

CHILD PROTECTION POLICY (CPP)

Introduction

VSPK International School (hereinafter known as the ‘School’) promotes holistic school safety, where every student has a right to a protective environment, free of violence, harassment, abuse and neglect, and based on respect for the child.

We believe that the welfare of children is the highest priority and that it is the responsibility of everyone to ensure that they are protected. A child-centric rights-based approach, affirmed by India's commitments to the UN Convention on the Rights of the Child, is deeply embedded as the guiding framework for this CPP.

This CPP is a comprehensive set up of guidelines that define our commitment to safeguard children from harm and abuse. This helps to create a safe and positive environment for children and lays down the roles and responsibilities of all stakeholders.

Scope of CPP

The School follows a ‘zero tolerance’ approach to any act of violence, bullying, sexual abuse etc., in the school premises, school buses and such extended environments, as defined in this CPP.

This CPP covers abuse, harassment, and offenses that can occur in school campus and in premises under control of the Institution, as well as extended environments including the modes of transport.

This CPP comprises key elements to guide behavior and practices of personnel and individuals in relation to the School such as prevention of abuse, complaint mechanisms and response, recruitment, disciplinary action for misconduct, monitoring and review etc.

Applicability

This CPP aims to protect students and applies to all School Staff/ Teachers/ Visitors/ Parents/ Visiting Faculty/ Third Party Service Providers who directly interact with students.

Conformity with Laws in force in India

This CPP is guided by the existing legal frameworks of child protection in India and the ratified international conventions.

This CPP is in conformity with all relevant laws in force in India such as Protection of Children from Sexual Offences Act, 2012, The Indian Penal Code, 1860, The Juvenile Justice (Care and Protection of Children) Act, 2015 and The Information Technology Act, 2000, The Right of Children to Free and Compulsory Education Act, 2009 and shall include any subordinate or delegated legislation made from time to time.

In the event, any part of this CPP is contrary to any law(s) in force, such part shall be deemed to be null and void.

In the event this CPP does not cover any legal compliance requirement on the subject of child protection, the same shall be deemed to be a part of this CPP and the School shall be duty-bound to follow the same.

Any modifications made to the relevant laws from time to time such as amendments, substitutions etc. shall be deemed to be a part of this CPP and the School shall be duty-bound to follow the same.

Any term not defined in this CPP, shall bear the meaning given to it under the relevant applicable law.

Definitions

“Child” means a student admitted and enrolled in the School located anywhere in India;

“Child Abuse” is any deliberate behaviour or action which includes all forms of physical, emotional, online and sexual abuse that results in actual or potential harm to the child’s health, development or dignity and endangers child safety;

“Cyber Bullying” means any form of intimidation or harassment, using a computer, communication device or computer network or the Internet;

“Mental Harassment” means and includes insults, ridicule, humiliation, name-calling and repeated threats to cause physical violence to a child;

“Penal Offence” means any offence that is punishable under the law with corporal punishment and/ or fine, such as, offences defined and punishable under the Indian Penal Code, 1860 and/ or POCSO Act, 2012 and/or the Juvenile Justice Act or any other law in force on the date of the incident;

“Physical Violence” means any act or conduct which is of such a nature so as to cause bodily pain, harm, or danger to life, limb, or health or impair the health or development of the child;

“Bullying” or “Ragging” means any disorderly conduct whether by words spoken or written or by an act which has the effect of teasing, treating or handling with rudeness any other student, indulging in rowdy or undisciplined activities which causes or is likely to cause annoyance, hardship or psychological harm or to raise fear or apprehension thereof in a fresher or a junior student or asking the students to do any act or perform something which such student will not do in the ordinary course and which has the effect of causing or generating a sense of shame or embarrassment so as to adversely affect the physique or psyche of a fresher or a junior student.

“Sexual Assault” has the same meaning as assigned to it in Section 7 of POCSO Act, 2012;

“Sexual Harassment” has the same meaning as assigned to it in Section 11 of POCSO Act, 2012;

“Stalking” means following a child and contacting or attempting to contact such child to foster personal interaction repeatedly despite a clear indication of disinterest by such child; or monitoring the child by internet, email or any other form of electronic communication.

Offences and other Acts covered under this CPP

The following offences and acts constitute the cause of action for making a complaint under this CPP:

- a) Cyber Bullying
- b) Cyber Stalking
- c) Mental Harassment
- d) Penal Offenses
- e) Physical Violence
- f) Ragging / Bullying

g) Sexual Assault

h) Sexual Harassment

i) Stalking

The aforesaid acts are defined in the Definitions clause.

It is clarified that the aforesaid acts and offenses are not mutually exclusive to each other but are overlapping with one another, and shall be dealt with in addition to one another.

