

# GURGAON POLICE



## GUIDELINES FOR SAFETY OF CHILDREN IN SCHOOLS

Gurgaon Police shares these Safety Guidelines for Schools with the objective of making school children safe while at and during travel to and from the school. The guidelines have been prepared collectively by concerned parents, NGOs, members of the civil and police administration, judiciary, media, experts in related fields of child safety and child psychology.

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# 1. Introduction

## 1.1. Background:

Children spend a large part of their day in schools and while travelling to and from their schools. Their safety during this time is exceedingly important. Cases come up from time to time of abuse of children at the school premises, or even accidents that could have been easily prevented with just a simple system in place and a little extra care. For every case reported, there are many others that go unreported.

There is a clear and significant role each school has to play in the **Prevention, Reporting and Handling of Child Abuse, and other safety-related accidents during the time children are entrusted to the care of the school.** The School Board of Directors, Principals and Senior Management teams have primary responsibility for the care and welfare of their students. Teachers are the main care-givers to children outside the family and play a key role in ensuring their safety, while grooming them to cope with threats to their personal safety.

## 1.2. Objectives:

**Through this document, Gurgaon Police is attempting to put in place a series of preventive measures that ensures that every school in Gurgaon is a safe zone,** where children can feel comfortable and relaxed, and are in no danger whatsoever during their time at and while travelling to and from the school or while on school trips. These guidelines mandate schools to create a caring, protective and safe environment for all children, to reduce their vulnerability in all situations and facilitate their safety in all places, including public spaces. The document also provides a ready checklist of simple measures that can enhance safety, if these measures are not already being followed. While this document forms the backdrop against which each school is encouraged to further work on its own Child Safety Policy, there are many aspects of the guidelines that follow which are mandatory for all schools to implement to ensure minimum safety standards are in place.

The specific objectives which these guidelines aim to achieve is the safety of children at schools, specifically safety in each of the following aspects:

- a. from risk of kidnapping by any person, within or outside the school while at or travelling to and from the school on school buses, or while on school trips.
- b. from abuse, be it verbal, physical or sexual by any member of staff, be it teaching/non-teaching/contractual, older students or any other person while on the premises or on the transport route.
- c. from bullying, threats by older children (specific attention is drawn to problem as reported of older children seeking protection money or favours from younger children)

- d. from internet/cyberbullying/abuse on facebook/twitter/youtube etc., by circulation of undesirable/objectionable material by school children or staff involving school children
- e. from misuse of electronic/telephonic media at schools leading to obscene emails/texts /videos/etc. during or after school hours by students or staff involving school children
- f. from traffic accidents at/outside premises while boarding buses, crossing roads in vicinity, etc.
- g. from accidents on premises due to fire/short circuits etc.
- h. from any accidents during travel on school buses or while on school trips
- i. from threats by natural calamities such as earthquakes, flooding, etc. by adequate preparation to mitigate the disastrous impact of such events.

**1.3. Coverage:** This document is applicable to the following institutions:

- 1.3.1. All schools, educational institutions, pre-schools in Gurgaon, whether government, private or public, or for girls or boys.
- 1.3.2. Schools for children with special needs, be they integrated or exclusive schools/organizations, Child Development Centres, Children Clinics, Therapy Centres, Play centres, Crèches, Early Intervention Centres, Assisted Living Homes, NGOs run exclusively for children with special needs in all categories of visual impairment, physical disability, cognitive-learning difficulties, speech impairment, hearing impairment, emotional and behavioural difficulties (special reference to Section 8).
- 1.3.3. Regular schools that may admit students with special needs would additionally be bound by guidelines of Section 8.
- 1.3.4. Any residential childcare / daycare/ crèche / shelter facility run for children whether government, private or public.
- 1.3.5. Schools/ academies / centres set up for skill enhancement in sports / dance / music / tutorials and/or other extra-curricular activities where more than 10 children under the age of 18 are tutored at their premises

**1.4. Applicability:**

- 1.4.1. These guidelines are being shared with every school outlining simple measures to be put into place. **The safety of children at school and during their travel by school transport or while on school trips is the responsibility of the school management** and it therefore falls squarely on the school management to prevent, report and handle any cases of mishap or abuse, and do their best to protect children during force majeure circumstances such as earthquakes, floods, etc. by better preparedness and effective systems in place. It is in the interest of the management of every school to implement these guidelines without delay. It is also highlighted that

failure to implement any of these measures will increase chances of cases of abuse or mishaps, which it is our specific objective to prevent.

- 1.4.2. These guidelines may be revised from time to time, with the continued objective of making schools safer and plugging any loopholes that may continue to exist after implementation, and incorporating feedback received on same.

## 2. SECURING OF PREMISES

2.1. **Entry/exit** of all persons in the school should be logged clearly with their in and out times specified, so that at any point, there is a clear record of both insiders and outsiders present on the premises.

- 2.1.1. A record of all staff reporting for duty must be maintained, be it electronic swiping or by signing a register, recording both in and out times. All contract staff must sign their in and out times as well.
- 2.1.2. Daily attendance of students will be recorded through the class teachers at the beginning of each day.
- 2.1.3. A separate register should be maintained for visitors or parents, including the name of the visitor, address, telephone no., purpose and person being met, in and out time, signature.
- 2.1.4. A visitor pass is to be given, and signed by the person who has been met; it should be handed back at the gate on exit and tallied every two hours to ensure that all visitors have left the premises. A specific check at the end of the day should likewise be made.
- 2.1.5. Every person on the premises should have a valid identity card or a visitor pass.

2.2. **School perimeter should be secured** to control access to the premises:

- 2.2.1. There should be only one entry/exit point to the premises; side gates are to be avoided. In case there is a side gate, this must be manned by a security guard maintaining a record of every entry and exit in a register.
- 2.2.2. Walls around the school must be high enough to prevent any scaling; schools with lower walls must increase height of wall as decided in consultation with School Safety Committee.
- 2.2.3. Access to areas like bus area, gym, swimming pools, sports rooms/fields, canteen, toilets should be confined to persons whose presence in the area is required, and are therefore specifically authorized access to these areas; loitering in such specific areas by unauthorized personnel should be prevented to reduce chances of problems arising (e.g. bus driver seen near children's toilets, or canteen boy seen near sports field).

Accordingly, Admin/Security department must draw up a list of such restricted areas and names of persons permitted entry, and these must be displayed on an internal notice board on the premises.

- 2.2.4. Parents or other visitors may not have free access across premises during school hours, and if their entry is necessitated (for other reasons or as specified in 8.2.6.1 for special needs children), they must be accompanied so that their access is limited and monitored. Likewise, students too should not have free access to wander around premises during school timings, and should be made to understand which areas are out of bounds and at what times it is permitted for them to be in specific areas
- 2.2.5. Specifically for bus drivers and conductors, whether employed by the school or contracted out, access area must be limited to just the bus area, and specific instructions must be given to them on which areas are out of bounds for them. It is therefore suggested that a toilet is provided in this area or other such clearly specified area with visible though secluded access, to prevent need for such persons to enter the actual school premises.
- 2.2.6. Special care will be taken to ensure proper sealing and monitoring of areas which are unoccupied or used less often. Ideally, these should be covered by CCTV and the Vigilance officer must take a round of such areas every now and then to ensure safety is not compromised.

