



BALA MANDIR KAMARAJ TRUST

CHILD PROTECTION AND SAFEGUARDING POLICY



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AND SAFEGUARDING
POLICY**

TABLE OF CONTENTS:

<u>S.No</u>	Topic	Page No
1.	Introduction and Context	3
2.	Statement of commitment	3
3.	Purpose of the policy	4
4.	Guiding principles	4
5.	Definitions	5
6.	Scope of the policy	5
7.	Code of conduct	5
8.	Communication and use of children's images	5
9.	Appointment of CPO	6
10.	Roles of different units in ensuring child safety	7
11.	Reporting pathway	8
12.	Response protocol	9
13.	Child Protection Response Teams	10
14.	Prevention Measures	11
15.	Monitoring, Evaluation and Review	13
16.	References	14
17.	Annexures	15

INTRODUCTION AND CONTEXT:

Bala Mandir Kamaraj Trust (BMKT) is a registered non-governmental organization with over 75 years of dedicated service to the care, protection, education, and holistic development of children from vulnerable and disadvantaged backgrounds. Our services span multiple units including:

Child Care Institution: for children in need of care and protection under orders of the Child Welfare Committee under the Juvenile Justice (Care and Protection of Children) Act, 2015.

Bala Mandir Schools: offering quality education to children from disadvantaged backgrounds.

Madhuran Narayanan Special Needs Center (MNC): offering therapeutic, educational and life skills support for children with intellectual disabilities.

Kinship Care Program: assisting children raised by single parents or extended caregivers after the loss of one or both parents to COVID or other reasons.

Bala Mandir Research and Resource Center (BMRRC): focusing on outreach, early learning and education, parental engagement and empowerment within the community.

India continues to face high rates of child abuse, neglect, child labor, and early marriage. According to the National Crime Records Bureau 2022 data, thousands of POCSO cases are reported annually, with many more going unreported.

We recognize that, by the very nature of our work, there is potential for our activities, facilities, and relationships to create situations where children could be at risk of abuse, neglect, exploitation or harm, intentional or unintentional.

- a) Residential care places children away from families, creating both opportunities for positive developments and vulnerabilities.
- b) Children with disabilities face higher risks of neglect, abuse, and discrimination.
- c) Community based programs often work with families from disadvantaged backgrounds, where children may face unsafe conditions, violence or other similar issues.
- d) Institutions like schools and creches must actively manage risks of unauthorized access and unsafe adult behavior as well as those of bullying, corporal punishment, or peer exploitation risks.

This Child Protection and Safeguarding Policy is, therefore, a proactive measure, ensuring that every child who comes into contact with Bala Mandir, directly or indirectly, is safe, respected, and protected. It applies across all our programs, units, and partnerships.

This policy operationalizes Bala Mandir's commitment to:

1. Uphold the UN Convention on the Rights of the Child (UNCRC)
2. Comply with the Indian child protection laws including:
 - a) Juvenile Justice (Care and Protection of Children) Act, 2015
 - b) Protection of Children from Sexual Offences (POCSO) Act, 2012
 - c) Child Labor (Prohibition and Regulation) Act, 1996 (amended 2016)
 - d) Information Technology Act, 2000 (with 2008 amendments)
 - e) Tamil Nadu State Child Policy and other related government guidelines.

STATEMENT OF COMMITMENT TO CHILD SAFEGUARDING:

Bala Mandir is committed to-

1. Zero tolerance of any abuse, exploitation, neglect, or harmful practices towards children.
2. Ensuring every child in our programs, regardless of gender, caste, disability, religion, economic background, or family situation is protected.
3. Creating environments that are physically safe (secure facilities, safe play equipment, adequate supervision), emotionally safe (non-discriminatory language and relationships, respectful) and digitally safe (responsible use of technology and online platforms).
4. Taking appropriate and proportionate action in response to any suspicion or allegation of harm.
5. Educating and training all staff and stakeholders on child rights and safeguarding responsibilities under this policy.

PURPOSE OF THE POLICY: This child protection policy aims to:

1. Protect children in Bala Mandir's care and those impacted by our programs from all forms of harm.
2. Establish clear procedures for prevention, early detection, reporting and response to child protection concerns.
3. Ensure compliance with Indian law and international standards.
4. Promote a culture of respect, dignity, and child participation within all units and activities.
5. Set out standards for members, partners, contractors, and visitors to ensure consistent safeguarding practices.

