

## SAFEGUARDING POLICY FOR CHILDREN & VULNERABLE ADULTS 2026-29

### (APPROVED BY GC DATED 25<sup>TH</sup> JULY 2026)

|                                                 |                     |
|-------------------------------------------------|---------------------|
| <b>Name of the Policy</b>                       | Safeguarding Policy |
| <b>Date of Formal Approval and Notification</b> | 2026                |
| <b>Holder of the Policy</b>                     | Program team        |
| <b>Date of Next Review</b>                      | 2029                |

#### 1. ABOUT MOBILE CRECHES: PROVIDES HOLISTIC SERVICES TO GIVE CHILD A HEAD START

Mobile Creches (MC) came into being at a construction site in 1969 to provide nurturing care to children of migrant and construction workers. It has grown into an organization that is recognized today for its knowledge in Early Childhood Development (ECD) and child care practices, gained from decades of work with children, engagement with parents, communities, academia, businesses, sustained training of diverse stakeholders and working closely with state governments for better service delivery and policies for the young child in India. MC has a comprehensive approach that combines *health, nutrition, education, parenting* support in a *safe and caring environment* for disadvantaged children from 6 months old to 12 to 14 years. This sets off children on an irreversible path to transform their lives.

- MC has impacted over 1 million children, 20,000+ caregivers, 500+ employers, supporting 5000+ creches and day-care centers.
- Aims to reach half a million children, one million parents and community members, and ensure childcare as a public provision in 3 Indian states by 2027.
- MC implements directly with children and also supports its partners in running Child Care Services.

#### 2. PURPOSE OF THE POLICY

Safeguarding refers to measures undertaken by MC, including policies, systems, procedures and practices that ensure the well-being and safety of children, women and adults in all organizational operations. This includes:

01

MC has systems and procedures that ensure safety and wellbeing of children. All staff, board, contractors, visitors, and volunteers are trained.

02

There is Risk Awareness in all staff to consistently minimizes any risk to children and promote a protective environment.

03

Robust reporting and redressal process in place for cases of harm or likelihood of harm.

04

Children who face harm/ abuse are supported by MC. Further, poor practices are taken seriously and addressed.

MC works with young children from most marginalized communities from urban slums, work sites and rural areas who are highly vulnerable. The policy is a measure of the MC's accountability towards the safety of these children by ensuring all staff have risk awareness and ensure safeguarding in all their work. The purpose of this policy is to ensure well-being and protection of children and vulnerable adults who come under the scope of MC's work. The policy is an expression of commitment, proactive systems and actions it would undertake to minimize the risk of harm/abuse to children that may be caused due to their 'coming into contact' with MC. This includes harm arising from:

- *The conduct of staff for personnel associated with Mobile Creches*
- *Mobile creches infrastructure and spaces*
- *The design and implementation of Mobile Creches programs and activities*

**The policy also covers the well-being and protection of staff while they are travelling for the purpose of work, especially the risk they face while on the field. The measures of staff safeguarding are referred to in Annexure 14**

### 3. SCOPE AND APPLICABILITY OF THE POLICY

The scope of the policy is to create a safe and protective environment for children and vulnerable adults

#### 3.1. The Policy is applicable for

|                                                                                                                             |                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>All Trustees and board members, senior management and employees</b>                                                      | Fully Applicable to them and referred to in their Employment Letter                                       |
| <b>Associates include Contractors, vendors, and research agencies hired</b>                                                 | Fully applicable for the period of work with Mobile Creche.                                               |
| <b>It also includes Paid / unpaid interns, researchers and volunteers, trainers and consultants working on behalf of MC</b> | It shall be mentioned in their agreement / vendor contract/ letter of internship etc. <b>Annexure 12</b>  |
| <b>Visitors include journalists, donors, parents, community members, government officials and other stakeholders.</b>       | All preventive measures applicable to them and visitor guidelines shall be shared. <b>Annexure 4</b>      |
| <b>Partner organizations, especially those running MC model centers.</b>                                                    | This policy or partner safeguarding policy approved by MC applicable. Formal Agreement to refer the same. |

#### 3.2. The policy broadly defines the responsibility and accountability of MC in different context of safeguarding violations:

|                                                                                                            |                                                                                                                                                  |
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| <b>Safeguarding Violation at MC Centers</b>                                                                | Prevention, Detection, Reporting by staff and community, Reporting to Authorities, Survivor support and Redressal at organizational level by MC. |
| <b>Safeguarding Violation with a child (attending MC center) but not in MC space or due to MC employee</b> | MC shall extend Survivor support. Senior Leadership Team (SLT) to decide course of other actions on a case-to-case basis                         |
| <b>Safeguarding Violation by MC Employee/ associate outside of working hours.</b>                          | SLT to decide MC's role and position on a case-to-case basis.                                                                                    |

**This policy does not cover Sexual harassment in the workplace – this is dealt with under Mobile Creches' Policy on the POSH.**

## DEFINITIONS

**Child:** A child means every person below the age of eighteen years as defined under the 1989 United Nations Convention on the Rights of the Child (UNCRC) and-The Juvenile Justice (Care and Protection of Children) Act 2015.

