

THE CONCERNED FOR Working Children

Recommendations Towards The National Child Protection Policy Draft

The Concerned for Working Children (CWC)

We at The Concerned for Working Children (CWC) welcome the initiative of drafting the National Child Protection Policy by the Ministry of the Women and Child Development, Government of India. This is a progressive move by the Government of India, a signatory to the United Nations Convention on the Rights of the Child (UNCRC), towards demonstrating its commitment to upholding children's rights.

However, the policy draft requires a progressive shift on several fronts. In keeping with this, following are our recommendations **from a child rights perspective**.

- The policy draft, in its current spirit is not placed in the child rights framework – i.e it does not uphold children's basic rights to their entitlements. In order to actualise the same, transparent and efficient structures have to be put in place, so that children in all situations:
 - Can access their rights
 - Are able to voice their perceived and actual needs
 - Can voice, without fear, when they feel uncomfortable or violated.
 - Have genuine and effective representation to address violations
- Further systemic processes have to be clearly laid out, namely:
- Clear lines of accountability ,
 - Clear lines of redressal in case of violations.

Problems in the current draft:

- The Draft National Child Protection Policy has been formulated more in the paradigm of setting limited guidelines and expectations from duty bearers, rather than establishing a framework in which all aspects of children's protection are addressed. Rather than reading as a to-do document, the policy must firstly layout the Vision , Mission and the Guiding Principles, which will become the base to define and encapsulate child protection and will be the framework to design context specific and efficient guidelines for implementation
- There is no evidence of either children being consulted, or other stakeholders and representatives being looped into the process. The Policy would greatly benefit from the insights and inputs of the constituencies it deems to protect.
- There is no reference and convergence with other policies and instruments in existence. The current policy framing initiative should benefit from the process and outcome of the Karnataka State Child Protection Policy-KSCPP (The Concerned for Working Children being on the core drafting

CENTRAL ADMIN.

THE CENTRE FOR APPLIED RESEARCH AND DOCUMENTATION (CARD)

ANKUR (URBAN PROGRAMME)
303/2, L.B. Shastri Nagar, Vimanapura Post,
Bangalore - 560 017. INDIA.
Tel. : +91-80-25234611 / 25234258
Fax : +91-80-25235034

DEVELOPMENT CELL

437/3, L.B. Shastri Nagar, Vimanapura Post
Bangalore - 560 017 . INDIA
Tel. : + 91 -80-25234270 / 271 / 272
Fax : + 91 -80-25235034

www.concernedforworkingchildren.org
Email : cwc@pobox.com

GRAMASHRAMA (RURAL PROGRAMME)

Nammabhoomi (Training Centre)
Kanyana Post, Hattiangadi Cross,
Kundapura - 576 230
Tel : + 91-8254-264206 / 264210 / 264216

committee). The KSCPP has incorporated the participation of children from various socio-economic backgrounds, affiliations and abilities, including children with special needs in the process of formulation itself. Similar processes of participation and inclusivity must be ensured, when formulating the national policy document too.

Thus CWC proposes the following structure for the National Child Protection Policy that has been drawn out from the progressive Karnataka State Child Protection Policy¹:

1.1 THE VISION

Every child in India will grow in a safe, protected and enabling environment, that fosters positive all round development of the child and creates opportunities for every child to reach her/his potential. An environment where all stakeholders of the Nation, including parents, care providers and the community including public and private, duty bearers and institutions, work in partnership to make children's rights a reality by eliminating discrimination, bringing respect in its interactions with children, valuing children's opinions and participation, and upholding dignity of the child.

The National State Child Protection Policy is a comprehensive framework policy for child protection based on principles of child governance.

1.2 POLICY STATEMENT

The Government of India recognises the inalienable right of every child in the nation (a citizen of India or a foreign national) to protection and safety from all forms of abuse, neglect and exploitation

AND

is committed to ensuring that this right is respected, promoted and protected so as to enable children to live a life of dignity and to develop to their fullest potential in an environment that fosters child participation.

