CHRYSALIS SERVICES · POLICY

Child Protection Policy

Keeping children safe in our fieldwork, research, communications and partnerships

Legal entity	Chrysalisis Services Private Limited ("Chrysalis Services" or "the Company") CIN U74140TN2020PTC134552 · Registered office: Chennai, Tamil Nadu
Version	Version 1.0
Policy owner	Human Resources, with the Child Protection Officer
Review cycle	Annually, or earlier if the law or our operations change. Next review due by November 2027.
Applies to	All employees, interns, directors, consultants, associates, field investigators and enumerators, and partners and vendors whose work involves children.

1. Policy statement

Children are among the people most affected by the programmes that Chrysalis Services designs, manages and assesses, in education, health, nutrition, sports, child protection and many other areas. Our teams meet children in schools, anganwadis, homes and communities, collect information about them, and tell their stories in our reports. Every child has the right to be protected from abuse, exploitation, neglect and harm, and the right to be treated with dignity.

The Company has zero tolerance for child abuse and exploitation. We are committed to making sure that our people, our work and our partners do not harm children in any way, that concerns are reported and acted upon promptly, and that the best interests of the child are the primary consideration in every decision that affects a child.

2. Legal framework and principles

This Policy is framed in accordance with Indian law, including the Protection of Children from Sexual Offences Act, 2012 ("POCSO Act"), the Juvenile Justice (Care and Protection of Children) Act, 2015, the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986, the Prohibition of Child Marriage Act, 2006, the Information Technology Act, 2000, the Bharatiya Nyaya Sanhita, 2023 and the Digital Personal Data Protection Act, 2023, and is guided by the United Nations Convention on the Rights of the Child. Where this Policy sets a higher standard than the law, the Policy applies.

The Policy rests on five principles:

Principle	What it means for us
Best interests of the child	The safety and wellbeing of the child take precedence over any research, programme or commercial objective.
Do no harm	We assess and minimise risks to children before any activity that involves them, directly or indirectly.
Participation	Children are entitled to be heard on matters that affect them, in a manner appropriate to their age and maturity, and to decline to participate.

Principle	What it means for us
Non-discrimination	Every child receives equal protection, regardless of gender, caste, religion, disability or any other status.
Confidentiality with duty to act	Information about children is kept confidential, but concerns about a child's safety are always reported and never kept secret.

3. Definitions

Term	Meaning
Child	Any person below the age of eighteen years.
Child abuse	Any act or omission that harms or is likely to harm a child, including physical abuse, emotional abuse, sexual abuse, neglect and exploitation.
Sexual abuse	Any sexual activity with a child or involving a child, including touching, exposure, sexual comments, grooming, showing sexual material to a child, and producing, possessing or sharing child sexual abuse material, whether in person or online.
Exploitation	Using a child for the benefit of another, including child labour, trafficking, and the use of a child's image or story in a degrading way or without consent.
Safeguarding	The measures the Company takes to prevent harm to children and to respond appropriately when concerns arise.
Child Protection Officer (CPO)	The person designated by the Company under Section 9 to receive concerns and coordinate the Company's response.

4. Scope

This Policy applies to all employees, interns, directors, consultants, associates, freelancers, field investigators and enumerators of the Company, and to any person acting on its behalf, at all times while they are engaged in Company work, including during travel and fieldwork. It also applies to NGO partners, field agencies and vendors to the extent set out in Section 8. It covers direct contact with children, as well as indirect contact, such as handling children's data, photographs, case stories or records.

5. Safe recruitment and induction

- Every person who will have direct contact with children in the course of Company work, including field investigators engaged through agencies, will be subject to reference checks before deployment. Where permissible and practicable, the Company will also seek police verification or a self-declaration of any criminal proceedings.
- Every such person must sign an acknowledgement of this Policy (**Annexure B**) and receive a safeguarding briefing before deployment.
- No person who has been convicted of, or is facing proceedings for, an offence against a child will be engaged in any role involving contact with children.

6. Code of behaviour

Every person covered by this Policy must observe the following standards whenever they are in contact with children, directly or indirectly.

