



*Child Development and  
Family Guidance*

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# CHILD PROTECTION POLICY

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Policy

OCTOBER, 2021

SETHU CENTRE FOR CHILD DEVELOPMENT AND FAMILY GUIDANCE  
Sethu, H. No. 5/84 & 5/48, Dhonvaddo, Saligao, Goa 403511 INDIA

*Sethu Child Protection Policy 2017 – revised October 2021*

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# GENERAL INFORMATION

## Introduction

Sethu is a charitable trust that was formed in 2005 to provide much needed care for children with developmental and behavioral concerns. ***Sethu's Mission*** is to be a bridge between children and their families, their schools and their communities to foster their complete development through assessments, therapy, educational initiatives, training, awareness and capacity building.

Sethu's Child Protection Policy is designed to protect all children who come to Sethu as well as children who participate in outreach programs held by Sethu. In this document, a child is defined as anyone under the age of 18.

Note: These guidelines to be followed in online and offline mode.

## Preamble

Sethu strives to provide the best possible services to children. Its work adheres to the principle of “best interests of the child at all times”. It believes strongly in child protection and wants to be able to provide a respectful and safe environment while ensuring the children in its responsibility do not come to avoidable harm.

Sethu will be protective of children under its care by being:

- PREVENTATIVE: Sethu representatives will take reasonable measures to ensure risks of harm to children are minimized.
- REACTIVE: Sethu representatives will take appropriate action to address concerns and respond promptly and adequately.

## Policy Statement

Sethu recognizes the personal dignity and rights of children towards whom it has a special responsibility and duty of care and respect. All Sethu trustees, staff, volunteers, interns and visitors undertake to create a safe environment for children and young people and to prevent their physical, sexual or emotional abuse.

## Background Principles

The Child Protection Policy at Sethu is based on the five laws mentioned below:

- Juvenile Justice Act 2000
- Protection of Children from Sexual Offenses Act (POSCO) 2012
- Right to Education Act 2009
- The United Nations Convention on the Rights of the Child (UNCRC) 1989
- United Nations Convention of the Rights of Persons with Disability (UNRCPD) 2006

## Aim and outreach of the policy

The purpose of this policy is to help everyone at Sethu to:

- Understand the importance of child protection issues
- Keep children safe by clarifying which behaviors constitute safe practice and which behaviors should be avoided.
- Place emphasis on the protection of children with special needs (CwSN), who use Sethu's services
- Give a clear message that unlawful or unsafe behavior is unacceptable and that, where appropriate, disciplinary or legal action will be taken.
- Affirm safer recruitment practices.
- Minimize the risk of misplaced or malicious allegations made against adults who work with children.
- Ensure that positions of trust are not abused or misused.
- Create a safe environment for children through preventative measures.
- Provide guidance to those who lead or manage child protection issues and promote good practice.

This policy covers all individuals involved with Sethu, including:

- Sethu Trustees
- Sethu staff
- Volunteers
- Student Interns
- Children and young people receiving therapy or participating in Sethu programs
- Visitors including our donors, well-wishers, participants in training, service providers, etc
- Program partners
- Parents and family members who accompany the child for therapy.

## Definitions and types of abuse

Child abuse and neglect is defined as all forms of action or inaction resulting in harm (or risk of harm) to children under the age of 18 years in the context of a relationship of responsibility, trust or power.

- **PHYSICAL ABUSE** results in actual or potential physical harm from 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. Examples include smacking, hitting, shaking, poisoning, burning, drowning or suffocating or deliberately making a child ill.
- **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.
- **EMOTIONAL ABUSE** includes the failure to provide a developmentally appropriate, supportive environment, so that the child can develop a stable and full range of emotional and social competencies. Acts of emotional abuse may include restriction of movement, patterns of shaming, scapegoating, threatening, scaring, discriminating, or other non-physical forms of hostile or rejecting treatment.
- **NEGLECT** is persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Examples could include excluding the child from participation in family social events and repeated failure of parents to use alternative augmentative communication devices to enhance the communication of children with disabilities despite providing the families the means and training to use such communication.

# PREVENTIVE STRATEGIES

## Environmental and other safety standards at Sethu

1. Utmost care will be taken to ensure a safe physical environment at the Sethu Centre premises.
2. Clear instruction/caution signs will be displayed wherever required in and around the Sethu centre. The signs should be written in English/Konkani/Hindi. All instructions/cautions need to be in pictorial form too. For example, safety signs on the trampoline, traffic signs for the approach roads, etc.
3. Dangerous items like scissors, knives and any poisons like insecticides, cleaning agents etc. must be kept out of reach of children
4. Furniture and toys must be checked at regular intervals to ensure that there are no sharp edges, loose or weak parts. The legs of plastic child-sized chairs must be skid-proof.
5. Written parental permission is required for any trips, outings, or activities for child clients that aren't common practice in the course of work.
6. Children and families will not be given access to Sethu's computers or WiFi password. Staff will ensure that all aspects of Internet safety are followed and there is no objectionable material of sexual or inappropriate content stored on Sethu computers or personal laptops, phones and other devices that are brought into the Centre. This excludes images or content that are required for teaching purposes in sexuality education. However, these will be kept properly secured.
7. First Aid: A First-Aid kit will always be available at Sethu Centre with the necessary medical supplies. First Aid training will be provided to all the staff at regular intervals. Any incidents where first aid has been administered to clients must be recorded on the case paper.

