



## Child Protection Policy

### 1. 'Thoughts to Action' – Our Story, Vision, and Mission

'Thoughts to Action' (hereinafter, '**TTA**') is a social development organization, working with children and young people from diverse social and economic backgrounds, with a strong focus on government schools and community learning spaces in Assam. TTA's mission is to make artistic expression accessible to all, fostering a judgement-free environment where everyone can freely unleash their creativity. Thoughts to Action is committed to upholding the rights, dignity, and safety of every child we engage with. Children are at the heart of all our programs, and their well-being guides our values, decisions, and practices. This Child Protection Policy reflects our responsibility to ensure that all children associated with the organisation are protected from harm, abuse, neglect, and exploitation, and are treated with respect, care, and sensitivity at all times.

TTA offers its services through three main projects (hereinafter, '**Activities**'), which entail regular interaction with Children:

- i. *Social-emotional learning through art*: Under this project, TTA partners with government schools (hereinafter, '**Partner Schools**') to offer one-day immersive workshops wherein Children are introduced to various art materials and 1 year transformative courses employing art-based curriculum integrated with social-emotional learning components to nurture their holistic development.
- ii. *Early childhood education*: Under this project, TTA runs a playschool & day care school under the name 'Haatipoti'
- iii. *Artist engagement*: Under this initiative, TTA collaborates with artists to do mural paintings in schools along with Children, teachers and parents.

### 2. Child Protection Policy Objectives

Per World Health Organization's report, Child Maltreatment is a significant public health problem and a violation of fundamental human rights, including the right to life, right to protection from all forms of violence, and the right to enjoy the highest attainable standard of health. To ensure the overall well-being and protection of the Children it works with, TTA has adopted certain best-practices, based on prevailing laws in India and international directions. The main objectives of this Child Protection Policy (hereinafter, '**Policy**') are:

- i. To sensitize and make aware TTA's Collaborators and all other stakeholders on the best practices adopted by TTA, directed towards the overall well-being of Children;
- ii. To ensure adherence to the best practices at all times; and
- iii. To map a procedure for Children and Collaborators to report incidents which may cause potential harm, in any manner whatsoever, to the Children TTA works with.

### 3. Scope and Applicability

This Policy is applicable to all ad-hoc and full time collaborators of TTA, including but not limited to, the TTA in-house team, volunteers, fellows, staff, Partner Schools, donors, visitors, consultants, interns, vendors, and suppliers. TTA undertakes to circulate a copy of this Policy to all its Collaborators and expects them to be aware of, understand, and abide by the Policy.

### 4. Key Definitions

- i. **Child / Children** – For the purpose of this Policy, a Child is defined as anyone who has not completed the age of eighteen years.
- ii. **Child Maltreatment** – Any form of physical (including but not limited to corporal punishments), psychological or emotional ill-treatment, sexual abuse, neglect, negligence or commercial or other exploitation directed towards Children, which results in actual or potential harm to a Child's health, survival, development or dignity.<sup>1</sup>

*Explanation:* For clarity and guidance, reference may be made to the below non-exhaustive sub-definitions<sup>2</sup>:

- a. *Physical abuse*: Causing injury or harm to a Child, for example, by hitting, kicking, or beating.
- b. *Emotional abuse*: Isolated incidents as well as a pattern of failure over time on the part of a Collaborator to provide a developmentally appropriate and supportive environment.
- c. *Sexual abuse*: Includes non-contact sexual abuse (e.g. threats of sexual abuse, verbal sexual harassment, indecent exposure, exposing a Child to pornography, sending unpleasant or explicit content); and contact sexual abuse (e.g. sexual assault, inappropriate touching, fondling, kissing).<sup>3</sup>

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<sup>1</sup> Based on WHO's Fact Sheet on Child Maltreatment, September 19, 2022

<sup>2</sup> Based on WHO's Clinical Handbook for Health Professionals, titled "Responding to Child Maltreatment"

<sup>3</sup> Additionally based on The Protection of Children from Sexual Offences Act, 2012

- d. *Neglect*: Includes a Collaborator's failure to provide for the development and well-being of a Child. This includes failure of a Collaborator to provide a conducive environment with respect to health, education, emotional support, nutrition, shelter, living conditions, etc., to the extent they are responsible for providing the same.<sup>4</sup>
  - e. *Exploitation*: Includes, but is not limited to, actions of Collaborators that breach, directly or indirectly, a Child's right to privacy or the data protection laws prevailing in India.
- iii. **Child Protection** – Prevention of, and response to, Child Maltreatment.<sup>5</sup>
  - iv. **Child Protection Officer** - The person designated by TTA as the first point of contact for reporting of Instances.
  - v. **Collaborators** – All ad-hoc and full time collaborators and partners of TTA, including but not limited to, the TTA in-house team, volunteers, fellows, staff, Partner Schools, donors, visitors, consultants, interns, vendors, and suppliers. For clarity, Collaborators also include any third-party personnel or organizations including but not limited to artists, donors, funders, that are not a part of TTA's management, but aid or collaborate with TTA to discharge its objectives or participate in its Activities.
  - vi. **Instances** - Any event involving, directly or indirectly, any form of Child Maltreatment or violations of any other kind, whether or not expressly covered in this Policy, against any Child TTA works with.
  - vii. **Media** – Any medium, including but not limited to print, audio or video; online or offline; used to disseminate information.
  - viii. **Personal Data** – Any data or information, including but not limited to name; address; contact details; photographs; videos; that can be used to trace the identity of a Child.<sup>6</sup>
  - ix. **Premises** – Any physical or online space where TTA or its Collaborators operate out of.

