



**HR POLICY**

**POLICY NAME: SAFEGUARDING POLICY**

**REFERENCE No.: HR/CC Global/SG/05/2025**

**POLICY VERSION: HR/SG/002**

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## 1. Introduction

### 1.1 Definition

For CottonConnect, **safeguarding** means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse, and neglect. Safeguarding describes the broader preventive and precautionary approach to planning and procedures that are necessary to be in place to protect children, women, and vulnerable adults.

### 1.2 Purpose

This safeguarding policy is to ensure that CottonConnect's staff, operations, and programmes do not harm children and vulnerable adults, including women, associated with CottonConnect, in any way. It includes protection from any form of exploitation, bullying, harassment, health, or safety hazard as it applies to people that CottonConnect works within farming communities.

This policy works on the principle that all the parties mentioned under 1.3 below will follow the **5Rs of safeguarding** namely Recognize, Respond, Report, Record and Refer whilst engaged in CottonConnect's business. To mention briefly:

1. **Recognize:** (Everyone) Recognizing the signs of abuse, exploitation, and neglect will lead to understanding the situation and analyzing the presence of safeguarding concerns.
2. **Respond:** (Everyone) If it is established that there is a safeguarding concern, then it becomes one's responsibility to respond appropriately, as mentioned in this policy document.
3. **Report:** (Everyone) Such concerns should then be reported to the designated safeguarding officer/senior manager in a confidential manner.
4. **Record:** (Safeguarding Officer) Accurate details should be noted for record-keeping, for decision making, and for referencing.
5. **Refer:** (Safeguarding Officer) Once the Safeguarding Officer has enough information, s/he will decide on what action to take i.e., whether to monitor and record the concern or to refer it on. Only the designated person should be making referrals outside the organization, if necessary, after discussions with the CEO or local leadership teams.

### 1.3 Scope

This policy applies to but is not limited to permanent or temporary staff, external service providers/contractors, researchers, consultants, volunteers, and members of the organization's governing bodies/representatives of CottonConnect.

## 2. Safeguarding Policy and Measures

The policy will approach safeguarding practices and Decent Work aspects that, when not followed pose a threat to the well-being of children, women, or at-risk adults in the cotton supply chain.

The policy will deal with the Prohibition of Child Labour as mentioned under the ILO Convention 138 and CottonConnect's policy statement. No child under the age of 15 will be employed in offices, ginning units, or the fields associated with CottonConnect. Member farmers will ensure that working does not jeopardize schooling, health, safety, and the social, moral, or physical development of workers under the age of 18 (ILO Convention 182). No hazardous work will be given to workers below the age of 18 years. All



possible measures and programmes will be undertaken by CottonConnect and its partners to safeguard the children of farmers and workers, enroll them in schools, and spread awareness on good health and hygiene practices by engaging children creatively.

The policy prohibits any type of forced and compulsory labour as defined in ILO Conventions 29 and 105, including bonded labour and slavery.

CottonConnect and its associates shall ensure that field workers are aware of their rights and duties, responsibilities, salaries, and work schedules and are not exploited physically or financially because of these aspects. It will also endeavor to ensure that no form of discrimination (as per ILO Convention 111) is followed at any stage in recruitment, remuneration, access to training, promotion, disciplinary measures, termination, or retirement.

The policy will also deal with concerns related to Freedom of Association (ILO 87) and Collective Bargaining (ILO 98) aspects. All the workers in CottonConnect farmers' fields shall be allowed to form or join a union of their choice.

All the stakeholders shall ensure a healthy and safe workplace for their employees. CottonConnect will assist member farmers to provide Occupational Safety for their workers. They will provide potable water, protective equipment, and first-aid services. Working conditions at ginning units and fields shall regularly be monitored to identify potential health and safety risks at work and appropriate measures shall be taken to avoid them.

Entrepreneurial groups and Farmer Business Schools have been established and developed to safeguard the more vulnerable adult groups in cotton supply chains, the farmer, field workers, and women.

CottonConnect and its associates (as mentioned in 1.3 above) will abide by the Code of Conduct mentioned in this policy and all new staff joining CottonConnect or its local partners will be trained on the policy and refresher training will be conducted every two years.

### **3. Code of Conduct**

#### **3.1 For All Stakeholders**

##### **It is prohibited to:**

1. Engage in child labour i.e., keeping any individual under the age of 15 for work in fields or otherwise and acting in a way that may place a child or an adult at risk of abuse, including not undertaking a proper risk assessment before implementing activities or events.
2. Engage young adults (under the age of 18) and pregnant women in any form of hazardous work in the fields or otherwise.
3. Support discrimination on the basis of race, religion, national origin, caste, color, sex, age, sexual orientation, or disability.



