

SINDH CHILD PROTECTION POLICY



GOVERNMENT OF SINDH

Acronyms

AIG	Assistant Inspector General of Police
BHU	Basic Health Unit
BIC	Best Interest of Child
CP	Child Protection
CPC	Child Protection Court
CPIMS	Child Protection Information Management System
CPO	Child Protection Officer
CPU	Child Protection Unit
DC	Deputy Commissioner
DCC	District Coordination Committee
DCPU	District Child Protection Unit
FIA	Federal Investigation Agency
GoP	Government of Pakistan
GoS	Government of Sindh
ILO	International Labour Organization
IT	Information Technology
JJSA	Juvenile Justice System Act 2018
LHV	Lady Health Visitor
MICS	Multiple Indicator Cluster Survey
NADRA	National Database & Registration Authority
NGO	Non-governmental Organization
P&D	Planning and Development
PC-1	Planning Commission Form number 1
PDMA	Provincial Disaster Management Authority
PSS	Psychosocial Support
SBCC	Social & Behavioural Change Communication
SCPA	Sindh Child Protection Authority
SDGs	Sustainable Development Goals
SEL	Social & Emotional Learning
SOPs	Standard Operating Procedures

SWD	Social Welfare Department
UNCRC	United Nation's Convention on the Rights of Child
USB	Universal Serial Bus
WHO	World Health Organization

دراخت

Statement of Commitment

The Government of Sindh, through this Child Protection Policy, commits to protect children from all forms of abuse, violence, neglect and exploitation.

In this regard, the Government of Sindh will take all necessary measures such as: securing common conceptual understanding among all key stakeholders about child protection; building legal and procedural foundations; mandating duty-bearers for joint, integrated and synchronized actions to protect children from intentional or unintentional harm by setting child protection practices, procedures, programmes and services; building the capacities of social service workforce; ensuring effective and confidential data management; establishing accountability, monitoring and evaluation mechanisms and allocating public resources for children's protection in the province that comply with the Constitutional Provisions for children as well as the Government's Commitments under the United Nations Convention on the Rights of the Child (UNCRC).

Acknowledgment

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Table of Contents

STATEMENT OF COMMITMENT	3
ACKNOWLEDGMENT	4
TABLE OF CONTENTS	5
GLOSSARY	6
1 PREAMBLE	12
CONSTITUTIONAL AND INTERNATIONAL COMMITMENTS TO CHILD PROTECTION	13
2 VIOLENCE AND EXPLOITATION IN THE LIFE CYCLE OF CHILDREN	16
3 VISION & SCOPE	19
3.1 SCOPE	19
3.2 VISION	19
3.3 MISSION STATEMENT.....	19
3.4 AIM, GOAL & OBJECTIVES.....	20
3.5 CATEGORIES OF “STAKEHOLDERS” – CIRCLES OF SUPPORT AND HARM FOR GIRLS AND BOYS.....	20
4 GUIDING PRINCIPLES	22
5 GOVERNANCE FRAMEWORK FOR CHILD PROTECTION IN SINDH	25
5.1 LEGAL & STATUTORY FRAMEWORK.....	26
5.2 INSTITUTIONAL STRUCTURES AND FUNCTIONS.....	26
5.3 KEY INSTITUTIONS/STAKEHOLDERS AND THEIR ROLES	27
5.3.1 <i>Oversight Body – Sindh Child Protection Authority</i>	29
5.3.2 <i>Child Protection Technical Working Group</i>	30
5.3.3 <i>Child Protection Parent Body – Social Welfare Department (SWD)</i>	31
5.3.4 <i>Executing Body – Child Protection Units (CPUs)</i>	31
5.3.5 <i>Collaborative Departments</i>	32
5.4 PROGRAMMES AND SERVICES.....	37
5.4.1 <i>Prevention</i>	37
5.4.2 <i>Response</i>	43
5.5 SOCIAL SERVICE WORKFORCE FOR CHILD PROTECTION	46
5.5.1 <i>Mainstreaming Child Protection into Curricula</i>	47
5.5.2 <i>On-the-job Mentoring</i>	48
5.5.3 <i>Training</i>	48
5.5.4 <i>Educating</i>	48
5.5.5 <i>Quality Benchmarking</i>	48
5.6 CHILD PROTECTION AND GENDER-RESPONSIVE BUDGETING	49
5.7 CHILD PROTECTION INFORMATION MANAGEMENT SYSTEM (CPIMS)	49
6 WAY FORWARD	51
SUPPLEMENTARY PROVISION 1:	52
SUPPLEMENTARY PROVISION 2:	59
ANNEXURE A: SELECTIVE LEGISLATIONS FOR CHILDREN IN SINDH	65

GLOSSARY

Alternative Care: Alternative care includes extended family care, placement with a guardian, or in an institution established or regulated by the State, or any other arrangement in the best interest of a child and authorised by the Court in accordance with the law and considering all views, including those of the child in the need of protection. Alternative care is provided where the child's own family is unable, even with appropriate support, to provide adequate care for the child, or abandons or relinquishes the child. It may take the form of informal care or formal care. With respect to the environment where it is provided, alternative care may be kinship care, foster care, other forms of family-based or family-like care placements, residential care, or supervised independent living arrangements¹.

Assessment: The systematic process of gathering information to arrive at an understanding of whether a child needs protection as per the provisions of the law, and accordingly determine the protection needs of that child and his/her family, including strengths and challenges in context of their environment, consisting of initial and comprehensive assessments.

Authorized User: means a staff member of a User Organization who has been given access privileges for CPIMS+/Primero in Sindh in accordance with the CPIMS+/Primero in Pakistan Authorized User Procedures.

Best Interests of a Child: An overarching concept that represents a set of criteria under which all of the child's rights for holistic development are acknowledged and promoted in decisions made regarding a child.²

Caregiver(s): Person(s) providing care to a child, including parents, guardians, and other adults entrusted with the care of the child.

Case: Each individual child identified as vulnerable and potentially in need of child protection services.

Case closure: The process of concluding the desk officer (for case management) involvement in the case, undergoing a process of proper termination with the client and completing necessary data and reports for information management system.

Case Management and Referral Mechanism: A method of social service practice focusing on an individual in need of services, with a desk officer (for case management) connecting them to multiple services, as compared to focusing on an entire school, community, or other groups. This method utilizes individualized assessment and custom-tailored referrals, thus 'leveraging' resources for the client. In child protection case management, the child in need of protection is the focus, while his or her family are often also included in the services provided.

¹ Source: United Nations (2009). Guidelines for the Alternative Care of Children, paragraphs 5 and 28 (b),(c)

² United Nations (2013). Committee on the Rights of the Child. General Comments 14. 29 May 2013, pp. 3-5. Retrieved from <https://bettercarenetwork.org/sites/default/files/attachments/UNCRCUNCRC%20General%20Comment%20on%20the%20Right%20of%20the%20Child%20to%20His%20or%20Her%20Best%20Interests.pdf>

Case Management Process: Collaborative process of registration, assessment, planning, facilitation, and referrals to services, monitoring and follow-up to respond to the child protection needs of a child in and his or her family, to reduce child protection risks.

Case Registration (or registration): The process of officially documenting a case of a child in need of protection.

Child: A person below the age of 18 years living in Pakistan.

Child Abuse: The intentional perpetration of one, or a combination of more than one, of the following: physical or psychological violence, exploitation, injury, neglect or negligent treatment, or maltreatment, including sexual abuse. Child abuse can take four forms:

i. Physical Abuse:

Any act of commission that may result in harm, physical injury to the child; an exploitation of the rights of the parents/care givers/teachers to control, discipline and punish their children. It includes variety of violent actions such as beating, burning, hitting, shaking, biting, kicking, scolding, strangling, poisoning and suffocating a child.

ii. Emotional/Psychological Abuse: A form of child abuse including the failure to provide a nurturing, loving, and supportive environment appropriate for the development of the child, and includes humiliation, withholding of love, blaming, frightening, threatening, terrorising, discrimination, ridiculing, and other non-physical forms of rejection or hostile treatment. Emotional abuse can damage a child's physical or mental health as well as impair the child's physical, mental, spiritual, moral, or social development.³

iii. Sexual Abuse: includes any sexual act forced on the victim. This form of abuse is also often known as sexual assault or rape. Sexual abuse can include anything from unwanted touching to forced intercourse or forced sexual contact with another person. This type of abuse is often perpetrated against women although men can be victims of sexual abuse too.

iv. Neglect: is the ongoing failure to meet a child's basic need. A child may be left hungry, or dirty without adequate clothing, shelter, supervision, education, medical or health care. A Child may also be put in danger or not protected from physical or emotional harm. A child who is neglected may often suffer from other abuse as well.

Child at Risk: A child in need of protection who is at an unacceptable risk of suffering harm as a result of physical, emotional or sexual abuse and/or exploitation. It includes a child with health impairment, an orphan, victim of an armed conflict or a natural disaster, an unaccompanied asylum seeker/refugee, living in extreme poverty, working or living on the street or in hazardous condition, in conflict with the law and the child of a migrant worker among others.

Child in Need of Protection: A child in need of protection shall include any child who has been subjected to, is subject to, or is under serious threat of being subjected to: physical violence or injury, mental violence, neglect or negligent treatment, maltreatment, exploitation, and sexual

³ UNICEF Malaysia (2014). Fact Sheet. Child abuse: Emotional abuse. Retrieved from: <http://stopchildabuse.unicef.my/files/factSheets/StopChildAbuse-Factsheet-Emotional-Abuse.pdf>

abuse or sexual exploitation while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

Child in Conflict with the Law (Juvenile Delinquent): A child who is above minimum age of criminal responsibility (which is 14) and does an act of commission or omission in contravention of any law being in force in Pakistan.

Child Labour: Means work by a child which is exploitative, hazardous or otherwise inappropriate for a person of that age, and that places the child's well-being, education, physical or mental health, or spiritual, moral, emotional or social development at risk.

Child Protection: A set of services and mechanisms to prevent and respond to any form of abuse, including violence, exploitation, or neglect of a child.

Child Protection Focal Point: A qualified person from respective collaborative department working in close coordination with Social Welfare Department to receive, respond and report back all referred cases.

Child Protection Officer: A qualified person appointed to the Social Welfare Department holding full and comprehensive responsibility for case management and referral of all reported cases of child abuse in the district.

Child Protection System: can be defined as 'certain formal and informal structures, functions and capacities that have been assembled to prevent and respond to violence, abuse, neglect and exploitation of children. CP system is generally agreed to be comprised of the components including Human Resource, finance, laws and policies, governance, monitoring and data collection as well as protection and response services and care management. It also include different actors like children, families, communities, those working with sub-national or national level and those working with internationally. Most important are relationship and interactions between and among these components and these actors within the system

Child Protection Unit (CPU): A governmental unit established at district level to register reports of alleged child abuse, carry out assessment, prepare a case plan and make referrals, as appropriate, monitor cases and follow-up till case closure. Each CPU is headed by a qualified Child Protection Officer, holding full and comprehensive responsibility for case management and referral of all reported cases of child abuse in the district, training of CPOs, collection and maintenance of case management data, and monitoring the application of child protection regulations at the district level.

Client: A person who receives a service from a trained professional. In the case management system, it is the child in need of protection and the child's family participating in the case management intervention.

Complex Case: A complex case involves a case with multiple and serious issues of child protection that will require the extensive involvement of various stakeholders within the case management system and will require close communication and coordination among them to move the case forward. An example may include a child who is severely malnourished, not enrolled in a school and is with caregiver suffering from mental health while lacking resources due to extreme poverty.

Confidentiality: The duty to respect the privacy of information shared by and about a child and his/her family in the course of a case and for the child's lifetime.

Consent: encompasses any freely given specific and informed agreement of a child to the processing of their personal data in light of the information provided to a child protection official.

Court: The Family Court established under the West Pakistan Family Court Act, 1964, having jurisdiction over child protection cases.

Comprehensive Assessment: A full analysis undertaken by a Child Protection Officer in support of a determination as to whether a child requires protection in accordance with the provisions of the law.

Corporal Punishment or Physical Punishment means any punishment in which physical force or action is used which is intended to cause some degree of pain or harm. It involves, but is not limited to, hitting ('smacking', 'slapping', 'spanking') children in any environment or context, including the home setting, with the hand or instruments such as a whip, stick, belt, shoe or wooden spoon. It can also involve, for example, kicking, shaking or throwing children, scratching, pinching, biting, pulling hair or boxing ears, caning, forcing children to stay in uncomfortable positions, burning, scalding, or forced ingestion.

Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal or confidential data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal or confidential data.

Exploitation: Refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Gender: Gender refers to the social relationships between women, men, girls and boys that vary from one society to another and at different points in history.

Gender Equality: Gender equality is a transformational development goal. It is understood to mean that women (girls) and men (boys) enjoy the same status on political, social, economic and cultural levels. It exists when women (girls) and men (boys) have equal rights, opportunities and status.

Gender Equity: Gender equity is the process of being fair to both women (girls) and men (boys) in distribution of resources and benefits. This involves recognition of inequality and requires measures to work towards equality of women (girls) and men (boys). Gender equity is the process that leads to gender equality.

Government means the Government of Sindh.

Guardian: Under the Guardian and Wards Act 1890, ‘guardian’ means a person having the care of the person of a minor or his property, or both his person and property until the minor reaches the age of majority, or when the Court terminates the appointment.

Initial Assessment: A preliminary analysis of whether a child needs protection, in accordance with the provisions of the law.

Life Skills: Life skills are transferable skills that enable individuals to deal with everyday life, and to progress and succeed in school, work and societal life. They are comprised of skills, attitudes, values, behaviours and domain-based knowledge.

Maltreatment: Cruel or harmful treatment or abuse of children by a caregiver. The World Health Organization (WHO) defines it as: “All forms of child abuse including physical abuse, emotional ill-treatment, sexual abuse, neglect, negligent treatment and exploitation of children, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power”.

Mental violence: All forms of persistent harmful interactions with the child that leads to psychological and emotional harm to the child, including through harsh words, isolating girls and boys, torture, and harassment via information and communication technologies.

Orphan: A child under the age of 18 who has lost his/her parents or one of the parents and has no adequate source of income or is unclaimed or has parents who are destitute or who has been deserted by his/her parents.

Physical violence: This includes actions such as hitting, kicking, shaking, beating, biting, burning, strangulating, poisoning, and suffocating; and all other forms of torture, cruel, inhuman or degrading treatment or punishment. The UN Committee on the Rights of the Child would add: all forms of corporal punishment and physical bullying and hazing by adults and by other children.⁴

Primary Collaborative Departments: Mainly those departments to whom a possible case of a child in need of protection can be referred for service delivery. They can also have or initiate clear and direct preventive child protection actions or interventions.

Primero: An information processing software implemented in Sindh to report and process child protection cases. Primero is designed to be configurable, secure and easy to use and includes a range of enhanced interagency child protection information management systems (CPIMS).

Psychosocial Support: Efforts to help individuals and communities to heal the psychological wounds and rebuild social structures after an emergency or a critical event. It can help change people into active survivors rather than passive victims.⁵ It often refers to those programme components which assist girls and boys, families and communities to cope with crises, and to reinforce or regain healthy psycho-social development and resilience in the face of challenging

⁴ Committee on the Rights of the Child, General Comment No. 13 (2011). The Right of the Child to Freedom from all forms of Violence, paragraph 20.

⁵ UNICEF (n.d.). Definition of psychosocial supports. Retrieved from https://www.unicef.org/tokyo/jp/Definition_of_psychosocial_supports.pdf

circumstances. Material and social needs, along with safety and security, are key factors in ensuring psychosocial wellbeing and should be recognised as part of effective PSS.⁶

Referral: The process of formally connecting a child in need of protection or his/her family to a specific service provider to address an identified service need.

Referral Pathway: The sequence and direction of referrals formally made to and from one entity to another and the points at which services are provided; typical terminology used when multiple sectors or agencies are involved in a case.

Secondary Collaborative Departments: Those departments who are neither part of the case management process per se, nor have any *direct* preventive child protection actions, but may have a significant role in the overall planning, financial allocation, and monitoring for/of child protection in the province.

Sex: The term “sex” is defined to mean the biological differences between women and men.

Separated Child: Means a child who has been separated from both parents or from previous legal or customary caregiver/s, but not necessarily from other adult family members, including a child accompanied by an adult family member.

Standard Operating Procedures (SOPs): A set of step-by-step instructions to help workers conduct complex but routine operations. SOPs aim to achieve efficiency, quality output and uniformity of performance across all practitioners engaged in the same work.

