

Policy on Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

INTRODUCTION

Miracle Foundation India takes a zero-tolerance approach to sexual exploitation, abuse, and harassment, characterized by humanity, independence, neutrality, and impartiality in its actions and behaviour. Our organisation does not tolerate any form of sexual harassment, sexual abuse or sexual exploitation and considers such acts as serious misconduct, which constitutes grounds for disciplinary measures.

In this PSEAH Policy, Miracle Foundation India is committed to the protection from sexual exploitation, abuse and harassment (PSEAH) by its members and recognizes the vulnerability of every person regardless of gender, but also recognizes the particular vulnerability of women and children to sexual exploitation, abuse and harassment (SEAH). We have an obligation to use our power respectfully and must not abuse the power and influence we have over the lives and well-being of any of our stakeholders.

Note: This policy is to be read in conjunction and in addition to the child Safeguarding Policy (CSP) when it comes to safeguarding and protection of Children.

Key points from the statement include:

- **Zero Tolerance:** The organization has a strict policy of not tolerating any form of sexual exploitation, abuse, or harassment.
- **Scope:** This policy applies to a wide range of individuals associated with Miracle Foundation India, including employees, partners, consultants, contractors, agents, volunteers, social workers, resource centers and visitors. It also extends to individuals involved in social master training and anyone associated with the organization's work.
- **Protection for Vulnerable Adults:** The statement emphasizes that this commitment to prevention and accountability is particularly important when working with vulnerable adults, ensuring their protection.
- **Equal Right to Protection:** It highlights that all adults, regardless of personal characteristics such as age, gender, ability, culture, race, religion, or sexual identity, have an equal right to protection.

Sexual Exploitation and Abuse and Sexual Harassment at the workplace or in the course of official duties, if involving employees of the Organization shall be considered a grave offense and is therefore punishable under the applicable laws.

A. Purpose

The purpose of this PSEAH policy is to ensure that all employees of Miracle Foundation India make ethical decisions in their professional and personal lives to ensure the protection of people, particularly children and vulnerable adults, protecting them from sexual exploitation, abuse and harassment (SEAH) and to ensure that the activities of our team are implemented in a safe and protective environment as far as reasonably possible and responded to effectively. The Miracle Foundation India's PSEAH Policy has been developed in accordance with the six core principles:

Six Core Principles:

- SEAH by Miracle Foundation employees and related personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Any sexual relationship between Miracle Foundation India employees or related personnel and beneficiaries of assistance or other vulnerable members of the local community that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of aid work.
- Where Miracle Foundation India employee or related personnel develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, he or she must report such concerns via established reporting mechanisms.
- All Miracle Foundation India employees and related personnel are obliged to create and maintain an environment which prevents SEA and promotes the implementation of this policy.
- Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

B. Scope

This Policy defines the extended ethical principles, attitudes and practices of the Code of Conduct that are binding for all Miracle Foundation India employees as well as persons working under the name and legal status of Miracle Foundation India (interns, volunteers, Members of the Honorary Foundation Board, consultants).

Employees are also expected to behave according to these principles even outside working hours and beyond their place of work. For Third Party-Personnel, a standard PSEAH clause is to be included in the relevant agreements between Miracle Foundation India and the third-party. This policy does not apply to cases of harassment and sexual misconduct between Miracle Foundation India employees. Such cases are addressed separately in the Regulations on Sexual Harassment in the Workplace (POSH Act).

C. Definition

Sexual abuse- an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Abuse is defined as any action that intentionally or unintentionally harms or injures another person. In many cases, it is characterized by unbalanced power relationships between stakeholders (the abuser and the victim)

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

Sexual harassment – a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating. Sexual harassment has widely been understood to relate to the workplace ‘Workplace sexual misconduct’ but is also included in the spectrum of behaviours that are not acceptable conduct by our staff, be it in the workplace or outside.

