

# CHILD PROTECTION POLICY

## BOMBAY CAMBRIDGE GURUKUL

### INTRODUCTION

The guiding principle of this policy is that the Bombay Cambridge Gurukul schools believe that it is our responsibility to protect and safeguard the children in our care. It is the right of every child to be protected from abuse. We recognize that all instances of abuse, in any form, have serious repercussions for the child, and assert a zero-tolerance approach towards abuse. This policy is written to ensure that the schools take every possible action to prevent abuse, so that no child in school has to experience abuse in any form either from an adult or from another child. The policy also identifies the need for all such incidents to be handled in accordance with laws laid down by statutory and regulatory bodies, at the same time ensuring respect and support for the dignity of all involved.

**DEFINITION OF CHILD-** Any person below the age of 18 years.

### SCOPE OF THE POLICY

- **Staff covered in this policy:**

*Those who have access/interact with students daily:* Admin, teachers, librarian, computer- lab- AV staff, clerical staff, CARE staff, support and maintenance staff, part-time/leave vacancy teachers, trainee teachers, central department staff, drivers and conductors, canteen staff, SMART board resource staff and other outsourced (in house) staff.

*Those who have access to /meet students situationally* – trainers, camp organizers, vendors, suppliers, coaches, book distributors, photographers, tour operators, hobby class trainers, costume suppliers, choreographers, examiners and moderators, uniform suppliers, general visitors, parents in school premises, ex-students, any outsourced agencies, external repair and maintenance people.

- **Children covered in this policy:**

Every child regardless of gender, age, ability, culture, religion, race, or language is covered under this policy.

The staff is bound by this policy to show care and responsibility for all enrolled students in the school premises and grounds, school buses, and those taken off-site (tours, camps, picnics, for events and competitions), and all those children who are on our school premises incidentally.

### THE POLICY SPECIFIES

1. THE DEFINITION AND TYPES OF ABUSE

2. PART –I

DIRECTIVES FOR SCHOOL ADMINISTRATORS

A) WITH THE SCHOOL AND STAFF

B) WITH ALL OUTSOURCED AND EXTERNAL RESOURCES

C) PROCEDURE FOR ADMIN TO HANDLE REPORTED ABUSE

3. PART – II

DIRECTIVES FOR SCHOOL STAFF

A) WITH STUDENT MANAGEMENT

B) WITH SCHOOL ENVIRONMENT (for students)

C) PROCEDURE FOR HANDLING REPORTED ABUSE

D) VIOLATIONS TO THE CPP

## THE DEFINITION AND TYPES OF ABUSE

### **Definition of Abuse:**

Abuse is a deliberate act of ill treatment that can harm or is likely to cause harm to a child's safety, well-being, dignity and/or development. Abuse involves all acts of omission or commission that are harmful to the child's physical, emotional or psychological well-being. Child abuse will have been committed regardless of any justification or reason that may be provided for the ill treatment including discipline, legal sanction, economic necessity, the child's own consent to it, or in the name of cultural and religious practice.

### **Types of abuse and their manifestation in schools:**

**Physical Abuse** involves the use of violent physical force or physical punishment so as to cause actual or likely physical injury or suffering, e.g. hitting, shaking, pinching, slapping, shoving, banging or punching, tying or locking up, dragging or pulling, tight grips, denying food or water or washroom facilities, force-feeding, forcing a child to stay in uncomfortable or undignified positions, or to take excessive physical exercise; and any punishments that risk the child's well-being. Use of any sort of physical punishments constitutes abuse.

**Emotional or psychological abuse** includes humiliating and degrading treatment such as use of foul language, name calling, constant criticism, belittling or insulting, persistent shaming, humiliating, ridiculing, ostracizing, and any verbal violence such as shouting and/or threatening. Use of any sort of verbal aggression constitutes abuse.

**Sexual Abuse** includes any sexually intended action and/or threat to a child, including indecent touching or pointing or exposure, use of sexually explicit language or gesture, showing or drawing pornographic material, taking indecent pictures of children or stripping etc. Any involvement of a child in any sexually intended activity constitutes abuse.

**Neglect** - It is sometimes called the 'passive' form of abuse in that it relates to the failure to carry out actions that result in significant impairment of the child's health or development including a failure to thrive emotionally and socially. In school, this includes denying for the child's basic needs, including medical attention, not making referrals to other professionals when needed or communicating with parents/caregivers, as well as ignoring or overlooking the social, emotional and educational needs of children. This also refers to inaction when child is exposed to risky/threatening material or situations, and/or leaving them unsupervised.

