

# CHILD PROTECTION POLICY

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## POLICY DETAILS

|                               |                                                                                                                           |
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| <b>Policy Name:</b>           | Child Protection Policy                                                                                                   |
| <b>Policy Owner(s):</b>       | HoS - Vardan Kabra, DHoS - Ankita Diwekar Kabra                                                                           |
| <b>Policy Executioner(s):</b> | Well-Being Counselors, Child Protection Committee, Child Protection Officer.                                              |
| <b>Policy Start Date:</b>     | -                                                                                                                         |
| <b>Last Updated:</b>          | 27th September 2024                                                                                                       |
| <b>Version &amp; Code:</b>    | 1.4 - POL/WBC/CP/01/Ver - 1.4                                                                                             |
| <b>Approver:</b>              | HoS - Vardan Kabra                                                                                                        |
| <b>Objective:</b>             | •                                                                                                                         |
| <b>Value(s):</b>              | •                                                                                                                         |
| <b>Applicable:</b>            | • To all Students, Staff (Teachers, Admin Staff, Support Staff) and all visitors of the school (vendors, labourers, etc.) |
| <b>Rationale:</b>             | •                                                                                                                         |
| <b>Frequency:</b>             | • To be reviewed at the beginning of each Academic Year                                                                   |

## ABBREVIATIONS

| Designation    |                                                                   |
|----------------|-------------------------------------------------------------------|
| FS             | Fountainhead School                                               |
| POCSO ACT 2012 | The Protection of Children from Sexual Offences Act (POCSO), 2012 |
| UN             | United Nations                                                    |
| CPP            | Child Protection Policy                                           |
| CPO            | Child Protection Officer                                          |
| CPC            | Child Protection Committee                                        |
| HoS            | Head of School                                                    |
| DHoS           | Deputy Head of School                                             |
| Hos(D)         | Head of School Designate                                          |
| SSP            | Senior School Principal                                           |
| JSP            | Junior School Principal                                           |
| CMO            | Chief Manager Operation                                           |

## OPERATIONAL DEFINITIONS

| Sr. No. | DEFINITIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.      | <b>School Safety:</b> <ul style="list-style-type: none"> <li>Creating a safe environment for children, starting from the transportation from their homes to their schools and back.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2.      | <b>Safety:</b> <ul style="list-style-type: none"> <li>A state in which hazards and conditions leading to physical, psychological or material harm are controlled in order to preserve the health and well-being of individuals and the community.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.      | <b>Security:</b> <ul style="list-style-type: none"> <li>A condition that is created by taking measures in coordination with concerned people to make the environment free of crime, violence and injury.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4.      | <b>Child Abuse:</b> <ol style="list-style-type: none"> <li>According to the World Health Organization, child abuse constitutes “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Types of Abuse to be looked into as a Part of Child Protection Policy: <ul style="list-style-type: none"> <li>a) <b>Physical abuse</b> - may involve hitting, shaking, throwing, poisoning, burning or</li> </ul> </li> </ol> |

scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child. Possible Signs of physical abuse may include:-

- i) Bruises, burns, sprains, dislocations, bites, cuts
- ii) improbable excuses given to explain injuries
- iii) Injuries which have not received medical attention
- iv) Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc.
- v) Repeated urinary infections or unexplained stomach pains
- vi) Refusal to discuss injuries
- vii) Withdrawal from physical contact
- viii) Arms and legs kept covered in hot weather
- ix) Fear of returning home or of parents being contacted
- x) Showing wariness or distrust of adults
- xi) Self-destructive tendencies
- xii) Being aggressive towards others
- xiii) Being very passive and compliant
- xiv) Chronic running away

**b) Emotional Abuse:**

- i) Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development and may involve.
- ii) Conveying to children that they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person.
- iii) Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction.
- iv) Serious bullying causes children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- v) Possible Signs of Emotional Abuse:
- vi) Physical, mental and emotional development is delayed
- vii) Highly anxious
- viii) Showing delayed speech or sudden speech disorder
- ix) Fear of new situations
- x) Low self-esteem
- xi) Inappropriate emotional responses to painful situations
- xii) Extremes of passivity or aggression
- xiii) Drug or alcohol abuse
- xiv) Chronic running away
- xv) Compulsive stealing
- xvi) Obsessions or phobias
- xvii) Sudden under-achievement or lack of concentration
- xviii) Attention-seeking behaviour
- xix) Persistent tiredness
- xx) Lying

**c) Sexual Abuse:**

- i) Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts.

