

Child Safeguarding and Protection Policy

1. Purpose

Every child has the right to a safe, happy, and dignified life, free from all forms of violence, abuse, neglect, and discrimination. By fostering inclusive, accessible, and nurturing environments, RDT is dedicated to protecting the rights of all children, including those with disabilities.

The purpose of this policy is to establish clear principles and procedures that ensure the safety, well-being, and empowerment of all children with whom RDT engages under its programs, schools, and community initiatives including children living in RDT premises under residential programs or any other program. The policy further extends to any children present in RDT's premises at any time and also includes children who are visiting RDT's projects, schools and community initiatives.

RDT's approach to child protection extends to physical spaces, digital environments, and all forms of interaction. Through this policy, RDT reaffirms its responsibility to protect children from harm, promote participation and equality, and foster a culture of care and respect across all levels of the organization.

2. Responsibility

The responsibility and obligation to uphold this policy lies with all persons working for, associated with, or visiting RDT, and covers every context in which RDT engages with children — including schools, residential institutions, field programs, community initiatives, health and sports projects, and digital or online environments and shall include:

a) RDT employees – all staff members at every level and across all departments and regions.

b) Associates and partners – including volunteers, interns, consultants, professionals, vendors, contractors, advisors, trustees, board members, representatives, partner organizations and their representatives, collaborators and any other individual engaged with RDT in any capacity

c) Visitors – including donors, sportspersons, journalists, artists, filmmakers, photographers, researchers, celebrities, law enforcement personnel, VIPs, parents, and family members of staff.

All persons referred to above have the responsibility to uphold RDT's commitment to child safety, protection, and inclusion — particularly for children with disabilities and those with additional support needs — and to ensure that all interactions, whether in person or online, reflect the highest standards of respect, care, and accountability.

3. Policy Statement

The Constitution of India recognizes children as equal rights-holders and accords them the highest priority for protection and well-being. India is a signatory to the United Nations Convention on the Rights of the Child (UNCRC) and has enacted a robust legal framework for child protection, including but not limited to:

- Juvenile Justice (Care and Protection of Children) Act, 2021.
- Protection of Children from Sexual Offences Act, 2012 (POCSO), and the Protection of Children from Sexual Offences (Amendment) Act, 2019.
- Right of Children to Free and Compulsory Education Act, 2009.
- Prohibition of Child Marriage Act, 2006.
- Child Labour (Prohibition and Regulation) Amendment Act, 2016.
- Rights of Persons with Disabilities Act, 2016 (for children with disabilities).
- Commissions for Protection of Child Rights Act, 2005.
- Pre-Conception and Pre-Natal Diagnostic Techniques (Prohibition of Sex Selection) Act, 1994.
- National Education Policy, 2020

RDT abides by the safeguards provided under the Constitution of India, the above-listed child-centered legislation, relevant international treaties, and its own internal policies. We are committed to upholding each child's right to safety, protection from intentional or unintentional harm, abuse, neglect, and exploitation in any form; the right to freedom of expression, to life, survival, and development; and the right to equality and non-discrimination irrespective of language, culture, religion, gender, economic or social background, disability (physical, sensory, intellectual, or mental), or ability.

Furthermore RDT is committed to the protection of digital personal data of children collected by RDT in accordance with the Digital Personal Data Protection Act 2023 which is covered under the Data Protection Policy of RDT.

Any employee, associate, or visitor of RDT who directly or indirectly harms, abuses, neglects, or exploits children in any manner, or who in any way infringes upon a child's rights, will stand in direct contravention of this policy. RDT will take necessary action to address such contraventions, including disciplinary measures, termination of association, and/or referral to law enforcement or statutory authorities, depending on the severity of the breach.

Our response to any breach of this policy shall be guided by the principle of the best interests of the child, ensuring accessibility, inclusion, respect for the child's views, and ensuring that processes are child-friendly, timely, and transparent.