## 5. Best Practices – DOs and DON'Ts

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<sup>4</sup> Additionally based on The Juvenile Justice (Care and Protection of Children) Act, 2000

<sup>5</sup> Based on UNICEF's Child Protection Strategy 2021-2030

<sup>6</sup> Based on the Indian Digital Personal Data Protection Act, 2023.

For the ease of reference of its Collaborators, TTA has summarized some best practices, based on the prevailing laws in India as well as international directions, in the form of 'DOs' and 'DON'Ts'. TTA expects its Collaborators to always be aware of and work in alignment with TTA best practices.

Given the nature of its Activities, which requires day-to-day interaction with Children, TTA reserves its right to direct its Collaborators to sign a written declaration stating details of any criminal accusations (that are currently under judicial scrutiny or investigation) and convictions, prior to collaborating with TTA.

## **DOs**

TTA and all its Collaborators undertake and are expected to:

- i. Treat all Children with respect, dignity, and equality.
- ii. Create a conducive environment for learning and development and maintain a safe environment for all students ensuring their physical and emotional well-being.
- iii. Use age-appropriate language while interacting with Children, directly or indirectly, and to respect the autonomy and wishes of a Child. If a Collaborator is unsure of whether any proposed action or language is 'age-appropriate', they are encouraged to check with the Child Protection Officer or the designated supervisor *before* proceeding with the proposed action or using the proposed language.
- iv. Promote education and impart life-skills in Children. This includes adoption of measures and approaches to aid in increasing or maintaining enrolment of Children in Partner Schools or other institutions with the same or similar quality.
- v. Make Children aware of their rights as well as what amounts to Child Maltreatment.
- vi. Recognize signs and symptoms associated with Child Maltreatment. This would also require for the Collaborators to participate in any awareness drives that TTA may organize from time to time.
- vii. Report Instances to their designated supervisor or the Child Protection Officer, upon gaining explicit or implicit knowledge of the same, at the earliest and preferably in writing. The Collaborator is free to exercise its right to remain 'anonymous', should they wish to, while reporting such Instances. If such choice is exercised, TTA undertakes to respect the informer-Collaborator's identity to the extent possible and unless required to be disclosed under the applicable law. If TTA considers it necessary to disclose the informer-Collaborator's identity to anyone for any reason, TTA shall strive to make the informer-Collaborator aware of the same.

viii. At all times, respect the confidentiality of Child's Personal Data and ensure that all such information is handled with adequate care and caution. Towards this, the Collaborators are required to:

- Themselves seek, and ensure other Collaborators also seek, informed, written, and specific consent (see Annexure A to this Policy; hereinafter, '**Consent**'), from the parents or lawful guardians of a Child, as the case may be, for collecting any Personal Data relating to any Child, including photographing or filming any Child.
- Themselves seek, and ensure other Collaborators also seek, Consent, from the parents or lawful guardians of a Child, as the case may be, for storing in TTA's records, or disseminating (through any Media whatsoever, including but not limited to social media) any Personal Data relating to any Child.
- For clarity, Personal Data of any Child can only be collected, disseminated, or stored after seeking necessary Consent and only for the performance of a Collaborator's assigned duties or performance of TTA Activities or TTA Promotional Activities.
- Understand and agree that Personal Data relating to any Child can only be stored with TTA. TTA shall ensure that the Child's Personal Data is safely stored using reasonable security practices. Collaborators may be allowed to store a copy of the Personal Data for limited purposes, after obtaining prior written permission from TTA. If TTA permits any Collaborator to transfer or store copies of any Personal Data, the Collaborator shall sign a written undertaking promising that the Personal Data will be stored using reasonable security purposes, used / stored only for the permitted purpose and for the permitted time duration, and not further transferred to any other party, including other Collaborators.
- Submit a copy of the duly sought Consent, as prescribed in Annexure A to this Policy, to TTA as soon as such Consent is obtained.
- Ensure that all the images/videos taken of the Child are respectful of their dignity and are not explicit or provocative in nature.

## **DON'Ts**

The Collaborators undertake and are expected to:

- i. Not employ Children as domestic workers in their homes or businesses or on the Premises.