Complaint of an Offense

A complaint in writing by a student and/ or parent(s) of such student complaining of any act that constitutes a penal offense under the law may be handed over to either of the following persons:-

a) Any teacher

b) Counselor

c) School Principal/Vice Principal

d) Child Protection Officer

In the event the complaint constitutes an offence under POCSO Act (The Protection of Children from Sexual Offences Act, 2012), the same shall be forwarded to the Student Safety Committee and the procedures as established by the Student Safety Committee shall be followed.

With respect to offenses under POCSO, the School is duty bound to report the offense to the concerned law enforcement agencies in terms of Section 19 and Section 21 of the Act.

Where the complaining student and/ or parent(s) of such student, is of the view that the complaint constitutes a penal offense and should be forwarded to the concerned law enforcement agency, the School shall forward the same to the concerned law enforcement agency.

The School will cooperate with the concerned law enforcement agencies inquiring into and/ or investigating complaints of penal offense(s).

In the event the complaint does not fall within sub-clause 2 and 4 above, the complaint shall be dealt with by the Disciplinary committee and procedures as established by the Disciplinary Committee shall be followed.

Complaint Redressal Mechanism for Child Sexual Abuse Cases

If a person has knowledge that an offense has been committed or belief or apprehension that an offense is likely to be committed must report to any member of the Student Safety Committee (SSC) or any senior member of the School.

Such persons as stated above should not conduct their own investigation or look into the matter. There should not be any delay in reporting the matter to the Student Safety Committee (SSC) or any senior member of the School.

The Student Safety Committee must hold a meeting and immediately report the matter to the local police/ Special juvenile police unit/ Child helpline 1098/ State commission for protection of child rights.

Minutes of the meeting should be maintained and signed by all members. A copy of the same should be shared with the authorities.

When the matter is closed or withdrawn for any reason whatsoever, the School must prepare a post incident report/ closure report.

Code of Conduct

All staff members, external personnel and visitors shall follow the prescribed Code of Conduct to safeguard the child from any incidence of abuse. In the event, a legislation or subordinate legislation prescribes any code of conduct for school staff, the school shall abide by the same in addition to the code provided below.

Code of Conduct for the Staff

1. Be conscious of and respect the privacy and dignity of each and every child.
2. Be visible and not in a secluded place, while in contact with children at the workplace.
3. Respect and encourage children's voice and views.
4. Educate children about their rights, issues of abuse, neglect and exploitation.
5. Be affectionate, caring and understanding to the requirements and needs of the children.
6. Be responsive in case any special need of the child arises such as health issues or emotional support.
7. Have a sense of accountability, in order to deter any poor practice or potentially abusive behavior.
8. Immediately report any suspicious behavior/suspected occurrence of abuse. It is a criminal offence to conceal or abet incidents of child abuse, and is mandatory to report such offences.
9. Treat children with respect regardless of race, color, gender, language, religion, nationality, ethnicity, disability or other status.
10. Comply with all relevant Indian and State legislation, including all child related laws.

It is **NOT** appropriate for staff to

1. Spend excessive time alone with children away from others.
2. Physically assault or physically abuse the child.
3. Use language that is discriminatory, abusive or hurtful to the child.
4. Develop relationships with the child that could in any way be deemed exploitative or abusive.
5. Store obscene / pornographic material (photographs, video clips) on their mobile phones and showing to children.
6. Browse, publish or transmit material in any form which depicts children engaged in sexually explicit act or conduct.
7. Create text or digital images and/or collects, seeks, browses, downloads, advertises, promotes, exchanges or distributes material in any electronic form depicting children in obscene or indecent or sexually explicit manner.
8. Show or talk of content that is sexual in nature or take photographs of children.
9. Behave physically in a manner which is inappropriate or sexually provocative.
10. Condone and/or participate in behavior of children which is illegal, unsafe or abusive.
11. Use physical punishment on children.
12. Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.
13. Stigmatize or humiliate a child.
14. Act in a manner that puts the child at risk.

15. Engage in any sort of physical contact with a child that may make the child or an observer feel uncomfortable, or that may be seen by an observer to be violating boundaries.
16. Engage in any communication with a child within or outside of school duties, that may make the child uncomfortable or that may be seen by an observer to be violating boundaries.
17. Conduct their own investigation into allegations or suspicions of potentially illegal or inappropriate behavior – it is an employee’s duty to report the matter to his/her Principals/Child protection coordinator.
18. It is important to note that whether or not a particular behavior or action constitutes inappropriate behavior will be a matter determined by the organization having regard to all of the circumstances, including past behavior, and allegations or suspicions related to such behavior.
19. Every complaint regarding inappropriate behavior or communication with a child, shall be taken cognizance of by the management of the School. However, whether or not a particular behavior or action constitutes inappropriate conduct, or is in contravention of the aforesaid Code of Conduct or this CPP, will be a matter determined by the management of the School, having regard to the relevant facts and circumstances. The findings and decision of the management of the School shall be final.