**2.3. CCTV:** The school must have adequate CCTV coverage.

- 2.3.1. Cameras must cover all critical areas of the premises. Areas for specific attention are as indicated:
  - 2.3.1.1. entry and exit points of the school (in case there is a side entrance, this too must have a CCTV camera)
  - 2.3.1.2. all corridors and staircases
  - 2.3.1.3. library, infirmary, auditorium
  - 2.3.1.4. inside elevators
  - 2.3.1.5. dining halls, sports rooms, computer labs
  - 2.3.1.6. entrance to classrooms
  - 2.3.1.7. entrance to toilets
  - 2.3.1.8. sports fields, swimming pools
  - 2.3.1.9. areas where buses assemble
  - 2.3.1.10. entry and exit point of premises
  - 2.3.1.11. any point on the outer perimeter/wall which is vulnerable, and which could show footage of persons attempting to gain entry to the premises, especially covering persons outside the main entrance.
- 2.3.2. While CCTV at entrance to toilets is essential, it is not permitted to fit CCTVs inside toilets, to ensure that dignity is not compromised.

### 2.3.3. Getting the best out of CCTV cameras:

- 2.3.3.1. The cameras must have point, tilt and zoom capability and the recording capacity of the footage should be at least 45 days.
- 2.3.3.2. All vehicles entering and leaving the premises should be caught on camera with at least a 50-metre range with a clear image of the vehicle number.
- 2.3.3.3. A control panel must be set up, with screens visible in a public place (such as reception) where in addition to the designated viewer, viewing is possible by any passerby including responsible persons such as teachers, the Security-in-charge, Safety Officer, Vigilance Officer, etc. The knowledge that the screen is in public view is also the best deterrent for offenders from within the system.
- 2.3.3.4. The duty shift of the viewer should not be more than 4 hours at a stretch.
- 2.3.3.5. CCTV equipment must be maintained regularly and it must be ensured that once installed, the footage is viewed and the equipment used to bring in a strong control. Particular attention should be given to look out for any suspicious movement within premises and alongside perimeter, which could indicate bad elements checking out the area ahead of a planned crime. Cameras that are installed but neither maintained nor viewed, nor action taken, can become an investment with zero impact on safety.

2.3.4. School buses must mandatorily have GPS and CCTV cameras.

2.3.5. The issue of cost of equipment has to be settled in consultation with other stakeholders after discussing costs versus merits.

**2.4. Measures to reduce physical hazards that risk safety of children:** Some specific roles have been outlined below, which would put the focus on the right kind of supervision that is preventive in nature. Depending on the size of the school, these roles could be clubbed or it may be warranted that they are kept separate to ensure that the role is duly carried out without any dilution in ensuring the responsibilities are duly carried out.

**2.4.1. Vigilance Officer:** This role is an essential role with the specific purpose of maintaining an overall vigil over safety of children in the school and ensuring that dangers and risks to children are minimized. The Vigilance Officer must particularly monitor that only those staff with access to parts of premises are seen in these areas. Reducing unauthorized access is a key way to safeguard premises. The Vigilance Officer is also required to have a clear view of CCTV feeds, monitor these on an ongoing basis, and review feeds from time to time. Particular attention must be paid to entry/exits to washrooms, whether any unauthorized person is entering classrooms and if any person is attempting to gain unauthorized entry, viewable through coverage of the perimeter/entry. The Vigilance officer should submit routine reports on external/internal security arrangements (such as lighting, accessibility, etc.), and should be especially visible during school assembly and dispersal time.

- 2.4.2. **Health Officer:** The school shall have a designated Health Officer (role could be performed jointly with other roles) who will ensure basic screening of staff for medical ailments/infections at their time of joining by ensuring basic medical check is carried out. Thereafter, the exercise shall be repeated annually for all contractual staff working in the canteen area, and for ayahs/didis/helpers/attendants (by whatever name called) and cleaners who come in daily contact with small children.
- 2.4.3. **Canteen Officer:** The school shall have a designated Canteen officer (role could be performed jointly with other roles) who will ensure basic hygiene and cleanliness of any food or liquid items served, as well as of the premises, counters, utensils, crockery etc. The food shop license must be displayed in the canteen. The Inspection certificate which must be obtained annually from the relevant authority, and be available for checking.
- 2.4.4. **Safety Officer:** The school shall have a designated Safety Officer whose specific responsibility it shall be to ensure that there is minimum risk to child safety on account of physical hazards. It shall be the responsibility of the Safety Officer to ensure the following are given due attention:
- 2.4.4.1. **Electricity-related risks:** improper/exposed wiring and open electricity panels resulting in live wires, improper location of panels in areas children frequently pass through, proper installation of MCBs to prevent short-circuits; strict procedures to ensure that electricity, heating, air-conditioning are monitored and not left on overnight increasing risks of over-heating/fires. Areas with improper lighting must also be immediately addressed as such low-light areas become points where incidents of abuse or bullying are more likely to happen; accordingly a weekly check of non-functioning lights must be ensured with immediate replacement.
- 2.4.4.2. **Storage of hazardous/dangerous materials** such as acids, kerosene oil, spirits, glass or other inflammable or toxic materials in laboratories, kitchens or other godowns should be stored safely in an area away from children, and must be stored under lock at all times.
- 2.4.4.3. **Gas-related risks:** ensuring periodic maintenance of gas burners in canteens/chemistry labs, checking of leakage in pipe and valves, strict procedure to ensure main valves, stoves etc. are shut after use to prevent gas leakage.
- 2.4.4.4. **Water-related risks:** safe drinking water on premises including periodic cleaning of tanks which must be covered, preventing leakage resulting in slippery floor; open sumps, water pits that may pose risk of drowning, swimming pools to ensure adequate safeguards with lifeguard and railings to prevent risk of drowning by unauthorized access of small children.
- 2.4.4.5. **Fire-related risks:** Besides specific checks of vulnerable areas, all fire extinguishing equipment must be regularly maintained, besides adequate standby sand and water supplies. A certificate from the fire department on the school's fire-worthiness must be obtained every 6 months in accordance with the rules and be available for inspection.