6.1 Always

- Treat every child with respect and dignity, and speak in a language and manner appropriate to the child's age and understanding.
- Make sure that another adult, such as a parent, guardian, teacher or colleague, is present or within sight when you are with a child. Work with children in open, visible spaces.
- Seek the consent of a parent or guardian, and the assent of the child, before interviewing, photographing or recording a child.
- Respect a child's wish to stop, to skip a question or to leave at any time.
- Report any concern about a child's safety to the Child Protection Officer, as set out in Section 9.

6.2 Never

- Never hit, physically punish, threaten, shame or humiliate a child.
- Never touch a child in an inappropriate or culturally insensitive way, or engage in any sexual activity or relationship with a person below eighteen years of age, regardless of any local custom or belief about the age of consent.
- Never spend time alone with a child in a closed or isolated place, take a child to your accommodation, or transport a child alone.
- Never share your personal phone number, social media accounts or contact details with a child, or contact a child privately, including online.
- Never give money or personal gifts to individual children, or ask a child to perform any service for you.
- Never employ a child, or encourage anyone else to employ a child, for domestic or any other work.
- Never show a child, or allow a child to access, inappropriate material, and never create, possess or share sexual images of children.
- Never consume alcohol or intoxicating substances while working with children.
- Never keep a concern about a child secret, or promise a child that you will keep a disclosure confidential.

7. Research, data and communications involving children

7.1 Research and data collection

- Every study that involves children as participants, or that collects information about identifiable children, must be approved through the Company's internal ethics review process before fieldwork begins.
- Data will be collected from children only where it cannot reasonably be obtained from an adult, and questions will be limited to what the study genuinely requires.
- The consent of a parent or guardian and the assent of the child must be obtained and recorded. Where data is processed digitally, verifiable parental consent will be obtained as required under the Digital Personal Data Protection Act, 2023 and the rules made under it, as they come into force.

- Interviews with children will take place in a safe and visible setting, preferably with a trusted adult nearby, and will be conducted by investigators who have been briefed on child-friendly methods.
- Sensitive topics, such as abuse, violence, sexual health or family conflict, will be explored with children only where the study design specifically requires it and the ethics review has approved appropriate safeguards, including a referral pathway.
- If a child becomes distressed, the interview must stop. If a child discloses harm, the investigator must follow Section 9 and must not attempt to probe further.
- Children's data will be anonymised at the earliest practicable stage, stored securely on Company-approved systems, and never used for any purpose other than the one for which consent was obtained.

7.2 Photographs, videos and stories

- Images and stories of children will be used only with the informed consent of a parent or guardian and the assent of the child, and only for the purpose explained to them.
- Children will be portrayed with dignity, and never in a manner that is degrading, sexualised or that exaggerates their vulnerability.
- Names of children will be changed in all reports and communications, and no image or story will be published together with details that could identify or locate the child, such as a full name, school, village or address.
- The identity of any child who is a survivor of abuse, or who is in contact with the justice system, will never be disclosed, in accordance with the POCSO Act and the Juvenile Justice Act.
- Images of children for external publication must be approved by the engagement lead, and any image that raises a doubt must be referred to the Child Protection Officer.

8. Partners and suppliers

Where the Company engages field agencies, associates or vendors whose personnel will have contact with children, or recommends NGO partners whose programmes involve children, the Company will:

- require them, through contract or engagement terms, to comply with this Policy or with a child protection policy of an equivalent standard;
- include an assessment of child safeguarding arrangements in the due diligence it carries out on NGOs and implementing agencies, where relevant to the engagement; and
- act on any credible concern, including by reporting it, suspending the engagement or advising the client accordingly.

9. Reporting and responding to concerns

9.1 Child Protection Officer

Child Protection Officer	Ms. Apoorva Pandey, Lead, Consulting Services
Alternate contact	Ms. Sarutha Narayanan, Senior Executive – HR sarutha@chrysalis-services.in
Emergency services	CHILDLINE: 1098 · Emergency response: 112

9.2 What to do if a child is in immediate danger

If a child is in immediate danger, the first priority is the child's safety. Contact the police on 112 or CHILDLINE on 1098, take reasonable steps to keep the child safe without putting yourself at risk, and then inform the Child Protection Officer as soon as possible.