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|    | <ul style="list-style-type: none"> <li>ii) Sexual abuse includes abuse of children through sexual exploitation.</li> <li>iii) Sexual abuse includes non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.</li> <li>iv) Possible Signs of sexual abuse:</li> <li>v) Pain or irritation to the genital area.</li> <li>vi) Difficulty with urination.</li> <li>vii) Infection, bleeding.</li> <li>viii) Fear of people or places.</li> <li>ix) Aggression.</li> <li>x) Regressive behaviours, bedwetting or stranger anxiety.</li> <li>xi) Excessive masturbation.</li> <li>xii) Sexually provocative behaviour.</li> <li>xiii) Stomach pains or discomfort walking or sitting.</li> <li>xiv) Being unusually quiet and withdrawn or unusually aggressive.</li> <li>xv) Suffering from what seem physical ailments that can't be explained medically.</li> <li>xvi) Showing fear or distrust of a particular adult.</li> <li>xvii) Mentioning receiving special attention from an adult or a new "secret" friendship with an adult or young person.</li> <li>xviii) Refusal to continue with school or usual social activities.</li> <li>xix) Age-inappropriate sexualised behaviour or language.</li> </ul> <p><b>d) Grooming:</b></p> <ul style="list-style-type: none"> <li>i) Grooming is when someone builds a relationship, trust and emotional connection with a child so they can manipulate, exploit and abuse them.</li> <li>ii) Groomed children can be sexually abused.</li> <li>iii) Grooming can be done by anybody irrespective of age or gender.</li> <li>iv) Grooming can take place over a short or long period of time – from weeks to years.</li> <li>v) Groomers build a relationship with the child's family or friends to make them seem trustworthy or authoritative.</li> </ul> <p><b>e) Neglect:</b> is the persistent failure to meet a child's basic physical or physiological needs, likely to result in serious impairment of the child's health or development.</p> <p>Possible indicators of neglect:</p> <ul style="list-style-type: none"> <li>i) Medical needs unattended</li> <li>ii) Lack of supervision</li> <li>iii) Consistent hunger</li> <li>iv) Inappropriate dress</li> <li>v) Poor hygiene</li> <li>vi) Inadequate nutrition</li> <li>vii) Fatigue or listlessness.</li> <li>viii) Extreme loneliness.</li> <li>ix) Extreme need for affection</li> <li>x) Failure to grow</li> <li>xi) Poor personal hygiene</li> <li>xii) Frequent lateness or non-attendance at school.</li> <li>xiii) Low self-esteem</li> <li>xiv) Poor social relationships.</li> <li>xv) Compulsive stealing.</li> <li>xvi) Drug or alcohol abuse.</li> </ul> |
| 5. | <p><b>Child Protection:</b></p> <ul style="list-style-type: none"> <li>• A broad term used to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| 6.  | <b>Child Protection Policy:</b> <ul style="list-style-type: none"> <li>A statement of intent that demonstrates a commitment to protecting students from harm (to self and from others) and makes clear to all what is required in relation to the protection of students.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 7.  | <b>School Management:</b> <ul style="list-style-type: none"> <li>In the case of Fountainhead School, school management refers to an administrative set-up of the school system, in which a group of persons like the Owner/Trustee, Head of School, Safety officer, Child Protection Officer, Principal, Vice-Principal, Senior Teacher, student leader and any other such person, who is entrusted with the duty to supervise, plan, organize, review and evaluate various aspects of an educational institution in a formal way i.e school order, notice, duty chart, etc. School Management is also responsible for monitoring and managing the overall strategic directions, finances, performance and policies of a school and provides advice and guidance to the Principals of the Junior and Senior schools.</li> </ul> |
| 8.  | <b>Protection Of Children from Sexual Offences Act 2012:</b> <ul style="list-style-type: none"> <li>The Protection of Children from Sexual Offences Act (POCSO), 2012 was enacted to provide a robust legal framework for the protection of children from offences of sexual assault, sexual harassment and pornography while safeguarding the interest of the child at every stage of the judicial process. The framing of the Act seeks to put children first by making it easy to use by including mechanisms for child-friendly reporting, recording of evidence, investigation and speedy trial of offences through designated Special Courts.</li> </ul>                                                                                                                                                                  |
| 9.  | <b>Child:</b> <ul style="list-style-type: none"> <li>Child” means a student admitted and enrolled in a School located anywhere in India.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10. | <b>Cyber Bullying:</b> <ul style="list-style-type: none"> <li>“Cyber Bullying” means any form of intimidation or harassment, using a computer, communication device or computer network or the Internet.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11. | <b>Mental Harassment:</b> <ul style="list-style-type: none"> <li>Mental Harassment means and includes insults, ridicule, humiliation, name-calling and repeated threats to cause physical violence to a child.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12. | <b>Penal Offense:</b> <ul style="list-style-type: none"> <li>Penal Offense 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.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 13. | <b>Physical Violence:</b> <ul style="list-style-type: none"> <li>“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.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 14. | <b>Bullying/Ragging:</b> <ul style="list-style-type: none"> <li>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 classmate 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.</li> </ul>                                                  |
| 15. | <b>Sexual Assault:</b> <ul style="list-style-type: none"> <li>Sexual Assault has the same meaning as assigned to it in Section 7 of the POCSO Act, 2012.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 16. | <b>Sexual Harassment:</b> <ul style="list-style-type: none"> <li>Sexual Harassment has the same meaning as assigned to it in Section 11 of the POCSO Act,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                         | 2012.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 17.                     | <p><b>Stalking:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>POLICY STATEMENT</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 1.                      | Fountainhead School, Surat (from here onward known as FS in this policy document) promotes holistic school safety, where every student has a right to a protective environment, free of violence, harassment, abuse and neglect.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2.                      | FS takes appropriate action to ensure that such young people and especially vulnerable children are provided a safe learning environment at school based on respect for the child . This Child Protection Policy (CPP) addresses multiple dimensions of the vulnerability faced by the child during the entire cycle of engagement with the school based on respect for the child.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.                      | The present Child Protection policy attempts to provide clear direction to staff and others about the expected codes of behaviour in dealing with Child Protection issues. It also makes explicit the school's commitment to the development of good practice and sound procedures. This ensures that Child Protection concerns and referrals may be handled sensitively, professionally and in ways which prioritizes the needs of the child.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 4.                      | POCSO Act, 2012 maintains that all children have an equal right to access education in an environment that is safe, protective and conducive to the overall development. The challenges of gender inequality, eve teasing and sexual abuse in school environment call for increased awareness and creating synergy among parents, teachers and schools.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5.                      | FS believes that every child who participates in the school activities has the right to enjoy a safe environment and be protected from harm. In line with the United Nations Convention on the Rights of the Child, which states that all children have a right to protection, FS reaffirms that it has a duty of care and obligation to protect those children for whom we are given responsibility. The school believes that the welfare of children is the highest priority and it is the responsibility of everyone in FS 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 FS Child Protection Policy. This approach enables all children to access, participate in and benefit fully from learning opportunities in a space that inspires their confidence and holistic sense of well-being. |
| 6.                      | This Child Protection Policy focuses on the development of children by providing them a safe and caring environment on school campuses/school trips. It provides guidelines to protect FS students from physical violence, mental harassment, sexual abuse, social neglect and bullying.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7.                      | This Policy covers abuse, harassment, and offences that can occur in school campus and in premises under control of the Institution including virtual learning spaces, as well as extended environments organised and supervised by school <b>(such as travel by any modes of transport organised by school, hotel on school trips, camps and perimeters of camping venues, conference venues, inter-school activities venues and any other events venues for which school is organising logistics)</b> i.e. the areas where students are under the care of FS staff, during school hours or after school hours till the time students are under the care of the employees of the school. CPP aims to protect FS students and applies to FS School Staff/ Teachers/ Visitors/ Parents/ Visiting Faculty/ Third Party Service Providers who directly/indirectly interact with students of FS on campus or in the extended environment listed above.          |

