



**BILLABONG HIGH**  
INTERNATIONAL SCHOOL

# **COMPREHENSIVE CHILD PROTECTION POLICY**

## TABLE OF CONTENTS

S. NO.	CONTENTS	Page
1	POLICY STATEMENT	4
2	PREAMBLE	6
3	COMMENCEMENT	7
4	<b><u>Chapter -1:</u></b>	
	DEFINITIONS	8
5	<b><u>Chapter – 2:</u></b>	
	CONFORMITY WITH LAWS IN FORCE	12
6	<b><u>Chapter – 3:</u></b>	
	OFFENCES AND OTHER ACTS COVERED UNDER THIS CPP	13
7	<b><u>Chapter – 4:</u></b>	
	EXTENT OF CPP	15
8	<b><u>Chapter – 5:</u></b>	
	COMPLAINT OF A PENAL OFFENCE	17
9	<b><u>Chapter – 6:</u></b>	
	OTHER COMPLAINTS	21

<b>10</b>	<b><u>Chapter – 7:</u></b>	
	DISCIPLINARY ACTIONS FOR STUDENTS	23
<b>11</b>	<b><u>Chapter – 8:</u></b>	
	ACTS AND OFFENCES IN EXTENDED ENVIRONMENTS	24
	<b><u>Chapter – 9:</u></b>	
<b>12</b>	PREVENTIVE MEASURES	25
<b>13</b>	<b><u>Chapter – 10:</u></b>	
	EMOTIONAL GROWTH AND AUGMENTATION	45
<b>14</b>	<b><u>Chapter – 11:</u></b>	
	CONTINUOUS ASSESSMENT OF CPP	47
<b>15</b>	<b><u>Chapter – 12:</u></b>	
	MONITORING OF CPP	49
<b>15</b>	<b><u>Chapter – 13:</u></b>	
	AMENDMENT OF CPP	50

## **Policy Statement**

BHIS, Andheri 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. This Child Protection Policy (CPP) addresses multiple dimensions of the vulnerability faced by the child during the entire cycle of engagement with a school.

BHIS, Andheri believes that every child who participates in the school activities has the right to enjoy a safe environment and be protected from harm. We believe that the welfare of children is the highest priority and that it is the responsibility of everyone in BHIS 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 BHIS. 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.

This Child Protection Policy focuses on the development of children by providing them a safe and caring environment in school campus/school trips. It provides guidelines to protect BHIS, Andheri students from Physical Violence, Mental Harassment and Sexual Abuse. This Policy covers abuse, harassment, and offences that can occur in school campus and in premises under control of the Institution, as well as extended environments such as travel (hotel, camps, school trips, conferences, inter-school activities, events etc.) including the modes of transport, such as, buses, trains, cars and airplanes i.e. the areas where students are under the supervision of BHIS' staff. It could be during school hours or after school hours till the time students are in interaction with the employees of the school. Child Protection Policy (CPP) aims to protect BHIS' students and applies to BHIS, Andheri Staff/ Teachers/ Visitors/ Parents/ Visiting Faculty/ Third Party Service Providers who

directly interact with students of BHIS, Andheri on campus or on school trips.

BHIS, Andheri promotes a Child-Rights friendly atmosphere that is non-discriminatory, humane, and considerate and protects the best interest of each child. The school has a Child Sensitive Environment, where a child feels comfortable and be herself/himself without inhibition, and is non- threatening.

## **PREAMBLE**

● BHIS recognizes the right of every student to an environment in the school premises, school buses and such extended environments, free from acts of violence, bullying, sexual abuse etc., as defined in this Child Protection Policy;

● BHIS is committed to ensuring maximum safety to every BHIS student from acts of violence, bullying, sexual abuse etc., in the school premises, school buses and such extended environments, as defined in this Child Protection Policy, by taking necessary preventive measures;

● BHIS follows a 'zero tolerance' approach to any act of violence, bullying, sexual abuse etc., in the school premises, school buses and such extended environments, as defined in this Child Protection Policy.

BHIS is committed to supporting any/ every BHIS student/ parent who makes a complaint of acts of violence, bullying, sexual abuse etc., in the school premises, school buses and such extended environments, as defined in this Child Protection Policy, against another student, teacher, other members of the staff, workmen, professionals, independent contractors/ their staff engaged by BHIS to work in the school premises, school buses and such extended environments as stipulated in this Child Protection Policy, as well as visitors to the school premises, by forwarding the complaint to the law enforcement agencies or becoming a co-complainant as the case may be, so as to ensure that justice is done to the complaining student/ parent(s);

BHIS is committed to extending cooperation to the law enforcement agencies inquiring into and/ or investigating complaints, by giving requisite evidence including CCTV footages etc. as and when requested / directed by the law enforcement agencies in writing and in accordance with law.

