



SAFEGUARDING POLICY

Main Contacts:

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National Emergency and Helpline Numbers:

SERVICE	NUMBER / CONTACT
Police	100
Childline India (24/7 child helpline)	1098
Women Helpline (National)	181
National Emergency Number	112
iCall iCare (Mental Health Helpline, TISS)	9152987821
Special Juvenile Police Unit (SJPU)	Contact local police station
Child Welfare Committee (CWC)	Contact District Child Protection Unit (DCPU)
National Commission for Protection of Child Rights (NCPCR)	011-23478200

Key Definitions

TERM	DEFINITION
Child	Any person under the age of 18 years, defined by the UN Convention on the Rights of the Child (UNCRC) 1989, the POCSO Act 2012, & the Juvenile Justice (Care and Protection of Children) Act 2015.
Adult	Any person aged 18 years or older.
Vulnerable Adult or Adult at Risk	An adult who may be at risk of abuse or exploitation due to their marginalised background, disability, mental health condition, addiction, age-related frailty, dependence on others, or any circumstance that impairs their ability to protect themselves.
Athlete	Any person, of any age, who participates in sport or physical activity through a SafeSport India programme or partner organisation.
Safeguarding	The set of policies, procedures, and actions taken to promote the welfare of all individuals in an organization and to protect them from abuse, harm, neglect, and exploitation.
Child Protection	The specific actions taken to protect individual children who have been identified as suffering, or likely to suffer, significant harm.
Abuse	Any act or failure to act that results in, or is likely to result in, harm to a child or vulnerable adult. Defined in detail in Section 13
Safeguarding Coordinator	The designated person at SafeSport India responsible for receiving and managing safeguarding concerns and reports.
SafeSport India Representative	Any person covered by this policy, including staff, coaches, volunteers, contractors, and partner organisation employees.
Disclosure	When a child, young person, or adult shares information - directly or indirectly - indicating that they or someone they know has been, or is at risk of being, harmed or abused.
Two-Adult Rule	The requirement that at least two adults are present whenever working directly with children, young people, or vulnerable adults.
Grooming	A process by which someone builds trust with a child, young person, or vulnerable adult - and often their family - in order to manipulate,



Legal Framework

This policy is grounded in and compliant with both Indian law and international standards. All SafeSport India representatives are legally obligated to comply with the following:

3.1 Indian Law

The Protection of Children from Sexual Offences (POCSO) Act, 2012 (as amended 2019)

This is the primary Indian legislation protecting children from sexual assault, sexual harassment, and pornography. Key obligations for organisations include:

- Any person with knowledge or reasonable suspicion of a sexual offence against a child MUST report it to the local police or the Special Juvenile Police Unit (SJPU). Failure to report is a criminal offence punishable by up to 6 months imprisonment and/or a fine.
- The person in charge of any institution (school, academy, college, organisation) must report any offence committed by a person under their control or supervision.
- Institutions regularly working with children must conduct periodic police verification and background checks of all employees who may interact with children. Institutions must have a child protection policy aligned with the state government's policy and a zero-tolerance approach to violence against children.
- The identity of child victims must never be disclosed publicly.

Juvenile Justice (Care and Protection of Children) Act, 2015

- Provides the overarching framework for care, protection, and rehabilitation of children in need. Establishes Child Welfare Committees (CWCs) and requires organisations to act in the best interests of the child at all times.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (POSH Act)

- Organisations with 10 or more employees must have an Internal Complaints Committee (ICC). SafeSport India is committed to providing a safe workplace free from sexual harassment for all employees, interns, and volunteers.

Child Labour (Prohibition and Regulation) Amendment Act, 2016

- Prohibits employment of children under 14 in any occupation. SafeSport India

strictly prohibits the use of children in any form of labour or exploitation.

The Information Technology Act, 2000 (as amended)

- Governs online safety including cyberbullying, online sexual exploitation, and distribution of child sexual abuse material (CSAM). Section 67B specifically criminalises publication or transmission of material depicting children in a sexually explicit manner.

Constitutional Provisions

- Articles 14, 15(3), 21, 21-A, 23, 24, and 39(e)(f) of the Constitution of India collectively guarantee children's rights to equality, education, protection from exploitation and harm, and a life of dignity.

3.2 International Standards

- UN Convention on the Rights of the Child (UNCRC) 1989 - ratified by India in 1992
- UN Convention on the Rights of Persons with Disabilities (UNCRPD)
- International Safeguards for Children in Sport 2016
- ILO Convention No. 182 on the Worst Forms of Child Labour - ratified by India in 2017
- UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

1. Introduction & Our Commitment

1.1 About SafeSport India

SafeSport India is dedicated to creating safe, inclusive, and empowering environments in schools, academies, colleges, sports organisations, and all sport-for-development programmes across India. We work with a wide range of people including students, child and adult athletes, coaches, teachers, administrators, volunteers, and organisational partners.

The welfare and dignity of every person who engages with SafeSport India - regardless of their age, gender, ability, background or identity is our highest priority. We recognise that sport and physical activity can be a powerful force for good, but that they also create settings in which abuse, exploitation, and harm can occur if appropriate safeguards are not in place.