Prevention of Ragging and Bullying

To prevent ragging in the school campus/ premises or school buses, the Principal and the teaching staff should interact with students especially freshers and apprise them of their rights as well as an obligation to fight against ragging apart from complaining about the same and to generate confidence in their mind that any instance of ragging to which they are subjected or which comes in their knowledge should forthwith be brought to the knowledge of the Principal and/ or staff of the School and that such complaints shall be promptly dealt with while protecting the complainants from any harassment by the perpetrators of ragging.

The Principal and other senior members of the School staff should conduct meetings of teachers, parent(s) and students collectively or in groups, on bi-annual basis, to spread awareness that ragging is a reprehensible act.

Recruitment

The School shall undertake child safeguarding measures while appointing new staff and orient them on this CPP.

As a part of the recruitment process, interviews of the applicants are conducted by an interviewing panel. The panel assesses the applicant’s attitude towards children as also his/ her ability to safeguard and promote welfare of children. The School clearly talks about the knowledge of Child Protection to the interviewee.

Every member of the staff is given an ID Card which he/ she must carry all the time mandatorily.

The School officially applies for police verification and background checks of the applicants.

All newly selected candidates must also provide a signed affidavit to the educational institution that they have not been accused of offense under the POCSO Act, 2012 and JJ Act, 2015.

Regular training programs on all aspects of child safety are conducted by the School.

All staff members are continuously made aware of “Do’s and Don’t(s) in School Premises” which covers principles such as ‘No touch policy’, etc.

Briefing on Do’s and Don’t(s) is done on a regular basis so as to ensure that the concept of Child protection is ingrained in the minds and behavior of all staff members.

As a part of preventive measures for safety and security of students, visits to the school by outside visitors is strictly regulated. Visitors' management system has been introduced whereby the visitor has only controlled access and a written confirmation to the security for having met the concerned person only.

All school buses have qualified drivers and conductors. The School strictly adheres to the Supreme Court Guidelines and RTO and other school bus safety regulations.

Safety Guidelines for Online Learning Guidelines for Teachers

1. Continue to abide by the recommendations and guidelines as outlined in this CPP.
2. In case of suspected or observed child abuse of any kind, follow the reporting process outlined in this CPP and inform the Child Protection Officer.
3. Proactively check on the wellbeing of the students.
4. Maintain communication channels on appropriate platforms, do not interact with students over Facebook, Instagram, Snapchat, TikTok, Twitter or any other social media platform.
5. Ensure that your broadcasting location, clothing, surrounding environment, language, behavior, and body language is professional, appropriate, and culturally sensitive.
6. Use your full name as a display name in virtual spaces that you interact with students, do not use abbreviations, nicknames or characters that resemble alphabets.
7. Set up norms with your students about what can be shared in the group, and appropriate timings to do so.
8. Avoid sharing personal details, contact information, and details of your day-to-day life unless in the context of a learning session.
9. Check that the online learning platform you are using is secure and whether you have control over any intrusions, screen sharing or unwanted attendees.
10. Advise your students to engage in the learning session from a common space within earshot of parents/guardians wherever possible or in a space known to parents/guardians.
11. Engage with parents/guardians by sharing a digital learning plan and schedule to inform them of times of interaction.
12. Ensure that the content you are creating, using, or sharing is age-appropriate and culturally sensitive.
13. Do not share student work/data/opinions or images/videos from online learning sessions without taking consent from the student(s) involved.

Guidelines for Students

1. Students must use their full name and an appropriate profile picture on any platform when interacting with other students and teachers.
2. Students must not share personal information about themselves or anyone else on any platforms.
3. Students must not share images, videos or audio clips with personal or inappropriate content of themselves or anyone else.
4. Students must inform their parents/guardians about any and all online sessions and interactions.

Continuous Assessment and Monitoring of CPP

This CPP shall be comprehensively assessed annually so as to improvise the same in line with contemporaneous society.

An audit called "Child Safety Checklist" shall be conducted annually by a committee constituted by School Management. The audit shall be a critical analysis and evaluation of the safety and security of children at large studying in the school. An audit report shall be prepared and published annually.

The various actions required to be taken under this CPP, such as forwarding the complaint of a penal offense to the law enforcement agency, becoming a co-complainant, seeking legal opinion, taking disciplinary action against the wrongdoers and all other acts in connection with this CPP, shall be done by a committee or committees or Senior Staff Members who may be appointed for this purpose by the Management of the School.

The School has presently allocated responsibilities of protection of its students to the members of the Student Safety Committee.

This CPP may be revised or amended from time to time, by the Management of the School or by a committee appointed for this purpose.

Dissemination of this CPP

A copy of this CPP is given to all staff members and they shall acknowledge that they have received, read, understood and will abide by the CPP.

This CPP is also uploaded on the School's website.