Sexual harassment can take the form of words, gestures or deeds. It can be perpetrated by individuals or groups. More specifically, this refers among others to:

- Verbal comments of a sexual nature, such as suggestive and/or lewd remarks about the appearance of employees, sexist comments, jokes or questions about the sexual characteristics, sexual behaviour, sexual orientation of women or men.
- Non-verbal such as pornographic material or explicit images being shown, hung up or distributed in the workplace, staring, sexual gestures or written comments of a sexual nature.
- Physical such as unwanted physical contact, touching, stalking, and assault, coercion or rape (this includes attempts and threats to do these things).

The deciding factor is not the intention of the person doing the harassing, but how their behaviour affects the person concerned and whether they feel it is wanted or unwanted. An action or behaviour can still be considered sexual harassment even if the alleged harasser did not intend for it to be harmful. Communication and explanation from both sides are important in this context.

Sexual misconduct – includes sexual harassment, sexual exploitation and sexual abuse.

Complainant – A complainant can be a person who has been subject to sexual exploitation & abuse and harassment and / or any person reporting an incident of sexual exploitation & abuse and harassment. A third party can also be a complainant; however, a written complaint from the person who has been subject to sexual exploitation & abuse is mandatory to be filed with “IC” as the case may be. In cases of PSEA, the complainant can be a child or an adult of any gender from the benefitting community of Miracle Foundation India.

Respondent: A person or group of persons who is alleged / reported to have committed an act of Sexual Exploitation & Abuse or sexual harassment.

Confidentiality – an ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorised people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organisation.

Safeguarding – the responsibility of organisations to make sure their staff, operations, and programmes do no harm to children and adults at-risk nor expose them to abuse or exploitation. This term covers physical, emotional and sexual harassment, exploitation and abuse by employees and associated stakeholders, as well as safeguarding risks caused by programme design and implementation.

D. Key principles

The policy is underpinned by the following principles. The principles reflect Miracle Foundation India's commitments to address SEAH.

- I. **Zero tolerance policy:** Miracle Foundation India pursues a zero-tolerance policy towards sexual exploitation and abuse. This means that all perpetrators must be held accountable. Sexual exploitation and abuse by employees are never acceptable, constitute gross misconduct and are therefore grounds for termination of employment.
- II. **Strong leadership set organisational culture:** Leaders set organisational culture. Miracle Foundation India expects its leaders to set clear expectations and model respectful behaviour in their interactions at work. This will support communities, survivors and whistleblowers to feel safe, report concerns and be assured their allegations are taken seriously. Strong leaders address SEAH by taking measures to improve diversity and inclusion.
- III. **Survivor-centred approach and access to justice:** Miracle Foundation India prioritise the rights, needs, and wishes of the survivor and ensure procedural fairness to all parties. We never encourage survivors to take a particular course of action. It is crucial that we listen to those who seek help and ask every survivor what they feel is the best option, and not just do what we think is best. The approach means:

Do no harm: no action should be taken that would worsen the situation of a survivor of sexual exploitation or abuse.

Respect: all actions taken are guided by respect for the choices, wishes, rights and dignity of the survivor.

Confidentiality: There must be strict adherence to confidentiality regarding the survivor's identity and other identifying information in every aspect of case handling. All actions are to be taken to ensure that any matter is handled in full confidentiality.

Non-discrimination: Miracle Foundation India provides equal and fair treatment to anyone in need of help due to an SEAH incident involving Miracle employees.

- IV. **PSEAH is a shared responsibility:** Preventing sexual exploitation, abuse and harassment is everyone's responsibility.
- V. **Gender inequality and other power imbalances are addressed:** Power relations are crucial for inequalities based on differences between worker and beneficiary, men and women, ability and disability, ethnic and indigenous status, religion, gender identity and sexual orientation, age, health and poverty, which can also lead to SEAH. The intersection of gender with other forms of inequality can further increase the likelihood of SEAH occurring. Engagement with intended beneficiaries should be based on respect for diversity, promotion of gender equality and social inclusion, accountability, and a strong "do no harm" focus.

