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MANGROVE FOUNDATION OF INDIA

CHILD PROTECTION & SAFEGUARDING POLICY

Policy No.	MFI/POL/002
Version	1.0
Effective Date	10/08/2024
Approved By	Board of Trustees / Governing Body
Review Frequency	As per the requirement
Policy Owner	Child Protection/Safeguarding Focal Point

1. Purpose

Mangrove Foundation of India is committed to protecting every child who comes into contact with its employees, volunteers, consultants, partners, programmes or activities.

MFI's work includes environmental education, Child Resource Centres, school/youth engagement and community programmes. Its website specifically describes child-focused activities designed to create safe and child-friendly learning and recreational environments.

The purpose of this policy is to:

- Protect children from abuse, exploitation, neglect and harm.
- Establish minimum safeguarding standards.
- Prevent inappropriate behaviour by staff and representatives.
- Establish safe recruitment procedures.
- Establish reporting and response mechanisms.
- Define responsibilities for safeguarding.
- Promote child participation while respecting safety and dignity.
- Ensure compliance with applicable Indian child-protection laws.

2. Scope

This policy applies to:

- Employees.
- Trustees.
- Volunteers.
- Interns.
- Consultants.
- Contractors.
- Trainers.
- Visitors.
- Partner organisations.
- Vendors/service providers working directly with children.
- Photographers/media representatives.
- Any person representing MFI.

It applies to:

- Offices.
- Schools.
- Child Resource Centres.
- Project sites.
- Villages.
- Field visits.
- Training programmes.
- Events.
- Online activities.
- Digital communications.
- Social media.
- Travel involving children.

3. Definition of a Child

For purposes of this policy, a child means a person below 18 years of age, consistent with India's child-protection framework.

NCPCR identifies the POCSO Act, Juvenile Justice Act and RTE Act among the key laws concerning children.

4. Policy Statement

> **MFI has zero tolerance for child abuse, exploitation and sexual misconduct.**

Every child has the right to:

- Safety.

- Dignity.
- Respect.
- Privacy.
- Participation.
- Non-discrimination.
- Protection from violence and exploitation.

The child's best interests shall guide decisions affecting children.

5. Types of Harm Covered

The policy covers:

5.1 Physical Abuse

Any act causing or likely to cause physical injury or suffering.

5.2 Sexual Abuse

Any sexual act, sexual exploitation, grooming, inappropriate touching, sexual communication, exposure or other conduct prohibited by law.

5.3 Emotional/Psychological Abuse

Including:

- Humiliation.
- Threats.
- Intimidation.
- Harassment.
- Persistent verbal abuse.
- Discrimination.
- Deliberate isolation.

5.4 Neglect

Failure to provide reasonable protection, supervision or care where an organisational duty exists.

5.5 Exploitation

Including:

- Child labour.
- Commercial exploitation.
- Trafficking.
- Financial exploitation.
- Sexual exploitation.

5.6 Online Abuse

Including:

- Sexual communication.
- Grooming.
- Sharing inappropriate material.

- Unauthorised use of children's images.
- Cyberbullying.
- Contact through personal accounts for inappropriate purposes.

6. Applicable Legal Framework

MFI shall comply with applicable Indian laws and regulations, including, as relevant:

- Protection of Children from Sexual Offences Act, 2012 (POCSO).
- Protection of Children from Sexual Offences Rules, 2020.
- Juvenile Justice (Care and Protection of Children) Act, 2015.
- Right of Children to Free and Compulsory Education Act, 2009.
- Applicable child labour legislation.
- Applicable criminal law.
- Applicable data/privacy requirements.

NCPCR maintains official resources covering POCSO and its Rules and guidance relating to child protection.

> **Important:** The final policy should be reviewed by an Indian child-protection/legal professional before Board adoption, particularly the reporting provisions.

7. Safeguarding Principles

MFI shall follow:

- Best interests of the child.
- Do no harm.
- Zero tolerance for abuse.
- Non-discrimination.
- Confidentiality.
- Accountability.
- Child participation.
- Prompt reporting.
- Appropriate referral.
- Survivor/child-centred response.

8. Code of Conduct

All MFI representatives shall:

- Treat children respectfully.
- Use appropriate language.
- Maintain professional boundaries.
- Avoid humiliating or threatening children.
- Obtain required consent before photographs/videos.

- Avoid unnecessary one-to-one situations.
- Report safeguarding concerns immediately.
- Follow approved communication channels.

9. Prohibited Conduct

Personnel must never:

- Hit or physically punish a child.
- Engage in sexual activity or sexualised behaviour with a child.
- Make sexual comments to children.
- Groom children.
- Show sexually explicit material to children.
- Ask children for sexualised photographs.
- Engage in inappropriate touching.
- Sleep in the same bed as a child.
- Consume alcohol/drugs while responsible for children.
- Meet a child privately for non-programme purposes.
- Communicate secretly with children.
- Invite children to their private residence without appropriate authorisation.
- Use children for personal financial benefit.
- Use threats or humiliation as discipline.
- Post identifying information about children without authorisation.

10. One-to-One Interaction

Wherever possible, interactions between adults and children should occur:

- In visible areas.
- Within programme premises.
- With appropriate supervision.
- With another responsible adult nearby.

Exceptions should only occur where necessary for the child's safety or wellbeing and should be documented appropriately.

11. Safe Recruitment

MFI shall incorporate safeguarding into recruitment.

Depending on the role, procedures may include:

- Application screening.
- Identity verification.
- Reference checks.
- Employment history checks.

- Declaration regarding suitability to work with children.
- Police/background verification where legally appropriate.
- Safeguarding interview questions.
- Signed Code of Conduct.

No person should be appointed to a child-facing role without appropriate safeguarding checks.