- 2.4.4.6. **Other physical obstructions:** low hanging power lines, improper placing of furniture, obstructions in escape routes of all emergency exits, sharp/heavy objects at a height (such as flowerpots on parapet), etc. must be monitored and rectified periodically, including specific checks for cracked or broken glass.
  - 2.4.4.7. **Disabled-friendly access:** to minimize safety risks to those children with special needs who may be in wheelchairs, it must be ensured that they are adequate ramps, railings at appropriate points. It must also be ensured that the toilet can fit in a wheelchair, so that no child with a disability is forced to leave the wheelchair outside the toilet, increasing the risk of injury due to a fall.
  - 2.4.4.8. **Other structural risks:** cracks in building, loose false ceilings must be monitored periodically and rectified urgently in case of problems.
  - 2.4.4.9. **Playground:** Care must be taken that there are no physical hazards for children such as sharp edges, rusty rods, broken/faulty play equipment such as swings/slides, no thorny bushes, particularly at lower heights which adults may not notice but could cause injury to children
  - 2.4.4.10. **Safety of glass installations:** Where there are large glass doors/panels on the school premises, these must be highlighted in some way such as placing stickers or coloured tape to ensure children are alerted that there is a glass sheet, to prevent them running into the glass, thereby risking breakage and resultant injury.
  - 2.4.4.11. **Force majeure calamities** such as earthquake, flood, riots: the Safety Officer shall ensure that there is a basic process and system in place for evacuation and dealing with such calamities, conducting periodic drills with adequate, well-labelled emergency exits so that ill-effects can be mitigated in the event of such a calamity, and connect with community partners such as Fire-department, area hospitals, etc. so that there is a ready rapport at time of emergency.
- 2.4.5. **Transport/Bus-in-charge:** This role is a critical role to ensure smooth operation of transport for safe travel of children through school buses, and the responsibilities are explained in detail under Section 4.3
- 2.4.6. **School Counsellor:** Role to be performed as detailed in Section 6.2
- 2.4.7. **Risk assessment:** It is mandatory for the Vigilance Officer to carry out a regular survey of potential disaster risks under each of the above heads once a month, take immediate actions necessary and record details of inspection in an appropriate register. Where roles of Safety and Vigilance officer are clubbed, there must also be a weekly check of areas listed under Section 2.4.4.
- 2.4.8. **Safety plan:** A safety plan must be prepared by the school and submitted to the local police station before 1<sup>st</sup> January every year, containing the following:
- 2.4.8.1. a specific checklist of safety-related aspects that are being regularly attended to (in keeping with list in Section 2.4.4).



- 2.4.8.2. specific procedures that are being followed by the school to prevent and handle emergencies such as a) fire b) earthquake c) bomb threat d) school bus accident e) hostage/kidnapping f) chemical accident g) children carrying weapons to school h) civil disturbance i) medical emergency.
- 2.4.8.3. Details of when the last drill for evacuation in case of fire, earthquake, etc. was held. This must be held in coordination with the local police station at least once in six months.
- 2.4.8.4. Confirming that easy access of escape routes for any students in wheelchairs, with convenient ramps at essential points has been ensured.

## **2.5. Neighbouring premises:**

- 2.5.1. Unauthorised vendors, carts, shops and other establishments in the immediate area and boundary of schools must be removed.
- 2.5.2. Authorised vendors should possess a license which is endorsed by the local police station.
- 2.5.3. Schools may report any such cases to the local police station to get assistance in this regard.

## **3. SAFEGUARDS RELATING TO STAFF**

### **3.1. Recruitment:**

- 3.1.1. No candidate with a criminal record of sexual and/or physical violence may be recruited for any position within a school/institution.
- 3.1.2. Apart from the verification of antecedents, it is recommended that the interview panel consists of the School Counsellor who is able to provide a psychological profile of the person being considered for employment, to ensure that these are in tune with the values and ethos of the school.
- 3.1.3. Till such time references are being verified, the services of the person may be utilized but only on probation.
- 3.1.4. All selected candidates must provide a signed affidavit to the institution that they have not been accused of offences under POCSO (Protection of Children from Sexual Offences) Act 2012, the JJ (Juvenile Justice, Care & Protection of Children) Act 2000 and any other sexual and/or violent crimes under any other provision of law that has been in force.
- 3.1.5. The affidavit may also contain information pertaining to his/her character and background. In addition, two references (including a character certificate) may be provided by the person seeking employment.
- 3.1.6. At the time of being given the appointment letter, all candidates will be presented with a copy of the school's child protection policy document and

code of conduct, and will be required to sign it in acceptance as further elaborated in Section 5.2.3.

3.2. All school employees should undergo a 360 degree **verification** as specified below:

3.2.1. **Process:** the employee's complete employment record should be checked with specific reference checks against each employment on the resumé. Any past history of social violations should specifically be checked through police verifications and references at all addresses given in his/her resumé.

3.2.2. **Purpose:** The onus is on the schools to vouch for the clean record of the person being employed and hence this verification is an important consideration, and appointment should be withheld if there is any indication that this person did not demonstrate a high moral character. Accordingly, it is specifically required to check with all past employers the reason for the employee's departure, to ensure there is no difference between stated reason and actual reason, which would be an immediate warning flag. Therefore, open-ended questions must be asked such as: *Why did s/he leave?* rather than: *He says he left because the distance was too far, is this correct?* Often an employer may not wish to spoil prospects of an ex-employee, so it is better to ask questions which make it more difficult rather than easier for the truth to be concealed.

3.2.3. **Coverage:** the term 'employee' refers to full-time staff on the rolls of the school, as well as part-time and contractual staff such as contractors and their workers, specifically construction staff, sanitation staff, security guards, cooks, canteen staff, gardeners, etc. It includes the school nurse where permanent or part-time. It includes staff that is provided by Facilities management for housekeeping, electrician, plumbers, etc. It specifically includes bus drivers and conductors, whether the transport staff is outsourced to a third party or is on the rolls of the school; in this respect, it must be ensured that all bus drivers have a valid driving license, 5 years minimum stipulated years of experience of driving a heavy vehicle and no cases pending against them, as per the Supreme Court guidelines in this regard.

3.2.4. **Procedure:** References as specified above must be duly checked and a copy retained in school records.

3.2.5. In case there is no such verification record of current employees who have been with the school less than 6 months, this verification procedure must be completed retrospectively.

3.2.6. This procedure must be strictly followed with all new recruits to the school.

3.2.7. All support staff including the school nurse must be interviewed by a counsellor and recruited only after a due background check and police verification, especially those who have access to toilets, medical rooms, such as cleaners, helpers (didis), nurses, etc. If this procedure has not been followed for existing support staff, it must be completed retrospectively.

3.2.8. It is the responsibility of the school to ensure that all transport staff, even if provided by contractors have been verified. The school must maintain a copy of police verification for such staff, with details of contacts of their hometown, as well as 2 referees from hometown and 2 referees from Gurgaon. Likewise, police verification must be obtained for other outsourced activities like canteen, etc. Format to be used is Police Verification Form from Gurgaon Police website.

**3.3. Contractual staff** such as electricians, plumbers etc.

3.3.1. All construction and repair work on school premises must be done only after school hours.

3.3.2. No entry of plumbers, electricians, carpenters, labourers, etc. is to be permitted on premises during school hours even if a new wing is being constructed, unless it is to attend to an emergency, in which case the person must be accompanied by a school admin person at all times, and entry/exit procedures of signing register and obtaining a visitor pass must be strictly followed.

3.3.3. Contractor must obtain police verification format for all such contractual staff in his employ and deposit a copy with the school Vigilance officer who will maintain these in school records.