Supervision: The process of providing oversight and support to the individuals engaged in service delivery to ensure quality care, by someone who has technical expertise to guide the person being supervised.

Trauma: The psychological or emotional response to an event or experience that is deeply disturbing and may have long term negative impact on the mental health of the victim. The nature and degree of response to trauma varies from person to person, but for victims of child abuse, the result can be developmentally debilitating, if not treated.

Unaccompanied Child: Means a child who has been separated from both parents or any other adult family members and is not being cared for by an adult who, by law or custom, is responsible for doing so.

Vulnerable Child: A child living and working in circumstances comprising a risk of abuse, neglect, exploitation, or violence with a limited capacity to cope, and whose prospects for continued growth and development are seriously threatened.

⁶ UNICEF (n.d.). UNICEF Programming for Psychosocial support. What do we mean by psychosocial support (PSS)? Retrieved from <https://bettercarenetwork.org/sites/default/files/attachments/Programming%20for%20Psychosocial%20Support%20FAQs.pdf>

1 Preamble

The Government of Sindh (GoS) affirms that children are persons with rights. Under Article 35 of the Constitution of the Islamic Republic of Pakistan 1973,⁷ children, mothers, and families are extended special protection. Through the Sindh Child Protection Policy, the GoS expresses its determination and commitment to prevent any form of abuse, violence, neglect and exploitation against children and ensure a safe and protected environment for every child to grow up in and develop to realize his/her full potential. The policy requires all government departments, civil society, private sector, individuals and other organizations to share responsibility to protect, promote and secure the rights of all children at all the times, at all levels and in whatever capacity anyone operates. At the same time, the government emphasizes ‘ZERO Tolerance’ towards those committing child abuse, whether directly or indirectly associated with any of the government department/s. By adopting this Child Protection Policy, the GoS intends to streamline all interventions and make all areas of operations child-sensitive and safe for all children.

The Sindh Child Protection Policy will serve as a guiding document for the Government of Sindh and relevant stakeholders to adopt practices and systems that will ensure protection of children from abuse, violence, neglect and exploitation. It will further have an impact on the Government’s child protection structural framework by clarifying Government roles and responsibilities to efficiently prevent and respond to the violations of children’s right to protection. Policy contributes towards effective implementation of enacted legislation/s on child protection and reviewing it, where required.

The Sindh Child Protection Authority (SCPA) Act, 2011 (Amended in 2021) paved the way for legislation concerning protection of children in the province. The government, through this Act, committed to provide care, protection, maintenance, welfare, training, education, rehabilitation, and reintegration of children at risk. After the enactment of this law, the provincial government established a ‘Sindh Child Protection Authority’ as a governing body to oversee child rights violations in the province, under the ministry of Social Welfare. Moreover, Child Protection Units (CPUs), district committees and rehabilitation homes for children with drug/substance abuse issues have also been established across the province.

The Sindh Child Protection Policy intends to assist all coordinating ministries and government departments in playing their part for effective implementation of laws pertaining to child protection in Sindh. The High Court of Sindh at many instances has also quoted and emphasized on the realization of UNCRC when passing verdicts. The Child Protection Policy provides a framework, direction and guidelines to ensure protection of children from all forms of abuse, violence, neglect and exploitation as enshrined in Article 19⁸ of the United Nations Convention on the Rights of the Child (UNCRC), by strengthening existing systems and mechanisms and clearly defining the roles and responsibilities of the duty-bearers to engage in collective, integrated and harmonized actions for the realization of a child’s right to protection. This is informed by the Constitutional and international commitments, existing provincial legislative framework as well as gaps to guide

⁷ National Assembly of Pakistan (2012). The Constitution of the Islamic Republic of Pakistan, 1973 (Rev. 2012).

⁸ United Nations Committee on the Rights of the Child (2011). General comment no. 13. The right of the child to freedom from all forms of violence. Retrieved from: https://www.unicef-irc.org/portfolios/general_comments/UNCRCUNCRC.C.GC.13_en.doc.html

requisite legal and structural reforms for effective implementation of child protection services at provincial and sub-provincial levels.

Constitutional and International Commitments to Child Protection

The Holy Prophet (Peace Be Upon Him) said, “Treat the children under seven with tenderness and compassion, children from seven to fourteen years of age with care and concern and children older than fourteen years of age with trust and cooperation.” These teachings discourage the use of violence against children even for disciplinary purposes; instead, they encourage the importance of children’s participation and engagement in decision-making processes in accordance with their age and maturity levels.

The Constitution of the Islamic Republic of Pakistan addresses child protection. Within its chapter on Fundamental Rights, Article 25 states that:

1. “All citizens are equal before law and are entitled to equal protection of law.
2. There shall be no discrimination on the basis of sex alone.
3. Nothing in this Article shall prevent the State from making any special provision for the protection of women and children.”

Within the Constitution’s chapter on Principles of Policy, Article 35 states that “the State shall protect the marriage, the family, the mother and the child.” Moreover, the Article 11 of the Constitution guarantees that no child below the age of fourteen years shall be engaged in any factory or mine or any other hazardous employment.

The Government of Pakistan has made international commitments to child protection by signing and ratifying a number of conventions and treaties. In November 1990, Pakistan ratified the United Nations Convention on the Rights of the Child (UNCRC), cementing the country’s commitment to all its children: **That the State would do everything in its power to promote and protect its children’s rights.** According to the CRC, all children have the right to:

1. Survival
2. Development
3. Protection
4. Participation

In addition to the CRC, Pakistan has ratified the ILO Convention 182 on Worst Forms of Child Labour in 2001, and the ILO Convention 138 on Minimum Age for Employment in 2006. It has also ratified the Optional Protocol to the CRC on the Involvement of Children in Armed Conflict in November 2016, and the Optional Protocol to the CRC on the Sale of Children, Child Prostitution and Child Pornography in July 2011.

The UN Convention on the Rights of the Child is in essence a comprehensive "bill of rights" for all children’s rights relating to their survival, protection, development and participation. The underlying principles of the Convention are summarized as follows:

- i. **Non-discrimination (Article 2):** All rights apply to all children without exception. The State is obliged to protect children from any form of discrimination and to take positive action to promote their rights.
- ii. **Best Interests of the Child (Article 3):** All actions concerning the child shall take account of his or her best interests. The State shall provide the child with adequate care when parents, or others charged with that responsibility fail to do so.
- iii. **Survival and Development (Article 6):** Every child has the inherent right to life, and the State has an obligation to ensure the child's survival and development.
- iv. **Right to Identity (Article 7):** The child's name, nationality and family relations determine the child's identity. Establishing a child's identity is in essence an official acknowledgement of the child's existence. It makes the child visible to society and turns him or her into a legal being with rights and duties. It also secures the exercise of other child rights such as the right to education. It also reduces the danger of abduction, sale of or trafficking in children, child marriage and child labour, among other child protection concerns.
- v. **Parental Care (Articles 9 & 18):** A child or young person shouldn't be separated from their parents unless staying with their parents could be harmful to them or it's impossible for them to stay with their parents. A child or young person's parents have the main responsibility for bringing them up.
- vi. **Child's Participation and Privacy (Articles 12 & 16):** The child has the right to express his or her opinion freely and to have that opinion taken into account in any matter or procedure affecting the child. Participation rights allow children to have a say in the decisions affecting their lives. They give children the possibility to express their views, to discuss issues they consider important, to assemble and to receive information that is relevant for them. Similarly, children and young people have the right to privacy too, just like adults do.
- vii. **Protection (Articles 19, 20, 25, 32, 33, 34, 35 and 36, 39):** The rights of children to be protected against violence, abuse, neglect and exploitation, including sexual abuse and exploitation, economic exploitation and worst forms of labour, child marriage, illegal use of drugs and drugs trafficking, kidnapping, selling and child trafficking and protection during armed conflict are listed in the Convention.

Children, because of their dependence and maturity levels, are vulnerable to abuse in its various forms. Parents or guardians have primary responsibility for the care and protection of their children. When parents or guardians do not or cannot fulfil this responsibility, the state has a legal obligation to intervene and ensure that children are adequately protected.

The UNCRC recognizes the critical role of the family (defined as nuclear or extended) in the life of a child. It states that the family, as the fundamental unit of society that provides the natural environment for the well-being, growth and identity of all its members and particularly children, should be afforded the necessary protection and assistance so that it can fully assume its responsibilities.

The wider community also has a responsibility for the welfare and protection of children. All personnel involved in organizations and institutions working with children and families (schools, religious schools/institutions, medical institutions, social services, police, prisons, and so on) should be alert to the possibility of child abuse in their respective settings. The wider community

of relatives, friends and neighbours are well placed to help and must also be aware of the steps to take if such a concern arises. Personnel working with children and the wider public should know that the utmost priority is to prevent such incidents from occurring. In the worst-case scenario, however, where abuse has already taken place, early action is often the best way to protect children and to enable a family to stay together.

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2 Violence and Exploitation in the Life Cycle of Children

While exploring the notion of violence against children, it is rather challenging to curtail it within a well-defined sphere due to its very pervasive nature. According to the World Health Organization (WHO), “global statistics reveal that up to 1 billion children have suffered physical, sexual and psychological violence in the past year, 1 in 4 children suffer physical violence; 1 in 5 girls and 1 in 13 boys experience sexual violence⁹.” Children in Sindh are also vulnerable to abuse in various settings.

Violence against and abuse of children takes different forms at different ages, as shown in Figure 1 below:

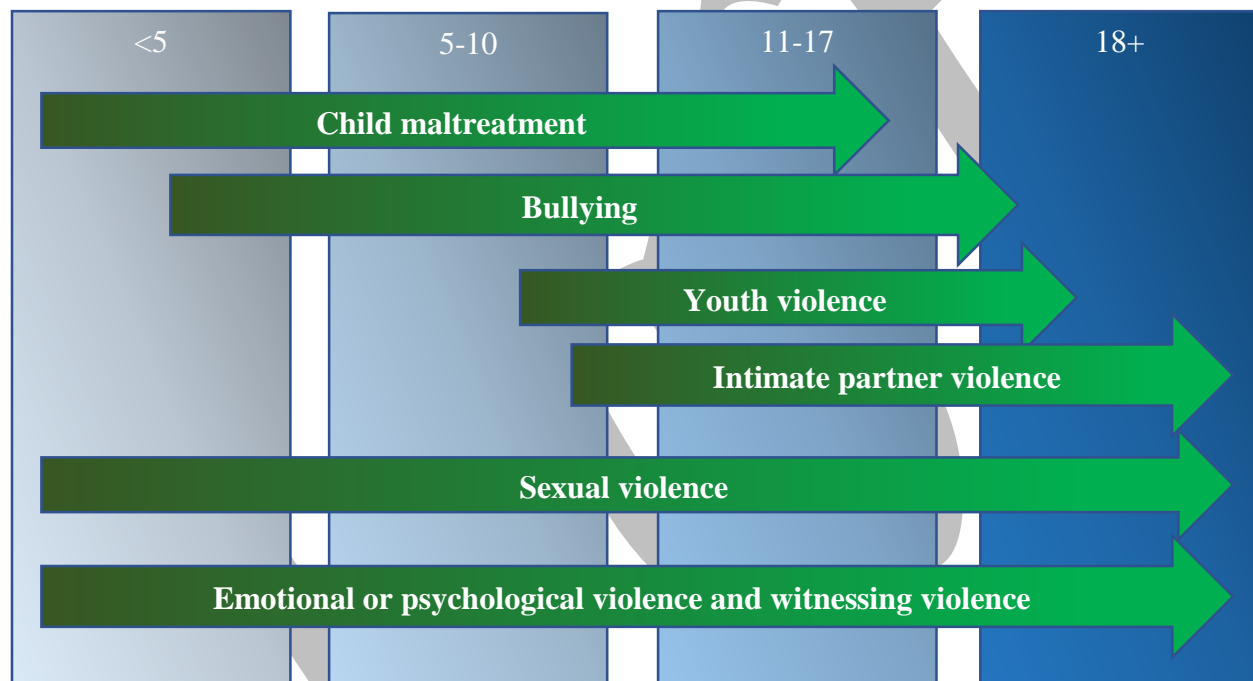


Table 1 Violence against and abuse of children at different ages

The consequences of child abuse have ripple effects with significant social and economic costs at the individual and societal levels. At the individual level, evidence shows that an abused child’s well-being will be negatively impacted in both the short and long-term, whereby his/her ability to learn and socialize is impaired, leading to adverse consequences later in life. Research also confirms negative consequences of abuse on children’s educational outcomes and heightened risks for educational underachievement. At the societal level, consequences include increased social spending and lost economic productivity. From the cost-benefit perspective alone, then, it is critical to invest in child protection systems to prevent and respond to child abuse. The systematic collection of child abuse data should be inherent to these systems, ultimately bringing this unsavoury topic to light and revealing the hidden attitudes and social norms that may perpetuate violence against children and factors that may place certain children at higher risk.

⁹ WHO (2016). INSPIRE: Seven Strategies for Ending Violence Against Children.

Violence and abuse may pervade the life cycle of a child through to adulthood, as depicted in Figure 2 which shows that “in *early childhood*, infants and young children are particularly at risk of violence by primary caregivers and other family members because of their dependence and limited social interactions outside the home. While girls and boys move towards *middle childhood*, they are faced with increased exposure to interpersonal violence as they become more independent and begin interacting with people other than their primary caregivers. This increases the likelihood of abuse by both caregivers and people outside the home. In *late childhood or adolescence*, gender, sexuality and sexual identity begin to assume greater importance, thus children may be at a greater risk of sexual violence and forced or early marriages. Consequently, the types of violence that children are exposed to change as they age, as do the possible effects. Early and prolonged exposure to violence has the potential for the most advanced and long-lasting impact since it affects the subsequent chain of development. Younger children appear to exhibit higher levels of psychological and emotional distress as a result of violence than older children¹⁰. If children grow up in a protective environment, the stages in Figure 2 represent opportunities for building capacities, life-skills and resilience; otherwise, the same stages are associated with various forms of violence.

¹⁰ United Nations Children’s Fund (UNICEF), *Hidden in Plain Sight: A statistical analysis of violence against children*, UNICEF, New York, 2014.

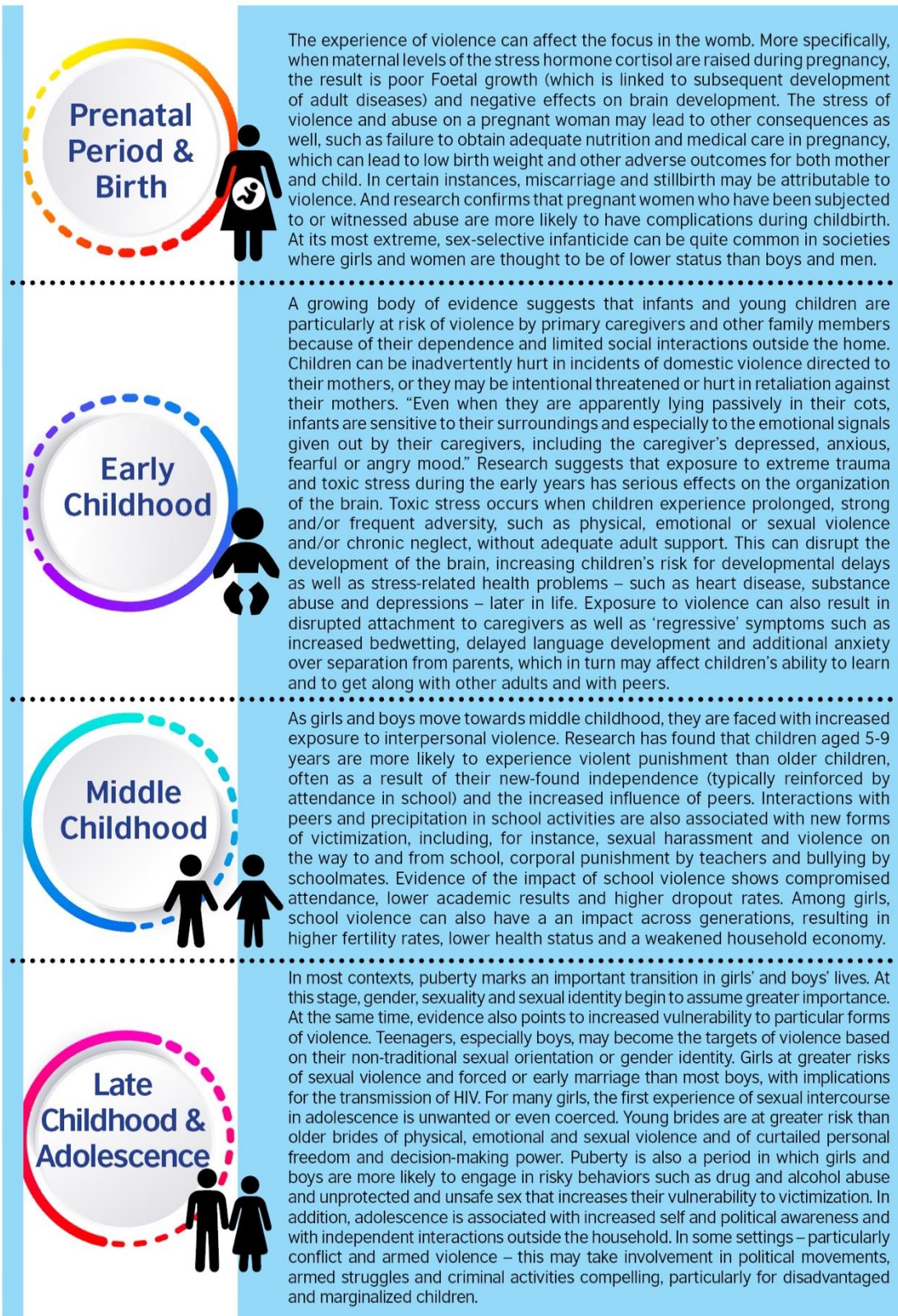


Figure 1 Sources and consequences of violence and abuse in a child's life cycle

3 Vision & Scope

3.1 Scope

The Sindh Child Protection Policy provides an overarching direction towards the fulfilment of a child's right to protection and safeguarding. It does so by primarily emphasizing a proactive approach geared towards prevention of abuse, violence, exploitation and/or neglect, and secondly by establishing robust response systems when cases of abuse, violence, exploitation and/or neglect are reported. The system includes the use of technology by field staff and officers in order to provide an efficient, standardized approach to facilitating the child's security. The policy recognizes the potential for responsible government departments/agencies – including the oversight body, technical working group, parent department, executing body, collaborating departments and support partners – to review and align their procedures, plans, and budgets in compliance with the present Policy.