# POLICY GUIDELINES

## CHAPTER 1

### A) GOVERNING PRINCIPLES & SCHOOL COMMITMENT

| Sr.<br>No.                                                                                                                                                   | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Child Protection Policy is guided by the non-negotiable fundamental principles for realisation of the rights of all children and includes in particular: |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 1.                                                                                                                                                           | <b>Principle of Best Interest of the Child:</b> <ul style="list-style-type: none"> <li>The right of the child to have her or his best interest taken as primary consideration which is a substantive right, a fundamental interpretative legal principle and a rule of procedure. It also implies that institutions, services and facilities responsible for care or protection of children will conform to standards established by competent authorities, particularly in the areas of safety, health and supervision and reiterates the rights and duties of parents, guardians, and other individuals legally responsible for them.</li> </ul>                                                             |
| 2.                                                                                                                                                           | <b>Principle of Safety:</b> <ul style="list-style-type: none"> <li>No harm, no abuse, no neglect, no maltreatment. All measures will be taken to ensure that the child is safe and is not subjected to any harm, abuse or maltreatment while in contact with the care providers and education system.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.                                                                                                                                                           | <b>Principle of Equality and Non-discrimination:</b> <ul style="list-style-type: none"> <li>All children shall be treated equally and given equal opportunity and treatment. There shall be no discrimination against a child on any grounds including gender, religion, caste, class, place of birth, disability etc. Stigmatising vocabulary or language will also not be used in class or in the school.</li> </ul>                                                                                                                                                                                                                                                                                         |
| 4.                                                                                                                                                           | <b>Principle of Confidentiality:</b> <ul style="list-style-type: none"> <li>Every child has a right to protection of her/his privacy and confidentiality, in matters that call for such. Confidentiality shall be maintained when there has been abuse, especially when there has been sexual abuse. Confidentiality should be maintained to the highest degree possible at all stages of disclosure, but in cases of known or suspected harm, reporting to proper authorities is mandatory.</li> </ul>                                                                                                                                                                                                        |
| 5.                                                                                                                                                           | <b>Principle of Participation:</b> <ul style="list-style-type: none"> <li>Every child has a right to be heard, listened to and to participate in all processes and decisions affecting her or his interest and the child's views shall be taken into consideration with due regard to the age and maturity of the child. It has been noted that the right of a child to be heard is not only a right in itself but should be considered in the interpretation and implementation of all other rights. The parent/guardian and family of the child also have a right to such participation unless decided otherwise by the Competent Authority. It also enables a child to provide informed consent.</li> </ul> |
| 6.                                                                                                                                                           | Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to. This will be achieved through: <ul style="list-style-type: none"> <li>A whole school and senior leadership commitment to creating a supportive school ethos</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                             |

- The pastoral role of the class teacher.
- The role of the Principal, teachers, counsellors and support staff who work with children identified as having additional social, emotional, physical or learning needs Promoting pupil's voice.

## CHAPTER 2

### B) CHILD PROTECTION POLICY (CPP)

#### B-1) INTRODUCTION

1. Fountainhead 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.
2. We believe that the welfare of children is the highest priority and that it is everyone's responsibility 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.
3. This CPP is a comprehensive set of guidelines that define our commitment to safeguarding children from harm and abuse from adults. This helps to create a safe and positive environment for children and lays out the roles and responsibilities of all stakeholders.

#### B-2) SCOPE OF CPP

1. **Zero Tolerance Policy:** The School follows a 'zero tolerance' approach to any act of violence, bullying, sexual abuse, cyberbullying, neglect or related misconduct. This policy applies to all activities and settings under the School's purview, including:
  - School Premises: All areas within the school grounds.
  - School Buses: Transport provided by the School.
  - Extended Environments: Any other environments associated with the School's activities, such as field trips, extracurricular events, and virtual platforms used for school purposes.
2. **Coverage of Abuse and Offences:** This CPP addresses various forms of abuse, harassment, and offences including:
  - Physical Abuse: Any form of physical harm or violence.
  - Sexual Abuse and Harassment: Any unwanted or inappropriate sexual behavior.
  - Bullying and Cyberbullying: Any form of intimidation or harassment, including online.
  - Mental and Emotional Abuse: Actions that cause psychological harm.
  - Neglect: Failure to meet the basic needs of a child. The policy applies to incidents occurring both on the school campus and during any activities organised by the School, whether on or off-campus.
3. **Key Elements of the CPP:** This CPP incorporates key elements essential for the protection of children:
  - Prevention of Abuse: Strategies and practices aimed at preventing any form of abuse.
  - Complaint Mechanisms and Response: Procedures for reporting, investigating, and addressing complaints.
  - Recruitment: Guidelines for ensuring that individuals working with children are properly vetted and trained.
  - Disciplinary Actions: Processes for handling misconduct and enforcing consequences.
  - Monitoring and Review: Ongoing evaluation of the policy's effectiveness and implementation

|                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                       | to ensure continuous improvement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>B-3) APPLICABILITY</b>                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1.                                                                                                    | The child protection mandate must be reflected not only in the policies but also reflected in every aspect of the school administration and management including in staff recruitment, training and teaching learning transactions that would impact interactions between teachers, students, the school environment and parents – rendering them more child centric.                                                                                                                                                                                                                                                                                             |
| 2.                                                                                                    | <p>The policy will apply to all personnel and persons related to the school and who come in direct or indirect contact with children.</p> <ul style="list-style-type: none"> <li>• <b>Direct Contact with Children:</b> Being with and in the physical presence of a child or children as part of their professional or school related work, be it regular, occasional, temporary or long term.</li> <li>• <b>Indirect Contact with Children:</b> Those whose work does not require them to be in the physical presence of a child but encompasses access to personal details and information, data on children including photographs, case files etc.</li> </ul> |
| <b>B-4) CONFORMITY WITH LAWS IN FORCE IN INDIA</b>                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1.                                                                                                    | This CPP is guided by the existing legal frameworks of child protection in India and the ratified international conventions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2.                                                                                                    | This CPP is in conformity with all relevant laws in force in India such as the Protection of Children from Sexual Offences Act, 2012, Bhartiya Nyaya Sanhita, 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.                                                                                                                                                                                                                                      |
| 3.                                                                                                    | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4.                                                                                                    | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.                                                                                                    | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 6.                                                                                                    | Any term not defined in this CPP, shall bear the meaning given to it under the relevant applicable law.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>B-5) OFFENCES AND OTHER ACTS COVERED UNDER THIS CPP</b>                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| The following offences and acts constitute the cause of action for making a complaint under this CPP: |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1.                                                                                                    | <p><b>Cyber Bullying:</b></p> <ul style="list-style-type: none"> <li>• Repeated, intentional, and harmful actions carried out using electronic communication devices or platforms, such as social media, emails, or messaging apps.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.                                                                                                    | <p><b>Cyber Stalking:</b></p> <ul style="list-style-type: none"> <li>• Persistent and unwanted online harassment or surveillance that causes distress or fear, including monitoring or tracking a person's online activities without their consent.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3.                                                                                                    | <p><b>Mental Harassment:</b></p> <ul style="list-style-type: none"> <li>• Actions that cause psychological distress, including intimidation, verbal abuse, threats, or manipulative behaviour.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| 4.  | <b>Penal Offence:</b> <ul style="list-style-type: none"> <li>Any crime or violation of the law as defined by the Indian Penal Code or other relevant legal statutes.</li> </ul>                                                                                |
| 5.  | <b>Physical Violence:</b> <ul style="list-style-type: none"> <li>Any act of physical harm or aggression towards an individual, including hitting, pushing, or other forms of bodily harm.</li> </ul>                                                           |
| 6.  | <b>Ragging / Bullying:</b> <ul style="list-style-type: none"> <li>Any form of intimidation, humiliation, or abuse, particularly in a school or college setting, often targeting new or junior members.</li> </ul>                                              |
| 7.  | <b>Sexual Assault:</b> <ul style="list-style-type: none"> <li>Any non-consensual sexual act, including touching, penetration, or any other form of sexual violence.</li> </ul>                                                                                 |
| 8.  | <b>Sexual Harassment:</b> <ul style="list-style-type: none"> <li>Unwelcome or inappropriate sexual advances, comments, or behaviours that create a hostile environment, including gestures, comments, or physical contact.</li> </ul>                          |
| 9.  | <b>Stalking:</b> <ul style="list-style-type: none"> <li>Repeated, unwanted attention or contact that causes fear or distress, including following or harassing an individual in person or through other means.</li> </ul>                                      |
| 10. | <b>Child Pornography:</b> <ul style="list-style-type: none"> <li>Any visual representation of minors engaged in sexually explicit conduct, which is illegal and subject to severe penalties under law.</li> </ul>                                              |
| 11. | <b>Neglect:</b> <ul style="list-style-type: none"> <li>Failure to meet the basic needs of a child. The policy applies to incidents occurring both on the school campus and during any activities organised by the School, whether on or off-campus.</li> </ul> |

