

**CHILDREN AND VULNERABLE ADULT**  
**SAFEGUARDING POLICY**

**SAHAYOG SOCIETY**

**A-240, INDIRA NAGAR, LUCKNOW**





## **FOREWORD**

This policy represents SAHAYOG’s firm commitment to ensuring the dignity, safety, and rights of every child and vulnerable adult we engage with. In the course of our development and humanitarian work, we recognize the heightened risks faced by children, persons with disabilities, and those in dependent or marginalized circumstances.

SAHAYOG takes its safeguarding responsibility seriously. This policy outlines the principles and procedures for preventing abuse and exploitation, reporting concerns, and responding swiftly and appropriately to all safeguarding incidents.

It is a shared responsibility among staff, partners, volunteers, consultants, and anyone who interacts with our work. We aim to cultivate a culture of accountability, transparency, and trust, ensuring that all voices—especially those of the most vulnerable—are heard, respected, and protected.

s/d

**DIRECTOR**  
**SAHAYOG**



## **LEGAL ANCHORING CLAUSE (2025 Addition)**

This policy shall be interpreted and enforced in alignment with:

- The Juvenile Justice (Care and Protection of Children) Act, 2015
- The Protection of Children from Sexual Offences (POCSO) Act, 2012
- The Rights of Persons with Disabilities (RPwD) Act, 2016
- The Digital Personal Data Protection Act, 2023
- The Constitution of India – Articles 14, 15(3), 21, 39(e), 39(f), and 45
- The UN Convention on the Rights of the Child (UNCRC)
- The UN Convention on the Rights of Persons with Disabilities (UNCRPD)

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### **1. DEFINITIONS**

- **Safeguarding of children or adults-** A set of organizational policies, procedures and practices designed to ensure that no harm comes to people as a result of contact with an organisation's programmes, operations or people Child.
- **Child** - A person under the age of 18 years.
- **Adult** - A person aged 18 years and older. Note that an adult with or without disabilities has the same legal capacity
- **Adult-at-risk (vulnerable adult)-**
  1. Any person aged 18 years and older who may be at risk of abuse or exploitation due to their dependence or reliance on others for services, basic needs or protection, and according to context, for example, in humanitarian situations
  2. An adult may also be at risk/ vulnerable when in a relationship (social or work) with another who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them
  3. An adult may also be at risk if their decision-making capacity is impaired and/or they do not have the support to make a decision.
- **Assent-** It is the agreement of someone not able to give legal consent to participate in the activity. For example, work with children not capable of giving consent requires the consent of the parent or legal guardian and the assent of the child.
- **Assisted Decision making** - This is assisting or supporting an individual to make a decision on their own by giving them the tools they need, rather than making the decision for them. This is also where when a person whose capacity to make a decision is in question, they appoint a person to assist or co-decide. It is also when somebody has appointed another to represent them for the purpose of making a decision.



- **Child Abuse-** Child abuse consists of anything that individuals, institutions or processes do or fail to do that directly or indirectly harms children or reduces their prospect of safe and healthy development into adulthood.
- **Child Protection-** Child programmes, projects and advocacy measures designed to protection is a programming approach involving prevent and respond to abuse, exploitation, neglect and violence against children. It generally focuses on risks and issues caused externally to the organisation, while safeguarding focuses on those caused internally.
- **Confidentiality-** For the purposes of this policy, confidentiality means that information about each incident will only be shared on a need-to-know basis.
- **Free and Informed Consent-** The voluntary agreement of an individual who has the capacity to give consent, and who exercises free and informed choice.

*\*Note on Legal Capacity- In accordance with Article 12 of the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), SAHAYOG recognizes that persons with disabilities have the right to recognition as persons before the law and to enjoy legal capacity on an equal basis with others in all aspects of life.*

- **Risk-** Risk means the potential for something to go wrong (an incident or an accident), or the likelihood of a negative consequence to an action.
- **Risk Assessment-** Risk assessment is a means of identifying potential risks.
- **Risk background -** SAHAYOG works in a range of development and humanitarian contexts in which women, men, girls and boys with disability can be at higher risk than the general population. It notes with concern that children with disabilities are more than three times more likely to be abused than children without disabilities. Adults with disabilities – especially women – are also highly vulnerable to experiencing abuse if safeguards are not in place.