4. Definitions

Child: For the purposes of this policy, a *child* is defined as any person under the age of 18 years, in accordance with the United Nations Convention on the Rights of the Child (UNCRC) and Indian law.

Child Protection: All measures, policies, and practices aimed at preventing and responding to abuse, neglect, exploitation, and violence against children. It includes both proactive steps to create safe environments and reactive measures to respond to concerns or violations.

Safeguarding: The broader concept of promoting the overall welfare, inclusion, and wellbeing of children. Safeguarding includes protecting children from harm, supporting their participation, and ensuring their rights are respected in all RDT programs, institutions, and digital spaces.

Child Abuse: All forms of physical, emotional, sexual abuse, neglect, and exploitation that cause actual or potential harm to a child's health, development, dignity, or wellbeing.

Physical Abuse: Any act that causes physical harm to a child, including hitting, slapping, shaking, burning, or any other action that results in injury or pain.

Corporal Punishment: Any act that is disciplining a child by hitting, pushing, grabbing, or using hurtful words that cause pain, fear, or humiliation.

Emotional (or mental) Abuse: Any behaviour that harms a child's emotional development, mental wellbeing, or sense of self-worth. This includes constant criticism, shouting, rejection, humiliation, threats, ignoring a child's feelings, withholding love or care, or exposing a child to domestic violence. Publicly shaming or comparing a child negatively can also deeply hurt their confidence and self-esteem.

Mental Abuse: Any behaviour that harms a child through hurtful words like shouting or insulting, ignoring a child's feelings or not showing love or care in front of others or comparing them negatively can hurt their confidence.

Sexual Abuse: Involves using a child for sexual gratification or exposing them to sexual content or activities. This includes touching, showing pornography, photographing a child in sexual or indecent ways, making sexual remarks, or any act where a child is exploited sexually — whether online or offline.

Neglect: The persistent failure to provide for a child's basic physical, emotional, educational, or medical needs, resulting in harm or risk of harm to their well-being or development.

Exploitation: Using a child for someone else's gain, profit, or advantage, including forced labor, begging, trafficking, sexual exploitation, or involvement in illegal activities.

Bullying: Repeated behavior by an individual or group intended to hurt, intimidate, humiliate, or dominate another person, creating fear or distress.

Cyberbullying and Digital Harm: The use of digital devices, social media, or online platforms to harass, threaten, or humiliate a child. A single act posted or shared online may also constitute cyberbullying due to its wide and lasting impact. Digital harm also includes inappropriate online contact, sharing of personal data without consent, and exposure to harmful or explicit content.

Children with Disabilities: Children who have long-term physical, sensory, intellectual, or mental impairments that, in interaction with social or environmental barriers, may hinder their full and effective participation in society on an equal basis with others.

Inclusive Protection: Ensuring that child protection measures are accessible, sensitive, and responsive to the needs of all children, including those with disabilities and from diverse cultural, linguistic, or social backgrounds.

Harmful Practices: Any cultural, social, or traditional practices that violate the rights or dignity of children, including child marriage, early or forced marriage, corporal punishment, discrimination, or exclusion based on disability or gender.

Contact with Children: Any form of direct or indirect interaction with a child, whether in person, over the phone, through digital communication, or by handling their personal information, images, or data.

Best Interests of the Child: A guiding principle that ensures all actions and decisions concerning children prioritize their safety, wellbeing, inclusion, and overall development above all else.

5. Responsibility for Implementation, Monitoring and Continual Improvement

The overall responsibility for the effective implementation, monitoring, and continual improvement of this Child Safeguarding and Protection Policy lies with the Child Protection Committees (CPC), under the leadership of the Presiding Officer. CPCs at all levels shall meet regularly to review cases, discuss preventive strategies, and identify areas for improvement.