## Code of conduct for Sethu staff

All Sethu staff that has contact with children at any point must ensure the following:

1. Strive to be a role model at all times.
2. Treat all children equally, with respect and dignity.
3. Always work in an open environment and when alone with children during 1:1 teaching or counseling sessions, ensure that there is a window or door open
4. In case the child has to be unclothed for a medical examination, the staff member should explain to the child what is happening and always have a parent present in the room.
5. Use positive guidance and behavior management strategies in accordance with **Sethu's Behavior Management Policy** (Appendix 1). Behavior management techniques must not include physical, verbal or emotional harm.
6. Avoid using inappropriate or offensive language at all times.
7. Avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

8. Never handle children with physical force and avoid actions like pulling or grabbing children, particularly by their arms, legs, unless it is to ensure their safety in an emergency situation. Staff should avoid assisting children with anything of a personal nature that the child can do for himself or herself.
9. Acceptable circumstances for a Sethu staff to have physical contact with a child are only if the child is putting himself/herself or another person in danger. For example the worker may also need to pick up the child when s/he falls, help him/her into a chair and in cases where the parent needs assistance to carry the child to another room.
10. Never offer food items to the child without their parents/guardian's prior permission.
11. Keep all information related to children and their families confidential. Sethu staff must not reveal such information to any outside party except to those colleagues who have a professional role in relation to the child. In case other family members, school authorities or visitors request confidential information, permission must be obtained from the parents or guardians of the child. The staff will need to make a note of the same on the client's case paper. No personal or treatment information about clients will be given to the press or media by Sethu staff.
12. These staff guidelines will be followed by all staff when on duty regardless of the location i.e. during home visits, Sethu activities off site or while transporting children.

**All Sethu staff needs to recognize that failure to meet these standards of behavior and conduct may result in disciplinary action, including possible termination.**

## **Code of conduct for students interning at the Sethu Centre**

1. Student interns may interact with children at the Sethu Centre only with prior permission from their supervisor.
2. Students should never offer food items to the children at Sethu.
3. Student interns are allowed to take details of personal information about children or their families only as part of the case-history writing process during assessments or under direction of their supervisors.
4. Student interns are strictly prohibited from discussing any Sethu client with other interns or with anyone outside of the Sethu Centre. They are encouraged to ask questions related to learning to their respective supervisor or at the weekly meetings of the Sethu team.
5. While interacting with children at Sethu Centre, positive guidance and behavior management strategies in accordance with Sethu's Behavior Management Policy must be followed.

## **Guidelines for Volunteers at Sethu**

1. Any person who would like to volunteer with Sethu must fill up the Sethu Volunteer Form and submit it to the Director and Administrator, with the required documentation.
2. Volunteers must hand in recommendation letters from two referees who are well established professionals or known members of the community as a part of the verification process.
3. No volunteer can be left alone with children at any time

4. All volunteers are required to read Sethu's Child Protection Policy and sign an undertaking that they will abide by all its guidelines

## **Guidelines for Observers at Sethu**

1. Students and other interested individuals who would like to learn more about Sethu's work over brief periods can apply to be Observers, after filling the Request for Observership Form. They too will be required to submit at least one referee letter from a well known professional.
2. Any person from a foreign country who is visiting India on a tourist visa will not be permitted to volunteer at Sethu. However, they can be observers and will need to fill up the Request for Observation Form.
3. All observers from foreign countries need to submit a copy of their Passport and Indian Visa before they can join as an observer.
4. No observer should be left alone with Sethu child clients at any time.
5. All Observers need to read Sethu's Child Protection Policy and sign an undertaking that they will abide by all its guidelines.

## **Guidelines for visitors**

1. All visitors will register themselves when they come to Sethu and enter their name, address and other details in the Visitors Register. They will be given a Visitor badge which must be worn at all times while within the premises of Sethu Centre.
2. Visitors must always be accompanied by a Sethu representative while walking around the Centre during a visit
3. Visitors are not allowed to give any food items to children.
4. Visitors should refrain from asking for personal or treatment information about any clients of Sethu, as this cannot be divulged unless clear permission has been obtained from the family of the child.
5. Visitors are not allowed to take any photos or videos of clients and their families at Sethu Centre. Photos of the premises or teaching aids may be taken with permission from the accompanying staff member or Trustee.

## **Standards for Human Resources (i.e. Police Checks, Recruitment, Capacity Building):**

1. Every new selected professional will need to provide a Police Clearance certificate from their concerned police station prior to joining the Sethu Centre.
2. Personal information about the staff member, applicant or candidate during the application process will be obtained and they will be asked to sign an authorization release.
3. All Sethu staff will read the Child Protection Policy and sign a statement saying that they are aware of its contents and will abide by the guidelines
4. Staff members will receive training in child protection issues from time to time.

## **Standards for Communication (Guidelines for the use of images and texts regarding children for Press, Marketing, Fundraising Activities)**

1. Any young person/adult having their individual photograph taken for any type of promotion/awareness of Sethu should sign 2 copies of the **Photo, Video and Sound Recording Release and Consent Form** (Appendix 2). One copy is retained in a separate file at Sethu, while the other one is handed over to the family. In the case of minors (anyone under the age of 18 yrs) either parents or guardians should sign.
2. The safest photographic images to use of children for any purpose are "unidentifiable" photographic images, such as photographic images taken at a distance, from the side, from above, large group activities, etc. Parents' approval is to be taken before the photo is released.
3. If parents do not wish to make their children's pictures available on the internet or printed in promotional material or Sethu reports, then their decision should be respected.
4. Professional photographers should be made aware that any images taken will remain the property of the organisation and cannot be used or sold for other purposes.
5. Photographers will be supervised and will not be allowed individual access to children.
6. There should be no identifying personal information accompanying photographs, such as the child's name, address or telephone number. Group photographs reduce the risk of identifying individual children.
7. Only images of children that are relevant to the organization's activities and services will be used, such as children participating in an activity specifically associated with that organization.
8. As far as possible, once the report/video/promotional material is prepared, it should be shared with the families of the children to get their consent for its use. This is to avoid any distress caused to families about issues surrounding confidentiality and stigma and to facilitate their participation in the goals of using that material (i.e. training, to raise funds for Sethu, create awareness about various programs, etc).