### Updated Terminology (2025 Correction)

- **“Safeguarding”** refers to internal organizational responsibilities to prevent harm caused by staff, representatives, or activities.
- **“Protection”** refers to external/systemic threats such as trafficking, violence, or exploitation by non-affiliated individuals or entities.

### Intersectional Vulnerabilities (2025 Addition)

SAHAYOG acknowledges that children and adults-at-risk may face intersectional vulnerabilities based on gender, caste, class, disability, gender identity, or sexual orientation. The organization shall ensure tailored protection strategies to uphold their dignity and safety.



## **2. ABOUT SAHAYOG**

SAHAYOG, a nonprofit voluntary organization, has been operating with the mission of promoting sustainable participatory rural development since being founded in 1992. SAHAYOG works with Human Rights Based Approaches to Promote Gender Equality and the Rights of Marginalised Women and Youth. SAHAYOG has a vision of creating a space for those engaged in effective advocacy for human rights, towards building a society where marginalized groups and individuals raise their voices to claim equal human rights.

SAHAYOG believes that every child and adult have the right to protection and to live in 'safe environments', regardless of gender, ethnicity, political association, religion, sexual orientation and whether or not they have a disability. It is SAHAYOG's responsibility to make sure that all children and adults who come into contact with SAHAYOG's development and humanitarian programming are safeguarded to the greatest extent possible.

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## **3. PURPOSE**

SAHAYOG recognizes the right of children and vulnerable adults to protection, regardless of gender, race, culture and disability. SAHAYOG recognizes the power dynamics inherent in working with children and Vulnerable adults and the potential for abuse and exploitation by staff of people we work with. SAHAYOG is committed to creating and maintaining an environment which promotes its core values, principals and prevents abuse and exploitation of all people. SAHAYOG staff and associates are expected to uphold the dignity of all people with whom they come into contact by ensuring that their personal and professional conduct is of the highest standards at all times. They are equally expected to serve with integrity and promote the right relationships while taking their responsibilities. SAHAYOG recognizes the unique needs of children and vulnerable adults and, therefore, commits itself to creating and maintaining an environment that protects these individuals.

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## **4. WHO THIS POLICY APPLIES TO**

This safeguarding policy is a mandatory policy that applies to all SAHAYOG staff and others like consultants, contractors, CBOs, board members, project visitors, interns and volunteers (hereafter referred to as SAHAYOG Representatives).

SAHAYOG works very closely with and via partners and expects partners to uphold high standards of safeguarding based on the UN Convention on the Rights of the Child and the UN Convention on the Rights of Persons with Disabilities.



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## 5. ADAPTATION

While this is a global policy, where necessary, the policy and its appendices can be contextualized by SAHAYOG entities to fit the local legal and cultural context, without diluting it. Any adaptations besides language translations will be in consultation with the global Safeguarding Manager, who will facilitate internal mechanisms for approval of the adaptations.

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## 6. WORKING WITH PARTNERS

Safeguarding is an integral part of SAHAYOG's partnership commitment and SAHAYOG expects its partners to either have or to develop within an agreed timeframe a safeguarding policy or have similar arrangements, **SAHAYOG also expects the following from partners:**

