

BUNTS SANGHA'S

S.M. SHETTY

**EDUCATIONAL
INSTITUTIONS**

CHILD PROTECTION POLICY

2017

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BUNTS SANGHA'S S.M. SHETTY EDUCATIONAL INSTITUTIONS, POWAI

CHILD PROTECTION POLICY

1. BACKGROUND:

Children are more vulnerable than adults by the mere fact of being children, dependant on others for the realization of their rights. Recognizing this, Bunts Sangha's S. M. Shetty Educational Institutions, Powai, advocates strongly for proactive and universal child protection. All children and young people have the right to be protected from abuse regardless of their race, ethnicity, religion or belief, sex, gender identity, sexual orientation or disability. This includes children aged 0-18 years. Children are critically affected by the actions or inactions of adults around them. We believe that it is imperative for all stakeholders of the institution (children, parents, teachers, shadow teachers, contractual staff, non-teaching staff, Principals and Management) to practice the highest standards of child protection.

2. PHILOSOPHY:

At Bunts Sangha's S.M. Shetty Educational Institutions, our policies are in accordance with our Mission of "Personality Development for Nation Building" and we make a commitment to the safety, health and well-being of our students. Ensuring the protection and welfare of children is the responsibility of all of us who interact with children and young people. Child protection is therefore a priority for the educational institution and is at the core of all of its activities.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support,

protection and justice. It is the school's responsibility to safeguard and promote the welfare of its students. Children who are and feel safe, make more successful learners.

ZERO TOLERANCE TO CHILD ABUSE: Kneejerk reactions to recent incidents in the country often trigger stop-gap security measures, which are unsustainable. As an educational institution, school works in partnership with students, parents, the law and society in safeguarding children. Zero tolerance towards child abuse will result in the immediate dismissal of any employee convicted of an offence under the POCSO Act and/or any other sexual or violent crime under any other law.

3. VOICE OF THE CHILD:

The Child Protection Policy of the institution is driven by the voices of the children who are the major stakeholders of the school. Focus Group Discussions were held with a random sample of students from primary and secondary section of both the School – boards. Students' understanding of safety at home, school, on the road, playground and the school bus, were ascertained and their suggestions for a safer school were sought.

All children were well aware of personal safety, and made references to the sessions periodically held with them on safe-touch in the school. The older children expressed confidence in dealing with any hypothetical untoward incident in the school. The younger children said that they would not go anywhere without their teachers' permission and prefer to move about in pairs.

The children were candidly asked about how safe they felt in school. It was heartening to note that all children responded that they felt very safe in the school because of the following protective factors:

- Teachers are sensitive and approachable;
- Younger children stated that the security guards ensured that they did not trip or fall when walking up and down the stairs;

- The newly refurbished girls' washrooms provide privacy, which the older girls said give them a sense of security and dignity;
- There are CCTV cameras on each floor covering the corridors and the entry/exit to washrooms;
- There are CCTV cameras in the school buses too;
- There are separate lifts for school and college students;
- Younger children said that having lady housekeeping staff on the floor and washrooms, was comforting as they found them to be maternal towards them;
- The counsellors, teachers and parents regularly talk to them about good touch and bad touch

When asked what would make the school safer, the children expressed the need for:

- CCTV cameras in the classrooms;
- Male housekeeping staff to be deployed outside washrooms used by older boys;
- Housekeeping staff always be accessible during break times;
- More awareness drives on safety, disaster management and emergency responses;
- Increase in the number of designated bus marshalls to assist students board the bus during dispersal;
- Vigilance and extra scrutiny of visitors (and their belongings) entering the school.

Taking into account children's views, parents' concerns and the opinions of the principals and Management, the policy lists Institutional and Parental Responsibilities (See Section 16)

4. POLICY STATEMENT

The school will take all reasonable measures to:

- 1) Ensure that safe recruitment is practiced in checking the suitability of staff and volunteers to work with students.

- 2) Ensure that all visitors to the school are screened and authorised and are accompanied at all times.
- 3) Protect each student from any form of abuse, whether from an adult or another student
- 4) Be alert to signs of abuse both in the school and from outside
- 5) Deal appropriately with every suspicion or complaint of abuse
- 6) Design and operate procedures which promote this policy and as far as possible ensure that teachers and others who are innocent are not prejudiced by false allegations.

5. SCOPE OF THE POLICY

This policy is addressed to all members of staff and volunteers, is available to parents on request, is approved by the School's Management and will be published on the School website.

It applies wherever staff or volunteers are working with students even where this is away from the School, for example at an activity centre or on an educational visit.

Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. The focus of the policy is **protection** of children from abuse and **prevention** of child abuse.

Bunts Sangha's S.M. Shetty Educational Institutions, Powai, is committed to safeguarding and promoting the welfare of children and expects all staff, volunteers, parents and visitors to share this commitment.

6. LEGAL CONTEXT:

According to international law, a 'child' means every human being below the age of 18 years. This is a universally accepted definition of a child and comes from the United Nations Convention on the Rights of the Child (UNCRC), an international legal instrument accepted and ratified by most countries, India being one of them.

All people under the age of 18 are entitled to the standards and rights guaranteed by the laws that govern our country and the international legal instruments we have accepted by ratifying them.

6.1 The Indian Constitution

The Constitution of India guarantees all children certain rights, which have been specially included for them. These include:

- Right to free and compulsory elementary education for all children in the 6-14 year age group (Article 21 A).
- Right to be protected from any hazardous employment till the age of 14 years (Article 24).
- Right to be protected from being abused and forced by economic necessity to enter occupations unsuited to their age or strength (Article 39(e)).
- Right to equal opportunities and facilities to develop in a healthy manner and in conditions of freedom and dignity and guaranteed protection of childhood and youth against exploitation and against moral and material abandonment (Article 39 (f)).