GUIDING PRINCIPLES: Our approach is grounded in:

1. **Best interests of the child:** All our actions will prioritize a child's safety and development.
2. **Non-discrimination:** All children will be granted equal protection regardless of identity or circumstances,
3. **Child participation:** We strongly believe in giving children age-appropriate opportunities to express their views.
4. **Transparency:** Safeguarding measures and decisions will be open to review.
5. **Do no harm:** All our programs will ensure that children are not exposed to any unnecessary risks.
6. **Accountability:** Every Bala Mandir staff is responsible for safeguarding children in their care.
7. **Confidentiality:** We will ensure that confidentiality is maintained when handling reports, balancing it with the obligation to act on the said concerns.

DEFINITIONS:

Child: Any person below the age of 18 years.

Physical Abuse: Hitting, shaking, burning, or causing any other physical harm.

Emotional Abuse: Verbal humiliation, threats, rejection, isolation.

Neglect: Failing to provide adequate food, shelter, supervision, or healthcare.

Sexual Abuse: Any sexual act with a child, including grooming, inappropriate touching, or exploitation.

Exploitation: Using a child for labor services, or benefit in a way that harms their wellbeing.

Bullying: Persistent, intentional harm (physical and emotional) by peers, including cyberbullying.

Child Safeguarding: Proactive steps to ensure children are safe in all interactions.

Duty of Care: Legal and moral responsibility to foresee and prevent harm.

Grooming: Gradual manipulation of child to facilitate abuse, especially sexual abuse.

(Full Glossary- Annexure)

SCOPE OF THE POLICY: This policy applies to:

- a) All Staff (permanent, part-time, contractual)
- b) Volunteers and interns
- c) Trustees, Board members and Committee members
- d) Visitors (donors, auditors, or relevant others)
- e) Contractors, suppliers, and consultants
- f) Partner organizations and their staff when working with Bala Mandir children and/or data.

CODE OF CONDUCT: Key obligations:

1. Maintain professional boundaries and respectful behavior and avoid unobserved one-on-one contact in which ever cases possible.
2. Use age-appropriate, respectful language that upholds dignity always.
3. Never engage in any sexual activity or inappropriate touching with anyone under 18 years.
4. Avoid favoritism, gifts, or special treatment to individual children.
5. Obtain written informed consent for all photographs, videos, or personal stories.
6. Never provide alcohol, drugs, other harmful substances or inappropriate material to children.
7. Report any suspicion or knowledge of abuse immediately to the Child Protection Officer (CPO).

(Full signable code- Annexure)

COMMUNICATION AND USE OF CHILDREN'S IMAGES:

Bala Mandir recognizes that photographs and stories of children are powerful for reporting, advocacy, donor communication, and newsletters. Bala Mandir also recognizes the importance of safeguarding children's dignity and privacy in all forms of communication, publicity, and documentation. Although images, videos, and stories of children can be powerful tools for advocacy and awareness, they must never compromise children's safety, identity, or rights.

Guidelines:

1. **Consent:** Blanket consent will be obtained from parents/guardians at the start of the year (for Schools, Kinship, BMRRRC and MNC). Children old enough to understand will also give assent. Consent must specify the purpose, medium (print, online, social media, reports), and duration of use. Children have the right to refuse or withdraw consent without consequences.
2. **Respect and Dignity:** Children must be portrayed respectfully, fully clothed, and in ways that do not demean, stereotype, or stigmatize them. Images should highlight positive aspects of children's lives, strength, resilience, achievements, rather than focusing only on vulnerability.
3. **Use in Reports/Newsletters:** Photos may be included in donor reports and newsletters. A disclaimer will be added to such documents: *"Images are for internal reporting purposes of Bala Mandir and partner organizations. Reproduction or external circulation without permission is prohibited."*
4. **Privacy and Protection:** Images must not reveal identifying details such as full names, addresses, school names, or geotags that could compromise safety. Group photographs should be preferred over individual close-ups when used for external communications. Sensitive cases (e.g., survivors of abuse, children with disabilities, children in CCIs) must never be identifiable in public platforms.
5. **Anonymity:** In external/publicly available reports (annual reports, websites, social media), real names will not be used. Pseudonyms or initials will be used across all units, particularly for children from CCIs and MNC.
6. **Representation:** Children will be portrayed respectfully and positively, avoiding stereotypes or stigmatization.
7. **Restrictions:** No child will be photographed in situations that compromise dignity (e.g., medical, disciplinary, or vulnerable settings). Staff/volunteers are prohibited from using personal devices for photography unless authorized. Staff and volunteers are also prohibited from sharing children's photos/videos on personal devices, social media, or with unauthorized persons.
8. **Responsible Use:** Images and stories may be used only for organizational purposes aligned with Bala Mandir's mission.
9. **Monitoring and Accountability:** The Unit Heads must approve all materials prior to publication which will then be checked by the CPO.

