sexual Harassment Consistent along with the applicable laws:**

CISSD will:

1. Ensure all reasonable steps for the prevention of sexual harassment at work are ensured, such as: Widely circulating our policy against sexual harassment amongst employees.
2. Provide training to employees, and sensitising all employees, consultants, volunteers, Interns, Board, etc, on our policy against sexual harassment.
3. Establish an Internal Committee (IC) also may be called the Prevention of Sexual Harassment Committee (PoSH) to respond to sexual harassment complaints.
4. Inquire about complaints and implement the findings of the Internal Committee within prescribed timelines.
5. Inform employees of the relevant laws and create awareness via enterprise-level mailers.

### **Responsibility of Management:**

- Create and maintain a working environment in which all employees feel respected, and safe from harm, abuse, exploitation and harassment
- Prohibit, prevent and deter commission of acts of sexual harassment
- Implement the PoSH Policy by prohibiting gender-based discrimination and providing a safe & harassment-free work environment
- Raise awareness of the POSH Policy amongst its employees, partners and related personnel by publication, notification, and circulation of the POSH Policy
- Ensure that all employees and related personnel receive training on the POSH policy, and sensitise employees about sexual harassment issues
- Be alert to observe any inappropriate conduct or comments, and report these in line with the PoSH policy
- Refer to the Internal Committee in accordance with this Policy, when instances of sexual harassment which occur within the workplace are brought to their attention.
- Provide fair and impartial procedures for resolution, inquiry or prosecution of acts of sexual harassment by taking all necessary steps, including those more particularly provided hereinafter
- Implement the recommendations of the Internal Committee
- The organisation shall make applicable filings to the appropriate Government authority with respect to the compliance with the Act
- Upon becoming aware of the commission of an act of sexual harassment at workplace, the organisation shall have the right to initiate suo moto action, even in the absence of a formal complaint being filed by any aggrieved employee.

### **Third party Sexual harassment:**

It is important to note that, in an event when a third party is engaged in the incident of Sexual Harassment as the Respondent, the law mandates that the matter be addressed appropriately by the employer. The investigation authority when a third party is involved is based on the circumstances. If the Respondent is from a third party we can, as an IC, reach out to the Respondent's company IC/Management who will take the case forward. Where there is no action or the IC panel does not investigate, the complainant has to file the said complaint with the Local Complaint Committee and/or refer the matter to the police as per the situation. The Internal Committee should provide reasonable assistance to the complainant to seek police assistance or file the complaint with the Local Complaints Committee. **(Please note that only a female Employee, i.e., an Aggrieved Woman under the Act) can approach the LCC or Police)**

In case the complainant is a Third-party and the Respondent is an employee of our Organisation, our IC is mandated to take up the complaint and proceed further as per due process.

The law has created the Internal Committee as a grievance redressal mechanism for any woman in connection with the workplace experiencing sexual harassment. According to the law, a complainant can be an employee, direct or indirect contract employee, a volunteer, an intern, an apprentice, a daily wage staff or even a visitor to the premises in relation to work who can raise a complaint of sexual harassment if challenged with one.

### **Statutory Requirements under POSH Act**

The POSH Act is binding on all and mandates that all Public and Private Sector Organizations in India comply with certain statutory requirements. The onus to ensure PoSH at work for women lies on the employers and managements and for this, they are directed to:

- **Form an Internal Committee,**
- **Provide Periodic PoSH Training on Sexual Harassment law, and**
- **Develop an effective Complaint lodging and Redressal Policy**

### **Employee rights and obligations pursuant to the preventive steps under this policy, every employee should:**

- Become fully informed about the contents of this policy and attend workshop(s) or training(s) as and when required.
- In some states, training will be required under the law. Cooperate with any measures introduced to promote equal opportunities at the workplace.
- Respect the sensitivities of others; never take discriminatory actions or decisions which are contrary to the letter and spirit of this policy.
- Offer information and support to any person who the employee suspects are being harassed.
- Maintain confidentiality regarding any aspect of an inquiry to which the employee may be a party.
- Be aware that the employee retains the right to file a complaint of unlawful discrimination or sexual harassment under the law of the land with local authorities including law enforcement authorities.
- If an employee chooses to file such a complaint with police authorities, the IC will provide all reasonable assistance in this regard. The IC will ensure that their actions are informed by a survivor-centered approach, prioritizing the rights, needs and safety of the complainant / survivor. The IC will be aware of and will follow local customs with respect to people's interactions at the workplace.
- Continuous sensitization of employees to issues on prevention of harassment.
- CISSD will sensitise and train employees on issues concerning the prevention of sexual harassment and abuse in the workplace.

#### **1.8. Internal Committee (IC)**

An Internal Committee (IC) will be set up by the Organisation which will deal with all cases of alleged sexual harassment whether escalated to it by any employee or taken up *suo moto* by the Organisation, to prevent and respond to sexual harassment and to otherwise implement the Policy. The Organisation may have multiple ICs constituted to oversee specific administrative units or offices.

### **COMPOSITION OF IC Panel:**

The Internal Committee is responsible for conducting an inquiry into every formal written complaint of sexual harassment and making recommendations to the Organisation on the actions to be taken against the Respondent. The IC will also be responsible for the preparation and submission of the annual report prepared by the IC for each calendar year to be submitted to the District Officer or employer and maintain record of such annual reports. **CISSD will constitute Internal Committees to cover every location and area of operation. Each Committee must consist of the following members:**

- **A Presiding Officer:** This must be a senior women employee of the Organization/ State Office.
- **Minimum two (2) employee members:** These employees must be aware and sensitive to gender issues and dedicated to the cause of women or possess some legal knowledge on related matters.
- **One (1) external member:** This should be from an NGO or Association committed and familiar to the cause of women and issues related to sexual harassment. (Section 4(4) of the POSH Act lays down that the external members for PoSH who are appointed from non-governmental organizations or associations are eligible for remuneration)

### **The composition should be such that a majority of the total members must be women**

- The names and contact details of the members of the Internal Committee be displayed on the notice board and in this Policy (Please see Annexure). The maximum term of each member of IC shall be 3 (Three) years from the date of their nomination.
- A person shall cease to hold office as a member of the Committee if she/he ceases to be an employee on account of resignation, termination, or death or for any other reason whatsoever, and in such case the vacancy shall be filled immediately by the Organisation. No IC member will have any stake in the investigation. For e.g., none of the IC member will be in the direct line of reporting of either the complainant or respondent. If any of the IC member is in any way related to either the complainant or respondent, then that IC member is required to be replaced.
- The quorum for meetings of the Internal Committee will require a minimum of 3 members to be present, including the Presiding Officer as well as one other female member.