This policy will deal specifically with the Right to Protection of children and the role of Bunts Sangha's S.M.Shetty Educational Institutions in implementing it.

6.2 Child Protection Legislation and Guidelines

Amongst the number of child related laws and regulations in India, the ones that relate to protection of children in schools, and referred to in this policy, are:

- Indian Penal Code, 1860
- Juvenile Justice Act (Care and Protection of Children) Act, 2015
- Protection of Children against Sexual Offences (POCSO) Act, 2012
- Ministry of Human Resource Department (MHRD) Advisory for Eliminating Corporal Punishment in Schools under Section 35 (1) of the RTE Act, 2009.
- Right to Education (Amendment) Act, 2012
- Ministry of Women and Child Welfare, Model Guidelines, 2013
- The Rights of Persons With Disabilities Act, 2016

7. CATEGORIES OF CHILD ABUSE

All school personnel should be familiar with signs and behaviours that may be indicative of child abuse. Child abuse can be categorised into four different types: neglect, emotional abuse, physical abuse and sexual abuse. A child may be subjected to one or more forms of abuse at any given time.

7.1 Neglect

Neglect can be defined in terms of an omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, and/or medical care.

Harm can be defined as the ill-treatment or the impairment of the health or development of a child. Whether it is significant is determined by the child's health and development as compared to that which could reasonably be expected of a child of similar age.

Neglect generally becomes apparent in different ways over a period of time rather than at one specific point. For example, a child who suffers a series of minor injuries may not be having his or her needs met in terms of supervision and safety. A child whose height or weight is significantly below average may be being deprived of adequate nutrition. A child who consistently misses school may be being deprived of intellectual stimulation. The threshold of significant harm is reached when the child's needs are neglected to the extent that his or her wellbeing and/or development are severely affected.

7.2 Emotional Abuse

Emotional abuse is normally to be found in the relationship between a parent/carer/teacher and a child rather than in a specific event or pattern of events. It occurs when a child's developmental need for affection, approval, consistency and security are not met. Unless other forms of abuse are present, it is rarely manifested in terms of physical signs or symptoms. Examples of emotional abuse of children include:

- (a) the imposition of negative attributes on a child, expressed by persistent criticism, sarcasm, hostility or blaming;
- (b) conditional parenting in which the level of care shown to a child is made contingent on his or her behaviours or actions;
- (c) emotional unavailability of the child's parent/teacher;
- (d) unresponsiveness of parent/teacher and/or inconsistent or inappropriate expectations of the child;
- (e) failure to show interest in, or provide age-appropriate opportunities for the child's cognitive and emotional development;
- (f) use of unreasonable or over-harsh disciplinary measures;

(g) exposure to domestic violence;

(k) exposure to inappropriate or abusive material through new technology.

Emotional abuse can be manifested in terms of the child's behavioural, cognitive, affective or physical functioning. Examples of these include insecure attachment, non-organic failure to thrive, unhappiness, low self-esteem, educational and developmental underachievement, and oppositional behaviour. The threshold of significant harm is reached when abusive interactions dominate and become typical of the relationship between the child and the parent/carer/teacher.

7.3 Physical Abuse

Physical abuse of a child is that which results in actual or potential physical harm from an interaction, or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents. Physical abuse can involve:

- (a) severe physical punishment;
- (b) beating, slapping, hitting or kicking;
- (c) pushing, shaking or throwing;
- (d) pinching, biting, choking or hair-pulling;
- (e) terrorising with threats;
- (f) observing violence;
- (g) use of excessive force in handling;
- (h) deliberate poisoning;
- (i) suffocation;
- (j) fabricated/induced illness
- (k) allowing or creating a substantial risk of significant harm to a child.

7.4 Sexual Abuse

Sexual abuse occurs when a child is used by another person for his or her gratification or sexual arousal, or for that of others.

The Protection of Children from Sexual Offences (POCSO) Act 2012, addresses crimes of sexual abuse and sexual exploitation of children. The Act prescribes the following sexual offences against children –

1. Penetrative sexual assault
2. Aggravated penetrative sexual assault
3. Sexual assault
4. Aggravated sexual assault
5. Sexual harassment
6. Using a child for pornographic purposes.

Examples of child sexual abuse include the following:

- (a) exposure of the sexual organs or any sexual act intentionally performed in the presence of the child;
- (b) intentional touching or molesting of the body of a child whether by a person or object for the purpose of sexual arousal or gratification;
- (c) masturbation in the presence of the child or the involvement of the child in an act of masturbation;
- (d) sexual intercourse with the child whether oral, vaginal, or anal;
- (e) sexual exploitation of a child includes inciting, encouraging propositioning, requiring or permitting a child to solicit for, or to engage in, prostitution or other sexual acts. Sexual exploitation also occurs when a child is involved in the exhibition, modelling or

posing for the purpose of sexual arousal, gratification or sexual act, including its recording (on film, video tape or other media) or the manipulation, for those purposes, of the image by computer or other means.

It may also include showing sexually explicit material to children which is often a feature of the “grooming” process by perpetrators of abuse;

(f) consensual sexual activity involving an adult and an underage person. At present, the age of consent in India is 18 years with both the POCSO Act and the Criminal Law Amendment Act (anti-rape law) recognizing persons below 18 years as minors.