To strengthen accountability and responsiveness at every level, RDT shall maintain a three-tier Child Protection Committee structure:

a) Internal Child Protection Committee (ICPC)

- Established in each school or institution.
- Members are staff who belong to that specific institution, such as teachers, caregivers, or hostel staff.
- The first point of contact for receiving and addressing child protection concerns or complaints.
- Responsible for ensuring immediate safety of the child, documenting reports, and forwarding serious cases to the External CPC.
- Includes representatives from staff, caregivers, and where appropriate, student and parent members.

b) External Child Protection Committee (ECPC)

- Composed of RDT staff who are not part of the concerned institution - ensuring independence.
- Members may include area coordinators, counsellors, or staff from other RDT departments who have no direct involvement with the child or the school where the case originated.
- Reviews cases referred by the ICPC, ensuring impartiality, fairness, and adherence to the principles of child rights.
- Provides guidance and recommendations for further action, and refers serious or unresolved cases to the Central CPC.

c) Central Child Protection Committee (CCPC)

- Members are individuals who work closely with children, oversee their welfare, provide guidance or supervision, and play key roles in ensuring safety, well-being, and compliance with child protection standards.
- Acts as the primary authority for supervision and decision-making for any significant or elevated child protection issues throughout RDT.
- Ensures consistency of standards, supports training and awareness programs, and liaises with statutory bodies, including the police, the National/State Commissions for Protection of Child Rights, and Child Welfare Committees where necessary.

6. Code of conduct

All RDT employees, associates, volunteers, partners, and visitors share the responsibility to uphold the highest standards of behaviour when working with or around children.

The Code of Conduct ensures that all interactions promote safety, dignity, inclusion, and respect, whether in person, online, or in the community.

a) Expected behaviour

All persons must:

- Treat every child with respect, empathy, and dignity, regardless of gender, disability, ability, age, language, caste, religion, culture, or social background.
- Listen to children, take their concerns seriously, and respect their right to express their views.
Create a safe, inclusive, and child-friendly environment where children feel valued and supported.

Use positive, non-violent, and non-discriminatory methods of communication and discipline.

- Protect children from all forms of harm, abuse, neglect, exploitation, and bullying — including online or digital harm.
- Respect the privacy and confidentiality of children and their families.
- Ensure that all activities, programs, and facilities are accessible and inclusive of children with disabilities.
- Obtain informed consent from children and/or their parents or guardians before taking or using photographs, videos, or stories.
Ensure that any image or story used represents the child respectfully and upholds their dignity and best interests.
- Immediately report any concerns, suspicions, or breaches of this policy to the relevant Child Protection Committee (Internal, External, or Central).
Fully cooperate in any child protection enquiry or review, maintaining confidentiality and professionalism.

b) Prohibited Behaviour

No person shall:

- Engage in any form of abuse, exploitation, neglect, or harassment of a child.
- Develop, support, or engage in any sexual or romantic relationship with a child, or behave in a sexually suggestive or provocative manner.
Be alone with a child in a secluded or private space where others cannot see or access them.
Use language, gestures, or behaviour that is inappropriate, offensive, discriminatory, or demeaning.
- Use private or unapproved digital communication (such as personal messaging apps or social media) to contact or interact with children.
Take, share, or post images, videos, or information about children without authorisation and consent.
Disclose personal or identifying information about a child without explicit permission from RDT or the child's guardian.
- Provide children with or encourage the use of alcohol, tobacco, drugs, or harmful substances.
- Show favouritism, discrimination, or exclusion of any child.
- Allow, ignore, or justify any form of bullying, violence, or power imbalance among children or between adults and children.
- Transport children in private or unauthorised vehicles without prior permission from RDT.

c) Professional and Personal Conduct

- This Code of Conduct applies both within and outside the workplace, including online activities, field visits, and public events.
- RDT expects all individuals to act as positive role models, upholding child rights, gender equality, disability inclusion, and respectful behavior in all settings.
- Staff and associates must declare any previous convictions or pending investigations related to offenses against children when joining or during their association with RDT.