1. All partners and sub-partners should develop inclusive and child-friendly (if working with children) approaches to programming for all stakeholders. This includes development of feedback mechanisms that are child-friendly (if working with children) and accessible.
2. Women, men, girls and boys should be actively and meaningfully encouraged to participate in the design, monitoring and evaluation of activities that affect them.
3. Inform girls, boys, women and men involved in their programmes and operations how they can report safeguarding concerns and the follow-up actions that will be taken.
4. Partners' program managers should ensure safeguarding risks of programs are assessed and managed.
5. If a serious safeguarding incident (abuse, neglect or exploitation) occurs within a partner organization:
  - SAHAYOG expects to be informed at the earliest possible time via the Safeguarding Focal Person, about the non-confidential details of the incident, and the partner's response. Responses may include medical, psychological and legal measures taken in the interest of the concerned child (ren) or adults; investigation of the incident; preventive measures or measures taken by/with the family and community.
  - SAHAYOG will offer advice or refer to local expertise if requested by the partner to do so.
  - Should the partner not take appropriate and timely action or ignore the incident, SAHAYOG will offer recommendations. As a last resort, SAHAYOG reserves the right



to withhold funds from the partner until appropriate measures are taken or to end the partnership contract.

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## **7. SAFER RECRUITMENT AND CONTRACTING**

In order to reduce safeguarding risks caused by SAHAYOG staff, the following recruitment procedures will apply. Although not 100% sufficient in themselves, taken together they help provide reasonable assurance that attempts have been made to recruit suitable persons and hence reduce risks to children and adults who come into contact with SAHAYOG.

1. All SAHAYOG job advertisements state that 'SAHAYOG is committed to safeguarding children and adults-at-risk'.
2. Candidates will have their identity checked against original documents.
3. Candidates will have their employment history checked, including an inquiry of any gaps between jobs.
4. Candidates will be asked specific safeguarding related questions during their interview.
5. SAHAYOG will ask for references from a previous employer. If this is not possible, an academic reference or appropriate, respectable community contact who can provide a reference. Where staff will be working directly with children or adults-at-risk or if recruitment is done within the European Union, verbal references must be sought.

Note that a criminal record is not an automatic disqualification to work for SAHAYOG. The Human Resources Manager in consultation with a senior manager can decide whether to proceed with the candidate's appointment, depending on the nature of crime. When in doubt, do not appoint the candidate.

7. All candidates must sign SAHAYOG's Code of Conduct and Safeguarding Behaviour Code upon appointment.
8. Respective Human Resource managers will ensure that the new recruit receives an induction in safeguarding within one (1) month and no later than three (3) months after appointment.

*Consultants, suppliers and contractors*



1. Before contracting, the project manager must ensure that all consultants, suppliers, contractors and sub-partners receive information or briefings on the Safeguarding Policy and their obligations under it.
2. All contracts should include a clause stating that the party being hired will adhere to SAHAYOG safeguarding policies and procedures and to SAHAYOG's Code of Conduct.

### **Mandatory Police Verification (2025 Addition)**

All SAHAYOG staff, consultants, and representatives with access to children or vulnerable adults shall undergo mandatory police verification and, where applicable, be checked against the National Sex Offender Registry prior to engagement.

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## **8. RESPONSIVE ACTION**

Incident management processes will be as accessible as possible and specific to the needs of those concerned. Safe guarding Focal Persons shall ensure that each partner has a local safeguarding resource and referral list that is updated at least annually.

### *Managing disclosures by children or adults*

It is likely that a SAHAYOG staff member or representative may witness or become aware of abuse, neglect and or exploitation. Below is some guidance on how to handle this.

1. Always take the allegation seriously and pay attention to the details reported.
2. Do not promise to keep the information they provide secret because you will need to inform the safeguarding focal person and those involved with investigating the incident if an investigation is instigated.
3. Under no circumstances should you try to investigate the allegation yourself. Instead, pass this information on to the Safeguarding Focal Person.

### *Reporting concerns and incidents of abuse*

Below are the options by which safeguarding related notifications can reach SAHAYOG's Steering Committee. This does not negate the duty to report incidents to local authorities where needed.