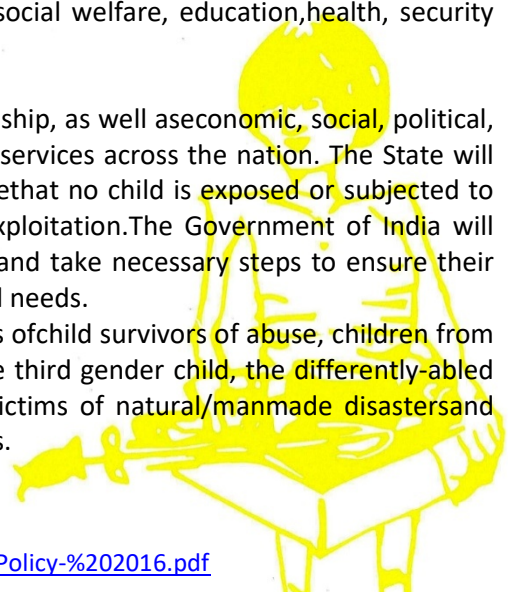
1.3 THE MISSION

The Government of India is committed to ensuring child protection within the nation, based on a rights-based approach, which implies promoting the safety and security of children within the framework of their legally recognized rights including children's right to participation. Children in the nation must have access to protection at all times, from all forms of violence, abuse, neglect & exploitation; and access to child protection services across all social sectors – especially social welfare, education, health, security and justice.

The National Child Protection Policy cuts across gender, citizenship, as well as economic, social, political, cultural or geographical differences to deliver child protection services across the nation. The State will implement both preventive and corrective measures to ensure that no child is exposed or subjected to any form of physical or mental violence, abuse, neglect or exploitation. The Government of India will protect the legal rights of all children throughout the nation and take necessary steps to ensure their safety, including meeting their physical, psychological and social needs.

The Government of India will take particular note of the needs of child survivors of abuse, children from marginalized, and vulnerable sections such as the girl child, the third gender child, the differently-abled child, the special needs child, the homeless child, the child victims of natural/manmade disasters and conflicts and children living with or affected by chronic diseases.

¹<http://dwcd.kar.nic.in:8080/Documents/Children%20Protection%20Policy-%202016.pdf>



The Government of India will create an environment where children's views are heard (with due regard to the age and maturity of the child) and will create spaces for communication based on mutual respect between adults and children.

The Government of India is therefore committed to legal and policy reform, capacity development, planning and implementation, budgeting, monitoring and creating information systems for child safety & protection.

Through this National Child Protection Policy, the Government of India, shall take necessary measures to:

- Address the existing gaps in the current child protection systems
- Provide for institutional and infrastructural support through transparent and effective child sensitive governance
- Promote and strengthen interdepartmental, interagency and multi-sectorial convergence and networking

1.4 THE PARTNERSHIP PRINCIPLE

Sustainable child protection requires commitment to the concept of a protective environment for children by all stakeholders connected to the child. This requires collaboration between government departments, elected representatives and concerned non-state actors, including the children themselves, all acting in the best interest of the child.

The National Child Protection Policy provides a comprehensive framework to guide stakeholder responsibility by defining roles and responsibilities, strengthening institutional and infrastructural support and increasing both access and range of child protection services provided by the Government of India.