**Abuse and Maltreatment:** For this policy MC adopts the definition given by World Health Organization (WHO), (2002) According to WHO “child abuse” and “maltreatment” are ‘all forms of physical and emotional ill-treatment, sexual abuse, neglect or negligence 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.’

**SAFEGUARDING VIOLATIONS** in the context of this policy amounts to:

- Any act of disrespect, discrimination, neglect, exploitation, emotional, physical or sexual abuse or harm, intimidation, bullying, violence, or humiliation to a child, woman or adult community member.
- An act that puts a person at risk of harm or abuse or increases the risk of harm or abuse.
- A failure to act in a situation where a person is at risk of being abused/ harmed or is being abused/ harmed.
- Failure to follow this policy and the code of conduct of the organization/ for working with children.

**Adult at Risk:** This refers to the marginalized and vulnerable members of the community with which MC works. Such vulnerability may be arising from a range of reasons including gender, physical or mental challenge, age, survivor of abuse, socioeconomic deprivation etc. This also applies to MC employees who interact with and work within these communities.

**Best Interest of the Child:** Means the basis of any decision taken regarding the child, to ensure fulfilment of basic rights and needs, identity, social well-being and physical, emotional and intellectual development. (Juvenile Justice (care and protection of children) Act).

**Senior Leadership Team (SLT):** Refers to senior team members including the Chief Executive Officer; Executive Directors, Chief Human Resource Officer, Chief Financial Officer and Heads of Departments.

Organizational Management Group (OMG)

Program Management Group (PMG)

**Safeguarding Committee (SC):** Refers to a committee nominated by the Chief Executive Office, including a chairperson also appointed by the CEO. The chairperson and the members will have due powers to facilitate the implementation of this policy, advise different departments, receive cases of safeguarding violation and ensure survivor support. The Safeguarding Committee shall report to the SLT. The committee includes the following:

- 1 External Expert
- Chairperson (as appointed by CEO)
- Members from various departments in Head Office (HO)
- Members from various departments in each state
- Members from state to be invited as and when there is a case from the respective state (in which the complaint has arisen)

**Quorum:** There should be a quorum of 50% with at least 1 SLT, 1 OMG, 1 PMG and state representative in case of a case arising from a particular state. The External Expert may be included in the quorum, should the complaint remain unresolved at the internal level.

(Ensure gender balance in the committee, including staff representing actual diversity in the organization)

## GUIDING PRINCIPLES

This Policy is guided by the Indian legal framework upholding the rights of children and commitments to safeguarding. These include the following:

|                                                                       |                                                                                                                                                                                                                                                              |
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| <b>Best Interest of the Child</b>                                     | The staff and organizational decisions on safeguarding shall keep the best interest of children and child survivors at the center.                                                                                                                           |
| <b>Childs Right to Participation</b>                                  | Children shall be provided with an enabling environment and will be empowered to voice their opinions on decisions that impact them. They shall also be empowered on personal safety principles and the belief that their reporting will be taken seriously. |
| <b>Openness, transparency</b>                                         | The senior management shall develop a culture of openness and transparency with space for open discussion on risks and safeguarding such that children, community and staff feel comfortable to report without fear.                                         |
| <b>Accountability</b>                                                 | The Management shall also ensure accountability to fair and timely redressal of all reported cases and incidents.                                                                                                                                            |
| <b>Confidentiality</b>                                                | MC shall ensure to keep the identity and documents of all children/ community members safe and protected. Also, the identity of survivors and whistle blowers shall be confidential and shared only for need-to-know basis for case redressal.               |
| <b>Constitution, International/National policies and legislations</b> | The policy actions will align to the UN Convention on Child Rights, Indian legislative framework including laws addressing Juvenile Justice Act, POCSO, Child labor etc.                                                                                     |

## COMPONENTS OF THE POLICY

### 1. PREVENTION

**1.1. ENSURING SAFE PEOPLE:** The organization shall put in place adequate measures to ensure that people selected/ recruited in the organization or hired for services are safe for children and community members.