1. Notify the nearest Safeguarding Focal Person.
2. You can also notify Safeguarding Focal Person by mail (the mail is [safeguarding@SAHAYOG.org](mailto:safeguarding@SAHAYOG.org))





3. Report via the anonymous whistle-blower mechanism on SAHAYOG's website
4. Use SAHAYOG's dispute resolution process, which is an internal mechanism only for SAHAYOG staff.

*If you are emailing a safeguarding incident to a Safeguarding Focal, follow these procedures:*

1. Mark the email as 'Urgent' and set it as 'High Importance'.
2. The subject line should read: **ATTENTION! Confidential!**

There will be no action taken against anyone who reports a concern in good faith that, following investigation, proves unfounded. However, if a SAHAYOG representative knowingly and willfully reports information with malicious intent, this will lead to disciplinary action.

All safeguarding notifications will be treated and managed with confidentiality to protect the identity of those concerned, in accordance with the national laws as applicable.

### **Survivor-Centric Recovery & Legal Referral Protocols (2025 Addition)**

SAHAYOG shall ensure legal aid, trauma-informed counselling, and medical referrals for all survivors, and proactively register FIRs where mandated under POCSO, JJ Act, or IPC. Staff shall not negotiate or mediate cases internally where a legal crime has occurred.

### **Emergency Medical Aid Mandate (2025 Addition)**

Any SAHAYOG personnel aware of physical/sexual abuse must ensure immediate medical assistance within 24 hours and report to the police within the time prescribed under Indian law.

### **Anonymous Reporting Protection (2025 Addition)**

Anonymous complaints made in good faith shall be permitted and investigated with equal seriousness, subject to the presence of verifiable indicators or corroborating information.

### **Child-Friendly and Disability-Inclusive Complaint Mechanism (2025 Addition)**

All SAHAYOG program sites shall establish visually accessible, child-friendly, and disability-sensitive mechanisms for reporting safeguarding concerns. This includes posters, suggestion boxes, helpline numbers, braille leaflets, and local language signage.

### **Consent Clarification and Digital Data Protection (2025 Addition)**

- Consent can be withdrawn at any time by the subject or legal guardian, and data shall be deleted accordingly from SAHAYOG's systems.



- SAHAYOG shall not share identifiable information with third parties (e.g., media, sponsors) without a new round of informed consent.
- Digital consent records will be encrypted and access-controlled, in compliance with the Digital Personal Data Protection Act, 2023.

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## **9. INCIDENT MANAGEMENT DUTIES AND SAFEGUARDING FOCAL PERSON RESPONSIBILITIES**

Below are steps to facilitate timely and appropriate incident management once a safeguarding notification has reached SAHAYOG.

1. On receiving an incident notification, the Safeguarding Focal will convene a meeting within 24 to 48 hours. Note that sexual and physical abuse incidents need immediate action due to specific medical and legal procedures needed.

2. The Safeguarding Committee will consider the following questions:

- Does the matter breach organisational policy or local laws?
- Does it require further enquiry? If yes, appoint and delegate an administrative investigation<sup>19</sup> team with clear terms of reference<sup>20</sup>.
  - With more information, complaints or allegations may be substantiated, refuted or unsubstantiated. The resulting relevant outcomes may include retraining and/or disciplinary action for substantiated complaints depending on the seriousness of the offence.
- Does this require reporting to the police or any other authority?
- What 'victim support services' do the survivor(s) and their family need? Can these services be provided directly or through referral?
- Is this incident management process accessible for those involved to participate?
- What lessons does our organisation learnt from this incident?

3. Note that the safeguarding focal person keeps written records of the incidents management and shares this information with the Board members, who then keeps the corresponding SAHAYOG team informed.

4. In cases of very serious or complex incidents, SAHAYOG's Board members may contact an advisory team who will be called upon by the Safeguarding Manager.



5. At resolution of the incident, key stakeholders are informed of the outcomes as appropriate.

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### **10. SURVIVOR SUPPORT**

It is acknowledged that individuals or groups of survivors of safeguarding violations may need specific interventions to facilitate their wellbeing.