***This CPP is based on inputs taken inter alia from the laws in force in India such as the Indian Penal Code, 1860, POCSO Act, 2012, and Information Technology Act, 2000.***

## **COMMENCEMENT**

**The Child Protection Policy (in short 'CPP') shall come into force with effect from 1<sup>st</sup> Day of July 2018.**

## **Chapter – 1**

### **DEFINITIONS**

In this Policy, unless the context otherwise requires, -

- (i) “Child” means a student admitted and enrolled in BHIS, Andheri is located anywhere in India;
- (ii) “Child Abuse” is any deliberate behaviour or action which includes all forms of physical violence, mental harassment and sexual abuse that results in actual or potential harm to the child’s health, development or dignity and endangers child safety;
- (iii) “Complainant” means a student of BHIS who complains of any act or penal offence covered in Chapter–3 of this CPP and includes the parent(s) of such student;
- (iv) “Complaint” means any allegation in writing of an act or penal offence covered in Chapter–3 of this CPP;
- (v) “Communication Device” has the same meaning as assigned to it in Section 2(1)(ha) of Information Technology Act, 2000;<sup>1</sup>

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<sup>1</sup> “Communication device” means cell phones, personal digital assistance or combination of both

*or any*

*other device used to communicate, send or transmit any text, video, audio or image.*

- (vi) “Computer” has the same meaning as assigned to it in Section 2(1)(i) of Information Technology Act, 2000;<sup>2</sup>
- (vii) “Computer Network” has the same meaning as assigned to it in Section 2(1)(j) of Information Technology Act, 2000;<sup>3</sup>
- (viii) “Cyber Bullying” means any form of intimidation or harassment, using a computer, communication device or computer network or the Internet;
- (ix) “Mental Harassment” means and includes insults, ridicule, humiliation, name-calling and repeated threats to cause physical violence to a child;
- (x) “Penal Offence” means any offence that is punishable under the law with corporal punishment and/ or fine, such as, offences defined and punishable under the Indian Penal Code, 1860 and/

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<sup>2</sup> *“Computer” means any electronic, magnetic, optical or other high-speed data processing device or system which performs logical, arithmetic, and memory functions by manipulations of electronic, magnetic or optical impulses, and includes all input, output, processing, storage, computer software or communication facilities which are connected or related to the computer in a computer system or computer network.*

<sup>3</sup> *“Computer network” means the inter-connection of one or more computers or computer*

*systems or communication device through– (i) the use of satellite, microwave, terrestrial line, wire, wireless or other communication media; and (ii) terminals or a complex consisting of two or more interconnected computers or communication device whether or not the inter-connection is continuously maintained.*

or POCSO Act, 2012 and/or the Juvenile Justice Act or any other law in force on the date of the incident;

- (xi) “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;
- (xii) “Bullying” or “Ragging” means any disorderly conduct whether by words spoken or written or by an act which has the effect of teasing, treating or handling with rudeness any other student, indulging in rowdy or undisciplined activities which causes or is likely to cause annoyance, hardship or psychological harm or to raise fear or apprehension thereof in a fresher or a junior student or asking the students to do any act or perform something which such student will not do in the ordinary course and which has the effect of causing or generating a sense of shame or embarrassment so as to adversely affect the physique or psyche of a fresher or a junior student. The cause of indulging in ragging is deriving a sadistic pleasure or showing off power, authority or superiority by the seniors over their juniors or freshers;<sup>4</sup>

(xiii) “Sexual Assault” has the same meaning as assigned to it in Section 7 of POCSO Act, 2012;<sup>5</sup>

(xiv) “Sexual Harassment” has the same meaning as assigned to it in Section 11 of POCSO Act, 2012;<sup>6</sup>

“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;

<sup>4</sup> *Vishwa Jagriti Mission Versus Central Govt. : Before Justice R.C. Lahoti & Justice Brijesh Kumar : (2001) 6 SCC 577.*

<sup>5</sup> *Sexual assault : Whoever, with sexual intent touches the vagina, penis, anus or breast of the child or makes the child touch the vagina, penis, anus or breast of such person or any other person, or does any other act with sexual intent which involves physical contact without penetration is said to commit sexual assault.*

<sup>6</sup> *Sexual harassment : A person is said to commit sexual harassment upon a child when such person with sexual intent,- (i) utters any word or makes any sound, or makes any gesture or exhibits any object or part of body with the intention that such word or sound shall be heard, or such gesture or object or part of body shall be seen by the child; or (ii) makes a child exhibit his body or any part of his body so as it is seen by such person or any other person; or (iii) shows any object to a child in any form or media for pornographic purposes; or (iv) repeatedly or constantly follows or watches or contacts a child either directly or through electronic, digital or any other means; or (v) threatens to use, in any form of media, a real or fabricated depiction through electronic, film or digital or any other mode, of any part of the body of the child or the involvement of the child in a sexual act; or (vi) entices a child for pornographic purposes or gives gratification therefor.*