In all cases where the school becomes aware of underage sexual intercourse, the school should take appropriate steps to inform the child’s parents.

8. SIGNS AND SYMPTOMS

Child neglect or abuse can often be difficult to identify and may present in many forms. No one indicator should be seen as conclusive in itself of abuse. It may indicate conditions other than child abuse. All signs and symptoms must be examined in the total context of the child's situation and family circumstances.

Particular behavioural signs and emotional problems suggestive of child abuse in **young children (aged 0-10 years)** include:

- mood change, e.g. child becomes withdrawn, fearful, acting out;
- lack of concentration, especially in a educational setting;
- bed wetting, soiling;
- pains, tummy aches, headaches with no evidence of physical cause;
- skin disorders;
- reluctance to go to bed, nightmares, changes in sleep patterns;
- school refusal;
- separation anxiety;
- loss of appetite, overeating, hiding food.

Particular behavioural signs and emotional problems suggestive of child abuse in **older children (aged 10+ years)** may include:

- depression, isolation, anger;
- running away;
- drug, alcohol, solvent abuse;
- self-harm;
- suicide attempts;
- missing school or early school leaving;
- eating disorders.

8.1 Signs and symptoms of sexual abuse

Child sexual abuse often covers a wide spectrum of abusive activities. Cases of sexual abuse principally come to light through:

- (a) disclosure by the child or his/her siblings or friends;
- (b) the suspicions of an adult;
- (c) physical symptoms.

It is important to note that physical signs may not be evident in cases of sexual abuse due to the nature of the abuse and/or the fact that the disclosure was made some time after the abuse took place.

Parents, carers and professionals should be alert to the following physical and behavioural signs:

- bleeding from the vagina/anus;
- difficulty/pain in passing urine/faeces;
- an infection may occur secondary to sexual abuse, which may or may not be a definitive sexually transmitted disease. Professionals should be informed if a child has a persistent vaginal discharge or has warts/rash in genital area;

- noticeable and uncharacteristic change of behaviour;
- hints about sexual activity;
- age-inappropriate understanding of sexual behaviour;
- inappropriate seductive behaviour;
- sexually aggressive behaviour with others;
- uncharacteristic sexual play with peers/toys;
- unusual reluctance to join in normal activities that involve undressing, e.g. games/ swimming

9.Children who may be particularly vulnerable

Some children are at increased risk of neglect and/or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion and communication issues. Children who are differently abled or have special educational needs will be given special consideration to ensure that all of our children receive equal protection.

The Rights of Persons With Disabilities Act (RPWD), 2016 lists measures to protect persons with disabilities from all forms of abuse, violence and exploitation. Section 8 (1) of the Act states that persons with disabilities shall have equal protection and safety in situations of risk, armed conflict, humanitarian emergencies and natural disasters.

The 21 disabilities mentioned in the Act are:

1. Blindness
2. Low-vision
3. Leprosy Cured persons
4. Hearing Impairment (deaf and hard of hearing)
5. Locomotor Disability
6. Dwarfism
7. Intellectual Disability
8. Mental Illness

9. Autism Spectrum Disorder
10. Cerebral Palsy
11. Muscular Dystrophy
12. Chronic Neurological conditions
13. Specific Learning Disabilities
14. Multiple Sclerosis
15. Speech and Language disability
16. Thalassemia
17. Hemophilia
18. Sickle Cell disease
19. Multiple Disabilities
20. Acid Attack victim
21. Parkinson's disease

Under Chapter III, Section 16 of the RPWD Act, it is the duty of the educational institution to provide inclusive education to children with disabilities and towards this end shall:

- ensure necessary individualised support,
- make building, campus and various facilities accessible,
- detect specific learning disabilities in children at the earliest and take suitable measures to overcome them,
- ensure equal opportunities in education, sports and recreational activities,
- ensure safe transportation facilities are provided to children with disabilities, and
- monitor the participation and progress of children with disabilities towards maximising academic and social development consistent with the goal of full inclusion.

Section 17 (1) of **The Right to Education Act, 2009**(further amended in 2012 and 2017) states that no child admitted in a school shall be subject to physical punishment or mental harassment. Chapter V, Section 29 emphasises that schools should make children free of fear, trauma and anxiety and help them to express their views freely. Under Section 9 of the Act, the educational institution shall ensure that a child belonging to a weaker section or a disadvantaged group is not discriminated against and prevented from completing elementary education on any grounds.

The **POCSO Act 2012** (section 26 and 38 in particular) lays down stringent procedures for recording the statement of a child with disabilities and recommends the provision of an interpreter, a special educator or any other experienced professional to communicate with the child.

9.1 Children Who Sexually Abuse Others or Display Sexually Harmful Behaviour

When abuse of a child is alleged to have been carried out by another child, the procedures outlined in this policy will be followed. It is important in such situations to distinguish between behaviours which are experimental in nature and those that are exploitative and harmful. Advice and support will be sought in such circumstances from the School's Mental Health Professionals. In all such cases a risk assessment will be undertaken and an individual support and safety plan identified. Appropriate services will also be provided for the children involved.

9.2 Young Person whose Behaviour places him/her at Risk of Significant Harm:

A child whose own behaviours e.g. self-harming behaviour or suicidal ideations, places him/her at risk of significant harm, may not necessarily constitute abuse. However, steps to be taken to protect the child/young person, are as follows:

1. An incident of self harm, seen or heard, by the teacher, should immediately be brought to the attention of the Mental Health Professional in the Counselling Centre.