SAHAYOG will take the necessary steps within the resources available to promote their welfare and safety. This may include facilitation of or referrals to competent service providers in the area of medical, psychosocial, legal or other support services required by the survivor(s) and, if needed, their caregiver(s). They will also receive appropriate information regarding the outcomes of any incident management procedures.

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### **11. APPENDICES-**

- Incident Reporting format
- Consent form
- Incident Management Flowchart
- More definitions

### **INCIDENT REPORTING FORMAT**

Send your email to: your Safeguarding Focal Person (safeguarding@SAHAYOG.org)

E-mail Subject: 'ATTENTION: Confidential!'

Note: The information contained in this form is confidential.

This form is for reporting concerns about potential violations of SAHAYOG's Child and Adults-at-risk Safeguarding Policy and Code of Conduct.

It should only be sent to your local Safeguarding Focal Person or SAHAYOG's Global Safeguarding Manager. Please try to provide as much information as possible in the form. Areas where you have nothing to report can be left blank.

1. Details of person reporting concern



(unless they want to remain anonymous)

Name:

Location:

Contact telephone:

Relationship to child(ren) or adult(s)-at-risk:

2. Administrative information related to the incident

Applicable SAHAYOG Office:

Partner name if applicable:

Project Number:

Funding MA(s):

3. Type of safeguarding concern or abuse

(Please check appropriate boxe(s))

Physical

Sexual

Emotional

Neglect/Negligence

Economic and other exploitation

Breach of SAHAYOG policy and Code of Conduct

4. Victim's details

Name<sup>26</sup> (no need for victim's name if the case is at a SAHAYOG partner):

Age range if known:

Gender:



Health issue or impairment if known and applicable:

5. Location of incident

Further details of concern or incident (including victim's direct words if possible):

Who, what, where, when?

6. What action (if any) has already been taken  
and by who?

7. If emergency medical<sup>27</sup> care is required,  
has it been accessed?

Yes/No

8. Have any referrals or external entities/stakeholders been informed of this incident?

Report written by:

Name:

Position and location:

Signature (on hard copy):

Date:

Submitted to:

Date submitted:



**CONSENT FORM**

Guidelines on obtaining consent

**Age of person-** Consent of parents/guardians

**Child age 0 – 16-** Consent of Parents/guardians needed. Observe for children's willingness to participate.

**Child above age 16 but below age 18-** Both child and parents/guardians can consent.

**Adult (any person 18 years and above)-** Adults can consent on their own. However, in some cases, assisted decision making may be needed.

*Some Details of Person*

Name of person

Age

Country / Location

SAHAYOG Project/Partner

Date

1. I agree to a SAHAYOG Representative:

Speaking to me and recoding my words

Making a video of me

Taking photos of me

2. I agree for SAHAYOG to:

Mention my name

Mention what country I am from

Use Photographs and/or videos of me

Use information about myself, family, and community to form stories

Use information about my potential disease/medical treatment, my impairment or disability



3. I understand that the information, photos and/or videos as mentioned above will be used on a voluntary basis (no payment will be received) for the purposes of fundraising, awareness raising, advocacy and other communications with our sponsors, media or the public. They will be used in printed products, electronically as well as online (SAHAYOG websites, social media, e-mail etc) or for broadcast. I understand that I can revoke my consent at any time with future effect. After revocation, the information will be deleted from the data base, but might continue to be accessible if the data has been used by other parties.

*Name of person giving consenting:*

Relationship to child if consenting on behalf of a child:

Location:

Date:

Signature/thumb-print:

*Declaration of translator or person helping with assisted decision making:*

I have translated and or explained the contents of this form into a language understood to the persons concerned. I didn't notice any signs that the contents of the forms may not have been fully understood by the person I am assisting.

I collected the consent with respect to the SAHAYOG Code of Conduct.

Name:

Organisation (if applicable):

Date:

Signature/thumb-print:

*Declaration of person collecting consent:*

I collected the consent with respect to the SAHAYOG Safeguarding Policy requirements.