1.2 Our Safeguarding Commitment



Our Commitment

SafeSport India is unconditionally committed to safeguarding all children, young people, athletes, and vulnerable adults who come into contact with our work. We adopt a zero-tolerance approach to all forms of abuse, neglect, exploitation, and harm.

This policy also exist to:

- Prevent harm to all participants in SafeSport India programmes and activities.
- Establish clear standards of behaviour and conduct for everyone associated with SafeSport India.
- Create clear, accessible, and safe pathways for reporting within our organisation
- Ensure all concerns are taken seriously, investigated promptly, and responded to appropriately.
- Meet obligations under Indian and international law where appropriate
- Protect SafeSport India's staff and volunteers from false accusations by setting clear boundaries.
- Build a culture of openness, trust, and accountability.

SafeSport India recognizes that the welfare and interests of all participants in its

programmes and activities are paramount in all circumstances. As part of this recognition, SafeSport India has taken the pledge in favour of the International Safeguards for Children in Sport

- We are committed to working towards safer sport for children, young people and vulnerable adults.
- To support this, we will promote and advocate for safeguards through our networks, and commit to embedding them in our work.

2. Scope of This Policy

CATEGORY	EXAMPLES
Staff & Employees	Full-time, part-time, temporary, seconded, and remote staff
Coaches & Trainers	Sports coaches, physical education teachers, fitness instructors
Teachers & Educators	Academic teachers, tutors, workshop facilitators
Administrators	Programme managers, operations staff, HR, finance, communications
Volunteers & Interns	Student placements, community volunteers, event helpers
Contractors & Consultants	Freelancers, service providers, external experts
Advisory Board	Advisors, consultants
Partner Organisations or Clients	Schools, academies, colleges, sports clubs, NGOs, corporates
International Partners	Foreign organisations, overseas visitors, exchange programme participants
Media & Journalists	Photographers, videographers, journalists visiting programmes
Participant's Families	Parents, guardians, and caregivers attending SafeSport India activities



Note

All persons covered by this policy must sign the Commitment & Acknowledgement Form (Annex A) before beginning any work or activity with SafeSport India. No exceptions.

3. Safeguarding Principles

Everything we do at SafeSport India is guided by these core principles:

1. Welfare is Paramount

The safety, wellbeing, and best interests of the child or vulnerable adult are the highest priority in every situation and decision. No other consideration - including reputation, programme continuity, or sponsor relationships - takes precedence.

2. Everyone Has the Right to be Safe

All participants - regardless of age, gender, caste, religion, disability, race, ethnicity, socioeconomic background, sexual orientation, or any other characteristic - have an equal right to participate safely and with dignity.

3. Everyone Shares Responsibility

Safeguarding is not just the job of the Safeguarding Coordinator. Every person covered by this policy is individually responsible for upholding its standards.

4. Vulnerability Must be Recognised

Some children, young people, and adults face greater risks than others - including those with disabilities, those from marginalised communities, those in institutional care, and those in positions of dependence. Additional care and protection must be given to those who may be more vulnerable.

5. Openness & Accountability

We foster a culture where concerns can be raised safely, where questions are welcomed, and where safeguarding is treated as a shared organisational value.

6. Listen to Children & Young People

Children and young people are active rights-holders, not passive objects of protection. Their voices, concerns, and experiences must be heard and respected.

7. Act on Concerns

When a concern is raised, it must be acted upon promptly. Inaction is never appropriate. All concerns must be recorded and reported.

8. Protect Survivors

Survivors of abuse must be treated with dignity, sensitivity, and without blame. Their safety and wellbeing take absolute priority throughout any investigation.

4. Code of Conduct: What You MUST Do

4.1 General Behavior

- Always treat children, young people, athletes, and adults with respect, dignity, and fairness regardless of their background, identity, or ability.
- Maintain professional boundaries at all times. Keep relationships with participants professional and appropriate.
- Apply the Two-Adult Rule: wherever possible, ensure at least two adults are present when working with children or vulnerable adults. Where a one-to-one situation is unavoidable (e.g. individual coaching), inform your line manager and ensure the setting is visible and transparent.
- Use positive, non-violent, non-humiliating methods to manage behaviour. Never use physical punishment or intimidation.
- Ensure any physical contact (e.g. during sports coaching or medical/first aid) is appropriate, necessary, and culturally sensitive. Never touch a child or adult in a way that could be misinterpreted.
- Report any concern, suspicion, or incident to the Safeguarding coordinator immediately. Do not wait, investigate yourself, or seek to resolve it informally.
- Comply fully with any safeguarding investigation, including providing information and documentation as requested.
- Ensure participants and their parents/guardians know who the Safeguarding coordinator is and how to raise concerns.
- Read, sign, and abide by this policy on appointment and at every annual review.

4.2 Transport & Travel

- Never transport a child or vulnerable adult alone in a vehicle unless there is an absolute necessity, and only with written parental/guardian consent and manager approval.
- Where possible, transport children in groups with more than one adult present.

- Ensure all transport arrangements are communicated to parents or guardians in advance.

4.3 Communication

- All communications with participants under 18 must be through official SafeSport India channels (e.g. official email, approved platform). Never use personal social media, WhatsApp, or personal phone numbers to contact minors.
- Copy parents or guardians into all communications with participants under 16 years old.
- Keep records of all significant communications with participants.

