



BEST PRACTICE GUIDE FOR CASE WORKERS

**Providing Assistance in Legal and
Court Proceedings to a Child
Rescued from Sex Trafficking**

In the best interest of the child

Acknowledgement

We would like to thank Hon'ble Swati Chauhan, J. and Hon'ble Roshan Dalvi, J. Adv. Nandini Thakkar Singh, Adv. Kile D'souza, Mr. Saurabh Malik, Ms. Kishori Salunkhe, and Ms. Swati Bakre for their valuable time in reviewing the document and providing their constructive suggestions for the same. Their contribution to this document is quite appreciated.



Introduction to the system

The criminal justice system in India is very complex. Prosecution requires both documentary/material, and oral evidence which is the statement given orally by the victim under oath before a competent judicial officer and is subsequently subjected to cross examination by the defense lawyer. A testimony does not become admissible evidence unless it passes through cross examination by the defense counsel. Unlike in a murder trial in the cases of sex trafficking of children, the victim's testimony forms an integral part of the trial. The victims are expected to narrate the instances of their abuse with vivid details in a convincing manner to the judicial officer. It is now widely acknowledged that the physical infrastructure, superstructure and social ambience are not just unfamiliar to the child¹ victim but are also significantly intimidating.² Thus, it has been observed that the pre-trial and trial procedures of cases of commercial sexual exploitation often have the high potentiality to re-victimize a child rescued from commercial sexual exploitation and make him/her withdraw from seeking justice.

Need for the document

The stark difference in the ethos behind prosecution, and rehabilitation is quite conflicting. Rehabilitation of the child demands healing and recovery of the victim by forgetting the vivid and traumatizing details of the incident.³ On the other hand, prosecution being a long-drawn process expects the victim to hold onto those traumatizing details for long to be able to provide an accurate description of the incident. Visits to the police stations, court premises and other unfamiliar but intimidating places start right from the post-rescue phase and go on till the prolonged trial ends. As the case generally reaches the stage of trial after a considerable amount of time, it often disrupts the child's routine. The complexity of court procedures itself may also intimidate the child victim and its family/support systems. Lack of preparation of the child by the prosecution in understanding the court system and last-minute adjournments make it difficult for the child to navigate through the system. The almost complete lack of comfort for a child, be it a boy or a girl, makes it difficult to voice the trauma undergone during the incident of her/his sexual exploitation. Factors like the child's general anxiety about having to testify in a court, fear of facing the accused, the imposing presence of the judge, the defense counsel, public prosecutor, stenographer, and the police all together place significant stress on the child.

This harrowing experience for a child victim can be minimized if the stakeholders involved in the case approach it with sensitivity, keeping in mind the fragile and traumatized mental state of the child.

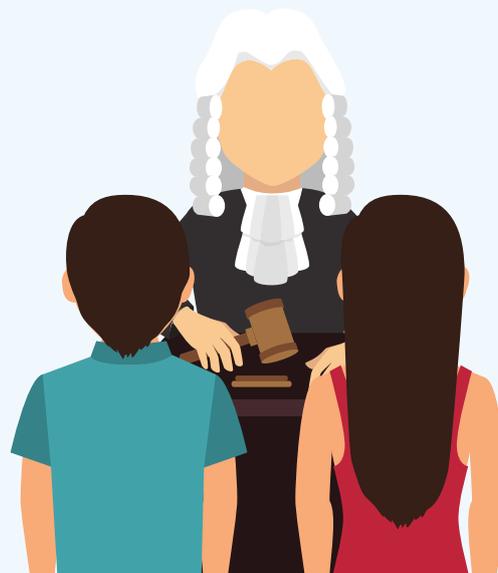
¹ Child means a person who has not completed eighteen years of age – Section 2(12) of Juvenile Justice (Care and Protection of Children) Act, 2015

² Dr. Pravin Patkar, Women Trafficking- Realities & Solutions, 2019, Drishti Stree Adhyayan Prabodhan Kendra, Pg. 13

³ Ibid



This document is an attempt to sensitise a social case worker while assisting a child victim of sex trafficking through the process of criminal prosecution of the accused. The trauma of the child can also be mitigated if s/he is made aware of the procedures in prosecution (or trial process) by someone who knows and understands the process well in advance. This enhances the comfort level of the child. The child needs an experienced and strong support system to ensure a hassle-free experience. This has resulted in the need to follow a system which ensures that the rights of the child are not violated during the legal process, be it in the pre-trial or trial phase.