Any violation will be treated as misconduct and dealt with under disciplinary procedures.

APPOINTMENT OF CHILD PROTECTION OFFICER (CPO)

To ensure that child safeguarding remains a central and consistent priority across Bala Mandir, the organization shall appoint a Child Protection Officer (CPO) at the institutional level. The CPO will be a senior staff member nominated by the Executive Committee (EC) and formally endorsed through a written appointment order. The position is critical, as it provides a single point of accountability for all child protection matters across the different units, i.e., BM Children's Home, BM Schools, BM Madhuram Narayanan Centre, BM Kinship Care Programme, and BMRRC.

The CPO should possess professional experience in social work, child rights and welfare, criminology, psychology, or education, and must demonstrate sensitivity to children's needs and rights. Mandatory training in child protection laws such as the POCSO Act, Juvenile Justice Act, and institutional care guidelines will be required. Additional exposure to counselling, trauma-informed care, and working with children with special needs will be an advantage.

The CPO will function with independence and authority, reporting directly to the Honorary General Secretary of the organization. The role includes developing, implementing, and periodically reviewing the Child Protection Policy, maintaining confidential case records, ensuring training for all staff and volunteers, and acting as the first point of contact for any concern relating to a child's safety. The CPO is empowered to take immediate action to safeguard children, including recommending suspension of staff or volunteers pending inquiry, and is responsible for mandatory reporting to statutory authorities such as the Child Welfare Committee (CWC) or police.

The CPO will also conduct annual child protection risk assessment across all units, provide quarterly compliance reports to the EC, and coordinate with external child protection agencies when required. In doing so, the CPO ensures that Bala Mandir remains a safe, child-friendly, and rights-based organization.

ROLES OF DIFFERENT UNITS IN ENSURING SAFETY:

Child protection at Bala Mandir is a shared responsibility, and each functional unit plays a vital role in maintaining a safe and supportive environment.

Children's Homes (CCI - Chennai & Nagercoil): Staff must ensure strict adherence to child safeguarding practices in residential care. Caregivers will undergo police verification and training, maintain child-friendly spaces, monitor visitor interactions, and ensure privacy and dignity in daily routines such as bathing, dressing, or medical care. Each child must have access to at least one trusted adult within the home who they can confide in if they feel unsafe.

Schools (KG to Higher Secondary, including Creche): Teachers and staff are expected to integrate child protection into classroom practices. This includes teaching children about safe boundaries, setting up mechanisms such as suggestion boxes for anonymous reporting, and creating a non-discriminatory environment. Teachers should also be alert to behavioural or academic changes that may indicate distress.

Madhuram Narayanan Centre (MNC): Given its focus on children with intellectual disabilities, staff must be especially vigilant. Teachers and therapists must ensure that

individual sessions/ therapy sessions are always conducted transparently, with parental or supervisory presence. Non-verbal signs of discomfort or distress should be documented and flagged.

Kinship Care Programme: Social workers must ensure that children living with surviving parent or kin are regularly monitored through home visits and safe communication channels. Families should be oriented on child rights, while children should know how to report concerns.

Bala Mandir Research & Resource Centre (BMRRC): Research and training activities must incorporate child protection protocols such as informed consent, confidentiality, and ethical data handling. Staff should model best practices when interacting with the community. They should also follow the child protection practices when interacting with the children in the community.

Together, these roles form a protective ecosystem, ensuring that every child, regardless of unit, experiences safety, dignity, and trust.

Administrative Team: Although HR and Finance/Admin teams do not engage directly with children, they hold key responsibilities for ensuring that only safe, qualified, and vetted individuals are employed or associated with Bala Mandir, and that all institutional systems uphold the principles of child protection.

Key Responsibilities:

1. **Safe Recruitment and Screening:** The department should conduct police verification and reference checks for all staff, interns, volunteers, and consultants before engagement. They should also include child protection responsibilities in all job descriptions and contracts. They must ensure that all new hires sign the Code of Conduct and receive an orientation on the Child Protection Policy.
2. **Intern and Volunteer Management:** With respect to internships, the team must maintain a database of interns and volunteers, with verified identity, references, and assigned supervisors. They should also ensure that the interns are never left alone with children and always work under the supervision of trained staff. The interns must also be provided with a short induction on boundaries, confidentiality, and reporting procedures.
3. **Finance and Vendor Oversight:** The team must ensure that vendors or contractors (transport, housekeeping, or other relevant vendors) whose staff may interact with children are informed of Bala Mandir's safeguarding standards and screened appropriately. They should also include a child protection compliance clause in all vendor contracts.
4. **Confidentiality and Record Management:** The team must maintain secure records of staff files, background checks, training attendance, and Code of Conduct forms. The team must also protect the confidentiality of any child-related information handled during administrative or financial processes.
5. **Support to CPO and Steering Committee:** The team must provide HR and administrative data as required to the CPO and steering committee for internal audits, compliance reports, and annual reviews of safeguarding practices.

