

### Child Protection Policy

Navnirmity Eduquality Foundation (NEF) is registered under Section 8 of the Companies Act, 2013, bearing Registration No. U80904MH2013NPL243158 having its registered office at 3rd Floor, Priyadarshini Hsg Society, Padmavati Road, IIT Market, Powai, Mumbai, Maharashtra 400076.

NEF was established in 2013 to provide quality education. NEF has collaborated with Anganwadis, government bodies, and private educational institutions to integrate innovative teaching methods into their daily processes, enhancing learning and knowledge retention. Our primary focus areas are Early Childhood Education (ECE), Mathematics, and STEM.

NEF is committed to safeguarding all children in our care from abuse, neglect, exploitation, and harm and hence has developed the Child Protection Policy.

This Child Protection Policy (CPP) aligns with the Bharatiya Nyaya Sanhita (BNS), Protection of Children from Sexual Offences Act 2012; Child Labour [Prohibition and Regulation] Act 1986; Juvenile Justice [Care and Protection of Children] Act 2015; Right of Children to Free and Compulsory Education Act 2009 and international child protection standards.

In the event that any part of this policy is contrary to any law(s) in force, such part shall be deemed to be null and void.

In the event this policy doesn't cover any legal compliance requirement on the subject of child protection, the same shall be deemed to be a part of this policy, and the Organisation shall be duty-bound to follow the same.

**This Child Protection Policy has been approved by NEF Board and is effective from 1st April 2025.**

### Objective

The objective of the Child Protection Policy is to educate about what conduct constitutes child abuse, the ways and means the Organisation shall adopt to prevent the occurrence of any such abuse, and in the event of such an occurrence, to enable a fair mechanism to deal with such conduct.

- a. **Ensure Safety and Well-being:** To create a safe and secure environment for children, free from any form of abuse, exploitation, neglect, and discrimination, while promoting their dignity and welfare.
- b. **Establish Clear Guidelines and Procedures:** To implement a strict code of conduct, along with clear procedures and guidelines, for our team to follow in preventing, identifying, and addressing any incidents of child abuse or exploitation.
- c. **Promote Accountability and Responsibility:** To designate specific responsibilities to our team, ensuring that they are accountable for safeguarding children and reporting any cases of abuse, exploitation, or neglect within the organisation.

### Definitions

- a. **Child:** This Policy applies to all children below the age of 18 years who come in direct or indirect contact with the Organisation
- b. **Workplace:** This Policy applies to all the organisation's offices and branches, any location or other place where the organisation carries out its activities, including trips and social events. It includes all forms of electronic communication and virtual or online platforms, including emails, online meetings, chat rooms, and digital chatbots etc
- c. **Team:** This Policy applies to all persons (hereinafter collectively referred to as Team) who are connected to the Organisation, including Board members, Management, Donors, Permanent, Temporary and Contract Staff. This includes any person employed, whether full time, part time or occasional; whether paid a salary, fee or honorarium or providing free services. (Volunteers, Consultants, Service Providers, Fellows, Trainers, interns, visitors, vendors, parent experts, clients, and such.
- d. **Child Victim:** Any child who has been subjected to any act of child abuse.
- e. **Child Abuse:** Encompasses all forms of physical and emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, and commercial or other forms of exploitation, as described in **Annexure 8**.
- f. **Complainant:** Any child or guardian of the child can make a complaint directly to the Child Protection Committee.
- g. **Complaint:** Any allegation made in writing to the Child Protection Committee.
- h. **Child Abuser / Respondent:** Any team member above the age of 18 years against whom the child victim has complained. Respondent can be any third-party person who is external to the organisation. Respondent can also include peer abuse committed by children on other children who come in direct or indirect contact with the Organisation.
- a. **Child Friendly** The process and interpretation, attitude, environment and treatment that is humane, considerate and in the best interest of the child, ensuring their safety and dignity.
- b. **Best interest of the child.** In all actions, processes and decisions taken regarding a child, the best interest of that child shall be of paramount consideration, This encompasses

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behaviour that ensures the physical, emotional, intellectual, social and moral development of the child.