2. A student's suicidal ideations or attempt should trigger a referral by the Counsellor to a Psychiatrist for screening. The counsellor will follow up on the Psychiatrist's diagnosis and recommendations.
3. Despite counselling and gentle persuasion, where parents resist referral to the Psychiatrist, advice should be put in writing to the parents, either in a letter or an email and parents' acknowledgement sought.
4. The Mental Health Professional in the school/college would a) psycho-educate the student and the family; b) enhance the student's problem-solving skills and social skills; c) help the young person identify his negative thoughts and then develop and utilize positive thoughts to counter them through cognitive restructuring.
 - a) Supportive interventions in the school/college will involve sensitizing teachers to the stressors that the young person can experience in their daily lives and to look out for warning signs of depression and suicide.
 - b) The counsellor will raise general awareness among students and teachers of the risk factors associated with suicide through awareness drives and life-skills programmes. Peer support will also be encouraged.

10. DEALING WITH DISCLOSURES OF ABUSE

10.1 Procedure For A Parent To Report A Concern Or A Complaint:

Primarily in the Indian context, children are likely to disclose abuse to their parents. If the disclosure implicates any school personnel, the parent is advised to:

- 1) Seek an immediate meeting with the school Principal, or the management in the absence of the Principal.

- 2) The Principal/Management will involve the Head of the Counselling Centre.
- 3) The Principal/Management/Counsellor will follow the procedure as in section 11 of this policy and keep the parent informed of the process.

10.2 DEALING WITH STUDENT DISCLOSURES TO A MEMBER OF STAFF

An abused child is likely to be under severe emotional stress and a member of staff may be the only adult whom the child is prepared to trust. Great care shall be taken not to damage that trust.

The following are guidelines for use by staff should a child disclose concerns of a child protection nature.

Receive – It is important to deal with any allegation of abuse or neglect in a sensitive and competent way through listening to and facilitating the child to tell about the problem, rather than interviewing the child about details of what happened. Listen to what the child says, without displaying shock or disbelief. Accept what is said, making brief cursory notes. These notes should be retained.

Reassure- The member of staff will need to reassure the child, and endeavour to retain his or her trust, while explaining the need for action which will necessarily involve other adults being informed. It is important to tell the child that everything possible will be done to protect and support him/her, but not to make promises that cannot be kept e.g. promising not to tell anyone else.

Respond- When information is offered in confidence, the member of staff will need tact and sensitivity in responding to the disclosure. The child should not be questioned unless the nature of what he/she is saying is unclear. Leading questions should be avoided – this may invalidate your evidence and the child's in any later court proceedings. Explain what you have to do next and to whom you have to talk.

Record- make notes at the time and write these up as soon as possible afterwards. Note the time, date, place, people present as well as what is seen and said. Record key phrases/words used, noticeable non-verbal behaviour and any physical injuries. Do not destroy original notes. [See Appendix 1]

Report- refer the matter to the Principal. Respect confidentiality i.e. the matter should only be discussed on a need to know basis.

Any disclosure from a child, raised by a parent should be reported to the school Principal and Head of the Counselling Centre.

11. REPORTING A CASE OF CHILD SEXUAL ABUSE (CSA) TO THE POLICE:

Under Section 19.1 of the POCSO Act, 2012, any person who has apprehension that an offence is likely to be committed or has knowledge that an offence has been committed should bring the incident to the notice of the Special Juvenile Police Unit (SJPU) or the local police.

Failure to report such an offence, is punishable with imprisonment of up to six months or fine or both. Investigations will follow.

Any person, being in charge of the educational institution, i.e. Principal or the Management, who fails to report the commission of an offence under section 19.1 of the POCSO Act, in respect of the subordinate under his/her control, shall be punished with imprisonment for a term which may extend to one year and with a fine.

As per the POCSO Act, the child should be taken immediately for a medical examination. The examination must be conducted by a registered medical practitioner at a government hospital within 24 hours from the time of receiving information about an offence.

The school authorities' co-operation with the police and medical investigation and in providing documentary evidence, should be unconditional and prompt.

12. STAFF TRAINING

It is important that all staff (employed and contractual) have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff will receive training during their induction. All staff, Principals and Management will be required to undergo training and education on Child Protection laws, procedures and practices.

The school should also be alert to the possibility of students harming themselves, for example through cutting, or misuse of substances as well as forms of self-harm related to anorexia and bulimia.

- Every employee, existing and newly recruited, will need to sign a Code of Conduct in conjunction to this policy. (See Appendix 2). The signed copy will be retained in the employee file held by the institution's Human Resource Department.
- All Shadow Teachers for children with special needs, will also be expected to sign and adhere to the Code of Conduct. The signed copy will be retained in relevant file held by the Counselling Centre.
- All management, teaching and non teaching staff, contractual staff and volunteers will be required to read and commit to the child protection policy.
- All management, staff and volunteers will be encouraged to attend Stay Safe Training Programme and other relevant training as identified.

13. ALLEGATIONS AGAINST STAFF

The Institution's procedures for dealing with allegations against staff (and volunteers who work with children) aim to strike a balance between the need to protect students from abuse and the need to protect staff and volunteers from false or unfounded allegations. Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the students or student concerned; and
- the need for a full and fair investigation.

Where an allegation or complaint is made against a member of school personnel, the matter should be reported immediately to the Co-ordinator/HM, who in turn should immediately inform the Principal and Management. The Head of the Counselling Centre needs to be involved and procedures laid out under the POCSO Act need to be strictly followed.

Detailed guidance and training should be imparted to staff at regular intervals to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student.