- ii. Not invite or let accompany anyone not expressly authorized by TTA to enter / operate Premises or otherwise deal with Children.
- iii. Not discriminate Children on the basis of gender, caste, religion, race, class, background, culture, ability, or any other aspect of their being.
- iv. Not inflict any form of punishment that could affect the physical or emotional well-being of a Child or result in Child Maltreatment (for example, public humiliation). Corporal punishments are strictly prohibited.
- v. Not give gifts or monetary rewards (without TTA's prior permission) or treat any Child specially or preferentially.
- vi. Not use or direct harassing words or actions towards any Child, or engage in any other form of Child Maltreatment.
- vii. Not collect, store (with TTA or otherwise), transfer or disseminate any Personal Data relating to a Child for which Consent has not been sought and submitted to TTA.
- viii. Not use Personal Data relating to a Child for any purposes other than those that are allowed under this Policy (or otherwise approved by TTA) and for which Consent has been sought and submitted to TTA.
- ix. Not collect, store, disseminate or transfer, without TTA's permission, in their personal capacity, any Personal Data relating to Children.
- x. Not deal with a Child's Personal Data in any manner that is likely to cause a detrimental effect on the well-being of a child.
- xi. Ensure that the Child is not exposed to any inappropriate electronic material, including but not limited to material encouraging use of drugs, cigarettes or any intoxicating substances, crime, violence, terrorism, racism, sexism, self-harm, suicide, cruelty, gambling and pornography.

## **6. Reporting and Redressal Mechanism**

Any Collaborator, upon becoming directly or indirectly aware of an Instance, or upon suspicion of the possible occurrence of an Instance, shall inform the Child Protection Committee, preferably in writing. TTA undertakes to maintain confidentiality of the informer-Collaborator, subject to the requirements (if any) needed under the applicable and prevailing law in India.

Upon receipt of first information of an Instance, TTA, under the leadership of the Child Protection Committee, shall take all reasonable measures to conduct a preliminary investigation of the reported Instance and record its findings in writing.

While conducting an investigation, TTA undertakes to (and expects its Collaborators to do the same) adopt all necessary measures to ensure protection of the privacy and confidentiality of the Child or Children to whom the Instance relates to. Further, TTA undertakes to (and expects its Collaborators to do the same), conduct all enquiries sensitively and empathetical, free from any judgement with respect to the Child or Children to whom the Instance relates to.

If the preliminary investigation leads to suspicious findings, TTA undertakes to inform the concerned legal authorities for further enquiry and co-operate with them in every manner possible. TTA expects its Collaborators to afford similar co-operation during the course of an investigation.

Current Child Protection Committee: **Purbali Tungkhungia, Rahul Bora, Sanghamitra Tungkhungia**

## **7. Review**

TTA will review this Child Protection Policy periodically and update it whenever required. Revisions will be made in response to learning from practice, feedback from children and stakeholders, changes in organisational processes, or updates in relevant laws and guidelines, to ensure the policy remains relevant, effective, and child-centred at all times.

## Annexure A

### CONSENT FORM

Dear Parent/Guardian,

We, Thoughts to Action (hereinafter, 'TTA'), are a youth led social development organization, offering workshops and transformative year-long courses for children, through art-based curriculum to teach social and emotional learning components that nurtures children's holistic development.

As a part of our efforts to document/ promote our work, we collect and maintain records of personal data (such as names, address, age, contact details, photographs, videos etc.) of the children taking part in our activities and occasionally –

- a) use the said information on our website, social media platforms, and other promotional material (printed/online) including but not limited to calendars, annual reports and newsletters to showcase our achievements and our design proposals submitted to other organizations ('**Promotional Activities**').
- b) share the said information with our ad-hoc or full time collaborators and partners, including but not limited to, the TTA in-house team, volunteers, fellows, staff, Partner Schools, donors, visitors, consultants, interns, vendors, and suppliers, third-party personnel or organizations such as artists, donors and funders.

In regard to the aforesaid, to ensure that we are in compliance with the legal and ethical standards, we request you to sign the below form consenting to us collecting, maintaining in our records and using and sharing your child's personal data.

Child's full name:	
Date of Birth:	
Parent/Legal guardian's name:	
Email:	Phone number:
<p>I, the undersigned, am the parent/legal guardian of the above-named child and hereby grant consent to TTA to collect, maintain and share records for TTA's Promotional Activities, my child's:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Photographs</li><li><input type="checkbox"/> Videos</li><li><input type="checkbox"/> Name, address, age, contact details</li></ul> <p>I further grant consent for the aforesaid agreed upon information to be used on TTA's:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Website</li><li><input type="checkbox"/> Social media platforms</li><li><input type="checkbox"/> Newsletters, magazines and publications</li><li><input type="checkbox"/> Annual reports</li><li><input type="checkbox"/> Design proposals</li></ul> <p>I hereby confirm that I understand the reasons for which TTA may wish to use the above information pertaining to my child and that I can amend or withdraw my consent at any time by writing to TTA's concerned person, Mr./Ms. _____ at _____.</p> <p>Signature : _____ Date: _____</p>	