



## Going to School Children and Young Persons Safeguarding Policy

### 1) Scope

This policy is applicable to all initiatives undertaken by **Going to School** and to all employees, volunteers, contractors, interns, and consultants engaged with **Going to School** in whatever capacity. This policy is made with the intention of safeguarding the interests of children and young persons engaging with **Going to School** in different ways.

### 2) Definitions

1. **Allegation** is a claim or assertion that an individual has done something wrong or illegal, which has yet to be proven.
2. **Adolescent person** is any individual between the ages of 10-18 years old. For the purposes of this policy, individuals over the age of 18 will be treated as adults.
3. **Adult** is any person who is 18 years and older.
4. **Beneficiary** is an individual who receives assistance as part of an activity or programme, or otherwise benefits from the presence of **Going to School** without being a staff or contractor.
5. **Caregiver** is a person who provides day-to-day care for a child or a young person. They may be a parent, relative, family friend or other guardian. A caregiver does not necessarily imply legal responsibility for the person to whom the care is provided for.
6. **Child** means anyone under the age of 18, as defined by the UN Convention on The Rights of the Child, 1989.
7. **Child abuse and neglect**, sometimes also referred to as '*child maltreatment*', is defined as all forms of physical, emotional, psychological, or other ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust, or power.
8. **Child sexual abuse** is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. Child sexual abuse is evidenced by this 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. This may include but is not limited to:
  1. The inducement or coercion of a child to engage in any unlawful sexual activity;
  2. The exploitative use of a child in prostitution or other unlawful sexual practices; and
  3. The exploitative use of a child in pornographic performances and materials.



9. **Commercial or other exploitation of a child and or an adult** refers to use of an individual in work or other activities for the benefit of others, without their consent. This includes, but is not limited to, forced and bonded labour and trafficking. These activities are to the detriment of the individuals physical and mental health, education, spiritual, moral and social-emotional development.
10. **Child survivor** is a person under the age of 18 who has experienced any form of violence abuse or exploitation.
11. **Complaint** is the individual who is making the complaint under this policy and includes complaints made by beneficiaries, their representatives, as well as members of the **Going to School** staff.
12. **Confidentiality** is maintaining confidentiality requires those who are gathering information about an incident, allegation or suspicion to agree only to share information with the individual's explicit permission. All written information is maintained in a confidential place in locked files and only non-identifying information is written down. Maintaining confidentiality means never discussing details with colleagues, family or friends, unless they need to be informed as part of a mandatory reporting or referral process. *There are statutory exceptions to observing confidentiality which will serve as a valid defence in cases where confidentiality is breached.*
13. **Eligible Recipient** is any member of **Going to School** staff who is eligible to receive reports of abuse and/or breach of this policy.
14. **Internal Mandatory Reporting** refers to the organisational policy of **Going to School** which mandates that all staff and partners report any actual or suspected breach of the code of conduct within the organisation to their reporting manager within 24 hours.
15. **Parent** is a child's biological or adoptive mother or father.
16. **Partner** refers to any other individuals or organisations with whom **Going to School** is in a working relationship whether *formal* (i.e. there is an agreement in place, e.g. vendor, NGO, independent consultant, grantee, etc.) or *informal* (i.e. there is no agreement in place, e.g. sub-contractor, trustee, director, traveller, visitor, volunteer, etc.)
17. **Perpetrator** is an individual who commits an illegal or criminal act.
18. **Physical abuse** of a person is that which results in actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents.
19. **Safeguarding** refers to the activities undertaken and measures deployed to minimise, as far as possible, the risks to persons from vulnerable groups from all forms of harm, and in particular, those aimed at:
  - Protecting children and young persons from violence, abuse, exploitation at the hands of **Going to School** staff or partners.
  - Ensuring children and young persons are not harmed or put at risk as a result of the design and delivery of **Going to School** programmes, projects, events or activities.



- Centering the safety and wellbeing of children and young persons engaged with **Going to School** in all **Going to School** programs, initiatives and activities.
- 20. **Sexual Abuse** is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 21. **Sexual Exploitation** is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. This includes profiting monetarily, socially or politically from the sexual exploitation of another.
- 22. **Staff** is any person who is engaged in work with **Going to School** in the capacity of an employee (full time or part time), volunteer, intern, consultant or in any other capacity.
- 23. **Survivor** is an individual who has experienced sexual and gender-based violence. Survivor is often used in the psychosocial and social support sectors.
- 24. **Victim** is an individual who has experienced sexual and gender-based violence. Victim is often used in medical and legal spheres.
- 25. **Whistleblower** is any **Going to School** staff member person who makes a report of a breach of this policy or abuse by any **Going to School** staff.
- 26. **Witness** is any person present during an alleged incident who may be called to give testimony or evidence during a subsequent investigation.
- 27. **Young Person** is any person who is between the ages of 18-24 years of age.