3.2 Vision

Every child in Sindh to be protected from all forms of abuse, violence, exploitation, neglect, and harmful practices¹¹. Every child to have access to a comprehensive system that ensures prevention of violation of his/her right to protection, and provides coordinated response services to ensure care, support, and justice.

3.3 Mission Statement

The Government of Sindh is committed to adopting and implementing all legislative, administrative, and regulatory measures and reforms to protect every child in Sindh from all forms of abuse, violence, exploitation, neglect and harmful practices through a system-based approach. A comprehensive child protection system is established to

- (1) ensure a protective environment is in place to prevent violation of children's right to protection, and ensure their wellbeing and development; and
- (2) Should their right to protection be violated or be at risk of violation, a systematic and comprehensive response is provided on an individual basis, taking into consideration the best interests of the individual child, where a child requiring protection has access to appropriate available services, including provision of support to the family to provide adequate care for the child.

This protection provision is extended to any child in need of protection, in instances where the child has been subjected to, is subject to, or is under serious threat of being subjected to harm. All children are valued equally, and shall not be discriminated against, regardless of their age, gender, ethnicity, economic or social status, religion, or any other characteristic.

¹¹ Harmful practices in the context of Sindh may include but not limited to early and forced marriages, honour killings, restriction of movement, denial of access to essential services in the name of culture or traditions and so on.

3.4 Aim, Goal & Objectives

The overall aim of this policy is to strengthen Sindh’s child protection system.

The goal of this policy is to provide a strategic framework in order to guide the actions of key stakeholders/duty-bearers and set out clear responsibilities and accountabilities. A complementary goal is to establish a foundation, inclusive of children’s voices, for first preventing and in other cases, responding to violations of children’s right to protection and participation with adequate resource allocation and respective data management, quality standards and oversight.

Specific objectives of this policy are as follows:

- a. To provide a strong legal and policy framework for prevention of and response to violations of a child’s right to protection from abuse, violence, exploitation and neglect through the enactment of legislative and policy reforms in Sindh.
- b. To place effective institutional governance structures with clarity of functions and roles to play within a broader child protection system.
- c. To provide a conducive framework within which to initiate programmes for the rights holders, for the prevention of and response to child protection violations and to ensure the meaningful participation of children in matters affecting them, in accordance with their age and maturity.
- d. To strengthen the capacities of key duty-bearers in child protection particularly the child protection cross-sectoral social service workforce.
- e. To ensure that adequate resources are allocated in public expenditures and annual budgeting to sustain the child protection system and children’s participation, by all relevant government departments in their annual plans and programmes; and
- f. To establish and strengthen central Child Protection Data Management, Quality Standards and their oversight through strong Accountability, Monitoring and Evaluation Systems.

3.5 Categories of “Stakeholders” – circles of support and harm for girls and boys

This policy defines the Government of Sindh’s commitment to protect every child in Sindh from violence, abuse, neglect, exploitation and harmful practices, which is only possible through a joint, synchronized, and collaborative effort from all key stakeholders. In recognizing the integrated approach required, this policy applies to all key duty-bearers in accordance with their respective roles in fulfilling children’s right to be protected from violence, abuse, exploitation and neglect. Applicability of and compliance with this policy is mandatory for anyone coming in contact with the child, for which clear accountability measures will need to be put in place. Stakeholders in this regard include:

- a. **Immediate Family/Extended Family/Caregiver(s):** These are person(s) providing care to a child, including parents, guardians, and other adults entrusted with the care of the child. Extended family includes maternal and paternal uncles, aunts, and cousins (who have attained the age of maturity).
- b. **Community:** This refers to neighbours, teachers, health workers, *mohalla* committee members, and local community leaders, all of whom have a responsibility to protect children in their respective communities.
- c. **Public, Private and Civil Society Institutions and Organizations**
 - i. Child Protection System – Primary Collaborative Departments, Institutions & Authorities: These include SWD, Labour, Local Government, Health, Police,

Education, Auqaf, Prosecution, FIA, NADRA, AIG, Mayor and female members of local bodies. These departments have a role to provide child protection services within the system, every time a case is referred to them. Each of these departments will have to reflect upon its existing programs and systems against this policy's provisions and make revisions accordingly.

- ii. Child Protection System – Secondary Collaborative Departments, Institutions & Authorities: These include Planning and Development, Finance, Law, Information and Ombudsman. These are departments that do not provide direct child protection services but are essential for the system's infrastructure. They provide policy advice, funding, strategy development, workforce strengthening activities, social norms change through mass media, and other necessary functions. They will have to observe and respect the policy provisions in accordance with their roles and responsibilities.
- iii. Private Institutions: These include schools, hospitals, corporates, informal businesses and so on. Private institutions are required to implement policy provisions for the protection of the children within the scope of their business and ways of conducting the business.
- iv. Civil Society Organizations: These include I/NGOs, NGOs' networks, associations, trade unions, bar councils, and so on, and have a key role to play for the protection of children. They will have to observe and respect the policy provisions for the protection of children while carrying out their work.
- v. Media: This includes print, electronic and social media particularly journalists' associations, press clubs, and media networks, who have a critical role as watchdogs to monitor child protection situation and raise the concerns to masses for publicly holding accountable the key duty-bearers.

4 Guiding Principles

The following seven principles are intended to guide decisions concerning child protection.

(1) Prioritize the best interest of the child (BIC)

Article 3 of the UNCRC states that “in all actions concerning children...whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration”. While most child protection situations do not present a conflict with regards to the best interest of the child (BIC) concept, instances may arise where the policymakers, authorities or workers feel pressure due to conflicting arguments from relevant stakeholders such as other policymakers, authorities, parents/guardians, teachers, community and religious leaders, or even other service agencies. For example, in a situation where abuse may be occurring in a state-run facility, the child protection officer may feel pressurized to keep the issue quiet so that the state agency’s problems are not exposed. The inter-agency type problems, as well as cases involving high profile community or political leaders, need to be handled through the multi-sectoral mechanism so that there is wide support for upholding the best interest of the child, and decisions are made and implemented as consistent with the BIC principle.

(2) Do no harm

This principle seeks to ensure that those who have access to vulnerable children and parents/guardians or have the authority to develop policy and programs for children’s protection, are careful not to bring harm, intentionally or unintentionally, to the children through their actions. It is not uncommon for policy practitioners to make mistakes in their eagerness to help children. For example, they may cause harm by

- a. Placing vulnerable children in institutions (considering it as an appropriate measure for them) where they are then subjected to physical and sexual abuse,
- b. Initiating programmes to teach children about their rights, without first sensitising parents/communities about the topic, thereby inadvertently exposing children to risks if they belong to conservative families/communities that consider such topics taboo or are not amenable to being questioned by their children.
- c. Conducting research into children’s lives and raising their expectations for change but then offering no feedback or action, resulting in disillusionment as to the benefits of both research and participation.

(3) Ensure confidentiality

Key and relevant stakeholders (departments, agencies, organizations etc.) must prioritise data protection and be vigilant in collecting, storing, transporting, and maintaining confidential information regarding the child’s identity or information related to that child, even when they believe sharing information will be helpful to the child. Careless sharing of information, without deciphering when the information must be shared, needs to be shared, and can be shared, can put the child and his/her family in jeopardy, especially with regards to being stigmatized or targeted for retaliation. Exposing the identity of a

child/family to social or mass media can cause immense harm. Information should be shared only with people who must know it in order to help or protect the child, with written consent of the child's parent(s)/guardian(s). Private information can also be shared in a supervisory setting, as well as in a case review setting with confidentiality MOUs signed by all agencies involved, and when making a referral to a service provider with whom the referring agency has signed a Memorandum of Understanding (MoU) regarding confidentiality.

(4) Child Participation and Empowerment of the Child and Child's Family.

Children should be free to have opinions in all matters affecting them, and those views should be given due weight in accordance with the age and maturity of the child. The underlying idea is that children have the right to be heard and to have their views taken seriously, including in policy formulation, designing programmes likely to impact them, and in any judicial or administrative proceedings affecting them. In practice, this shall mean that any and every individual, group of individuals and/or institution whether government, semi-government or non-governmental, if and when any plan is developed or implementation of any policy, law, program, intervention, and procedure is undertaken, meaningful participation of children has to be ensured and not just assumed.

Moreover, it is essential to recognize that children's most important relationships are generally within the family, so it is important to partner with and empower the child's family alongside the child. Having these strong bonds is one of the most crucial tools in the child's development and adult life. Even when a family is experiencing difficulties, most children, girls and boys, are best served by remaining within the family unit unless serious child protection issues exist within the family setting. It is also important to recognize that every child and family have their own strengths and needs. Family strengthening may be in the form of expanding economic, social, or emotional capacity to provide for the child's protection needs, often requiring referrals to those services.

Even when a child is not living with his or her family, the first line of inquiry should be about the child's circles of support. Once the child's safety and health are secured, restoring family or other nurturing relationships and determining how those relationships can be strengthened to serve the child's best interests, should in principle be a priority.

(5) Demonstrate cultural humility and respect for diversity

All policies, programmes and/or initiatives need to be taken with due consideration and on account of cultural sensitivity and appropriate respect for diversity. Marginalised and vulnerable groups, for example, women and those that are in ethnic or cultural/religious minority groups may feel a greater sense of being singled out, or have difficulty feeling support from various policies, laws and/or authorities. Thus, those working for or with such communities and families must show equal respect to all segments regardless of gender, social class, ethnicity, religious affiliation, or other types of diversity.

For most children and families referred to the child protection case management and referral system, it is a very intimidating experience, due in part to the fact that CPOs and those who work the closest with them, are officials. However, it is also due to the fact that someone is pointing out negative behaviours and that changes should be made. Thus, the officials working with such families must also show equal respect to all clients regardless of gender, social class, ethnicity, religious affiliation, or other types of diversity.

(6) Non-discrimination

All children should enjoy their rights. No child should suffer discrimination. This applies to every child, "irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status¹²".

(7) Family-based Care

The family has the right to be afforded the necessary protection and assistance so that it can fully assume its responsibilities within the community as the fundamental unit of society. Similarly, the child has the right to grow up in a family environment, in an atmosphere of happiness, love and understanding, for the full and harmonious development of his or her personality¹³. Thus, family strengthening programs need to be supported. Representing the importance of norms and local culture regarding extended family care for the child's well-being and best interest, vulnerable/neglected children should be assisted within the broader context of their families, unless there is a reason why ongoing care within the family would not be in the child's best interests, as determined on the basis of thorough and objective assessment and, if necessary legal, processes.

Children without families should have resources to family-like care provided by the government. In any circumstance, institutional care for the children is discouraged and must only be considered as the last resort where it may be absolutely necessary for the child's survival and protection.

¹² Source: Article 2, UNCRC (1989).

¹³ Source: Preamble to the UNCRC (1989).

5 Governance Framework for Child Protection in Sindh

As evidenced by various legislations (see **Error! Reference source not found.** and Table 2), an ‘issue-response’ framework has traditionally been central to Sindh’s child protection agenda, whereby the focus has been on specific issues affecting particular groups of vulnerable children, such as violence against children, child trafficking, child marriage, child labour, justice for children, children affected by armed conflict, child separation and alternative care, to name a few. Despite its evident benefits, this approach has been deficient of a truly comprehensive and sustainable strategy to first *prevent* and where needed, respond to child protection violations at scale and has instead mostly led to fragmented child protection responses.

In order to move forward with efforts towards creating a strengthened protective environment for children, there is a need to go beyond the ‘issue-response’ focus, to lead instead to the development of child protection systems, described as ‘a set of laws, policies, regulations and services, capacities, monitoring, and oversight needed across all social sectors - especially social welfare, education, health, security and justice - to prevent and respond to protection related risks. The child protection system should aim to develop appropriate laws, policies and services across sectors to protect all children from abuse, violence, exploitation and neglect, and also support social and behavioural communication change that reinforces social conventions, norms and values favouring the *prevention* of violence. The relationship and interactions between and among these various components and actors within the system are crucial.

The child protection system in Sindh includes informal and formal structures and actors at the provincial, district, and local levels. While the Government of Sindh is spearheading the child protection reforms acknowledging the need to establish and strengthen an integrated, coordinated and cross-sectoral child protection system, the Sindh Child Protection Authority (SCPA) holds the primary mandate for protection of children in the province. In line with global and regional best practices, it must be noted that the overall mandate and responsibility of coordinating the child protection system rests either with ministries of women and child welfare/development, social welfare or child protection. With reference to South Asia, this remains true as well¹⁴.

Other primary and secondary collaborating partners comprising of relevant government line departments and civil society organizations have a key role to play for the effective delivery of child protection services. In Sindh, The Sindh Child Protection Authority Act, 2011 (amended 2021) paved the way for legislation for protection of children in the province. The government, through this act, committed to provide care, protection, maintenance, welfare, training, education, rehabilitation, and reintegration of children at risk. After the enactment of this law, the provincial

¹⁴ Department of Women and Child Development – India; Ministry of Women and Children Affairs – Bangladesh; Ministry of Women, Children and Senior Citizens – Nepal; Ministry of Women, Child Affairs and Social Security, Sri Lanka; Family and Child Protection Department, Maldives; Ministry of Social Welfare, Bhutan; Ministry of Social Affairs – Afghanistan.

government established a SCPA as a governing body to oversee child rights violations in the province.

5.1 Legal & Statutory Framework

The following laws relevant to child protection have been enacted in Sindh and are contributing to the implementation of various constitutional provisions and international commitments, including those laid out in UNCRC and the Sustainable Development Goals (SDGs):

Sr. no.	Title of Legislation
1	The Sindh Child Protection Authority Act, 2011 (Amended 2021)
2	The Sindh Prohibition of Employment of Children Act, 2017
3	The Sindh Right of Children to Free & Compulsory Education Act, 2013
4	The Sindh Dar ul Atfal (Supervision & Control) Rules, 1987
5	The Sindh Orphanages (Supervision & Control) Act, 1976 (Amendment Ordinance passed in 1984)

Table 2 Laws pertaining to children in Sindh

Despite having a rich legal framework, a country-wide ‘Child Rights Legislative Review’ undertaken on the 30th anniversary of UNCRC by the Parliamentary Special Committee on the Rights of the Child/SDG Secretariat of the National Assembly in collaboration with the provincial assemblies and authorities, with the technical support of UNICEF, identified gaps. The findings offer an objective analysis of child rights legislation in Pakistan, examining compliance with regard to UNCRC and the Recommendations provided to the Government of Pakistan by the Committee of the Rights of the Child in 2016. The Review highlighted the work that needs to be done to align Pakistani legislations with international commitments and standards keeping in view the local contexts and realities. Among other gaps, a few urgent and basic ones require a consistent definition of ‘child’ as per Article 1 of UNCRC and to reform institutional/governance structures for the effective delivery of child protection.