This document is Prerana's humble attempt to evolve a user friendly and practical protocol on providing victim assistance services in the legal sphere to child victims of sex trafficking based upon its ground level experience of more than two decades.

Who may use this document?

This document is primarily for a case worker⁴ who escorts the child through the trial procedures. A case worker provides comprehensive social services and support to the child, and can be interchangeably used with the term 'social case worker' as understood in the international context. With the passage of the Protection of Children from Sexual Offences Act 2012 under its Rule 7 of POCSO Rules 2012, the Child Welfare Committee are expected to appoint a Support Person to assist the child from the pre-trial to trial phase. The social case worker is thus expected to reach out to and coordinate with the Support Person⁵ to provide assistance. Such assistance may begin from finding out the next court date online through the e-courts website and cover more complex tasks. There are also instances where the social case worker of a child care institution⁶ is appointed as the Support Person and such social case worker is required to provide comprehensive assistance to the child victim. Such duty bearers are the end users of this document.

The tips given in this document may be used on a case-to-case basis. as needed and in the best interest of the child.

4 Rule 2(iii) of Maharashtra State Juvenile Justice (Care and Protection of Children) Rules, 2018 defines case worker as a representative from a registered voluntary or non-governmental organisation who shall accompany the child to the Board or the Committee and may perform such tasks as may be assigned to him by the Board or the Committee;

5 Rule 2(1)(f) of POCSO Rules defines Support Person as a person assigned by a Child Welfare Committee, in accordance with sub-rule (8) of rule 4, to render assistance to the child through the process of investigation and trial, or any other person assisting the child in the pre-trial or trial process in respect of an offence under the Act

6 Section 2(21) of the JJ Act, 2015 defines "child care institution" as Children's Home, open shelter, observation home, special home, place of safety, Specialised Adoption Agency and a fit facility recognised under this Act for providing care and protection to children, who are in need of such services



Disclaimer

The document is divided into three sections. The first section is non-negotiable in nature and has been stated by law and hence, must be mandatorily complied with. The other two sections provide some best practices observed on field and have been segregated as practices in terms of procedures, and practices in terms of interaction/behaviour with the child.

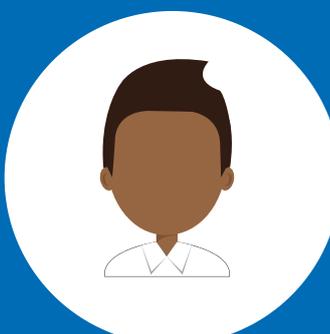


It is important to note that this document follows the typical courtroom setting in India, and it does not claim to be exhaustive in any way. It is a best practices' document derived from on-ground experience, and should be read with the relevant provisions of the law as and when required.

The document often makes references to provisions of Protection of Children from Sexual Offences (hereinafter referred to as POCSOA), 2012 since cases of children rescued from sex trafficking and commercial sexual exploitation also attract provisions of this law. The POCSOA lays down certain guidelines to be followed in the pre-trial to trial phases, and POCSO Rules also have the provision of a Support Person to assist the child through the same. If a separate agency has been appointed as a Support Person, it is good practice for the case worker to be aware of their roles and responsibilities under the law. Additionally, for times when the case workers themselves are appointed as Support Persons, they can make use of these guidelines to assist the child.

It is also important to note that the person may have been rescued as a child i.e. a person below the age of 18 years, but often crosses the age of 18 by the time the case is being tried in the court of law. Thus, although the term 'child' is used throughout the document, it may be applied in an age-appropriate manner.