5. Code of Conduct: What Is Strictly Prohibited



Strictly Prohibited

The following behaviours are absolutely prohibited. Any breach will result in immediate disciplinary action, which may include dismissal, contract termination, and/or referral to law enforcement.

5.1 Sexual Conduct

- Any form of sexual activity, relationship, or contact with a child (person under 18) is strictly prohibited, regardless of claimed consent, local custom, or the legal age of consent in any jurisdiction. Mistaken belief about age is not a defence.
- Any form of sexual activity with an adult participant where there is an inherent power imbalance (e.g. coach/athlete, teacher/student) is prohibited.
- Making sexually suggestive comments, gestures, or jokes to or in the presence of participants.
- Accessing, viewing, creating, downloading, or distributing sexual images of children in any format, including online. This is a criminal offence under Indian law (POCSO Act and IT Act).
- Any form of sexual harassment, as defined under the POSH Act 2013.

5.2 Physical & Emotional Harm

- Physical punishment, striking, hitting, or any form of physical force used against a child or adult participant.
- Acting in ways that shame, humiliate, degrade, belittle, bully, or demean any participant in person or online.
- Threatening, scaring, isolating, or discriminating against any participant.

5.3 Boundary Violations

- Spending time alone with a child or vulnerable adult in an unobserved, private location.
- Taking a child or young person to your home, especially where they would be alone with you.
- Inviting an unaccompanied minor into a private residence (except in cases of immediate danger where no alternative exists).
- Giving or receiving personal contact details (phone number, personal email, social media handles) from any participant under 18.
- Engaging in personal communications with minors outside official SafeSport India channels.
- Giving preferential treatment, gifts, money, or special favours to individual participants.
- Promising incentives or rewards to gain a child's trust or compliance.

5.4 Exploitation & Misuse

- Using children or vulnerable adults for personal or organisational benefit in ways that exploit their position, need, or vulnerability - including for domestic labour, commercial purposes, or personal gain.
- Encouraging or facilitating child marriage (marriage under the age of 18 is prohibited under Indian law regardless of parental consent).
- Providing or allowing minors to access alcohol, illegal drugs, or harmful substances.
- Recording, photographing, or filming participants without proper consent (see Section 11).
- Grooming: building relationships through deception or manipulation in order to exploit or abuse.

5.5 Misconduct Around Reporting

- Failing to report a known or suspected safeguarding concern. This is also a criminal offense under the POCSO Act.
- Attempting to investigate a safeguarding concern yourself without involving the Safeguarding Coordinator.
- Disclosing the identity of a child victim or whistleblower.
- Retaliating against, victimising, or disadvantaging any person who reports a safeguarding concern in good faith.

6. Roles & Responsibilities

6.1 The Safeguarding Coordinator

SafeSport India will appoint a designated Safeguarding Coordinator (SC). The SC is the primary point of contact for all safeguarding concerns. Where SafeSport India operates across multiple locations, a Safeguarding Focal Person (SFP) will be

appointed at each site, reporting to the SC.

The Safeguarding Coordinator is responsible for:

- Receiving, recording, and managing all safeguarding reports and concerns
- Leading or overseeing all safeguarding investigations in line with this policy
- Liaising with police, Child Welfare Committees, Social Services, and other statutory authorities as required
- Referring cases to the Special Juvenile Police Unit (SJPU) where required under POCSO
- Ensuring all staff, volunteers, and partners are trained in safeguarding
- Keeping safeguarding records securely and confidentially
- Reporting to the Leadership on safeguarding matters every quarter
- Leading the annual review of this policy
- Staying updated on changes to Indian and international safeguarding law and guidance
- Monitoring the safeguarding email address daily (maximum 48-hour response)

6.2 The Internal Complaints Committee (POSH)

SafeSport India maintains an Internal Complaints Committee (ICC) as required by the POSH Act 2013. The ICC handles complaints of sexual harassment in the workplace from any employee, intern, or volunteer. The ICC operates independently from the safeguarding reporting channel, though cases involving minors must also be referred to the Safeguarding Coordinator.

6.3 Coaches, Teachers, & Direct Programme Staff

- Complete mandatory safeguarding induction training before working with participants
- Apply the Two-Adult Rule at all times
- Immediately report any concern, disclosure, or incident to the Safeguarding Coordinator
- Maintain appropriate professional boundaries with all participants at all times
- Know the signs of abuse and harm (see Section 13)
- Never investigate a concern themselves: report and let the Safeguarding Coordinator take over

6.4 All SafeSport India Representatives

- Read, understand, and sign this policy
- Behave in accordance with the Code of Conduct at all times
- Report any concern to the Safeguarding Coordinator - this is a legal and ethical obligation
- Cooperate fully with any safeguarding investigation
- Maintain the confidentiality of safeguarding information

7. Safe Recruitment & Background Checks

SafeSport India is committed to safe recruitment processes. Creating a safe environment begins before a person starts work.

