

CHILD PROTECTION & POCSO POLICY

(In accordance with the Protection of Children from Sexual Offences (POCSO) Act, 2012, Juvenile Justice (Care and Protection of Children) Act, 2015, CBSE Guidelines, NCPCR Guidelines and other applicable laws)

Date Finalized: 01-07-2026	Version: 2.0	Review Date: 30.6.26
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1. INTRODUCTION

Khaitan Public School is committed to providing a **safe, secure, respectful and child-friendly learning environment** where every student is protected from abuse, neglect, exploitation, bullying, discrimination, violence and all forms of inappropriate behaviour.

The school believes that every child has the right to learn in an environment that promotes dignity, respect, equality and emotional well-being. Every member of the school community shares the responsibility of safeguarding children and creating a culture where children feel safe, valued and confident to report any concern.

The school adopts a **zero-tolerance approach** towards all forms of child abuse, whether physical, emotional, verbal, sexual or online. Every concern relating to child safety shall be treated seriously and handled promptly, sensitively and confidentially, keeping the **best interests of the child** as the highest priority.

This Policy provides a clear framework for:

- preventing child abuse and unsafe behaviour;
- promoting awareness among students, employees and parents;
- identifying and reporting child protection concerns;
- responding to complaints in a timely and child-sensitive manner;
- ensuring compliance with statutory reporting obligations; and
- maintaining accountability in all child protection matters.

The Policy applies to every person associated with the school and will follow all applicable laws, Government notifications and CBSE safety guidelines.

2. OBJECTIVES

The objectives of this Policy are to:

- Provide a safe, inclusive and child-friendly environment for every student.
- Protect children from all forms of physical, emotional, verbal, psychological, sexual and online abuse.
- Promote a culture of respect, dignity, equality and responsible behaviour throughout the school.
- Create awareness among students, employees and parents about child protection and personal safety.
- Establish simple, accessible and confidential mechanisms for reporting child protection concerns.
- Ensure compliance with the Protection of Children from Sexual Offences (POCSO) Act, 2012 and other applicable child protection laws.
- Encourage early identification of behavioural changes or warning signs that may indicate abuse, neglect or emotional distress.
- Provide appropriate support and guidance to children affected by safeguarding concerns.
- Ensure that all employees understand their legal duty to report suspected child abuse.

3. SCOPE

This Policy applies to every person associated with Khaitan Public School, including:

- Students
- Teaching staff
- Non-teaching staff
- Administrative staff
- Contractual employees
- Consultants
- Coaches and instructors
- School counsellors
- Interns
- Transport staff

- Security personnel
- Housekeeping staff
- Vendors and service providers working within the school
- Visitors and guests
- External agencies conducting programmes or activities for the school

The Policy applies to all School-related activities conducted:

- within the school campus;
- during school transport;
- during educational visits, excursions and field trips;
- during sports events, competitions and cultural programmes;
- during residential camps and exchange programmes;
- during online classes and virtual learning sessions;
- through school-managed communication channels;
- during any activity organised, sponsored or authorised by the school, irrespective of location.

The provisions of this Policy apply irrespective of the time, place or mode of interaction whenever the safety, dignity or well-being of a student may be affected.

4. LEGAL FRAMEWORK

This Policy has been framed in accordance with the provisions of the following laws, rules and guidelines, as amended from time to time:

- Protection of Children from Sexual Offences (POCSO) Act, 2012
- Protection of Children from Sexual Offences Rules, 2020
- CBSE Affiliation Bye-Laws
- CBSE Circulars and Guidelines relating to Child Safety, School Safety and Prevention of Bullying
- National Commission for Protection of Child Rights (NCPCR) Guidelines
- Ministry of Education School Safety Guidelines
- Any other law, notification or Government direction applicable to child protection and safeguarding.

Where any provision of this Policy is inconsistent with a statutory requirement, the provisions of the applicable law shall prevail.

5. DEFINITIONS

For the purpose of this Policy, the following terms shall have the meanings assigned to them:

5.1 Child

A **child** means any person below the age of **18 years**, as defined under the Protection of Children from Sexual Offences (POCSO) Act, 2012.

5.2 Child Protection

Child Protection refers to all measures taken to safeguard children from abuse, neglect, exploitation, violence, discrimination or any situation that may harm their physical, emotional, psychological or social well-being.