(7) **Disqualifications:** A person shall be disqualified from being appointed, elected, nominated or designated, or for continuing, as a member of the Internal Committee, for any period of time, inter alia, during which there is any complaint concerning sexual harassment pending against him/her or if he/she is found guilty of sexual harassment.

### **A member of IC may be disqualified on the following grounds:**

**#1. Disclosure of Confidential Information:** If a member reveals the details of matters which are required to be kept confidential under the POSH Act then he/she can be disqualified.

If the member discloses any one of these:

- About a complaint submitted to the IC
- Identity of the complainant and/or the respondent or witnesses

- Details of inquiry proceedings
- Recommendations of the sexual harassment committee
- The action that was taken by the employer

**#2. Conviction or Inquiry:** If a person is convicted, or an inquiry is pending against him/her regarding any offence under any law, then the member will be disqualified.

**#3. Found Guilty:** Similarly, if a member of the IC is found guilty, or any disciplinary proceeding is pending against such a person, then also he/she will be liable to disqualification.

**#4. Abuse of Position:** If a member of the Internal Committee has abused his/her position, then their disqualification is recommended. The continued membership of such a member in the ICC will not only be deemed to be detrimental and harmful but also against the public interest.

**Duties, obligations & major functions of the Internal Committee include:**

1. To create awareness on the rights of employees against sexual harassment.
2. To prevent sexual harassment at the workplace & Implementation of the Anti-Sexual Harassment Policy at the workplace
3. To strive to resolve complaints by the aggrieved complainant
4. To apply a survivor-centered approach to all investigations
5. To conduct enquiry on any complaint/s received from employees and for ensuring time bound treatment of such complaints (Initiation of inquiry at the earliest)
6. To provide procedure for the resolution, settlement or prosecution of acts of sexual harassment by taking all steps in accordance with applicable law;
7. Final decisions and recommendations with regard to the complaint shall rest with the Internal Committee.
8. Submit the inquiry report along with recommendations to the employer (CEO or designated person as nominated by the CEO)
9. Submit an Annual Report (Including details like the number of cases filed at their disposal, etc.)
10. Any other obligations that may be prescribed under applicable law, but not limited to-

- Bring about awareness about what comprises 'sexual harassment' at the workplace by way of workshops, posters, documents, notices, seminars, etc.
- Publicize the policy framework effectively
- Provide the victims with a safe and accessible mechanism of complaint
- Redress the complaints in a judicious manner
- Provide interim relief to the complainant
- Provide an opportunity for conciliation wherever possible
- Strictly adhere to the principles of natural justice at all stages of the proceedings
- Whenever required, forward the complaint to the police
- Maintain confidentiality in regard to the proceedings taking place before the Committee. The committee will be trained and empowered to take appropriate decisions on the proceeding on a case to case basis

### **1.9. FILING A COMPLAINT**

1. Any aggrieved employee may approach the Internal Committee with a complaint of sexual harassment under this Policy.

The following steps will be followed in this regard:

a. A complaint of sexual harassment can be filed within a time limit of three (3) months from the date of incident and in case of a series of incidents, from the date of the last incident. This may be extended to another three (3) months if the Complainant can prove that grave circumstances prevented her from filing a complaint. The reasons for the same need to be recorded in writing.

b. The Complainant has to submit the complaint to the Internal Committee in writing or on email along with supporting documents, names and addresses of witnesses and the said complainant will be afforded complete confidentiality. If a complaint cannot be made in writing, the Presiding Officer or any member of the Internal Committee shall provide all reasonable assistance to the complainant to make the complaint in writing. Where the aggrieved complainant is unable to make a complaint on account of physical or mental incapacity or death or otherwise, his/her legal heir or such other person as prescribed under the Act may make a complaint on her behalf.

c. Within seven (7) working days of the receipt of the complaint, the Internal Committee has to send a copy of the complaint to the Respondent, who will have ten (10) working days to file a reply along with a list of documents, names and addresses of witnesses.

d. At the first meeting of the Internal Committee, the Complainant shall be heard and the Committee may, before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation; provided there can be no monetary settlement as the basis of conciliation.

e. If a settlement has been arrived at, the Internal Committee needs to record the settlement and forward the same to the Organisation to act/ take action as specified in the recommendation.

f. The Internal Committee needs to provide the copies of the settlement, as recorded, to the Complainant and the Respondent. This must also be added to their HR file.

g. Where a settlement has been arrived at, no further inquiry needs to be conducted by the Internal Committee. However, in the event that no conciliation is requested for by the Complainant, or no settlement has been arrived at between the parties, and / or if the Complainant informs the Internal Committee that any term or condition of the settlement arrived at earlier has not been complied with, then the Internal Committee in the above situations, shall proceed to inquire into the complaint and investigate.

### **1.10. PROCEEDINGS OF THE INTERNAL COMMITTEE**

1. The Internal Committee is intended to be an independent, objective, and unbiased fact-finding body established to investigate any complaints of sexual harassment in a fair, reasonable and time-bound manner

in a neutral environment. The Internal Committee shall conduct the inquiry in accordance with principles of natural justice.

2. For the purpose of making an inquiry the Internal Committee shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following:

- a. Summoning and enforcing the attendance of any person and examining him/her on oath.
- b. Requiring the discovery or production of documents; and,
- c. Any other matter which may be prescribed.

3. The Internal Committee shall give every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective cases and to ensure that the Complainant and the Respondent have full opportunity to present their claims, witnesses and evidence which may establish or substantiate their claims.

4. Both the Complainant and the Respondent shall have the right to submit supporting evidence and shall have the right to bring their respective witnesses, if any, to be examined by the Internal Committee.

5. No observations regarding the work and behaviour of either the complainant or respondent shall be made which are not related to the alleged act of sexual harassment. However, the Committee may consider as relevant any earlier complaints of sexual harassment against the Respondent or false complaints against the Complainant.

6. If the Complainant or the Respondent fails, without sufficient cause, to be present before the Internal Committee for three (3) consecutive hearings, the Internal Committee will give a notice of fifteen (15) days to the concerned party before terminating the inquiry proceedings or giving an ex-parte decision on the complaint.

7. If considered appropriate by the Internal Committee, all meetings of the Internal Committee including with the Complainant, the Respondent or any witnesses shall be held outside the relevant office and at a neutral venue.