## **CHAPTER – 2**

### **CONFORMITY WITH LAWS IN FORCE**

- 2.1 This CPP is in conformity with the relevant laws such as The POCSO Act, 2012, The Indian Penal Code, 1860, The Juvenile Justice Act and The Information Technology Act, 2000.
- 2.2 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.
- 2.3 In the event this CPP doesn't cover any legal compliance requirement on the subject of child protection, the same shall be deemed to be a part of this CPP and BHIS shall be duty-bound to follow the same.

## **CHAPTER – 3**

### **OFFENCES AND OTHER ACTS COVERED UNDER THIS CPP**

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

- a) Cyber Bullying
- b) Cyber Stalking
- c) Mental Harassment
- d) Penal Offences
- e) Physical Violence
- f) Ragging / Bullying
- g) Sexual Assault
- h) Sexual Harassment
- i) Stalking

The aforesaid acts are defined in the Definitions clause of Chapter-1.

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

causing grievous hurt to a BHIS student is covered under the Indian Penal Code, 1860 and is a penal offence. Also, it would be covered in the a fore said category of 'physical violence'.

## **CHAPTER – 4**

### **EXTENT OF CPP**

4.1 This CPP extends to the following areas:

- a) BHIS, Andheri campus/ premises
- b) BHIS, Andheri buses
- c) Extended environments:

Places other than (a) and (b) mentioned above, where the student is under the direct supervision of BHIS, such as, school camps, school trips, school conferences, inter-school activities, events etc. including the mode of travelling by buses, trains, cars and airplanes. It could be during school hours or after school hours till the time students are under the supervision of the employees of the school.

4.2 This CPP applies to every BHIS' student and his parent(s) who complain of acts and offences covered in Chapter–3.

4.3 This CPP applies to the following persons against whom a complaint may be made by the complainant:

- a) Another student of BHIS, Andheri

- b) Teachers of BHIS, Andheri
- c) Staff and workmen of BHIS, Andheri
- d) Professionals, independent contractors/ their staff engaged by BHIS to work in the school premises, school buses and such extended environments as stipulated in this Child Protection Policy
- e) Visitors to BHIS, Andheri

## **Chapter – 5**

### **COMPLAINT OF A PENAL OFFENCE**

5.1 A complaint in writing by a student of BHIS 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: -

- a) Form Tutor/IC/any teacher
- b) Counsellor
- c) School Principal/Deputy Principal
- d) Child Protection Officer

5.2 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, BHIS shall forward the same to the concerned law enforcement agency.

- 5.3 If the complaining student and/ or parent(s) of such student believe that a penal offence has been committed and no legal opinion is required and BHIS agrees that a penal offence has been committed, then BHIS will become a co-complainant if the complaining student and/ or parent(s) of such student so desire.
- 5.4 If BHIS does not agree with the complaining student and/ or parent(s) of such student, that a penal offence has been committed, BHIS shall take a legal opinion on the issue and forward the same to the complaining student and/ or parent(s) of such student. BHIS will act in accordance with the opinion.

5.5 BHIS will cooperate with the concerned law enforcement agencies inquiring into and/ or investigating complaints of penal offence(s) including giving evidence such as providing CCTV footages, other electronic evidence, giving statements, handing over relevant documents etc. as and when requested / directed by the law enforcement agencies in writing and in accordance with law.

5.6 If any member of the staff of BHIS including teachers, workmen, professionals, independent contractors/ their staff engaged by BHIS to work in the school premises, school buses and such extended environments as stipulated in this Child Protection Policy, is named as an accused in an F.I.R. or during investigation or in a Charge sheet or a summoning order or order on charge, appropriate action shall be taken by BHIS as may be deemed

necessary.

- 5.7 The student against whom a complaint is made under this Chapter shall in addition to action under the aforesaid clauses 5.1 – 5.7 stated above, be also dealt with under the Chapter-7 of this Child Protection Policy.
- 5.8 With respect to offences under POCSO (The Protection Of Children From Sexual Offences Act, 2012), BHIS is duty bound to report the offence to the concerned law enforcement agencies in terms of Section 197 and Section 218 of the Act. BHIS shall report POCSO offences to the stipulated authorities.

## **Chapter – 6**

### **OTHER COMPLAINTS**

6.1 A complaint in writing by a student of BHIS and/ or parent(s) of such student complaining of any act that does not constitute a penal offence under the law may be handed over to either of the following persons: -

- a) Form Tutor/IC/any teacher
- b) Counsellor
- c) School Principal/Deputy Principal

6.2 The aforesaid complaint made in terms of aforementioned clause 6.1 shall be referred to: -

- a) Child Protection Officer

And shall be dealt with in accordance with Chapter-7 of this Child Protection Policy.