REPORTING PATHWAY

Adult Reporting on Behalf of a Child

Step 1: Immediate Reporting

- Any **adult associated with Bala Mandir** (teacher, caregiver, staff, volunteer, external partner, community member) who suspects or becomes aware of child abuse or neglect must immediately report the concern to the Unit Head (Principal/Warden/Member) or Counsellor/Social Worker within 24 hours.
- If the concern is urgent (e.g., child in immediate danger), the adult must directly inform the Child Protection Officer (CPO) and the Head of Institution without delay.

Step 2: Documentation

- The reporting adult must complete the Incident Reporting Form (**Annexure**) with as much detail as possible:
 - Name, age, and details of the child (if known).
 - Nature of concern (physical signs, behavioural changes, disclosure, observed incident, etc.).
 - Date, time, and place of the incident or observation.
 - Names of people involved (if known).
 - The form should be submitted to the Counsellor/Unit Head/CPO.
- If the adult is unable to write, verbal reporting will be accepted and documented by the receiving staff.

Step 3: Initial Response by Counsellor/Unit Head

- The Counsellor/Unit Head will:
 - Speak with the adult reporter to clarify facts.
 - Avoid probing the child directly unless necessary (to prevent repeated questioning).
 - Record information factually and confidentially.
- If serious abuse is suspected, the case will be immediately escalated to the CPO.

Step 4: CPO and Response Team Action

The CPO will convene the Response Team (Head of Unit, Counsellor, and other relevant staff). The Response Team will decide whether the case falls under:

1. Minor Concern (to be handled internally with support, counselling, family engagement).
2. Serious Concern (physical/sexual abuse, severe neglect) requiring Mandatory Reporting to CWC/DCPU/Police.

Step 5: Follow-up and Protection

- The child will be provided immediate emotional and physical support. The adult reporter will be kept informed (to the extent appropriate) about the action taken.
- Confidentiality will be strictly maintained, the adult must not independently investigate or confront the suspected perpetrator, neither should he/she talk to anyone about this incident. This should not be a subject of talk anywhere within the organization.

RESPONSE PROTOCOL:

Clear reporting mechanisms are critical to child protection at Bala Mandir. Every staff member, volunteer, or partner is a mandatory reporter and must immediately share any concern or suspicion of abuse with the Child Protection Officer (CPO) or designated unit focal person. The general steps of reporting

Step 1: Receipt of Concern: Reports may come directly from a child, through observation, or from another adult. Concerns must be documented immediately using the standard Incident Reporting Form.

Step 2: Initial Assessment: The CPO will assess the concern within 24 hours, identifying whether the case presents immediate risk. If urgent, interim protective measures must be taken, such as removing the alleged perpetrator from child contact.

Step 3: Interim Action: Child safety takes priority. This may involve medical attention, counselling, temporary relocation within the home, or increased supervision.

Step 4: Formal Investigation: The CPO, with support from the HGS office, will initiate an internal inquiry or escalate to external agencies. All cases of sexual abuse, severe neglect, or violence must be mandatorily reported to the Child Welfare Committee (CWC) or police, in compliance with the POCSO Act and Juvenile Justice Act.

Step 5: Documentation and Reporting: Each step will be recorded in the confidential case registry maintained by the CPO. Updates will be shared with the EC members on a need to know basis.

Step 6: Support and Rehabilitation: The affected child will be offered trauma-informed counselling, legal aid if necessary, and follow up care.

Step 7: Closure and Learning: Each case ends with a debrief, learning review, and policy update if required.

This structured process ensures both child safety and accountability, while reinforcing Bala Mandir's zero tolerance approach to abuse.

CHILD PROTECTION RESPONSE TEAMS (CPRTs) AT BALA MANDIR

Each Bala Mandir unit will have its own **Child Protection Response Team (CPRT)** to ensure that any reported concern of abuse or neglect is addressed promptly and appropriately. These

teams will work under the guidance of the Child Protection Officer (CPO) and will coordinate with statutory authorities (CWC, DCPU, Police) when necessary.

1. Children's Home

Composition:

- Unit Head / Superintendent/ Member
- Residential Social Worker / Counsellor
- House Mother / Senior Caregiver
- Nurse / Health Worker
- Teacher representative (for academic input)

Role:

- Immediate safety and care of the child.
- Supportive counselling and emotional first aid.
- Documentation of the incident.
- Decide on medical examination or referral.
- Escalate to CPO for further reporting.