SECTION I

NON- NEGOTIABLE PRACTICES:
Stated by law – must be
complied with

The practices mentioned in this section are rights of the children as laid down by the law, and a reference to the relevant legal section has been made accordingly. Some of these provisions are binding by the law on the respective duty bearer whereas some provisions are recommended by the law at the discretion of the duty bearer. In cases where the text of the law leaves the implementation of the provision at the discretion of the duty bearer, the case worker should inform the duty bearer the need and reason/s for which the provision should be made use of, in the best interest of the child. In cases where the text of the law prescribes a mandate on the duty bearer to follow the provision, non-compliance of the provision should be reported to a higher authority.

1. Provision of Support Person:

Under Rule 4, sub rule 9 of the Protection of Children from Sexual Offences (hereinafter referred to as POCSO) Rules, 2012, the Special Juvenile Police Unit (SJPU) or local police is required to inform the appointment of 'Support Person' to the Special Court. Ensure that a copy of the Order reaches the police station for the same to happen.

2. Information about the case:

Obtain regular updates from the Investigating Officer on the case and/or the date of the next court proceeding.



It shall be the responsibility of the SJPU, or the local police to keep the child and his parent or guardian or other person in whom the child has trust and confidence, and where a support person has been assigned, such person, informed about the developments, including the arrest of the accused, applications filed and other court proceedings ⁷

3. Rule 8(4) of POCSO Rules, 2012 makes it the responsibility of a Support Person to ensure that the child is **aware of his/her role in the Court**, for example, informing the child that s/he would be expected to state the facts of the case before the Judge during his/her statement or at the time of recording of evidence.



Inform the child of the role he may play in the judicial process... ⁸

4. Powers of Special Courts:

Section 33 of the POCSOA - 2012 states the procedure to be followed in cases being tried under this Act, and gives the Special Courts (created under Section 28) the power to enforce the same. Some of it are listed below, and it is helpful for a case worker to be aware of the same.

7 Rule 4(11) of POCSO Rules, 2012

8 Rule 4(8) of POCSO Rules, 2012



i) The counsels for both prosecution and defence are not permitted to conduct any sort of examination, be it examination-in-chief, cross examination or re-examination of the child, directly. The questions must be communicated to the Court, and the Judge will then put those questions to the child.⁹ This also allows the Court to avoid any questions which will cause harm to the dignity of the child or affect his/her state of mind.

ii) The Court may permit frequent breaks for the child during the trial.¹⁰

iii) The Special Court shall create a child-friendly atmosphere by allowing a family member, a guardian, a friend or a relative, in whom the child has trust or confidence, to be present in the Court.¹¹ This gives the case worker the right to be present in the court if the child wishes so for his/her ease and comfort. It is also pertinent to interpret the legislation's objective in permitting the presence of a family member, guardian, or a relative. This has been done to ensure the child's comfort and is in his/her best interest. Thus, the presence of family members in cases of victims rescued from commercial sexual exploitation wherein the family is observed to play a role in the child being trafficked and/or exploited is also not in the child's best interest.

iv) The child has the right to not be repeatedly called to testify in the Court.¹²

The dignity of the child should be maintained at all times, and aggressive questioning or character assassination of the child shall not be permitted.¹³

5 . No contact with the accused

Section 36 of the POCSO Act, 2012 requires the Court to ensure that the child does not come in contact with the accused during the time of recording the evidence, while at the same time ensuring that the accused is in a position to hear the statement of the child and communicate with his advocate. This is also backed by the procedure of recording of evidence as laid down in Section 273 of the Code of Criminal Procedure Act, 1973 which states that:



Provided that where the evidence of a woman below the age of eighteen years who is alleged to have been subjected to rape or any other sexual offence, is to be recorded, the court may take appropriate measures to ensure that such woman is not confronted by the accused while at the same time ensuring the right of cross-examination of the accused.