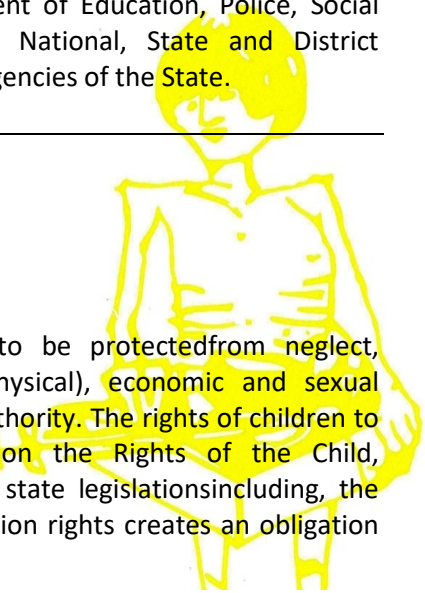
The partnership principle of the National Child Protection Policy is built on creating horizontal linkages between various concerned State departments and vertical linkages at the central, district and panchayat, village/municipality levels and cross linkages with the wider society. The local institutions, i.e., the panchayat and municipal bodies shall be actively involved in the process through Gramasabhas, Ward sabhas especially the Makkal Grama/Ward sabhas, all the while recognizing children as individuals with inalienable rights.

The National Child Protection Policy will be notified by the Ministry of Women and Child Development, Government of India and adopted and implemented by the Department of Education, Police, Social Welfare, Rural and Panchayat Raj, Backward Class and Minorities, National, State and District Administration in collaboration with other applicable departments and agencies of the State.

CHAPTER 2: CHILD PROTECTION

2.1 UNDERSTANDING CHILD PROTECTION

Child protection refers to the fundamental right of every child to be protected from neglect, discrimination, violence (verbal and physical), abuse (mental and physical), economic and sexual exploitation while in the care of any individual, institution, system, or authority. The rights of children to such protection is recognised by the United Nations Convention on the Rights of the Child, 1989 ("UNCRC"), the Constitution of India and numerous central and state legislations including, the National Policy for Children 2013. These legally recognised child protection rights create an obligation



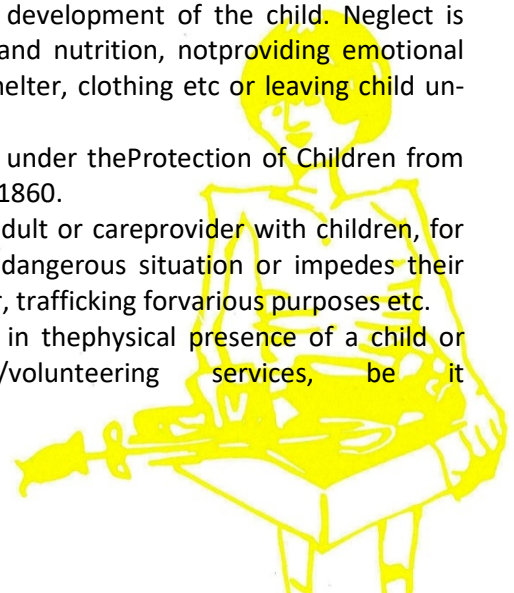
on the Government of India to ensure that every child living in any environment is protected and safe from neglect, discrimination, violence, abuse, economic and sexual exploitation, or violation of rights and the environment is strengthened by strong prevention and response mechanisms.

The Government of India affirms its commitment to these national and international mandates. The Government of India recognizes that ensuring child protection and protective environments requires protective measures, procedures and programmes for the child and care providers. The National Child Protection Policy sets the standards for child protection within the State and identifies the roles and responsibilities of various stakeholders to ensure that all children in the nation have the right to child protection and a protective environment.