2. Education (SMHS, Vidyalaya, Creche)

Composition:

- Principal / Head of School
- School Counsellor / Psychologist
- Teacher representative
- Administrator (as required)

Role:

- Provide immediate safety within the school premises.
- Interview staff/teachers and gather background info.
- Ensure academic and emotional support for the child.
- Convene parent meetings where appropriate.
- Escalate to CPO in serious cases.

3. MNC Unit (for Intellectual and Developmental Disabilities – IDD)

Composition:

- Unit Head
- Special Educator / Therapist
- Social Worker
- Nurse / Health Worker
- Parent representative

Role:

- Pay special attention to non-verbal cues and behavioural changes.
- Ensure sensitive handling of children with IDD.
- Provide immediate therapeutic and medical support.
- Escalate promptly to CPO in case of suspected abuse.

4. BMRRC (Research & Resource Centre)**Composition:**

- Unit Head
- Research Staff
- Social Worker / Child Psychologist
- Administrative staff

Role:

- Ensure ethical handling of children in research/fieldwork.
- Monitor adherence to consent and safeguarding guidelines.
- Escalate research-related child protection concerns to CPO.

5. BM Kinship Care**Composition:**

- Unit Head / Coordinator
- Social Worker
- Counsellor (part-time/visiting)
- Representative mother (trained)

Role:

- Verify concern raised by kinship caregiver or community member.
- Conduct safe home visits and family meetings.
- Link family to external mental health or legal support.
- Escalate serious concerns to CPO & statutory authorities.

General Protocol for All Teams:

- Meet within 24-48 hours of receiving a report.
- Ensure the child's safety and confidentiality immediately.
- Document all actions factually using the Incident Reporting Form.
- Provide emotional and physical support to the child.
- Refer cases to CPO for decision on external reporting.
- Review cases periodically until closure.

PREVENTION MEASURES:

Bala Mandir emphasizes prevention as the most effective safeguard. Preventive measures are structured into clear steps and actions to ensure consistent practice across all units.

Step 1: Recruitment and Screening

1. All prospective employees, volunteers, consultants, and interns must undergo:
 - Police Verification (mandatory for child facing roles).
 - Reference Checks with at least two previous employers/associates.
 - Signing of a Child Protection Declaration and Code of Conduct.
2. No individual may begin child-facing work until clearance is received.
3. Real time vendors (drivers, cleaners, contractors) must also be screened and oriented.

Step 2: Orientation and Training

1. Every staff member and volunteer will receive a child protection induction upon joining.
2. Annual refresher workshops will cover:
 - Child rights and laws (POCSO, JJ Act, adoption guidelines).
 - Recognizing physical, emotional, and behavioural signs of abuse.
 - Safe interaction guidelines (boundaries, supervision, consent).
3. Specialized training will be conducted for:
 - Residential care staff.
 - Teachers and school counsellors.
 - Teachers and therapists working with children with special needs.

Step 3: Empowering Children

1. Regular sessions for children (age-appropriate) on:
 - Safe/unsafe touch.
 - Saying “No” and seeking help.
 - Understanding their rights.
2. Mechanisms such as trusted persons lists, child-friendly posters, suggestion/complaint boxes, helpline numbers (Childline 1098) will be displayed.
3. For children with communication barriers (MNC), use visual aids, symbols, and simplified communication boards.

Step 4: Creating a Safe Environment

1. **Physical infrastructure** will be designed for safety:
 - Adequate lighting in corridors, dormitories, and outdoor areas.
 - Separate and gender-sensitive sanitation facilities.
 - Secure gates and regulated visitor access.
2. **Supervision Protocols:**
 - Minimum two adults present during outings.
 - One-on-one sessions (counselling/therapy) to follow open door policy
 - Strict monitoring of online/virtual interactions (in Children's Home, Schools, and Kinship Care program if possible).

Step 5: Building Partnerships and Community Awareness

1. Tie-ups with local police, Childline, CWCs, DCPUs, hospitals, and NGOs.
2. Conduct awareness sessions for parents/guardians (across all units where applicable).
3. Establish MoUs with mental health professionals for referral support.

MONITORING, EVALUATION AND REVIEW:

Bala Mandir recognises that a Child Protection Policy must not remain a document alone but be actively monitored, evaluated, and periodically reviewed to ensure effectiveness. Monitoring ensures compliance in day to day functioning, evaluation helps assess whether safeguarding objectives are being met, and review ensures that the policy evolves in line with emerging risks, legal requirements, and organizational learning.