- c. **Child Protection** is defined as the responsibilities, measures and activities that are undertaken to safeguard children from both intentional and unintentional harm. Preventing and responding to violence, exploitation and abuse against children.
- d. **Child Protection Committee:** A committee constituted to ensure the prevention and prohibition of child abuse. Also, to ensure that the redressal of child abuse cases is dealt with appropriately, sensitively and expeditiously.
- e. **Management:** Management includes the person(s), board or committee responsible for the formulation and administration of policies for the organisation.

### Child Protection Committee (CPC)

- a. The CPC consists of members nominated by the Management by order.
- b. One-half of the total members shall be women and senior team members.
- c. The Chairperson of the CPC shall be a senior woman team member.
- d. No CPC member shall have a proven complaint of child abuse against them.
- e. A CPC member shall hold office for a period not exceeding 3 years from the date of nomination.
- f. A CPC member shall report any conflict of interest in the case immediately to the Management.
- g. The Chairperson of the CPC will be responsible for convening meetings.
- h. A quorum of at least 2 members is required for the proceedings to take place.
- i. Any member of the CPC can request to conduct an emergency meeting by giving 48 hours' notice.

### Role of CPC

**Preventive:** To make recommendations to the Management to organise and arrange regular orientations, awareness drives, workshops and training programmes for all the employees.

**Remedial:** To take notice of complaints of child abuse, conduct enquiries, and assist a complainant. To redress complaints of child abuse and make interim and final recommendations to the Management. To follow up with Management on the action taken on the recommendation and monitor the same.

**Administrative:** To meet quarterly, even if there is no live case, and to review the Organisation's preparedness to fulfil all requirements under the Policy. To monitor the implementation and progress done to date. To record minutes of every meeting.

### Complaint Mechanism

**Reporting a Complaint** All abuse or suspicion of abuse must be reported to the CPC immediately in the following manner :

- a. Complaints can be sent by email, phone call, registered post, or handed over in person to any CPC member.
- b. Complaints can also be made in the special complaint boxes that will be placed at appropriate places within the Organisation.
- c. Anonymous complaints can also be brought to the CPC.
- d. The CPC can take suo-motuo cognisance if they are aware of any child abuse.
- e. If for any reason, the complainant requests, the CPC members shall render all reasonable assistance to draft a complaint based on the descriptions provided by the complainant.
- f. The CPC shall make attempts to ensure that the complaint is submitted along with supporting documents, if any, and the names and contact details of witnesses, if any.
- g. Annexure contains a sample draft of a complaint.

### Inquiry Procedure

On receipt of a complaint, the CPC shall meet immediately but not later than 24 hours to determine the further action in the inquiry. They shall record the details of the case in a Complaint Register (soft copy) bearing the date of opening of the case. Annexure 7.

### In Cases with Penal Implications (Criminal Offenses)

- a. Where the abuse constitutes a penal offence, the CPC shall report the matter to the concerned law enforcement agency.
- b. If the CPC feels the need for a legal opinion, they shall obtain the same. If the legal opinion confirms that the abuse constitutes a penal offence, the CPC shall report the matter to the concerned law enforcement agency.
- c. The CPC shall report the matter even though the complainant and/or the child victim is not desirous of reporting the matter
- d. The CPC shall ensure no internal compromise (e.g., mediation) in criminal cases.

- e. The CPC shall cooperate with the concerned law enforcement agencies, including giving evidence such as providing CCTV footage, other electronic evidence, giving statements, handing over relevant documents, etc., as and when requested/directed by the law enforcement agencies in writing and in accordance with the law.
- f. Appropriate law enforcement agencies to report to - Child Welfare Committee, Police, Childline 1098, Child Rights Commission,

**Action against child abuser/Respondent in Penal Cases** Where the abuse constitutes a penal offence, under BNS/POCSO/JJ Act:

- a. If the child abuser/respondent is a team member, Immediate Suspension / Removal pending investigation. If convicted, termination of employment. If acquitted, reintegration with sensitivity (e.g., monitored interactions).
- b. If the abuser is a peer: Separated from the victim (e.g., class/activity changes). If convicted, expulsion and blacklisting. If acquitted, reintegration with sensitivity (e.g., monitored interactions).