8. The Complainant, the Respondent or any other person that the Internal Committee meets with, interacts with, or has a teleconference or video conference with, for the purpose of inquiry into any complaint of sexual harassment shall be bound by strict confidentiality and each such party shall not be permitted to discuss the Internal Committee proceedings with any third person.

### **1.11. Action During Pendency**

1. During the pendency of an inquiry, on a written request made by the Complainant, the Internal Committee may recommend to: a. Transfer the Complainant or the Respondent to any other workplace; or b. Grant leave to the Complainant up to a period of three (3) months; or c. Grant relief to the Complainant by providing a work-from-home option

2. The leave granted to the Complainant shall be in addition to the leave he/she would be otherwise entitled to.

3. During the pendency of the inquiry, if the Committee is independently of the view that the presence of the Respondent at the workplace may be detrimental to the interest or to the conduct of a free and fair inquiry, it may recommend to the organisation to place the Respondent under 'administrative leave' pending completion of the inquiry, provided that the person sought to be suspended is a direct employee of the organisation. On receipt of such recommendation from the Internal Committee, if CISSD decides to place the Respondent under

suspension/administrative leave, he/she will be entitled to full wages during such period of suspension/administrative leave, pending inquiry. Such suspension/administrative leave order may also include an order prohibiting the Respondent from accessing any of the organisation's premises, hardware or software, online networks, systems, platforms, databases, email, data, employees, vendors or customers.

4. Where the Respondent is an outsider, during the pendency of the investigation of the complaint and even thereafter, if found guilty, the Respondent shall not be allowed to enter the Organisation premises except for the purpose of attending the Internal Committee proceedings.

### **1.12. Disciplinary sanctions**

CISSD has a zero-tolerance approach to all forms of harassment, abuse and exploitation.

If the Internal Committee, after completing their Enquiry, finds an employee guilty of sexual harassment; then the Internal Committee may recommend any of the following actions to be taken against the said Respondent Employee by the Disciplinary Authority, :

- Termination of services of the employee found guilty of the offense
- Get a "below expectations" performance review.
- See expected promotions and/or salary increases freeze for [a year.]
- Undergoing a counselling session
- A written warning to the Respondent and a copy of it maintained in the employee's file
- Change of work assignment/transfer for either the Respondent or the Complainant
- Written apology to the Complainant
- Reprimand or Censure
- Withholding of Promotion
- Withholding of pay rise or increments
- Termination of services of the employee found guilty of the offense
- Carrying out community service
- Impose a fine in accordance with the Act

We apply these disciplinary actions uniformly and commensurate to the gravity of the proved misconduct.

### **1.13. INQUIRY REPORT**

1. All proceedings of the Internal Committee will be duly recorded along with the statement of witnesses. It shall be endorsed by the Complainant and Respondent by signing on the same, in token of authenticity thereof. The refusal to endorse the same by either party shall be noted by the Internal Committee. The reason for the refusal shall also be duly recorded in the said proceedings then and there.

2. On the completion of the inquiry, the Internal Committee shall submit a written report to the Disciplinary Authority within a period of ten (10) days from the date of completion of the inquiry proceedings and make the same available to the concerned parties. The inquiry report shall specify the details of the charges against the Respondent, the evidence submitted in the inquiry and the reasons for the Internal Committee's decision.

#### **1.14. CONFIDENTIALITY**

The Organisation understands that it is difficult to come forward with a complaint of sexual harassment. Therefore, to protect the interests of the Complainant, Respondent, and Witnesses, confidentiality will be maintained throughout the inquiry process and even thereafter, to the extent practicable and appropriate under the circumstances.

The identities of the Complainant, the Respondent, and Witnesses involved with the process is to be kept confidential. Anyone (Witness, Committee Members, Respondent or Complainant) who breaches this confidentiality clause is liable to be penalised with consequences ranging from a fine of five thousand rupees to additional disciplinary action; based entirely on the facts and circumstances of each case.

#### **1.15. ACCESS TO REPORTS AND DOCUMENTS**

All records of complaints, including contents of meetings, results of the inquiry, and other relevant material will be kept confidential by CISSD except where disclosure is required under disciplinary or other remedial processes or where otherwise required by law. All documents will be password protected, with limited access. All hard copies of documents will be scanned, and hard copies subsequently destroyed. Where this is not possible hard copies must be files in locked storage with access limited.

#### **1.16. PROTECTION OF COMPLAINANT AND WITNESSES FROM RETALIATION**

CISSD is committed to ensuring that no employee or witness who brings forward a harassment complaint or testifies to it, is subject to any form of retaliation.

Any employee who retaliates against an employee who has reported in good faith, a sexual harassment claim, will be subject to disciplinary action, which may include dismissal. Any reprisal will be considered as a separate case of misconduct. Anyone who abuses this procedure (for example, by maliciously putting an allegation knowing it to be untrue) would also be subject to disciplinary action including dismissal from service.

In the event that the Complainant or any Witness of the Complainant is being supervised by the Respondent or any of its Witnesses, then such reporting assignments will be changed to the extent possible by CISSD.

CISSD will not victimize or discriminate against a Complainant or Witnesses while dealing with complaints of sexual harassment.

#### **1.17. When an Appeal can be Filed Against the Recommendations of the IC**

Since the Organisation has a presence pan-India, an internal mechanism for appeal to the Central Apex Committee has been set up. The Complainant as well as the Respondent has the right to file an Appeal to the Central Apex Committee of the Organisation, if they are not satisfied with the recommendations made by the Internal Committee. The said Appeal can be made to the Central Apex Committee within 15 days of receiving the recommendations of the Internal Committee.

The Central Apex Committee can ONLY review the recommendations made by the IC and CANNOT hold an Enquiry. It shall record its observations in writing and submit the same to the Disciplinary Authority, along with a copy to the Complainant and Respondent, within a period of 15 days from the receipt of the Appeal.

Further, as per the applicable statute, the Complainant and/or the Respondent (if a woman) can file an Appeal before the Court or Tribunal against the recommendations of the Internal Committee within a period of 90 days.

They can take this step in the following circumstances: –

- Recommendations made by the Committee under Section 13(2) i.e. when the allegations have not been proved and no action is to be taken.
- Recommendations made under Section 13 (3) i.e. when the allegation has been proved and action is to be taken.
- Recommendations made under Section 14 i.e. when a malicious complaint or false evidence has been found and action is to be taken against it.
- Recommendations made under Section 17 i.e. when the penalty has been imposed for publishing confidential information.