2.2 DEFINITIONS

- a. **“Child”** : is any person under the age of 18 years, or one who has not completed eighteen years of age as per Section 2 (k) of the Juvenile Justice (Care & Protection of Children) Act 2000.
- b. **“Child abuse”** : Child abuse or ‘maltreatment’ constitutes ‘all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, 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.’²
- c. **“Child rights friendly”**: means any process and interpretation, attitude, treatment and environment, that is humane, considerate, non-discriminatory and is in the best interests of the child.
- d. **“Child sensitive environment”**: is one where the ambience of a place makes a child feel comfortable, be herself/himself without inhibition, and is non-threatening.
- e. **“Competent Authorities”**: shall mean and include the authority recognized under applicable laws including, the Child Welfare Committees, World Health Organisation, Juvenile Justice Board, Special Juvenile Police Units, mandated under the Juvenile Justice (Care & Protection of Children) Act, Special Court under the Protection of Children from Sexual Offences Act 2012, National Commission for Protection of Child Rights under the Commissions for Protection of Child Rights Act, 2005, and any other competent authorities recognized under any other laws pertaining to children.
- f. **“Forms of Abuse”**: Child abuse includes physical, emotional or psychological, sexual abuse, neglect, maltreatment, discrimination etc.
- g. **“Harm”**: An act or behaviour, often intentional, that hurts, causes grievous injury, pain or trauma to the child. Most often this is physical and sometimes could also be self-inflicted, such as cutting, burning, misuse of substances etc.
- h. **“Neglect”**: A condition where there is failure to protect the child from exposure to any kind of harm or danger that results in significant impairment in the health and development of the child. Neglect is often prolonged and includes starvation or not providing food and nutrition, not providing emotional support, or medical, educational, and other basic care such as shelter, clothing etc or leaving child unsupervised.
- i. **“Sexual Abuse”**: Acts or behaviour that constitute an offence under the Protection of Children from Sexual Offences Act, 2012 (POCSO) and/or the Indian Penal Code, 1860.
- j. **“Exploitation”**: Any willful or coerced act or behaviour of an adult or care provider with children, for economic gain or not, that places them in a difficult, harmful, dangerous situation or impedes their overall development. For eg. beggary, child marriage, forced labour, trafficking for various purposes etc.
- k. **“Persons in direct contact with children”**: Persons who are in the physical presence of a child or children as part of their professional/honorary/volunteering services, be it regular/occasional/temporary/longterm.

² World Health Organisation definition



l. **“Persons in indirect contact with children”**: Persons whose work does not require them to be in the physical presence of a child as part of their professional/honorary/volunteering services, be it regular/occasional/temporary/long term, but encompasses access to information about the child such as personal details and other data including photographs, medical records, case files etc.

m. **“Child protection”**: Means the fundamental right of every child to be protected from neglect, discrimination, all forms of violence & abuse, and exploitation while in the care of any individual, institution, system, or authority.

n. **“Protective Environment”**: Means and includes environments that ensure child protection and secure the child in an environment with the following elements:

- 1) Safety and freedom from abuse, neglect, exploitation and any form of violence
- 2) Prevention of risk of harm
- 3) Vulnerability is reduced and addressed
- 4) Children have access to child protection services and support systems
- 5) Child protection system prevents and addresses slippage from safety net and social security programs
- 6) Provides for accountability of the State to the children
- 7) Provides for accountability of the people and the community at large to the children.

2.3 APPLICABLE LEGAL FRAMEWORK

Children today are recognized as the subjects of rights and not just as “objects of protection”³

The following international and national laws, policies and guidelines lay the foundation for this National Child Protection Policy.

a. The United Nations Convention on the Rights of the Child, 1989

(“UNCRC”): The UNCRC signed and ratified by India, recognizes that every child is entitled to an umbrella of protective rights based on principles and standards developed in the best interest of the child.

b. Constitution of India: Child protection is articulated in several provisions of the Constitution of India including Article 14 (right to equality and equal protection of the law), Article 15(3) (fundamental right of the State to make any special provision for women and children), Article 21 (right to life and personal liberty), Article 21A (right to education), Articles 23 and 24 (rights against exploitation) Article 39(e) (right to health and freedom from abuse due to economic necessity) and Article 39 (f) (Right to development with dignity) and Article 51A(k) (duty of parents or guardians to provide opportunities for education). The Government of India under the Constitution has a primary responsibility to ensure that all the needs of children are met and that their basic human rights are fully protected.

c. The Juvenile Justice (Care & Protection of Children) Act 2000 (JJ Act)

d. The National Charter for Children in 2003 (“Children’s Charter”)

e. National Plan of Action for Children, 2005 (“NPA 2005”)

f. The Commission for Protection of Child Rights Act, 2005

g. Right of Children to Free and Compulsory Education Act 2009 (“RTE”) :

The Integrated Child Protection Scheme (“ICPS”)

h. The Protection of Children from Sexual Offences Act, 2012 (“POCSO”)

i. The National Policy for Children, 2013 (“NPC 2013”):

j. Sexual Harassment of Women at Workplace (Prevention, Prohibition and

Redressal) Act, 2013 (POSH): is a central legislation that seeks to protect women from sexual harassment at their place of work, however this Act has been interpreted to extend protection to the girl child in schools, workplaces or other similar environments.