**In cases with Non-Penal Provisions (Requiring Intervention but Not Criminal Action)**

- a. Where the abuse constitutes a non-penal offence, the CPC shall conduct an assessment within a period not later than 7 working days.
- b. This could involve meeting the child abuser/respondent and other witnesses.
- c. The CPC shall proceed with the inquiry and shall arrive at a finding irrespective of whether the complainant wishes to withdraw the same or the complainant and/or the Respondent fails to cooperate with the inquiry.

**Action against child abuser/Respondent in non-Penal Cases**

Where the abuse constitutes a non-penal offence upon completion of inquiry proceedings, the CPC shall make recommendations to the Management for further action against the child abuser/Respondent as per Annexure B

### Interim Relief for the Child

The CPC shall provide Immediate support to the child, including:

- a. Safety: Remove the child from contact with the accused (e.g., temporary relocation, adjusted schedules).
- b. Medical Care: Arrange emergency medical care if needed.
- c. Counselling: Provide trauma-informed counseling through certified professionals.
- d. Legal Aid: Appoint a support person/advocate to guide the child/family through legal processes.
- e. Confidentiality: Protect the child's identity (no public disclosure; use pseudonyms in records).

### Powers of the CPC

- a. The CPC can summon any person or request the discovery and production of documents related to the inquiry.
- b. The CPC shall proceed with the inquiry ex parte if either the complainant and/or the respondent fails to present themselves during the proceedings
- c. The CPC may terminate the inquiry proceedings if it deems it necessary by providing reasons in writing.

### Dos and Don'ts for CPC Members

The CPC must balance its assessment with sensitivity, ensuring neither the child nor the Respondent face unnecessary trauma during the inquiry. All actions should prioritize child safety while maintaining procedural fairness.

- a. Child-Centered Approach: Always ask the child who they want present during discussions and honor their choice of a trusted support person. Conduct all child interactions in a child-friendly manner using age-appropriate language.
- b. Thorough Assessment: Examine all relevant witnesses, including the complainant, and any relevant individuals. Document all statements in writing with proper signatures. Preserve all evidence (electronic records, medical reports, CCTV footage).

- c. Fair Process: Provide written notice of allegations to the accused with opportunity to respond.
- d. The CPC shall allow testimony through child-friendly methods (video recording, support person present).
- e. Professional Conduct: Maintain strict confidentiality about all parties involved. Seek expert assistance (psychologists, medical professionals) when needed. Ensure no member with a conflict of interest participates in proceedings.
- f. Follow-up Actions: Liaise with legal authorities in penal cases. Implement monitoring systems to prevent the recurrence of issues. Provide regular updates to relevant stakeholders while maintaining privacy.
- g. Dont - Allow legal practitioners to represent any party during CPC proceedings.  
Permit public shaming or disclosure of identities.  
Let the Respondent interact with children during ongoing investigations.  
Making assumptions without evidence.  
Using intimidating questioning techniques with children.  
Allow any form of mediation in criminal cases.  
No contact between the involved parties during proceedings unless necessary.
- e. Key Principles: Dignity and respect for all parties  
Evidence-based decision making  
Complete transparency in the process (while maintaining confidentiality of details)  
Strict adherence to natural justice principles

### **Confidentiality**

- a. All the complaints received under this Policy shall be kept in the strictest confidence by the CPC and Management
- b. Details of the complainant, names of witnesses and/or any documents shall not be disclosed to any other person, including the press or the media.
- c. If the complainant so desires, then the identity of the complainant shall be kept secret at all times.
- d. No team member who is aware of a complaint and inquiry proceeding, whether a party or not, shall disclose the details of the complaint to any other person.

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- e. Any team member who is found guilty of violating these provisions related to confidentiality may be terminated by the organisation with immediate effect without any compensation whatsoever.
- f. Information may be disseminated regarding actions taken under this Policy without disclosing the name, address, identity, or any other particulars that may lead to the identification of the persons involved.