### **1.18. Consequences of Non-compliance with the Provisions under the POSH Act**

As the POSH Act is legally binding on all organizations, not abiding with the provisions leads to far-reaching consequences.

The organisation/ employer is bound by certain mandatory obligations and one of them is constituting an Internal Committee. In case of failure to do so, the Act imposes a penalty of 50,000 rupees.

If in case there is a repetition of the same offence it would attract double penalty that is, 100,000 rupees and at times may even lead to deregistration or revocation of the license of the concerned organization.

### **1.19. AMENDMENTS**

The Organisation may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Local laws. Any such alterations or amendments or rescinding will be intimated to the employee.

In conclusion, the Organisation reiterates its commitment to providing its employees with a workplace free from sexual harassment, where every employee is treated with dignity and respect.

## **POLICY 2: PREVENTION OF WORKPLACE HARASSMENT -Exploitation & Abuse**

### **Non-Violence and Harassment at Workplace**

All kinds of violence, exploitation, abuse, harm and threatening or bullying behaviour are prohibited, both within and outside of the workplace. CISSD is committed to providing all its employees and related personnel with a work environment free of harassment, harm, abuse, and bullying. This policy prohibits all types of harassment including sexual harassment and harassment based on gender, sexual orientation, medical condition, race, religion creed, colour, national origin or ancestry, physical disability, age, work environment, or any other biases.

If case an employee, or related personnel is being harassed, tortured, or bullied, they may report to their immediate supervisor or to the Human Resources Department.

CISSD classifies Violence/Abuse into the following categories which are all considered to be forms of misconduct: -

- **Physical Abuse**- Physical abuse occurs when a person purposefully injures or threatens to injure a child. This may for instance, take the form of slapping, hitting, punching, shaking, kicking, beating, burning, shoving, or grabbing. Physical abuse can be a single or repeated act. It doesn't always leave visible marks or injuries
- **Sexual Abuse**- Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
- **Sexual Exploitation** - 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, socially, or politically from the sexual exploitation of another.
- **Sexual Harassment** - Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident.
- **Emotional Abuse**- Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.
- **Spiritual Abuse**- Spiritual (or religious) abuse occurs when someone uses an individual's spiritual beliefs to manipulate, dominate or control that person.
- **Cultural Abuse** - Cultural abuse occurs when an individual is harmed as a result of practices that are part of her or his culture, religion, or tradition.
- **Verbal Abuse**- Verbal abuse occurs when someone uses language, whether spoken or written, to cause harm to an individual.
- **Financial Abuse**- Financial abuse occurs when someone controls an individual's financial resources without the person's consent or misuses those resources
- **Neglect**- Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

The above is not exhaustive and can only be used as a guide for examples of Violence/Abuse

## Maintaining a Safe Environment

Every employee is responsible maintaining a safe and respectful workplace. CISSD has a zero-tolerance approach to all forms of violence, abuse, harm, exploitation and/or threatening or bullying behaviour.

All employees and related personnel will commit to not:

- Making harassing or threatening phone calls.
- Sending harassing or threatening emails or other written communications to anyone.
- Treat colleagues, partner staff or related personnel in an undignified or disrespectful manner
- Intentionally causes harm to others
- Using unlawful, derogatory or intimidating language as a way of communication
- Stalk any other person
- Destroy personal and/or Organisation assets
- Possess dangerous items of any nature such as weapons, explosives or firearms on CISSD's property, or on their own person while conducting business off-site.
- Steal assets belonging to CISSD.

Any violations of these guidelines for maintaining a safe environment are grounds for disciplinary action, up to and including potential termination in accordance with local laws.

## Definitions

**'Good faith'** is taken to mean a disclosure which is made with honest intentions without malicious reason or spite.

**"Bullying"** is behaviour directed either against an individual or a group of individuals, that creates a threatening or intimidating environment undermining the confidence and self-esteem of the recipient(s). It could be an abuse or misuse of power, real or perceived, that humiliates or injures the recipient(s).

**Examples of bullying** include but are not limited to:

- Abuse of authority by a line manager or their acting in such a way that the employee feels threatened or coerced. Making unreasonable or intimidating demands of an employee to deliver beyond the responsibilities of their role.
- Aggressive or intimidating behaviour towards an individual including shouting or unreasonable anger.
- Repeated unfair criticism or destructive and negative criticism along with lack of reasonable support for future improvement.
- Criticism in front of others that humiliates and undermines them including by email.
- Criticism that focuses on a personal characteristic rather than work performance.
- Ostracising someone e.g. refusing to speak to them, blatantly ignoring their views or comments, or deliberately excluding them from work related or social activities.
- Deliberately imposing grossly excessive or unachievable workloads or impossible deadlines in order to make life difficult for a particular employee.
- Unjustified micromanagement that may undermine confidence or disempower an individual.
- Coercion or pressure to perform social favours or participate in religious or political activity.

- Withholding vital work-related information in order to embarrass someone or make them look foolish.
- Making threats or comments about job security without foundation

The above is not exhaustive and can only be used as a guide for examples of bullying.

**“Harassment”** is verbal, non-verbal, or physical conduct, which meets the following criteria:

- Is related to a person’s characteristics, whether they are actual or perceived which include age, disability, caste or social position, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation.
- Is unwanted and uninvited.
- Has the purpose or effect of violating that person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive work environment for that person.

**NOTE: Bullying or Harassment does not include** instances where a line manager raises performance issues in a fair and reasonable way and/or is following the correct and appropriate stages of a performance management, disciplinary procedures or change management processes. If you believe that your line manager has not acted in a fair or reasonable way, you may raise this concern with HR.

## **Responsibilities**

### **All Employees and related personnel:**

- All employees and related personnel have a responsibility to help ensure a working environment in which the dignity of employees is respected.
- All employees and related personnel are expected to ensure that their behaviour towards colleagues and others does not cause offence and are not considered bullying or harassment.
- All employees and related personnel must carefully consider any feedback and modify their behaviour if they have been alerted that this is causing offence.
- All employees and related personnel have an obligation to report bullying or harassment, including if they witness such behaviour.

### **All Managers**

- All managers will ensure that all employees receive a copy of this policy (and any local adaptation) as part of their induction.
- All managers are responsible for preventing harassment and bullying from happening and for taking appropriate action against it. In particular, you must do the following:
  - Be alert to the possibility of harassment/bullying occurring and take prompt action as soon as it is identified.
  - Induct all employees, associates and on expectations of CISSD providing a safe environment free from harassment and bullying.
  - Use good judgment in correcting conduct or behaviour that could be perceived as offensive and remind individuals of CISSDs policy when appropriate.
  - Provide a supportive framework for any individual who complains of harassment or bullying ensuring that the complaint is treated sensitively and rapidly.