E. Reporting

Miracle Foundation India will ensure that safe, appropriate, accessible means of reporting SEAH concerns are made available to employees and the associated stakeholders. Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Miracle's Whistleblowing Policy. Miracle Foundation India will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a concern of SEAH

All employees are strongly encouraged to report in good faith any instances of sexual exploitation and abuse of which they become aware. Reporting complaints should be submitted, and all complaints received will be treated confidential and will only be disclosed to those who have a legitimate need to know.

Reporting complaint or concern relating to SEAH should be reported immediately to the Internal Committee (IC) email ID icc@miraclefoundation.org

I. The Internal Committee (IC) details are as follows: PSEA Committee (Prevention of Sexual Exploitation and Abuse)

Presiding Officer: Ms. Shalini Gulati	:	External NGO member
Ms. Sandhya Mishra	:	Sr. Director, Govt. Partnership & Strategic Alliance)
Mr. Somnath Dutta	:	Sr. Director Finance (CFO)
Mr. Arghya Mukherjee	:	Sr. Director Program
Ms. Swaranjali B Thorat	:	State Head West
Ms. Priya Pandey	:	Head HR & Legal

Focal Point: As part of our commitment to the Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH), we have established a dedicated Focal Point responsible for overseeing the implementation of the PSEAH Policy within our organization. The Focal Point serves as the primary contact person for all matters related to PSEAH, including receiving reports of alleged incidents, coordinating responses, and ensuring compliance with relevant policies and procedures.

The Focal Point is appointed based on their expertise in safeguarding and protection issues, and they receive The details of the focal points are:

- 1) Ms. Priya Pandey :Head HR & Legal (9716047913, priya@miraclefoundation.org)
- 2) Mr. Arghya Mukherjee: Sr. Director Program (9934013152, arghya@miraclefoundation.org)

II. Response

When made aware of an alleged breach of the Miracle Foundation India PSEAH Policy, organization will:

- Take appropriate action to the best of its capacity to protect persons from retaliation when allegations of sexual exploitation, abuse and harassment are made in good faith.
- Investigate allegations of sexual exploitation, abuse and harassment in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
- Report to Authorities: Any action taken will be in accordance with organizations policies and procedures. Depending on the nature and circumstances of the case, as well as the interest of the complainant, we will involve the appropriate authorities.
- Take swift and appropriate action, including legal action when required, against employees and related personnel who commit sexual exploitation and/or abuse.
- Take swift and appropriate action against those who were aware of such abuse/exploitation but did not report it.
- Respond with a ‘survivor centred approach’, offering support to complainants/survivors of harm caused by any employee, regardless of whether a formal internal response is carried out (such as an internal investigation).
- Apply appropriate disciplinary measures to staff found in breach of the policy.

All Miracle Foundation India’s employees are made aware of the reporting mechanisms for SEAH by ensuring that reporting lines.

III. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with SEAH concerns, information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should always be kept secure.

iv. Complaint Redressal Timelines

Process	Timeline
Submission Of Complaint	Within 3 months of the last incident
Notice to Respondent	Within 7 working days of the receiving complaint
Respondent’s Submission	Within the next 10 working days
Completion of Enquiry	Within 90 days

Submission of Report to IC	Within 10 days of completion of enquiry
Implementation of the recommendation	Within 60 days
Appeal	Within 60 days of recommendation

F. Risk Management

Miracle Foundation India will audit its operations annually to ensure that PSEAH is being addressed correctly in 4 components:

- a) Policy: the PSEAH policy is applied to all employees, and it is easily accessible to all staff, and fully understood by all.
- b) Procedures: systems are in place to reduce risks of abuse, rumours and the possibility of harm
- c) People: staff are recruited, managed and work in an environment that addresses PSEAH through support, training, information and response.
- d) Accountability: systems are in place to receive and respond to concerns, and to recognize and limit risks.

G. Awareness Raising Plan

Objective: To raise awareness among personnel, beneficiaries, and local communities about Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH) and the organization's relevant policies and procedures.

By implementing these Awareness Raising Plans, the organization can effectively raise awareness and promote a culture of safety, respect, and accountability in addressing PSEA issues within its programs and communities.