Moreover, there is a lack of understanding of existing legislation among various institutions and duty-bearers. Thus, it is important that the policy custodian in collaboration with judiciary and academia take measures to disseminate legal information related to child protection to all concerned. One such measure may include but is not limited to developing reader-friendly Information Briefs/Factsheets of the Key Child Protection Laws and making them available not only to the key authorities, institutions and relevant individuals but also to the general public.

5.2 Institutional Structures and Functions

The primary body currently working on child protection in Sindh is the SCPA. Sindh also has various line departments/stakeholders that deliver services relevant to child protection but in most cases do so in isolation and in a fragmented manner, such as education, health, home, labour, social

welfare, judiciary, public prosecution, and FIA. Yet, what remains devoid in the child protection institutional structure landscape is a cross-sectoral integrated mechanism for delivering child protective prevention and response services, for which coordination and collaboration among key actors is crucial. Prevention of violation of a child's right to protection should be the top priority, which not only prevents children from any abuse before its occurrence but also results in saving time and resources. However, if a violation has occurred, the child, a survivor of abuse, should be at the heart of the child protection system, whereby his/her needs should be assessed before giving any child protective service.

While Police plays a critical role in the overall child protection system, it must be emphasized that not every case of child protection requires police intervention, rather in some instances, it can re-victimize the child and cause more harm. Various in-country mapping and assessment¹⁵ exercises on child protection systems with the government have shown that under-utilized resources, particularly of social welfare department (per se Child Protection Authority in the context of Sindh) may be optimally used if linked with child protection, resulting in significant cost-saving for the public exchequer, while also investing in existing structures that have grassroot level presence across the districts, as greater outreach is necessary for effective structural arrangements of child protection. Thus, institutions and their roles need to be clearly defined to have an effective, robust preventive and responsive child protection system for the protection, reintegration and rehabilitation of children in the province. There should be a well-established Technical Working Group (TWG) on Child Protection in the province (though there exist one which may need a review/revisit of their scope of work and TORs), with cross-sectoral representation including relevant government departments, civil society, development sector, and academia to steer the implementation of a coordinated Child Protection System.

5.3 Key Institutions/Stakeholders and their Roles

The Child Protection Policy serves as an umbrella guideline for all key stakeholders for the realization and fulfilment of a child's right to protection in Sindh. Although a number of institutional structures supported by respective administrative or legislative measures are in place in Sindh, there is limited clarity of roles for the delivery of an integrated child protection system. In compliance with this policy, the institutions listed in this section will have to play their roles as per their institutional mandates for delivering child protective services.

It is worth noting that the collective responsibility for children's protection is shared by all departments at provincial and sub-provincial levels, in partnership with parents/families, for-profit and not-for-profit institutions, the media, and other civil society actors.

Last, each of the departments ideally at district level and at least at provincial level should appoint a Child Protection Officer (or designate an existing staff as Child Protection Focal Point) as part of the Child Protection Social Service Work Force, which will undertake a comprehensive assessment, case review, and delivery of protective services. The Child Protection Officer or Focal Point should:

¹⁵ Such as Khan (2012). Child Protection System Mapping and Assessment: Sindh. *Collective for Social Science Research*.

- i. Conduct initial and regular bi-annual assessment of his/her department’s practices against provisions in this policy and UNCRC and recommend actions for corrective measures.
- ii. Ensure the respective departments’ plans are in compliance with child protection policy and adhere to guiding principles of the policy; and
- iii. Review relevant upcoming plans and programs against child protection policy and UNCRC provisions.

Ideally, the Child Protection Officer or Focal Point should be a permanent staff member of the concerned department, otherwise high turnover negatively affects institutional knowledge and capacities to deliver within the child protection system. Similarly, all departments must ensure that their personnel understand and are well versed in the child protection interagency referral mechanism.

The following sections provide a list of key authorities, institutions, departments, civil society and private sector organizations, together with their roles and responsibilities, whereas Figure 2 illustrates their optimal structure.

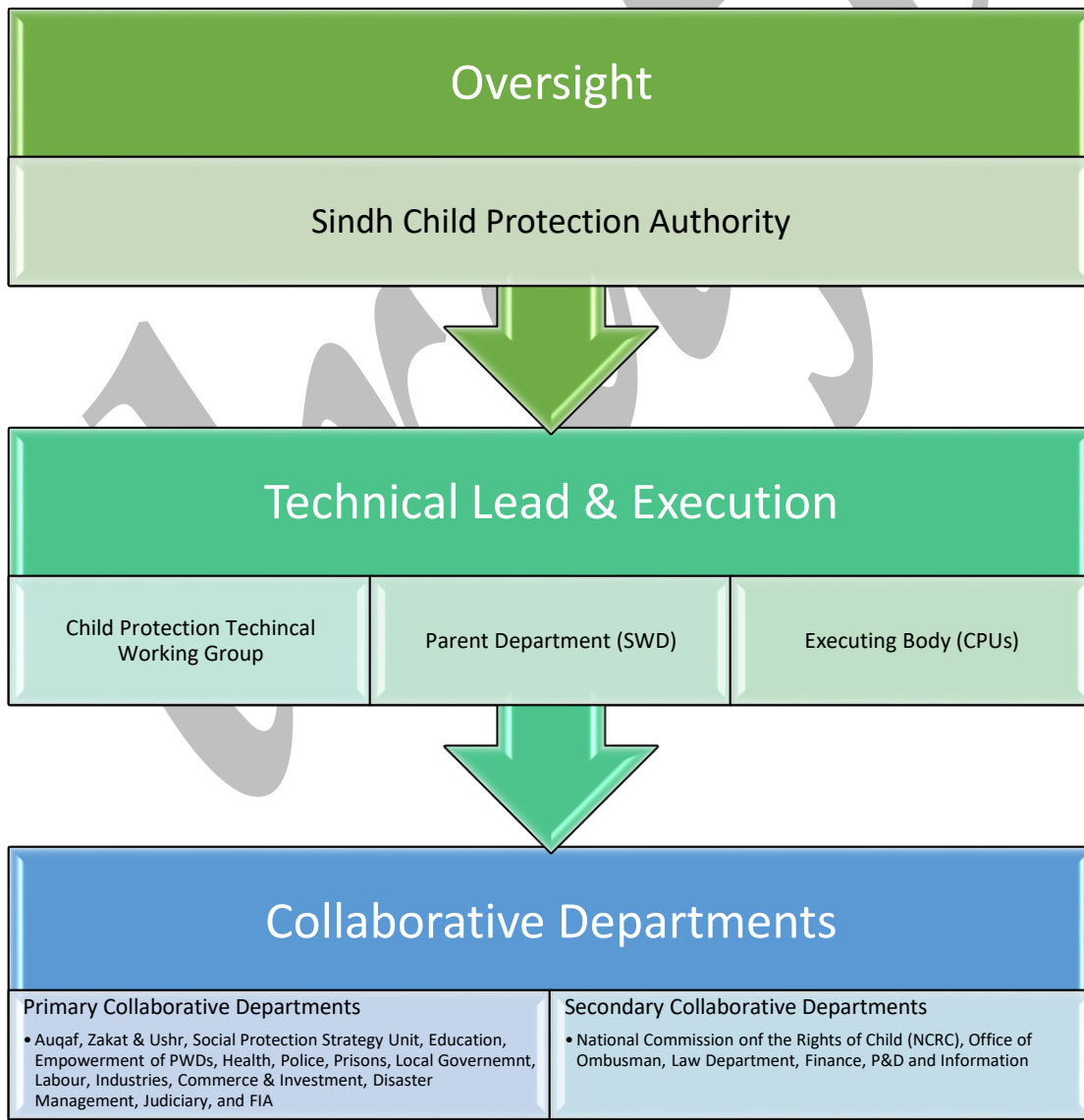


Figure 2: Child Protection Institutional Structure in Sindh

5.3.1 Oversight Body – Sindh Child Protection Authority

- a. Liaise with law department and National Commission on Rights of the Child (NCRC) for the development of relevant policies, required amendments in laws and rules/procedures towards improving child protection services and the overall CP-CMRS.
- b. Oversee performance of authorized bodies for child protection including Social Welfare and, CPUs.
- c. Review and assess the progress of all relevant institutions particularly those listed in this policy against their roles and responsibilities as assigned in this policy.
- d. Measure the progress made every three years and formulate observations and recommendations, furnishing them to the Chief Minister of Sindh for onward actions and intimation to respective departments and institutions.
- e. Bring together all key public and private institutions and stakeholders for child protection system strengthening and for taking interagency multisectoral initiatives.
- f. Ensure an effective multisectoral coordination among all key departments and agencies.
- g. Develop consolidated action plan in consultation with all relevant departments, to coordinate, review, and assess annual performance and revisions in SOPs and protocols if required.
- h. Standard setting and quality-benchmarking with implementation guidelines and support for effective child protection system including prevention and response programmes and initiatives.
- i. Register all alternative care providers, authorizing them to become operational.
- j. Rollout the gatekeeping mechanisms and standards (including monitoring framework) and ensure the compliance to avoid unnecessary placement of children into alternative care and strengthen family-based care, promote deinstitutionalization and the reform of care systems more broadly.
- k. Ensure standards of care are developed for all alternative care providers¹⁶, including provisions for case management, children’s involvement in decisions about their placement and family contact, unless contrary to their best interests.
- l. Ensure all alternative care providers are registered and authorized to operate, and mechanisms are in place for independent inspection and monitoring visits.
- m. Form and strengthen Child Protection Technical Working Group (TWG) to oversee child protection situation across departments and province.
- n. Conduct Child Protection Performance and Resourcing Audit, at least every third year¹⁷.
- o. Commission Child Protection research and studies for further learning and to generate evidence for reforms and effective programming.
- p. Advocate for and promote child protection focused research to learn and generate evidence for evidence-based reforms and further improving the child protection system.
- q. Play a proactive role in reviewing, advising and guiding the mainstreaming of child protection and/or focused initiatives within specific development schemes and funding allocations.

¹⁶ Any individual or group of individuals, family or institution engaged in the provision of care services for children other than their biological parents, by the law, or customs, or through any other informal arrangement.

¹⁷ The Child Protection Performance and Resourcing Audit includes revisiting this child protection policy and reviewing it against any contextual changes and accordingly update if the need is critical. It also includes the self-assessment of the Chief Minister’s Office’s performance against the roles and responsibilities defined in this policy

- r. Ensure approved PC-1 for the functioning of the child protection system and related activities, recruitment (authorized regular positions through SNE¹⁸), capacity building, infrastructure in consultation with all service providers.
- s. Coordinate development of multi-sectoral PC-1 of other service providers focusing on Child Protection.
- t. Ensure that a prevention strategy for children's protection is in place and respective action plans are established.
- u. Ensure a designated toll-free (24/7) Child Protection helpline, available across the province.

5.3.2 Child Protection Technical Working Group

- a. Extend technical support to establish inter-departmental coordination mechanism against the roles and responsibilities assigned in this policy and follow-up on the progress accordingly.
- b. Draft and submit recommendations to Child Protection Oversight Body for resource allocation to protect children from all forms of abuse, violence, neglect and exploitation.
- c. Monitor the implementation and compliance of the child protection policy across the board (i.e., compliance by all relevant departments);
- d. Ensure a range of regulated emergency, short-term and long-term alternative care options, including kinship care, respite care, foster care, supervised independent living arrangements, *kafalah* and residential care.
- e. Develop the standards of care for all alternative care providers, including provisions for case management, children's involvement in decisions about their placement and family contact, unless contrary to their best interests.
- f. Develop procedures and mechanisms for the provision of alternative care for children without adequate parental care, in line with best interests and prioritizing family-based care.
- g. Make amendments in respective policies, procedures and registration processes for all alternative care providers.
- h. Develop the inspection and monitoring framework for alternative care providers.
- i. Develop the Complaint Response Mechanism (including reporting channels and response system) for children in alternative care.
- j. Ensure that the registration process of alternative care providers includes the compliance with the Complaint Response Mechanism.
- k. Review and analyse periodically the effectiveness and efficiency of Complaint Response Mechanism for children in alternative care.
- l. Develop gatekeeping mechanisms (including standards and monitoring framework) to avoid unnecessary placement of children into alternative care and strengthen family-based care, promote deinstitutionalization and the reform of care systems more broadly.
- m. Develop, review and revise gate-keeping standards and SOPs for the placement of unaccompanied and separated children into alternative care arrangements particularly institutional care.
- n. Ensure regular professional development support to the human resource at key relevant departments and agencies, across all levels.

¹⁸ Salaried Non-exempt

5.3.3 Child Protection Parent Body – Social Welfare Department (SWD)

- a. Support the SCPA in interagency and multisectoral coordination (i.e. bringing in all departments listed in the policy including civil society for joint meetings, plannings, sessions and for operational coordination) for the prevention and response to child protection concerns in the province.
- b. Develop and implement programmes for prevention of child protection issues using effective social and behavioural communication change strategies and plans.
- c. Ensure the provision of alternate care arrangements to the unaccompanied and separated migrant children considering their best interest; ensure that children in need of alternative care are provided with family-based care whereas institutional care remains the last resort.
- d. Assist SCPA to put in place monitoring and accountability mechanisms for the implementation of child protection system and wellbeing of children in alternative care arrangements
- e. Monitor the implementation performance of Complaint Response Mechanism for children in alternative care on monthly basis to address the gaps and challenges.
- f. Assist the SCPA to put in place standards of care for all alternative care providers, including provisions for case management, children’s involvement in decisions about their placement and family contact, unless contrary to their best interests.
- g. Make independent inspection and monitoring visits to alternative care providers for compliance to agreed benchmarks and standards.
- h. Implement and monitor the gatekeeping mechanisms and standards to avoid unnecessary placement of children into alternative care and strengthen family-based care, promote deinstitutionalization and the reform of care systems more broadly.
- i. Assist and support the SCPA for developing and implementing a provincial prevention strategy for children’s protection and in developing follow-up action plans
- j. Ensure a designated toll-free (24/7) Child Protection helpline (1121¹⁹) is available and managed across the province.

5.3.4 Executing Body – Child Protection Units (CPUs)

- a. Ensure the systematic identification, assessment, screening and referral of child protection cases by relevant social service practitioners, or investigation by social workers (including CPOs), and their referral and/or provision of appropriate and relevant promotive, preventive and responsive protective services, including initial psychosocial support, referrals, access to care and protection services, alternate care arrangements and so on.
- b. Ensure the supervision of the safety, well-being and development of any child placed in alternative care.
- c. Implement the procedures and mechanisms for the provision of alternative care for children without adequate parental care, in line with best interests and prioritizing family-based care.
- d. Implement Complaint Response Mechanism for children referred to alternative care by the CPU.
- e. Manage the Child Protection Officers at the CPU.
- f. Manage the CPU’s Child Protection Information Management System (CPIMS) ensuring effective data management and confidentiality.

¹⁹ to provide emergency assistance to protect children in the province against any injustice or abuse

- g. Participate in Child Protection research and studies for further learning and to generate evidence for reforms and effective programming.

5.3.5 Collaborative Departments

Some over-arching key roles for all the collaborative departments (which include primary and secondary collaborative departments) in the child protection system are as follows:

- a. Ensure the capacity building of relevant personnel from collaborative departments, particularly the child protection focal points about the child protection system, their roles and responsibilities to support the system work.
- b. Ensure inclusion of prevention strategies (explained later in the policy) are part of current child protection plans.
- c. Ensure relevant personnel from collaborative departments understand and are well versed in inter-departmental/agency coordination agreement/referral mechanism.
- d. Ensure all duty bearers from collaborative departments are aware of child protection case management and referral system for reporting cases of children in need of protection to appropriate authorities.
- e. Identify and refer any case of child in need of protection to the appropriate authorities.