#### B-6) COMPLAINT OF AN OFFENCE

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

- Any teacher
- Counsellor
- School Principal.
- Child Protection Officer

#### B-7) POCSO

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| 1. | <p>With respect to offences under POCSO, the School is duty bound to report the offence to the concerned law enforcement agencies in terms of Section 19 and Section 21 of the Act are reproduced as under:-</p> <p><b>19 Notwithstanding anything contained in the Code of Criminal Procedure, 1973:</b> (1) any person (including the child), who has apprehension that an offence under this Act is likely to be committed or has knowledge that such an offence has been committed, he shall provide such information to:- (a) the Special Juvenile Police Unit; or (b) the local police. (2) Every report given under sub-section (1) shall be— (a) ascribed an entry number and recorded in writing; (b) be read over to the informant; (c) shall be entered in a book to be kept by the Police Unit. (3) Where the report under sub-section (1) is given by a child, the same shall be recorded under sub-section (2) in a simple language so that the child understands the contents being recorded. (4) In case contents are being recorded in the language not understood by the child or wherever it is deemed necessary, a translator or an interpreter, having such qualifications, experience and on payment of such fees as</p> |
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|                                                                                              | <p>may be prescribed, shall be provided to the child if he fails to understand the same. (5) Where the Special Juvenile Police Unit or local police is satisfied that the child against whom an offence has been committed is in need of care and protection, then, it shall, after recording the reasons in writing, make immediate arrangement to give him such care and protection including admitting the child into shelter home or to the nearest hospital within twenty four hours of the report, as may be prescribed. (6) The Special Juvenile Police Unit or local police shall, without unnecessary delay but within a period of twenty-four hours, report the matter to the Child Welfare Committee and the Special Court or where no Special Court has been designated, to the Court of Session, including need of the child for care and protection and steps taken in this regard. (7) No person shall incur any liability, whether civil or criminal, for giving the information in good faith for the purpose of sub-section (1).</p> <p><b>21 Punishment for failure to report or record a case:</b> (1) Any person, who fails to report the commission of an offence under sub-section (1) of section 19 or section 20 or who fails to record such offence under sub-section (2) of section 19 shall be punished with imprisonment of either description which may extend to six months or with fine or with both. (2) Any person, being in-charge of any company or an institution (by whatever name called) who fails to report the commission of an offence under sub-section (1) of section 19 in respect of a subordinate under his control, shall be punished with imprisonment for a term which may extend to one year and with fine. (3) The provisions of sub-section (1) shall not apply to a child under this Act</p> <p>Where the complaining student and/ or parent(s) of such student, is of the view that the complaint constitutes a penal offence and should be forwarded to the concerned law enforcement agency, the School shall forward the same to the concerned law enforcement agency.</p> <p>The School will cooperate with the concerned law enforcement agencies inquiring into and/ or investigating complaints of penal offence(s).</p> <p>In the event the complaint does not fall within serial's above, the complaint shall be dealt with by the Child Protection Committee and procedures as established by the Disciplinary Committee shall be followed.</p> <p>The School will cooperate with the concerned law enforcement agencies inquiring into and/ or investigating complaints of penal offence(s).</p> <p>As per provisions contained in the POCSO Act 2012 the identity of any child who has been victim of sexual abuse will be kept strictly CONFIDENTIAL and the same should not be revealed/make public under any circumstances.</p> |
| <p align="center"><b>B-8) COMPLAINT REDRESSAL MECHANISM FOR CHILD SEXUAL ABUSE CASES</b></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1.                                                                                           | If a person has knowledge that an offence has been committed or belief or apprehension that an offence is likely to be committed, they must report to any member of the Child Protection Committee (CPC) or any senior member of the School.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.                                                                                           | Such persons as stated above should not conduct their own investigation or look into the matter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3.                                                                                           | There should not be any delay in reporting the matter to the CPC or any senior member of the School.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4.                                                                                           | The CPC must hold a meeting and immediately report the matter to the local police/ Special juvenile police unit/ Child helpline 1098/ State Commission for the protection of child rights.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5.                                                                                           | Minutes of the meeting should be maintained and signed by all members. A copy of the same should be shared with the authorities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6.                                                                                           | When the matter is closed or withdrawn for any reason whatsoever, the School must prepare a post-incident report/ closure report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p align="center"><b>B-8) CODE OF CONDUCT FOR STAFF</b></p>                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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, 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.

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 voices and views.
4. Educate children about their rights, and issues of abuse, neglect and exploitation.
5. Be supportive, caring and understanding of 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 behaviour.
8. Immediately report any suspicious behaviour/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, colour, gender, language, religion, nationality, ethnicity, disability or other status.
10. Comply with all relevant Indian and State legislation, including all child-related laws.