Name:

Organisation:

Date:

Signature/thumb-print:



**INCIDENT MANAGEMENT FLOW CHART**

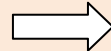
Possible abuse by SAHAYOG staff, representative or partner



Inform your local safeguarding Focal person immediately (within 24 hours)



Safeguarding person informs Steering Committee members within 24 to 48 hrs



Committee carries out initial assessment

Provide directly or via  
referral accessible support



Information gathering.

information gathering (or instigate to survivors in relation to incident.)



Based on information received, draws conclusions and make recommendations to management.



- If the suspected violation is criminal, committee informs local authorities unless there are significant risks involved with this (and committee has management approval not to report). However, other internal disciplinary action must be taken e.g. dismissal.  
OR
- If complaint is substantiated/ proven, depending on gravity, outcomes may include:

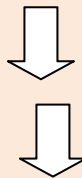




**disciplinary action for perpetrator, possible referral to authorities, training/ monitoring/ shadowing (to address poor practice), risk assessment (of risks inherent in the post). other management implications (e.g. policy or procedure changes).**

**OR**

- **If complaint is unsubstantiated/ unproven, outcomes may include: support to alleged perpetrator(s) and staff; training/ monitoring/ shadowing (to address poor practice); risk assessment (of risks inherent in post); other management implications (e.g. policy or procedure changes).**



On a need-to-know basis, inform persons involved of the outcomes.

This includes appropriate feedback to the complainant, victim, witnesses, community, and staff team as necessary.



### **MORE DEFINITIONS**

- **Types of Abuse**

- **Physical abuse** involves the use of violent physical force to cause actual or likely physical injury or suffering, (e.g. hitting, shaking, burning, female genital mutilation, torture.)
- **Emotional or psychological abuse** includes humiliating and degrading treatment such as name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
- **Sexual abuse** includes all forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery.
- Child sexual abuse may also include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.
- **Neglect:** a child or adult can be neglected when there is failure to protect them from harm when in a position to do so. **Child neglect** is deliberately not meeting the child's basic needs.

- **Grooming/online grooming**

When someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

- **Sexual Exploitation**

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

- **Sexual Exploitation of a Child**

CBM believes that:

- sexual activity with a child with or without their consent is child abuse e.g. rape, indecent assault;
- consensual sexual activity with a child over the legal age of consent of the country in which she/he lives and/or in which the offence occurs, but below 18 years (although not a crime) will be dealt with as a breach of CBM's Safeguarding Policy and the Code of Conduct.

- **Harmful Traditional Practices**

Practices that are accepted, and often expected, by certain cultures and communities but are harmful to children or adults. Examples include: Physical and humiliating punishment; female genital mutilation / cutting, early and forced marriage, and child/forced labour among others.



- **Child Labour**

Child labour is work that is likely to be hazardous; interferes with the child's education; is harmful to the child's health or physical, mental, spiritual, moral or social development, is mentally, physically, socially or morally dangerous and harmful to children, and interferes with their schooling by:

- depriving them of the opportunity to attend school;
- obliging them to leave school prematurely; or
- requiring them to attempt to combine school attendance with excessively long and heavy work

- **Female Genital Mutilation / Cutting**

Female Genital Mutilation (FGM) is internationally recognized as gender-specific abuse. It may involve:

- partial or total removal of the external female genitalia
- stitching of the vaginal opening
- non-cutting procedures such as pricking, piercing and burning

The procedure carries very serious physical and mental health risks for girls and women and can lead to complications in pregnancy and childbirth.

- **Early and Child Marriage**

Early and child marriage is commonly understood to mean marriage under the age of 18 years. Early and child marriage often deprives girls in particular of their education and options in life and leaves them vulnerable to abuse, sexually transmitted infections and problems associated with early pregnancy.

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Reviewed and revised by- Gul Srivastava

Date- June, 2025

Approved by- Secretary, Sahayog