## **Working with Partners:**

Any Sethu staff working with children at a location other than the Sethu Centre shall abide by the guidelines as per the organizational code of conduct for staff.

## **Monitoring and Adjusting the CPP:**

The Child protection officer shall audit the centre using the CPP audit tool once every month. The audit document shall be then filled in the CPP file.

Selected well-wishers, child protection experts and beneficiaries of Sethu services will be provided with a feedback form to review the Child Protection Policy once a year. The data will be collected and the CPP will be edited if required.

The Child Protection Policy at Sethu outlines the organization's commitment to ensuring child safety at all times and these guidelines should be followed in letter and spirit by all who work at or with Sethu and come into contact with the children and families we serve.

# CHILDREN WITH SPECIAL NEEDS

The protection of children with disability is of paramount concern to Sethu, as they form a large proportion of our clientele. Keeping children with special needs (CwSN) safe presents unique challenges, some of which are as follows

- 1) They are more vulnerable to abuse due to their communication difficulties, dependence on multiple carers, lack of training in personal safety, myths about their development and societal ignorance.
- 2) Identifying the abuse is more difficult for family members as well as professionals working with them
- 3) There is limited knowledge on how to handle issues around protection such as preventing abuse, early detection and responding to incidents

Keeping these limitations in mind, Sethu will make a special effort to work for the protection of CwSN. The following guidelines will be adhered to

- 1) Training in sexuality and safety of CwSN will be imparted to Sethu staff
- 2) Professionals working with CwSN will be alert towards any indicators of abuse and neglect and bring this to the notice of the Child Protection Officer for further action
- 3) A skilled Sethu professional who knows the child and is competent to handle the disability as well as the mode of communication will investigate and manage situations of abuse and neglect.
- 4) Sethu will endeavor to conduct preventive sexuality education for CwSN, as well as their parents and other carers.
- 5) The adapted So Safe® Program and other appropriate training materials will be used for personal safety and sexuality education. This is a rule based system using simple visual teaching tools to educate about people, relationships, touch and sexuality. The So Safe approach teaches OK and Not OK forms of touch. It divides people into various categories and clearly describes the appropriate form of contact and communication with each category. For CwSN who are clients of Sethu, professionals at Sethu will belong in the category 'Community Workers I Know'. For this group of people, it is OK to say hello, shake hands, give a high five and a kiss on the cheek, only on special occasions like birthdays. Hugging and kissing is discouraged. CwSN can like but not love Sethu professionals, who in turn will be friendly to them, but are not their friends, as per the So Safe guidelines. All staff should model appropriate social behavior and not encourage or accept inappropriate social behavior from children or adults, in order to strengthen their personal boundaries. By following the structured approach of So Safe, Sethu can ensure consistency of information and practice and thereby promote understanding of social situations, decreasing chances of abuse.

- 6) Children with communication difficulties who are regular clients of Sethu, will be given a personal communication passport to help others understand them and handle their behaviors correctly. Every effort will be made to teach them verbal and other forms of communication such as signing, gestures, communication books and electronic devices.
- 7) Alternative Augmentative Communication (AAC) devices developed for these children will have words necessary to describe an experience of abuse or neglect.
- 8) Other communication aids such as Personal Relationships books with a Help page, which promote abuse disclosure will be developed for non-verbal or communication impaired CwSN who are regular clients of Sethu
- 8) For care-dependent CwSN who require intimate personal care, Sethu staff should always make sure that a parent is present if they are requested for help.
- 9) If any CwSN has a seizure while at Sethu, s/he should be moved away from any dangerous areas and the proper first aid measures for seizures administered. A staff member should remain present, reassure and help the family to stay calm, prevent injury, turn the child to one side, keep airways unobstructed, loosen constrictive clothing, ensure ventilation and time the seizure. If the seizure persists for more than 5 minutes, medical help should be sought. This incident must be recorded on the child's case paper.
- 10) As part of the neurodevelopmental and medical assessment, investigation of genetic conditions may be required and in such situations photographs may need to be taken of the CwSN and his or her family members. Written parental consent in the **Consent Form for Photos for Medical Records** (Appendix 3) must be taken. The photographs then needs to be uploaded on Practo under the child file and deleted from the therapist phone.
- 11) All safety preventive measures outlined in this policy will also apply to CwSN

# CASE MANAGEMENT

Sethu upholds the safety of our clients to the maximum possible and will respond to any situation of abuse with utmost care and competence.

## Responding to specific situations

Any report or incidence of abuse that comes to the attention of any member of staff of Sethu needs to be handled sensitively and competently. These could be instances such as