7.1 For All Roles

- All job advertisements state that SafeSport India is committed to safeguarding and that appointments are subject to satisfactory checks.
- Candidates must provide proof of identity against original documents (Aadhaar, passport, or government-issued photo ID).
- Employment history must be verified, including explanation of any gaps.
- A minimum of two professional references are required. Referees will be asked specifically about the candidate's suitability to work with children and young people.
- Candidates are asked safeguarding-specific questions during interview.
- All successful candidates must read and sign this policy before starting work.
- Mandatory police verification for all new employees/interns/staff joining SafeSport India.

7.2 For Roles Involving Direct Contact with Children or Vulnerable Adults

- A Police Clearance Certificate (PCC) / Character Certificate must be obtained. Under the POCSO Act, periodic police verification is mandatory for all staff with regular child contact.
- Where a police check is not available, a written self-declaration of good conduct will be required, supplemented by community references where appropriate.
- A criminal record is not an automatic disqualification. The HR Manager, in consultation with a senior manager and the Safeguarding Coordinator, will assess the nature and relevance of any offence. In cases of doubt, the appointment will not proceed.

7.3 Contractors, Consultants & Volunteers

- All contractors, consultants, and volunteers must undergo the same identity and background checks as employees before commencing any work involving children or vulnerable adults.
- Contracts and volunteer agreements must include a clause requiring compliance with this Safeguarding Policy. This policy is deemed incorporated into all contracts.
- Contractors are responsible for ensuring their own sub-contractors and agents comply with these requirements.

7.4 Ongoing Monitoring

- Background checks should be renewed periodically (minimum every 3 years) for staff in regular direct contact with minors.
- All staff must confirm annually in writing that they have re-read and continue to abide by this policy.

8. Training & Awareness

ROLE	REQUIREMENT	DEADLINE
Safeguarding Coordinator, Programme Lead	Advanced safeguarding training, POCSO awareness, investigation procedures; trauma-informed approaches	Within 1 month of appointment; refreshed annually
Coaches, Trainers, Staff	Intermediate safeguarding training, recognising abuse; disclosure handling; reporting procedures	Before first working with participants; refreshed every 2 years
Admin, Operations Staff	Safeguarding awareness, policy overview, reporting obligations, online safety	Within 3 months of appointment; refreshed every 3 years
Volunteers, Interns, Visitors	Safeguarding induction briefing; Code of Conduct signing, key contacts and reporting line	Before any contact with participants
Advisory Board	Governance-level safeguarding training; policy overview; legal obligations	Within 3 months of appointment; refreshed annually

9. Risk Assessment & Safer Programming

Safeguarding risks must be identified and managed before they cause harm. A risk assessment must be completed for every SafeSport India programme, activity, event, and visit, whether in person or online.

9.1 When to Conduct a Risk Assessment

- Before starting any new programme, activity, or event involving children or vulnerable adults
- Before any programme visit, field trip, or travel with participants
- Before launching any online engagement or digital activity with participants
- When there is a significant change to programme activities, locations, or participants
- Following any safeguarding incident - to prevent recurrence

9.2 What a Risk Assessment Must Consider

- The age, vulnerability, and specific needs of participants (disability, gender, caste, language barriers, previous trauma)
- The physical environment: is the space safe, private, and appropriate?
- Staffing ratios: are there enough adults to maintain supervision and the Two-Adult Rule?
- Transport arrangements: are they safe and supervised?
- Online elements: what platforms are being used, and are they age-appropriate?
- Emergency procedures: what happens if a concern is raised during the activity?
- Local context: are there any contextual risks specific to the community, school, or region?
- Cultural sensitivities: are programme activities respectful of local norms?

Note



Risk assessments must be documented using the template in Annex C and reviewed and approved by the Safeguarding Coordinator before the activity takes place.

10. Working with Partner Organisations

SafeSport India works with schools, sports academies, colleges, NGOs, corporate organisations, and international partners. Safeguarding obligations extend to all partner relationships.

10.1 Partner Requirements

Before entering into any formal agreement with a partner organisation that involves contact with children or vulnerable adults, SafeSport India will:

- Require the partner to have, or to commit to developing within 2 months, a safeguarding policy that meets the minimum standards set out in this policy.
- Require the partner organisation's relevant staff to sign SafeSport India's Commitment & Acknowledgement Form (Annex A).
- Include a safeguarding clause in all partnership agreements, MoUs, and contracts, making compliance with this policy a binding condition.
- Assess the partner's existing safeguarding capacity before finalising the partnership.

10.2 Ongoing Partner Monitoring

- Partner organisations' safeguarding arrangements will be monitored as part of ongoing programme management.
- If a serious safeguarding incident occurs within a partner organisation, SafeSport India must be informed as soon as possible. Partners must also take appropriate responsive action.
- If a partner fails to address a safeguarding concern appropriately, SafeSport India reserves the right to suspend or terminate the partnership.
- Partners wishing to sub-contract or sub-grant to further organisations must ensure those organisations are also bound by equivalent safeguarding requirements.

10.3 International Partners

Where SafeSport India works with international organisations or receives international visitors:

- International partners must meet equivalent safeguarding standards under their home jurisdiction and under this policy - whichever is higher.
- International visitors who will have contact with children or vulnerable adults must sign the Commitment & Acknowledgement Form and comply with Indian law (including POCSO).
- Where an international partner is involved in a safeguarding incident, the relevant embassy or consulate may be informed where appropriate.
- In countries with weaker child protection laws, Indian law and this policy's standards apply as the minimum.