|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <b>Recruitment</b> | <p>The recruitment and onboarding process leads to the selection of safe people in the organization.</p> <ul style="list-style-type: none"> <li>Place the Safeguarding policy on the website and mention it in job advertisements to let candidates know MC's commitment.</li> <li><b>Vetting:</b> The screening and interviews should assess the person on safeguarding and behavior towards children. <b>Reference Check</b> shall ensure past history and behaviors in this context of children. For field staff, reference letter from a person known to the organization/credible community sources is required. In absence of it, conduct home visit.</li> <li><b>Clear Expectation:</b> Members in the scope of the policy shall be provided a copy of the policy. Their employment letter shall have a clause on adhering to safeguarding norms.</li> </ul> |
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- **Everyone shall** sign a pledge and shall be trained in safeguarding during induction. **Annexure 10**
- **Monitor & Oversight:** Supervision and appraisal systems shall include safeguarding observations.
- **Interns, volunteers and consultants:** ensure address and identity proof is recorded. Ensure they interface children in presence of MC employees or there is appropriate oversight. Their engagement includes compliance with safeguarding and signing of pledge.

#### Code of Conduct

Behaviour of staff and other stakeholders is an important determinant for the well-being of children. Behaviors are often affected by local culture and informalization of relationships. A written code of conduct with respect to children is provided under the policy as **Annexure 1**

#### Training, Awareness and Dissemination

All members of MC and those under the scope of this policy should be aware of the norms of the policy, practice conscious risk awareness and mitigation and procedures for reporting risk and safeguarding violation. MC shall ensure training to:

- **Board and Senior Management:** Review and Orientation every year.
- **Employees at Head office and state offices:** Induction Training and an annual Training
- **Field Staff, especially those directly in contact with Children:** Training provided through Induction and Pre-service and incremental training every 6 months. *For caregivers, Safeguarding shall be covered in one of four training courses organized every year.* In case caregiver is a new joiner, s/he is required to undergo SFG training within 1 month of joining.
- **Vendors, Consultants:** To share a short version of the policy and provide a verbal brief.
- **Communities, Parents and Children:** Periodic awareness session, dissemination of information through program material, display at center and through IEC material.

## 1.2. STEPS TO MAKING OPERATIONS SAFER

### 1. Risk Assessment and Mitigation

Risk Assessment is an important tool to minimize risk and ascertain safety. There should be periodic risk assessment, mitigation and recording at:

- **Organizational level:** Once in six months in a specified Risk Register
- **Department level:** Once in six months along with planning and review
- **Program level:** During program design, initiation of implementation, before any event and then periodically once in six months
- **Centers/Creches:** Once in a quarter

Process and format for conducting risk assessment and mitigation is in **Annexure 2**

**Safeguarding Informed Programme** It means integrating safeguarding across program cycle including program design, implementation, events, program reporting, monitoring & evaluation. Refer **Annexure 3**

**Infrastructure Safety** Ensure all infrastructure used for MC offices and programs shall follow basic norms as per **Annexure 7**. Conduct risk mitigation periodically for all physical spaces.

**Research, MIS and data protection** In the process of collating data in MC, ensure children and community members are respected and their informed consent is taken. All data shall be shared and stored safely. Ensuring the protection of identifying information and the privacy of the child/ community is a safeguarding responsibility.

**Communication** Photographs, case studies and MIS-related information

- Should be collected only when needed and as much needed and by designated individuals only.
- Informed verbal and written consent should be taken. Consent is time bound. Form for taking informed consent for photographs is given in **Annexure 6**
- Photo/ data/case story should be shared externally only for a reasonable time e.g. 3 years from collection or closure of the programme unless authorized.
- Should be transferred through safe means (e.g., avoid WhatsApp)
- Should not be stored on personal devices and used on personal social media.
- Anonymize data/remove identifying details before external sharing by an authorized person. Share/publish minimum photographs (**use password protection when sharing documents/photographs etc. outside MC**). **Details in Annexure 5**