**CHILD PROTECTION POLICY**  
**BOMBAY CAMBRIDGE GURUKUL**

**PART I**

**DIRECTIVES FOR SCHOOL ADMINISTRATORS**

No plan for child safety can be complete without the sincere commitment of the admin. The success of this document depends on the actions and responsiveness of admin to student issues. Being conscious of every response in difficult situations, evaluating the efficacy of these actions, and generating better solutions are an integral part of applying a Child Protection Policy. It is expected that admin will ensure the CPP is always in focus when making decisions regarding staff and students.

**A) WITH THE SCHOOL AND STAFF:**

- The SCC will function as the School Safety Committee.
- Model all the components of the Child Protection Policy (CPP) in letter and spirit. No violations are acceptable at the level of admin.
- Communicate the policy to all levels of staff and ensure comprehension of its implications.
- Organize training to all staff to ensure their awareness about what constitutes abuse, its impact, signs to identify abuse, sensitive ways to dealing with student misbehavior, and skills for handling disclosure.
- Admin shall plan access to staff, students or/and parents to report abuse in any form. The SCC will draw up the protocol for handling reports of abuse, including false ones. Plan for the effective identification of violations, and the addressing of offenders systematically.
- Admin will define 'unsafe' material for students and staff that they are prohibited to bring into school.
- The admin shall devise systems that will ensure that the policy stays fresh and active for all staff and is consciously progressing towards being an abuse-free school.
- Formulate minimum standards of protection for all outsiders such as visiting parents, suppliers and vendors, individuals or parties contracted or outsourced to work in the school and/or with the students, guests, visiting teachers etc. with particular attention given to newly recruited staff, newly enrolled students and their parents.
- Lay down clear guidelines for student to student behavior, and guide all children to treat each other with respect and sensitivity. Devise an anti-bullying policy for students.
- Plan a student suggestion box, and guide the student council to ensure awareness among children about ways to stay safe and communicate distress to key adults.
- Identify teaching points in the curriculum related to safety, design the life skills program based on perceived needs of students, and offer awareness programs for students, staff, and parents periodically.
- Any violations of the CPP must be responded to by the admin. Every opportunity to reaffirm the school's commitment to the CPP will have a cascading effect on staff. Once instructions are in place, and training has been instituted, the admin may plan consequences for violations that consider the type of violation, severity and frequency.
- The CARE centre should be adequately equipped to manage cases of child abuse with professional consultation and intervention skills.
- Ensure adequate measures for security in the school, control the movement of visitors and plan identification and validation for all non-staff who are on the school premises for any reason.
- Recruitment guidelines:  
It is important that all new recruits are carefully whetted before being offered employment. For this the recruitment procedure should consider verification of credentials, inquiry with previous employers, and a well designed interview process. The first 2 years of service should involve carefully monitoring and observations, and credibility should be established before confirmation.
- The admin will plan and maintain records of incidents related to indiscipline, and deal with them promptly and appropriately, enrolling the CARE center where necessary.
- The admin shall develop an anti-bullying policy that outlines the procedure of managing harmful and disturbing behaviors from time-to-time, in order to ensure that it remains effective and relevant. The policy should identify corrective actions for both the offender and the victim.

- ☞ The admin shall specify a student safety policy, a data protection policy, as well as a discipline policy for staff.
- ☞ Plan the method of measuring and evaluation of the school environment to track progress and impact of the policy.
- ☞ Review the CPP annually, and discuss revision thereafter every 3 years.

## **B) WITH ALL OUTSOURCED AND EXTERNAL RESOURCES:**

### **MINIMUM STANDARDS OF PROTECTION**

The MSP applies to all persons who have access/meet students periodically or situationally, as a result of a contract with the school, or the outsourcing/hiring of their services for a temporary period of time. The policy therefore applies to all persons who students are exposed to, and who are not staff of the school. This includes camp and field trip organizers, VG vendors, suppliers, coaches, book distributors, photographers, tour operators, hobby class trainers, costume suppliers, choreographers, examiners and moderators and visiting faculty, teacher trainees, uniform suppliers, general guests/visitors and prospective parents, applicants, any parents or ex-staff or ex-students in school premises, any outsourced agencies (including CD), external repair and maintenance people, couriers and salesmen.