**3.4. Identity cards:**

3.4.1. All school staff must be issued with photo identity cards which must be displayed while on the premises.

3.4.2. Identity cards are a must for drivers and other contractual staff who are on the premises daily.

3.4.3. For staff such as electricians who may be summoned on a specific basis, a visitor card must be issued and monitored to ensure due exit of the person after completion of the job.

**3.5. Records of all staff:**

3.5.1. Biodata with personal details of all staff, permanent or contractual must be maintained as part of school records. Besides a photograph and signature (or thumb impressions), it must also contain past employment details, addresses of local residence, hometown, person's mobile and landline numbers, family member contact numbers in Gurgaon, 2 references from hometown and 2 from Gurgaon.

3.5.2. All affidavit and/or references at time of recruitment shall be obtained in writing and maintained as part of the records of the school.

3.5.3. The school should maintain a database of all staff which must be updated when a person is leaving clearly mentioning the reason for leaving, for both male and female members. In case this is linked to misconduct or abuse of any sort, this must specifically be recorded and intimated to the local police station.

**3.6. Violations:** In case of an employee or other person employed at a school being accused of an offence under POCSO, the JJ Act or any other sexual crime or violence, the person so accused shall be removed from active duty with immediate effect pending enquiry as per the due process established by law.

## **4. SAFEGUARDS RELATING TO ENTRY/EXIT OF STUDENTS**

### **4.1. Identity cards:**

- 4.1.1. The school must issue a set of 2 identity cards for every child, one which will be worn by the child, and the other to be retained by the parent; clearly differentiated from the child's card with a colour coding.
- 4.1.2. The identity cards should have a photograph of the child with name, class & section, blood group, names and mobile numbers of parents. If the child uses a bus, bus route number should also be indicated.
- 4.1.3. Identity cards must be worn by all children, irrespective of whether they travel by school bus or some other shared transport or cycle or walk to school, or whether they are being dropped and picked up by the parents/other arrangement.

### **4.2. Student data record:**

- 4.2.1. The school must maintain contact numbers of both parents in its records as well as details of siblings in the school. Additionally, phone numbers of 2 other emergency contacts must be maintained, in case the parents are unable to take the call and it is an emergency.

### **4.3. Ensuring safety for children using school buses:**

- 4.3.1. Children reaching school by bus should have a safe passage from the bus to the school premises. Ideally, the bus should stop within the boundary wall of the premises. If access makes this impossible, then there must be school guards present to ensure safe passage of children from bus drop point to school gate.
- 4.3.2. Once the morning drop-off has been done, the school bus-in-charge must ascertain with the help of guards that every single bus has been emptied and no child has remained in a bus, before the buses move to park or leave the premises as may be the case. This is a situation that can put the child at high risk of abduction or abuse.
- 4.3.3. At dispersal time, children of classes KG to 2 must be accompanied to the school bus in a group by a designated representative, be it a didi or a teacher, especially bearing in mind they are small children in an area where buses are moving or reversing and must not be left unaccompanied.
- 4.3.4. Every bus should have one female teacher and one female helper/didi present on the route. Therefore presence of an adult female is essential before the first student boards the bus at the start of the journey and also till the last student gets off at the end of the journey. Exception may be made only if the first/last student is a male student aged 14 or above.

- 4.3.5. Attendance of all children on that route must be taken by the teacher in charge of the bus at the start of the journey.
- 4.3.6. At dispersal time, after attendance is taken, if any child who was present in the morning is missing, the name must be immediately informed by the bus teacher to the Bus-in-charge so this can be tallied with special departure cases as stated in 4.3.7.
- 4.3.7. In case a child who usually travels by bus is being picked up by the parent for some reason, this should be done only after due procedure of request for special departure from parent to the Class teacher, and a specific gate pass signed by the Bus-in-charge. This gate pass is required to be given at the gate when the parent leaves with the child (if in Class 5 or below) or by the child him/herself (if in Class 6 and above). Such exits must be tallied as soon as all buses have left, by the Bus-in-charge, along with list of children who left on the bus. Names of any regular bus-users not present on the bus nor exiting through gate pass must immediately be flagged to the Security supervisor, and contact made with the parent to ascertain that safety is not compromised and the child's whereabouts are established.
- 4.3.8. Care must be taken that at no time should a child (especially a female) remain alone in the bus with the driver and male conductor, and presence of an adult female is essential, whether at the start or at the end of a journey.
- 4.3.9. Routing should be accordingly planned so that the first and last child is not a female; also it is a must to have the didi/ teacher present so that the first and last child, even if male, is not left alone with bus driver/conductor, unless the child is a male student aged 14 years or above.
- 4.3.10. Besides the above measures, it is also recommended that schools encourage children on the bus to form 2 groups for each bus and give them the name of 'Eagles', whose role is to play be an added watchdog. There should be 4-5 students in each group, Group 1 being those who board first and Group 2 being those who board later. These group members should keep an eye within their group while boarding and leaving the bus. Their clear objective is to ensure that each child of their bus route is on the bus and dropped off without anything amiss, (such as a small child remaining asleep in a back row missing his/her stop, or the regular maid not there but the child hops off the bus and wanders off even though exit is not authorized). If the Eagles play their role, they form an added level of security on every bus in addition to the dependable driver/conductor after due screening done by school, and the presence of the teacher and female didi on the bus. This will help to avoid any student going missing and falling prey to any wrong element.
- 4.3.11. Routing of the bus should be planned so that children are dropped as close as possible to their residence. In case of 5 or more children from the same condominium at a bus-stop, it is essential that the children are dropped at the gate itself and the route altered accordingly.
- 4.3.12. The bus driver should ensure that the doors of the bus are closed before he begins moving, children are seated and that no child is directly in front of the doors even when closed. Conductor/helper should also ensure that there is no hindrance in passageways and all emergency exits are clear.
- 4.3.13. At the time the bus begins to move from the spot both on the school grounds as well as at every stop thereafter, the conductor using a whistle

shall be present on the ground to check that clear access is available to move, or particularly to reverse, with no children/others in the way, and indicate with a series of short whistles to proceed, or a long whistle as a caution to stop immediately.