9 Section 33(2) of POCSO Act, 2012

10 Section 33(3) of POCSO Act, 2012

11 Section 33(4) of POCSO Act, 2012

12 Section 33(5) of POCSO Act, 2012

13 Section 33(6) of POCSO Act, 2012





In the case of *Prerana v/s State of Maharashtra*,¹⁴ Hon'ble Ranjana Desai, J. has also emphasised on the importance of sight and sound separation between the accused and the victims during the time of rescue. The Order directs the Special Police Officer *to separate the rescued victims from the offenders immediately upon the rescue operation, and to convey them in separate vehicles.*¹⁵ It is important that the practice of separating the victims from the accused at all times by sight and sound is carried out throughout the process of pre-trial to trial, in order to minimise the negative impact on the victim's state of mind. The Bombay High Court, being a Court of record under Article 215 of the Indian Constitution, sets a precedent that is binding on all the lower courts in the state of Maharashtra.¹⁶

6. Video-conferencing:

To ensure that the child and the accused does not come in contact with each other, Section 36 (2) of the POCSO Act, 2012 gives the Court the power to record the statement of a child through video conferencing or by utilising single visibility mirrors or curtains or any other device.



*The Supreme Court in State of Maharashtra vs Dr. Prafull B. Desai and Another*¹⁷ has upheld recording of evidence through video-conferencing and provisions of the Information Technology Act, 2000 and the Indian Evidence Act, 1872 shall apply to the same.

7. In- camera trials:

Section 37 of the POCSO Act, 2012 states the trial to be conducted 'in-camera' and in presence of any person in whom the child has trust or confidence (which may also be a case worker or a Support Person in cases where one has been appointed). Ensure that no unauthorized person is present during an in-camera proceeding.

8. Translator/interpreter:

Section 38 of the POCSO Act, 2012 gives the Court the power to appoint a translator or interpreter to record evidence of the child, as and when required. It also provides a provision of appointing a special educator for children with any mental or physical disability. The provision should be made use of, as and when the need arises.

14 Criminal Writ Petition No. 1694 of 2003, Bombay HC

15 Ibid, point 3(h) and (i)

16 Dr. BS Chauhan, Former Judge of Supreme Court of India – Law of Precedent

17 AIR 2003 SC 2053



9. Confidentiality:

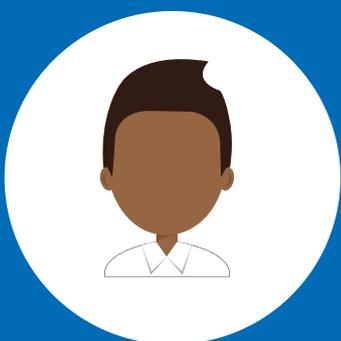
The Juvenile Justice (Care and Protection) Act, 2015 (hereinafter referred to as JJ Act, 2015) prohibits the disclosure of any inquiry, investigation or judicial procedure in any form of media or communication.¹⁸ This is reiterated in the principle of confidentiality in the JJ Act, 2015 which states that every child shall have a right to protection of his privacy and confidentiality, by all means and throughout the judicial process.¹⁹ Even POCSOA prevents any such disclosure that may reveal the identity of a child. The case worker should not enable any such publication by making a statement to any person, as such disclosure is punishable under the law.²⁰

18 Section 74 of JJ Act, 2015

19 Section 3(xi) of JJ Act, 2015

20 Section 23(2), Section 24(), Section 33(7) of POCSO Act, 2012





SECTION II

BEST PRACTICES OBSERVED FROM ON-GROUND EXPERIENCE - PROCEDURAL

1. If any person/ non-governmental organization is appointed as Support Person under Rule 4(7) of POCSOA Rules, 2012 by the Child Welfare Committee (hereinafter referred to as CWC), ensure that passing of such Order is communicated or informed to the Public Prosecutor in advance. It is the responsibility of the police to inform the Children's Court²¹ but it is often observed that the same is not followed in practice.

2. The case worker should carry the Order issued by the CWC at all times, and ensure that the Support Person does so too, if one is appointed. Any other Order passed by the CWC with regard to socio-legal support, follow-up for rehabilitation, etc. should also be carried. It is important to have all the paperwork (any other Orders or documents) ready in advance.