## 2. IMPLEMENTATION OF THE POLICY: RESPONSIBILITY AND MANAGEMENT STRUCTURE

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| <b>Senior Leadership Team</b> | <ul style="list-style-type: none"> <li>- Develop a culture of Openness and Transparency</li> <li>- Oversight of implementation of the policy</li> <li>- Ensure survivor support and case redressal fairly and timely.</li> <li>- Ensure all staff is equipped and the Safeguarding Committee has the requisite knowledge, powers and resources.</li> <li>- Develop internal resources and knowledge on Safeguarding including for case redressal</li> <li>- Ensure Organizational Risk Assessment is conducted, recorded and shared with the Board</li> <li>- Ensure six monthly meeting on Safeguarding with Safeguarding Committee</li> <li>- Ensure all agreement and MoUs with external stakeholders address Safeguarding</li> </ul> |
| <b>Safeguarding Committee</b> | <ul style="list-style-type: none"> <li>- Develop content for training and ensure training of all staff.</li> <li>- Ensure implementation of various components of the policy.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <b>and Extended Safeguarding group</b> | <ul style="list-style-type: none"> <li>- Develop IEC, video etc. to support awareness of the policy.</li> <li>- Initiate case redressal with urgency.</li> <li>- Keep the Management team informed of the progress of implementation flag risks.</li> <li>- Support establishing risk assessment processes in every department/ center.</li> <li>- Raise significant risk if any and share all cases and advice on mitigation and case redressal.</li> <li>- Conduct Safeguarding audits periodically to ascertain progress and status.</li> <li>- Support integrating safeguarding in all new proposals including safeguarding costs.</li> </ul> |
| <b>All Staff</b>                       | <ul style="list-style-type: none"> <li>- High-Risk Awareness and action to mitigate risks.</li> <li>- Follow the policy and code of conduct.</li> <li>- Ensure proactive and timely Reporting and support redressal when needed.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Review of Policy</b>                | Once in 3 years or as and when there's legal and policy change that requires a change in the safeguarding policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

### 3. DETECTION AND REPORTING

Detection and Reporting refer to proactive steps to locate risk of harm, possibility of harm and violation that have occurred as early as possible.

#### 3.1. DETECTION OF SAFEGUARDING VIOLATIONS shall be practiced through:

- **Introducing Peer Appraisal/community feedback for employees who work closely with children/adult at risk.**
- **Make Safeguarding integral to Monitoring Visits and reports of Program managers/supervisors**

**3.2. REPORTING:** MC shall ensure a simple reporting process, accessible to all employees and community members and children. MC shall promote reporting through sustained awareness of employees, community and children on the reporting system and develop confidence for a time-bound transparent redressal system.

#### Safeguarding Reporting for Employees

##### 3.2.1. What to Report      **Safeguarding Violations**

Any act of disrespect, discrimination, neglect, intimidation, undue favor or taking bribe.

Any act or suspicion or likelihood of, exploitation, emotional, physical or sexual abuse, harm, bullying, or humiliation to a child or adult community member.

An act that puts a child/adult at risk of harm or abuse or increases risk of harm or abuse.

A failure to act in a situation where a person is at risk of being/being abused/harmed.

Failure to follow this policy and the code of conduct of the organization

##### 3.2.2. Who to Report      **MC Staff:** To the Safeguarding Focal Person (SFC) of the department/ location as per **Annexure 8 or** to a member of the Safeguarding Committee

**Vendors/Consultants/Visitors:** To the reporting person as referred to in the agreement or Safeguarding Committee member

Report to the CEO

**If the Complaint is  
against the chairperson**

Report to chairperson

**Complaint against a  
member of  
Safeguarding  
committee**

### **3.2.3. When to Report**

All MC staff must mandatorily report (including suspicion) instance of a safeguarding violation as soon as possible subject to a maximum of 24 hours.

Early reporting would mean quicker relief to the survivor. However, if you are not able to report within the stipulated time, report as soon as you can.

### **3.2.4. How to Report**

Call immediately the reporting person.

Additionally, office Staff and those in supervisory positions send a filled incident form (**Annexure 11**) to the reporting person or Safeguarding Committee by email at the earliest.

## **Community Reporting for Community Members and Children**

1. The community members and children can report safeguarding violations (as defined above) to
  - The Community Safeguarding Person notified them
  - Any member of MC and the safeguarding committee.
 The list of Community Safeguarding Persons (CSP) is attached as **Annexure 9**
2. Every department shall appoint Community Safeguarding Persons based on location, access and approachability to the community and children. These persons should be easily accessible and approachable to the community but should not be the direct implementation personnel in touch with them on a day-to-day basis.
3. MC shall develop content/ videos/ training manuals to ensure awareness among community members on MC's zero tolerance to safeguarding violations and the reporting procedure.

## **4. STEPS TO BE UNDERTAKEN ONCE THE REPORT IS RECEIVED**

### Safeguarding Focal Person or Community Safeguarding focal person or anyone who receives complaint must

Listen carefully. Ask additional questions only if the complainant is calm and willing to provide more information especially if survivor needs urgent support.