³The South Asian Report on the Child Friendliness of Governments, 2013 available at www.southasianreport.org

- k. Advisory for eliminating of Corporal Punishment in Schools
- l. Guidelines for recording of evidence of vulnerable witnesses in criminal matters
- m. Standard Operating Procedures in safeguarding Rights of Children in contact with Railways
- n. Child Labour (Prohibition and Regulation) Act, 1986
- o. Child Labour Act Amendment 2006
- p. Bonded Labour System (Abolition) Act, 1976
- q. Factories Act, 1948
- r. Infant Milk Substitutes, Feeding Bottles and Infant Foods
- s. Pre-natal Diagnostic Techniques Act, 1994
- t. Persons with Disabilities Act, 1995
- u. Prohibition of Child Marriage Act, 2006
- v. Immoral Traffic Prevention Act, 1986
- w. Guardians and Wards Act, 1890
- x. Hindu Adoption and Maintenance Act, 1956
- y. Right to Food Legislation and Children
- z. Scheduled Castes and Scheduled Tribes Act, 1989
- aa. National Disaster Management Act 2005
- bb. National Disaster Management Guidelines: School Safety Policy- 2013
- cc. Karnataka Victim Compensation Scheme – 2011
- dd. Integrated Child Protection Scheme (ICPS)
- ee. Existing State Child Protection Policies - The National Child Protection policies should be designed and implemented in convergence with State Child Protection policies (where they exist)

2.4 GOVERNING PRINCIPLES & MINIMUM STANDARDS

The National Child Protection Policy is formulated and guided by certain non-negotiable fundamental principles⁴. These governing principles as stated hereunder shall be fundamental to the application and implementation of this National Child Protection Policy, and form the base of all laws, standards or guidelines issued in connection with the National Child Protection Policy.

a. **Principle of Best Interest of the Child:** This principle mandates that the best interest of the child must be a primary consideration of all stakeholders while making any decision concerning the child⁵. Based on this principle the Government of India shall endeavor to the maximum extent possible that all other child related policies are formulated and resources distributed in the best interest of the child. This principle in particular underpins the rights and duties of the state, as well as parents, guardians, educators and all other individuals legally responsible for child protection.

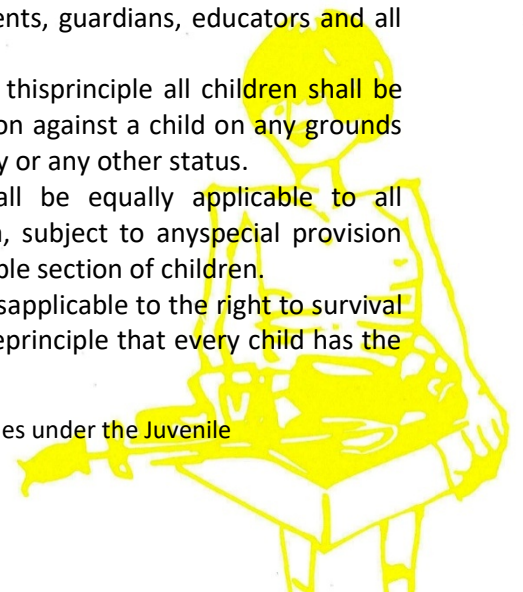
b. **Principle of Equality, Universality and Non-discrimination:** Under this principle all children shall be given equal opportunity and treatment. There shall be no discrimination against a child on any grounds including that of gender, religion, caste, class, geographic area, disability or any other status.