3. It is also relevant that such an Order is also made known to the Judge, in view of the *locus standi* of the Support Person being questioned by the defense counsel.

4. Ensure the child is informed well in advance about the date on which the child would be required to go for his/her testimony. The child needs time to compose himself/herself for the same and last-minute intimation can be stressful for the child.



The child²² can either be residing in a child care institution, or restored to the family. If you have been appointed as a case worker or a Support Person for a child living in a different child care institution - inform the staff of the child care institution as well since they are the legal custodians of the child for the present time. If the child has been restored - inform the family of the child.

5. For a child placed in a child care institution, it is essential for the child care institution to obtain an Order of the CWC to present the child in the Court for hearing. The case worker should convey to the Investigating Officer the importance of sending a copy of the Order of the Court summoning the child as it helps the child care institution in procuring the required permission from the CWC.

6. For a child restored to the family, the family should also be asked to carry all important documents like birth certificate, school leaving certificate, identification proof of the parents, etc. as it has been observed from the ground that a document establishing the identity of the child and the parent is often asked for. A document establishing the relationship of an individual (parent) with the child should also be carried along.



This should be interpreted only for cases where the family members are not involved in the trafficking and/or exploitation of the child.

21 Rule 4(9) of POCSO Rules, 2012

22 There is a possibility of the case worker either belonging to the child care institution, or a different case worker from an external organization has been appointed to assist the case worker of the child care institution in the process of rehabilitation.



7. In case of a child living in a child care institution wherein a different case worker has been appointed to assist in the rehabilitation, the case worker should discuss relevant documents required for the case with the duty bearers²⁴ if the child care institution to ensure things like memo for the escort has been sent, and that all the documents would be sent with the child – It helps to carry photocopies as well. Ensure the Order of Child Welfare Committee permitting the child to leave the child care institution to appear for the hearing is granted and carried along.



Either way, valid identity proof of the child to establish him/her as the victim beyond reasonable doubt should be carried.

8. In addition to be informed of the court date, it also helps when the child is informed of the procedural steps of criminal prosecution beforehand as it reduces the general anxiety, any surprises or a shocking incident. The child could be made aware of the system in the following ways:

i. Orientation of the child is an integral part of any victim assistance program. It is important for the child to be made aware of the procedure, the reason behind it and the outcome derived from it.

ii. Statement/ Stage of evidence recording: It is incorrect to assume that the child will narrate facts of the case to every other person without prior information and context. It is advisable for the child to be explained everything that is expected of him/her beforehand.

9. It is also important to explain the child the nature of examination of witness, i.e. examination-in-chief and cross examination. Examination-in-chief is the examination of a witness by the lawyer that produces the witness. Cross examination is the examination of witness conducted by the opposition lawyer, the defense counsel in this case.

10. The child should be made aware that the WPC (woman police constable) will be dressed in plain clothes but there can be other officers accompanying who will be in uniform. The case worker can discuss the roles and duties of police as a law enforcing authority with the child, and how the child has no reason to be scared of them. The child should also be made aware that the concept of being dressed in plain clothes is a result of child-friendly systems.

11. If the statement or examination is recorded at a certain time, it is prudent to enquire and inform the child of this. For example, if a particular Magistrate only records statement in the afternoon, time could be saved if the case worker reaches the Court with the child at the appropriate time.

23 This term may include the Child Welfare Officer and Person-in-charge (Superintendent) as defined in the Maharashtra State Juvenile Justice (Care and Protection of Children) Rules, 2018



12. Ensure that the courtroom number is known beforehand. It would be anxiety invoking for the child to feel lost in the Court.

13. The case worker can be in contact with the Support Person to be aware of the status of the court proceedings. Additionally, the case worker can be trained to check the case status online to smoothen the process.

14. The child must be accompanied by a trusted adult at all times and never left unsupervised unless directed by the Judge. Even then, if the child feels uncomfortable and does not want to be left alone, the Judge can be requested to make an exception in the best interest of the child.