5.3 Child Abuse

Child abuse includes any act or omission that causes, or is likely to cause, harm to a child.

It includes:

- Physical abuse
- Emotional abuse
- Verbal abuse
- Sexual abuse
- Exploitation
- Bullying
- Cyberbullying

5.4 Sexual Abuse

Sexual abuse includes any act of a sexual nature involving a child, whether through physical contact or otherwise, as defined under the POCSO Act.

Examples include:

- inappropriate touching;
- forcing or encouraging a child to engage in sexual activity;
- making sexually coloured remarks;
- showing pornography;
- exposing private body parts;
- sending sexually explicit messages;

- online grooming;
- recording or sharing intimate images without consent;
- any other conduct prohibited under the POCSO Act.

5.5 Online Sexual Abuse

Online sexual abuse includes any inappropriate behaviour towards a child through digital platforms, including:

- online grooming;
- sharing or requesting explicit photographs or videos;
- sending obscene messages;
- inappropriate video calls;
- cyberstalking;
- impersonation;
- blackmail using digital content;
- misuse of social media or gaming platforms.

5.6 Bullying

Bullying means repeated behaviour intended to hurt, threaten, embarrass or isolate another student.

It may be:

- physical;
- verbal;
- emotional;
- social; or
- cyber.

5.7 Child Protection Concern

A Child Protection Concern means any information, behaviour, disclosure or observation that suggests a child may be:

- unsafe;
- abused;
- exploited;
- bullied;

- emotionally distressed;
- at risk of harm; or
- requiring immediate safeguarding intervention.

5.8 Employee

Employee means any person engaged by the school on a permanent, temporary, contractual, part-time, probationary or voluntary basis, including consultants, interns and outsourced personnel.

5.9 Parent

Parent includes the biological parent, adoptive parent, legal guardian or any person legally responsible for the care of a child.

5.10 School Complaint Committee

The School Complaint Committee is the committee constituted by the school in accordance with CBSE guidelines to receive, review and facilitate the redressal of student complaints relating to safety, well-being and child protection.

5.11 Mandatory Reporting

Mandatory Reporting means the legal obligation under Section 19 of the POCSO Act requiring every person who has knowledge or reasonable suspicion of an offence under the Act to report it immediately to the appropriate authorities.

Failure to report such offences may attract penalties under Section 21 of the Act.

6. GUIDING PRINCIPLES

The implementation of this Policy shall be guided by the following principles:

- **The best interests of the child shall always be the primary consideration.**
- Every child shall be treated with dignity, compassion and respect.
- Every concern or complaint shall be taken seriously, irrespective of the identity of the persons involved.
- Every child shall have the right to be heard in a safe, supportive and non-threatening environment.
- Confidentiality shall be maintained throughout the reporting and response process, except where disclosure is required by law.

- No child, employee, parent or witness shall face retaliation for reporting a genuine concern in good faith.
- The school shall promote prevention through regular awareness programmes, training and child safeguarding initiatives.
- Every employee shall act responsibly and fulfil their legal duty to report suspected child abuse.
- All actions taken under this Policy shall be fair, timely, child-sensitive and consistent with applicable laws and CBSE guidelines.

7. SCHOOL COMPLAINT COMMITTEE (SCC)

In accordance with CBSE Child Protection Guidelines, the School shall constitute a **School Complaint Committee** to provide a safe, child-friendly and accessible mechanism for students to report concerns relating to their safety and well-being.

The Committee shall function as the first point of contact for receiving complaints and shall ensure that every concern is handled promptly, sensitively and in accordance with applicable laws.

Composition

The School Complaint Committee shall comprise:

- Chairperson- Mr. Anand Kumar (Principal) *Anand Kumar*
- Ms. Karishma Sharma (Behavioural Counsellor) *Karishma Sharma*
- Mr. Gaurav Gupta (PGT) *Gaurav*
- Harshia Chopra (Head girl) *Harshia*
- Ahan Koul (Dy Head of Prefectorial Board) *Ahan*
- Mr. Vir Singh (Admin Manager) *Vir Singh*

*Student representatives shall be selected from senior classes and shall receive orientation regarding confidentiality, ethical conduct and their role in promoting a safe school environment.

The composition of the Committee shall be reviewed annually.