Share next steps with complainant and request them to maintain confidentiality. Ensure fair redressal and tell them they can meet whenever they want or provide additional information.

Do not initiate any inquiry on your own as it may create risk. If there is an urgent need to intervene consult a safeguarding committee member.

Inform Member of Safeguarding Committee (SC) Telephonically and through email as soon as possible. Inform the risk to complainant

Send Incident Form filled by complainant or on their own ( in case of community or field worker) to SC

### Member of the safeguarding committee shall

Inform other members of Safeguarding Committee Telephonically

Inform Chairperson who should inform the trustee in charge

Call for an urgent meeting of the SC within 24 hours to decide the next course of action

Nominate one person for case recording. Ensure all information is safe and maintain confidentiality of case, survivor, complainant and alleged accused.

Proceed for preliminary assessment/ verification or collation of additional data.

## 5. REDRESSAL

The various steps in the process of redressal are grouped in the table below.

**5.1. Preliminary Assessment with Confidentiality:** Assess whether the case received is in the scope of Safeguarding. If not refer to the appropriate administrative body e.g., grievance committee.

Collate necessary additional information for greater clarity to verify the case.

If the complainant is available and willing to share the details, the members of the safeguarding committee can have a direct meeting.

**5.2. Survivor Safety:** Take necessary steps to ensure the safety of the survivor. Extend immediate support to the survivor and develop a plan of action for the interim. Assign responsibility for survivor support.

**5.3. Informing Authorities:** In coordination with the senior management, decide on reporting/ providing information about the violation to the requisite statutory and government authorities.

- Mandatory Reporting in cases of POCSO with due respect to the survivors' rights and decision
- If safeguarding violation is an offence as per POCSO, Juvenile Justice Act or IPC, extend support or file the First Information Report (FIR).

**5.4. Initiate Inquiry:** The senior management shall appoint an inquiry committee. It should include at least two members of the safeguarding committee. SLT can also decide to hire external expert in the committee or choose an expert organization for investigation. Conduct Inquiry as per the disciplinary procedure of the organization.

Process of inquiry detailed in **Annexure 13**

## 6. ACTION BY SENIOR MANAGEMENT:

**Action:** The Chairperson on recommendation of the inquiry committee shall take corrective or punitive action as per the disciplinary procedure including *counselling, warning, written apology, demotion, stoppage of increment or freeze on promotion, suspension without salary, dismissal etc.* as per the disciplinary procedure of the organization.

**Duly inform complainant:** In case the complaint was received from the community or the child, keep the community member or the child informed of the process and outcome.

**Documentation and Learning:** It is also important to learn from the violation/ lapse and the Safeguarding Committee and the SLT should take systemic preventive action.

## 7. SAFEGUARDING COMMITTEE MEMBERS (PERIOD 2026-29):

| S. No. | Committee Members   | MC Departments                  | Designation                                               | Designation on Committee |
|--------|---------------------|---------------------------------|-----------------------------------------------------------|--------------------------|
| 1      | Sanjay Kumar Tiwari | CCS-Direct (HO)                 | Sr. Thematic Lead                                         | Chairperson              |
| 2      | Komal Ganotra       | ---                             | ---                                                       | External Expert          |
| 3      | Monika Banerjee     | MEAL                            | Head                                                      | Member                   |
| 5      | Namrata Edwards     | Parenting                       | Thematic Lead                                             | Member                   |
| 6      | Bhupendra Shandilya | Networks & Partnership          | Manager                                                   | Member                   |
| 7      | Ajanta Kafley       | CCS-Direct (HO)                 | Manager                                                   | Member                   |
| 8      | Meena Sharma        | CCS-Direct (Delhi)              | Program Officer<br>(State representative)                 | Member                   |
| 9      | Satrupa Kadiyam     | CCS-Direct<br>(Chhattisgarh)    | Creche Supervisor<br>(State representative)               | Member                   |
| 10     | Shashidhara M       | CCS-Partnerships<br>(Karnataka) | Trainer (State<br>representative)                         | Member                   |
| 11     | Ashish Kumar Mahto  | CCS-Direct (Jharkhand)          | Cluster Coordinator<br>(State representative)             | Member                   |
| 12     | Rajesh Ashok Pere   | CCS-Direct<br>(Maharashtra)     | Community<br>Engagement Officer<br>(State representative) | Member                   |
| 13     | Dali Nayak          | CCS-Direct (Odisha)             | Creche Supervisor<br>(State representative)               | Member                   |
| 14     | Avik Mitra          | CCS-Direct (West Bengal)        | State lead (State<br>representative)                      | Member                   |