6.3 A complaint in writing by a student of BHIS and/ or parent(s) of such student complaining of certain acts that amount to a penal

offence under the law as well as acts that do not constitute a penal offence under the law may be handed over to either of the following persons:-

- a) Form Tutor/IC/any teacher
- b) Counsellor
- c) School Principal/Deputy Principal
- d) Child Protection Officer

Appropriate action on such complaints shall be taken as provided in Chapter-5 and Chapter-7 of this CPP.

- 6.4 In a case where a teacher observes or finds out whether by a disclosure by the affected student or otherwise, that a penal offence or an act that does not constitute a penal offence (such as ragging / bullying etc.) has been committed against such affected student, it shall be reported to the Counselor of BHIS. The Counselor shall forward such information to the Principal of BHIS. Appropriate action under Chapters 5 and 6 of this CPP, as the case may be, shall be taken in the matter.

## **Chapter – 7**

### **DISCIPLINARY ACTIONS FOR STUDENTS**

- 7.1 Without prejudice to the action taken against a student accused of a penal offence in terms of Chapter–5 of this CPP, strict and immediate disciplinary action including Suspension and Expulsion shall also be taken by the school authorities in their discretion depending upon the gravity of the alleged penal offence. It is clarified that disciplinary action shall not await the verdict of conviction by the competent court.
- 7.2 In cases of other complained acts (other than a ‘Penal Offence’) as provided in Chapter–6, against a student not accused of penal offence, disciplinary action by the school authorities shall be taken in their discretion. BHIS shall fairly decide upon the complaint, after hearing both the sides i.e. the Complainant child and the child / other persons against whom the complaint is made.
- 7.3 Action on hybrid complaints covered in clause 6.3 above, shall be taken in terms of Chapter–5 and Chapter-7 of this CPP.

## **CHAPTER – 8**

### **ACTS AND OFFENCES IN EXTENDED ENVIRONMENTS**

- 8.1 Where the act and/ or offence complained of is committed in an extended environment against a BHIS' student and the person accused is not covered in clause 4.3, clauses 5.1 – 5.7 shall apply if the act complained of is a penal offence.
- 8.2 Where the act complained of falls in Chapter–6 and the complaining student and/ or parent(s) of such student are desirous of disciplinary action, BHIS shall initiate enquiry and take appropriate disciplinary action in the matter.

## **CHAPTER – 9**

### **PREVENTIVE MEASURES**

9.1 BHIS recognizes the right of every student to a protective environment in the school premises, school buses and such extended environments, free from acts of violence, bullying, sexual abuse etc., as defined in this Child Protection Policy.

9.2 With a view to ensuring maximum safety to every BHIS student from acts and penal offences enlisted in Chapter-3 above, in the school premises, school buses and such extended environment, as defined in this Child Protection Policy, BHIS has installed a strong security system to prevent the commission of the aforesaid acts and penal offences. (mentioned in Chapter-3 above)

### **9.3 Recruitment and monitoring:-**

#### **(A) MANAGERIAL/ADMINISTRATIVE AND ACADEMIC STAFF:-**

9.3.1 BHIS has a “Recruitment and Selection Policy” for recruitment of administrative and academic staff in the school. BHIS strongly believes that the first step to safeguarding and promoting the welfare of children in the

school, is to ensure recruitment of credible staff. As per the BHIS' policy, recruitment of meritorious and credible staff is significant for ensuring the safety of children. As per the aforesaid policy, BHIS endeavours to attract the best possible candidates to fill the vacancies in the administrative and academic staff. The policy seeks to deter prospective candidates/ volunteers who are unsuitable to fill the vacancies, from applying for the same. BHIS endeavours to identify and reject those candidates/ volunteers who are unsuitable to work with students of BHIS.

9.3.2 BHIS has an HR Department which is headed by a senior member of the Management. The HR Department pro-actively works to ensure meritorious and credible recruitment of teaching and administrative staff. The HR Department ensures that the recruitment process attracts, selects and retains staff who would successfully and positively contribute to the future development of the

school apart from looking after the safety and welfare of the students.

9.3.3 With a view to ensure selection of meritorious and credible teaching and administrative staff, two references are required by an applicant. Due diligence through detailed enquiries are made, including feedback from the references, before the applicant is recruited as a member of the teaching/ administrative staff.

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

9.3.5 The HR Department of BHIS also does background checks of the applicants.

9.3.6 Annually, training programmes on Prevention of Sexual Harassment and Cyber Security etc. are conducted by reputed training agencies, for managerial/administrative

and academic staff working at BHIS and for Students and Parents.