4. Engage in any form of forced or bonded labour. This also applies to forced or bonded labour work conditions for the sharecroppers staying on farms. There will be no forced or bonded labour on farms.
5. Engage in any sexual or inappropriate activity with a child regardless of the age of majority or age of consent locally, or with a woman, at-risk adult, or with beneficiaries.
6. Make the working environment uncomfortable, in any form, for women and vulnerable adults.

### **3.2 For CottonConnect and its Staff**

1. CottonConnect activities and operations shall be carried out in strict compliance with the highest legal and ethical standards. All interactions with customers, suppliers, and project partners shall be fair, honest, and strictly compliant with contractual undertakings and applicable laws and regulations.
2. All individuals associated with CottonConnect must respect the customs and traditions of the areas in which they work unless to do so would bring them into conflict with the provisions of the safeguarding policy and code of conduct.
3. Anyone with suspicions or concerns of a safeguarding nature should speak up as soon as possible to their line manager or safeguarding officer or any other designated staff member or use the Grievance and Complaints helpline.
4. CottonConnect will ensure all staff and other stakeholders have access to, are trained on, and know their responsibilities within this policy, and sign up to this policy or any other declaration in line with this policy.
5. All programmes and activities will be designed and undertaken in a way that will protect people from any risk of harm that may arise from their coming into contact with CottonConnect, either in person or through its digital channels.
6. CottonConnect will ensure that all staff receives regular training on safeguarding.
7. CottonConnect will follow up on reports of safeguarding concerns promptly, according to due process and through the channels created by the implementation of this policy.
8. All staff members will report any act or suspected act of breach in safeguarding or decent working conditions for farmers, workers, and all the vulnerable adults, so that appropriate measures may be taken.

### **3.3 For Local Partners**

1. Local Partners will have a regularly updated, written Safeguarding Policy consistent with CottonConnect's Safeguarding Policy.
2. Local Partners will train its employees, engaged farmers, workers, and any other related vendors on Decent Work aspects including safeguarding concerns, not limited to but including the issues mentioned in this policy.
3. Local Partners will ensure the appointment of a designated safeguarding officer and keep her/him informed about the latest laws governing safeguarding concerns.



4. It is the duty of the Local Partner to keep CottonConnect informed about any safeguarding/ Decent work related concerns in its offices or the fields.
5. Local Partners will put up safeguarding IEC material with contact details of safeguarding officers in all its offices.
6. Local Partners will also make the necessary arrangements in the identification of issues related to child labour, forced labour, bonded labour, and other issues related to Decent Work at farmer/ farm labourers level in the CottonConnect Farmers Training Programme area. Local Partners will conduct necessary awareness programmes and regularly share the necessary information with CottonConnect on issues observed on safeguarding policy in the programme area.

### **3.4 For Suppliers and Vendors**

1. Suppliers and vendors are required to have safeguarding arrangements in place which meet or exceed CottonConnect's standards.
2. They shall agree to CottonConnect's Safeguarding Policy evidenced through the Service Level Agreement, which may include safeguarding arrangements.
3. They shall be open to regular quality systems audits carried out by CottonConnect.
4. They will carry out safeguarding aspects related inquiries timely and efficiently, and up to the satisfaction of the complainant.

### **3.5 For Farmers**

1. All farmers associated with CottonConnect through its programmes or otherwise will abide by this policy and follow each and every provision of this policy in their implementation activities.
2. Farmers will not involve children below the age of 15 in any form in their fields and have to abide by CottonConnect's zero-tolerance policy towards child labour.
3. Before assigning labour work, farmers will check with all the labourers about the age and education of their children. They should be aware of the provisions of the Right to Education Act and should take action to enroll children between the age of 6-15 years in a school.
4. Farmers will make efforts to disseminate information on Decent work-related aspects to other farmers/villagers/farm labourers.
5. If any child labour is used on their fellow farmer's farms, the farmer will bring it to the attention of her/his field executive/project coordinator/lead farmer/other members of farmers group. If needed, the farmer will coordinate with local school staff for enrollment of the child at risk.
6. Farmers will not give any hazardous work like pesticide application, cotton picking, application of fertilisers, and handling of agri-equipment to a person below 18 years.
7. Farmers will provide fair wages to all labourers and will not practice gender discrimination. Further, no farmer will tolerate the use of corporal punishment, mental or physical coercion, sexual or other harassment, or physical or verbal abuse of any kind.
8. Farmers will not allow forced/bonded labour at any stage and all workers at farmers' fields will be free to join organizations of their choosing and bargain collectively. Farmers will take necessary



care of families of sharecroppers who live on their farms. Farmers will be responsible for the well-being and safety of the families of the sharecroppers.