5.3.5.1 *Primary Collaborative Departments*

- i. Auqaf Religious Affairs, Zakat & Ushr Department
 - a. Ensure that children in need of protection are provided access to social support initiatives/programs that are inclusive of children's protection support.
 - b. Ensure that family-based care is given priority for the children in the need of alternative care, whereas institutional care must be considered only as a last resort.
- ii. Social Protection Strategy Unit
 - a. Ensure that children in need of protection are provided access to social support and social assistance schemes.
 - b. Ensure that family-based care crosscuts as a condition to the social assistance schemes and other social protection initiatives, whereas institutional care must be considered only as a last resort.
 - c. Extend support to the poverty-stricken families with at-risk children, preventing children from being trapped into hazardous labour, through social assistance schemes.
- iii. Education
 - a. Introduce programmes to bring back out of school children, involved in labour and into formal education or alternative learning pathways.
 - b. Initiate and implement scholarship schemes for out of school children with the support from Zakat & Ushr.
 - c. Develop/deliver teacher training curricula with support from Development Groups of Education Department; that support a more protective learning environments by including training on psychological first aid, social and emotional learning (SEL), gender- and disability-sensitive approaches, positive discipline, participatory methods, child protection principles and concerns.

- d. Expand the list of indicators used for data collection by Education M&E team to include child protection related indicators and collect data against them too.
 - e. Develop and implement the programmes to impart digital literacy to the children aimed at enhancing their self-protection (preventive) skills particularly collaboration, creativity, critical thinking, citizenship and communication.
 - f. Establish Digital Lab/Automation Units in the districts.
 - g. Ensure safe learning environment for the children at schools and safe passage to and from schools, including children with special needs as part of prevention efforts.
 - h. Ensure comprehensive prohibition of all kinds of punishments including physical, psychological or emotional as part of prevention strategy.
 - i. Support and expand life skills- based education programmes at school with the support of Development Groups of Education Department.
 - j. Initiate School based Awareness Workshops on Online Safety.
- iv. Department of Empowerment of Persons with Disabilities
- a. Introduce programmes to mainstream children with disabilities into formal regular or formal education/alternative learning pathways.
 - b. Initiate and implement scholarship schemes for children with disabilities (those with pre-existent economic needs) with the support from Zakat & Ushr.
 - c. Develop/deliver teacher training curricula with specific focus on needs of children with disabilities and modern inclusive education techniques.
 - d. Develop and implement the programmes to impart digital literacy to the children with disabilities aimed at enhancing their self-protection (preventive) skills particularly collaboration, creativity, critical thinking, citizenship and communication.
 - e. Ensure safe learning environment for the children with disabilities at schools and safe passage to and from schools, as part of prevention efforts.
 - f. Initiate school-based Awareness Workshops on key issues faced by the children with disabilities.
- v. Health Department
- a. Launch integrated reproductive health and child protection programs with education for children for the prevention of potential sexual abuse, violence, and exploitation.
 - b. Integrate child protection content (guidelines, tools, messages) into Lady Health Workers' (LHWs) and under-graduate doctors' training curriculum and scope of work i.e., Household Visits;
 - c. Integrate child protection and abuse into formal medical education syllabus.
 - d. Revive Child Protection Committee at health facilities' levels.
 - e. Identify and refer child abuse, exploitation or violence cases to relevant service providers along with assessing the medical needs and forensic record for timely treatment and delivery of specialized mental health and psychological support, where needed.
- vi. Sindh Police Department
- a. Ensure all police personnel are well versed in child protection legal framework (including JJSA 2018);
 - b. All police stations have separate, gender-segregated facilities for children, including for detention purposes and for registration of FIR if a child is accused.

- c. Police Manual should be updated with protocols for timely information sharing and referrals of specific child protection cases particularly defining Mandatory Reporting of specific cases and also provide facilities/services for online reporting.
 - d. Work with FIA and other relevant agencies to ensure that children are prevented from abductions, violence, trafficking etc.
 - e. Work with Anti-narcotic Force to ensure that children are prevented from drugs and substance use.
 - f. Establish/Strengthen Policy Community Committees/Citizen Police Liaising Committees for the prevention of child protection incidents in respective communities.
 - g. Monitor local restaurants that have localized/small movie theatres and ensure that children are not facilitated or encouraged to watch movies with adults particularly those with adult content.
 - h. Ensure children's access to safety and security as per the law and constitutions of Pakistan
 - i. Ensure all proceedings and procedures are child-friendly and have been developed through child participation and in the best interest of the children.
 - j. Child friendly investigation procedures and structures are in place to deal with children coming in contact with law.
- vii. Sindh Prison
- a. Ensure all jail/prisons personnel are well-versed in child protection legal framework and JJSA 2018, as well as its linkages with the child protection system.
 - b. Ensure that Juveniles have separate institutes/centres (such as Borstal Institutes) in each district.
 - c. All jails/prisons should have separate, gender-segregated facilities for children.
 - d. *Jail Manual* should be updated with protocols for child protection cases referrals and general procedures related to children's protection.
- viii. Local Government Department (in collaboration with NADRA)
Ensure the provision of universal birth registration at public and private hospitals, BHUs, and maternity clinics.
- ix. Labour & Human Resources Department
- a. Introduce and administer child-sensitive employment policies and family-friendly policies (maternity, paternity, adoptive and surrogate leave benefits)
 - b. Enforce child friendly inspection, monitoring, prevention and prosecution of child labour.
 - c. Ensure regulation and monitoring of children in hazardous work or other worst forms of child labour.
 - d. Ensure that no child and/or adolescent is employed in exploitative or hazardous form of labour.
 - e. Ensure that the industrial and commercial systems and mechanisms are in place to prevent children's engagement in labour.
- x. Industries and Commerce Department
- a. Ensure wide-spread awareness, education and culture is developed to ensure safeguarding of children from any potential or actual abuse, exploitation, neglect or harm in conducting businesses whether children are directly employed or not.

- b. Ensure that systems are in place to assess the business against any potential harms that can be caused to the children directly or indirectly due to the nature of business, industry, products or services or due to business processes.
- xi. Provincial Disaster Management Authority (PDMA) Sindh
- a. Ensure that disaster management, preparedness and response plans include specific protection needs of children particularly as part of pre-positioned supplies and humanitarian assistance packages (monetary and non-monetary).
 - b. Ensure coordination and participation of key protection players including government departments and civil society organizations to ensure children's protection needs are addressed in disaster response services.
- xii. Gender & Children Cell (PDMA)
- a. Ensure that children and communities are prepared to deal with emerging protection concerns, have family tracing and reunification system and protocols in place and minimize incidences of separated and unaccompanied children during any crisis.
 - b. Ensure that there are mechanisms and systems in place during humanitarian crises to prevent children from any harm including but not limited to violence, early and forced marriages, sexual abuse, kidnapping and trafficking.
- xiii. Judiciary – Children Courts (Juvenile Justice Systems Act JJSA 2018)
- a. Ensure all judicial personnel (judges, lawyers, prosecutors) are well versed in the child protection legal framework and JJSA 2018 that is the statutory framework for children who come into conflict with law within the juvenile justice system, and its linkages with the child protection system; whereby any juvenile offender/perpetrator who experiences any form of abuse, violence, exploitation or neglect should be able to access the child protection system.
 - b. Associate judges with the Sindh Child Protection Authority.
 - c. Ensure the Best Interest of Child in dealing with processes, decisions, placements and so on for the children in need of protection and their caregivers.
 - d. Ensure that already established network of dedicated child courts are extended further at sub-provincial level.
- xiv. Directorate General of Religious Education (Regional Office Sindh)
- a. Develop/deliver teacher training curricula that support a more protective learning environments by including training on psychological first aid, social and emotional learning (SEL), gender- and disability-sensitive approaches, positive discipline, participatory methods, child protection principles and concerns.
 - b. Develop and implement programmes to impart digital literacy to the children, aimed at enhancing their self-protection (preventive) skills particularly collaboration, creativity, critical thinking, citizenship and communication.
 - c. Ensure safe learning environment for the children at schools and safe passage to and from schools, including children with special needs as part of prevention efforts.
 - d. Ensure comprehensive prohibition of all kinds of punishments including physical, psychological or emotional as part of prevention strategy.

- e. Support and expand life skills- based education programmes at *madaris*.
- xv. Federal Investigation Authority (FIA)
 - a. Maintain a robust monitoring system to identify and prosecute the operating gangs involved in abductions of children, child trafficking (internal and external) and engaging children into worst forms of forced and hazardous labour (such as sexual exploitation, beggary and so on) at the provincial level.
 - b. Work with police and child protection parent department (Social Welfare Department) to put in place mechanisms and structures to support the children recovered from FIA's operating gangs.
 - c. Develop the protocols to ensure children's safety and safeguarding in armed and unarmed actions, following the *Do No Harm* guiding principle.
 - d. Monitor, track and capture organized gangs involved in making children addicted to drugs and becoming substance users.
 - e. Detain specific individuals/groups involved in child pornography (including showing any specific materials, voice recordings, online content or any such kind of contact with children) directly or indirectly.
 - f. Review relevant laws considering children's best interest and recognize in-country abductions as internal trafficking.
 - g. Develop mechanisms, protocols and checks for children's protection from any kind of online bullying, abuse, exploitation, harassment and child pornography at any medium in the fast-paced Information and Technology (IT) environment.

5.3.5.2 Secondary Collaborative Departments

- i. National Commission on the Rights of Child (NCRC)
 - a. Spread awareness and promote dialogue on child rights among various sections of the society and promote awareness of the safeguards available for protection of these rights
 - b. Engage itself with policymakers, media, civil society and other relevant to highlight the promotion and protection of child rights.
 - c. Inquire into violation of child rights and recommend to the relevant agency or department initiation of proceedings in such cases.
 - d. Examine all factors that inhibit enjoyment of rights of child, such as violence, abuse and exploitation, trafficking, torture, pornography and prostitution and recommend appropriate remedial measures.
 - e. Call for information or report from the civil society organizations and autonomous or concerned bodies inquiring into complaints of violations of child rights
- ii. Office of the Ombudsman Sindh
 - a. Study, Diagnose and Advise on systemic issues concerning Children's Rights.
 - b. Monitor Implementation of Child Commissioner's Recommendations.
 - c. Raise awareness on Children's Rights Violations.
 - d. Proactively bring Children's voice in policy making arenas.
 - e. Examine and investigate complaints made by or on behalf of children.
 - f. Establish and run a toll-free complaint helpline service for children, to register complaints and update status to the complainants.

- iii. Law Department
 - a. Provide technical feedback on draft bills related to child protection on the request of any relevant government or non-government agency before they are presented to the provincial assemblies.
 - b. Ensure timely and effectively development of rules and procedures as soon as any child protection related bills is enacted.
 - c. Include the key concepts of child protection and safeguarding in the curriculum of Judicial Academy.
- iv. Finance Department
 - a. Ensure that annually at every budget cycle, all collaborative departments part of the child protection system have financial provisions against their plans (PC-1) for child protection prevention and response services.
 - b. Ensure that planning, resourcing and monitoring of public expenditure is carried out regularly against children's care, protection and development approved by the provincial government.
- v. Planning and Development Department
 - a. Ensure that specific child protection plans are part of annual development plans.
 - b. Ensure a continuous monitoring of annual development plans furnished by the departments specifically with respect to child protection.
- vi. Information Department
 - a. Ensure protection of children from any exploitation, abuse, commercial use, exposure, neglect in media either through content or physical appearance of children.
 - b. Ensure child sensitive reporting in media and build the capacities of media personnel on child protection and safeguarding.
 - c. Educate and create awareness among masses for the prevention of child protection violations.

5.4 Programmes and Services

5.4.1 Prevention

Successful child protection begins with ensuring there is a protective environment in place to prevent children's right to protection from being violated and ensure children's well-being and development. Investment in prevention is imperative for child protection systems' strengthening.

The government holds the primary responsibility for ensuring accessible, child-friendly, gender-sensitive, prevention strategies and establishing approaches that (1) operate at different levels: child, family, community, society; (2) across different sectors: social, education, health and so on; and (3) create a continuum of services spanning prevention and response (as illustrated in Figure 4). Other service providers, such as, civil society and the private sector, may implement prevention interventions, however the government is ultimately responsible for defining the roadmap and ensuring quality.



Figure 4 Child Protection Preventive and Response Services

Moreover, a preventive environment also includes open discussion, including engagement of media and civil society; attitudes, customs and behaviours to target the social norms and social

and cultural practices and beliefs through Advocacy, Community Mobilization and Social and Behavioural Change Communication (SBCC) components of the Child Protection System.

Doing so often requires modifying deeply ingrained social and cultural norms and behaviours; in particular, the idea that some forms of violence are not only normal, but sometimes justifiable.

5.4.1.1 Prevention: Strategies & Approaches

Prevention strategies and approaches should adopt a public-health approach in their design and delivery, which is: (1) population-based; (2) evidence-based; (3) proportionate and progressive, combining universal and targeted interventions to protect children and linked to response services; and (4) partnership-based working across different services and sectors.

Provincial and Local government should take the lead in implementing the prevention strategies and approaches in collaboration with all key stakeholders. Prevention strategies and approaches supported by this policy are divided into two connected areas which are complemented by the multi-sectoral approach and behaviour change communication:

1. Social and gender norms to promote behaviours that are supportive to a child's right to protection.
2. Child Protection systems that prevent child protection violations at scale.

5.4.1.1.1 Social and Gender Norms

Social and gender norms that are supportive of a child's right to protection must be promoted. Changing attitudes and norms in society is an important part of preventing abuse, neglect, exploitation and violence against all children (including transgender children). Doing so often requires modifying deeply ingrained social and cultural norms and behaviours – in particular, the idea that some forms of violence are not only normal, but sometimes justifiable. Strategies and approaches in this section focus on (i) parenting programs, (ii) school-based programs, and (iii) community-based interventions.²⁰

i. Children

- a. Improve children's knowledge about child abuse, neglect, violence and exploitation, and how to protect themselves against it²¹;
- b. Support life skills programs that integrate attention to human rights, gender norms, healthy relationships and violence, and provide positive alternatives to children.
- c. Support school-based violence prevention programs (e.g., 'Safe to Learn').
- d. Strengthen girl and boy and adolescent participation, voice and empowerment, and engagement with young people's organizations and networks as well as organisations of persons with disabilities.

ii. Parents, Caregivers and Households

- a. Promote and support inclusive positive parenting education and support services for mothers, fathers and other caregivers – as part of a broader approach to nurturing care–reinforced by SBCC strategies and paying particular attention to age groups.

²⁰ Adapted from UNICEF's 2021-2030 Consultation Paper.

²¹ WHO (2016). INSPIRE: Seven strategies for ending violence against children.

- b. Support inclusive and accessible social care and support services (e.g., home visits), particularly for vulnerable families.
- c. Support cash transfer and other social protection programs; especially those that address or evaluate the impact on girls' and women's empowerment and safe transitions to adulthood for girls and boys.

iii. Communities and Societies

- a. Support SBCC strategies to change harmful social norms around gender, violence, discrimination and care.
- b. Engage with communities and community-based organizations to prevent and respond to child abuse, neglect, violence and exploitation, as well as all forms of discrimination, including on the basis of gender and against those who identify as non-binary.

5.4.1.1.2 Child Protection System

i. Children

- a. Support universal free birth registration.
- b. Increase children's access to more effective, gender-equitable education and social-emotional learning and life-skills training and ensure that schools environments are safe and enabling.
- c. Ensure institutions such as temporary and alternative care facilities, orphanages, police stations, detention centres and *madaris* are safe for children.

ii. Parents, Caregivers and Households

- a. Support cash transfer and other social protection programs aimed at the economic strengthening of families.
- b. Support ongoing efforts to challenge harmful cultural norms and practices.
- c. Support informal and family-based community care (e.g., kinship and foster care) to eliminate reliance on residential/institutional care.

iii. Communities and Societies

Support safe community environments in locations where children gather and spend time.

5.4.1.2 *Multisectoral Approach to Prevention*

Preventing child maltreatment requires a multisectoral approach. This may include:

- a. Joint awareness raising media or digital campaigns by Social Welfare, Education, Health and Law Enforcement Agencies to challenge specific harmful practices and norms.
- b. Joint behavioural change efforts by the community workers, health staff (such as LHVs) and education staff (such as teachers) to provide support, education and information to parents and children at their homes, health facilities and schools.
- c. Parent education jointly carried out by the social workers, health and education staff, usually delivered in groups, to improve child-rearing skills, increase knowledge of child development, and encourage positive child management strategies; and
- d. Multi-component interventions, which typically include support and education of parents, pre-school education, and childcare.