7. Reporting on contravention of policy

All RDT employees, associates, volunteers, and visitors have a duty to act and report if they witness, suspect, or receive information about any form of abuse, neglect, exploitation, or harm to a child, including physical, emotional, sexual, digital, or discriminatory harm. Reports can be made verbally, in writing, or electronically within 48 hours of identifying a concern, using accessible methods for persons with disabilities. Failure to report or take action when a child's safety is at risk will be considered a violation of this policy.

All concerns must be reported through RDT's three-tier Child Protection Committee (CPC) structure. The Internal CPC, based at the school or program level, is the first point of contact and ensures the child's immediate safety. Serious or unresolved cases are referred to the External CPC, which ensures impartial review and may involve independent experts. Cases that require higher-level or organization-wide action are escalated to the Central CPC, which oversees compliance with national laws, coordinates with statutory authorities, and reports outcomes to the Executive Director and Board. In situations of immediate danger or criminal activity, any person may also contact the Police or CHILDLINE 1098 while informing the CPC.

Each CPC will ensure that investigations are child-friendly, confidential, and respectful, protecting the privacy and dignity of all involved. The CPC may consult external experts or government authorities, including the Child Welfare Committee or Police, when required. Findings and recommended actions will be documented in a written report. Appropriate disciplinary or legal action will be taken depending on the severity of the breach, in line with the Protection of Children from Sexual Offences (POCSO) Act, 2012 (amended 2019), and other applicable laws.

Children and parents or guardians who are dissatisfied with the outcome may appeal to the next-level CPC, which will review the case and determine whether to uphold or modify the decision. RDT will provide necessary support, including counselling, medical care, and rehabilitation where needed, and ensure protection for those who report in good faith.

8.Punishable Offences under Various Child Protection Laws in India:

Offences/Inappropriate Behaviours	Relevant Laws
Penetrative Sexual Assault, Aggravated Penetrative Sexual Assault, Sexual Assault (Non-Penetrative), Aggravated Sexual Assault, Sexual Harassment, Use of Child for Pornographic Purposes and Storage, Possession, or Circulation of Child Pornographic Material.	Protection of Children from Sexual Offences (POCSO) Act 2012 (Amended-2019) Bharatiya Nyaya Sanhita (BNS) 2023
Production, dissemination and use of Child Sexual Abuse Materials (CSAM)	Information Technology Act, 2000, POCSO Act, 2012 and Bharatiya Nyaya Sanhita (BNS) 2023
Disclosing the Identity of a child victim to anyone other than the appropriate authority	Juvenile Justice (Care and Protection of Children) Act,2015, POCSO Act,2012 and Bharatiya Nyaya Sanhita (BNS) 2023
Sale, purchase, or recruitment of children for any purpose, including illegal adoption, trafficking for sexual or labour exploitation, use of children by militant groups, giving children intoxicating liquor, narcotic drugs, tobacco products or psychotropic substances, offences against children with disabilities, and kidnapping	Bharatiya Nyaya Sanhita (BNS) 2023, Juvenile Justice (Care and Protection of Children) Act,2015, Immoral Traffic (Prevention) Act, 1956, Narcotic Drugs and Psychotropic Substances (NDPS) Act, 1985, Rights of Persons with Disabilities (RPWD)Act, 2016,
Corporal Punishment in Child Care Institutions and Schools	Juvenile Justice (Care and Protection of Children) Act,2015, Right of Children to Free and Compulsory Education (RTE) Act,2009
Adopting a child without due procedure through CARINGS and Child Welfare Committees or Promoting or Facilitating such illegal adoption	Juvenile Justice (Care and Protection of Children) Act,2015,
Employment of children below 14 years in any occupation or industry, and employment of adolescents (15–18 years) in hazardous occupations or industries.	Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 (Amended 2016)

Marrying a child, or promoting, permitting, or solemnizing a child marriage.	Prohibition of Child Marriage Act (PCMA), 2006
Use of pre-natal diagnostic techniques for determining the sex of the foetus, leading to or resulting in female foeticide	Pre-Conception and Pre-Natal Diagnostic Techniques (Prohibition of Sex Selection) Act, 1994