- 4.3.14. Where more than 10 buses are assembled together for dispersal on the school premises, at least 1 person for every 10 buses is required to supervise safe movement out of the school. These persons could be from the Administration department or teachers entrusted with this duty. They will supervise safe and smooth movement of children and buses, and also that there is the presence of an adult female on board before the bus leaves the premises. If no adult female is present, the bus should be detained till a quick alternative female presence is ensured.
- 4.3.15. When children, especially those in Class 5 and below, get off at their bus-stop at/near their homes, it is imperative that they are not left alone on the road but must be handed over only to the parent/maid or authorized representative upon showing the identify card in their custody. The school must impress upon parents that it may not be safe even for older children, especially girls, to walk alone from the bus-stop to their home depending in the specific location and circumstances, and parents should ideally make arrangements for the child to be met. It is the joint responsibility of school and parent to minimize risk to the child and equip them with the confidence to handle risks in an age-appropriate manner; therefore the school must attempt to drop the child off closest to the gate, and should this not be possible, parents must make arrangements to prevent them walking alone or ensure that they are adequately equipped to manage this confidently, with a good awareness of safety skills.
- 4.3.16. In case the parent/representative has not reached to pick-up a child of Class 5 or below, under no circumstances should the child be left on the road. In the event there is another known parent in the same complex willing to take responsibility, this may be permitted as an exception after the teacher confirms this with the parent of the child. If there is no one else to pick up the child, the child may not be permitted to alight, and the teacher on the bus will coordinate with the parent for getting off at the next convenient stop.
- 4.3.17. Once all children are dropped at their stops, the female teacher or didi, who is the last to get off, must report to the Bus-in-charge confirming that the route is completed and all children safety dropped off.
- 4.3.18. The Bus-in-charge will tally all reports and make a call to any bus which has delayed its message reporting completion of route.
- 4.3.19. The Bus-in-charge will routinely monitor that all routes are being adhered to, by frequent monitoring of GPS tracking. In case at the end of the shift, there has been no confirmation from the teacher/didi of the completion of a particular route, the location of the bus through GPS must be immediately identified and an alert sounded to ensure that nothing is amiss.
- 4.3.20. Apart from safe passage of children, the School Bus-in-charge is also responsible to ensure that bus-drivers follow the guidelines below for safe loading/unloading of children at their stops:
  - 4.3.20.1. School buses on the road will follow limits on speed and shall not drive beyond 30 kmph.

- 4.3.20.2. Buses shall accordingly stay on the left lane and not block other faster moving traffic; safety of children should not inconvenience other commuters when not required.
- 4.3.20.3. When the bus stops, the driver should take care that it stops in such a manner that the child need not cross the road, wherever this is feasible.
- 4.3.20.4. Under no circumstances, should any child be made to get off the bus in the middle of a road forcing him/her to walk through moving traffic.
- 4.3.20.5. Stopping of the bus for loading/unloading in a second lane is not permitted as this directly increases safety risk for the child.
- 4.3.20.6. The location of the stop should also be such that inconvenience to smooth flow of other traffic is minimized –i.e. it should not stop in front of a gate or bus-stop or block a turning, as more cars/buses piling up also increase safety risk for children besides creating inconvenience for others.
- 4.3.20.7. The location of the stop should also not be a cause for higher risk (such as at or just before a junction) but the bus should instead cross the junction and stop further up as close as possible to the pavement on the left side (minimum 10m *after* the junction if an inner road, and 50m *after* the junction if a main road).
- 4.3.20.8. If however the location is such that it is not possible to stop without blocking other vehicles, then under such circumstances, a clear priority shall be given to the bus/vehicle that is loading/unloading school children, while other vehicles may wait their turn to enter/exit/cross the access point till the children are safely out of the way. The conductor with his whistle will play the manual role of ensuring other vehicles wait (which could also be performed by flashing lights or movable yellow arrows fitted on the bus if this more advanced signaling is feasible).
- 4.3.21. The School Bus-in-charge is also responsible to ensure that school buses comply with Supreme Court Order (Nimit Kumar guidelines) in this regard and the Surakshit School Vahan policy dated 30.1.14 of the Transport Commissioner in place for the state of Haryana, in respect of the following:
  - 4.3.21.1. Buses should be painted yellow and have the words 'School Bus', name of school and route number displayed prominently.
  - 4.3.21.2. Buses should not have curtains or dark films. They should have internal white lighting and activities in the bus should be visible from the outside.
  - 4.3.21.3. Buses should have a valid certificate of fitness, pollution and insurance certificate.
  - 4.3.21.4. Buses should have horizontal grills on the windows.
  - 4.3.21.5. Buses should have a first-aid box.
  - 4.3.21.6. Buses should have a fire extinguisher.
  - 4.3.21.7. Buses should have working speed-governors and should not be driven at a speed of over 30 kmph.
  - 4.3.21.8. Buses should not carry no more than the specified number of children permissible as per capacity and permit.
  - 4.3.21.9. Buses should have a qualified driver and conductor.

- 4.3.21.10. Bus drivers should possess a valid driving license with minimum 5 years' experience of driving a heavy vehicle.
- 4.3.21.11. The driver should have no previous record of any traffic offences or challans.
- 4.3.21.12. The driver must be reminded to strictly follow all traffic rules and use safe driving habits; specifically he must never answer mobiles while driving.
- 4.3.22. The School Bus-in-charge must ensure that the bus is being driven only by the authorized driver at all times on the route (especially in view of past accidents where some other underage/unlicensed driver has taken the wheel without being unauthorized to do so) by ascertaining from time to time with the teacher/didi on the bus, and/or viewing of bus CCTV footage.
- 4.3.23. The School Bus-in-charge should ensure that all drivers attend a refresher training session every 6 months. The training team must include 2-3 parents who will address the bus-drivers on the importance of safe driving habits, apart from a reminder of important rules/ road signs etc. A basic training module of presentation can be provided by Gurgaon Police; however parents would be in a better position to appeal to these drivers whose driving habits are directly linked to the child's safety and can impress on them the need for extreme caution while driving and while loading/unloading children from the bus.
- 4.3.24. There should be a mechanism to give feedback on the school bus and its driver/conductor by parents or by the public, as follows:
  - 4.3.24.1. The school bus shall have painted on it valid telephone numbers and mail ids of the bus-in-charge as well as the school principal/Admin head for feedback in case of improper driving; it should be updated in case of change of number. This information must be displayed even if the bus is a contract bus and it is the responsibility of the Bus-in-charge to ensure this is complied with.
  - 4.3.24.2. Parents should also be informed of the telephone number and mail id of the Bus-in-charge to whom such feedback can be directed.
  - 4.3.24.3. Such feedback received should be attended to on a priority basis and the matter resolved by ensuring that the driver clearly understands the wrongdoing, and the importance of never repeating the offence is clearly impressed upon him.
  - 4.3.24.4. Due action must be taken against any driver/conductor where warranted, which may include removal of the driver from services if it is a case of dangerous driving.
  - 4.3.24.5. The person who made the complaint must be informed of the action taken based on the complaint within 3 days.
  - 4.3.24.6. The Bus-in-charge should maintain a record of such complaints, to ensure that repeat complaints against a particular driver are flagged so that appropriate preventive action can be taken in advance rather than result in an accident that could have been avoided with the right measures.
  - 4.3.24.7. These complaints must be reviewed by the Head of Admin on a monthly basis.



- 4.3.25. The school must have a system by which the parents should be in a position to remain connected with the school bus in case of emergency or delay. The simplest system is a text sent out in case of delay in bus timing at the stop of more than 10 minutes. The phone number of the bus driver should not be given to parents to prevent him from taking calls while driving. Instead, either the number of the conductor, the teacher or the didi on the bus could be shared. Alternately, one or more designated persons from Admin could play the role of connecting parent and bus staff, so that only the really urgent calls are passed through to the staff on the bus; however if the school decides on such a system, then it is critical that such calls are answered/returned urgently to make such a system work.
- 4.3.26. In case there is a request during school hours to pick up a child (who normally uses the bus) due to an emergency, such exit should not be permitted if the person is not the parent/guardian him/herself, even if they are carrying the identity card, until and unless this has been specifically verified with the parent. Especially if the person is a driver/maid or any other relative, such pick-up may be permitted only once the school has verified this with the parent.