11. Photography, Media & Communications

Images and stories of children and vulnerable adults can cause harm if they are used without consent, in an exploitative manner, or in a way that allows identification.

SafeSport India has a strict media policy.

11.1 Consent is Mandatory

- Consent must be obtained from the parent or guardian of any child (under 18) before any photograph, video, or audio recording is made or used. For adults, consent must be obtained from the individual.
- Consent forms must specify: what images will be used for and where they will be published. See Annex D.
- Consent may be withdrawn at any time. If consent is withdrawn, the relevant images must be removed from all SafeSport India holdings.

11.2 During Events and Programme Visits

- Only authorized personnel by SafeSport India may use cameras or recording devices at programme events involving children.
- Journalists, photographers, and media personnel must sign the Code of Conduct and obtain a media pass from SafeSport India before photographing or filming participants.
- No personal devices (including mobile phones) may be used to photograph or film children or vulnerable adults at SafeSport India events unless authorized.
- A designated SafeSport India staff member will be responsible for monitoring media conduct at every event.

11.3 Standards for Images

- Images must portray participants in a dignified, respectful, and positive light.
- Images must reflect the truth of the programme activity and not sensationalise or stereotype.
- Images that could be deemed sexual, that portray nudity, or that demean participants are **STRICTLY PROHIBITED**.
- Participants who have previously experienced abuse must not be identified visually or in text without exceptional justification and additional protections (e.g. voice only, pseudonym, location withheld).

11.4 Publication & Storage

- Images of children and vulnerable adults must not be accompanied by personal identifying information (full name, address, school name) that could make the individual traceable.
- All images must be stored securely, in access-restricted, password-protected systems.
- Images must not be stored on unencrypted storage services.
- Images must only be used for the purposes for which consent was given.

- A secure folder and database of consent forms and images will be maintained by the Safeguarding Coordinator.

12. Online Safety & Digital Safeguarding

The same safeguarding principles that apply in physical settings apply equally in online and digital environments.

12.1 Approved Platforms Only

- SafeSport India will designate approved digital platforms for all communications and online programme delivery with participants. Only these platforms may be used.
- Staff must not use personal social media, messaging apps (including personal WhatsApp), or personal email to communicate with participants.
- One-to-one online contact with a minor is not permitted. Group settings with more than one adult present are required.
- Where individual online sessions are operationally necessary, a parent or guardian must be present, or the session must be recorded with prior consent.

12.2 Age Appropriateness

- The minimum age for most social media platforms is 16. SafeSport India will not ask or permit children under 16 to use social media platforms for any programme purpose.
- Age verification procedures must be in place for any online community or platform used with participants.

12.3 Content & Behaviour Standards Online

- All Code of Conduct standards apply equally online. Harassing, bullying, shaming, or sexually explicit behaviour online is treated with the same seriousness as in-person misconduct.
- Staff must never share personal information, images, or stories about participants on personal social media.
- Screenshots of sessions involving children or vulnerable adults must not be taken or shared.
- Staff must use separate professional accounts for all programme-related online engagement.

12.4 Cyberbullying & Online Exploitation

- SafeSport India takes cyberbullying among and against participants seriously. Any instance must be reported to the Safeguarding Coordinator.
- Online grooming is a criminal offence. Any concern about grooming must be reported immediately to the Safeguarding Coordinator.

- Child Sexual Abuse Material (CSAM) - including viewing, possessing, or sharing - is a serious criminal offence under the POCSO Act and IT Act. Any discovery must be reported to police and Safeguarding Coordinator immediately.

12.5 Guidance for Parents & Guardians

SafeSport India will provide parents and guardians with clear guidance on:

- Which digital platforms SafeSport India uses and why
- How to monitor their child's online safety
- How to report an online concern to SafeSport India or to authorities

13. Recognising Abuse & Harm

You do not need to be certain that abuse has occurred to report a concern. If something feels wrong, report it. The Safeguarding Coordinator will assess the situation.

Abuse can take many forms. It can be carried out by adults or other children, in person or online, by strangers or by people well-known to the child.

TYPE OF ABUSE	WHAT IT INCLUDES	POSSIBLE SIGNS
Physical Abuse	Hitting, slapping, burning, pushing, shaking, hair-pulling, use of objects to cause injury, physical punishment or 'discipline'	Unexplained bruises, burns or injuries; flinching at sudden movements; fear of going home; wearing long sleeves to hide marks
Emotional / Psychological Abuse	Constant criticism, humiliation, threats, belittling, isolation, ignoring, verbal abuse, controlling behaviour, bullying including cyberbullying	Low self-esteem; withdrawal from activities; excessive anxiety or fearfulness; sudden changes in behaviour; self-harm
Sexual Abuse	Any sexual act or behaviour involving a child; showing pornography; sexual remarks; grooming; online sexual contact; exploitation; child marriage	Age-inappropriate sexual knowledge; sexual language or behaviour; unexplained physical injuries in genital area; withdrawal; nightmares; self-harm