Programmes to prevent child sexual abuse can be delivered in schools, health facilities, borstal institutes, rehabilitation centres, temporary care facilities, alternative care settings, and teach children about:

- a. body ownership
- b. the difference between good and bad touch
- c. how to recognize abusive situations
- d. how to say "no"
- e. how to disclose abuse to a trusted adult.

Potential effects of norms and value change on reducing violence against children include:

- a. Reduced acceptance of violence against women and children.
- b. Less acceptance of and tendency towards early and forced marriage.
- c. More favourable beliefs towards gender equity and gender-equitable division of labour.
- d. More favourable attitudes to non-violent approaches to parental discipline.
- e. Greater recognition of what constitutes abusive behaviour towards children.
- f. Increased bystander intervention to prevent violence against children.
- g. Reductions in physical or sexual violence by a parent/guardian.

5.4.1.3 Behaviour Change Communication

One of the key preventive strategies for the children's protection is Behaviour Change Communication (BCC). BCC attempts to bridge the gap between information, a person's knowledge, attitudes and subsequent behaviour. This approach addresses the knowledge, attitudes, practices and skills of individuals, families and communities as they relate to specific programme goals. Within a participatory communication framework, individuals and communities gain knowledge, appreciations and skills that motivate them to develop positive, healthy and protective practices. BCC requires the use of an appropriate mix of communication channels - interpersonal, group, community and mass media. Behaviour change communication has proven to be more effective when complemented by well-planned and well-implemented advocacy and social mobilisation strategies.

The preventive measures can be extensive, however at minimum, the following should be implemented by key child protection bodies (see 5.3) in collaboration with civil society organizations and private sector. Exact responsibilities to implement the following measures as standalone or together, have to be agreed in the action plan as a follow-up step to this policy.

5.4.1.3.1 Awareness Raising

Awareness raising on key child protection issues, protective factors, available services, provisions in laws, reporting channels and protocols to access services is critically important. Increased knowledge of masses on key aspects leads to reduced incidents of child protection issues, helps monitor the situation at wider scale and increases reporting of incidents for efficient response. Various ways and tools can be opted; a few are listed below for the child protection bodies to plan and apply:

- a. Run child protection awareness raising digital and social media campaigns on specific child protection concerns
- b. Map electronic media coverage, particularly radio and national broadcasting channels, to design and implement awareness raising electronic products on specific child protection issues
- c. Engage with print media to raise the awareness of masses through print products such as leaflets, brochures, reader friendly versions/briefs of services, laws and so on
- d. Commemorate Universal Children's Days to raise awareness at community levels
- e. Engage with communities through community-based awareness raising events such as theatrical performances, seminars, dialogs and so on.

5.4.1.3.2 Community Mobilization

The purpose of social mobilisation is to bring together relevant inter-sectoral partners to determine needs and raise awareness for an objective. It involves the identification of organisations, institutions, groups, networks and communities who can contribute their efforts and resources. It involves facilitating their participation to realise the goals of the program. Community mobilisation helps build the capacity of these mobilised groups in the process, so that they can further mobilise resources, and plan, implement and monitor programme activities with the community or camps as the case may be. This approach should support actions and priorities identified by communities, especially the most vulnerable groups whose rights tend to be consistently denied. Social mobilisation activities should stem from community action but must receive support and coordination services. Some of the key interventions that can be made are as under whereas exact responsibilities can be allocated to specific child protection body in the follow-up action planning:

- a. Establish community-based structures/networks (men and women both) through engaging with communities at broader levels in the villages and urban residential pockets
- b. Strengthen the capacities of the community-based structures on key child protection aspects (such as child protection concepts, rural appraisal tools, child protection monitoring, reporting and locally led responses, referral mechanism and so on)
- c. Support the community-based networks in developing and implementing community-led local actions for monitoring and prevention of child protection issues at their levels
- d. Engage with communities on child protection, through community dialogues, meetings, community-based events

5.4.1.3.3 Advocacy

Advocacy is directed at different levels of decision makers, including people who have the power to create policies, programmes and structures and to allocate resources. By persuading decision makers to decide in favour of a cause, advocacy seeks to develop, change or modify an existing law, policy and/or administrative practice. It is a continuous and adaptive process of gathering, organising and transforming information into arguments. These arguments are then communicated to decision makers, to influence their choices to raising resources (human and financial) or demonstrating political or social leadership and commitment. A goal of advocacy is to influence leaders and decision makers at different levels to make it easier for affected communities, families and individuals to make healthy choices for their own physical and social well-being, and ultimately to protect the rights of children to protection. Advocacy is thus important for an effective

child protection system. There are a number of changes which will be required at multiple levels; and key child protection actors – even public departments – will have to advocate for them. A few of key measures may include but are not limited to:

- a. Identify key advocacy priorities through review and evaluation of provincial child protection framework and system
- b. Develop a focused and comprehensive advocacy strategy focused on identified advocacy priorities
- c. Conduct stakeholders’ mapping and analysis to identify key actors to influence and collaborate with for advocating changes
- d. Design and implement advocacy interventions and events in collaboration with advocacy alliances and with the support of communication products
- e. Periodical reviews of advocacy priorities and revisions in advocacy strategy as per changing context

This is to particularly note that the aforementioned interventions are highly linked with the availability of professional and trained human resource. The policy in later sections has further details on Social Service Work Force for Child Protection which comprises of existing and new positions at relevant departments. As the workforce is linked with prevention and response both, it is thus covered in 5.5.

5.4.2 Response

In the purview of Sindh Child Protection Policy, a ‘case’ refers to a child or a group of children in need of protection, for whom services are provided. Individual case management is the process of identifying and taking action on issues that affect children on a case-by-case basis.

Case management is a method of providing services whereby a desk officer (for case management or child protection officer) /social worker arranges, coordinates, monitors, evaluates, and advocates for multiple services to meet the specific and sometimes complex needs of a child or a group of children. Case management addresses both the individual client’s psychosocial status as well as the social system in which they are living. Case management requires the desk officer (for case management or a child protection officer) /social worker to develop and maintain a therapeutic or child-centred relationship with the child and his/her family, which may include linking them with departments and agencies that can provide needed services, resources, and opportunities. Therefore, response to child protection issues has to be a holistic and coordinated effort recognizing the duties of all people at all levels abiding by the child protection principles and applying these to all children in all circumstances without discrimination.

5.4.2.1 Procedures for Reporting cases of Child Abuse, Exploitation, Violence & Neglect

Anyone can report a suspected child protection case through available means including helpline, by walking into a District Child Protection Unit (CPU) or alternate means such as posting a letter/email to the concerned authority, as is feasible to the person. A few critical steps at this stage are:

1. Ensure that child survivor has given consent to report the case, if the child is at the age of giving his/her consent him/herself. If a child is mentally or physically challenged to give consent, ensure that the consent to report is secured by the caregiver or any other trusted family member.

2. Ensure that the consent is taken from immediate caregiver of the child or from any other family member whom the child trusts in case the perpetrator is the caregiver him/herself, however in instances where the child or the caregiver may not be accessible and by not reporting, the child's risk to her/his safety and survival increases, the case must be reported immediately. In such a situation, the consent will however be secured at an appropriate time during case management but surely before initiating interventions.
3. Mandatory Reporting – The only exception to report the case even if the consent is not given are:
 - a. When the child's life or safety is in danger, or
 - b. By not reporting the case, the life of any other individual can be at risk²².

The CPU has the full responsibility for case management and referral of all reported child protection cases in the district. The specific functions of the CPU are:

- a) Identify, receive and register report(s) of alleged child abuse.
- b) Having received a report of an alleged child abuse, undertake an initial assessment whether the child requires protection under the provisions of the child protection legal framework. If further information is required, undertake a comprehensive assessment to learn about the child's protection needs in more detail, as well as the protective and risk factors relevant to the child in his or her circle of support (and harm, such as the family, neighbourhood, school, and community and so on, so that a uniquely individualized case plan can be developed for that child.
- c) pursuant to a formal determination that a girl or boy requires protection under the child protection legal framework, develop and maintain a gender appropriate child protection plan.
- d) manage data effectively and confidentially through a Child Protection Information Management System (CPIMS).
- e) in accordance with the child protection plan, refer the child to relevant departments/agencies at the district level (obligatory to comply with requests) for provision of applicable child protective services.
- f) manage reported cases of child abuse, including maintaining a record of reports, monitoring cases and following-up until case closure.
- g) collect, maintain, and update gender and age disaggregated child protection case management data.
- h) monitor the application of child protection regulations at the district level; and,
- i) take preventive measures through a comprehensive communication strategy, plan, and products.

Under this policy, establishment of *inter-departmental coordination agreement* for a coordinated child protection case management referral mechanism becomes critical and all key departments must adhere to the following:

²² For instance, a child in an unstable mental state after a specific incident due to which he/she can endanger his/her family members' safety. Such act can be directed for instance stabbing someone or indirect likes lighting the house to fire.

- a. Designate a child protection focal point and inform the communities and other institutions that they can contact the specific focal point in case of any suspected child protection case. The respective departments will share the contact details of the focal points widely.
- b. A toll-free telephone number is made available to report any suspected child protection case.
- c. Put in place a system to ensure the confidentiality of the case (online and off-line).
- d. All departments are to be made aware of case management guidelines and protocols along with their responsibilities to support the system.

5.4.2.2 Custodianship of Child Protection Cases, Referrals & Case Management (including Central System for Responses)

The custodianship of all CP cases mainly lies with the SCPA. In this connection, the SCPA will ensure that comprehensive guidelines and protocols are established for the child protection case management and referral system. Additionally, SCPA will also ensure that all key government departments and non-governmental organizations are trained and oriented on:

- Sindh Child Protection Policy together with its supplements i.e., Safeguarding Policy and Data Protection & Confidentiality Policies.
- Case Management Guidelines and Protocols.

A desk officer (for case management or a child protection officer) is the primary provider of case management services. Once the CPO has identified and engaged the child in possible need of protection, he or she should determine the eligibility of the case and accordingly register the case. Thereafter, the child protection or a desk officer should conduct an in-person assessment with each child to seek information about the case. This assessment will document child's circumstances, challenges, needs, risks, social and financial situation, what resources are available with the family and required to provide protection, care and support.

Based on the assessment, the CPO develops a child protection plan with the child and his/her family that identifies the priorities and outcomes of the intervention and the strategies and resources required during the process. The direct contact between CPO and child is essential to effectively accomplish the assessment and develop the child protection plan.

It is incumbent upon the parent department and the executing agency to mobilise the formal and informal resources and the services needed to protect children in all settings and coordinate and monitor the services delivered till case closure. The allocated child protection or desk officer also:

- a. Advocates on behalf of the child for needed resources and services.
- b. Periodically reassesses child status, the effectiveness of interventions, and the attainment of outcomes with revision/review of the child protection plan.
- c. Determines the duration of support; and
- d. Provides recommendations for case closure.

Effective case management should be culturally and individually sensitive and should involve the child, family and wider community. The assigned case worker should provide end-to-end service until the case is concluded, or the family and community are able to manage the situation without further outside intervention.

To summarise, below are the key steps which must be made part of the guidelines:

- **Identification** of children requiring services: gathering, recording and analysing information.
- **Assessment** of child's needs.
- **Planning** of interventions and sharing decision making with child/family once the consent has been taken.
- **Implementation** coordinating and delivering services.
- **Reviewing and evaluating** progress.
- **Follow-up** and monitoring; and
- **Case Closure** and re-opening if required

5.4.2.3 Data Protection and Confidentiality

Data on child protection is particularly sensitive. It should only be collected, stored, or shared with the individual's explicit written consent, adhering to the principles of 'need to know,' and according to protocols developed as supplement to this policy.

Data protection and data security is the responsibility of every staff member who works with cases or has access to case information. Staff should be clear about why they are collecting data and should not collect or share any personal information other than in accordance with best practices and international standards. Data protection should also cover back up in case of loss of data which could be due to multiple factors including accidents, calamities and so on. The Data Protection & Confidentiality Supplement to this policy provides further guidance on data protection and confidentiality.

5.5 Social Service Workforce for Child Protection

Skilled and quality human resource plays a pivotal role in effectiveness and efficiency of child protection system. It is thus important to define and strengthen the Social Service Workforce for Child Protection. As the child protection system requires strong coordination and collaboration among many agencies, likewise, the strengthening of and managing the workforce also requires the same level of coordination and collaboration.

It is the workforce which serves to operationalize the coordinated delivery of available services on the ground, and it consists of all those who have a formal role in the system, including governmental and non-governmental stakeholders, civil society and private sector, as well as those who operate in an 'informal' capacity.

The 'formal' workforce includes, for example:

1. Child Protection Officers at CPUs who serve as the 'hub' of all case management and referral activities once a case enters the Child Protection system
2. Child Protection focal points at collaborating departments
3. School administrators and teachers encountering children in need of protection
4. Health care workers such as doctors and nurses treating injuries resulting from abuse
5. Mental health professionals such as psychiatrists, psychologists, and counsellors
6. Police officers responding to cases of child abuse
7. Lawyers and magistrates working on child protection cases

8. Child Helpline workers who receive protection-related calls and in turn refer CP cases
9. NGO sector staff who work on child protection programmes, in collaboration with government, especially with the CPU

These aforementioned gatekeepers will also identify cases of abuse and will report to CPU for registration.

The ‘informal’ workforce may include, for example:

1. Community leaders or organizations becoming aware of child abuse cases
2. Religious leaders learning of child abuse cases
3. Child peers at school or elsewhere learning about child abuse cases

The key departments listed in this policy with their specific roles defined are required to appoint Child Protection focal points for a number of various functions which they have to perform by the virtue of this policy as the duty-bearer for the protection of children. In addition to these formal arrangements, there are other key individuals who come in contact with children and are supposed to have capacities to work with them ensuring their protection. Whether these individuals recognize and are aware of the fact or not, but they form the central social service workforce for child protection which needs to be strengthened.

Recognising the critical role of the workforce, the child protection policy requires all key departments to invest into technical capacity building of their relevant staff. Additionally, the Parent Department and Executing Body of child protection in the province have roles to support the departments in their efforts. Last but not the least, the parent department and executing body should initiate dedicated programs to build the wider capacities in specific child protection areas. Such areas may include but are not limited to:

- i. Communicating with the children
- ii. Child Rights Framework, Child Protection Basic Concepts & Child Safeguarding
- iii. Identifying Signs and Symptoms of Abuse
- iv. Psychosocial First Aid & Early Interventions in Child Protection Cases
- v. Community-based Child Protection Monitoring, Prevention, Reporting & Response
- vi. Case Management
- vii. Child Protection in Emergencies

The key technical areas go beyond the ones mentioned in above list. In order to effectively build capacities, the following few modalities should be adapted; however, more innovative, gender sensitive and cost-effective ways are encouraged:

5.5.1 Mainstreaming Child Protection into Curricula

The relevant departments in collaboration with and technical support from Child Protection Technical Working Group, and Executing Body – should incorporate the key technical

child protection training modules and sessions into their staff's induction and professional trainings. Such training for example is teacher training programs, LHVs' trainings, public service commissioned staff's induction programs, doctors' trainings, law school curriculum, bar council training programs and so on.

5.5.2 On-the-job Mentoring

Respective departments should seek help from Child Protection Parent , Executing Body – and other civil society experts to mentor their relevant front-line staff on areas relevant to child protection. The mentoring arrangements however should be made formal with clearly listed learning objectives, duration of mentoring, defined key deliverables during the mentoring period, formal and semi-formal feedback mechanism and schedule between mentee and mentor, and final reflections from both parties towards end of mentoring period.

5.5.3 Training

Formal trainings should be organized by the Child Protection Parent to build the capacities of the workforce on child protection. In this regard, the parent department and executing body should develop annual capacity building plans and should share them widely with civil society actors, UN and private sector too; primarily to check as to which actors among them can be supported or organized by these actors. Following the annual Schedule of trainings, the parent department and executing body should ensure that all members of the workforce are able to attend at least basic trainings in child protection in each of the districts. Moreover, a database containing the list of people already trained and respective areas should also be maintained in order to strengthen the capacities at more advanced levels and avoid duplication of efforts. Last but not the least, the relevant departments and agencies must not wait for the parent department or executing body and should allocate resources and time to send their staff to such technical trainings in the country, region and globally. The relevant departments can also opt to organize such trainings for their staff themselves by hiring external child protection experts and trainers.