#### **4.4. Ensuring safety for children travelling by means other than school bus:**

- 4.4.1. Children from Classes 6 and above may leave the school premises on their own, but only after signing out in the school register so there is a clear record of the time of departure of the child.
- 4.4.2. Children from Class 5 or below should not be allowed to leave the school premises on their own but must be picked up from the designated spot within the premises by the parent/authorized representative after showing the parent identity card. Handing over the child to the parent/authorized representative must be supervised by the Class teacher /representative /Admin representative.
- 4.4.3. In case the parent who usually picks up the child cannot come to pick up their wards at the last minute for some reason, they must compulsorily inform the school teacher concerned (or the Admin in charge) through SMS or phone, if not informed already in writing through the child by a note or diary where this was known in advance. They may then authorize someone else to pick up their child who must carry the identity card.
- 4.4.4. Handover of child to a person not carrying the identity card must not be allowed, unless in exceptional circumstances where the teacher recognizes the parents or has been informed specifically either on phone or in person explained the extreme circumstances under which the person meeting the child will not be carrying the card.
- 4.4.5. In case there is a request during school hours to pick up a child due to an emergency, such exit should not be permitted if the person is not the parent/guardian him/herself, even if they are carrying the identity card, until and unless this has been specifically verified with the parent. Especially if the person is a driver/maid or any other relative, such pick-up may be permitted only once the school has verified this with the parent.

- 4.4.6. Each morning, the school is responsible to ensure adequate number of security guards are present at the drop-off point for those reaching by cars or on foot/cycles, to ensure that the safety of children is not compromised, and they safely reach the school gate. This is especially important in case the drop-off happens at a distance from the actual school gate and the child has to walk through a public area to reach the school gate.
- 4.4.7. Likewise, at dispersal time as well, the school is responsible to ensure that adequate number of security guards are present at the pick-up point, to ensure that the safety of children is not compromised.
- 4.4.8. School guards at dispersal area should not leave till pick-up of the last student to prevent any single case of a child waiting alone on a public road.
- 4.4.9. School guards should be trained at alertness to watch for any undesirable characters who may be loitering in the area, particularly faces seen frequently even if they have no reason to be present.
- 4.4.10. In case of encroachment of pavements on the road leading to the school (by unauthorized parking/ gardens/ shops, etc.) hindering safe walking path of children, it is the school's responsibility to bring this to the attention of local police station, who will liaise with the concerned authorities to rectify this.
- 4.4.11. Presence of speed-breakers and painted zebra crossings, or table-top pedestrian crossings on both sides of the school entrance on the main road, along with 'School ahead' signs are required to facilitate safe crossing of children and reduce the speed of passing vehicles; if this is not present, your school must inform the local police station, who will liaise with the concerned departments to ensure this.
- 4.4.12. The school must have in place the following measures to deal with the menace of underage driving, which is an offence and directly places the child and other commuters on the road at risk
  - 4.4.12.1. Gate guards must report any such cases immediately to the Admin in charge, who will in turn report to a higher authority.
  - 4.4.12.2. The child or children in question must be spoken to by Principal and strongly explained the dangers of this offence.
  - 4.4.12.3. Parents must be summoned, made aware of the seriousness of the offence, and their role by permitting the child use of the vehicle and their undertaking to prevent this from happening again must be obtained.
- 4.4.13. In case of students travelling by private vans hired directly by parents, the concerned parents may contact Gurgaon Traffic Police directly in case they are concerned about any violation by these private vehicles which may risk safety of the children.

#### **4.5. Other measures for safety of children while at school:**

- 4.5.1. All children must be taught in open classrooms, the doors of which should not be locked under any circumstances.
- 4.5.2. Every classroom must have open windows that permit viewing into the classroom. In the absence of windows on the inner corridor, the door must have a clear glass window through which it is possible to view the inside of the classroom from outside. Such window should be open and not covered with newspaper or curtains.

- 4.5.3. If a child has gone out of the scheduled class (or another other session/ games, etc.) for more time than required, the teacher should enquire within the first 15 minutes to ascertain that there is no mishap.
- 4.5.4. There should be separate toilets for girls and boys, for teachers, and for support staff. The Support staff in particular should not be allowed to use toilets meant for children, even if they are assisting in this section.
- 4.5.5. Staff managing toilets should only be female. No male staff should be present on school premises in support roles like toilet cleaners/ attendants.
- 4.5.6. The school must demarcate a curtained area for immediate emergencies in case a sick-room is not possible with a necessary first-aid kit in place. This area should also be on the radar for regular supervision by the Admin-in-charge, to ensure no child detained here is at risk of any sort.
- 4.5.7. Special care and extreme caution are required in swimming pool areas; strict supervision at all times is a must to prevent any case of drowning; at no time must any child be left unattended in or in the vicinity of the swimming pool.
- 4.5.8. In case children have to stay back for after school activities, there should be a reliable authorized adult in charge, preferably a permanent teacher who takes responsibility to ensure safety of children till the final dispersal. (if there is a stayback for sports or swimming, then besides the teachers/masters involved for the subject, a female teacher must mandatorily also be present to supervise).
- 4.5.9. There must be adequate supervision to ensure and curb general roaming around of students in the corridors especially after dispersal time, or in playgrounds when not authorised during school hours.
- 4.5.10. Absence of students: It is recommended that the school puts in place a system to ensure absence of a child from school is noted early in the day which makes it easier in case of accident/kidnapping. If a child is not attending school, the parents must inform the teacher by email or sms not later than 10 minutes after the official start of school. Within 15 minutes after the start of school, each teacher reports the list of names of her/his class who are absent without intimation to the Admin in charge. A school representative then intimates the parent that the child is not present. This will immediately flag a problem case early in the day.

## 5. EDUCATION & AWARENESS BUILDING:

It is important to create an awareness among all sections of personnel associated with a school, namely Children, Staff (teaching/non-teaching) and Parents about the risks involved with regard to child safety and simple preventive measures that can be taken to reduce these risks.

- 5.1. **CHILDREN: creating awareness of bullying, other forms of physical or sexual abuse:** Most children may not be aware of the dangers they are exposed to, a result of two factors - their innocent minds and their trusting personalities. While care must be taken not to instill such terror in them that they are fearful of simple day-to-day living, it is essential to give them enough of an idea of some evils that do lurk and what they can do to prevent them. The objective is to make them

more confident in dealing with any dangers and honing their safety-skills, especially in public places. Bullying as a concept is easily understood and far easier for the school to put inputs in place, as part of its Anti-bullying policy. Likewise, physical abuse where a child is frequently kicked or pushed and therefore hurt physically are far easier to report and manage. It is in the grey area of sexual abuse that most schools fall short of in the aspect of creating awareness among their students and therefore which this section focusses upon. Accordingly, the School Counsellor along with teachers must plan a session for children of different ages, giving them age-appropriate inputs about simple concepts, covering bullying, internet bullying, internet predators, other forms of victimization, physical abuse but especially sexual abuse, apart from sessions on growing up, avoiding teenage vices, etc. These could be woven into classroom discussions spread out over the term, or structured as one or more separate talks or a half-day workshop. Ideally, the children should discuss this in the classroom as well, and parents must be kept informed, so that they can have a parallel discussion in the next few days at home, to reinforce support for the concepts and modalities discussed for keeping children safe. Continuing with brief discussions on the subject at least once a month is recommended to keep the communication open and make children more comfortable with speaking about these topics which otherwise become taboo to speak about.