**MSP:** (shaded area for display in school for parents)

- Please treat students with respect and sensitivity at all times, ensuring that you not cause offence by word or action.
- Please ensure you are properly and formally attired when around students. You will wear an ID supplied by the security while in school premises.
- Please restrict your movements in the premises, and leave the premises once your work is done.
- Please do not meet or interact with students or take them out of the premises without authorization from an admin.
- Please do not use any inappropriate or abusive language with students or in the presence of students.
- Please do not take photographs/videos in the school premises and/or of students without permission.
- Please do not carry unsafe or potentially dangerous material when in school premises, including sharp or inflammable objects.

In addition:

- You will not share or seek personal data of and from students. Any data regarding school students cannot be shared with anyone else under any circumstances. No student may be contacted directly but through parent or school staff even after the event.
- You will avoid any physical contact with any student for any reason whatsoever. Adequate distance must be maintained when talking to students.
- You will not consume any tobacco/alcohol related products when around the students (in and out of premises). If so found, strict action will be taken.
- You will not accept or provide any favors to students, nor engage with them in any commercial transaction outside the school contract.
- In case of an emergency, do not act without permission from the admin (except when the child's best interest supersedes this)
- You will report any observed abuse immediately to the school authorities.

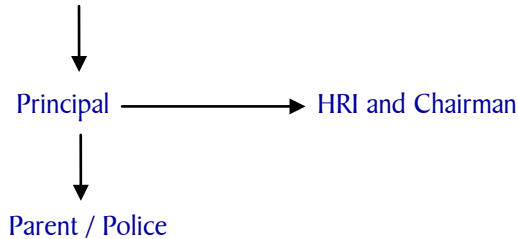
**All contracts with external suppliers and agencies should include:** Clear instructions regarding contact in case of emergency, plan for medical emergencies, the right of the school to check any content that maybe used, policy regarding cancellation or use of helpers/substitutes, and ensuring students are supervised at all times (till handed over to a parent or teacher).

## C) PROCEDURE FOR ADMIN TO HANDLE REPORTED ABUSE:

All school personnel who in the course of any aspect of their professional duties, have reasonable grounds to suspect that a child under the age of 18 has been / is being abused (physically or sexually), are required to comply promptly with the mandatory provisions of the document. A failure to comply with this statutory duty is an offence.

**Sexual Abuse:** All CSA cases will be dealt by the Principal directly. No delegation is permitted.

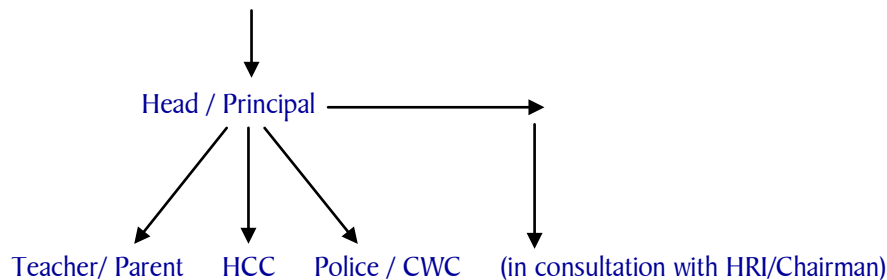
Reported by Parent/student/staff



- Principal will plan the coordination of information with relevant members of staff.

**Physical /Emotional abuse:**

Reported by Parent/student/staff



**Admin will guide staff for handling reported abuse:**

Any staff person if witness to disclosure or to actual abuse should be guided to:

- Follow guidelines for handling disclosure / stop the abuse and safeguard child.
- Report the matter to their Head on the same day, without delay.
- Ensure confidentiality.

**Informing Parents / Guardians**

It is essential that parents / guardians are involved in handling any cases of detected abuse.

In the event parents cannot be contacted, the safety of the child will be of paramount importance.

In certain circumstances, informing parents should be deferred particularly where there are concerns about physical or sexual abuse involving family members. These include situations when:

- Informing parents/ guardians might place the child at increased risk
- A disclosure by a child involves a parent or other family member
- Informing parents/ guardians might place staff at risk

In such circumstances, the school and Management may plan steps with caution and discretion.

When the abuse involves another child as perpetrator – the school admin will proceed with extreme caution. A discussion is essential before informing parents, and the decision should focus on the best interest of the children involved as well as other children of the school.