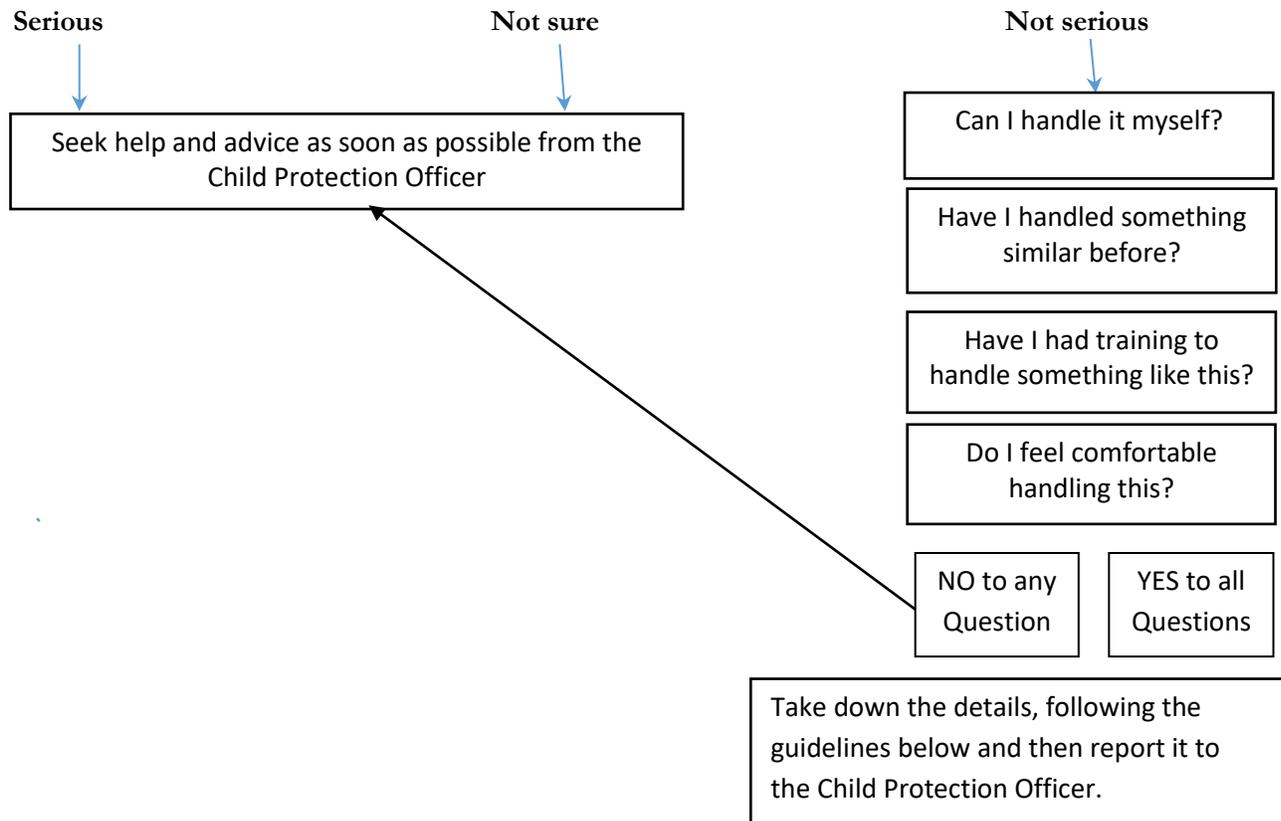
- 1) A child or any person caring for him or her comes to a staff member with an allegation or report of harm coming to a child
- 2) The staff member witnesses or suspects neglect or abuse
- 3) An anonymous complaint is received by any member of the organization.

**Here are some general useful tips to guide one's response:**

- 1) Use your common sense, backed up by good child protection practice.
- 2) Always be guided by the best interests of the child - ensure the immediate physical and psychological safety of the child.
- 3) If in doubt, ask Sethu's Child Protection Officer for advice.

Refer to the response flowchart below for further guidance.

## Response flowchart



With the passage of the Protection of Children from Sexual Offences Act, any disclosure, suspicion or incident of sexual abuse which comes to the notice of a Sethu staff, has to be reported to the police by law by the Child Protection Officer of Sethu.

This reporting should be made to the Special Juvenile Police Unit, if available or to the local police. Family members of the child should be informed about this legal requirement.

A signed waiver forms **Mandatory Reporting of Sexual Offences under POCSO** (Appendix 4) must be obtained from the parent/guardian of the child and attached to the child's case paper. The case must be reported by the CPO to the Special Juvenile Police Unit (SJPU) or the local police (Women and Child Cell in Panjim Police Station).

The police or the SJPU must then record the report in writing, ascribe an entry number, read the report over to the informant for verification, and enter it in a book. A FIR must be registered, and its copy must be handed to the informant free of charge. This police report must be carefully filed with the case paper. The CPO will appear in the Children's Court to give evidence on behalf of Sethu when the case comes up for hearing.

## Reporting abusive behavior

Any member of Sethu staff that is aware of the abuse of any of the clients should bring this to the notice of the Child Protection Officer. All staff should be alert to recognise any warning signs of abuse and do their utmost to create a safe environment for children and young people in Sethu. If anyone notices these signs, they should inform the Child Protection Officer for further action.

If a child or young person discloses abuse to any staff member, s/he should bring this to the attention of the Child Protection Officer. In case of an anonymous complaint of abuse received by any member of staff, the matter must be reported to the Child Protection Officer by the person who received it, as soon as possible.

Any staff member who is aware of abuse being perpetrated on a Sethu child by another staff member, the child's family member or anyone else, is obliged to report this to the Child Protection Officer of Sethu.

Any incidence or suspicion of neglect or abuse will be recorded with all details by the Child Protection Officer in the **Child Abuse Report Form** (Appendix 5)

In a professional relationship, any disclosure of current, on-going abuse that is criminal in nature cannot be considered as confidential. The need to protect the child overrides the issue of confidentiality.

Under no circumstances should there be any attempt to intimidate a complainant or dissuade him/her from proceeding with a complaint or disclosure of abuse.