### **B-9) 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 or any other device and show them to children.
6. Browse, publish or transmit material in any form which depicts children engaged in a sexually explicit act or conduct.
7. Create text or digital images and/or collect, seek, browse, download, advertise, promote, exchange or distribute material in any electronic form depicting children in an obscene or indecent or sexually explicit manner.
8. Show or talk of content that is sexual in nature or takes photographs of children.
9. Behave physically in a manner which is inappropriate or sexually provocative.
10. Condone and/or participate in the behaviour 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

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|     | 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. | <b>Physical Contact:</b> Avoid any form of physical contact with a child that could make the child or any observer feel uncomfortable, or that might be perceived as a violation of boundaries. Exceptions: These guidelines do not apply in exceptional circumstances where immediate action is required, such as in cases of injury, natural disasters, health emergencies, or similar situations that necessitate evacuation or urgent care. |
| 16. | Refrain from engaging in any communication with a child, whether within or outside of school duties, that could make the child uncomfortable or might be seen by an observer as crossing boundaries. 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 behaviour – it is an employee's duty to report the matter to his/her Principals/CPC.                                                                                                                                                                                                                                                     |

#### B-10) ROLES AND RESPONSIBILITIES OF STUDENTS

|    |                                                                                                                                                                                                   |
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| 1. | Every student needs to follow the guidelines on safety and security issued by the school principal and teachers, from time to time.                                                               |
| 2. | In case, students observe tobacco/drug/related substances supply activities outside the school premises or inside the premises, they may inform the school authorities through the Complaint Box. |
| 3. | Senior Students may discuss various issues like bullying and sexual harassment with other younger students under the guidance of teachers                                                         |
| 4. | Act as peer support or peer educator for other students, wherever possible.                                                                                                                       |
| 5. | Stay physically active.                                                                                                                                                                           |
| 6. | Do not hesitate to seek support from teachers/Counsellors/parents when required.                                                                                                                  |

#### B-11) ROLES AND RESPONSIBILITIES OF SCHOOL NURSES

The school is responsible for all students and staff from the time of arrival at school, to the time of departure. This ensures adequate procedures are developed for the care of students and staff, in all aspects of safety and health. Responsibility include:

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| 1. | To provide education on important health issues such as sanitation, hygiene including menstrual hygiene, substance misuse, mental health and healthy nutrition (alternatives to junk food, importance of a balanced diet etc.). |
| 2. | To conduct annual health check-ups of 100% students and maintain the records of past medical history.                                                                                                                           |
| 3. | First Aid supplies are regularly monitored and a record is maintained for all medical supplies.                                                                                                                                 |
| 4. | Provide basic first aid training to academic and non academic staff                                                                                                                                                             |
| 5. | To maintain a record of students with special medical needs or medication requirements                                                                                                                                          |
| 6. | Monitor for medical signs of abuse/neglect                                                                                                                                                                                      |

### B-12) ROLES AND RESPONSIBILITIES OF PARENTS

|    |                                                                                                              |
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| 1. | Developing a friendly relationship with the child so as to have hesitation/fear-free dialogues               |
| 2. | Connecting with schools and school related activities so as to develop a symbiotic relationship.             |
| 3. | Regularly attending the Parent Teacher Meetings.                                                             |
| 4. | Following guidelines circulated by the school from time to time on child safety and security.                |
| 5. | Provide health, education, affection, nutrition, shelter, clothing, safe conditions, and proper supervision. |

### B-13) ROLES AND RESPONSIBILITIES OF WELL-BEING COUNSELLORS

|     |                                                                                                                                                              |
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| 1.  | <b>Child Safety Monitoring:</b> Ensure all children are safe from harm by actively monitoring their well-being.                                              |
| 2.  | <b>Risk Assessment:</b> Regularly assess potential risks to children's safety within the school or organization.                                             |
| 3.  | <b>Confidential Reporting:</b> Provide a secure and accessible system for reporting child safety concerns.                                                   |
| 4.  | <b>Response to Concerns:</b> Promptly address reports or suspicions of abuse, neglect, or safety concerns with appropriate actions.                          |
| 5.  | <b>Collaboration with Authorities:</b> Work with child protection services and law enforcement to handle incidents according to legal and ethical standards. |
| 6.  | <b>Support for Affected Children:</b> Offer emotional and psychological support to children affected by abuse, including referrals to specialised services.  |
| 7.  | <b>Education and Training:</b> Educate staff, parents, and children on child protection policies, recognizing abuse, and reporting procedures.               |
| 8.  | <b>Policy Development and Review:</b> Help develop and regularly review the child protection policy to ensure it follows best practices.                     |
| 9.  | <b>Record Keeping:</b> Maintain confidential records of all reports, investigations, and actions related to child protection.                                |
| 10. | <b>Promoting a Safe Environment:</b> Foster a secure environment where children feel valued and empowered to speak up.                                       |
| 11. | <b>Advocacy for Children's Rights:</b> Advocate for children's rights and well-being within the organization.                                                |
| 12. | <b>Communication with Parents:</b> Inform parents about child protection policies and any concerns regarding their children.                                 |
| 13. | <b>Emergency Response:</b> Act swiftly in emergencies to protect a child's safety.                                                                           |

### B-14) PREVENTION OF RAGGING AND BULLYING

|    |                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 1. | 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 |
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|                                                                                                                                                                                                                       | their knowledge should forthwith be brought to the knowledge of the Principal and/ or staff of the School/ CPC and that such complaints shall be promptly deal with while protecting the complainants from any harassment by the perpetrators of ragging.                                                                                                                                                                                                                                                          |
| <b>B-15) CHILD PROTECTION OFFICER (CPO) &amp; CHILD PROTECTION COMMITTEE (CPC)</b>                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| FS has a dedicated Child Protection Officer and is assisted in its function by a cross-section of members from Academic Staff, Non-academic staff, support, parents, students, wellbeing centre and external members. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>DUTIES OF CPO:</b>                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.                                                                                                                                                                                                                    | Receiving and acting upon any reported concerns                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.                                                                                                                                                                                                                    | Ensuring all staff are familiar with, and adhere to the Child Protection Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3.                                                                                                                                                                                                                    | Ensuring the policy is implemented and promoted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4.                                                                                                                                                                                                                    | Acting as a first point of contact for FS on issues of Child protection, both internally and for members of the public and other external contacts.                                                                                                                                                                                                                                                                                                                                                                |
| 5.                                                                                                                                                                                                                    | Representing the key link to statutory agencies. (Social care or Police or Media during and following formal investigations).                                                                                                                                                                                                                                                                                                                                                                                      |
| 6.                                                                                                                                                                                                                    | Maintaining and updating the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7.                                                                                                                                                                                                                    | Keeping up-to-date knowledge and understanding of the area of child protection, including attending appropriate training.                                                                                                                                                                                                                                                                                                                                                                                          |
| 8.                                                                                                                                                                                                                    | Ensuring all relevant information around Child Protection is communicated to the Child Protection Committee.                                                                                                                                                                                                                                                                                                                                                                                                       |
| 9.                                                                                                                                                                                                                    | Providing guidance on relevant matters to the Child Protection Committee and to the other members of staff, as appropriate.                                                                                                                                                                                                                                                                                                                                                                                        |
| 10.                                                                                                                                                                                                                   | Advocating the importance of Child Protection to all stakeholders.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 11.                                                                                                                                                                                                                   | CPO must undertake a Safety Walk of the entire school premises once every quarter, in order to ensure compliance with standard safety measures. As far as possible, all members of the CPC and all other stakeholders must be present during every safety walk.                                                                                                                                                                                                                                                    |
| 12.                                                                                                                                                                                                                   | It is important to note that whether or not a particular behaviour or action constitutes inappropriate behaviour will be a matter determined by the organisation, having regard to all of the circumstances, including past behaviour and allegations or suspicions related to such behaviour.                                                                                                                                                                                                                     |
| 13.                                                                                                                                                                                                                   | Every complaint regarding inappropriate behaviour or communication with a child shall be taken into consideration by the management of the school. However, whether or not a particular behaviour 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 decisions of the management of the school shall be final. |
| <b>COMPOSITION OF CHILD PROTECTION COMMITTEE</b>                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.                                                                                                                                                                                                                    | Chairperson - Head of School                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.                                                                                                                                                                                                                    | Child Protection Officer - Head Wellbeing Counsellor                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| 3. | Academic Head of the school        |
| 4. | Wellbeing Counsellor of the school |
| 5. | Safety Officer of the school       |