- Provide support to anyone accused of bullying or harassment.
- Ensure that allegations are investigated to determine the facts and then determine whether formal action is required. Treat all cases of harassment or bullying with strict confidentiality.
- Ensure that your own management style is supportive and respectful of employees and volunteers and that you do not use bullying or coercive behaviour towards anyone.

### **HR & OD Department**

- Raise awareness of this policy and the principles that underpin it through induction processes, training and awareness raising programs and ensuring the policy is an integral part of any local employee handbook.
- Provide guidance and support when allegations are raised

### **Procedure**

#### **Informal procedure**

If someone believes they are being bullied or harassed, they should try to resolve the issue informally first and explain to the individual concerned that their behaviour is not welcome, and it offends or upsets them. Often the perpetrator is not aware that their behaviour is having this effect on others.

If it is not possible to address this informally, the individual must keep a record of events and raise any allegations with their line manager. This may be done verbally or in writing, should include full details and, if possible, supporting evidence.

Where this is not possible, for example their line manager may be involved, or because they raised the issue before and feel that their allegation was not taken seriously, they should raise this with skip manager, or Sr Director HR & OD.

Depending on the severity of the allegations the line manager, skip manager or Sr Director HR & OD should initially try to resolve matters informally by working closely with all involved. Any agreed actions should be set out in writing and reviews put in place.

#### **Formal procedure**

- 1) The issue should be raised under the local Grievance procedure. The complaint will be formally investigated and if necessary, addressed using the disciplinary procedure, principles and steps relevant to the context.
- 2) When an allegation of bullying or harassment has been made, both parties should be advised there should be no communication between them in relation to the complaint, and consideration should also be given to precautionary suspension or temporary redeployment of the alleged bully or harasser to enable an unbiased investigation to proceed.
- 3) Suspension is not in any way a disciplinary sanction and does not imply that any decision has already been made about the case under investigation. The purpose is only to ensure free and fair investigations.
- 4) At the relevant stages of these procedures, the complainant, or individual accused has the right to appeal using the relevant appeal procedures.

### **Confidentiality and anonymous reporting**

- 1) The identity of anyone who raises allegations and that of the 'accused' will be kept confidential as reasonably practicable. However, due to the nature of some investigation processes it may not be possible to retain complete confidentiality. This includes situations where disciplinary investigations are held and individuals need to make a statement, which may be seen by third parties.
- 2) Anonymous complaints are not recommended as these are difficult to act upon as there may be little or no corroborative evidence to substantiate the allegation. However, any anonymous complaints will still be taken seriously. A decision will be taken based on the information provided, as to whether an investigation is possible or appropriate.

### **Protection and support**

- 1) Any allegations raised will be investigated carefully and thoroughly. Any person accused of alleged misconduct will have the right to present their account of events at the earliest opportunity.
- 2) All those who raise allegations, and those who are accused of bullying or harassment, will be treated fairly and have the right to be accompanied at any time by a colleague not acting in an official capacity (local procedures will apply).
- 3) If someone tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, CISSD will treat this as a serious disciplinary offence which will be investigated in accordance with the relevant CISSD disciplinary policies and procedures.
- 4) Any allegations not made in 'good faith' or found to be false or malicious, will be treated as serious disciplinary offences and will be investigated in accordance with the relevant CISSD disciplinary policy and procedure.
- 5) In addition to the day to day support provided to employees by line managers, HR & OD Department and employees can benefit if necessary, from the relevant employee assistance programme providing psychological and/or counselling support.

### **Substance Abuse/Drug and Alcohol-Free Workplace**

The Organisation requires employees to work free from the influence of any substance, including drugs and alcohol, which may prevent the employee from conducting work activities safely and effectively.

Working under the influence of any substance jeopardizes our commitment to teamwork, with the potential to impact the Organisation and even our communities.

The Organisation reserves the right to have any associate tested, where local law and policies permit, if there is reasonable suspicion that he or she is under the influence of drugs or alcohol.

If an employee is using prescription or non-prescription drugs that may impair alertness or judgment, or witness an Associate who may be impaired and, therefore, possibly jeopardizing the safety of others unless prohibited by local laws, you should report it immediately.

## **POLICY 3: CHILD SAFEGUARDING POLICY- Preventing Child Abuse**

### **3.1. POLICY STATEMENT**

CISSD believes that **all children have the right to be protected from harm, abuse, and exploitation**. CISSD is committed to a culture of safety and accountability. Children are particularly at risk of abuse and exploitation. CISSD will ensure at all times that it is accountable for creating and proactively maintaining operational and programming environments that aim to prevent and deter any actions and omissions by CISSD employees and representatives, whether deliberate or inadvertent, that may place children at risk of any kind of harm or abuse.

The organisation values the importance of creating and maintaining a safe culture that is child focused and community-driven through sustained and meaningful engagement with children, their families, communities, and CISSD representatives.

CISSD employees and representatives must demonstrate the highest standards of good behaviour and conduct towards children, both in their private and professional lives, 24 hours a day and 7 days a week. The organisation has a zero-tolerance approach to child abuse by any of our employees, related personnel, partners, or representatives.

CISSD has created this policy to demonstrate the Organisation's commitment to safeguarding children from harm, abuse and exploitation and to make clear to all in the Organisation and who come into contact with the Organisation, what is required in relation to the protection of children.

CISSD believes that all children have the right to a safe and healthy environment for their development to adulthood.

CISSD has a zero-tolerance approach towards all form of child abuse, exploitation, and harm. CISSD will carefully examine allegations and investigate, and take appropriate disciplinary action where needed, taking into consideration the rights and interests of the survivor, consistent with CARE's survivor-centered approach. CISSD makes very clear that child abuse, exploitation, and harm in any form, perpetrated by our staff, partners of related personnel, towards anyone, will not be tolerated.

CISSD's management will take appropriate remedial measures, following investigation, including implementing measures to mitigate the potential for repetition, and to discipline any of its employees who have be found to have breached the Safeguarding policy.

If an individual commits an act in violation of this Policy, whether an employee of the Organisation or a third party interacting with the Organisation, it will take appropriate remedial measures under the circumstances, including measures to mitigate the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when she or he had actual knowledge of such conduct and the authority to do so.