14. DEALING WITH FALSE ALLEGATIONS

The POCSO Act, 2012 makes it an offence to report false information, when such report is made other than in good faith. It states that any person, who makes false complaint or provides false information against any person, in respect of an offence committed under sections 3, 5, 7 and section 9, solely with the intention to humiliate, extort or threaten or defame him / her, shall be punished with imprisonment for a term which may extend to six months or with fine or with both.

15. STAY SAFE PROGRAMME

The Stay Safe programme of the school plays a pivotal role in helping children develop the skills necessary to enable them to recognize and resist abuse and potentially abusive situations. Every year a mandatory workshop on 'Good and Bad Touch: Stay Safe' is done with all students, in a manner appropriate for their age. An awareness programme with parents, on child-safety measures will complement student empowerment. Regular feedback from students about their safety in school will also be sought, either written or verbal, and as may be age-appropriate.

A skill-enhancement programme on awareness of child abuse and protective measures was imparted this year with personnel at all levels – support staff (peons), bus personnel, canteen staff, housekeeping staff and security personnel. It is intended that this be a rolling programme because of turnover of staff in this cadre.

The School will operate robust and sensible safety procedures. The school will take practical steps to ensure that the school premises are as secure as circumstances permit. The security manager and his personnel is advised on child safety measures. CCTV cameras are fitted on every floor and will be monitored closely by the security manager and his trained staff.

16. RECORD KEEPING AND CONFIDENTIALITY

It is the policy of Bunts Sangha's S.M. Shetty Educational Institutions, to keep confidential all personal information about the families, children and staff of the institution. However, an exception to this is when child protection concerns arise, in which case the institution cannot keep such information secret. In this situation information will be shared on a 'need to know' basis in the best interest of the protection and welfare of the child. Sharing of information for the protection of child is not a breach of confidentiality or data protection.

1. If a student discloses abuse of any nature, especially of a sexual nature, action will be taken to first ensure that the student comes to no serious harm.
2. If this disclosure is to a member of staff, it is the responsibility of the staff to inform the student of disclosure of this information to significant others (Counsellor and Principal) solely with the objective of safeguarding the child.
3. The Counselling Centre will keep up to date and accurate records of all children who are provided a service from the Centre.

4. The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children.
5. The School will cooperate with the police to ensure that all relevant information (including CCTV footage) is shared for the purposes of child protection investigations.
6. Management, staff, volunteers, in this service are advised of our confidentiality policy and are required to sign up to it.

17. INSTITUTIONAL RESPONSIBILITIES:

Management and Principals will ensure that -

- 1) All staff (employed and outsourced) adhere to the institution's Child Protection Policy.
- 2) The Child Protection Policy is integrated with Human Resources policies.
- 3) An orientation on Child Protection issues is arranged for all new recruits.
- 4) All school personnel (teaching, non-teaching, office staff, housekeeping, security, bus personnel, canteen staff, and sports instructors) attend regular training sessions on child protection issues, procedures, guidelines and legislation.
- 5) A teacher training module is in place to empower teachers to recognize suspicious behaviour, create a safe environment for students and be aware of legal recourses in case of something happens.
- 6) CCTV cameras (in school and buses) are monitored live at all times.
- 7) A written policy document on all the security procedures is maintained for accountability; spot checks to be carried out to ensure functional security systems are in place.
- 8) Background checks and verification of all school personnel is in accordance with the Supreme Court Order for Safety of Schools, 2009
- 9) The school follows the Maharashtra Motor Vehicles (Regulations for School Buses), Rules 2011, irrespective of owning the buses or running contracted bus services.

- 10) Two security guards and four housekeeping attendants are present on each floor.
- 11) College students are not allowed in washrooms meant for school students
- 12) Separate washrooms for visitors, bus drivers, attendants, and that they are not permitted to use washrooms meant for students.
- 13) Regular and effective fumigation and pest-control in the school premises, to ensure students' good health and hygiene, as an integral part of their safety.
- 14) No visitor is allowed inside the school premises without valid permission; and all visitors (parents, guests, etc) are screened and their belongings checked before allowed inside the school.

18. PARENTAL RESPONSIBILITIES:

It is mandatory for parents to carry their Parent/Escort Cards issued by the school, at all times when coming for Open Days or for any meetings with staff or when picking up their child from school. Failure to produce the same will result in parents being sent back home and no altercation or negotiation with the security guard will be entertained.

Parents are requested to:

- Be vigilant as a parent and a citizen, about any adult that might seem to be making your child or any child for that matter, feel or look "uncomfortable".
- Pay heed to any sudden behavioural changes in your child.
- Make sure your children have your address and phone numbers handy and know how to ask for help if they are lost or alone.
- Talk to your children about good touch and bad touch; tell them what private parts are, and how they should not allow anyone to touch them.
- Keep all channels of communication open. Let your child know that they should immediately come to you if anybody makes them feel uncomfortable or if they are not sure about something.

19. WHISTLEBLOWING:

All staff are required to report to the Principal, or the Management in the Principal's absence, any concern or allegations about school practices or the behaviour of colleagues or other staff which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

20. MONITORING AND EVALUATION:

The problems and difficulties being faced by children today may change over time. Current challenges may be overcome and new issues could emerge that require new approaches not covered by this policy. This necessitates that the policy be an evolving document that is periodically reviewed both in approach and implementation methods. Compliance with the policy will be monitored on an on-going basis jointly by Principals and the Counselling Centre; it will be reviewed annually and report to Management.