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

**(B) SUPPORT STAFF AND WORKMEN:-**

9.3.8 The HR Department takes utmost care before recruiting the support staff and workmen at BHIS, Andheri.

9.3.9 Support staff and workmen are employed by BHIS, mostly on the referral of the existing support staff and workmen, so as to ensure credibility of the recruitment process. The HR Department endeavours to ensure that the support staff and workmen sought to be inducted, have clean antecedents. The office of the School Director/ General Manager pro-actively participates and conducts interviews, before recruitment of support staff and workmen.

9.3.10 A police verification request is generated before the applicant is asked to join in for his/ her duties in the school.

- 9.3.11 Every support staff member and workman remains under the supervision of a senior support staff member. Support staff and workmen are constantly monitored to ensure that they do not indulge in any unlawful or unethical or anti- social activities.
- 9.3.12 Annually, training programmes on Prevention of Sexual Harassment and Cyber Security etc. are conducted by reputed training agencies, for support staff and workmen working at BHIS.
- 9.3.13 The support staff and workmen are continuously made aware of “Do’s and Don’t(s) in School Premises” which covers principles such as ‘No touch policy’, etc.
- 9.3.14 Briefing on Do’s and Don’t(s) is done on a regular basis so as to ensure that the concept of Child protection is ingrained in the minds and behaviour of support staff and workmen.
- 9.3.15 Every member of the staff is given an ID Card which he/ she must carry all the time mandatorily.

**(C) PROFESSIONALS AND INDEPENDENT CONTRACTORS:-**

9.3.16 Professionals and independent contractors are engaged by BHIS, after assessing their credibility and background. Background checks and enquiries are conducted before engaging them at BHIS. BHIS endeavour to ensure that professionals and independent contractors have clean antecedents without any past criminal record.

9.3.17 Lanyards are issued to workmen etc., with a view to clearly identify them in the school campus.

9.3.18 Whenever necessary, the system of Work Permits is followed so that there is effective control over independent contractors and their workmen, staff, employees, supervisors etc.

9.3.19 Areas where work is under progress, is physically barricaded with all the relevant signages.

**(D) MONITORING VISITORS:-**

9.3.20 As a part of preventive measures for safety and security of students of BHIS, visits to the school by outside visitors

is strictly regulated. Visitors management system has been introduced whereby the visitor has only controlled access and a written confirmation to the security for having met the concerned person only.

9.3.21 Chauffer driven staff cars are parked outside the school campus during school hours.

#### **9.4 School Buses:-**

9.4.1 BHIS endeavours to ensure that school buses that carry the students to the school and back home are safe and secure in every way.

9.4.2 For the safety and security of BHIS students in the school buses, the role of the staff manning the school buses assumes critical importance and hence the same is taken care of by BHIS.

9.4.3 All school buses have qualified drivers and conductors.

BHIS ensures that all bus drivers possess a valid Driving licence with minimum 5 years experience of driving a heavy vehicle such as a bus. The BHIS, Andheri transport

department ensures that the drivers have no significant previous record of any traffic offences, challans or other offences. All school bus drivers are trained to strictly follow traffic rules and safe driving habits, such as, they must never use mobiles while driving etc.

9.4.4 The BHIS, Andheri transport department conducts due diligence before recruiting school bus drivers and conductors. BHIS endeavours to ensure that the bus drivers and conductors so recruited are of clean antecedents and well – behaved. Constant training is given to bus drivers and conductors, to ensure that the BHIS’ students are safely brought to the school and taken back home. They are constantly monitored by the school authorities.

9.4.5 Children reaching school by bus have a safe passage from the bus to the school premises. The bus only stops within the boundary wall of the premises and school guards and Admin staff are present to ensure safe passage of children from bus drop point to respective school gates. Every single

passage of children from bus drop point to respective bus is emptied and no student remains in the buses, before the buses move to park or leave the premises as may be the case.

9.4.6 At dispersal time, all students are accompanied to the school buses in a group by a designated representative.

9.4.7 Every bus has either/both, \*\*one male and one female helper/Didi present on the route along with the driver. Therefore, presence of an adult female is ensured before the first student boards the bus at the start of the journey and till the last student gets off at the end of the journey.

(\*\* a male attendant is present if and only if the bus is a 40 seater)

9.4.8 Attendance of all students on the route is ensured by the teacher in charge of the bus at the start of the journey/ at the departure time.

9.4.9 Routing is done in such a manner that the first and last female child is accompanied by a female Didi. Routing of the buses are planned in such a manner, so that the student is dropped as close as possible to their residence.

9.4.10 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 with the authorized Exit slip duly signed by the respective School Principal and counter- signed by the Administrator after the consent of the respective Parents.