### **3.2. AIMS & PRINCIPLES**

This policy aims to define the behaviours and actions that constitute child abuse. Additionally, it will lay out the Organisation's expectations for behaviour, the scope of application of the policy and guidelines for reporting and redressal. The Organisation strives to create a safe and nurturing environment for youth, employees, and volunteers so that everyone can grow and learn. Part of creating a safe environment is making sure that children are not harmed in any way while engaging

with the Organisation. To this end, we create a culture where child sexual abuse is discussed, addressed, and prevented. This policy is applicable to all part time and full-time employees (including but not limited to Employees, Consultants, volunteers, and interns)

**The Principles include:**

- 1) **Best Interest of the Child:** The right of the child to have their best interest taken as primary consideration which is a substantive right, a fundamental interpretative legal principle and a rule of procedure. It also implies that institutions, services and facilities responsible for care or protection of children will conform to standards established by competent authorities, particularly in the areas of safety, health and supervision; and reiterates the rights and duties of parents, guardians, other individuals legally responsible for them.
- 2) **Principle of Safety:( No harm, no abuse, no neglect, no maltreatment)** All measures will be taken to ensure that the child is safe and is not subjected to any harm, abuse or maltreatment while in contact with the CISSD .
- 3) **Principle of Equality and Non-discrimination:** All children shall be treated equal and given equal opportunity and treatment. There shall be no discrimination against a child on any grounds including gender, religion, caste, class, place of birth, disability etc. Stigmatizing vocabulary or language will also not be used anywhere.
- 4) **Principle of Confidentiality:** Every child has a right to protection of her/his privacy and confidentiality, in all such matters. Confidentiality shall be maintained when there has been abuse, especially when there has been sexual abuse. However, if a CISSD employee or related personnel has a concern for the welfare of child, the behaviour of staff members or related personnel towards children or received a direct disclosures of abuse, harm, exploitation or neglect from a child they are obligated to report this. At no point must the staff member promise confidentiality to a child but inform the child that they will need to inform relevant employees at CISSD of their disclosure.
- 5) **Principle of Participation:** Every child has a right to be heard, listened to and to participate in all processes and decisions affecting her or his interest and the child's views shall be taken into consideration with due regard to the age and maturity of the child. It has been noted that the right of a child to be heard is not only a right in itself but should be considered in the interpretation and implementation of all other rights.

**3.3. LEGAL STATUTES & FRAMEWORK**

To ensure delivery of the Constitutional safeguards and the commitment to the UNCRC, the Government of India has enacted several legislative measures for protection of children. While all of them encompass provisions for protection or safeguards from some form of violence or abuse the key child legislations in the context of protection of children are the following:

1. The Child Labour (Prohibition & Regulation) Act, 1986 (CLPRA)
2. The Juvenile Justice (Care & Protection) of Children Act, 2015
3. The Commission for Protection of Child Rights Act, 2005
4. The Prohibition of Child Marriage Act, 2006
5. The Right of Children to Free and Compulsory Education Act, 2009
6. The Protection of Children from Sexual Offences Act, 2012
7. The Criminal Law Amendment Act 2013, 2018

However, the two primary legislations that govern child safeguarding issues are **the Juvenile Justice Act and the POCSO Act**.

**The Juvenile Justice Act** is founded on the principles of the UNCRC, is a progressive legislation that provides a framework for the care, protection, treatment and rehabilitation of children in the purview of the juvenile justice system. It mandates child safeguarding mechanisms in all districts of the state such as the Child Welfare Committees (CWC), Special Juvenile Police Units (SJPU) and Juvenile Justice Boards (JJB) and State/District Child safeguarding Units (DCPU).

**The POCSO** is a landmark legislation, and for the first time a special law to address the issue of sexual violence against children. It seeks to protect all children below the age of 18 from sexual assault, sexual harassment and pornography. These offences are clearly defined for the first time in Indian penal law.

### 3.4. DEFINITIONS

1. **“Best interest of child”** as defined under section 2 (9) of the Juvenile Justice (Care & Protection of Children) Act, 2015 including the primary concern in making decisions and to do what is best for children.
2. **“Child”** is defined in the United Nations Convention on the Rights of the Child (UNCRC) as a person under the age of 18 years. As per section 2 (12) of the Juvenile Justice (Care & Protection of Children) Act, 2015 including the Protection of Children Acts or behaviour that constitute an offence under the Protection of Children from Sexual Offences Act, 2012 and/or the Indian Penal Code, 1860 or any other law from Sexual Offences (POCSO) Act, 2012 also follow this definition of the child.
3. **“Child Abuse”** is defined as any form of physical, emotional or sexual mistreatment or lack of care of a child and includes any actions that results in actual or potential harm to a child as per Section 2 (12) of the Juvenile Justice (Care & Protection of Children) Act 2015. Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Neglect/Negligent Treatment, Sexual Exploitation & Abuse and Exploitation.
4. **“Child Data”** Paper or electronic information containing Personally Identifiable Information (PII) collected for our programmatic or operational purposes. PII is considered confidential and includes sensitive or protected categories, such as health information.
5. **“Child Protection & Child safeguarding”**

**Child protection** is making the world safe for children. It is our programmatic area of work aimed at protecting children from all forms of abuse and exploitation in all regions of the world. Child Protection responses are macro-level in scale and involve holistic approaches to meet the social and legal protection needs of children and their families within vulnerable communities.

**“Child safeguarding”** Child safeguarding within the scope of this policy, is defined as the responsibilities, measures, and activities that the plans to undertake to safeguard children from both intentional and unintentional harm. The set of policies, procedures and practices that we drive to ensure CISSD is a child safe organisation. It involves our collective and individual responsibility and preventive actions to ensure that all children are protected from deliberate or unintentional acts that

lead to the risk of or actual harm by any employee, associates, representatives and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct program implementation, work through partners and management of children's personal data

There are five main types of abuse: physical abuse, sexual abuse, emotional abuse, exploitation and neglect.