Based on this principle, the National Child Protection Policy shall be equally applicable to all persons between the ages of zero to eighteen in the nation of India, subject to any special provision made for the girl child or any other marginalized or particularly vulnerable section of children.

c. **Principle of Right to Survival and Development:** Combining all rights applicable to the right to survival and development, this National Child Protection Policy is based on the principle that every child has the

⁴These principles have been drawn from the UNCRC as well as guiding principles under the Juvenile Justice (Care & Protection of Children) Act 2000.

⁵Article 3 of the UNCRC



right to life, that takes in account living conditions, the quality of life and the right of every child to develop to his or her maximum potential.

d. Principle of Right to Participation: Children have the right to be heard, listened to and participate in all matters that affect them, at almost all levels of society. This right has been emphasized in the Eleventh and the Twelfth Five Year Plan (2012–2017) documents, the NPC 2013 and the JJ Act, and Karnataka JJ State Rules 2010.

Based on this principle the National Child Protection Policy explicitly recognizes the State's obligation to create an environment for others to be able to hear children's views (with due regard to the age and maturity of the child) and to create spaces for communication based on mutual respect between adults and children⁶.

e. Principle of Dignity and Self-worth: All children shall be treated with respect for the child's sense of dignity and worth. The National Child Protection Policy is geared towards ensuring that all verbal and non-verbal communication with children is child-sensitive and respectful of the child's self-worth.

f. Principle of Confidentiality: Child protection includes the child's right to privacy and confidentiality. Except as prescribed by law, the right to privacy and confidentiality shall be maintained while addressing all forms of abuse.

This principle mandates that the confidentiality of the identity of the child involved is strictly protected. Identity of a child includes his or her name, address, photograph, family details, school, neighbourhood, or any other detail that may lead to disclosure of identity. The media as a stakeholder is in particular also bound by this governing principle of confidentiality and right for the protection of the child.

2.5 KEY CHALLENGES

At present the challenges and gaps to an effective and comprehensive child protection system are many, including the following.

- a. Limited understanding of the protection requirements under national and international laws among the people in general and among the functionaries responsible for protection of children;
- b. Insufficient understanding and attention to violence in the home and other related environments;
- c. Lack of recognition that protection can be of as many types as there are children with different needs and circumstances
- d. Inadequate personnel who are experienced, sensitized and trained social workers, teachers, medical staff, counselors, police and other personnel connected with child care services.
- e. Inadequate sensitization and training of personnel delivering child services. Inadequate resources and budget for providing child protection services.
- g. Gaps in enforcement and implementation of laws and schemes, like ICPS, for protection of children; and lack of monitoring mechanisms for the same.
- h. Insufficient promotion of child-sensitive justice system children

⁶The KSCPP provides an example of the inclusion of the Right to Participation in formulating child protection policies for educational institution. "Our Safety Our Voice" a child protection initiative for the children, by the children and of the children, facilitated and hosted by Inventure Academy with support from Enfold Proactive Health Trust, FeedBack Consulting, Concern for Working Children, and Mundkur Law Partners. Over 1000 children from across Bangalore cutting across a wide cross section of economic, social and cultural backgrounds expressed their views, concerns and demands for child protection in the State. These views presented in the form of a Charter to the Government, was used in formulating Operating Guidelines and Procedures for implementation in Educational Institutions across Karnataka and in framing the Checklist.