5.5.4 Educating

Verbal and non-verbal communication are main means to educating individuals and thus are widely used across the globe in the education sector. Thus, the parent department and executing body in collaboration with relevant public departments, private sector, civil society and UN agencies should develop educational material on child protection for the workforce. The material can be in the form of hard prints (such as posters, leaflets, brief and so on) and electronic products (such as animations, messages, illustrations, voice messages and so on).

5.5.5 Quality Benchmarking

It is of utmost significance to set the quality benchmarks or minimum standards to gauge required skills, knowledge and capacities of the social services workforce. Child Protection Parent are to consult with key and relevant departments and agencies to develop mutually agreed Minimum Standards for Required Capacities of the Social Services Workforce. The standards should be further backed by guidelines to practice them, methodologies to impart them and respective indicators of measurements. The standards should also be able to help

allocate right level of resources in building the capacities of relevant individuals or groups by categorizing them into different capacity levels. Lower the level of the capacities are, higher the efforts may be required and vice versa.

5.6 Child Protection and Gender-Responsive Budgeting

Allocation of resources for the children's protection is important and at par with other development priorities of the country. The key departments need to allocate dedicated resources for the protection of children and mainstream these as part of their annual budgets.

The child protection focal points to be appointed by the key departments, should ensure that such allocations are made part of their respective annual development and current expenditures.

The Child Protection Oversight Body in collaboration with Parent Department and civil society experts should conduct annual Budget for Children Analyses and make recommendations to respective departments about increase or decrease in budgetary allocations for the coming years. Similarly, the Oversight Body should also track the budgets in order to monitor and report back on actual expenses made against the allocated budgets. Last but not the least, while formulating the recommendations to respective departments, the Oversight Body should consider extending technical backstopping for child-sensitive and gender-responsive budgeting.

5.7 Child Protection Information Management System (CPIMS)

CPIMS is a critical component of the child protection system. An effective and efficient CPIMS is required, that interfaces with other departments directly involved in CP services. A service directory should also be maintained listing various service providers and the type of child protective service they may provide. Data should be protected and kept confidential and monitoring and evaluation framework with clear indicators and targets should be in place for child protection interventions to inform policy, report and assist in evidence-based decision making by providing access to accurate, timely and reliable disaggregated child protection data by gender, age, and disability. This database is required to track children in need of protection longitudinally and geographically to ensure continuity of care and protection, including children in institutional care.

Additionally, data of child protection offenders needs to be maintained and the registry shared with the key stakeholders to ensure that once blacklisted, a person will not be able to be a member, work or hold any position within an establishment or organization involved in the education, care, custody and welfare of minors.

Research and learning should also remain a compulsory part of implementation for better informed policies and programming. Similarly, learning from practices has to be imparted for course correction and improving the policies further.

The CPIMS has to target various specific child protection concerns and/or vulnerable children and needs to track services such as:

- a. Identification, registration and assessment of abuse cases and respective referrals.
- b. Alternative family care (foster care, guardianship, kinship, *kefala*²³).
- c. Family re-integration, reunification.
- d. Tracking and supporting children in conflict with law through the child justice system, legal and rehabilitation processes.
- e. Supervision (with or without court orders), parental bonds, written promise, joint parental agreements; and
- f. Support services (counselling, family support).
- g. Referrals from other departments or NGOs to executing body for child protection (e.g., legal aid, support services).
- h. Referrals from executing body for child protection to other departments or NGOs; and
- i. Court orders made in relation to children's cases, including orders related to placements and adoptions, committal to institutions, supervision.

²³ Kafala is a child protection measure, prevalent in Islamic legal countries, which can be of a formal (involving a competent body) or informal nature. It occurs when a person (*kafil*) voluntarily cares for the specific needs of a **child** deprived of his/her family (*makfoul*).

6 Way Forward

In order to ensure that the Sindh Child Protection Policy is effective in setting the direction on child protection for the province of Sindh, a five-year Provincial Action Plan on Child Protection (with M&E Framework) that is gender sensitive addressing the specific needs of children is required to be agreed upon by all concerned departments. This joint action plan needs to ensure requirements of the systems as a whole.

The Action Plan for 2022-2027 should have the following priority agenda, while the priorities for subsequent actions plans will be set in accordance with the preceding period's performance and the changes in the context.

1. Policy Ratification
2. Confirmation and consensus on the action plan for next five years
3. Review of legislative framework and agenda for improved legal cover for child protection
4. Ensure inter-departmental collaboration and referral mechanism with clear roles and responsibilities of each department/organization to provide protection services
5. Embedding Child Protection into existing curricula of training institutes
6. Human Resource plan and recruitment policy
7. Budget allocation for HR and infrastructure
8. Any other appropriate action.

It is important to develop the action plan with already available guidance (such as INSPIRE), which has also been used for the development of this child protection policy. In 2016, 10 global agencies collaborated to produce *INSPIRE: Seven strategies for ending violence against children*, the first-ever global technical package for preventing and responding to violence against children. The seven strategies of *INSPIRE* focus on:

1. Implementation and enforcement of laws.
2. Norms and values.
3. Safe environments.
4. Parent and caregiver support.
5. Income and economic strengthening.
6. Response and support services; and
7. Education and life skills.

The INSPIRE package is anchored by the recognition in the UNCRC that all children have the right to be free from all forms of violence and sets out evidence that clearly shows that preventing violence against children is critical to ensuring sound neurological development, enhancing early childhood development, interrupting the intergenerational cycle of violence, reducing crime, and laying the foundations for lifelong health, well-being and productivity.

This policy action plan will be reviewed annually, and course corrections will be made accordingly.

Supplementary Provision 1:

Child Safeguarding Supplement

1 Introduction

This supplement as part of Child Protection Policy is aimed at specifying Safeguarding policy and procedures for the protection of children. A child is defined as up to the age of 18. The supplement applies to all government staff (particularly to departments which are enlisted in CP Policy with their roles defined), including staff, community members, apprentices, trustees, volunteers, vendors, freelancers, consultants and anyone associated with children who work within the CP system (formal or informal).

All adults who come into contact with children and in their work have a duty of care to safeguard and promote child welfare. Child protection refers to the activity that is undertaken to protect specific children who are suffering, or are vulnerable and likely to suffer from violence, abuse, neglect and exploitation. Safeguarding children within the child protection domain is defined for the purposes of this policy as:

- Protecting children from maltreatment, abuse, exploitation, violence or neglect
- Preventing impairment of children's health or development
- Ensuring that children are growing up in family-like environment consistent with the provision of safe and effective care
- Taking action to enable all children to have the best life chances

1.1 Safeguarding Commitment

The Government of Sindh is committed to safeguard the welfare of children by protecting them from exploitation, violence, neglect, physical, sexual, or emotional abuse. It is also important for relevant government and non-government departments/agencies working for or with the children, to work within a framework to operate to keep children safe. The below guidelines and provisions direct the institutions towards enhancing a safeguarding culture at institutional level:

- All departments must recruit credible²⁴ Child Safeguarding Officer or designate one of the existing staff members as Child Safeguarding Focal Point to serve as the primary contact in case of any suspicions, reporting, discussions with senior management for constituting potential investigations, plans, delivering trainings, orientations, managing records and any other act planned under this purview.
- Ensure that all staff, apprentices, trustees, consultants, vendors, and volunteers working with children are carefully selected, are checked against any possible criminal backgrounds, have two appropriate references (which should be cross-checked against any

²⁴ Special measures must be taken for background checks of the child safeguarding focal point or child safeguarding officer to ensure that respective potential recruit has a clean background, and has never been engaged in violations of a child's right to protection him-/herself. A general attitude and conduct towards children and understanding of the child protection in addition to safeguarding must be assessed.

potential safeguarding concerns in past) and understand and accept their responsibility for the safety of children and in their care.

- Ensure that protection of the children is of paramount importance, regardless of age, gender, ability, or race, when planning, organising, advising on and delivering programmes.
- Respond swiftly and appropriately to all suspicions or allegations of abuse, and to ensure confidential information is restricted to the appropriate external agencies.
- Raise the awareness of relevant staff, associated organisations and volunteers of child protection issues through the provision of training and regular updates to risk assessments.
- Monitor and review the effectiveness of this policy on a regular basis through a standardized monitoring framework for child protection.

The Child Safeguarding Supplement also seeks to manage effectively the risks associated with activities and events involving children through departments by:

- Completing a risk assessment process which involves identifying risks and mitigation measures to these risks.
- Implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis.
- Ensuring that the appropriate criminal background and reference checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with children.
- Requiring new employees and individuals involved in working with children to familiarise themselves with the content of this policy and the associated code of behaviour and receive appropriate training.

2 Procedure

2.1 Recruitment, Selection & Induction

The aim of the recruitment and selection processes for employees, volunteers, vendors, contractors, freelancers and consultants is to ensure that the best person for a particular role is appointed. In order to protect the best interest of children and to ensure safe environment for them, the following must be practiced and adhered to while completing any recruitment:

- Structured selection procedures i.e., test and/or interview should have specific questions to check and assess the candidates' aptitude, knowledge and skillset towards child safeguarding.
- Reference checks with a particular inclusion of safeguarding related track records, any previous accusations/allegations, any records of previous offences and investigations with respective results; from at least three previous employers in case of experienced professionals and from their college/university professors/lecturers in case of fresh graduates.
- Criminal background checks from respective local police stations should be made to check upon any criminal offences including but not limited to safeguarding related concerns.

The induction of the newly recruited staff members and volunteers should have mandated detailed training on safeguarding procedures, distinguishing appropriate and inappropriate behaviour, code

of conduct, handling/managing potential safeguarding concerns/procedures and any other related procedure.

In case of contractors, vendors and consultants, the respective departments need to organize periodical safeguarding trainings (e.g., twice a year or once in a quarter) for them in the groups. This has to be ensured that no consultant, contractor, or vendor is selected or provide services without having safeguarding procedures and that this supplement is well understood and committed to, as to cause no harm to the children in any regard by signing the code of conduct and safeguarding commitments (in any form that the respective department chooses to make).

2.2 Work with Children

This Safeguarding Supplement will require all those working directly with children (regardless of their parent or associated department) in any situation to follow the procedures below, in order to create a safe environment for children.

2.2.1 Requirements for staff working with children

The word ‘facility’ is used in this section to refer to place of work or a place used by children or a place where children are brought together. A member of the ‘staff’ includes staff, volunteers, vendors, contractors, freelancers, and consultants hired by any of the departments, particularly the ones with their roles defined as part of Child Protection Policy:

1. Staff are required to strictly adhere to issues of workplace safety at all times, especially where children are involved. This includes carrying out risk assessments as required before the use of any facility by the children. Risk must be assessed for children with different age, sex, inclusivity, and varying abilities. If the children are provided with official transportation facility or government contracted transportation facility, safety risk assessment is required.
2. Staff working with children should be:
 - a. qualified, specifically trained and certified in managing children;
 - b. should be trained and certified in risk assessment and mitigation;
 - c. should be certified in providing first aid and para-medical services, such as CPR in case of emergency.
- d. Should have emergency contact list for all students on record and if the event for children is at alternate locations, staff is required to carry the emergency contact list.
3. There should always be at least two adults present at all times with children, or the person working with children should be supervised at all times.
4. No staff member is allowed to take a child or children home.
5. No staff member is allowed to provide a child or children pick-and-drop service without an explicit consent from parents.
6. No individual and/or unauthorized staff member(s) is allowed to enter children accommodation facility. Prior permission is required when such visitation is being planned or undertaken.
7. Staff is required to maintain attendance register for all the children and staff members. Staff attendance should also include recording of sign-in and sign-out time and official signature.

8. Parents should be provided with verified information from NADRA and Police, including prior felony records if any, of the person who is assigned the responsibility to work with children.
9. Parental consent and medical information about the child must be obtained in advance when working directly with children. It is incumbent upon the officer in charge of children or responsible for children, to keep personal information on every child confidential. Divulging information on children can lead to putting children at risk. In case such a situation arises, the person divulging information will be held to account.
10. The respective government department must have a standard consent form on file and an attested copy on e-record to make it available for all the key staff. These forms should be in language understood by parents. If a parent requires translation or an interpreter, signature of the interpreter is required on all official forms.
11. The interpreter, by consenting to perform her/his role, is also responsible and accountable for the well-being of the child.
12. Parents and children at all times, should have contact details of the office or the contact details official designate person whom they can contact in case of emergency.
13. In non-emergency situation, contact information of the office or the designate official should be made available to all parents, be posted at visible places on premises where children are convened, such as schools, playground and so on.
14. Staff should ensure that programmes follow agreed timings and locations.
15. Staff are expected to promote, demonstrate and incorporate the values of fairness, trust and ethical practice – Staff must respect all individuals whatever their age, development stage, ability, sex or ethnicity throughout the session.
16. Staff should behave and dress in a manner that promotes recognised good practice in relation to safeguarding.
17. All residential events should be in healthy environment, and be completely substance (pan, *gatka*, *answer*, alcohol, *chars*), and smoke free inside and outside of the facility.
18. All accidents/incidents involving staff or participants should be recorded using the Department's Incident Reporting Forms immediately. Each department must have Incident Reporting Forms established and available to staff at all times.
19. Staff and volunteers are responsible for familiarising themselves with building/facility safety issues, such as, fire procedures, location of emergency exits, location of emergency telephones and first aid equipment; in instances where the staff and volunteers are to take children to any such infrastructures, this includes school health units, hospitals, police station, and so on.
20. It is critically important for all staff members and anyone in contact with children are responsible to report suspected cases of child abuse – physical, emotional, and sexual to their supervisor and file a written document report or fill out a prescribed form.
 - a. It is the responsibility of all departments to make available such prescribed official forms with unique serial number or set-up an online e-filing system.

2.2.2 Good Practice to protect against allegations of abuse

One must remember the following:

- a. Do not spend excessive amounts of time alone with children away from others.

- b. Do not take a child or children to your own home(s) or a private place where only the adult in question has access to.
- c. Do not offer lift (pick & drop service) to a child unless they have written parental consent even when a second adult is present.
- d. In situations where consent from parents is not immediately possible or the parent is unavailable, any decision that involves a child or children should be with the full knowledge and consent of person in charge, supervisor or a senior executive of the department, agency and/or the children's parents/guardians.
- e. Make sure that a child at any age should not be exposed to or allowed to engage in contact sports or intense physical activity potentially harmful for the child.
- f. Ensure that a child or children are not exposed to or engaged in any kind of sexually provocative conversations and activities. Or are subject to sexually suggestive comments about or to a child as amusement, entertainment or for pleasure.
- g. Do not allow or engage in inappropriate physical contact or touching of any form by an adult or another child.
- h. Do not allow children to use inappropriate and insinuating language.
- i. Listen carefully and record/document any allegation a child makes during a group session or individual conversation.
- j. Encourage children to do things of a personal nature by themselves. If a child is unable to, please inform parents or older sibling, especially in an emergency situation.
- k. Please avoid placing yourself in a situation(s) where you are alone with a child. Always ask for help from your colleague or a co-worker immediately.

2.2.3 Photography and Interviews

Photographs and interviews of children can only be taken or recorded with prior explicit written permission of the parent or legally appointed guardian of the child. All departments in contact with children or working for children is required to have clear policy and rules on this matter and no exceptional provisions are to be made at anyone's request or order.

Commercial use of or pictures of individual or group of children should be strictly prohibited by the departments concerned. In instances of advocacy work by the department, explicit parental consent or of a legal guardian should be made mandatory.

In all such consented photographs, it is recommended to focus on the activity and not the child, where they can be identified readily. Advocacy material should not use names and age of children explicitly.

As it pertains to ensuring a child right's, photographs, and quotes/interviews that identify the person, are classed as personal information and in violation and require protection. This subject is governed by Data Protection & Confidentiality Supplement.

2.2.4 Signs and Types of Abuse

Abuse is the intentional perpetration of one, or a combination of more than one, of the following: physical or psychological violence, exploitation, injury, neglect or negligent treatment, or maltreatment, including sexual abuse.

Children can potentially be abused by family member, a trusted family friend or a person of trust at any institution such as school or a trusted person in the community. In most cases perpetrator is someone who is close to the child and the family.

Some signs that could alert staff to the fact that a child might be being abused include:

- Sudden changes in behaviour
- Unexplained bruising and injuries
- Sexually explicit language and actions
- Something a child has said
- Change observed over a long period of time e.g. losing weight or depression, lack of hygiene, signs of betrayal – lack of trust and interest.