- a. **Physical abuse.** Physical abuse occurs when a person purposefully injures or threatens to injure a child. This may for instance, take the form of slapping, hitting, punching, shaking, kicking, beating, burning, shoving or grabbing. Physical abuse can be a single or repeated act. It doesn't always leave visible marks or injuries Giving a child alcohol or inappropriate drugs would also constitute physical child abuse.
  - b. **Sexual Misconduct with a child** - Sexual Misconduct with a Child is any form of sexual activity with a child. It 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 needs of the other person. It may include but is not limited to, contact or non-contact activities, the inducement or coercion of a child to engage in any sexual activity, the use of a child in prostitution or other sexual practices, or exposing a child to online sexual exploitation material, the use of children in pornographic performances and materials, or taking sexual exploitative images of children
  - c. **Sexual abuse** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. POCSO Act defines two forms of sexual abuse–
    - “physical contact” forms of abuse like penetrative sex, fondling of the child’s genitals or making the child touch the offender’s genitals, touching any part of the child’s body with sexual intent, kissing with sexual intent, etc.
    - “non-physical contact” forms of abuse like showing pornographic videos or pictures to the child, using the child in pornographic material, verbal abuse, making lewd gestures to the child, playing sexualized games, stalking the child or chatting with sexual intent with the child over the Internet etc.
  - d. **Emotional abuse** Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence
  - e. **Neglect** Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.
- 6. “Exploitation”** The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery) to engage a child in labour, domestic servitude, forced criminality, soldiering or organ harvesting. Typically, the person(s) exploiting a child does so in order to profit monetarily, socially, or politically. It can happen to one or a group of a children, in the community of origin, outside of the community, or internationally.
- The exploitation of a child may include but is not limited to:
- domestic servitude (e.g., cleaning, childcare, cooking, etc.)
  - forced labour (commonly in factories or agriculture)

- forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise
  - used for benefit fraud
  - forced to become a child soldier or join a gang
  -
7. **“Complainant”** means a person who raises a complaint of child abuse against Respondent who maybe anyone associated with the Organisation in a full-time/part-time capacity as an employee, contractor, client, partner, consultant, vendor, intern, volunteer, or visitor.
8. **“Respondent”** means a person against whom a complaint of child abuse has been made.
9. **“Workplace”** means and includes:
- a. All offices or other premises where the Organisation’s business is conducted or
  - b. All -related activities performed at any other site away from the Organisation’s premises or any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

### 3.5. SCOPE OF THE POLICY

The **Child Safeguarding Policy** applies to everyone working for or associated with CISSD. It encompasses the entire organisation and includes without limitation:

1. **Employees at all levels** – in office, in field or elsewhere.
2. **CISSD Associates** – these include board members, volunteers, community volunteers, donors, consultants, vendors. It also includes employees and/or representatives of partner organisations and local governments who have been brought into contact with children or are party to CISSD child sensitive data while working for or with the organisation
3. **Visitors** – (e.g. donors, journalists, media, researchers, celebrities etc) who may come into contact with children through CISSD are also bound by this policy

The policy applies both during, and outside, normal work hours. Actions taken by CISSD Employees and Related Personnel (CISSD associates and visitors) outside of working hours that are seen to contradict this policy will be seen as a violation of this policy.

### 3.6. PREVENTION OF CHILD ABUSE

Child abuse can be prevented through creation of an environment that is safe, inclusive and respects the rights of children. CISSD strives towards establishing core values through all our institutions, initiatives, and any other facilities. We work towards creating a safe space that allows the growth of children while focusing on developing their talents, catalysing their energy to imbibe the basic values of social living and spiritual and holistic wellbeing.

All initiatives and programs of CISSD will include regular orientations, inductions, and information-sharing sessions so that our employees and related personnel are educated and sensitised in the importance of child safeguarding as a foundational aspect of the culture of each of our initiative or program.

### 3.7. OBLIGATIONS OF THE ORGANISATION

#### Reporting & redressal

CISSD has created a mechanism to effectively deal with cases pertaining to child abuse. For this purpose, a Child safeguarding Committee is created.

The composition of the committee will be as follows:

- Chairperson (Sr Director- HR & OD)
- Child Protection Officer (senior HR representative as nominated or Gender Lead)
- A senior employee member
- An external member well versed in the sphere of child rights & protection (preferably with legal background)

At the time of initiation of proceedings, a quorum of three (3) members is required, it's important that the Chairperson presides over all the proceedings.

The committee will also be responsible for the implementation of this policy.

#### Responsibilities- Management:

- Regular reiteration of child safeguarding by employees as a mandate (quarterly)
- Provide support and resources for creating culture of child safeguarding within the organization
- Work with the heads of program partners organizations and mandate child safeguarding procedures as non-negotiable for all CISSD partners and donors
- Get trained in handling the reporting and management of child abuse within the organization

#### Responsibilities of HR & OD Department:

- All Job advertisement carries the organizations' commitment to Child safeguarding to raise awareness of CISSD's commitment to Child Safeguarding.
- Interview screening and reference checks will have specific question pertaining to the past record in working with children
- All new employees and associates must sign the child safeguarding policy and are inducted on CISSD's Child Safeguarding Policy and Code of Conduct
- Support the program team in taking child safeguarding procedures forward by the implementation team
- Training middle and partner level management in handling reports on child safeguarding
- Train all employees and Associates the child safeguarding policy and guidelines at all forums and periodic townhall meetings
- Conduct periodic refresher trainings for employees, Board and stakeholders

**Responsibilities of employees, consultants, volunteers, and all associates** at CISSD are required to:

- Ensure that the safeguarding and wellbeing of children is CISSD's first priority. This is paramount to all activities and takes precedence over all other considerations.
- Manage situations which could present a risk to the safety and well-being of a child.
- Create a work environment that has zero risk to the safety of children.

- Create an environment that has a zero-tolerance towards any form of abuse towards children.
- Empower the bystander to challenge or question any potentially abusive behaviour, where safe to do so.
- Create an environment where the children feel free to voice their opinions and concerns.
- Empower children by making them aware of their rights and help them build boundaries while engaging with the employees.
- Help the children understand their feelings if something doesn't feel right, teach them to reach out for help.
- Report all concerns that they have about the welfare of a child to the PSHEA Focal point within 24-hours using any of the available mechanisms. This also includes concerns relating to historic incidents of abuse.
- Ensure that they are never alone with a child.
- Never engage in any in any form of sexual relationship with anyone under the age of 18 regardless of age of consent locally. Mistaken belief in the age of the child is not a defence. Understand and abide by CISSD's Child Safeguarding policy in both their professional and personal lives. There are no exceptions to the Child Safeguarding policy.
- Never agree, negotiate or assist in any settlement (financial or otherwise) between the family of survivor of abuse and an alleged perpetrator. Such cases should be reporting in accordance with the reporting procedure immediately.
- Prioritise the safety and wellbeing of children at all times including ensure that all CISSD programmes and activities have been designed with the intention of maximising the safeguarding of children.
- Treat all children with dignity and respect. The must never physically harms a child, including using degrading or humiliating treatment as a form of punishment
- Ensure that data belonging to children is kept safe, ensuring that the gathering of data is done with informed consent from the child and their caregiver. All staff with access to information systems must ensure that their use of such technology does not expose children to risk of harm through the failure to secure sensitive data or the misuse of technology itself (e.g. accessing indecent or inappropriate material)
- Ensure that they respect the privacy of children and do not take photographs of children engaged in CISSD's programme, unless they have the permission to do so as part of their job role and with informed consent of the child and their caregiver.
- Adhere to the CISSD's Child Safeguarding policy at all times.
- Not engage in behaviour that is abusive or puts a child at risk of abuse inclusive of intentionally humiliating, belittling, degrading, holding, kissing, cuddling, touching a child in an inappropriate, unnecessary, or culturally insensitive way.