1. Workshops and Training Sessions:

- Conducting interactive workshops and training sessions for personnel, beneficiaries, and community members.
- Including presentations, role-plays, and group discussions to facilitate learning and engagement.
- Covering topics such as understanding PSEA, recognizing signs of exploitation and abuse, and reporting procedures.

2. Peer Education Programs:

- With peer education programs involving trained volunteers or community leaders.
- Organizing peer-led discussions, forums, or support groups to raise awareness and share information on PSEA.
- Encourage open dialogue and provide a safe space for participants to ask questions and seek guidance.

3. Information Campaigns:

- Display posters in visible locations within communities, at training centres and offices.
- Distribute informational materials during community events, meetings, and outreach programs.

4. Community Meetings and Dialogues:

- Organize community meetings and dialogues to discuss PSEA issues and concerns.
- Invite local leaders, representatives from partner organizations, and relevant stakeholders to participate.
- Facilitate discussions on identifying risks, promoting protective measures, and fostering community support networks.

5. Youth Engagement:

- Collaborate with youth of the organizations to spread out PSEAH awareness
- Conduct classroom sessions, workshops, and peer-led initiatives to empower young people with knowledge and skills to protect themselves and others from exploitation and abuse.

6. Feedback Mechanisms and Follow-Up:

- Establish feedback mechanisms to gather input from the target audience on the effectiveness of awareness-raising activities.
- Use feedback to refine messaging, adapt strategies, and address emerging concerns.
- Follow up with participants to reinforce key messages, provide additional support, and track behavioural changes over time.

By implementing these specific action plans we aim to effectively raise awareness and promote a culture of safety, respect, and accountability in addressing PSEA issues within its programs and communities.

H. Training Plan

A. Annual Training plan that is evenly spread-out / regular with respect to mandatory training on PSEAH.

Annual Training Plan: Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH)

Objective: To ensure all our staff receive comprehensive training on preventing sexual exploitation, abuse, and harassment, fostering a safe and respectful workplace culture.

Annual Plan : January - December [2024]

Training Components:

1. Orientation Training (Quarter 1):

- Introduction to PSEAH Policy and Organizational Commitment
- Legal Framework and Compliance Requirements
- Reporting Procedures and Support Resources

2. Role-Specific Training (Quarter 2):

- Tailored Training for Managers and Supervisors on Responding to PSEAH Incidents
- Training for HR Personnel on Handling PSEAH Complaints and Investigations

3. Refresher Training (Quarter 3):

- Review of PSEAH Policy & Updates.
- Reinforcement of PSEAH & POSH Policy

4. Awareness Campaigns and Workshops (Quarter 4):

- Interactive Workshops on Diversity, Inclusion, and Respectful Workplace Behaviours
- Distribution of Educational Materials and Resources

Training Delivery Methods:

- In-Person Workshops
- Virtual Training Sessions

Evaluation and Feedback:

- Participant Surveys to Gather Feedback on Training Effectiveness and Relevance
- Analysis of Reporting Trends and Incident Data to Assess Impact of Training

Monitoring and Compliance:

- Regular Audits of Training Records and Attendance
- Review of Compliance with Reporting Procedures and Response Protocols



Continuous Improvement:

- Incorporation of Feedback into Training Content and Delivery Methods
- Ongoing Review and Update of Training Materials to Reflect Best Practices and Emerging Trends.

By implementing this Annual Training Plan for PSEAH, we aim to cultivate a culture of respect, dignity, and accountability within our organization, where every employee feels safe and empowered to contribute to a positive work environment.

Below is the formal framework to ensure the effectiveness and sensitivity of the training.