Monitoring

Audit Team

- **Internal Audit:** An *Internal Audit* of safeguarding practices will be conducted once a year. The audit will check compliance with prevention, reporting, documentation, and communication protocols. Findings will be presented to the Central Steering Committee and the EC.
- **Unit-Level Monitoring:** Each unit head (Children's Home, Schools, MNC, Kinship, BMRRC) will be responsible for ensuring adherence to child protection standards daily. They will maintain records of staff training, visitor registers (if applicable), and incident reports.
- **CPO Oversight:** The Child Protection Officer (CPO) will conduct half yearly monitoring visits to each unit. This will include reviewing records, interviewing staff and children, and verifying compliance with safety protocols.
- **Tools:** Monitoring will use standard checklists covering staffing, supervision, infrastructure safety, awareness activities, and reporting mechanisms.

Evaluation

- **Annual Safeguarding Audit:** Led by the CPO, an audit will assess whether prevention and response measures have reduced risks and improved child safety. Indicators include number of trainings completed, reported incidents and their resolution, children's feedback on safety, and external agency coordination.
- **Child Feedback Mechanisms:** Anonymous surveys, focus group discussions, and one on one conversations will be used to capture children's views on feeling safe within Bala Mandir.
- **External Evaluation:** Every three years, Bala Mandir will commission an independent external evaluation of its child protection systems to ensure objectivity and credibility.

Review

- **Policy Review Cycle:** The Child Protection Policy will be reviewed once every two years, or earlier if triggered by a major incident, legislative change, or recommendation from authorities.
- **Review Process:** The CPO will draft revisions based on monitoring data, audit findings, and stakeholder feedback. The Executive Committee will approve changes after consultation with relevant people.
- **Continuous Improvement:** Lessons learned from cases will be integrated into revised training, procedures, and preventive measures.

Steering Committee

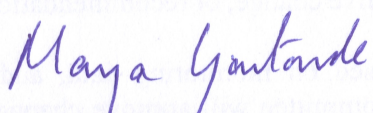
- **Central Child Protection Steering Committee:** There will be a Central Child Protection Steering Committee consisting of CPO and management level key members, that will meet every 6 months. This committee will review unit reports, audits, and training adherence.
- **Unit-level Committees:** Each unit also has a Child Protection Response Team. This team will meet quarterly and submit a brief report to the central committee.
- **Support to CPO:** The central committee will act as a support and oversight mechanism for the CPO, ensuring resources and follow-up.

Action in Cases Where a Person is Found Guilty of Child Abuse

If any staff member, volunteer, consultant, or individual associated with Bala Mandir is found guilty of child abuse or a violation of this policy, whether through internal inquiry or by statutory authorities, strict disciplinary and legal action will be taken without exception. Such action may include immediate suspension or termination of employment/association, removal from all child-related responsibilities, and mandatory reporting to law enforcement or the Child Welfare Committee (CWC) as required under the *POCSO Act (2012)* and *Juvenile Justice Act (2015)*. In addition to legal proceedings, Bala Mandir will ensure that the affected child receives psychosocial support, counselling, and protection from retaliation. Any individual found to have failed to report, concealed, or neglected to act upon knowledge of abuse will also be subject to disciplinary measures. Bala Mandir maintains a zero-tolerance policy towards child abuse in any form, physical, emotional, sexual, neglect, or exploitation, and will act decisively to protect the safety, dignity, and rights of every child under its care.

REFERENCES: This policy has taken references and standards of care from the following documents:

1. ACFID Code of Conduct Guidelines for the Development of Child Safeguarding Policy.
2. Child Protection Policy, NEEDS.
3. Child Protection Policy, ARPAN
4. Child Protection Policy, PODDAR
5. Child Protection Policy, OXFAM


Maya Gaitonde

Honorary General Secretary

Bala Mandir Kamaraj Trust

ANNEXURE

Annexure I: Child Protection Code of Conduct for Staff and Volunteers

This Code of Conduct applies to all staff, volunteers, interns, contractors, and visitors at Bala Mandir across its units (Children's Homes, Schools, Madhuram Narayanan Centre, BMRRC, and Kinship Care Programme). It is designed to ensure respectful, safe, and child-centred interactions.

A. Do's (Expected Behaviour)

1. Respect and Care

- Treat every child with dignity, fairness, and kindness, irrespective of gender, age, caste, religion, ability, or background.
- Use positive language, encouragement, and constructive feedback.

2. Professional Boundaries

- Maintain appropriate adult-child boundaries at all times.
- Ensure one-on-one interactions occur in open, visible spaces or in rooms following open door policy.