## Allegations from a child - listening to a child's disclosure of abuse

### General points

- The Child Protection Officer (CPO) of Sethu is the first point of contact for any reporting of abuse.
- If a child or young person reports abuse, whatever the outcome, s/he must be taken seriously.
- Stay calm and in control and reassure the child that care will be taken to protect him/her and keep him/her safe. Do not appear shocked.
- Accept what the child says and write it down including information like dates, place, person/s involved. Accuracy is paramount in this stage of the procedure.
- Never ask leading questions. Do not fill in words, finish their sentences, or make assumptions. Do not repeat the same questions to the child. The person to whom the abuse has been reported has to only record the statements made by the child and NOT conduct an investigation.
- All details about the abuse should be recorded in the Child Abuse Report Form
- Assure them that they are not to blame for the abuse and they are right to tell you.
- Be aware that the child may have been threatened.
- Be honest. Let the child know what you are going to do next and that you will let them know what happens. Inform them that you need to tell someone else in authority.
- Do not permit personal doubt to prevent you from reporting the allegation to the designated CPO

### **At the end of the disclosure**

- Reassure the child that they are brave and did the correct thing by telling you, the abuse is not their fault and they have a right to be protected.
- Let them know what you are going to do next
- Immediately seek help, at first, from the designated CPO
- Write down accurately what the young person has told you. Sign and date your notes. Keep all notes in a secure place for an indefinite period. These are essential in helping your organisation/ Social Services/ Police decide what is best for the child, and can be used as evidence if necessary
- In case the abuser is known to the child, the first step is to ensure the safety of the child.
- Seek help for yourself if you feel you need support.

The CPO will take down the details of the case and urge the parents to seek appropriate medical, psychological and legal support. For emotional or physical abuse by the family members, this will include training in respectful discipline methods. If such abuse has been reported to have occurred in school or another educational institution, and perpetrated by a staff member, then Sethu staff should try to gather information from the school/concerned person too, so that guidance about proper discipline can be given.

Once the CPO has gathered the details of the case, s/he will make a decision about the next steps (action to keep the child safe, guidance to families, information gathering from school, contact a Child Rights NGO, inform the police, and so on) and inform the Director in writing. In cases of sexual abuse where there is mandatory reporting under POCSO, the CPO will notify the Director. The CPO will also report the case to another organization that deals with juvenile justice issues (such as Childline and Children's Rights in Goa), as well as the Women and Child Cell in the Panjim Police Station (Ph no: 0832-2428992).

In case of allegations or incidents of sexual abuse by a Sethu staff member, this will be treated with the utmost seriousness. Reporting will be done as per the above protocol. In addition, the Director will inform the Managing Trustee. The staff member who is suspected of abuse will be asked to step aside from his/her duties till the institutional and police inquiry is completed. If found to be guilty of abuse, disciplinary action will be instituted against the staff member, which may result in termination of services. For other forms of abuse such as physical abuse, the disciplinary action will depend on the circumstances and if there are extenuating circumstances, a written warning with corrective actions will be instituted.

## **Handling Injuries at Sethu:**

If any child attending therapy at Sethu gets injured while at Sethu, immediate first aid needs to be provided to the child. The first aid kit is available at Sethu centre. The professional attending to the child needs to fill the **Injury Report Form** (Appendix 6). In case the injury is severe then the child can be immediately referred to the District Hospital, Mapusa or Goa Medical College, Bambolim.

# CRECHE CHILD PROTECTION POLICY

The Sethu creche will adhere to the safety and protection guidelines as stipulated within Sethu's Child Protective Policy.

## Creche Facilities:

The Sethu creche extends its services to Sethu's clients and families, siblings of children brought to Sethu for services, children of staff as well as children living within 500 metres of Sethu.

## Creche Timings:

The creche timings are flexible and its services are open from 9 am - 5 pm, Tuesdays - Saturdays. The creche facility will be closed on Sundays and Mondays as well as any public holidays that are applicable to Sethu.

## Creche Location:

The Sethu creche is located within the Sethu Centre and is manned by a Creche incharge.

## Crèche environment:

- ★ The creche will ensure a nurturing, responsive and inclusive environment.
- ★ The crèche will be well ventilated and lit.
- ★ The creche will use safety gates to ensure that children within the creche facilities are safe and not able to run outside, into the kitchen areas and up the stairs.
- ★ The creche will have clear instructions/ caution signs displayed in 3 languages with associated visuals.
- ★ Toys used within creche will be age appropriate with no sharp edges. Broken toys will be replaced or discarded.
- ★ Hazardous materials like sanitisers/ cleaning materials will be kept locked or out of reach.
- ★ All electrical switches should be out of reach or are plugged with switch protectors.
- ★ The toys and furniture within the creche will be sanitised daily and soft toys will be washed regularly
- ★ The creche incharge will obtain written permission for any planned outings for children.
- ★ A First Aid box is available within the creche. The creche will regularly check the expiry dates of medication.
- ★ A log book of visitors/ volunteers/ observers will be maintained within the creche.
- ★ The creche will have an evacuation plan in case of emergencies which will be displayed at the crèche.
- ★ CCTV cameras should only be installed for the purpose of monitoring by the supervisor.
- ★ The creche in charge has to ensure that persons, known or unknown, except parents and staff/volunteers of Sethu be allowed inside the crèche during its functioning hours. All repairs and maintenance work should be done during weekends/holidays only.

## Creche Documentation

- ★ The creche intake forms will be filled and filed in a folder.
- ★ The intake form of each child in the creche will include a list of their preferences, any allergies and additional pertinent information.

- ★ The children will have their names well displayed and wear name badges when in the creche.

## **Creche Activities and Disciplinary Measures:**

- ★ The creche in charge will be respectful and use respectful discipline. The creche incharge will abstain from shouting or using unnecessary physical force to restrain children, unless it is to protect them from danger.
- ★ The creche incharge will plan age-appropriate activities to engage children within the creche.
- ★ The creche in charge will maintain a daily written log of activities conducted, the children who attended and the general outcomes from the activities.
- ★ A visual schedule will be used to help children understand the sequence of activities
- ★ Visual supports will be used to promote positive behaviour
- ★ A social story for introduction to the creche will be developed, updated and shared with caregivers of children seeking creche facilities.
- ★ The materials prepared by children like their drawings and other artwork will be displayed at the crèche to create a child friendly environment.

# DEFINITIONS/GLOSSARY

**CHILD:** For the purposes of this document, a “child” is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child.

**CHILD ABUSE:** According to the World Health Organisation, “Child abuse” or “maltreatment” constitutes ‘all forms of physical and/or emotional 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.’