9.4.11 In case a student who usually travels by bus is being picked up by the parent for some reason, this is facilitated only after due procedure of request for special departure from parent to the school is made, and a specific Exit slip is signed by the respective Principal and the Administrator.

9.4.12 The bus driver ensures that the doors of the bus are closed before he begins moving, students are seated, their seat belts are fastened, and no student is exposed directly in front of the doors even when closed. Conductor/helper also ensures that there is no hindrance in passageways and all emergency exits are clear.

9.4.13 Every school bus has 2 CCTVs and GPS and monitoring of the same is done by the BHIS, Andheri Transport Department.

9.4.14 The School Transport In-charge ensures that the bus is driven only by the authorized driver always on the route by viewing of bus CCTV footage on a regular basis.

9.4.15 All buses are painted in yellow and have the words 'School Bus', name of school and route number are displayed prominently.

9.4.16 All buses do not have curtains or dark films. They have internal white lighting and activities in the bus are visible from outside.

9.4.17 All buses have a valid certificate of fitness, pollution and insurance certificate.

9.4.18 All buses have a first-aid box.

9.4.19 All buses have fire extinguishers.

9.4.20 All buses have working speed-governors and are driven within prescribed limits.

9.4.21 All buses carry only specified number of children permissible as per capacity and permit.

9.4.22 The school buses have painted on it valid telephone numbers and e-mail ids of the bus-in-charge as well as the school authorities/Admin head for feedback in case of improper driving.

9.4.23 The School Transport in-charge regularly organises refresher training session for the transport staff.

9.4.24 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.

9.4.25 The person who made the complaint are informed of the action taken based on the complaint within 7 days.

9.4.26 These complaints are reviewed by the Administrator of the school.

## **9.5 CCTV cameras:-**

9.5.1 The BHIS, Andheri premises are secured and safeguarded by barbed fencing and the access gates are manned and monitored round the clock. All entry gates, which provide access to visitors are equipped with Door Frame Metal Detector and Hand Held Metal Detector.

9.5.2 CCTV cameras have been installed at numerous places in the BHIS campus, with a monitoring control room that has an incident/ suspicious movement recording log book. BHIS has installed the infrastructure for live CCTV streaming in the monitoring control room. There are ample number of CCTV cameras strategically installed at different points in the BHIS, Andheri campus so as to minimise any probable chances whereby safety and security of BHIS' students, staff and visitors, may be compromised.

9.5.3 In addition to the numerous CCTV cameras installed across the BHIS, Andheri premises/ campus, CCTV cameras have also been placed at all the entry points covering the immediate vicinity.

9.5.4 To enhance vigilance and make it more full proofed, BHIS regularly screens the CCTV Footage on sample basis.

9.5.5 Respective School Principals have access to the CCTV monitoring for their respective areas. School Director has

complete access of the CCTV monitoring.

9.5.6 Any fault/defect in the CCTV cameras is reported and rectified at the same time with the help of IT department.

## **9.6 Washrooms:-**

9.6.1 BHIS recognises that washrooms are places where students are vulnerable to being victimized by bullying, stalking, physical violence, sexual abuse etc. and hence BHIS endeavours to create a foolproof security mechanism in and around washrooms on the BHIS premises which are meant for students. BHIS endeavours to ensure total safety for its children (especially Primary school children) in and around the washrooms on the campus.

9.6.2 Separate washrooms have been provided for the support staff and that they are not permitted to use the washrooms intended for BHIS' students. Academic staff uses the same washrooms as students which ensures natural surveillance.

9.6.3 CCTV cameras have been installed in such a manner that the security personnel deputed for monitoring purpose can monitor the entry and exit of all the washrooms and deter vandalism.

9.6.4 Any suspicious movement or disturbance is immediately reported by the staff deployed on ground or by the security personnel deployed for live monitoring.

9.6.5 The cubicle washroom room doors are not covered till the roof and there aren't locked doors in the washrooms of children below 5 years of age.

9.6.6 The Support Service staff looking after the washrooms on the campus, have been instructed to always keep the washrooms lights switched on.

9.6.7 Washroom for school bus drivers and conductors have been isolated. Rest of the support staff also uses dedicated washrooms which are different from the students' restrooms.

## 9.7 Code of Ethics:-

BHIS, Andheri is committed to abide by, uphold and promote Child Protection standards at all times. The safety and well-being of all students is one of the governing principles at BHIS, Andheri. We nurture conducive environment to foster balanced relationships amongst staff and students by encouraging and expecting appropriate behaviour.

We believe that awareness, vigilance and prevention is tantamount to keeping students safe from abuse. This is achieved through constant reinforcement of clearly laid out expectations to the BHIS community.