Neglect	Persistent failure to provide basic physical, emotional, medical, or educational needs; failure to protect from harm; abandonment	Consistently unwashed, hungry, or poorly clothed; untreated medical issues; chronic absence from school/programme; fatigue
Exploitation (including Child Labour)	Using a child for work in ways that harm their development, deprive them of education, or expose them to danger; domestic servitude; trafficking	Working during school hours; fatigue; signs of fear; unexplained cash or gifts; restricted movement
Harmful Practices	Female Genital Mutilation (FGM); forced marriage; honour-based violence; discrimination based on disability, identity or caste	Extended absences; fear about upcoming travel; signs of distress about marriage or family plans
Online / Digital Abuse	Cyberbullying; sexting; grooming online; sharing sexual images; online exploitation; coercive digital control	Secretive online activity; distress after using devices; unexplained gifts from unknown online contacts; self-harm

14. Responding to a Disclosure

A disclosure happens when a child, young person, or adult tells you - directly or indirectly - that they have been harmed or are at risk of harm. How you respond in those first moments matters enormously.

14.1 DO: In the moment:

- Stay calm. Your calm reaction helps the person feel safe to continue.
- Listen carefully and give the person your full attention.
- Believe what is being said. Take it seriously.
- Use open, non-leading questions: 'Can you tell me more about that?' not 'Did they do X to you?'
- Reassure the person: 'You were right to tell me. This is not your fault.'
- Explain honestly that you cannot keep this secret but that you will only share it with the people who need to know to keep them safe.
- After the conversation, write down exactly what was said using the person's own words as much as possible and note the date, time, and location.

14.2 DO NOT: In the moment:

- Do not promise confidentiality or that you will keep this a secret.
- Do not express shock, disbelief, or blame.
- Do not investigate, probe for detail, or ask leading questions.
- Do not confront the alleged abuser.

Note



Your role is to LISTEN, REASSURE, and REPORT. It is NOT your role to investigate, judge, or decide whether abuse has occurred. Leave that to the Safeguarding Coordinator and relevant authorities.

15. Reporting Procedures

15.1 How to Report

Any concern - however minor it may seem - must be reported. There is no such thing as a 'not serious enough' concern.

IMMEDIATE SAFETY: If the person is in immediate danger or a crime is taking place, call the Police (100) or Childline (1098) or Women's Safety (109) or Ambulance (108) FIRST. Do not wait.

REPORT TO SAFEGUARDING COORDINATOR: Contact the SafeSport India Safeguarding Coordinator by phone or in person. Do not use email as the first point of contact for urgent matters. Report the concern ideally within 1 hour, and no later than the same working day.

COMPLETE THE INCIDENT REPORT FORM: Complete the Safeguarding Incident Report Form (Annex B) as soon as possible, providing as much detail as you have. Submit this to the Safeguarding Coordinator. Mark the email: URGENT. CONFIDENTIAL.

DO NOT INVESTIGATE: Do not discuss the concern with the alleged perpetrator or with colleagues beyond what is necessary. The Safeguarding Coordinator will manage next steps.

SUPPORT THE PERSON: Check that the person who disclosed is safe. Do not leave them alone if they are in immediate distress. Refer to emergency support if needed.

15.2 Anonymous Reporting

Any person may make an anonymous report to the Safeguarding Coordinator by email at info@safesportindia.com or to the Safeguarding Coordinators independently

(Aman Jain - amanjain@safesportindia.com or Rania Mecca - raniamecca@safesportindia.com). Anonymous reports will be taken seriously and investigated to the extent possible.

15.3 Whistleblowing

If a concern relates to the conduct of the Safeguarding Coordinator themselves, or to a very senior member of SafeSport India leadership, the report should be made directly to the Safeguarding Coordinators (info@safesportindia.com).

15.4 Statutory Reporting Obligations

Under the POCSO Act 2012, any person with knowledge or suspicion of a sexual offence against a child is LEGALLY REQUIRED to report it to the local police or Special Juvenile Police Unit (SJPU). SafeSport India's reporting process does not replace this legal obligation. The Safeguarding Coordinator will typically manage the statutory report on behalf of the organisation, but any individual who has direct knowledge of a POCSO offence has an independent legal duty to report.

16. Incident Investigation & Management

16.1 Initial Assessment (within 24–48 hours)

Upon receiving a safeguarding report, the Safeguarding Coordinator will:

- Assess whether there is immediate risk to any person's safety and take urgent action if required (including notifying police or emergency services).
- Convene a Safeguarding Committee meeting within 24–48 hours
- Determine whether the matter constitutes a serious incident or a minor incident (see classifications below).
- Record the report and all subsequent actions in the secure safeguarding log.