**CHILD PROTECTION POLICY:** ‘A statement of intent that demonstrates a commitment to safeguard children from harm and makes clear to all what is required in relation to the protection of children. It helps to create a safe and positive environment for children and to show that the organisation is taking its duty and responsibility of care seriously.’

**INFORMED CONSENT:** Capacity to freely give consent based on all available information, according to the age and evolving capacities of the child. For example, if you seek consent from a child regarding taking their photograph and using it for publicity purposes, the child is informed as to how the photograph will be used and is given the opportunity to refuse. If a child is invited to give inputs on Sethu's child protection policy, they must be made aware of the time it will take, what exactly will be involved, their roles and responsibilities and only then will they be able to give their “informed consent”.

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# APPENDIX

## 1. Behavior Management Policy

Guidelines for Managing Challenging Behavior & Use Of Physical Restraint At Sethu

### What is challenging behavior?

Challenging behavior includes behavior that:

- Interferes with the child's learning
- Disrupts the day to day functioning of the child and family
- Threatens the safety of the staff, families and children
- Has a duration, frequency, intensity or persistence that is beyond the normal range that is tolerable
- Is less likely to be responsive to the usual range of interventions used to address the child's behavior.

Examples of different types of challenging behavior displayed by children include:

- Aggressive behavior - including pushing, punching, kicking, biting, scratching, threatening and verbal abuse
- Disruptive behavior - including screaming, tantrums, throwing objects, non-cooperation, running away;
- Destructive behavior - including destruction of property and the environment;
- Stereotypical behavior - particularly in children with learning disabilities and autistic spectrum disorders, which can include rocking, repetitive vocalizations, ritualistic hand movements
- Self-injurious behavior - including head banging, scratching and poking.

### Why does challenging behavior occur?

There are many reasons why children behave in a challenging manner. Therefore, first identifying the reason would help find a solution to the problems caused by the behavior.

Children with **communication difficulties** may engage in challenging behavior. If a child is unable to express his/her wants and needs because of a lack of understanding or ability to use language to communicate, challenging behavior may be used to express those wants and needs. In such cases, teaching a child to use acceptable and appropriate ways of communicating is part of the solution.

**Environmental factors** may contribute to the problem. Children may react negatively to noise, heat and cold or to invasion of their space. Some children, particularly children with autism, may be over sensitive to certain stimuli such as noise, and may therefore react by displaying challenging behavior.

**Attention-seeking** is often identified as a cause of challenging behavior. Some children may be unable to manage a particular task and may be frustrated or bored and may exhibit challenging behaviors. Attention-seeking behavior can also be a learned behavior which the child uses to get what they want. Even negative

*Sethu Child Protection Policy 2017 – revised October 2021*

attention can be motivating for some children, especially if they feel that this is the only attention they receive.

Factors associated with **socio-economic disadvantage** also influence the incidence of challenging behavior. Poor social skills and language development, associated with poor parenting skills may lead to a child exhibiting challenging behavior.

Challenging behavior may have an underlying **medical cause** or reason, such as pain, illness or sensory difficulties. Some forms of challenging behavior are particularly associated with certain conditions and disabilities such as repeated and involuntary body movements (tics) and uncontrollable vocal sounds (Tourette's Syndrome) or ritualistic or obsessive behavior (Autistic Spectrum Disorders).

## **Strategies for Promoting Positive Behavior – Prevention Is Better Than Cure**

The most effective method adopted by parents/teachers/therapists/caregivers (or anyone working with children) when attempting to manage challenging behavior is to prevent it occurring in the first place. Behavior patterns (negative and positive) can be learned, and therefore, that acceptable behavior can also be learned. Behavior can also be contextual, so children can be taught to behave in a certain way in particular contexts. Acceptable behavior is then reinforced which increases the likelihood of it recurring.

## **Promoting Positive Behavior at Sethu Centre**

Children have an inherent need for a safe and secure environment. The centre could be the only stable element in the life of a child who may not experience such security in other parts of his/ her life. Sethu staff should model positive behavior by treating children and adults with respect and building up a positive relationship with the children.

Children react well to routines and boundaries. Sometimes, there is a natural tendency to push the boundaries that are set for them and to test the limits of what they are and aren't permitted to do. Establishing and maintaining rules and routines during therapy sessions require a good deal of effort from the staff, but it has been shown to promote positive behavior.

The following strategies have been found to be effective in promoting positive behavior, when implemented appropriately.

1. Develop clear and simple rules (in discussion when appropriate) with the children. These can be displayed in the room, perhaps with visual clues for children who cannot read. About three to five rules, stated in terms of observable behaviors is most effective. Positive statements such as "Good sitting on the chair" are preferable to negative statements such as "Don't get up". Rules can be taught, practiced and reinforced by praise or reward. It is important that there are positive consequences for children to follow the rules. There must also be consequences for those who do not follow the rules.
2. All children respond to attention and therefore a focus on positive behavior will reinforce positive behavior. Catching the child being good and praising or rewarding them for this, places the focus of attention on expected behaviors (especially in a group setting).

3. Appropriate and expected behaviors must be reinforced. Reinforcers must be small, and attainable. Never take back a reinforcer and occasionally use the element of surprise (giving an extra reward unexpectedly).
4. Many disruptive behaviors occur at transition times (when children are moving from one activity to another). It is therefore beneficial to plan for transition. For example, “In five minutes, computer time will finish and then we will start work-time” (while showing the child a countdown timer along with visual cues for the next activity).
5. In order to make instructions more effective, the same should be given only after gaining the child’s attention. Further, instructions should be short, clear, specific and expressed in positive terms. Children should be given up to 10 seconds to comply. Children who comply should be reinforced.
6. Where applicable, children must be aware that misbehavior has consequences. These can be presented to a child as a choice, where a therapist might say “I have asked you sit quietly on the chair. If you continue to shout, your mother/father will have to leave the room.” In this way, children are accountable for their own behavior. In instances where children have difficulty understanding spoken language, using visual cues will be important.
7. Consequences should be consistent, immediate, reasonable and related to the concerned behavior.