CHAPTER 3: APPLICABILITY AND IMPLEMENTATION

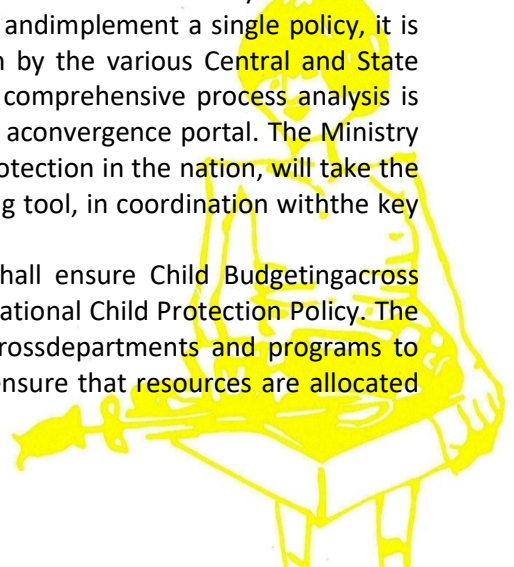
3.1 SCOPE OF THE STATE CHILD PROTECTION POLICY

The National Child Protection Policy will apply to all government departments, personnel, institutions, statutory bodies, NGOs who come in direct or indirect contact with children. The scope of this policy covers the responsibility of the state government to ensure safety and protection of all children in all situations and contexts, including educational and other institutions for children. As children in need of protection may be differently situated or found in different environments, under this umbrella National Child Protection Policy, guidelines, standard operating procedures will be formulated to the needs of differently situated children.

3.2 IMPLEMENTATION

The National Child Protection Policy will be implemented using the key considerations delineated hereunder.

- a. Operating Guidelines and Procedures: All Ministries and Departments of the Government of India, providing services to children under other Acts and Schemes, such as Ministries and Department of Women and Child Development, Police, Department of Primary, Higher and Secondary School and Collegiate Education, Department of Health, Department of Labour, Department of Law, Department of Social Welfare, Rural and Panchayath Raj Department, Backward Class and Minorities, District and Urban Administration, Department of Information etc shall notify the Operating Guidelines and Procedures as stated in the National Child Protection Policy, over a stipulated time period and in a phased manner, to operationalize and implement the provisions of this National Child Protection Policy as applicable to their Department.
- b. Appoint a National Nodal Officer: A National nodal officer will be appointed to facilitate effective interdepartmental and interagency convergence and coordination for planning, implementation, monitoring and review and ensuring the effective and efficient implementation of the National Child Protection Policy.
- c. Facilitate human resource development: An element crucial to the success of the National Child Protection Policy is training and sensitization of all personnel responsible for the implementation of the National Child Protection Policy and all stakeholders responsible for child protection. It is imperative that this human resource development initiative is introduced as a regular and recurring feature of this National Child Protection Policy.
- d. Create an interagency convergence portal: As the National Child Protection Policy is based on the partnership principle involving multiple stakeholders to promote and implement a single policy, it is important to have a dedicated portal that facilitates communication by the various Central and State departments and provides a platform for stakeholder interaction. A comprehensive process analysis is the first step required for planning the required computerization for a convergence portal. The Ministry of Women and Child Development, as the nodal ministry for child protection in the nation, will take the lead to develop and implement a web-based monitoring and reporting tool, in coordination with the key departments such as Education, Police, Social Welfare.
- e. Prepare a child protection budget: The Government of India shall ensure Child Budgeting across departments towards effective and efficient implementation of the National Child Protection Policy. The Government of India shall also undertake child budget analysis across departments and programs to assess the budgetary spend on child protection within the state to ensure that resources are allocated adequately and appropriately utilized.



f. Impact assessments of child protection: Reports from all child protection functionaries and other child protection agencies such as Childlines, Child Welfare Committees etc., ministerial and departmental data collection endorsed by the highest level of government when linked to the state development planning and included in state/national budgeting, will be an effective mechanism to keep this National Child Protection Policy relevant and progressive.

g. Translation: The National Child Protection Policy and any other customized National Child Protection Policy such as the National Child Protection Policy for Educational Institutions must be made known widely by translating it into vernacular languages commonly used in the Government of India and disseminating it extensively, including on the internet.

h. Referral systems: The Government of India shall strive to put in place protocols that enable effective referrals of children who may need care and protection and the referral shall include legal services or support, medical, psycho-social services, educational and other rehabilitation guidance and services, victim compensation etc.

i. Awareness creation: The Government of India shall design and develop National Child Protection Policy related IEC

materials in vernacular and English on child protection and safety issues for the general public and all stakeholders. All communication material will strive to impact behavioural changes by addressing mindsets, conventional practices, prejudices and pre-existing perceptions of all stakeholders. Material developed will also encompass legal provisions for protection of children. All mediums of mass communication such as print, visual, folk arts, theatre, street plays etc., shall be used for effectively reaching out to the public and targeted stakeholders as required.