### 3) Safeguarding measures at GOING TO SCHOOL

The following are the safeguarding measures we will undertake at **Going to School** to ensure the safety and wellbeing of children and young persons engaging with us.

- Ensuring that all employees, interns, and volunteers at the organisation are made aware of this policy, and have access to a copy of it.
- Ensuring that all team members assigned to work with children and young people will abide by the terms of this policy.
- Ensuring that a copy of this policy and an adequate briefing or other inputs are given to all partners with whom we work.
- Ensuring that a risk assessment is carried out for any project, event or activity involving children and young persons, and that the assessments and mitigating actions are signed off by the project manager.
- Obtaining prior and informed consent from all participants in all **Going to School** programs and activities.
- Obtaining necessary consents from parents/guardians for minors' involvement in programme and research activities and use of their stories and images.



- Sharing information about child protection concerns with agencies as required under statutory regulations.
- Recruiting members of the team likely to work with children and or young persons after conducting a thorough vetting and training process.
- Providing appropriate training and support for team members on protection issues so that they are clear about their reporting responsibilities, including but not limited to issues around confidentiality and making referrals.
- Reviewing our policy and good practice every two years or more frequently if required.
- **Safeguarding measures in communication:** The public use of images and stories of people poses potential protection-related risks for the Organisation and it is necessary that sufficient safeguarding measures are undertaken to prevent harm and abuse of children and young persons through such communication.
  - Any information, photograph, or video of a child and/or of a young person cannot be used without receiving the specific written consent of the individuals and/or their representatives as the case may be.
  - Personal information about a person (such as full name and date of birth or full names of family members) and information that could be used to identify their specific location within a country (such as village or community names, school, parish, etc.) should not be made available.
  - **Going to School** will not use images of children in state of undress, as doing so may promote the sexualisation of children.
  - All images and stories, along with accompanying details of individuals, should be used and kept according to relevant data and privacy laws and policy.

#### **4) Safeguarding obligations of *Going to School* Staff**

All **Going to School** team members are prohibited from engaging in the following harmful behaviour, including but not limited to:

1. Any behaviour or activity that could amount to sexual exploitation and abuse of children and young persons.
- Sexual relationships between team members and adult project beneficiaries that are based on unequal power dynamics are strongly discouraged since they may undermine the credibility and integrity of the work of the organisation.
  - Sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
  - Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of any **Going to School** products or remuneration that is due to children and young persons with whom we work.



2. Any other activity that is intended to cause physical or emotional harm, humiliation or exploitation to a child and/or to a young person.
  - Any activity, practice or behaviour that suggests a team member has abused their position of power and is engaging with beneficiaries based on inherently unequal power dynamics.
3. In addition, **Going to School** staff must:
  - Create and maintain an environment that prevents all forms of exploitation and abuse and promotes the implementation of this policy. Reporting managers at all levels have particular responsibilities to support and develop systems that maintain this environment.
  - Report any concern or suspicion of exploitation, including sexual exploitation, abuse or breach of the policy by a fellow member of staff or partner immediately via the established reporting mechanisms.
  - Be familiar with the reporting procedures and make sure you know how to contact your team lead to obtain guidance on how to manage disclosures of abuse that are external to the Organisation.

#### **5) Complaints of Staff Abuse and Alleged Breaches of this Policy**

1. Complaints can be made by beneficiaries of our programs either by themselves or through their legal representatives, as the case may be.
2. Complaints can also be made by **Going to School** staff members. In such cases, the staff members will be considered to be eligible whistleblowers and will have access to all relevant protections available to them under this policy.
3. All allegations of abuse made under this policy as well as complaints of breach of this policy will be thoroughly investigated.
4. In the case of a complaint against any **Going to School** Staff, an internal investigation will be undertaken. **Going to School** reserves the right to refer any matter regarding a member of staff or volunteer to the relevant statutory authorities as appropriate.

#### **6) Responsibility to Report**

1. **Going to School** has a responsibility to ensure that any allegation of abuse and/or breach under this policy is taken seriously and that the principles of confidentiality, anonymity, safety and welfare of the complainant are respected.
2. All **Going to School** staff members are obligated to report any and all instances of abuse and breach of this policy at the earliest failing which they will themselves be held responsible in breach of this policy.
3. The organisation has a mandatory internal reporting requirement which means that all **Going to School** staff are bound to report any concerns which suggest that children and/or young persons may be harmed or be at risk of harm by another member of the team.