## CHILD PROTECTION POLICY

### BOMBAY CAMBRIDGE GURUKUL

#### PART II

#### DIRECTIVES FOR SCHOOL STAFF

In keeping with the United Nations Convention for Child Rights, the Commission of Child Rights Act 2005, the Protection of Children from Sexual Offences Act 2012, and other related legislations, as well as the Bombay Cambridge Gurukul schools Mission and Vision, the Child Protection Policy has been drafted as a formal document applicable to all those in employment of **BOMBAY CAMBRIDGE GURUKUL SCHOOLS** whether temporary, permanent or on contract.

As educators, it is our responsibility to provide a safe environment for children and services which foster their health, developmental needs, abilities, self respect and dignity. Every staff of this school must commit to the sensitive care and handling of students in the school in keeping with this policy. With this policy, every staff will ensure a learning environment for students which is free from any threat or fear, and will make every effort to reduce and eradicate wherever possible, incidents in which students are made to feel frightened, excluded or humiliated.

#### A) WITH STUDENT MANAGEMENT

##### Rules for interaction with students in school:

1. Staff shall ensure that their behavior with students is decent and appropriate at all times, befitting the relationship of teacher and student.
2. Staff shall care for all children and focus on correction rather than punishment. No corporal punishment can be used with any children in the school. Any kind of physical violence, however mild it maybe, if intended to coerce, scare or humiliate a student, will be defined as abusive. This includes strict restriction of hitting, slapping, pushing, pinching, ear-pulling, throwing chalk or any other object with intent to hurt, making child kneel, pulling hair, bending finger, tight grips, or similar actions. No staff shall threaten children with the intent to cause fear or punish them physically for any reason. Staff must only use physical intervention as a last resort to protect the safety of children or adults, after appropriate de-escalation strategies have been used or in the event of serious situations where this is not possible.
3. Treat children with respect: No staff will use any form of verbal violence or emotionally hurtful language with students with the intention to cause shame, guilt, or fear. Verbal abuse will also include all forms of sarcasm, misuse of personal information of the child, labeling or discrimination, isolation or comparison or victimization, gossip or comments regarding his/her appearance, race, religion, or family. No staff shall shout, yell, or demonstrate verbally abusive behavior with students or in their presence.
4. Teachers will not show favoritism or partiality, nor will they victimize, persecute or target any student for negative attention. Teachers will not make any derogatory remarks on a student's worksheet or project or to any student for any effort s/he has made towards his/her academic and curricular work or performance in competitive and non-competitive events.
5. No staff shall assign handling of student misbehavior to another student. It is suggested that the word 'monitor' be replaced by the words 'class volunteer'.
6. No staff shall touch any student nor ask a student to touch them for any reason whatsoever. Touching or holding a child may be necessary to offer assistance in case of:
  - a medical emergency or
  - use of washroom (uptil the age of 4 years), or
  - physically challenged children who may require help, or
  - when a child is under extreme distress.

At all times, the child's permission must be sought. As much as possible above Std. I, the same gender staff will provide assistance (below that, female only).

7. If any child is found to be in distress or injured, any staff near-by must help the child and report the matter to their authorities immediately. Any student requiring first aid must be accompanied by someone for assistance.

8. No staff will be found alone with a student in any part of the school premises. Staff will maintain a physical distance from students that is respectful and appropriate.
9. Cleaning staff will not enter washrooms if there are any students inside.
10. No staff should be found carrying any inappropriate material, or download or have any such material on computers assigned to them, or carry any objectionable material on personal items such as cell phones and pen-drives.
11. No staff will share their personal information such as phone number, on-line information or address with students, and are restricted to acquire the same from students as well, unless permitted by the HM.
12. Staff will not meet any child outside of the school or at his/her house, nor invite any child to his/her place or any outside location in a personal capacity.
13. Staff will maintain strictly professional relationships with parents of the school, and avoid any casual or informal association with them in and out of the school premises.
14. Staff will ensure they report any inappropriate activity inside or outside school (involving students) to the HM without delay.
15. All student misbehavior (on or off site) will be handled with care, consistency and impartiality, and all serious misbehavior which is physical or sexual in nature, must be reported to the HM without exception.
16. Any staff who observes or suspects any potential sign of abuse (injuries, bruises, marks etc) on any child, will report it to the HM. If any staff witnesses any sort of abuse of a child, they will do all they can to stop it at once.