3. Safety First

- Always act in the best interests of the child.
- Immediately report any suspicion or disclosure of abuse to the CPO or Unit Head.
- Intervene if a child is at risk of harm.

4. Transparency

- Keep records of incidents, absences, or unusual behaviour for further monitoring and follow-up (anything that you find suddenly changed or odd or suspicious or unlike the child).
- Seek parental/guardian consent for participation in events, therapy, or trips.

5. Digital Safety

- Use only official Bala Mandir platforms for virtual interactions.
- Ensure online sessions are supervised, child-safe, and time-limited.

B. Don'ts (Prohibited Behaviour)

1. Physical Contact

- Do not hit, shake, or physically punish a child.
- Do not engage in inappropriate touching, hugging, or holding children in ways that could be misinterpreted.

2. Verbal and Emotional Harm

- Do not use abusive, threatening, or humiliating language.
- Do not discriminate, mock, or shame children.

3. Sexual Misconduct

- Strictly prohibited from any form of sexual behaviour, innuendo, or exploitation.
- Do not share sexually explicit materials or discussions with children.

4. Private Interactions

- Do not spend time alone with a child in isolated or unsupervised spaces unless it is a part of counselling, therapy or social work session conducted under organizational policy guidelines. Maintain open door policy to the extent possible.
- Do not transport children alone in personal vehicles without prior approval and written consent.

5. Digital Misuse

- Do not share personal phone numbers, social media, or private messages with children.
- Do not take photographs, audio, or video recordings of children without prior consent (parent/guardian and organization).

6. Conflict of Interest

- Do not accept gifts, money, or favours from children or families.
- Do not involve children in personal, religious, or political activities.
- Staff should not use children for running their personal errands such as washing their clothes, buying food from outside, washing their utensils etc for example.

C. Accountability

- Breach of this Code of Conduct will lead to disciplinary action, which may include removal from duty, termination from employment, closure of contract, and/or legal or other disciplinary action in line with the **POCSO Act** and **Juvenile Justice Act**.
- All staff and volunteers must sign this Code of Conduct before commencing work at Bala Mandir.

Signed: _____

Name & Designation: _____

Date: _____

Annexure II: Key Definitions

- **Child:** Any person below the age of 18 years, as per the United Nations Convention on the Rights of the Child (UNCRC) and Juvenile Justice Act, 2015.
- **Child Rights:** Derived from UNCRC, this includes a child's right to survival, protection, participation and development.
- **Child Protection:** Measures and structures designed to prevent and respond to abuse, neglect, exploitation, and violence against children.
- **Child Safeguarding:** Broader than protection, this means ensuring that all organizational operations, programs, staff, and practices do no harm to children, and actively promote their well-being.
- **Best Interest of the Child:** A guiding principle that all actions concerning children must prioritize their health, safety, development and dignity above all else.
- **Abuse:** Includes physical abuse, emotional abuse, sexual abuse, neglect, and exploitation.
- **Physical Abuse:** Infliction of physical injury such as hitting, shaking, burning, or poisoning.
- **Emotional Abuse:** Persistent emotional maltreatment such as rejection, humiliation, bullying, or threats.
- **Sexual Abuse:** Involvement of a child in sexual activity, including inappropriate touching, exposure to pornography, or exploitation.
- **Neglect:** Failure to provide for a child's basic physical, emotional, educational, or medical needs.
- **Exploitation:** Using a child for labour, servitude, trafficking, or profit-making activities.
- **Corporal Punishment:** Any punishment involving physical force intended to cause pain or humiliation.
- **Child Protection Officer:** Is the designated lead for handling child protection concerns.
- **Mandatory Reporter:** Any Bala Mandir staff, volunteer, or associate who is legally and ethically required to report suspected abuse.
- **Confidentiality:** Ensuring that children's information and case details are handled sensitively, shared only with authorised persons and protected from misuse.
- **CWC:** Child Welfare Committee – statutory body under the Juvenile Justice Act responsible for child protection cases.
- **DCPU:** District Child Protection Unit – government body coordinating child protection at the district level.

Annexure III: Identifying Signs and Symptoms of Child Abuse

Abuse may be **physical, emotional, sexual, or neglect**. Children may not always disclose abuse directly, but there are often warning signs in their behaviour, physical condition, or emotional state.

1. Physical Abuse

Definition: Infliction of physical injury through hitting, beating, burning, shaking, or other forms of harm.