## ADVISORS

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| 1.  | Principal                                                            |
| 2.  | Academic Leadership Team Member                                      |
| 3.  | Parent (Senior School)                                               |
| 4.  | Parent (Junior School)                                               |
| 5.  | Student Representative (Senior School- Girl)                         |
| 6.  | Student representative (Senior School Boy)                           |
| 7.  | External Member ( Preferably a legal member/ Subject Matter Expert). |
| 8.  | Academic staff (Senior School)                                       |
| 9.  | Academic staff (Junior School)                                       |
| 10. | Ex Student (Alumni)                                                  |

## CHAPTER 3

### C) PREVENTIVE SECURITY MEASURES

FS recognizes the right of every student to a protective environment in the school premises, school buses and extended environments, free from acts of violence, bullying, sexual abuse, as defined in this Child Protection Policy. There is a dedicated 24 x 7 surveillance centre manned and monitored by the security staff. There are CCTV cameras placed at all common spaces of the school and a well-defined visitor management policy that is supplemented by physical security at all entrances, all floors & common spaces of the school.

#### C-1) RECRUITMENT

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| 1. | <b>Managerial/Administrative and Academic Staff (Responsibility HR)</b> <ol style="list-style-type: none"> <li>1. Recruitment and Selection Policy - Credibility and Safety: FS adheres to a “Recruitment and Selection Policy” aimed at ensuring that only credible and meritorious staff are recruited. This policy is designed to safeguard and promote the welfare of children by attracting and selecting candidates who are suitable for working with students.</li> <li>2. Recruitment and Selection Policy - Detering Unsuitable Candidates: The policy seeks to deter unsuitable candidates or volunteers from applying and ensures that those who are identified as unsuitable are not hired.</li> <li>3. HR Department Oversight - Leadership and Proactive Recruitment: The HR Department, led by a senior management member, is responsible for ensuring that the recruitment process</li> </ol> |
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|    | <p>attracts, selects, and retains staff who will positively contribute to the school's development and ensure the safety and welfare of students.</p> <ol style="list-style-type: none"> <li>References and Due Diligence - Reference Requirement: Applicants are required to provide two references. The HR Department conducts due diligence through detailed inquiries, including feedback from these references, before recruitment.</li> <li>Interview Process - Assessment Panel: Interviews are conducted by a panel that evaluates the applicant's attitude towards children and their ability to safeguard and promote the welfare of students at FS.</li> <li>Knowledge of Child Protection - Undertaking: Applicants are informed about the Child Protection Policy and must sign an undertaking stating that they have not been involved in any criminal proceedings or convicted by a court in the past.</li> <li>Background Checks - Police Verification: Background checks are mandatory, including obtaining a Police Verification Certificate. New employees must submit this verification before starting work.</li> <li>Training and Professional Development - Mandatory Training: Wellbeing Counsellors organise mandatory training programs on POCSSO and Cyber Security for all employees. External agencies may be involved if necessary, and attendance is recorded centrally.</li> <li>ID Card Policy - Display of ID Cards: All staff members are issued valid ID cards, which are colour-coded for different categories (managerial, academic, non-academic, contractual staff, and visitors). Displaying these ID cards at all times is mandatory.</li> </ol>                                                                                                                                                         |
| 2. | <p><b>Support Staff (Responsibility HR &amp; PROTEGO)</b></p> <ol style="list-style-type: none"> <li>Recruitment and Verification - HR Department Oversight: The HR Department ensures meticulous recruitment of support staff and workmen. This process involves hiring through PROTEGO and referrals from existing staff to maintain credibility.</li> <li>Recruitment and Verification - Clean Antecedents: The HR Department works to ensure that all support staff and workmen have clean backgrounds.</li> <li>Recruitment and Verification - Police Verification: Police verification is initiated upon the new employee joining and is conducted at the end of every month.</li> <li>Supervision and Monitoring - Supervision: Each support staff member and workman is supervised by a senior support staff member. This helps in monitoring their behaviour and ensuring adherence to legal and ethical standards.</li> <li>Supervision and Monitoring - Continuous Monitoring: Ongoing monitoring is in place to prevent any unlawful, unethical, or anti-social activities.</li> <li>Training and Awareness - Annual Training Programs: Regular training sessions on Child Protection, Prevention of Sexual Harassment, and Cyber Security are conducted as per the schedule outlined in Serial 1(a)(vii) Do's and Don'ts in School Premises," including principles such as the 'No touch policy.'</li> <li>Training and Awareness - Regular Briefings: Regular briefings are held to ensure that the concept of Child Protection is ingrained in the behaviour of support staff and workmen.</li> <li>Identity Card Policy - Carriage and Display: The policy on the carriage and display of identity cards is outlined in Serial 1(a)(viii) , ensuring that all support staff and workmen display their IDs at all times.</li> </ol> |
| 3. | <p><b>Professionals and Independent Contractors (Responsibility Hiring Agency in the School &amp; Security):</b></p> <ol style="list-style-type: none"> <li>Engagement and Background Checks - Credibility Assessment: Professionals and independent contractors are engaged only after thorough assessment of their credibility and background. Background checks and inquiries are conducted to ensure that they have clean antecedents and no past criminal record.</li> <li>Work Permits and Control - Work Permit System: When necessary, the work permit system is employed to maintain effective control over independent contractors and their staff, including workmen, supervisors, and employees.</li> <li>Physical Barriers and Signage - Work Area Barricades: Areas where work is underway are physically barricaded and marked with relevant signage to prevent unauthorized access.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>4. Movement and Supervision - Controlled Movement: The hiring department and school security ensure that the movement of contractors and labourers is restricted to their designated work areas. They are not allowed to loiter around the campus or come into contact with students.</p> <p>5. Movement and Supervision - Ongoing Monitoring: Contractor and labourer movement is continuously monitored to ensure compliance with campus regulations and to maintain a safe environment.</p>                                                 |
| 4.                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><b>Undertaking</b><br/>Child Protection Pledge and the declaration thereto is given at Appendix A to this policy. Detailed guidelines given in SOP on hiring of staff and SOP on code of conduct.</p>                                                                                                                                                                                                                                                                                                                                          |
| <p style="text-align: center;"><b>C-2) MONITORING VISITORS (RESPONSIBILITY SAFETY &amp; SECURITY DEPARTMENT)</b></p>                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1.                                                                                                                                                                                                                                                                                                                                                                                                                    | As a part of preventive measures for safety and security of students of FS, visits by outsiders are strictly regulated.                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                    | Visitors management system has been introduced whereby the visitor has only controlled access.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3.                                                                                                                                                                                                                                                                                                                                                                                                                    | Chauffeur driven staff cars will be parked outside the school campus during all times( to include School working days and non working days).                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4.                                                                                                                                                                                                                                                                                                                                                                                                                    | Self driven cars will be permitted to park at the pre-designated parking area beyond Gate1, subject to availability of parking space.                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5.                                                                                                                                                                                                                                                                                                                                                                                                                    | Only vehicles carrying visitors with special needs will be permitted to move up to Ramp in Building No 1.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6.                                                                                                                                                                                                                                                                                                                                                                                                                    | No overnight parking visitor/ faculty vehicle is to be permitted within the school premises. Permission granted only under exceptional circumstances by the Management committee. The permission will not exceed beyond 24hrs.                                                                                                                                                                                                                                                                                                                    |
| 7.                                                                                                                                                                                                                                                                                                                                                                                                                    | Detailed guidelines given in SOP on Visitors to the School and SOP on Parking Management.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p style="text-align: center;"><b>C-2) SAFETY &amp; SECURITY DURING TRANSIT (RESPONSIBILITY PROTEGO)</b></p>                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>FS endeavours to ensure that school transport is safe and secure in every way. All guidelines enacted are strictly adhered to and constant endeavour is made to upgrade technology and security measures to ensure safe and monitored movement of children. Application of this policy is restricted to transport contracted by School and <b>DOES NOT APPLY TO CHILDREN TRAVELLING UNDER OWN ARRANGEMENT.</b></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1.                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><b>Selection &amp; Recruitment of Drivers:</b> PROTEGO conducts due diligence before recruiting school bus drivers and conductors The following is ensured:</p> <ul style="list-style-type: none"> <li>• Drivers selected possess valid driving licence with minimum 5 years experience of driving a heavy vehicle such as a bus.</li> <li>• Detailed medical examination.</li> <li>• Driving test.Police verification prior to joining.</li> <li>• No significant previous record of traffic offences, challans or other offences.</li> </ul> |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><b>Training of Drivers:</b> In addition to mandatory training activities for all Staff members, the school bus drivers are trained to strictly follow traffic rules and inculcate safe driving habits.</p>                                                                                                                                                                                                                                                                                                                                     |
| 3.                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><b>Bus Routes:</b> Bus routes have been demarcated and stops have been selected and numbered. Routes have been selected in a way to ensure the fastest move of students to school without causing delay. Buses will ply only on the specified routes and stop at the predesignated stops.</p>                                                                                                                                                                                                                                                  |