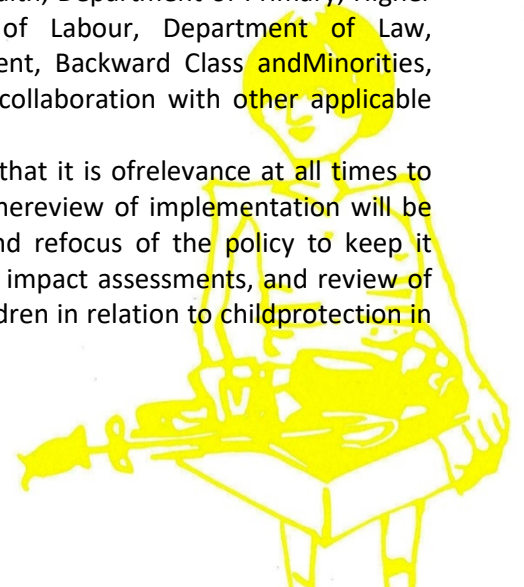
j. Confidentiality and privacy: Every Ministry, Department and stakeholder privy to any confidential information shall ensure that all information concerning a child is stored or shared in a manner that protects the privacy and legal rights of the child and protects the dignity of the child, in accordance with applicable law.

k. Monitoring and Evaluation: The Government of India shall formulate a monitoring and evaluation platform from the local to the state level to assess the adherence to the implementation plan and effect mid-term corrections and incorporate changes for effective implementation.

3.3 REVIEW AND MONITORING OF THE NATIONAL CHILD PROTECTION POLICY

The Principal Secretary Ministry of Women and Child Development shall be the Nodal Officer to review this National Child Protection Policy annually. The Ministry of Women and Child Development, Government of India shall facilitate this review in coordination with the other applicable departments, that provide services to children, such as, Police, Department of Health, Department of Primary, Higher and Secondary School and Collegiate Education, Department of Labour, Department of Law, Department of Social Welfare, Rural and Panchayat Raj Department, Backward Class and Minorities, District and Urban Administration, Department of Information, in collaboration with other applicable departments and agencies of the State.

This policy shall be reviewed from time to time to ensure that it is of relevance at all times to needs of child protection in India. The results of the review of implementation will be utilized during the policy review to enable adjustments and refocus of the policy to keep it continually relevant. Review mechanisms shall include child impact assessments, and review of all laws, policies and action plans that affect the lives of children in relation to child protection in the country.



3.4 COMPLIANCE

Compliance under this National Child Protection Policy advocates a two-pronged approach based on the following.

- a. Incentivizing implementation with the objective that child friendly governance must be internalized by all stakeholders as the only acceptable form of addressing child protection.
- b. Recognizing all legal obligations and redressal mechanisms and consequences on child protection as prescribed under all existing central or state legislations such as under the JJ Act and Rules, the POCSO Act and Rules, and the Indian Penal Code

The Government of India stands firmly committed to ensuring that the legal responsibility in following all procedures, guidelines, and penal consequences under all applicable laws is strictly followed. All reasonable efforts shall be taken to ensure that the National Child Protection Policy is implemented within a stipulated period and in phased manner, with provision and scope for corrective measures.

We sincerely urge you to **consider the above recommendations and submission, which have been made in a child rights framework**, when planning further action on the Policy.

For The Concerned for Working Children,

Kavita Ratna
Kavita Ratna
Director Advocacy