21. HELPLINES

School Counselling Centre: 022 61327344/345/340/341 (7.30a.m. to 4.00p.m.)

Childline: 1098 (24 hours)



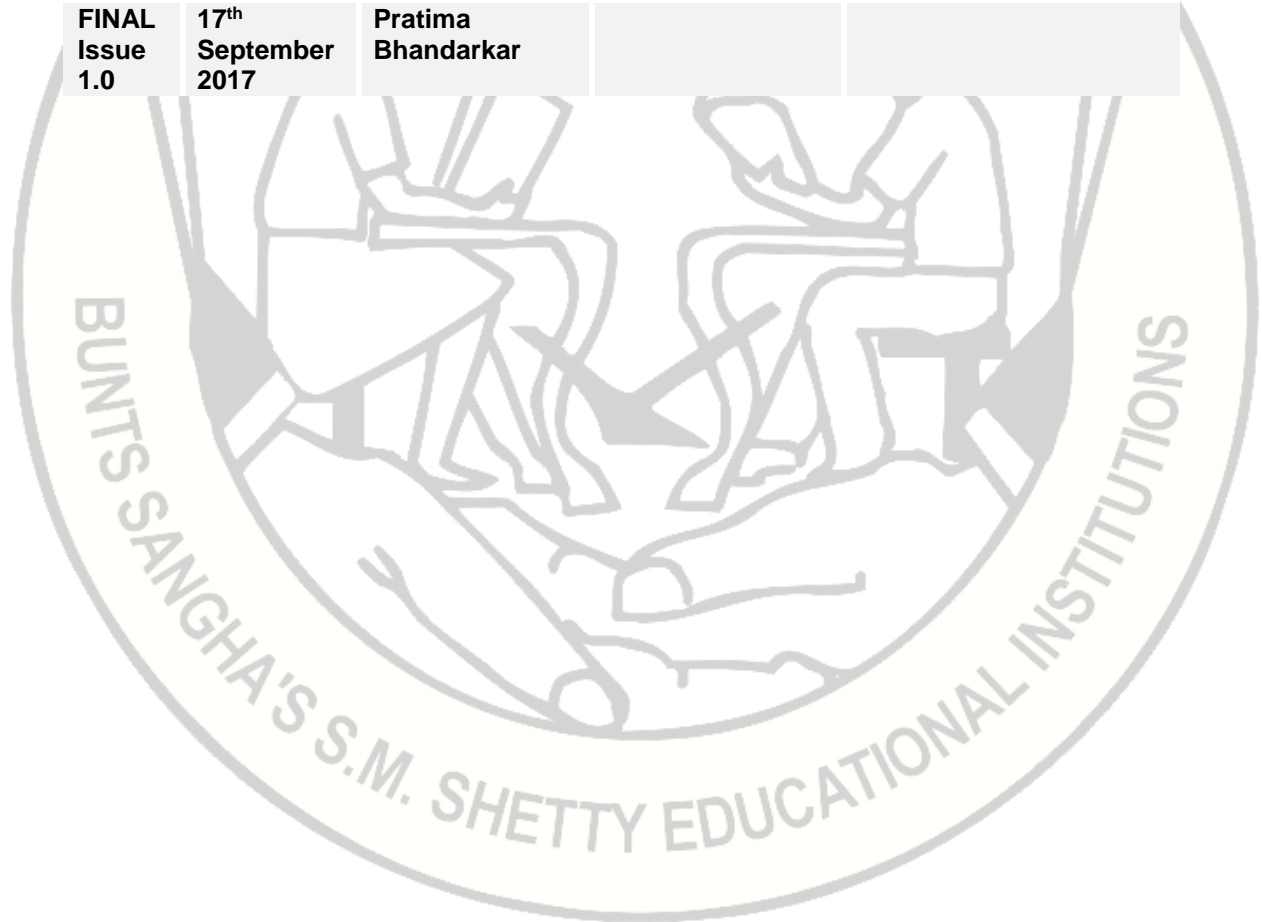
22. REFERENCES:

1. Protection of Children Against Sexual Offences, POCSO Act, 2012:
<http://wcd.nic.in/sites/default/files/childprotection31072012.pdf>
2. Rights of Persons with Disabilities Act, 2016:
<http://www.disabilityaffairs.gov.in/upload/uploadfiles/files/RPWD%20ACT%202016.pdf>
3. Right to Education Act, 2009: www.mhrd.gov.in/rte
4. Advisory/Guidelines under Section 35 (1) of the Right of Children to Free and Compulsory Education (RTE) Act, 2009 for elimination of Corporal Punishment in schools. Ministry of Human Resources Development, Government of India. http://harprathmik.gov.in/pdf/rte/Advisory_for_Eliminating_Corporal_Punishment_in_Schools_under_Section_35_new.pdf 26th March 2014
5. “Child Protection: A Handbook for Teachers” – Ministry for Women and Child Development, Government of India, 2006
6. Child Protection Policy: A must in all schools. <http://childlineindia.org.in/Child-Protection-Policy-in-all-schools.htm>
7. Sample Child Protection Policy:
<http://www.stpaulspsirvinestown.com/cmsfiles/items/downloads/ChildProtectionPolicy.pdf>
8. (2013) Ministry of Women and Child Welfare, Model Guidelines under Section 39 of POCSO Act, 2012. http://www.slsatripura.in/Downloaded/POCSO_Model_Guidelines_17_11_2016.pdf