Functions of the School Complaint Committee

The Committee shall:

- Receive complaints relating to child safety, bullying, cyberbullying, abuse, neglect, harassment, discrimination or any behaviour affecting the safety and well-being of students.
- Ensure every complaint is treated seriously, respectfully and without bias.
- Provide a safe and child-friendly environment for children to report concerns.
- Ensure immediate protective measures wherever necessary.

- Coordinate with the Principal, Child Protection Committee and statutory authorities in matters involving child protection.
- Maintain confidential records of complaints, actions taken and case closure.
- Recommend counselling, academic support or other appropriate interventions.
- Monitor implementation of corrective actions.
- Submit periodic reports to the Child Protection Committee.

The Committee shall not attempt to investigate criminal offences under the POCSO Act independently. Cases involving offences under the Act shall be immediately reported to the appropriate authorities as required by law.

8. ROLES AND RESPONSIBILITIES

8.1 Responsibilities of the School Management

The School Management shall:

- Provide adequate resources for implementation of this Policy.
- Ensure compliance with all statutory child protection requirements.
- Appoint members to the Child Protection Committee and School Complaint Committee.
- Ensure annual review of the Policy.
- Approve corrective actions arising from child protection reviews.
- Support awareness programmes and employee training.

8.2 Responsibilities of the Principal

The principal shall:

- Ensure effective implementation of this Policy.
- Promote a safe and inclusive school environment.
- Ensure mandatory reporting obligations are fulfilled without delay.
- Ensure complaints are handled promptly and confidentially.
- Maintain liaison with statutory authorities.
- Review implementation of recommendations made by the Child Protection Committee.
- Ensure all records are maintained securely.

8.3 Responsibilities of Employees

Every employee shall:

- Treat every child with dignity and respect.
- Maintain professional boundaries at all times.
- Report any suspected abuse, neglect or exploitation immediately.
- Participate in mandatory child protection training.
- Cooperate with investigations conducted by statutory authorities.
- Maintain confidentiality regarding all child protection matters.
- Avoid behaviour that may compromise the safety or dignity of a child.

Failure to report a suspected offence under the POCSO Act may attract legal consequences under Section 21 of the Act.

8.4 Responsibilities of Students

Students are encouraged to:

- Treat one another with respect.
- Report any unsafe behaviour experienced or witnessed.
- Respect personal boundaries and privacy.
- Follow the school's Code of Conduct.
- Support peers in seeking help from trusted adults when needed.

8.5 Responsibilities of Parents

Parents shall:

- Support the school's child protection initiatives.
- Inform the school of any concerns affecting their child's safety or well-being.
- Encourage children to speak openly about safety concerns.
- Cooperate with the school during child protection interventions.
- Participate in awareness programmes organised by the school.

9. REPORTING CHANNELS

The school shall provide multiple safe and accessible channels for reporting concerns.

A concern may be reported to:

- Class Teacher
- School Counsellor
- Principal

- Vice Principal
- Any member of the School Complaint Committee
- Any member of the Child Protection Committee
- Designated Safe Teacher
- Through the School Complaint/Suggestion Box
- Through the designated school email address
- Through the online grievance portal
- Through a parent or guardian
- Directly to Child Helpline (1098), Police or the Special Juvenile Police Unit, where appropriate.

Anonymous complaints may also be received. Such complaints shall be assessed based on the information available and appropriate action shall be taken wherever necessary.

10. REPORTING OF CHILD PROTECTION CONCERNS

Every employee has a legal and moral responsibility to protect children from abuse, neglect, exploitation and unsafe situations.

Any employee, student, or parent, who becomes aware of a child protection concern shall report it immediately through one of the prescribed reporting channels.

No employee shall ignore, suppress or attempt to resolve a child protection concern informally if it appears to involve abuse or a possible offence under the POCSO Act.

The identity of the person reporting the concern shall be kept confidential to the extent permitted by law.

11. MANDATORY REPORTING UNDER THE POCSO ACT

In accordance with **Section 19 of the Protection of Children from Sexual Offences (POCSO) Act, 2012**, every person, including every school employee, who has knowledge or reasonable suspicion that a child has been sexually abused is advised to immediately report the matter to the:

- Special Juvenile Police Unit (SJPU), or
- Local Police.

The School Complaint Committee or Child Protection Committee shall **not delay or prevent such reporting** while conducting any internal assessment.