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|                                                                       | Variation if any will be only on account of exigency/ un for-seen circumstances. Changes will occur only on obtaining concurrence of the Transport in charge and the Parents will be informed immediately.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4.                                                                    | Un- Authorised Commuters - It has been reiterated to the staff on board the bus to also include Academic Staff if on board that under no circumstances shall a person, other than those manifested to travel, be permitted to board the Bus at any stage . It will also ensure that the Bus is under no circumstances permitted to ferry goods or material of any person including that of Managerial, Academic/ Non Academic and Support staff.                                                                                                                                                                                                                                                                                         |
| 5.                                                                    | Every school bus in FS has 4 CCTVs, GPS tracking system, Bus Lady Attendant, Two fire fighting extinguishers, speed governors, first aid kit, emergency contact list and emergency gate clearly earmarked. Constant monitoring of the Bus is done at the School ensuring compliance of all guidelines and directions.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6.                                                                    | All buses are painted in yellow and have the words 'School Bus', name of school and route number are displayed prominently. The school buses have painted on it valid telephone numbers of the bus-in-charge as well as the school authorities/Admin head for feedback in case of improper driving.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 7.                                                                    | Orderly boarding and de-bussing is ensured by the Bus Staff and the School security. Every bus has mandatory one female helper/Didi present on the route. Routing is done in a manner that the first and last female child is accompanied by a Didi. Thus ensuring the presence of an adult female throughout the journey.                                                                                                                                                                                                                                                                                                                                                                                                               |
| 8.                                                                    | Attendance of all students on the route is ensured by the Didi in charge of the bus at the start of the journey, at the time of departure and at the time of disembarking from the bus.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 9.                                                                    | In case there is a request during school hours to pick up a child (who regularly uses the bus) due to an emergency, such exits are permitted only on receipt of email from the Parent to the front desk/ class teacher. Post verification of the request and establishing identity of the person nominated for the pickup by the parent/ guardian (followed by a confirmatory telephone call- if being picked up by a person other than a Parent) will a child be permitted to leave the School. with the authorised exit slip duly signed by the respective programme coordinator/ and countersigned by the front desk after the consent of the respective Parents.                                                                     |
| 10.                                                                   | The School Transport In-charge ensures that the bus is driven only by the authorised driver always on the route by viewing bus CCTV footage on a regular basis.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 11.                                                                   | <b>Incident Reporting &amp; After Action:</b> Due action is taken against any driver/conductor where warranted, which may include removal of the driver from services if it is a case of dangerous driving or inappropriate conduct. These complaints are reviewed by the Administrator of the school. The person who has made the complaint is informed of the action taken based on the complaint within 7 days.                                                                                                                                                                                                                                                                                                                       |
| 12.                                                                   | <b>Detailed guidelines and responsibilities of all stakeholders given in SOP on School Bus Management.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 13.                                                                   | Following has been instituted for all FS busses and its implementation is being ensured without any exception: <ul style="list-style-type: none"> <li>• No bus to have curtains or dark films. All buses have internal white lighting and activities in the bus are visible from outside.</li> <li>• All buses have a valid certificate of fitness, pollution and insurance certificate.</li> <li>• The bus is to carry children permissible as per capacity and permit.</li> <li>• Transport in charge will ensure mechanical fitness of all Buses prior to pick and drop duties. Any Bus not meeting the road worthiness criteria will be pulled out of service and the stand by bus will be pressed into service promptly.</li> </ul> |
| <b>C-3) DIGITAL SURVEILLANCE (RESPONSIBILITY SECURITY &amp; I.T.)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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| 1. | CCTV cameras have been installed at numerous places in the campus, with a monitoring control room that has an incident/ suspicious movement recording log book. There are ample number of CCTV cameras strategically installed at different points in the campus so as to minimise any probable chances whereby safety and security of students, staff and visitors, may be compromised. <b>Detailed guidelines and responsibilities of all stakeholders given in SOP on Security Policy.</b> |
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#### **C-4) WASHROOMS (RESPONSIBILITY HOUSEKEEPING & SECURITY)**