**Rules for interaction with students off-site (outside school):**

1. A suitable adult/teacher-student ratio should be planned and implemented for all off-site activity.
2. Staff will not leave students unaccompanied any time - to any places such as washroom, shops, food stalls – in any place except their assigned rooms.
3. Staff will not assign their students to the care of any stranger or any person who is not school staff.
4. Staff will ensure that students are not provided any unsafe material for consumption, nor provided any unsafe activity during their outing.
5. Staff should conduct a head-count every 2 hours.
6. Off-site, staff is on duty 24X7, and must ensure supervision of students throughout.
7. Staff must carry with them a list of all the children in their supervision with their contact numbers. If children are carrying a phone, the group leader must have those numbers as well.
8. Staff must carry with them a list of those children with medical concerns and emergency instructions.
9. Staff in-charge must report daily to the HM about their status, and of any concerns that have come about. Any medical emergency or major conflict must be communicated to the Principal immediately.
10. If admin is inaccessible, the teacher in charge shall consult all present teachers, and decide on the basis of consensus in the best interest of the child.
11. Staff must ensure they don't get informal or casual in their behavior with students during such outings.
12. Staff will observe all the rules that apply to students in the presence of students.
13. Staff should deal professionally with all unknown and outside people, and ensure they don't compromise the safety of the students by their own behavior.
14. Staff will not take pictures of students and upload or share them on-line, even unintentionally. Staff will not allow outsiders to take pictures of students either.
15. Till students are picked up by their parents, the teacher will stay in charge of her students and will not leave them alone or unattended. Staff will not drop out mid-way to depart for home till all students have been handed over to their parents.

**Rules for student information and privacy:**

1. Staff will not interact with current students on any social media.
2. Staff will not carry or share any student information with anyone outside of the school (including the media) without proper authorization.
3. Staff will not upload any pictures of students on their personal on-line sites or retain on cell phones.
4. Staff will ensure respect and confidentiality for student information, and refrain from any casual sharing of information except with real cause and to those relevant.
5. No networking groups can be created with students or parents without the permission of the Principal.
6. Any photographs on the school sites or publications must be authorized by the Principal.
7. Staff will not collect any information about students except as directed by the HM.

8. For any sample document, care should be taken to black-out the child's name or any information that may reveal his/her identity.
9. If any unsafe material is confiscated from students, staff will immediately deposit said material with the HM.
10. If staff has any information about a student that puts him/her or others in danger or at-risk; the staff will immediately inform the HM of such information.

## **B) WITH SCHOOL ENVIRONMENT (for students)**

The staff will guide students towards socially responsible and sensitive behaviors with each other when in school. Such behavior may include any instances of bullying, aggression, coercion, ostracizing, shaming or harassment; or it may involve the carrying of material that is inappropriate or dangerous. We will strive to reduce and eradicate wherever possible, incidents in which students are made to feel frightened, excluded or humiliated.

All staff are required to bring to student awareness that creating a warm and safe school environment is the responsibility of all students. If every student were to be responsible for his/her own behavior, this can be smoothly achieved. The following rules can help create an inclusive and supportive climate for all students in the school:

- ♣ Students are expected to use polite and decent language at all times. Any use of offensive language, teasing and name calling is unacceptable.
- ♣ Students must help other students, and accept the right of another student to say 'No'. Any bullying, harassment, threats or intimidation to other students will not be accepted.
- ♣ Students will treat all students with respect, and awareness of their right to privacy. No student action should lead to outraging the modesty of another or cause humiliation.
- ♣ Students will use communication and cooperation to manage differences and refrain from resorting to verbal or physical aggression or violence of any kind.
- ♣ Students will operate social networking media responsibly so that it does not malign, abuse or embarrass anyone else.
- ♣ Students will ensure that they do not isolate, ostracize, or victimize any other student for any reason.
- ♣ Students will report all unsafe behaviors and any form of student distress to teachers immediately.

**Role of staff with the Anti-Bullying Policy:** To ensure the safety of children from bullying, every member of the school will contribute towards a culture of respect, tolerance and inclusion everywhere in the school premises and off-site when on duty.

- ♣ The staff will actively support the school and promote a respectful and peaceful environment in the premises and classrooms through all means available.
- ♣ Staff will ensure that they promote healthy strategies for conflict resolution amongst students, and ensure a healthy social climate in the classrooms.
- ♣ Advocacy will aim at creating awareness amongst all students, staff, and parents of the school about the impact and repercussions of unsafe behaviors.
- ♣ No staff shall allow, tolerate, condone or trivialize bullying behaviors. We must respond effectively to all instances of bullying that are reported to us.
- ♣ Staff will provide support to students who have been bullied, and use effective behavior management strategies to prevent recurrence of this act.
- ♣ Staff will ensure that whistle-blowers (those who report or inform) are protected.
- ♣ All staff will continually upgrade their skills with managing student aggression, and take responsibility for the effective management of all students in their care.
- ♣ The student council will be enrolled to spread awareness in the student body, and provide access to student for reporting abusive behavior.