If a child displays these signs, it does not necessarily mean that they are being abused. Similarly, there may not be any signs; you may just feel something is wrong. If any person is worried and concerned about the welfare of the child, as a responsible adult, he/she must report it to the concerned parent or supervisor or someone in authority to take immediate action. Please note, it is not the responsibility of the respective person to decide if it is a case of abuse or neglect, however, he/she is responsible to document and report it to his/her respective supervisor.

This policy recommends that each department appoint focal point for Child Protection, if abuse is suspected, it is important to directly report to departmental focal point as he/she will know exactly what needs to be done next.

Practice that helps in addressing situations of child abuse:

- Make sure you are not alone when addressing the situation.
- Maintain calm to ensure the child is safe and feels safe. Ensure that the child does not feel guilty.
- Take notes of the incident and write up a detailed account of what the child has shared.
- Allow the child to speak without interruption, accept what is being shared, remember child is under trauma.
- Share the process with the child, and what will be the next steps.

1) *If you are concerned that a child is or may be subject to abuse or harm:*

- a) Make a written, dated note of observations.
- b) Follow the protocol and inform the designate Focal point in the department or a superior officer.
- c) Do not take any action unilaterally.

2) *The following outlines the steps you should take if you are concerned that the behaviour of a member of staff or other person is threatening, or potentially threatening well-being of a child.*

- a) If you are concerned that a member of staff is harming or abusing a child, you must report your concerns immediately to Focal point or a superior officer. You can directly contact child protection helpline or District Child Protection Unit as appropriate.

2.2.5 Making a Referral

If you are concerned that a child, may be at risk or has disclosed that they are being harmed, you should contact your superior officer, department's executive or desk officer (for case management or a Child Protection Officer) /Focal Point. Your superior officer, department's executive or desk officer (for case management or a Child Protection Officer) /Focal Point will assess the concerns and refer to the focal child protection agency or agency's child protection officer. Once reported, the child protection focal agency/department will conduct their own investigation/assessment. Anonymity may not be maintained on reporting in that case.

2.3 **Radicalization & Extremism**

The threat from terrorism and extremism is real and severe; and can involve the exploitation of vulnerable children. This can include involving them in extremist activity. There has also been an increase in far-right views and sentiments that children are exposed to, including violence, access to online web-based content, and media's portrayal of violence.

Departmental staff, working directly with children must take note and be aware of such expression or behaviour demonstrated by a child. Follow the protocol and report your observations formally. Children are susceptible to extreme views when probed. All concerned departments, mentioned in this policy should provide mandatory training to their staff members on this subject and especially on how to detect extreme views. Education department and *Wafaq-ul-Madaris* need to play active role in this case.

Supplementary Provision 2:

3 Data Protection & Confidentiality Supplement

One of the components of the 2018 Digital Pakistan Policy by the Ministry of IT is the “promulgation of necessary policy frameworks, laws and rules to enable creation of a sustainable IT environment, including [the] enactment of data protection law that covers,” amongst other things, the “protection of personal data and online privacy for improved transparency and security of sensitive and confidential information through appropriate Data Protection law.” To implement this, in April 2020, the Ministry of Information Technology and Telecommunication released a consultation draft of the Pakistan Personal Data Protection Bill, 2020. After the consultation stage, the draft bill is to be presented to Parliament for debate and passage. Although, the bill still awaits enactment, the data on children is being collected, processed and analysed for multiple purposes by the relevant governmental and non-governmental institutions. There are, however, policies at the regional and national level which emphasize the importance of protecting citizens’ personal data.

Where, the data is key towards making informed and effective decisions in the best interest of children, risk of improper use, mala fide intentions and being in the wrong hands can lead to disastrous outcomes for the children as individuals and groups.

It is critically important for all actors (see 5.3.5) working for children’s protection and particularly if they are intentionally or un-intentionally gathering and/or storing any kind of data related to children; to have Data Protection and Confidentiality procedures and protocols in place. The Supplementary Data Protection & Confidentiality Policy to the Child Protection Policy provides an overarching guideline with an associated responsibility to abide by the provisions made herein and accordingly the respective institutions to be held to account in cases/instances of non-compliance. This is worth noting that provisions in this supplement are to be applied on the organizations/departments which are working with or for children.

The Government-commissioned CPIMS and its associative organizations are responsible for protecting the personal and professional data of all the individuals undertaking the processing of child protection cases. This includes but is not limited to; government operatives, subsequent operative agencies and all authorized data processors; case subjects, their guardians, supporters and case workers; the accused persons/institutions and their personal information. The legal and ethical considerations in the case of child protection involve collaboration between different provincial and inter-provincial departments, which in turn means the sharing of classified information between them. This document highlights the consolidated policy of data protection as outlined by the CPIMS terms of use.

3.1 Purpose

With the provisions made for Children’s Data Protection & Confidentiality, this is anticipated that potential risks to children and families will be mitigated through the protection of personal data in all forms.

The overall purpose of this supplement is to provide guidance for storing, sharing, archiving, and destroying information related to children and families linked to any kind of child protection services.

The approach contained is guided by international standards and follows the Guiding Principles of the best interests of the child, the principles of ‘do no harm’, and best practices for confidentiality, all of which require that information is only shared on a ‘need to know’ basis.

3.2 General Principles

1. General Principles and Key Provisions in this policy present minimum actions to be complied by any and every institution, organization, department and/or agency in Sindh; if and when they collect, store, process, analyse, disseminate and/or produce any data about children. The respective institutions must make best efforts to align their own data protection and confidentiality protocols and procedures with this policy, as further detailed.
2. All institutions, departments, organizations and/or agencies whether government or non-governmental who by any means intentional or unintentional, directly, or indirectly collect and store (whether digital, online, or manually in the books) must have their own Data Protection and Confidentiality Protocols with the following two provisions which must be complied with:
 - 2.1. Appointment of at least a 17 Grade or equivalent scale of Data Protection Officer with strong relevant academic background and experience of managing and protecting data in all forms. The department must ensure that the appointed individual receives complete and thorough training in the as per the consolidated training manual.
 - 2.2. Constitute a departmental Executive Data Protection Body (comprising 3-5 most senior staff members) who oversee the compliance to Data Protection and Confidentiality Procedures and Protocols framed in respective institutional provisions as a measure of compliance to this policy, monitor the non-compliance instances and manage/respond to the breaches.
3. Unless, the respective institutions have established their own data protection protocols and procedures, they must comply with the provisions made in this Supplement. Similarly, as and when they establish their own protocols and procedures, they are to be in-line with the overall guidelines provided in this supplement.
4. The best interests of the child, including considerations of physical safety, social and emotional wellbeing is the primary consideration in decision-making on data protection and information sharing.
5. Access to Personal Data should be limited only to those who need to know for the purpose of providing services and assistance to the child/children. Personal Data should only be known to the relevant on-the-service staff, caseworker, supervisor, and other service providers (e.g., referral agencies) for the purpose of providing services and assistance to the child/children.
6. The way information is shared depends primarily on; i) the purpose and need for sharing of such information, ii) the type of information being shared, and iii) the level of sensitivity of the information. The level of sensitivity may include but is not limited to the information related to an incident of gender-based violence, sexual violence, abduction and trafficking or related to a recovered child from organized criminal gang. The Executive Data Protection Body shall establish the level of sensitivity on case-to-case basis considering best interest of the child. The only exception will be that the information is required by

law of the land; in which case, the requester will have to follow legal process to acquire the information.

3.3 Key Provisions

3.3.1 Assent/Informed Consent

1. When obtaining informed consent/assent, an explanation must be given to the child and their parent/caregiver where appropriate, on exactly why Personal Data is being gathered, how it will be used and by whom, as well as the limits on confidentiality (i.e. where serious safety concerns are identified and/or mandatory reporting requirements).
2. Information should be shared sensitively in language and formats appropriate to the child's age and capacity to understand, and the child (and parent/ caregiver) should be given opportunities to ask questions.
3. Children should be given the opportunity to highlight any information that they do not want disclosed to any particular person or agency. For example, they may not want their family to be told personal details about them that they would rather communicate face-to-face.
4. Children/caregivers have the right to access and review information held about them. Agencies holding information should therefore make provisions for them to be able to access their information as and when they need to do so.
5. In exceptional circumstances, information disclosed by children can be shared against their wishes if it is considered – after careful evaluation, in their best interests to do so, usually if the child or another person is at risk of being harmed or if sharing the data is determined to be in the child's best interests. In such situations, the reasons for sharing Personal Data in such a manner must be clearly explained to the affected child. There is no hard or fast rule for disclosing information shared by a child. Because this is subjective, each case should be considered individually, and decisions to disclose information should be taken at the highest level of the agency or agencies involved.
6. Mandatory reporting requires service providers to report cases of actual or suspected abuse to a central agency, limiting confidentiality between agencies and their clients. Mandatory reporting should be explained to the child (and/ or caregiver) during the informed consent process. Service providers should consider the child's safety and best interests along with the potential legal implications of not reporting to determine the appropriate next steps. Decisions regarding compliance with mandatory reporting laws should be taken at the highest level of the agency involved.

3.3.2 Data Protection/Storage

3.3.2.1 *Protecting Data Stored in Paper (Hard Copy) Forms and Files*

1. Information collected on children must be coded for the purpose of anonymity and for tracking purposes.
2. The code should be used to refer to the child verbally, on paper, and electronically (including in word documents, emails, online conversations, etc.), instead of referring to a child by his/her name.
3. Each case and all related forms and paperwork should be stored in an individual file, clearly labelled with individual code on the outside of the file. It is imperative that the child's name does not appear on the outside of the file. Files should be stored according to the allocated code.

4. Paper files should be kept in a secure place, accessible only to the relevant staff members responsible for the information. This requires a secure location and filing cabinet with lock, with access to these records only with the designated person.
5. Reports received through helplines need to be kept confidential including clear disciplinary measures against any breaches through the helpline operators.
6. Where feasible, rooms containing paper or electronic information should be kept securely locked when the person responsible for the information leaves the room. Where this is not feasible, a lockable filing cabinet is sufficient.
7. Paper files should be transferred by hand between only the people responsible for the information. During transit and transfer, the files should be stored in a locked/sealed box or sealed envelope.
8. Do not keep original documents such as ID cards or medical reports. Instead, original documents must either be photographed or scanned and returned to the child/family. Original documents should not be stored in paper files so that destruction of paper files can be done without any hesitation in the event of an emergency evacuation/relocation.
9. Printing, photocopying or scanning of data related to children should be done in-house. Any extra copies of forms should be fully destroyed using an electronic shredder so that they are illegible and disposed of confidentially.

3.3.3 Protecting Data Stored in Electronic (Soft Copy) Forms and Files

1. Smartphones, tablets, laptops, and desktops (hereafter computers) themselves must be password protected and participating agencies and authorities will ensure that each individual member of staff has his or her own login and own passwords.
2. In addition to the computer, all electronic files (e.g. Word, Excel) must be password protected. If emailing a document containing child protection data, the password should be emailed separately. Staff must ensure that emails are only sent to the intended recipient with no one else in copy. Besides that, no information will be shared in email text.
3. Strong passwords should be used. Passwords for documents and computers must be changed on a regular basis (minimum every 3 months) or when an authorized user leaves their current position.
4. Staff must lock their computer when away from it. Computers should also be set to automatically lock if the user is away from the machine. Only work-assigned computers should be used for managing information related to child protection. The computers hosting data on children should only be accessed by authorized personnel and should be used exclusively for that purpose.
5. Computers should be equipped with up-to-date anti-virus software so as to avoid corruption and loss of information.
6. When a member of staff leaves their current role or job, they must hand over all child protection related information. Any Personal Data saved on the computer must be erased before handover.
7. Memory sticks (USBs) must not be used.

3.4 Data Breaches

1. In case of a breach²⁵, a representative (depending on organizational hierarchy and policies) of the affected department/agency, will notify the child protection executing body within 24 hours of becoming aware of the Personal Data breach either by themselves or one of the associated departments/ organizations. Immediate action will be taken if the Personal Data breach is likely to result in harm to a child or an adult.
2. The child protection body's (oversight body, parent department or executing body) representative will set-up the meeting with respective agency/department and agree on a remedial plan of action to ensure the immediate safety of the data subjects within 24 hours. The plan may include but not limited to reporting the issue to and seek assistance from appropriate Law Enforcement Agency such as Special Cybercrime Unit (Sindh Police). The longer-term solution and respective implementation plan for the prevention of such breaches in future need to be identified and agreed upon within 14 days.

3.5 Sharing Personal Data

1. Any data that is related to an individual's personal life including personal identity, addresses, contact details, health conditions, education status, job status, sources of income, and all other such types of information which generally are at the disposal of any individual if to share with anyone or not; is defined as Personal Data within the scope of this supplement and overall Child Protection Policy.
2. The rationale for sharing Personal Data with an agency receiving a referral is to enable the provision of holistic, multi-sector services as needed based on the best interests of the individual child or family. However, Personal Data shared must be limited to only the information necessary for the referral agency to provide that service effectively.
3. The person receiving the information should be the direct service provider, such as another caseworker, psychologist, doctor, lawyer.
4. Before proceeding to make the referral, it needs to be checked if the receiving agency is available and/or has the capacity to take on this case, for this purpose anonymous information should be provided first. Never provide Personal Data if the referral agency is not capable of receiving and helping the referred person.
5. In the event where more than one Child Protection authorities or agencies are involved in providing services, it must be agreed which agency and caseworker will lead the case, based on the primary protection concerns of the affected child. Case management guidelines and SOPs covering all such aspects need to be established and disseminated to all partners.
6. Information should be shared strictly on a need-to-know basis. Information can only be shared after taking the express permission (written and informed consent which needs to be kept in the safe custody for future reference) from the child and parents/caregiver where possible and after risks of sharing the information have been explained to the beneficiary.

²⁵ Personal data breaches can include access by an unauthorised third party; deliberate or accidental action (or inaction) by a controller or processor; sending personal/confidential data to an incorrect recipient; computing devices containing personal data being lost or stolen; alteration of personal data without permission; and loss of availability of personal/confidential data.

Information should not be shared if it is likely to result in harm, e.g. forced marriage or criminal indictment of a sexual violence survivor.

3.6 Archiving and Destruction of Personal Data Related to Child Protection Case Management

When a child has been provided with required assistance or services; or a child protection case is closed, the hard copy and electronic copy is to be archived at a secure location for a duration of 7 years. After that period, the record must be destroyed. However, a summary analysis or case studies while ensuring NO DISCLOSURE of any PERSONAL IDENTIFICATION DATA should be maintained to study the trends, devised incidence rates, establish comparisons, and for learning purposes.

The department and agencies' Data Protection & Confidentiality Protocols & Procedures should include the evacuation/relocation plan in the event of an emergency such as flooding or other natural disaster. The evacuation/relocation plan should contain distinguished physical space to shift equipment and records. Moreover, the plan should also contain data backup frequency and locations. The data backup in any case has to be made at central servers present at safe and secured locations and servers. Cloud services wherever possible should be availed for efficient and regular backups, where possible.

That plan must include a scheme of delegation explaining who is responsible for removing and, if necessary, destroying hard and soft file copies. This may require destruction of assets and burning of papers. This plan should be incorporated into the standard evacuation/relocation plan for the respective authority or agency, but the sensitive nature of children's data must be highlighted to all relevant staff including senior executives and security focal points.

Annexure A: Selective Legislations for Children in Sindh

Sr. no.	Title of Legislation	Year	Purpose
1	The Sindh Child Protection Authority Act	2011 (Amended 2021)	Deals with coordination and monitoring of child protection-related issues, where a child is defined as 18 years old.
2	The Sindh Prohibition of Employment of Children Act	2017	Prohibits any child from working where child is defined as any person below the age of 14.
3	Sindh Empowerment of Persons with Disabilities Act	2018	Government of Sindh passed Sindh Empowerment of Persons with Disabilities Act 2018 on 23rd May 2018 in line with Convention on the Rights of Persons with Disabilities (CRPD)
5	The Sindh Right of Children to Free & Compulsory Education Act	2013	The Act Declares all children between the ages of five and sixteen, residing in the Sindh province, eligible for free and compulsory education.
6	The Sindh <i>Dar ul Atfal</i> (Supervision & Control) Rules	1987	Defines rules to run <i>Dar Ul Atfal</i> (a residential institution for the care and education of orphans)
7	The Sindh Orphanages (Supervision & Control) Act	1976	Defines rules to establish and run Orphanages. Amendment Ordinance passed in 1984.
8	Anti-beggary law (Section 7 of the West Pakistan Vagrancy Ordinance 1958)	1958	Bans beggary overall whereas defines the child as a person under 14 years of age