16.2 Incident Classification

CLASSIFICATION	EXAMPLES	RESPONSE
SERIOUS INCIDENT	Any sexual abuse, rape, molestation, exploitation, trafficking, serious physical assault, child marriage, child pornography, sustained emotional abuse, criminal conduct	Immediate police notification; Safeguarding Committee; Board notification; full investigation; external support for survivor
MODERATE CONCERN	Boundary violations, inappropriate communications,	Safeguarding Committee assessment; potential

	repeated or systematic Code of Conduct breaches, online safety concerns	disciplinary action; additional training; review of procedures
MINOR INCIDENT	Single Code of Conduct breaches (e.g. missing a training, one-to-one with minor without notification), low-level boundary concern	Recorded by Safeguarding Coordinator; addressed with individual through line manager; monitored

16.3 Investigation Principles

- All investigations must be objective, impartial, transparent, and guided by professional expertise.
- The alleged perpetrator is presumed innocent (unless POCSO case) until the investigation is complete.
- All parties must be treated fairly and have the right to respond to allegations.
- Investigations must be completed within 2 weeks of the initial report, unless the complexity of the matter requires longer, in which case an interim update must be provided.
- SafeSport India may engage external investigators or safeguarding consultants for serious or complex cases.
- If a criminal investigation is underway, SafeSport India will cooperate fully with police and will not conduct a parallel internal investigation that could compromise the criminal process.
- All investigation records must be stored securely and confidentially by the Safeguarding Coordinator and shared only on a strict need-to-know basis.

16.4 Outcomes & Actions

- Outcomes may include: disciplinary action (up to and including immediate dismissal), retraining, policy changes, referral to police, referral to Child Welfare Commission (CWC), civil proceedings, or contract termination.
- If allegations are found to be false and made in good faith, no action will be taken against the reporting person.
- If allegations are found to be maliciously false, disciplinary action may be taken against the person who made the report.
- All outcomes and findings will be reported to the Leadership.

17. Survivor Support

The wellbeing and recovery of anyone who has experienced abuse or harm is SafeSport India's primary concern throughout and after any safeguarding process.

17.1 Immediate Support

Immediate medical attention must be arranged if required. Sexual and physical abuse requires urgent medical care.

The survivor must be made safe and must not be left alone if distressed.

The survivor's wishes about who they want to be with and what they want to happen should be respected to the fullest extent possible, consistent with their safety.

17.2 Ongoing Support

SafeSport India will, within its available resources, facilitate or refer the survivor to appropriate support services including medical, psychological/counselling, legal, and social care support.

Survivors will be kept informed - in an age-appropriate way - of actions taken and the progress of any investigation.

The survivor's confidentiality and dignity must be protected at all times. Identity must never be disclosed publicly.

17.3 Support for Reporting Persons & Investigation Team

Staff or volunteers who have received a disclosure or been involved in an incident investigation may experience trauma. SafeSport India will offer debriefing and refer them to counselling support.

The emotional wellbeing of the person who reported the concern will be checked by their Safeguarding Coordinator.

18. Confidentiality & Data Protection

Safeguarding information is among the most sensitive information an organisation can hold. It must be handled with the greatest care.

- All safeguarding information must be treated as strictly confidential and shared only on a need-to-know basis.
- Written correspondence must be marked 'Strictly Confidential. Addressee Only' and sent only to authorised recipients.
- Safeguarding reports and records must never be sent through general or shared email accounts.
- The designated safeguarding email (info@safesportindia.com) is accessible only to the Safeguarding Coordinators.
- All records must be stored in a secure, access-restricted system (digital or physical). Physical records must be in locked storage.
- The identity of the child or vulnerable adult involved in any safeguarding matter

must never be disclosed publicly or to the media. This is also a legal requirement under POCSO.

- Safeguarding records must be retained securely for the period required by law (typically 7 years for adults, until the child turns 25 for child-related matters) and then securely destroyed.
- SafeSport India complies with the Information Technology Act 2000 and applicable data protection obligations in relation to the collection, storage, and use of personal data.



Note

Confidentiality is not an absolute obligation. When the safety of a child or vulnerable adult is at risk, information may and must be shared with appropriate authorities, regardless of any expressed desire for secrecy.

19. Whistleblowing & Non-Retaliation

SafeSport India recognises that it takes courage to raise a safeguarding concern, particularly when it involves a colleague or a person in a position of authority.

- No person who raises a safeguarding concern in good faith will face any retaliation, victimisation, disadvantage, or adverse treatment - regardless of the outcome of any investigation.
- This protection applies even if the concern is investigated and found to be unsubstantiated, as long as it was raised honestly and in good faith.
- Retaliation against a person who has raised a safeguarding concern is itself a serious disciplinary offence.
- Anyone who feels they have experienced retaliation for raising a concern should report this directly to the Safeguarding Coordinator.
- If a concern relates to the most senior leadership of SafeSport India, the person may report anonymously to info@safesportindia.com.

20. International & Cross-Border Safeguarding

SafeSport India works with international companies and organisations and may receive international visitors or send participants overseas. Robust safeguarding standards apply regardless of borders.

- All international partners must comply with safeguarding standards equivalent to or higher than this policy and applicable Indian law.
- When the safeguarding laws of another country provide less protection than Indian law, Indian law and this policy apply as the minimum standard.
- International visitors who will interact with children or vulnerable adults must complete the same pre-engagement requirements as Indian representatives (background check, policy sign-off, induction).
- If a safeguarding incident involves a foreign national, the relevant embassy or high commission may be informed as appropriate.
- In countries with weak child protection legislation, offenders may be prosecuted under Indian law (where applicable) or under the laws of their home country. SafeSport India will seek legal advice in such situations.
- Any programme involving children or athletes travelling internationally must include a specific cross-border risk assessment and an international and Indian safeguarding protocol.