15. The 'person allowed to be present with the child during an in-camera proceeding' is there for the child's emotional support and is prohibited from saying anything during the statement. Even nonverbal communications like facial expression and gestures can be a ground for being asked to leave the court room. There should be no communication with the child while s/he is giving the statement in the court. It is advisable to not sit in the child's direct line of vision.

16. The case worker should also inform the child and his/her present custodians the right of the child (witness) to appoint a private counsel, who can assist the public prosecutor during the course of the trial.

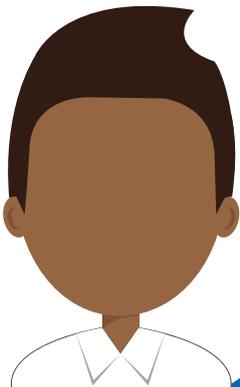
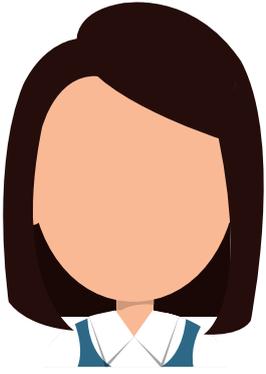


Note: Courts in the past through their judgments have interpreted the law and laid down certain guidelines to be followed with regard to testimony of a victim of sexual assault. Two such judgments are Sakshi vs. Union of India²⁴ and Alakh Alok Srivastava vs. Union of India.²⁵ The case worker can read the judgments to know more about witness protection services in the legal space.

24 AIR 2004 SC 3566

25 AIR 2004 SC 3566





SECTION III

**BEST PRACTICES OBSERVED FROM
ON-GROUND EXPERIENCE - IN
RELATION TO THE CHILD**

1. The child's desire to not share personal/ sensitive details with a lot of people, (even some of the staff members of the child care institution) should be respected.
2. The CWC can be requested to issue directions for a police escort if required, even if the child is restored to the family.
3. Travel to and from the Court should be planned in advance and adequate care should be taken to ensure that the easiest route is chosen. It is also advised to inform the child about the travel route to the court, the time taken for the journey and the mode of transport to be used. This is applicable in both cases – whether the child is living in a child care institution or restored to the family.
4. The various entry and exit points should be explained to the child beforehand for his/her ease and convenience.
5. It is advisable to ask the child to be dressed in comfortable, light coloured clothing as the interiors of a Court can be crowded.
6. The child should be informed that the proceedings might last the whole day and there is no fixed time within which it has to be finished. It is also prudent to carry a child-friendly kit consisting of storybooks, simple puzzles or video games, to keep the child engaged during the waiting period. It is also advised to always carry water and some snacks for the child.



It should be understood that a child-friendly kit might differ from child to child, based on his/her interests. One can have such a kit ready with various articles in it, and the case worker can ask the child what s/he would prefer out of those. Victims of sexual assault often lose their agency without even realising it, and inclusive practices like these are preliminary steps towards reclaiming the agency therapeutically. It is reiterated that the person may become an adult during the time of trial, and thus the guidelines should be modified keeping in mind the age of the person.

7. The child should be explained beforehand that s/he should not be afraid of anyone's attitude/demeanour in the court. Particularly, the child should not feel intimidated by the questioning style of the defence counsel.
8. There can be instances wherein the child would not want to say things in the court, but this does not necessarily mean the child has become a hostile witness. At times the child would want to disclose all the facts but are unable to say those things out loud. Thus, it is important to help the child find the courage to say the words s/he needs to say.



9. Although the law prohibits character assassination of the child and requires the questioning to not be aggressive, questions that may negatively affect the child are often asked and sometimes demanded to be answered. It helps if the child is informed in advance that defence counsel's questioning style must not be taken personally and s/he is doing that in accordance to their role towards the accused. Additionally, in such cases, it is important to have psycho-social and/or mental health support available for the child post the hearing.

10. The defence counsel's attempt to discredit the child's statement may make the child feel guilty. It is in the child's best interest to have mental health support available readily before and after the court proceedings, and sometimes during the proceedings as well.