23. DOCUMENT HISTORY

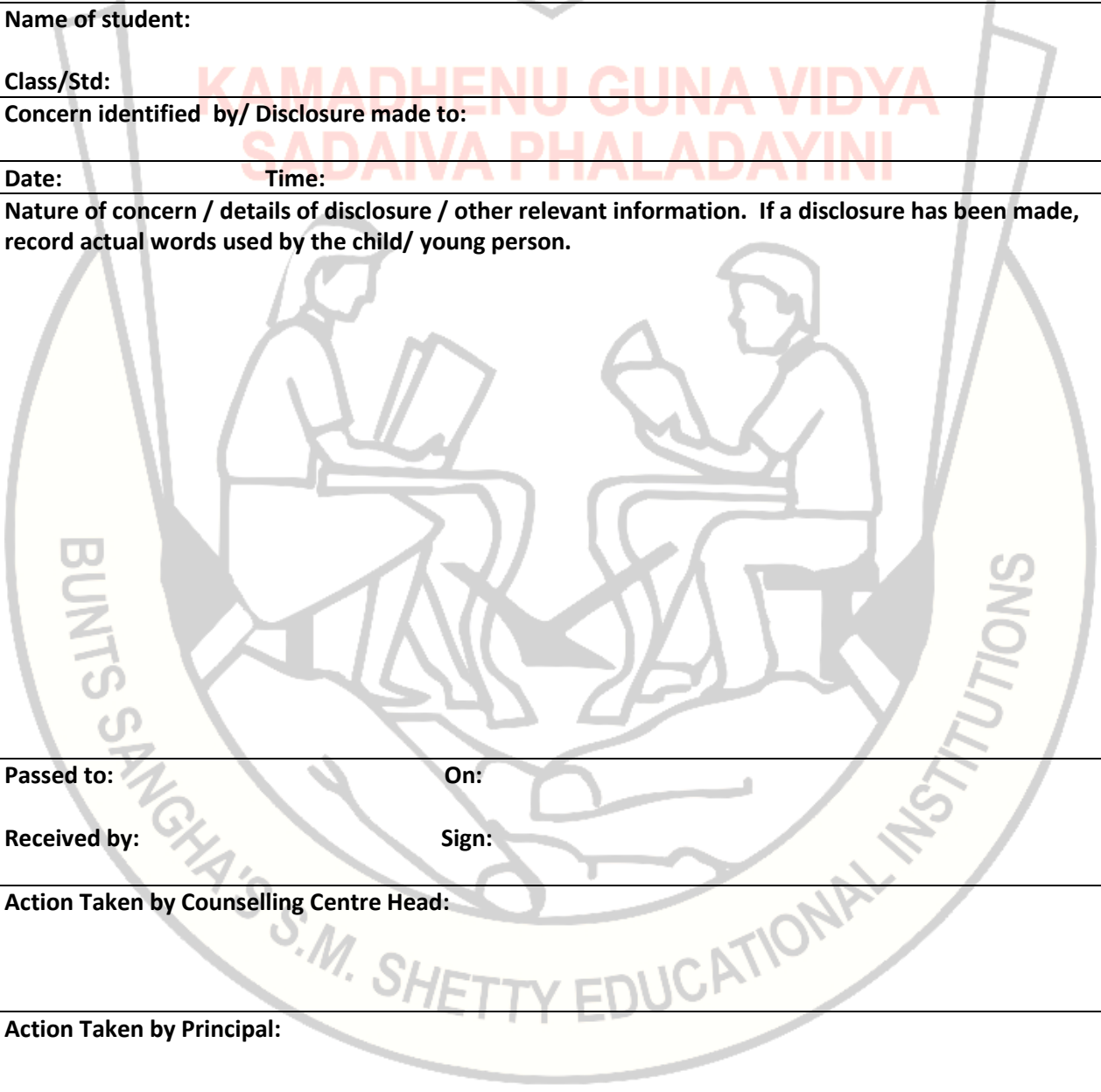
Version	Date	Author(s)	Reviewed By	Nature of Changes
Draft 0.1	31 st August 2017	Pratima Bhandarkar	Dr. Harish Shetty, Management, Principals, HR and Counselling Centre	First Draft Version circulated for review.
Draft 0.2	13 th September 2017	Pratima Bhandarkar	Dr. Harish Shetty	Second Draft Version: Addition of Children's Voices after focus group discussions.
Draft 0.3	15 th September 2017	Pratima Bhandarkar	Principals and Management	Third Draft version Institutional and Parental Responsibilities
Draft 0.4	16 th September	Pratima Bhandarkar	Dr. Harish Shetty	Fourth Draft Version: RTE Act and Rights of PWD Act
FINAL Issue 1.0	17th September 2017	Pratima Bhandarkar		



Appendix 1

BUNTS SANGHA'S S.M. SHETTY EDUCATIONAL INSTITUTIONS, POWAI

CHILD PROTECTION RECORD OF CONCERN OR DISCLOSURE

Name of student:	
Class/Std:	
Concern identified by/ Disclosure made to:	
Date:	Time:
Nature of concern / details of disclosure / other relevant information. If a disclosure has been made, record actual words used by the child/ young person.	
	