#### **7) Whistleblowing and Allied Protections**



1. **Going to School** is cognizant of the fear of retaliation which can hinder the true and fair reporting of instances of abuse and/or breach of this policy and will undertake all measures to ensure that the whistleblower is protected from retaliation. We will do this by:
  - Ensuring confidentiality about the identity of the person reporting such abuse and/or breach of policy throughout the investigation and decision-making process.
  - Protecting their employment and all related benefits until the completion of the investigation.
  - In cases where the complaint is made in relation to their reporting manager, their reporting manager will be changed immediately until the investigation is completed.
2. **Going to School** will undertake all measures necessary, in addition to the above, on a case-to-case basis to prioritise and ensure the safety and wellbeing of the whistleblowers.

## 8) Procedure for Reporting

All complaints of abuse and/or of breach of this policy should be made to [safeguarding@goingtoschool.com](mailto:safeguarding@goingtoschool.com). In the event that your complaint is against the Founder and CEO, of the organisation, you are required to make complaints as per the statutory legal pathways available to you as well as under the Whistleblowers' Protection Act, 2014.

1. Please ensure that you have reasonable grounds to believe that the information you are disclosing is true.
2. While reporting abuse or a breach of this policy, please provide the following information:
  - Date, time and location;
  - Name(s) of person(s) involved, designation(s), roles(s)
  - Your relationship with the person(s) involved
  - The nature and details of the breach
  - How you became aware of the issue
  - Possible witnesses
  - Any other relevant information, evidence, or material that you have to support your report.
3. All complaints made under this policy will be investigated and addressed as per the code of conduct as well as grievance redressal policies at **Going to School**.

## 9) Confidentiality

1. All information on an individual's case is regarded as confidential and should only be shared with people that have a legitimate reason for accessing it once the individual's explicit permission has been granted.
2. When working with children and young persons, there will be limitations to the degree of confidentiality that can be observed as a result of statutory disclosure obligations. In such cases,



the reason for breach of confidentiality and the details of the relevant statutory disclosure obligations should be made available in writing.

3. All written information will be treated as confidential and recorded with only non-identifying information contained. All paper copies of the information will be stored in accordance with the relevant and applicable privacy-related statutes and policies.

#### **10) Consent regarding photos, videos, and other communication material**

1. The informed, written consent of the child **and** of a parent/guardian as well as that of young persons should always be obtained before a photograph or image of a child is used, and its intended or possible use(s) explained. The implications of using images, including risks and possible negative consequences, especially where images used on websites should also be fully explained. Ideally, children and parents should be consulted on use of images and stories at the start of a project and consents obtained that will prevail for the duration of the project. Where possible, the girl and family should be shown the image before it is published.
2. *Group Photographs:* As with individual photographs, it should be explained to the group what the photographs will be used for and consent sought from individuals in the group. Any individuals who wish to opt out should be allowed to do so.
3. *General Photographs:* Where using images of children and young persons in crowd scenes where it may be difficult or impossible to get consent, the following should be taken into consideration:
  1. Would the children attending the event expect photographs to be taken?
  2. Would children in the photograph probably consider themselves to be in a public place, with no expectation of privacy?
  3. Is it unlikely that anyone would object to the photograph being taken? (An individual could be in a public place, but may not want any images in which they are present being used.)
4. Where photographs are being taken at a planned event, as far as possible individuals should be told in advance that cameras will be present and how the photos will be used, in order that they can opt out of the event or notify organisers that they do not wish to be featured in any photographs.

#### **11) Training**

We recognise that training and education are essential to implementing this protection policy. All team members will be given training in relation to this policy in order to ensure that they are able to execute its obligations satisfactorily. The organisation will also provide opportunities for the team to request further support, understanding and implementing this policy.

#### **12) Communication about the policy**

This policy should be publicly accessible to all beneficiaries as well as partners who are seeking to engage with **Going to School**.



1. Formal agreements should highlight the organisation's commitment to safeguarding and safety and should explicitly require compliance with the principles and practices of the safeguarding policy.
2. Independent photographers and writers commissioned by the Organisation are considered as contractors/consultants and as such are subject to this Policy.

### **13) Identification, avoidance, and mitigation of risk**

This policy is to be read in conjunction with the risk assessment policy and should be used as a framework while identifying and developing strategies of mitigation against such risk.

#### **Child Protection Committee**

<b>Sr. No</b>	<b>Name</b>	<b>Designation</b>	<b>Email id</b>
1.	Rashmi Gurav	Program Manager	rashmi.gurav@goingtoschool.com
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