1. **Policy Familiarization:** All staff will be familiarized with our organization's PSEAH policy. The focus will be to ensure staff understand the definitions of sexual exploitation, abuse, and harassment as outlined in the policy.
2. **Training Objectives:** The objectives of the training session are to include raising awareness about PSEAH, understanding the impact of such behaviours, and learning how to prevent and respond to incidents.
3. **Legal Framework:** Providing an overview of relevant laws and regulations pertaining to PSEAH both for the organization and individual staff members.
4. **Reporting Mechanisms:** Clearly explaining the reporting mechanisms available within the organization for staff to report incidents of PSEAH. Ensuring staff understand the confidentiality and protection measures in place for whistleblowers.
5. **Sensitivity Training:** The primary aim of sensitivity training is to promote empathy, respect, and appreciation for individuals from diverse backgrounds, including differences in race, ethnicity, gender, sexual orientation, religion, disability, and socioeconomic status.
6. **Cultural Sensitivity:** Acknowledge and address cultural differences that may impact perceptions of PSEAH.
7. **Accountability:** The importance of individual and collective accountability in preventing PSEAH.
8. **Leadership Commitment:** The commitment of organizational leadership to PSEAH prevention. We Encourage leaders to actively support and promote a culture of zero tolerance for PSEAH.

I. SEAH Safe Recruiting Methods

Notification in Job Announcements: We include a sentence in job announcements notifying candidates that background and reference checks will be conducted, and ethics is part of annual performance appraisals.

Applicant Self-Declaration: We require applicants to self-declare prior issues of sexual or other misconduct, termination of past employment, criminal records, and concerns registered with government authorities regarding contact with children, and to consent to the disclosure of any such information by their former employers during verification of references.

Background Checks: We conduct background checks, such as police records and Google searches, and contact references to vet for former misconduct in accordance with local laws regarding employment, privacy, and data protection.

Gender-Balanced Interview Panels: We ensure gender-balanced interview panels during hiring processes and conduct gender-neutral interviews.

Ethics Interview Questions: We ask candidates interview questions about ethics and ethical dilemmas to assess their alignment with organizational values and ethical standards.



Code of Conduct Review: We require candidates to review and sign the code of conduct before being offered a contract.

PSEAH Clause in Employment Contracts: We include a Prevention of Sexual Exploitation and Abuse (PSEAH) clause in employment contracts, including when subcontracting.

Disciplinary Measures: We outline disciplinary measures in the event of proven Sexual Exploitation and Abuse (SEAH) allegations, such as termination of contract.

PSEAH Training: We include training in PSEAH as part of the onboarding process and provide refresher courses at regular intervals during employment tenure.

Adherence to Code of Conduct in Performance Appraisals: We include adherence to the code of conduct, including participation in PSEA training, in performance appraisals of staff.

Effectiveness in Preventing SEAH: We would include in the performance appraisals of staff, their effectiveness in creating and maintaining an environment that prevents and responds to SEAH.

Freeze Professional Advancement/Recruitment Opportunities: We would freeze professional advancement/recruitment opportunities of individuals under investigation for SEAH.

Robust Disciplinary Action: In cases of confirmed misconduct, we take robust disciplinary action, such as dismissal, suspension, written censure, or other administrative/corrective measures, and consider reporting the incident to local law enforcement authorities if it involves possible criminal conduct.

Maintain Internal Database: We maintain an internal database documenting any disciplinary measures on personnel, including dismissals, to avoid rehiring them at a later point in time.

Share Relevant Information: We systematically share relevant information of personnel known to have committed SEA with other potential employers during background checks, to the extent legally possible.

These measures collectively ensure a safe and ethical recruitment process and foster a work environment free from sexual exploitation, abuse, and harassment.

J. Whistle-blower policy

Preface: The Foundation upholds fairness, transparency, and ethical conduct in all its operations. We value professionalism, honesty, and integrity. Our Code of Conduct guides our actions, emphasizing the highest standards of behavior. Any violation, regardless of its perceived significance, concerns us deeply. We recognize the vital role of employees and stakeholders in identifying breaches of our Code.

Raising Concerns: We urge employees, customers, suppliers, and stakeholders to report any actual or potential violations of our Code, policies, or laws. We also encourage disclosing any misconduct inconsistent with our values. Reporting avenues include reaching out to immediate line managers, the Human Resources department, or utilizing our designated Whistleblower channels. Retaliation against whistleblowers is intolerable and will result in disciplinary action.

Whistleblower Policy: This Policy establishes a mechanism for employees and stakeholders to approach the Ethics Committee to report concerns, including those related to Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH).