9.3 What to do if a child tells you something

- Listen calmly, take the child seriously, and reassure the child that they were right to tell you.
- Do not ask leading questions, do not investigate, and do not confront the alleged abuser.
- Do not promise to keep it a secret; explain that you will need to tell someone who can help.
- Write down, as soon as possible, what the child said in their own words, the date, time and place, and what you observed.

9.4 Duty to report

Any person covered by this Policy who suspects, witnesses or is told about abuse or a risk of harm to a child, including by a Company employee, associate or partner, must report it to the Child Protection Officer **within twenty-four hours**, using the format in **Annexure A**. If the concern involves the Child Protection Officer, it must be reported to the alternate contact or to the Managing Director.

> Under Section 19 of the POCSO Act, any person who has knowledge, or apprehends, that a sexual offence against a child has been or is likely to be committed is required to report it to the Special Juvenile Police Unit or the local police. Failure to report is itself an offence under Section 21 of that Act. Reporting internally does not discharge this personal legal obligation, and the Company will support anyone who makes such a report.

9.5 How the Company will respond

1. The Child Protection Officer will acknowledge the report immediately and assess the immediate safety of the child.
2. Where the concern relates to a sexual offence or another offence against a child, the Company will report it to the police or the Special Juvenile Police Unit without delay, and will cooperate fully with the authorities. Where appropriate, the Company will also inform the Child Welfare Committee or the District Child Protection Unit.
3. Where the concern involves a Company employee, associate or field investigator, that person will be removed from any contact with children, and may be suspended pending inquiry. The matter will be handled under the Company's Disciplinary Policy, without prejudice to any action by the authorities. Where the concern also involves sexual harassment at the workplace, the Internal Committee under the POSH Policy will be informed.
4. Where the concern involves a partner or vendor, the Company will report it as required by law, inform the partner's leadership and, where appropriate, the client, and may suspend or end the relationship.
5. Every report will be handled confidentially. Information will be shared only with those who need it to protect the child or to comply with the law.
6. The Child Protection Officer will maintain a confidential record of every concern and the action taken.

No person who reports a concern in good faith will face any adverse consequence, even if the concern is not substantiated. A report that is shown to have been made knowingly false or with malicious intent may lead to disciplinary action.

10. Breach of this Policy

Any breach of this Policy by an employee will be treated as serious misconduct and may lead to termination of employment. A breach by a consultant, associate, field investigator or vendor may lead to immediate termination of the engagement. Where the conduct may constitute an offence, the Company will report it to the authorities.

11. Training, monitoring and review

All employees will be briefed on this Policy at induction and at least once a year thereafter. Field investigators and associates will receive a safeguarding briefing before every deployment that involves contact with children. The Child Protection Officer will report to the Managing Director at least once a year on concerns received, actions taken and lessons learned. Human Resources, with the Child Protection Officer, will review this Policy annually.

Annexure A: Child safeguarding concern report

To be completed by the person raising the concern and sent to the Child Protection Officer within twenty-four hours. Record facts and the child's own words; do not record opinions or conduct any investigation.

Name and role of the person reporting	
Contact details	
Date, time and place of the concern	
Engagement or project	
Child's first name or identifier, approximate age and gender	
What happened, or what was observed or disclosed (use the child's own words where possible)	
Name and role of the person the concern relates to, if known	
Immediate action taken to keep the child safe	
Whether the police, CHILDLINE or any other authority has been informed	
Signature and date	

Annexure B: Acknowledgement

I confirm that I have read and understood the Chrysalis Services Child Protection Policy. I agree to comply with the code of behaviour and the reporting requirements in it. I declare that I have not been convicted of, and am not facing proceedings for, any offence against a child. I understand that a breach of this Policy may lead to the termination of my employment or engagement and to a report to the authorities.

Name	
Role / organisation	
Signature	
Date	