Possible Signs:

- Unexplained bruises, burns, bite marks, welts, or fractures.
- Injuries in unusual patterns or shapes (belt marks, handprints, etc.).
- Frequent injuries explained as “accidents” with inconsistent stories.
- Fear of going home or being with a particular adult.
- Flinching when approached, shrinking at sudden movements.
- Wearing inappropriate clothing (long sleeves in hot weather) to cover injuries.

2. Emotional Abuse

Definition: Persistent emotional maltreatment that harms a child’s sense of worth and well-being.

Possible Signs:

- Extreme withdrawal, fearfulness, or anxiety.
- Excessive crying, sadness, or sudden loss of self-confidence.
- Aggressive or destructive behaviour (towards self, peers, or property).
- Developmental delays without medical reason (speech, growth, learning).
- Overly compliant, passive, or “frozen” behaviour.
- Frequent psychosomatic complaints (headaches, stomach aches) with no clear cause.

3. Sexual Abuse

Definition: Forcing or enticing a child into sexual activities, including inappropriate touching, exposure, or exploitation.

Possible Signs:

- Difficulty walking or sitting, genital pain, itching, or bruising.
- Bloodstains or torn clothing, especially underwear.
- Knowledge of sexual behaviour inappropriate for age.
- Sudden behavioural changes: aggression, withdrawal, sleep disturbances, nightmares.
- Fear of a specific person or refusal to be left alone with them.
- Running away from home or care setting.
- Sexualized drawings, play, or language not typical for age.

4. Neglect

Definition: Persistent failure to meet a child's basic physical, emotional, medical, or educational needs.

Possible Signs:

- Poor hygiene, body odour, untreated medical or dental issues.
- Consistently dirty or inappropriate clothing (torn, unwashed, no warm clothes in winter).
- Malnutrition, constant hunger, stealing food.
- Frequent school absences or chronic lateness.
- Lack of supervision (left alone or with inappropriate caregivers).
- Developmental delays due to lack of stimulation and nurturing.

5. Other Forms (Bullying & Exploitation)

- **Bullying:** Unexplained injuries, loss of personal belongings, reluctance to go to school, fear of peers.
- **Labour/Exploitation:** Fatigue, missing school for work, injuries consistent with labour tasks, knowledge of adult responsibilities beyond age.
- **Trafficking:** Frequent relocations, no control over identity documents, scripted responses, visible fear of “guardian” or “employer.”

Annexure IV: Recruitment Checklist

For every new hire/volunteer/intern:

1. Application form completed and signed.
2. Updated CV submitted.
3. Two professional reference checks completed (documented).
4. Police verification certificate submitted.
5. Signed Child Protection Declaration and Code of Conduct.
6. Orientation session on Child Protection attended.
7. Inclusion in the staff training log.

No staff or volunteer to be deployed with children until all steps are completed.

Annexure V: Incident Reporting Form

Date & Time of Report:

Name of Reporter:

Role/Designation:

Unit (CCI/School/MNC/Kinship/BMRRC):

Child's Name (if known):

Age & Gender:

Nature of Concern: (Tick relevant)

☐ Physical Abuse ☐ Sexual Abuse ☐ Emotional Abuse ☐ Neglect ☐ Bullying ☐ Other

Details of Incident (what happened, when, where, who was involved):

Immediate Action Taken:

Reported To (CPO/Unit Head/Police/CWC):

Signature of Reporter:

Signature of CPO:

Annexure VI: Consent Forms

E.1 General Consent (For Schools/Outreach Activities):

I, _____, parent/guardian of _____ (child's name), consent to their participation in the activities conducted by Bala Mandir. I understand that all activities will be carried out under supervision and safety protocols.

Signature: _____ Date: _____

E.2 Therapy/One-on-One Sessions (MNC):

I, _____, consent to my child _____ receiving therapy sessions at Madhura Narayanan Centre. I understand that all sessions will follow Bala Mandir's safeguarding policies.

Signature: _____ Date: _____

E.3 Media/Photography:

I, _____, consent / do not consent (circle) to my child _____ being photographed or filmed for Bala Mandir's educational and awareness purposes.

Signature: _____ Date: _____

Annexure VII: Contact Directory

Child Protection Officer (CPO):

Name:

Phone:

Email:

Local Authorities – Chennai

- Childline 1098
- Child Welfare Committee (CWC) Chennai: Phone:
- All Women Police Station, **T Nagar??**: Phone:
- District Child Protection Unit (DCPU) Chennai: Phone:

Local Authorities – Nagercoil

- Childline 1098
- Child Welfare Committee (CWC) Nagercoil: Phone:
- Police Helpline: 100
- DCPU: Phone:

Other Contacts (for referral):

- Govt. Children's Hospital, Chennai: Phone: ____
- Mental Health Professional Panel: (List with contacts)