Essential inputs to be included are:

5.1.1. **Good touch, Bad touch** – a child, even as young as 2 or 3 must be told about the difference between good touch and bad touch (also explained as safe and unsafe touch), and specific parts of the body which should not be touched or circumstances which makes these exceptions okay (specifically only mother giving bath, doctor examining in presence of parent, etc). The child must understand that if the touch makes him/her uncomfortable, s/he must report it, and must be encouraged to report feeling uncomfortable from a very early age. Use of the following videos easily accessible on youtube are strongly recommended:

Good touch, bad touch (Hindi) –

<https://www.youtube.com/watch?v=l9s4fkEb4HY>

Good touch, bad touch (English) –

<https://www.youtube.com/watch?v=4KWan3N-yhM>

<https://www.youtube.com/watch?v=Vky0xqtW6W8>

5.1.2. **Stranger safety:** children from a small age, even as young as two, must be trained to be careful of strangers and never talk to strangers, but most importantly, never go anywhere with a stranger. Children must be given specific examples that they must never go with a stranger even if they are told that the mother/father asked him to pick them up because of xyz reason. Also that all strangers may not grab them, but some may entice them with sweets/ice-cream and they should not fall into this trap.

If a stranger tries to take them away or keep offering them sweets, they must follow the next step of Yell, run and tell outlined in 5.1.3.

- 5.1.3. **Yell, Run & Tell** – this simple mantra must be taught to every child. It explains what to do if someone touches you or comes close to touching you in a way that makes you uncomfortable or scared. First step – yell loudly (this has the dual purpose of attracting attention of anyone nearby as well as giving the perpetrator the clear message that s/he cannot get away with this and must stop immediately). Second step – run as fast as you can, to put maximum distance between you and the perpetrator. Third step – Tell – be sure to talk to your teacher/friend/parents about this so that action can be taken.
- 5.1.4. **Dangers from known people:** Children should also be made aware that it is not only strangers who may cross the line with bad touch, but it is often known persons as well who could do this, after making them promise to keep the secret. They must be encouraged to share this immediately with a trusted adult.
- 5.1.5. **Internet safety** and importance of not disclosing personal details to internet strangers, who could in fact be predators living in the area and using a false identity; encouraging them to share with parents any such contacts they are uncomfortable with so that the parent can guide them make sensible decisions.
- 5.1.6. **Breaking the code of silence:** Many children believe that it is better to remain silent rather than report an offence to themselves or others, for the following reasons:
- 5.1.6.1. They believe they may get into trouble or get a scolding by reporting so prefer to remain silent.
  - 5.1.6.2. They may have been threatened that if they tell, they will be killed/harmed or are blackmailed into silence by some other threat.
  - 5.1.6.3. A lot of children know instinctively that when someone tries to abuse them physically that something is wrong. To their simple minds however, it is not clear who the wrongdoer is. They are not clear that the problem is not with them but with the other person, so mistakenly assume they may be part of the problem and therefore remain silent.
  - 5.1.6.4. Children frequently form an unspoken code of silence by not reporting abuse they may be aware other children are facing (similar to the pact of not sneaking about each other when, for example, the teacher asks which child threw the paper rocket) when they feel they should stand up for each other against the teacher and not tell. A case of abuse is mistakenly considered by the child's simple mind as also falling into this category – so s/he feels s/he is protecting his/her friend by not sharing the secret, when in fact he could protect his/her friend better by exposing the abuse. The child must be made to understand that sharing the secret in this case falls into the category of responsible bystander behaviour, which is quite different from sneaking or telling tales, and s/he should therefore not hesitate to speak up in confidence and help out his/her friend.
  - 5.1.6.5. The importance of telling – Children must be made to understand that this code of silence they adopt when they or someone else is

being abused can only make the problem worse as the perpetrator knows s/he has got away with the misdemeanor. Already having a depraved mind, such a person will be emboldened to keep trying this again and again. Children need to be made to understand that the more they keep silent, the more chance for unpleasant events to recur. Also, in that particular case, the longer they wait, the more serious the problem becomes. The more they report it, the less such incidents will happen. The earlier they report it, the less dangerous will be the consequences. Bringing this to the attention of a responsible adult will ensure that the child gets help and the problem stops, so they must consider it a responsibility and not hesitate to help. It is in fact considered good citizenship, even heroic to go to a teacher to share that a fellow-student is in trouble and children should be encouraged to do so in complete confidence.

5.1.6.6. Children should be made to understand the kind of things they should report:

5.1.6.6.1. something that happened to them personally by way of strange behavior, bad touch, etc.

5.1.6.6.2. something of this nature that happened to another child they may be aware of directly or indirectly.

5.1.6.6.3. something they saw in another person's belongings/bag (be it another student/ any other person on school premises) they should not have such as a knife, gun, cigarettes, etc.

5.1.6.6.4. something that tells them another child is in danger – a wound, blood stains, a cut on a wrist, etc. which are unexplained and the child does not want to talk about

5.1.6.7. Children must be encouraged to break the code of silence in case of situations described above by:

5.1.6.7.1. persuading the other child to tell a trusted adult

5.1.6.7.2. offering to accompany them, or tell someone on their behalf

5.1.6.7.3. if the affected child insists they want to keep it secret, then they can help by going themselves to a trusted adult and reporting the problem in strict confidence

5.1.6.8. Children must be reassured that there will be no negative consequence of reporting any incident that makes them uncomfortable, and the only consequence will be the positive one of improved safety for all children/ the child in particular.

5.1.6.9. Children must also be made to realize that they should not feel afraid to approach their parents, elder siblings or other family members in reporting such incidents if they happen in school or even in the society/home; if there is a distinct fear to approach family members or there is at all a possibility that the abuse is happening in the home by a family member/helper/ neighbour, then the children should be assured that the teacher will help them resolve this problem and they must not be afraid to approach the teacher or School Counsellor. This reporting can happen only if the child is made to feel safe while speaking, has sufficient trust in the person, and is frequently

encouraged to speak of even the smallest discomfort, wherever it may be happening, whether at home/society with a parent, driver, maid, neighbour or at school with a teacher, helper, bully, etc.