All staff will ensure that students can access them when in need, and that they (staff) will make every effort to understand and appropriately handle the issue brought to them. Staff will ensure they are fair in their decisions and are able to plan consequences without violating child rights. Every staff person in the school will help students to solve problems and manage their disputes amicably. Matters of importance must be reported to the Principal without delay.



### **C) PROCEDURE FOR HANDLING REPORTED ABUSE:**

All school personnel who in the course of any aspect of their professional duties, have reasonable grounds to suspect that a child under the age of 18 has been / is being abused (physically or sexually), are required to comply promptly with the mandatory provisions of this document. A failure to comply with this statutory duty is an offence.

Any staff that has:

- committed any violation of the Child Protection Policy, or
  - has witnessed any other staff violating this policy, or
  - if during the course of conversation with student, parent or any vendor has detected an instance of abuse, or has been reported about the same,
- will immediately report the matter to the Head of their section.

Any staff person if witness to actual abuse will:

- Stop the abuse and safeguard child.
- Report the matter to their Head on the same day, without delay.
- Ensure confidentiality.

### **D) VIOLATIONS TO THE CPP:**

Both, acts of omission and commission, should be reported to admin immediately. Any violations of the Child Protection Policy will warrant immediate action for the staff concerned. The actions may include:

- Reassignment of duty
- Submission of Apology letter
- Entry in CR/service book
- Memo
- Withholding of increment
- Suspension
- Termination
- Report to police

**Let's join hands to create a safe and sensitive school environment which will ensure the best possible psychological advantage to our students and to children everywhere.**

## CREDITS

The Child Protection Policy has been developed for the Bombay Cambridge Schools in December 2014 by the Principals and Administrators of the following schools:

- Bombay Cambridge School, Andheri (W)
- Bombay Cambridge International school, Andheri (W)
- Bombay Cambridge School, Andheri (E)
- Bombay Cambridge International school, Andheri (E)
- Dr. Sarvepalli Radhakrishnan Vidyalaya, Malad (W)
- Dr. S. Radhakrishnan International School, Malad (W)
- Dr. Sarvepalli Radhakrishnan Vidyalaya, Borivali (W)
- Dr. S. Radhakrishnan International School, Borivali (W)
- Veer Bhagat Singh Vidyalaya, Malad (W)
- Veer Bhagat Singh International School, Malad (W)
- Dept of HRD and Center for Educational Design and Publishing

The policy was guided and formalized by the Chief Educational Officer, Ms. Achama Mathew, and the Head-HRD, Ms. Upasana Saraf.

With the enforcement of the Protection of Children from Sexual Offences Act of 2012, the handling of children with care and sensitivity was nationally ratified, providing the much needed support to the beliefs and student sensitive endeavors of the Bombay Cambridge Gurukul. By developing a formal document for Child Protection and defining its application, the Bombay Cambridge schools re-affirm their commitment to providing student services which foster their health, developmental needs, abilities, self respect and dignity.

The creation of the policy is a conscious goal towards developing a student sensitive and responsible school environment, and the focus of the implementation plan has been to involve all stake-holders to subscribe to it in letter and spirit.

The document has been created using the following references:

1. GOVERNMENT OF INDIA NATIONAL POLICY FOR CHILDREN, 1974
2. NATIONAL PLAN OF ACTION FOR CHILDREN 1992  
Department of Women and Child Development, Ministry of Human Resource Development 1985
3. THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD 1989 (UNCRC)  
(Ratified by India on 11<sup>th</sup> December 1992)
4. THE PROTECTION OF CHILDREN FROM MENTAL AND PHYSICAL VIOLENCE  
The Juvenile Justice (Care and Protection of Children) Act, 2000
5. COMMISSION FOR PROTECTION OF CHILD RIGHTS ACT, 2005  
The National Commission for Protection of Child Rights (NCPCR), 2007
6. THE PROTECTION OF CHILDREN FROM SEXUAL OFFENCES ACT 2012

The preparation involved meetings with teachers to invite participation in the practical application of the document. Awareness sessions covering the entire teaching and non-teaching staff as well as the entire parent body of the 5 schools were conducted in this period, reaching over 10,000 people.

The document has been ratified by the Core Committee of the Bombay Cambridge Gurukul schools, and is formally in effect for all members of the organization from June 2015.