Definitions:

- **Ethics Committee:** Oversees whistleblower complaints and investigations.
- **Employee:** Includes all Foundation staff, whether full-time, part-time, or contractual.
- **Code:** Refers to the Miracle Foundation India Code of Conduct.
- **Investigators:** Individuals authorized to conduct investigations.
- **Protected Disclosure:** A good-faith communication revealing unethical or improper activity.
- **Stakeholders:** Encompasses vendors, suppliers, customers, and other associates.
- **Subject:** Person implicated in a Protected Disclosure.
- **Whistleblower:** Employee or stakeholder making a Protected Disclosure.

Scope:

- This Policy supplements our Code of Conduct and includes provisions for reporting instances of PSEAH.
- Whistleblowers play a crucial role in identifying and addressing PSEAH concerns.

Eligibility: All Foundation employees and stakeholders can make Protected Disclosures related to Foundation matters, including PSEAH incidents.

Disqualifications: Abusing whistleblower protection will lead to disciplinary action. False allegations or malicious intent related to PSEAH will not be tolerated.

Procedure:

- All Protected Disclosures related to PSEAH should be directed to the Ethics Committee.
- Disclosures should be factual and comprehensive, preferably in writing.
- Anonymity is discouraged but may be considered with credible information related to PSEAH.

Awareness:

The whistleblower policy includes initiatives to raise awareness related to PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) within the organization. This includes regular communication and



training sessions to educate employees and stakeholders about recognizing, reporting, and addressing instances of PSEAH. Awareness campaigns, workshops, and informational materials will be disseminated to ensure that all individuals understand their roles and responsibilities in preventing and responding to PSEAH. By fostering a culture of awareness and vigilance, we aim to create a safe and respectful environment for everyone associated with the organization.

Investigation:

- The Ethics Committee investigates Protected Disclosures related to PSEAH with sensitivity and confidentiality.
- Investigators may be involved as necessary, ensuring proper handling of PSEAH allegations.

Protection:

- Whistleblowers reporting instances of PSEAH are protected from unfair treatment, discrimination, or harassment.
- The Foundation supports whistleblowers facing difficulties arising from PSEAH disclosures.
- Whistleblower identities related to PSEAH are kept strictly confidential to the extent permitted by law.

Investigators:

- Investigators conducting investigations into PSEAH allegations adhere to ethical and legal standards.
- Investigations into PSEAH are handled with utmost care and sensitivity to the victims.

Decision: If instances of PSEAH are substantiated, appropriate disciplinary action is recommended to the Ethics Committee for approval.

Reporting: The Ethics Committee regularly reports to the Management on Protected Disclosures related to PSEAH and investigation outcomes.

Retention of Documents: Protected Disclosures and investigation results related to PSEAH are retained for at least seven years.

Amendment: The Foundation reserves the right to amend this Policy, with notice provided to trustees, employees, and stakeholders, ensuring compliance with PSEAH guidelines and regulations.

We do not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action. If you suspect that you or someone you know has been subjected to retaliation for raising a concern or for reporting a case, we encourage you to promptly contact your line manager, the Human Resources department or the Trustees of the Foundation.

The Whistleblower Policy has been formulated with a view to provide a mechanism for employees as well as other stakeholders of the Foundation to approach the "Ethic Committee".

Ethic Committee member Details:

Ms. Sandhya Mishra	:	Sr. Director, Govt. Partnership & Strategic Alliance)
Ms. Priya Pandey	:	Head HR & Legal

J. Prevention of Gender Based Violence

The Foundation is committed to preventing and addressing all forms of Gender-Based Violence (GBV) within its operations and among its stakeholders. This policy aims to provide guidelines for victim assistance and training on GBV awareness, prevention, and case management.