#### **Responsibilities of Fundraising & Marcom and Advocacy Department:**

- There are specific guidelines for FRMC department to be followed to protect children from harm (intentional or unintentional)

##### **Guideline are for:**

- Relating to media visit to children,
- Interview of children
- Photography or filming of children
- Printing, publishing the images, information of children
- For any media, communications, or advocacy -
  - The parents/guardian's and child's informed consent is a must for any/all of the above
  - The information of the child will not be displayed in a manner that will lead to the identification of the children

- Images and data for the children is protected through passwords to avoid misuse.

**Responsibilities of Program Team:**

- Ensure safety guidelines for child safeguarding for the events that involve children
- Ensure guidelines to protect children during travel and stay for any event and programs
- Ensure employees comply with code of conduct and Child Safeguarding Policy
- Ensure regular orientation of program partners on implementation and adherence of child safeguarding policy and procedures
- Program team monitors the implementation of guidelines
- Conduct regular updates and refresher for the partner employees to implement procedure to keep children safe

**Responsibilities of Support Services:**

- All vendor contracts should have the Child safeguarding policy declaration, as read, understood, accepted, and signed
- Office space will be kept safe and any child/ children visiting the office should be kept safe and without any harm

**3.8. RESPONSE**

This is the mechanism that is adopted if the Child Safeguarding Policy is being violated.

- i. All complaints have to be reported to the focal point person responsible as the CPO. For the organisation, who will be the head of the Child protection task force. Any form of allegation or concerns have to be submitted in writing.

While reporting the complaint following points should be kept in mind: Ensure the child is safe. Where possible, minimize Potential / actual Risks to the child/children without putting themselves at risk of harm,

- ii. After the complaint has been registered. The Child Protection Officer (CPO) works towards safeguarding the child at the first instance. If needed, and with the consent of the child and their caregiver, the child will be removed from any form of danger and to make sure the child is not harassed by means of interrogation.
- iii. The CPO will reach out to the child's guardian or parent. The parents will be given information regarding the complaint. The internal mechanism accessed to address the complaint. The local authorities that have been involved in the case.
- iv. The child will be provided with the appropriate medical/psychiatric assistance depending on the case. The CPO will also keep records of the medical intervention required.
- v. The Child Protection Committee will initiate the investigation to ascertain the report in respect to the facts, opinions. The observations are recorded, and an investigation report is presented.
- vi. The CPC will take appropriate action against the alleged perpetrator. . Based on the decision in the internal inquiry, the CPC assess the appropriate disciplinary outcome that will be implemented.
- vii. All complaints should be written and submitted to the CPO, the complaint should be duly signed and dated.

All internal inquiries should be well documented, and observations should precisely record the minutes of the meeting.

All records of the internal inquiry should be treated as confidential. It is the responsibility of each individual in possession of the information to maintain confidentiality.

viii. Any form of criminal behaviour taking place at a programme, the CPO will assess the risk and inform the appropriate local authorities immediately. The CPO may refer to the following external redressal mechanisms as appropriate:

- **Child Welfare Committee (CWC) of Juvenile Justice Board**
- **Child Helpline**
- **The Department of Women and Child Development**

### 3.9. Dos & Don'ts:

#### DO's

CISSD Employees and Associates will be committed to keeping children safe, hence will-

- Always safeguard children's best interests
- Always be sensitive to variations in children's age, gender, ethnicity, background, sexuality, religion etc.
- Always make sure other adults working with children are carefully selected, trained and supervised, as well as have no criminal record check
- Always take child and child's parents'/guardian's informed consent before involving them in any of activity or event.
- Always make sure that there are appropriate adult chaperones with children
- Always make sure that adults chaperoning children, do so in pairs and where possible with one female, and have a mobile phone with them at all times in case of emergency.

#### DON'T's

- NEVER use offensive language for or in the presence of Children.
- NEVER use any form of physical discipline, harmful or degrading treatment against children
- NEVER make sexual comments towards children
- NEVER engage sexual behaviour towards children
- NEVER be with a child alone.
- NEVER conduct physical activities with children, unless it's a sport type activity
- NEVER spend time alone with a child unless there is an informed decision and objective as agreed with the parents / careers and the responsible employee of CISSD
- NEVER share a room with a child alone overnight
- NEVER have meetings alone with a child at any place unless informed and agreed with the respective designated employee and the parents/guardian of the child.
- NEVER ask the child to serve or do the tasks that are supposed to be done by adults, the employee/Associates
- NEVER take photo of the children in community without their and their parents/guardian's consent
- NEVER take photo of the child when he/she is partially covered or is in any undignified situation or is unaccompanied.
- NEVER hurt a child physically, emotionally, sexually
- NEVER discriminate the child negatively on any ground
- NEVER employ a child or allow children to work on behalf of CISSD
- NEVER force a child to engage in behaviour or activities that could put them at risk
- NEVER exchange in exploitative behaviours towards children including demanding sexual, financial or

personal gain in response for aid or access to services.

**3.10. RISK ASSESSMENT & MITIGATION:**

**Risk assessment for any event will be conducted by the respective team organizing the event with support from HR & OD department & FRMC department**

**Examples of Risk**

Employees or Associate abuses child – in their family, community or through their role

Failing to deal with a child abuse issue we become aware of, in a community.

A child having an accident because we have not taken enough care in organising an activity.

A child abuses another child in CISSD organised events/activities/programs.

Poor procedures and processes lead to child being unintentionally harmed.

**3.11. MODIFICATION AND REVIEW OF THE POLICY**

The management of CISSD reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or otherwise with a view to revising the provisions of this Policy to the extent deemed necessary by the Organisation at least once every three years. Any such changes or modifications will be notified by the Organisation to its employees in due course.

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