Failure to report a POCSO offence may attract penalties under **Section 21 of the POCSO Act**.

The school shall fully cooperate with all investigations conducted by the Police, Child Welfare Committee (CWC), District Child Protection Unit (DCPU) and other statutory authorities.

Immediate Action

Upon receiving any disclosure or observing any signs of abuse, the employee shall:

- Ensure the immediate safety of the child.
- Listen calmly without asking leading questions.
- Avoid making promises of secrecy.
- Inform the Principal and Child Protection Officer immediately.
- Complete the prescribed Incident Reporting Form.
- Preserve all available evidence.

No employee shall attempt to investigate the matter independently.

12. COMPLAINT REGISTRATION

Every complaint received shall be documented promptly and accurately.

Complaints may be submitted:

- in writing,
- through email,
- through the online grievance portal,
- through the complaint box,
- through a parent or guardian,
- or by any person acting in the best interest of the child.

13. ACKNOWLEDGEMENT OF COMPLAINT

Every complaint received by the School Complaint Committee shall be acknowledged within **two working days**.

The acknowledgement shall include:

- date of receipt,
- name of the receiving authority,

Where immediate intervention is required, the school shall initiate protective measures without waiting for formal acknowledgement.

14. INITIAL RISK ASSESSMENT

Immediately upon receiving a complaint, the School Complaint Committee shall conduct a preliminary assessment to determine:

- whether the child is presently at risk;

- whether immediate medical attention is required;
- whether counselling support is required;
- whether parents or guardians should be informed;
- whether mandatory reporting under the POCSO Act is applicable;
- whether interim safety measures should be implemented.

The safety and well-being of the child shall remain the highest priority throughout the process.

15. INTERIM PROTECTIVE MEASURES

Pending further action, the school may implement one or more of the following measures:

- ensure the child is removed from any unsafe situation;
- arrange immediate counselling or psychological support;
- modify seating arrangements or class allocation where necessary;
- restrict contact between the child and the alleged offender;
- increase supervision during school activities;
- provide academic support where required;
- facilitate medical assistance if necessary;

Such measures are preventive in nature and shall not be interpreted as a finding of guilt.

16. DOCUMENTATION OF COMPLAINTS

Every complaint shall be supported by complete and accurate documentation.

The school shall maintain:

- Complaint Registration Form;
- Initial Risk Assessment;
- Action Taken Report;
- Communication Record;
- Counselling Record (where applicable);
- Police Reporting Record (if applicable);
- Closure Report.

Informal communication such as WhatsApp messages, verbal confirmations or telephone conversations shall **not** be treated as official evidence of complaint closure.

All complaints shall be supported by properly signed records.

17.1 INQUIRY PROCESS

Where the complaint does **not** disclose an offence requiring immediate police investigation under the POCSO Act, the School Complaint Committee may conduct a preliminary fact-finding exercise to understand the concern and recommend appropriate action.

The purpose of this process is to assess the child's immediate safety and determine the appropriate course of action. It shall **not** replace or interfere with any investigation carried out by the Police or other competent authorities.

During the process:

- the child shall be treated with dignity and sensitivity;
- questioning shall be age-appropriate and non-intimidating;
- confidentiality shall be maintained;
- only authorised persons shall participate in the process.

Where the complaint indicates a possible offence under the POCSO Act, the matter shall be reported to the Police without delay, and the school shall extend full cooperation to the investigating authorities.

17.2 STEPS TO BE FOLLOWED FOR INQUIRY PROCESS

The internal inquiry is intended only for safeguarding and administrative purposes and shall not replace the statutory investigation conducted by Police.

The process shall include:

Step 1

Receipt of complaint and acknowledgement.

Step 2

Immediate safety assessment.

Step 3

Mandatory reporting to Police/SJPU wherever required.

Step 4

Collection of basic facts for administrative action.

Step 5

Preparation of Preliminary Incident Report.

Step 6

Recommendation of immediate protective measures.

Step 7

Cooperation with Police, Child Welfare Committee and other statutory authorities.

Step 8

Preparation of Action Taken Report.

Step 9

Preparation of Final Closure Report after completion of statutory proceedings.

Closure Report

Each case shall have a formal Closure Report containing:

- Complaint reference number.
- Date received.
- Nature of allegation.
- Action taken.
- Agencies informed (wherever required)
- Interim support provided.
- Outcome.
- Recommendations.
- Date of closure.