BHIS Andheri expects all teaching and non-teaching staff/Visitors /Parents/consultants/visiting faculty/members/interns/third party service providers who directly interact with students of BHIS, Andheri on campus or on school trips to:

- treat all students with respect and dignity
- establish, respect, and maintain appropriate boundaries with all students and their families.
- monitor their behaviour towards students, and pay close attention to peers to ensure appropriate and respectful behaviour.
- consider the child's reaction to any activities, conversations, behaviour or other interactions. If at any time one is in doubt about the appropriateness of one's own behaviour or the behaviour of others, it should be discussed with the designated child protection coordinator in BHIS, Andheri Gurgaon.
- Some examples of unacceptable behaviour toward a child:
  - Negative criticism
  - Embarrassing
  - Shaming
  - Blaming
  - Humiliating
  - Physical or verbal/nonverbal abuse
  - Child sexual abuse

**BHIS, Andheri will ensure:**

- Safe recruitment through systematic reference check of the new staff appointed at the time of recruitment (administration, teaching/non-teaching or volunteer) to work in school with students. (refer to staff recruitment policy)
- Training the staff members to recognize indicators of any type of abuse.
- Training the staff to handle a child who has disclosed an incidence of abuse towards self or any other child of school.
- Equipping the students of BHIS, Andheri with skills to protect and safeguard themselves against abuse.
- To develop procedures for identifying and reporting for the suspected abuse or abuser.
- Creating awareness among parents and employees of BHIS, Andheri to understand The Child Protection Policy and sign a Child Protection Pledge prior to joining the institution.

**Employees must not:**

- Engage in any sort of physical contact with a child that may make the child or an observer feel uncomfortable, or that may be seen by an observer to be violating boundaries. (As per POCSO act and Gurgaon police guidelines)
- 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. (As per POCSO act and Gurgaon police guidelines)
- Engage in any behaviour that goes against (or appears to go against) the organization's mandate, policies, or Code of Ethics to Protect students, regardless of whether or not they are on duty.
- 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/Child protection coordinator.

- Inappropriate behaviour will not be tolerated, especially as it relates to the well-being of the students involved in activities or programs delivered by the organization.
- Whether or not a particular behaviour or action constitutes inappropriate behaviour will be a matter determined by the organization having regard to all of the circumstances, including past behaviour, and allegations or suspicions related to such behaviour.
- Every complaint regarding inappropriate behaviour or communication with a child, shall be taken cognizance of by the management of BHIS. However, whether or not a particular behaviour or action constitutes inappropriate conduct, or is in contravention of the aforesaid Code of Ethics or this CPP, will be a matter determined by the management of BHIS, having regard to the relevant facts and circumstances. The findings and decision of the management of BHIS shall be final.

## **9.8 Prevention of Ragging / Bullying**

So as to prevent ragging in BHIS, Andheri campus/ premises or school buses or extended environment, the Principal and the teaching staff interacts with students especially freshers for apprising them of their rights as well as an obligation to fight against ragging apart from complaining about the same and to generate confidence in their mind that any instance of ragging to which they are subjected or which comes in their knowledge should forthwith be brought to the knowledge of the

Principal and/ or staff of BHIS and that such complaints shall be promptly dealt with while protecting the complainants from any harassment by the perpetrators of ragging. The Principal and other senior members of BHIS staff conduct meetings of teachers, parent(s) and students collectively or in groups, on bi- annual basis, to spread awareness amongst the students, teachers and parent(s) that ragging is a reprehensible act which does no good to anyone and by simultaneously generating an atmosphere of discipline by sending a clear message that no act of ragging shall be tolerated and any act of ragging shall not go unnoticed and unpunished.

#### **9.9 Child Protection Pledge:-**

As per the Gurgaon Police's "Guidelines For Safety Of Children In Schools" (Mandate 5.2.3)<sup>9</sup>, BHIS has drafted and incorporated in its system the following Code of Conduct known as 'The Child Protection Pledge'. This Pledge is required to be signed by all new entrants upon joining. This document is signed annually as a reminder to all the school staff of their responsibilities towards the students of BHIS.

<sup>9</sup> 5.2.3. Code of conduct: 5.2.3.1. Every teacher must sign a code of conduct which the school will draft based on the above context and in keeping with its own values and framework. Specifically, this code of conduct is intended to endorse the teachers' acceptance of responsibility as custodian of children in their care, specifically during the time the children are assigned to them, as they are the first line of contact with children in the classroom; they must be specifically made aware of do's and don'ts in handling the children and agree to abide by these. 5.2.3.2. The code of conduct document will be re-signed once a year on 1st of January to remind all school staff of their responsibilities. 5.2.3.3. All new entrants must sign the code of conduct upon joining, and thereafter a fresh copy on the annual date along with all school staff.