12. Safeguarding Induction

All staff, volunteers and relevant partners must receive safeguarding orientation.

Training should cover:

- Child rights.
- Types of abuse.
- Recognising signs of abuse.
- Code of Conduct.
- Reporting procedures.
- POCSO awareness.
- Online safety.
- Photography and consent.
- Appropriate communication.
- Confidentiality.

Refresher training should be conducted periodically.

13. Reporting a Concern

Anyone who:

- Witnesses abuse.
- Receives an allegation.
- Suspects abuse.
- Receives a disclosure from a child.

must report the concern through MFI's safeguarding mechanism.

> **A concern should not be ignored simply because there is uncertainty.**

14. Child Disclosure

If a child discloses abuse, the person receiving the disclosure should:

- Remain calm.
- Listen.
- Take the child seriously.
- Avoid blaming the child.
- Avoid making promises of absolute secrecy.
- Avoid leading questions.

- Record the facts accurately.
- Immediately inform the designated safeguarding authority.
- Take urgent action if the child is in immediate danger.

The person should not conduct their own investigation.

15. Designated Child Protection Officer

MFI should appoint a **Child Protection Officer / Safeguarding Focal Point (CPO/SFP)**.

The officer should:

- Receive safeguarding concerns.
- Maintain confidential records.
- Coordinate appropriate referrals.
- Ensure safeguarding training.
- Monitor implementation.
- Maintain incident registers.
- Report significant matters to senior management/Board as appropriate.
- Ensure legal reporting requirements are followed.

MFI should maintain a backup safeguarding focal point to ensure continuity.

17. Confidentiality

Information concerning safeguarding cases shall be shared only on a strict need-to-know basis.

MFI shall protect:

- Child identity.
- Family information.
- Medical information.
- Allegation details.
- Investigation information.

Confidentiality must not prevent legally required reporting.

18. No Retaliation

No person shall face retaliation for making a genuine safeguarding report.

Retaliation, intimidation or victimisation of a complainant, child or witness shall be treated seriously.

19. Allegations Against Staff

Where an allegation concerns an employee, volunteer, consultant or representative:

- The concern shall be documented.
- Immediate safety measures shall be considered.
- Appropriate authorities shall be informed where required.

- The alleged person may be removed from child-facing duties pending appropriate review.
- MFI shall not conduct an internal process that interferes with a statutory investigation.

An allegation shall be handled fairly while prioritising child safety.

20. Photography and Videography

MFI shall establish strict rules regarding children's images.

Before taking/using photographs or videos:

- Obtain appropriate consent/permission.
- Explain the purpose.
- Avoid degrading or exploitative imagery.
- Avoid unnecessary personal information.
- Avoid publishing sensitive identifying details.
- Store images securely.

Images must never be used for inappropriate purposes.

21. Digital and Social Media Safety

Staff must not:

- Use personal social media accounts to develop inappropriate relationships with children.
- Exchange sexualised or private content.
- Request personal photographs from children.
- Conduct secret communications.
- Share confidential child information.
- Publish identifying information without authorisation.

Official communication channels should be preferred.

22. Child-Friendly Programmes

MFI programmes involving children should ensure:

- Safe venues.
- Appropriate adult-child ratios.
- Emergency arrangements.
- First-aid availability where appropriate.
- Safe transportation.
- Appropriate toilets and facilities.
- Accessibility for children with disabilities.
- Appropriate supervision.
- Clear attendance records.

23. Field Visits and Outdoor Activities

For plantation, mangrove, wetland, coastal, lake and community field activities:

- Conduct a risk assessment.
- Consider weather conditions.
- Provide appropriate supervision.
- Maintain attendance records.
- Ensure safe transportation.
- Provide appropriate protective equipment where necessary.
- Establish emergency contacts.
- Ensure children are not placed in unsafe environmental conditions.

This is especially important given MFI's field-based restoration, coastal, lake and environmental education activities.

24. Child Travel

Where children travel for an MFI programme:

- Obtain appropriate parental/guardian consent.
- Maintain participant lists.
- Ensure appropriate supervision.
- Use safe and authorised transportation.
- Avoid unnecessary one-to-one adult-child travel.
- Establish emergency contacts.
- Carry relevant medical/emergency information where appropriate.

25. Working with Partners

Partners working with children on behalf of MFI should:

- Agree to MFI's safeguarding standards.
- Have appropriate safeguarding procedures.
- Train relevant personnel.
- Report concerns.
- Cooperate with safeguarding investigations.

Contracts/MOUs should contain appropriate safeguarding clauses.

26. Child Participation

MFI should encourage children to express:

- Their views.
- Feedback.
- Concerns.
- Suggestions.

Participation must be voluntary, age-appropriate and safe.

Children should never be pressured to provide testimonials or photographs.

27. Risk Assessment

Before launching child-facing activities, MFI should assess:

- Location risks.
- Adult-child ratios.
- Transportation.
- Staff suitability.
- Online risks.
- Environmental hazards.
- Medical risks.
- Privacy risks.
- Emergency arrangements.

28. Record Keeping

Safeguarding records should be:

- Secure.
- Confidential.
- Access-controlled.
- Accurate.
- Retained according to applicable legal/organisational requirements.

29. Disciplinary Measures

Violations may result in:

- Warning.
- Mandatory training.
- Removal from child-facing duties.
- Suspension.
- Termination.
- Contract cancellation.
- Referral to authorities.

Serious misconduct may result in immediate action.

30. Policy Review

The policy should be reviewed frequently and after:

- A serious safeguarding incident.
- A major programme change.

- Relevant legal changes.
- Significant organisational restructuring.

NCPCR continues to publish and update child-protection guidelines and SOPs, so MFI should periodically check official guidance.





Mr. Meerasa
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