### Role Of Management

- a. Create and ensure a safe environment that is free of child abuse.
- b. Maintain an atmosphere of equality and respect.
- c. Publicise the policy with the names and contact details of the CPC members at prominent places within the organisation
- d. Prepare an annual report and submit it to the Board. Annexure 4.
- e. Provide administrative and other support to the CPC to enable their functioning, including clerical staff, computer operators, and appropriate infrastructure.
- f. Take action on recommendations made by the CPC and report back to the CPC regarding action taken.
- g. Ensure final findings become part of all recommendation letters issued for the Respondent by the Organisation
- h. Organise and arrange regular orientations, workshops and training programmes for all the team members of the organisation, including members of the CPC.

### Role of Team Members

- a. Do not abuse and/or exploit a child or act/ behave in any way that places a child at risk of harm.
- b. Contribute to an environment where children are respected and encouraged to discuss their concerns and rights.
- c. Report any suspected child abuse and protection concerns to the CPC. This is a mandatory requirement and failure to do so may result in disciplinary action.
- d. Respond to a child who may have been abused or exploited.
- e. Cooperate in any investigation of CPC.

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- f. Be aware that where concerns about child abuse are raised, they will be investigated under this policy either by law enforcement agencies and/or by the organisation's disciplinary procedures. This may result in disciplinary sanctions and/or dismissal of the team member.
- g. If a concern about suspected child abuse is raised, which proves to be unfounded on investigation, no action will be taken against the complainant.
- h. Do not disclose information that identifies families or children, or make it available to the general public.

### Policy Review

- a. This document shall be reviewed annually and altered to be in line with the existing laws.
- b. Such alterations shall be intimated to the team via email as well as uploaded on the website.

This Policy is exclusive to **Navnirmity Eduquality Foundation**. Anybody who selectively or in whole adapts or misappropriates any ideas, portions or any concept from the policy will be causing a breach of terms and conditions in the MOU between **Navnirmity Eduquality Foundation** and Majlis.

**ANNEXURE 1**

**List of Child Protection Committee members as of 1st November 2025**

<b>Name</b>	<b>Designation</b>	<b>Contact Details</b>
Uma Kholgade	Chairperson	9004222396; uma.kholgade@gmail.com
Pooja Kabre	Member	9930035976; pooja@navnirmityeduquality.org
Shambhavi Paswan	Member	9167844102; admin@navnirmityeduquality.org

Legal Consultant - Adv Ms. Audrey Dmello majlislaw@majlislaw.com, 7506732641

## **ANNEXURE 2**

### **Recommendations**

If the child abuser/respondent is a team member:

- a. Written apology to the victim;
- b. Warning, Reprimand or censure to Respondent in writing;
- c. Promotion of the Respondent to be withheld; transfer, demotion, suspension,
- d. Withholding of pay rise or increments of the Respondent;
- e. Terminate the services of the Respondent with immediate effect with or without any compensation;
- f. Compensation to the victim;
- f. Suspend and prohibit the Respondent from entering the premises;
- g. Transfer the Respondent to any other workplace;

If the abuser is a Peer:

- a. Mediation (for peer conflicts).
- b. Monitoring to prevent recurrence.

Any other relief as the CPC may deem fit

**ANNEXURE 3**

**Interim Relief to be provided for the Child**

**Safety:**

Shambhavi Paswan. Admin, 9167844102; admin@navnirmityeduquality.org

**Medical Care:**

Shambhavi Paswan. Admin, 9167844102; admin@navnirmityeduquality.org

**Trauma Counselling:**

Shambhavi Paswan. Admin, 9167844102; admin@navnirmityeduquality.org

**Legal Aid:**

Majlis, Mon-Fri 11 am to 7 pm Official: 7506732641 majlislaw@majlislaw.com

**ANNEXURE 4**

**Child Protection Policy Annual Report for the year (April - March)**

Name of the Organisation	
CPC Members Names	
No. of cases reported	
No. of cases Disposed	
No. of cases pending	
Nature of action taken in cases disposed	
Details of workshops/Awareness programs carried out (Date, No of Attendees etc)	
No. of CPC Meetings	
Signature of CPC Members	
A list of other documents is appended	