## **Managing Aggressive or Violent Behavior**

Aggressive and violent misbehavior is not a regular occurrence at Sethu. However, when such incidents do occur, they are serious and cause a great deal of stress for those involved. When faced with a potentially violent situation the following steps may prove useful in de-escalating the situation.

- The child should be spoken to calmly, assertively and respectfully.
- The staff member(s) should stay at a safe distance.
- It should be made clear that you are listening to the child. This will help to find out how the situation has developed, and how it could be resolved.
- The child should be asked to consider possible positive outcomes and behaviors.
- The child should be given space and time to cool off and to respond to requests.
- If required for safety reasons, the child may be isolated. This may involve the child being removed from the assessment/therapy, if necessary with the help another staff member.
- It is important that every violent incident is recorded

## **Physical Restraint and Isolation**

Use of physical restraint and isolation has received much public attention in Goa in the recent years. In 2003, the Goa Children’s Act banned corporal (physical) punishment to children in all schools. Sethu believes that if restraint and isolation are used, these should be implemented only in an emergency situation and only if a child is in imminent and immediate danger.

Sethu’s policy on the use of restraint and isolation is as follows:

Sethu Staff is allowed to use such restraint and isolation only in the circumstances to prevent a child from:

- Committing an offence
- Causing injury to himself or herself and/or to others

- Damaging the property of others
- Behaving in way that prevents the maintenance of good order at Sethu

Due to shortage of space in the present premises, Sethu does not have a separate area for isolation. Hence this will need to be done within the session room, by ignoring the child's reactions while insuring the safety of all individuals present.

The following principles must be borne in mind when considering any use of physical restraint:

- Physical intervention carries the possibility of being interpreted as an assault.
- Physical intervention may carry the risk of injury to the child or to the adult involved.
- Any consideration of the use of restraint or containment should only occur as a last resort, where no other intervention is feasible or effective.
- The intention of any physical intervention must be clear and told to the child.

Sethu staff should only intervene physically to restrain a child:

1. In an emergency situation, where the child's behavior poses a threat of unavoidable, serious physical harm to the child or to others.
2. Where all other interventions have failed or are not feasible
3. With the minimum force required to ensure the child's safety.

Further:

1. Neither restraint nor isolation should be used as a punishment or to force compliance.
2. Interventions for children with behavior problems must emphasize prevention of out-bursts and use of motivation and reinforcement.
3. Any child who is secluded must be observed by an adult at all times.

At Sethu we encourage a coercion-free and safe climate with minimal use of restraint and isolation. We also recognize that emergencies may occur and restraint may be needed when behavior poses a clear and imminent physical danger to the child or others. In these situations, the above mentioned recommendations will be followed strictly and use of such restraint and isolation shall be documented in the child's case notes as well as discussed with the supervisor/Director.

## 2. Photo, Video and Sound Recording Release and Consent Form

Sethu Trust aims to reach out to all children, especially those with special needs and behavior difficulties to help them develop to their greatest potential. As part of its work, Sethu needs to record visual images and/or sound clips of children and their families, for purposes of assessment, treatment, training and awareness building. Sethu requires families to give signed permission for the same through the Photo, Video and Sound Recording Release and Consent Form

By signing this form, you are irrevocably giving permission to the Sethu Trust, which runs the Sethu Centre for Child Development and Family Guidance to take and use photographs, video or sound recordings of you/your child for the purposes mentioned below.

Your consent to the use of the photographs, video and sound recordings of you/your child's image, likeness, appearance, and voice is forever.

You/your child will not receive compensation for the use of your/your child's image, likeness, appearance, and voice now or in the future.

The photographs, video and sound recordings may be used in whole or in part, alone or with other recordings.

The photographs, video and sound recordings may be used for any assessment, therapy and review/evaluation purposes, educational materials, educational broadcasts, public awareness program, workshops and websites or promotion of Sethu Trust.

Undertaking:

I understand and agree to the conditions outlined in this photograph, video and sound recording release and consent form. As the parent or legal guardian of the participant named below and on behalf of me/my child, I irrevocably give consent to the Sethu Centre forever to make use of my/my child's image, likeness, appearance, and voice in photographs, video and sound recordings as described above. I acknowledge that I am fully aware of the contents of this release and am under no disability, duress, or undue influence at the time of my signing of this document.

Parent/Guardian Name: \_\_\_\_\_

Child's Name: \_\_\_\_\_

Parent/Guardian Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Sethu Professional Incharge: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### 3. Consent Form for Photos for Medical Records

I, \_\_\_\_\_ (name of the parent), father/mother of \_\_\_\_\_ (name of the child) hereby give consent for my family's and/or my child's photos/video to be taken as part of his/her medical records, to be used for the purposes of teaching and training only.

Date:

Name of Parent

Signature of the Parent

Name of Sethu staff member:

Signature:

## 4. Mandatory Reporting of Sexual Offences under POCSO

Date: \_\_\_\_\_

Name of the Child: \_\_\_\_\_

Age: \_\_\_\_\_

Gender: M /F

Parent's/Guardian's Name: \_\_\_\_\_

Relationship to Child: \_\_\_\_\_

Home Address: \_\_\_\_\_

This is to state that I have sought the services of Sethu Centre for Child Development and Family Guidance voluntarily in order to get assessment and treatment for my child \_\_\_\_\_, against whom a sexual offence has been committed.