**The Code of Conduct is as following:**

□As an employee of BHIS, Andheri, I understand my role and responsibility of an educator at all times. I know about the POCSO ACT 2012 and will take the initiative to understand all the laws

pertaining to child rights. I have read thoroughly about the CPP of  
KKIS AND BHIS,ANDHERI

As an employee of KKIS AND BHIS, Andheri I accept to:

- ❖ Give prime importance to the welfare of the child.
- ❖ Be vigilant and observant to signs and symptoms of abuse.(mentioned in the appendix of CPP)
- ❖ Work cooperatively in actions required to safeguard the children.
- ❖ Work cooperatively with parent(s) to ensure the child's safety.
- ❖ Support and share any information that can help the school and the child.
- ❖ Be rational and non-Judgmental with each child.
- ❖ Understand the confidentiality associated with all the concerned issues of a child.
- ❖ Work towards achieving the well-being of the child.
- ❖ Ask for help if I cannot handle a situation with a child at any given time.

- ❖ View safety of all children of KKIS and BHIS, Andheri as my duty and my responsibility in campus or school trips.
- ❖ All members of school community must be treated with respect.
- ❖ Be alert and to report any behaviour that indicates a child being at risk or harm.
- ❖ Never allow any kind of inappropriate behaviour by children or any other employee.

I fully understand that if any action is not according to “Child Protection Pledge” or inability to take any action that has been documented in BHIS Andheri Child Protection Policy may therefore result in disciplinary action.

Name:

Signature:

Date:”

## **CHAPTER – 10**

### **EMOTIONAL GROWTH AND AUGMENTATION**

Apart from protection (safety measures), 'Zero tolerance' against Mental Harassment, Physical Violence or Sexual Abuse of any student of BHIS, and co-operation with the law enforcement agencies, BHIS also seeks to ensure emotional growth of every student by motivation, appreciation, encouragement and counselling.

10.1 BHIS regularly conduct talks by eminent psychologists and counsellors, to speak to and interact with students of BHIS with a view to enhance their Emotional Quotient (EQ) and will - power to face life bravely. These talks help the students to build courage to complain against any wrongdoing and injustice, to lead a happy and fulfilling life, to avoid use of drugs and psychotropic substances, to avoid addiction to smartphones and the virtual world, to encourage them in having healthy interaction with peers and the opposite sex, to respect women, to be patient but not tolerant to injustice, to be aware of the use and abuse of the internet and technology etc.

10.2 BHIS, Andheri has a Counselling Department, to ensure the well – being of every student. The department is headed by a professionally qualified counsellor who is always there to uplift the spirit in every child to excel and be happy apart from being a good citizen.

10.3 The school has a Life skills program which helps to build a strong moral value system in the school.

## **CHAPTER – 11**

### **CONTINUOUS ASSESSMENT OF CPP**

- 11.1 This CPP shall be comprehensively assessed annually so as to improvise the same in line with contemporaneous society.
- 11.2 Students and parent(s) are free to give suggestions to improvise the CPP.
- 11.3 Every parent of BHIS' student shall be duty bound to fill up a form titled "Continuous Assessment of CPP" on bi-annual basis.
- 11.4 Every student of BHIS has an option to give confidential and anonymous feedback in the form of inputs/suggestions/concerns regarding the implementation of this CPP, as well as to point out if any activity(s) constituting acts and offences covered in Chapter-5 and Chapter-6 have been observed by such student. Such feedback can be addressed to Child Protection Committee and put in a 'Suggestion Box'. It is clarified that such observations regarding activities shall not be taken as a complaint and acted upon in terms of Chapter-5 and Chapter-6 of this CPP. However, the school authorities

shall take appropriate steps to stop any such activities that are found to have been committed.

- 11.5 An audit called “Child Security Audit” shall be conducted annually at the BHIS, Andheri by a committee constituted by BHIS Management. The audit shall be a critical analysis and evaluation of the safety and security of children at large studying in BHIS, Andheri. An audit report shall be prepared and published annually. Any parent shall have a right to obtain a copy thereof.

## **CHAPTER – 12**

### **MONITORING THE CPP**

12.1 This CPP shall be monitored by a committee or committees constituting of members, as may be formed from time to time by the Management of BHIS.

12.2 The various 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 or Senior Staff Members who may be appointed for this purpose by the Management of BHIS.

12.3 BHIS presently have allocated responsibilities of protection of BHIS students, to members of the Child Protection Committee, Child Protection Officers and an overall Head. BHIS presently are following in letter and spirit the numerous guidelines issued by law enforcement agencies and other bodies.

## **CHAPTER – 13**

### **AMENDMENT OF CPP**

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

13.2 Before amending or revising this CPP, BHIS Management may involve stakeholders such as the principal, senior teaching staff, counselor, and experts in the field of child protection.