Gender Based Violence (GBV) refers to any harmful act that is perpetrated against an individual based on their gender or sex, or that disproportionately affects individuals of a particular gender. GBV encompasses various forms of violence, including physical, sexual, emotional, psychological, and economic abuse. It can occur in both public and private spheres, including within households, communities, workplaces, and institutions. GBV is rooted in unequal power dynamics between genders and is often used as a means to exert control, assert dominance, or reinforce discriminatory social norms. Examples of GBV include domestic violence, sexual harassment, rape, forced marriage, female genital mutilation, and trafficking.

Victim Assistance Guidelines:

1. **Immediate Support:** Victims of GBV shall receive immediate support, including access to medical care, counseling, and legal assistance as needed.
2. **Confidentiality:** The identity of GBV victims and all information related to their cases shall be kept confidential, respecting their privacy and dignity.
3. **Empowerment:** GBV victims shall be empowered to make informed decisions regarding their safety, well-being, and the pursuit of justice. They shall be provided with information about available support services and resources.
4. **Non-Discrimination:** All victims of GBV, regardless of gender, age, race, ethnicity, sexual orientation, or socio-economic status, shall receive equal and non-discriminatory assistance and support.
5. **Long-Term Support:** The Foundation shall facilitate access to long-term support services for GBV victims, including psychological counseling, vocational training, and economic empowerment initiatives to aid in their recovery and rehabilitation.

Training on GBV Awareness and Prevention:

1. **Mandatory Training:** All Foundation employees and stakeholders shall undergo mandatory training on GBV awareness and prevention, including recognizing signs of GBV, understanding its impact, and learning strategies for intervention and support.
2. **Tailored Training:** Training programs shall be tailored to address the specific needs and contexts of different stakeholders, including staff working in diverse settings and communities where GBV prevalence may vary.
3. **Regular Updates:** Training materials and resources on GBV awareness and prevention shall be regularly updated to reflect evolving best practices, legal frameworks, and emerging trends in GBV prevention and response.
4. **Accessible Resources:** Training materials and resources on GBV awareness and prevention shall be accessible in multiple languages and formats to ensure inclusivity and reach a diverse audience effectively.
5. **Partnerships:** The Foundation shall collaborate with external partners, including local NGOs, government agencies, and GBV experts, to enhance the quality and effectiveness of its GBV training programs.

Gender-Based Violence Case Management:

1. Reporting Mechanisms: The Foundation shall establish clear and accessible reporting mechanisms for GBV incidents, ensuring that victims can safely and confidentially report cases without fear of retaliation.
2. Investigation Protocols: GBV incidents shall be promptly and thoroughly investigated, following established protocols and procedures to ensure impartiality, transparency, and respect for the rights of all parties involved.
3. Supportive Environment: GBV victims shall be provided with a supportive environment throughout the case management process, including access to legal representation, advocacy, and accompaniment services as needed.
4. Coordination and Referral: The Foundation shall coordinate with relevant stakeholders, including law enforcement agencies, healthcare providers, and social service organizations, to ensure comprehensive support and referral services for GBV victims.
5. Monitoring and Evaluation: The Foundation shall regularly monitor and evaluate its GBV case management processes to identify areas for improvement and ensure compliance with applicable laws, regulations, and ethical standards.

By implementing these guidelines, the Foundation reaffirms its commitment to promoting gender equality, preventing GBV, and providing effective support and assistance to GBV victims within its sphere of influence. Together, we can work towards a world free from all forms of gender-based violence.



Kusum Mohapatra
Regional Director, CEO



Annexure 1

Details of the Internal Committee members:

Sl No	Name	Designation	Location	Email Id	Contact Number
1	Ms. Shalini Gulati	External NGO Member	Delhi	shalinigulati27@gmail.com	9811728765
2	Ms. Sandhya Mishra	Sr. Director, Govt. Partnership & Strategic Alliances	Delhi	smishra@miraclefoundation.org	9350560005
3	Mr. Somnath Dutta	Sr. Director Finance & Accounts	Delhi	sdutta@miraclefoundation.org	9650026377
4	Mr. Arghya Mukherjee	Sr. Director, Program	Delhi	arghya@miraclefoundation.org	9934013152
5	Ms. Priya Pandey	Head - Human Resource & Legal	Delhi	priya@miraclefoundation.org	9716047913