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 1. | FS recognizes that washrooms are places where students are vulnerable to being victimized by bullying, stalking, physical violence, sexual abuse etc. and hence FS endeavours to create a foolproof security mechanism in and around washrooms on the FS premises which is meant for students. FS endeavours to ensure total safety for its children (especially Primary school children) in and around the washrooms on the campus. |
| 2. | Academic staff use the same washrooms as students which ensures natural surveillance.                                                                                                                                                                                                                                                                                                                                                |
| 3. | CCTV cameras have been installed in such a manner that the security personnel deputed for monitoring purposes can monitor the entry and exit of all the washrooms and deter vandalism and the housekeeping staff has been instructed to always keep the washrooms lights switched on.                                                                                                                                                |

#### **C-5) CYBER SECURITY (RESPONSIBILITY I.T. HARDWARE & NETWORK)**

FS is committed to providing a safe and healthy environment, in which all the students are treated fairly, with dignity and respect. Any kind of cyber issues initiated by other students is a risk to the health and safety of the students.

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| 1. | The Cyber Security policy of FS outlines its commitment to a safe school and is aimed at ensuring, so far as it reasonably can, that students are not subjected to any kind of cyberbullying/ harassment when at school. It also details the responsibilities of the School staff, management and parents in relation to preventing cyber issues at school or anywhere as cyber issues are not limited to school boundaries.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2. | The school is committed to investigating all cyber issues in a manner that protects the rights of all involved, including the alleged perpetrators.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3. | Legal Consequences. Acts of violation of privacy, hacking, cyberbullying, sexting etc can be considered cyber crimes and are punishable by law. The school will cooperate fully with the authorities if any such case is reported. Depending upon the nature of the offence, various laws apply including: <ul style="list-style-type: none"> <li>• The Protection of Children from Sexual Offences Act, 2012 (POCSO) is a legal framework for the protection of children from sexual offences. It also contains the legal enablement for tackling cyber crime against children such as cheating, cyberstalking, cyberbullying, defamation, grooming, hacking, identity theft, violation of privacy etc.</li> <li>• Various sections (292, 354, 383, 384, 385, 397, 416, 417, 419, 420, 469, 499, 500, 503, 506, 507, 509) of the Indian Penal Code (IPC), 1860 Sections 43, 66E, 67, 72 of the Information Technology (IT) Act, 2000 and Immoral Trafficking (Prevention) Act, 1956.</li> </ul> |

## **CHAPTER 4**

### **D) MONITORING, ASSESSMENT & DISSEMINATION**

### **D-1) CONTINUOUS ASSESSMENT AND MONITORING OF CPP**

|    |                                                                                                                                                                                                                                                                                                                                                                                            |
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| 1. | This CPP shall be comprehensively assessed annually so as to improvise it. It may be revised or amended from time to time, by the Management of the School or by a committee appointed for this purpose.                                                                                                                                                                                   |
| 2. | An audit called “Child Safety Check” shall be conducted biannually by a committee constituted by the 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.                                                                            |
| 3. | Actions required to be taken under this CPP, such as forwarding the complaint of a penal offence 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 appointed for this purpose by the Management of the School. |
| 4. | The School has presently allocated responsibilities for the protection of its students to the members of the Child Protection Committee.                                                                                                                                                                                                                                                   |

### **D-2) DISSEMINATION**

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| 1. | A copy of the “ Child Protection Plan “ has been uploaded on the “LIGHTHOUSE” available on FSApps and on Fountainhead School Website.                                                       |
| 2. | “ Child Protection Plan “ is available in English, Hindi and Gujarati for all stakeholders in the School i.e Students, Parents and Employees of FountainHead School to read and understand. |
| 3. | HR will ensure that all employees read the Policy. Certificates to this effect will be rendered by all employees.                                                                           |

## **APPENDIX A**

### **CHILD PROTECTION PLEDGE**

As an employee of Fountainhead School, Surat I accept to:

- Prioritise Child Welfare: Give prime importance to the welfare of the child.
- Be Vigilant: Be observant of signs and symptoms of abuse as mentioned in the Child Protection Policy.
- Participate in Training: Actively participate in all trainings/sessions on child safety conducted by the school or selected organisations.
- Cooperate in Safeguarding Actions: Work cooperatively in actions required to safeguard the children.
- Work with Parents: Collaborate with parent(s) to ensure the child’s safety.
- Share Relevant Information: Support and share any information with relevant persons that can help the school and the child.
- Be Rational and Non-Judgmental: Maintain a rational and non-judgmental approach with each child.
- Understand Confidentiality: Respect the confidentiality associated with all issues concerning a child except in cases where there is suspected or reported harm when reporting to proper authorities is mandatory.
- Promote Well-Being: Work towards achieving the well-being of the child.
- Seek Help When Needed: Ask for help if I cannot handle a situation with a child at any given time.
- Ensure Safety: View the safety of all children of Fountainhead School as my duty and responsibility on campus or on school trips.

- Report Risk or Harm: Be alert and report any behaviour that indicates a child being at risk or harm.
- Prevent Inappropriate Behaviour: Never allow any kind of inappropriate behaviour by children or any other employee.

### **DECLARATION**

I undertake to strictly follow the rules, regulations, and guidelines contained in the “Child Protection Policy” as a condition of my services to Fountainhead School, Surat. My signature confirms that I have read, understood and will abide by the Child Protection Policy of Fountainhead School, Surat. As a person employed by Fountainhead School, Surat and working with the Student (either directly or indirectly) agree to follow these standards without exception.

I understand that any action of mine if inconsistent with this “Child Protection Policy” or failure to take action mandated by the “ Child Safety Pledge” or legislations mandated by the Union of India or State legislations (referred to within the Child Protection Policy or not) may result in disciplinary action upon me to also include dismissal.

I also declare that I have read and understood the Child Protection Policy in \_\_\_\_\_( English/ Gujarati/ Hindi).

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

|                                                                                   |                                                                                   |
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| <b>Witness 1</b><br><br><b>Name:</b><br><br><b>Signature:</b><br><br><b>Date:</b> | <b>Witness 2</b><br><br><b>Name:</b><br><br><b>Signature:</b><br><br><b>Date:</b> |
| <b>COUNTERSIGNED<br/>(HR DEPARTMENT)</b>                                          |                                                                                   |