21. Policy Monitoring & Review

- This policy will be reviewed and, if necessary, updated at least annually by the Safeguarding Coordinator in consultation with the Leadership.
- The policy will also be reviewed immediately following any serious safeguarding incident, any change in Indian law or regulation, or any significant change in SafeSport India's programmes or operations.
- All safeguarding concerns, reports, and incidents will be recorded, monitored, and reported to the Leadership by the Safeguarding Coordinator at least quarterly.
- SafeSport India will maintain a safeguarding action plan that is reviewed annually.
- This policy will be published on the SafeSport India website and included in all staff and partner onboarding materials.
- All staff and partners will be notified of any material revisions to this policy and required to re-sign the Commitment & Acknowledgement Form.

Annex A: Commitment & Acknowledgement Form

Note



This form **must be completed by ALL SafeSport India staff**, volunteers, coaches, teachers, administrators, contractors, and partner representatives before commencing any work or activity involving children, young people, athletes, or vulnerable adults.

I, the undersigned, confirm that:

- I have received, read, and understood the SafeSport India Safeguarding Policy (Version 1.0, 2025).
- I understand and accept my individual responsibility to report any safeguarding concern to the Safeguarding Coordinator.
- I agree to comply with all provisions of this policy and the Code of Conduct at all times.
- I understand that a breach of this policy may result in disciplinary action, including dismissal or contract termination, and may constitute a criminal

offence under Indian law.

- I commit to completing the required safeguarding training for my role within the timeframe specified.
- I will update this commitment annually.

Full Name:	
Position / Role:	
Organisation / Partner Name:	
Date:	
Signature:	

Return completed form to: Safeguarding Coordinator, SafeSport India.

Email: info@safesportindia.com

Annex B: Safeguarding Incident Reporting Form

Confidential



Do not share this form with any unauthorised personnel. Mark any email containing this form as: URGENT. CONFIDENTIAL.

Submit to: info@safesportindia.com

Section 1: Details of Person Reporting

Full Name:	Date & Time of Report:
Organisation/Role:	Contact Number:
Email:	Relationship to Subject:

Section 2: Details of the Person Affected

Name (if known):	Age / Date of Birth:
Gender:	Any known disability:
School / Organisation:	Parent/Guardian Name & Contact:

Section 3: Details of the Concern / Incident

Please provide as much detail as possible. Include: who, what, where, when. Use the person's own words where possible.

Type of concern (tick all that apply): <input type="checkbox"/> Physical <input type="checkbox"/> Sexual <input type="checkbox"/> Emotional <input type="checkbox"/> Neglect <input type="checkbox"/> Exploitation <input type="checkbox"/> Online Safety <input type="checkbox"/> Other: _____
Description of concern (include date, time, location, observations, exact words used):
Is the person currently safe? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown. If No, describe immediate risk:

Section 4: Alleged Perpetrator (if known)

NOTE: The alleged perpetrator must be presumed innocent (unless POCSO case) until the investigation is complete. DO NOT inform them that this report has been made.

Name (if known):	Age / Gender:
Relationship to affected person:	Position / Role:
Current whereabouts (if known):	Any other relevant information:

Section 5: Action Taken

Has emergency medical care been sought? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable
Have police or SJPU been notified? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, reference number: _____
Other actions taken (describe):

Declaration: I confirm that the information provided above is true and accurate to the best of my knowledge.

Signature: _____ Date: _____

Annex C: Risk Assessment Template

Complete this form before any SafeSport India programme, event, or activity involving children, young people, athletes, or vulnerable adults.

Activity / Programme Name:	Date / Period:
Location:	Lead Person:
Number of Participants:	Number of Adults / Staff:

RISK IDENTIFIED	SEVERITY (H/M/L)	LIKELIHOOD (H/M/L)	RATING	MITIGATION / CONTROLS

Approved by Safeguarding Coordinator: _____ Date: _____

Annex D: Photography & Media Consent Form



Note

This form must be completed before any photograph, video, or audio recording is taken of a participant. No images may be used without a signed consent form on file.

SafeSport India is committed to protecting the identity and dignity of all participants. Images will only be used for the purposes stated in this form and will be stored securely.

Part 1: Details

Name of participant:	Age of participant:
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Programme / Activity:	Date:
Name of parent/guardian (if under 18):	Contact number:

Part 2: Consent

I give permission for SafeSport India to use photographs, videos, and/or stories of the above-named participant for the following purposes (please tick):

- Programme reports and internal documentation
- SafeSport India website and official social media
- Print publications and promotional materials
- Media partnerships and press releases (with editorial review)
- Training and awareness materials

I understand that: SafeSport India will not use identifying personal information (full name, home address, school name) alongside images. I can withdraw this consent at any time by contacting info@safesportindia.com. Withdrawal of consent will be actioned promptly.

Signature of participant (if 18 or over): _____ Date: _____

Signature of parent/guardian (if participant is under 18): _____ Date: _____

Name of parent/guardian (printed): _____

SafeSport India representative collecting consent: _____ Date: _____