9. Farmers will provide potable drinking water, places to rest, and regular breaks to workers. They will take care of health and safety measures like appropriate PPEs for the workers while engaging them in their fields.
10. Every farmer will sign a declaration of decent work stating all the above before associating with CottonConnect's programmes.

#### **4. Reporting**

CottonConnect expects its staff, consultants, volunteers, partners, and others associated to be in a unique position to discern whether a child, woman or vulnerable adult is a victim of Safeguarding concerns. The issues that need to be reported could be child labour, physical abuse, psychological abuse, financial exploitation, sexual harassment, eve-teasing, discrimination based on the type of work, wages, violence, bullying, child marriage, health, hygiene, and safety-related, or any other safeguarding concern.

CottonConnect will take all complaints that are raised and will handle them in a consistent, timely, and fair manner. It will deal with all complaints confidentially and all those involved will be expected to keep their involvement and all details relating to the complaint confidential but well documented.

Employees, local partners, vendors, or individuals who wish to report cases of safeguarding concerns will have their case considered by any one of the two designated Safeguarding Officers of the company, at all points in the process. During any meetings that take place as part of this policy, the complainant may be accompanied by an appropriate representative if they wish.

#### **Procedure:**

- Anyone receiving a report or information on a safeguarding allegation, suspicion, incident, or concern must notify the designated Safeguarding Officer (or senior manager) immediately or within 24 hours (or as soon as reasonably possible). The report should be recorded appropriately.
- Any urgent attention required should be provided to parties involved in an incident (e.g., where a child or adult has been harmed) such as medical attention or immediate protection from further harm.
- The report will be assessed and decisions will be made on the nature of safeguarding concern, its seriousness, the need to inform/involve others next steps, etc. In no case will the time taken to make a decision on the complaint be more than two months.
- The Safeguarding Officer will examine if and how aftercare should be provided to the complainant and, if relevant, the accused.

### **Breach of Code of Conduct**

- Individuals or parties who fail to comply with the terms of the Safeguarding Code of Conduct will be subject to disciplinary action and may incur sanctions (consistent with the laws and regulations of the country) that could include contract termination, dismissal and/or exclusion from any further involvement in CottonConnect activities.
- Some cases may require CottonConnect to refer or report serious incidents to external agencies, such as local bodies, law enforcement or other statutory authorities, regulators, or professional bodies.

### **Confidentiality and Non-retaliation Clause:**

CottonConnect will take appropriate steps to ensure there is no retaliation against an employee who raises a complaint.

- It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.
- If there is a possibility of follow-up in a case, a confidential and in-depth investigation will be carried out. The issues should be addressed to the Safeguarding Officer.

## **5. Roles and Responsibilities**

**CEO/Global Head HR** will:

- Lead the development of the policy and approval from CottonConnect Board of Directors.
- Assign appropriate team members to look into all investigations.
- Undertake annual reviews and updates of the policy document.
- Supported by the HR team, keep detailed records of all staff safeguarding training and issue reminders when updates are required.

Her/his contact details will be provided along with the Local Partner's Safeguarding Officer (wherever applicable) on all the IEC and training material for any case related to the safeguarding of children, women, and at risk adults

On the matters which are related to breach of the policy and need decision making, appropriate team members and experts will review in order to make unbiased and fair decisions.

**Project managers** ensure that project partners and project beneficiaries have the opportunity to get exposure to this policy and have the basic ability to report a complaint to the right person when needed.



At any time, if a direct complaint comes from the fields and is addressed to the Safeguarding Officer or any officer higher up, the local partner/CottonConnect Manager should not create pressure or an uneasy environment for the victim for approaching directly to the higher level.

**In case of any concern or complaint kindly contact [safeguarding@cottonconnect.org](mailto:safeguarding@cottonconnect.org).**

The concerns can be directly raised with one of the following **Safeguarding Officers for CottonConnect and the CottonConnect Foundation (India only) are:**

- Ms. Tanya Khurana: +91 9873355120  
[tanya.khurana@cottonconnect.org](mailto:tanya.khurana@cottonconnect.org)
- Ms. Veena Thakur: +91 9958005154  
[veena.thakur@cottonconnectfarmercommunityfoundation.org](mailto:veena.thakur@cottonconnectfarmercommunityfoundation.org)

### **Supporting Documents**

- Reporting Format
- Relevant National and International Laws
- CottonConnect's related policies
- Definitions
- List of Local NGOs/bodies working on relevant Safeguarding and Decent Work aspects to be added