I am aware that under the Protection of Children from Sexual Offences (POCSO) Act, there is the requirement of mandatory reporting by professionals to the local police. Hence the staff of Sethu Centre for Child Development and Family Guidance will be reporting my child's case to the Women and Child Cell of Panaji Police Station. This has been brought to my attention.

Signature of parent/guardian: \_\_\_\_\_

Name of parent/guardian: \_\_\_\_\_

Signature of Sethu staff: \_\_\_\_\_

Name of Sethu staff: \_\_\_\_\_

## 5. Child Abuse Report Form

Name of the child:

Date & Time of Observation:

Describe fully the incident, situation, or behavioral and /or physical indicators of abuse including date and time. Describe fully, using the child's words, the interaction between the child and the person to whom the child disclosed.

Describe fully the physical condition of the child, including injuries, burns, welts, signs of disease.

Describe fully the emotional condition of the child, including behavioral problems, self-esteem, and the child's response to disclosure.

If known, describe fully the risks of further abuse to the child, including the access of the alleged abuser to the child.

Describe the action planned/taken after recording this report:

Name of the person making the report: \_\_\_\_\_

Signature: \_\_\_\_\_

Name of the Child Protection Officer: \_\_\_\_\_

Signature: \_\_\_\_\_

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## 6. Injury Report Form

Date:
Name and signature of person filing report:
Name of injured child:
Date and time of injury:
Where was child when he/she was injured?
What was child doing at time he/she was injured?
Explain the details of the injury:
What first aid treatment was given to the child?
Name of the person who gave the first aid:
Name and address (clinic/hospital) of the doctor if the child was referred to any doctor outside the centre:
Comments:
Parent present during the incident: Yes / No Name Signature with date and time
Staff member present when the incident took place: Yes / No Name: Signature with date and time:
Centre Director/Child Protection Officer Name: Comments: Signature with date and time:

## 7. Confidentiality Agreement

### CONFIDENTIALITY AGREEMENT

I \_\_\_\_\_ agree on the following statement.

As a Volunteer/Intern/Observer, I understand that I may come in contact with confidential information during my time at Sethu. As part of the condition of my work with Sethu I hereby undertake to keep in strict confidence any information, data, images, videos regarding Sethu and its clients that comes to my attention. I will do this in accordance with Sethu's principles and Child Protection Policy and the law.

I also agree to never remove any confidential material of any kind from the premises of Sethu unless authorized as part of my duties, or with the express written permission or direction to do so from a senior member of Sethu staff.

Name:

Sign:

## 8. Sethu CPP Audit Checklist

Name of the Auditor: \_\_\_\_\_ Date of Audit: \_\_\_\_\_ Location: Sethu/AATISH

Sl. No	Audit Points	Yes/No	Remarks
1	Visitor's book updated with the required details.		
2	Volunteers/interns/observers attendance register updated with sign in and sign out time.		
3	The confidentiality file for intern/observers/volunteers is updated (i.e. signed confidentiality agreement is present with govt ID proof).		
4	The photo/video consent file is updated for all the events		
5	Staff police verification has been done and filed by the administrative team.		
6	Complaint/suggestion box to be checked and the same reported to the CPO and Director.		
7	Poster about Sethu CPP is displayed at the waiting area of Sethu Centre and AATISH centre.		
8	Sethu CPP is updated with the latest rules and regulations.		
9	The First aid kit has been checked during the audit for expired medication or for replacement.		
10	All staff to wear their ID cards at all times if found without it he/she will have to pay a fine of Rs. 20/-		
11	CPO has checked that all new staff has read Sethu's CPP and understood the same		
12	No environmental/infrastructural factors are present that may lead to child protection issues, if yes please highlight in remarks		
	No Smoking sign present		
	Parking Sign present		
	Rooms closed from outside when not in use for therapy		
	Safety gate kept closed at all times		
	Clean toys		
	Therapy room clean and well organised		
	No Sharp Objects around		
	Clean surroundings		
	Waiting area clean and tidy		

Sign of the Auditor: \_\_\_\_\_

Sign of the incharge: \_\_\_\_\_

# SETHU'S CRECHE CPP AUDIT CHECKLIST

## ENVIRONMENTAL AUDIT:

AUDIT QUESTION	YES	NO	COMMENTS/ NOTES
Creche is well ventilated and lit			
Safety gates used to prevent children from: <ul style="list-style-type: none"> <li>▪ Running out of the creche</li> <li>▪ Running into the kitchen area</li> <li>▪ Running up the stairs</li> </ul>			
Corner protectors to cap sharp edges of the staircase & furniture			
Clear instruction/ caution signs displayed in 3 languages with visuals			
Toys are age appropriate with no sharp edges and broken toys			
Hazardous materials like sanitisers/ cleaning materials are kept locked or out of reach			
Electrical switches are out of reach or are plugged with switch protectors			
Toys/ Furniture sanitised daily and soft toys washed regularly			
Written permission for any outings including a walk around the creche			
First Aid box available with a regular check on expiry dates of medication			
Log book of visitors/ volunteers/ observers maintained			
Demarcated separate areas for sleeping, eating and conducting activities.			

Evacuation plan in case of emergencies planned and displayed at the crèche.			
<b>TOTAL SCORE</b>			

## DOCUMENTATION AUDIT:

AUDIT QUESTION	YES	NO	COMMENTS/ NOTES
Intake forms are filled and filed in a folder.			
The intake form of each child in the creche includes a list of their preferences, any allergies and additional pertinent information.			
Children have their names well displayed and wear name badges when in the creche.			
<b>TOTAL SCORE</b>			

## STAFF AUDIT:

AUDIT QUESTION	YES	NO	COMMENTS/ NOTES
The creche in charge practiced respectful discipline: No shouting or use of unnecessary physical force to restrain children, unless to protect them from danger.			
<b>TOTAL SCORE</b>			