Passed to:	On:
Received by:	Sign:
Action Taken by Counselling Centre Head:	
Action Taken by Principal:	

Appendix 2

BUNTS SANGHA'S S.M. SHETTY EDUCATIONAL INSTITUTIONS

CHILD PROTECTION CODE OF CONDUCT

I, _____ acknowledge that I have read and understood Bunts Sangha's S.M. Shetty Educational Institutions' Child Protection Policy. In my capacity of a teaching/non-teaching staff of the Institution, I must and will:

- Treat children and young people with respect and value their ideas and opinions regardless of gender, language, religion, caste, political or other opinion, ethnic or social origin, disability, birth or other status;
- Not use physical punishment on children;
- Not use inappropriate language in the presence of children;
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- No be alone with a child unnecessarily and for more than a very short time;
- Not arrange contact, including online contact, with children outside of the school's activities;
- Not use any computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium;
- Not work with children while under the influence of alcohol or illegal drugs;
- Comply with all relevant Indian Child protection legislation;
- Prioritise, attend and participate in any training organized by the institution, related to safeguarding children;
- Immediately report concerns I may have about the welfare or a child or feel someone is behaving inappropriately around children;
- Immediately disclose all charges, convictions and other outcomes of an offence, that relate to child exploitation and abuse, which occurred before or occurs during my association with the institution.

When photographing or filming a child or using children's images, for work-related purposes, I must:

- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this, I must explain how the photograph or film will be used;
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- Ensure images are honest representations of the context and the facts;
- Ensure file labels, data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form;

I understand that the onus is on me, as a person associated with the institution, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

I understand that if I breach this Code of Conduct, I will face disciplinary action, including and up to termination of employment.

I declare that I do not have any police record in relation to child abuse, neglect or exploitation. I confirm that I have not been charged with any offence that is incomplete or awaiting legal action.

Signature: _____

Date: _____

ANNEXURE:

ANTI- BULLYING POLICY

Bunts Sangha's S.M. Educational Institutions, firmly believes that all students have a right to a safe and healthy school environment. All students have the right to be educated in an atmosphere which is free from fear. This is a fundamental right enshrined in the UN Convention on the Rights of the Child and the Human Rights Council.

In this regard, the school prohibits acts of bullying, harassment and other forms of aggression and violence. Bullying is unwanted, aggressive behaviour among school-aged children that involves a real or perceived power imbalance. Bullying includes actions such as making threats, spreading rumours, attacking someone verbally or physically and excluding someone from a group on purpose. Bullying or harassment interferes with both, the school's ability to educate its students and a student's ability to learn.

- The school has a no-tolerance policy towards bullying or harassment, whether it takes place on or off school property, at any school-sponsored function (like picnics) or in a school vehicle or at any time or place where a child's imminent safety or overall well being may be an issue.
- All administrators, management, teaching and non-teaching staff, parents and students are expected to refuse to tolerate bullying and harassment and to demonstrate behaviour that is respectful and civil.
- Bullying or harassment can be **directly** from the bully to the victim (e.g. through physical intimidation, threats or attacks, verbal abuse, unwanted attention and advances, damaging property) or it can be **indirect** (e.g. through spreading malicious rumours). It can include **cyber-bullying** (e.g. sending unpleasant SMS messages, photographs or emails, to the victim or to the others). It can also include **identity-based bullying**, i.e. prejudice based upon religion, gender, sexual orientation, gender identity, mental, physical or sensory disability or impairment or special educational needs.
- Bullying or harassment also includes forms of retaliation against individuals who report or cooperate in an investigation under this policy.
- A Behaviour & Attitude Transformation (BAT) team has been constituted in the State-Board school, consisting of a core group of 6 teachers to address any grievances related to bullying or harassment of a student.
- Staff and students who witness acts of bullying shall take immediate steps to intervene when safe to do so. Students witnessing or experiencing bullying are strongly encouraged to report the incident to the BAT team (State board) or Co-ordinators (International Board); such reporting will not reflect on the target or witnesses in any way.
- False reporting of bullying will also incur disciplinary measures.
- The BAT team/ Co-ordinators will be working together with the Principal and Counsellor of the school on sensitization, intervention and prevention of bullying in the school. Recording of the reported incident and subsequent investigative meetings and recommendations will be clearly documented.
- The effectiveness of the anti-bullying policy will be reviewed periodically.

DISCIPLINARY PROCESS AND CONSEQUENCES

1. Referral to Counsellor, Principal depending on severity of bullying
2. A meeting of school personnel and parents to consider the behaviour and/or progress of the student and make recommendation
3. Time-out: removal of student from class for a stipulated period
4. Withdrawal of privileges; restricted participation in school activities
5. Detention of student after school hours
6. School Behaviour agreement with student/parent: A written statement listing steps to be taken to improve behaviour. The statement will also describe the support to be provided by school staff and/or parent as well as the date when the contract will be reviewed.
7. School/community service: Assignment of student to perform school/community service
8. Student's participation in guided reflection process designed to teach alternative behaviour
9. Expulsion in the rarest of rare cases (involving any form of physical abuse/violence), when all the above have failed.

EDUCATION AND PREVENTIVE STRATEGIES

- ✓ School-wide Psycho-educational training workshops aimed at building empathy, respect and resilience in students.
- ✓ Display key respect messages in classrooms, in assembly areas and around the school. Involve pupils in the development of these messages.
- ✓ Have a system of encouragement and rewards to promote desired behaviour and compliance with the school rules and routines. Notice and acknowledge desired respectful behaviour by providing positive attention.
- ✓ The school will ensure that the post-bullying atmosphere is calmed down. The school will be cautious that neither the victim nor the bully is branded and that he/she is given opportunities for change.



Family values play a crucial role in the emotional and psychological well being of a child. Parents are motivated to support the school in bullying-prevention efforts.

I/we have understood the Anti-Bullying Policy and support the school in this initiative.

Student: _____ Parent 1): _____ Parent 2): _____

Name: _____ Date: _____