11. In India, due to the lack of mental health professionals working with children in need of care and protection, ensuring the availability of such a resource might prove to be difficult. The case worker can equip herself/himself to tackle such situations and learn some tips by discussing these possibilities with a trained mental health professional beforehand

12. 'On-ground' experience has revealed the possibility of multiple accused in the case, and different accused hiring different lawyers in the same case. Thus, the cross examination can be conducted on behalf of each of those lawyers, if they demand so. Sometimes, it also happens that the other lawyers excuse themselves from individual cross examination by accepting the cross examination conducted on behalf of one lawyer. The possibility of multiple statements should be conveyed to the child.

13. If presented with evidence during testimony, the child should first examine it carefully and only then make a statement regarding its identification (the statement could be anything from a handwritten note to a piece of clothing, etc). The child should also be made to understand that s/he is not expected to hurry while answering any question.

14. It should also be ensured that the child is not forced to say anything that s/he does not wish to say. There is a constant struggle between rehabilitation of the victim, and justice by way of conviction, and the case worker should not compel or pressure the child to pick between these two. Only the child has the right to make an informed decision regarding the same.

It has been observed that the child often gets distressed on seeing the accused. As far as possible, it is prudent to block the direct line of sight between the child and the accused to avoid causing the child any unnecessary distress.





It is important to note that the child may react differently. The child could either be distressed at the thought of facing the accused, or could be eagerly waiting to meet and converse with the accused. The latter is often observed in cases where the alleged accused is known to the child, as often noticed in cases of sex trafficking. In such cases, the child has difficulty in processing his/her emotions. The case worker should be equipped to handle the emotions of the child either way.

16. There are certain communities wherein children are forced into the sex trade by way of intergenerational trafficking for the purpose of commercial sexual exploitation. Thus, it is not uncommon for an alleged accused to be a family member or a 'boyfriend' of the victim, which often increases the sense of betrayal and subsequent trauma. The child might feel distressed seeing a known person as the alleged accused and might not want him/her to be punished out of guilt. There may be chances where the child approaches the alleged accused, and in a sudden rush of emotions runs to make contact with the them. It is important for the case worker to be sensitive to the circumstances, while not reprimanding the child but also ensuring that the contact between the alleged accused and the child is discontinued immediately.

17. The case worker must not keep asking the child any questions or talk about the case endlessly during the child's break. A break is essential for the child's state of mind and his/her comfort should not be interfered with.

18. In an ongoing trial, the prosecution and defence will focus on their respective jobs – the former to obtain a conviction and the latter will focus on an acquittal. In the quest to fulfil their individual responsibilities, it is easy to forget that the child may suffer as a result of this clash. Proceedings in the court of law are in the best interest of justice, and it is inclusive of best interest of the child. It is important for the Judge to ensure the child's best interest– and the case worker should be mindful of the same.

19. After the hearing, the child might ask the duration for which the case could go on, and what the outcome of the case would be. The case worker should refrain from making any kind of statement promising the child a certain outcome. Even when the case ends in the current Court, there is always a possibility of appeal in the higher Court and the same should be conveyed to the child. The child should be made aware that ultimately the power of final judgment lies with the judiciary.

20. The case worker should remember that each child is different, and may react differently to different circumstances. The case worker should be flexible and move according to the child's pace.



21. Lastly, it should be discussed with the child that any event or happening was not the child's fault at all, notwithstanding anything that anyone might want them to believe. It is important that this fact is reiterated whenever required, in a language that the child understands and is comfortable with.



Note: Social case workers assisting children through the criminal justice system in such a comprehensive manner also need to take care of themselves. Often, people working with victims of trauma experience frequent and significant symptoms of secondary or vicarious trauma and 'burnout'. A case worker can only help the client if s/he is in a healthy state of mind to do so. To ensure an active and prolonged system of assistance, the case worker needs to ensure that s/he is not overburdened with cases. Being part of a support group with individuals experiencing similar experiences and following a self-care program is also recommended to ensure personal and emotional well-being of the case worker.



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