Informal evidence such as WhatsApp screenshots shall never be treated as a substitute for an official Closure Report.

All Closure Reports shall be approved by the principal.

18. SUPPORT SERVICES

The school recognises that children involved in safeguarding concerns may require emotional, educational and psychological support.

Depending upon the circumstances, the school may facilitate:

- counselling by the School Counsellor;
- referral to qualified mental health professionals;
- academic support;
- parental guidance;
- medical assistance;
- referral to Child Welfare Committee;
- coordination with District Child Protection Unit;
- rehabilitation support as recommended by competent authorities.

Support shall continue, wherever necessary, even after the formal closure of the case.

19. CONFIDENTIALITY

The school shall maintain strict confidentiality in all child protection matters.

The identity of:

- the child,
- the complainant,
- witnesses,
- employees involved,
- records of proceedings,
- counselling records,
- police communications,
- and all related documents

shall be kept confidential except where disclosure is required under law.

Unauthorised disclosure of confidential information shall invite disciplinary action.

No employee shall:

- Discuss the matter with colleagues.
- Share photographs, CCTV footage or documents.
- Communicate details through WhatsApp groups or social media.
- Speak to media representatives.

Only authorised officials may communicate with external agencies.

20. COMMITTEE MEETINGS

The Child Protection Committee shall meet:

- Quarterly
- Immediately after any serious incident.
- Whenever directed by the Principal.

Every meeting shall include:

- Agenda.
- Attendance.
- Minutes of Meeting.

Confidential matters shall be recorded appropriately without disclosing unnecessary personal details.

21.1 TRAINING, AWARENESS AND PREVENTION

The school believes that child protection is a shared responsibility between the school, its employees and parents. Therefore, awareness and education shall form an essential part of the School's Child Protection Programme.

The school shall:

- Conduct **mandatory annual POCSO and Child Protection training** for all employees, including permanent, contractual and support staff.
- Conduct induction training for every new employee before they begin interacting with students.
- Organise regular age-appropriate awareness sessions for students on:
 - Safe and unsafe touch
 - Personal boundaries
 - Online safety
 - Cyber grooming
 - Reporting unsafe behaviour
 - Respectful relationships
- Conduct awareness programmes for parents to help them recognise signs of abuse and understand reporting procedures.
- Display child protection messages through assemblies, classroom activities, posters and digital platforms throughout the academic year.

21.2 Training Documentation

To ensure compliance with CBSE and statutory requirements, every awareness programme shall have documented records including:

- Training agenda
- Training material/PPT
- Resource person's details
- Attendance sheet signed by participants
- Photographs (where appropriate)

Video recordings alone shall not be treated as sufficient evidence of training.

22. CHILD SAFETY AWARENESS

The school shall ensure that child protection information remains visible and accessible at all times.

The following shall be prominently displayed:

- Child Helpline Number **1098**
- Contact details of the Child Protection Officer
- Contact details of Designated Safe Teachers

23. MONITORING OF COMPLAINT BOXES

Complaint and suggestion boxes shall be installed at easily accessible locations within the school.

The school shall ensure:

- Boxes are checked fortnightly.
- Entries are recorded in the Complaint Register.
- Urgent complaints receive immediate attention.
- Anonymous complaints are reviewed wherever sufficient information is available.
- Every complaint is assigned a tracking number.

No complaint shall be ignored merely because it is anonymous.

24. MALICIOUS OR FALSE COMPLAINTS

The school recognises that every complaint made in good faith deserves careful consideration.

If, after due inquiry, it is established that a complaint was deliberately false and made with malicious intent, appropriate disciplinary action may be initiated.

However,

- inability to prove an allegation,
- lack of evidence,
- inconsistent statements due to trauma, or
- withdrawal of a complaint

shall **not** automatically be treated as a false complaint.

25. ANNUAL COMPLIANCE REPORT

The Child Protection Officer shall prepare an Annual Child Protection Compliance Report containing:

- Number of child protection concerns reported.

- Number of complaints resolved.
- Employee training sessions conducted.
- Student awareness programmes conducted.
- Safety audits completed.
- Recommendations for improving child protection measures.

The report shall be submitted to the Principal and School Management Committee for review and future planning.