## **ANNEXURE 5**

### **Format for making a complaint**

To,

Child Protection Committee

#### **Details of the Complainant:**

Date :

Place :

Name of the Complainant

Name of Victim

Relationship with Organisation

Contact Details Mobile No / Email Id:

#### **Details About the Incident:**

1. Person/people involved in child abuse: [Please provide the full name(s), designation]
2. Incidents: [Please describe each incident with date/s, place/s]
3. Your response to the child abuse if any:
4. The impact of abuse on the child victim:
5. Other material and relevant details: [Kindly provide names of witnesses, any documents or other relevant additional details, if required.]

Signature of the Complainant:

**ANNEXURE 6**

**Child Protection Committee  
Minutes Of Quarterly Meeting**

**Date:** DD/MM/YYYY **Time:** \_\_:\_\_ hrs

**Venue:** office/virtual (call, Zoom, Google Meet etc.)

**Attendees:**

Name of CPC Members and Designation

**Proceedings:**

Overview of the previous meeting:

- a. Number of complaints of CPC received;
- b. Number of complaints disposed of;
- c. Number of cases pending;
- d. Nature of action taken by the Organisation;
- e. Number of workshops or awareness programs carried out

**General discussion:**

**Suggestions:**

Signature of the Committee Chairperson:

**ANNEXURE 7**

**Format for Complaint Register**

<b>Date of Receipt of Complaint</b>	<b>Interim Reliefs Recommended</b>	<b>Final Reliefs / Action Recommended</b>	<b>Date of End of Proceedings</b>

## **ANNEXURE 8**

### **Child Abuse**

Child Abuse encompasses all forms of physical, emotional, and sexual harm, neglect, exploitation, or willful failure to protect a child from harm. It includes acts or omissions that:

Abuse may be a single incident or a pattern of behaviour and can be intentional or unintentional.

Child abuse is categorised as Abuse with Penal Implications (Criminal Offences) and Abuse Without Penal Implications

#### **A. Abuse with Penal Implications (Criminal Offences)**

- Physical Abuse: (BNS 115–118), Criminal intimidation (BNS 125)
- Sexual Abuse: (POCSO Act).
- Severe Neglect: (BNS 89).
- Exploitation: Trafficking (BNS 142), forced labour, or cyber exploitation (BNS 356–357).
- Cyber Offences: Cyberbullying, stalking, or sharing explicit images (BNS 356–357).
- Peer-to-Peer Abuse: Bullying, ragging, sexual abuse, or physical violence between children.

#### **B. Abuse Without Penal Implications (Non-Criminal but Requiring Intervention)**

- Emotional abuse (belittling, humiliation, rejection, isolation).
- Mild neglect (occasional lack of supervision).
- Peer-to-Peer Abuse
- Institutional failures (poor safeguarding policies).
- Non-Criminal Sexual Misconduct: Age-inappropriate discussions without physical contact.

Child abuse includes, but is not limited to:

**Physical abuse** may involve hitting, punching, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing intentional physical harm to a child. (These symptoms could also indicate harm to self, such as, cutting and suicide ideation).

**Emotional abuse** is the persistent emotional ill-treatment of a child to cause severe and adverse effects on a child's emotional development. It may involve: conveying to children that they are worthless or unloved; that they are inadequate or valued only insofar as they meet the needs of another person; imposing age or developmentally inappropriate expectations on children; causing children frequently to feel frightened; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may also occur alone.

**Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (i.e. rape) or non-penetrative acts. They may include non-contact activities, such as involving children in the production or viewing of pornographic material or encouraging children to behave in sexually inappropriate ways. Children involved in commercial sex work are victims of sexual abuse, whether they perceive themselves as victims or not.

**Neglect** is the persistent failure to meet a child's basic physical or physiological needs, likely to result in serious impairment of the child's health or development.

**Bullying** is defined as the repetitive and intentional use of power or aggression, whether verbal, physical, or psychological, to harm, intimidate, or isolate an individual or group. It can occur in various forms, including physical, verbal, social, and cyberbullying.