- 5.1.7. **Road Safety:** A basic sense of road safety must be taught to children as early as possible in the classroom. Inputs would be age-appropriate namely:
- 5.1.7.1. for very small children, inputs must include
    - 5.1.7.1.1. never to walk on a road without an adult
    - 5.1.7.1.2. when walking with an adult, always to walk on the inner side of the road, not on the side of the traffic
    - 5.1.7.1.3. wherever possible, use the pavement
    - 5.1.7.1.4. never run across a road; while crossing, walking is better so oncoming vehicles find it easier to predict your path
    - 5.1.7.1.5. how to cross a road – look right, then left, then right again (many adults themselves do not follow the second two steps, and therefore the child being aware of this is a good way for a child to take responsibility and remind the adult)
    - 5.1.7.1.6. Always use seat-belts; never stand in front seat of a car.
  - 5.1.7.2. Apart from the above, and especially for older children, basics of pedestrian safety must be explained including:
    - 5.1.7.2.1. always be alert when walking on a road that you are not in the path of any oncoming traffic
    - 5.1.7.2.2. never use headphones or mobiles while walking/cycling on the road; focus completely on traffic and your own safety
    - 5.1.7.2.3. never walk behind a vehicle or bus that is reversing; preferably wait till it has stopped moving or cross from the front of the vehicle rather than behind it
    - 5.1.7.2.4. if you must move between cars parked on the road, make sure you walk on the inner side rather than the outer side of the parked cars, to reduce proximity to moving vehicles.
  - 5.1.7.3. For children who may cycle or walk to school, basic road precautions must also be explained, including right of way, hand signals, etc.
  - 5.1.7.4. All children must be taught basic traffic rules, so they can influence the adults who drive them, and also imbibe this discipline for when they begin driving. They must specifically learn to never jump red lights and respect signals, use seat-belts/helmets, never over-speed or drive the wrong way, while using phones or after drinking alcohol.
  - 5.1.7.5. Dangers of underage driving – the school must impress upon older students the dangers of underage driving and driving without a license, either by motorbikes, cars etc. They should be made aware that this is a clear offence and of their responsibilities to abide by these rules from a safety perspective. The school should also make them aware of preventive measures in place to ensure there is no underage driving, as mentioned in 4.4.12.
  - 5.1.7.6. Any student older than 18 must be made to understand the critical important of helmets/seatbelts, strict adherence to speed limits, traffic signals, etc. to prevent fatalities common among youngsters.

5.1.8. **Self-defence lessons:** Many children, especially those of smaller build or girls, tend to feel far more confident if they have exposure to some form of self-defence. It is therefore recommended that the school organize self-defence classes for children of all classes as part of its curriculum and ensure every child is aware of some basic form of self-defence.

5.1.9. **Legal Literacy clubs:** Legal literacy clubs are to be formed in every school through which students must be made aware of their legal rights and duties under the Constitution of India, as per order passed for state of Haryana vide authority letter 7231-33 dated 17.05.12 and letter no 8246-49 order passed in Haryana dated 8.6.12. Relevant aspects of the school safety policy, the POCSO Act, JJ Act, every other provision of law that covers crimes against women and children, and road safety provisions of the Motor Vehicles act must be discussed with students to make them aware and alert about the subject of safety, their responsibilities to adhere to the provisions and rights/penalties if any provisions are violated.

5.2. **TEACHERS: understanding responsibilities:** Every teacher must be made aware of responsibilities as protector of children in his/her custody, and carry out the same with diligence. Teachers are particularly well-placed to observe and monitor children for signs of abuse, to recognize and respond to such abuse. They are the main caregivers to children outside the family and have close contact with children on a regular basis and accordingly can play a key role to prevent/detect abuse. Some aspects to ensure this:

5.2.1. **Responsibilities:** Apart from responsibilities relating to education and imparting knowledge and skills to children, every teacher has additional responsibilities as care-giver to the child, specifically:

5.2.1.1. To ensure that the child comes to no harm, especially during the time the children are assigned to him/her

5.2.1.2. To assist the child in developing self-esteem, confidence, independence of thought and the necessary skills to cope with possible threats to their personal safety, both within and outside the school

5.2.1.3. To encourage a climate of open communication with children so that information about abuse/violence with any child does not remain 'secret' till too late, but problems are reported early and can get nipped in the bud. Students are more likely to turn to trusted adults for help in resolving problem in a climate of safety, and the teacher must make children feel safe in their interactions with him/her.

5.2.1.4. To report any aspects that are at risk with regard to arrangements that should have been in place to protect the child from any danger or harm, so that any lapse could be immediately rectified, thereby preventing the dangers from happening/recurring

5.2.1.5. To report any untoward incident that may come to their attention either directly or indirectly

5.2.2. **Punishment of a child:** While it is the role of a teacher to make the child understand the need for discipline and accordingly face consequences for



lapses, care must be taken that such consequences do not cross the line by way of being very harsh punishments that are damaging to the physical or mental health of the child. Accordingly, teachers must clearly be made to understand which disciplinary techniques are permissible and which are not. The following ways of punishing children are not acceptable and fall into the non-permissible category. Indulging in any of these by any teacher is a punishable offence and must be avoided at all costs:

- 5.2.2.1. **Seclusion**: Isolating the child or locking him/her alone or in a small group in a room that is dark, small, secluded or unpleasant in any other way. Such seclusion besides being cruel also puts the child at higher risk of being abused, being more vulnerable.
- 5.2.2.2. **Restraint**: Restricting a child's freedom of movement such as tying him/her to a chair, to another child, etc. Restraint can become fatal when it prevents a child's ability to breathe. Even in jest, use of ropes, duct tape, chairs with straps etc. should not be used.
- 5.2.2.3. **Violence**: Pulling the child's hair, or physical hitting, punching, throwing a book or chalk at the child or hurting him/her in any way must strictly be avoided.
- 5.2.2.4. **Humiliation** in other forms is also to be strictly avoided:
  - 5.2.2.4.1. Denying the child food or water or toilet facilities
  - 5.2.2.4.2. Forcing the child to stand in the sun
  - 5.2.2.4.3. Removal of any item of clothing of the child and forcing them to stand in front of the class

### 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 1<sup>st</sup> 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.

### 5.2.4. Awareness sessions:

- 5.2.4.1. Teachers must be reminded of their responsibilities and expected behavior by a group awareness session(s) conducted at least once a year for all teaching as well as non-teaching staff.
- 5.2.4.2. They should also be made aware of the relevant salient features of the law in this regard (specifically the two existing comprehensive legislations for the protection of children, namely The Juvenile Justice (Care & Protection of children) Act 2000 and the Protection of Children from Sexual Offences , Act 2012)

- 5.2.4.3. A further objective of such a session is to make them aware of behaviour indicators that traumatized children sworn to secrecy by the abuser may demonstrate. Such incidents could be occurring outside the school as well (bus, during private tuitions, in the child's own home by family members/helpers/drivers/neighbours, etc.). Being the closest adult contact in school, teachers must be tuned to pick up such signs that could indicate that the child is one who is being abused (further details of such signs are listed in the next Section under the sub-head Parents – Sec5.4.3)
- 5.2.4.4. During the sessions, it should also be highlighted that pedophilia is a sickness, and if the teachers come across anyone entertaining such thoughts, they should ensure such person has access to anonymous counselling with the help of the School/external counsellor. Only if such a person is encouraged to deal with his/her own primitive instincts in this regard, can there be a chance of recovery; however if there is suspicious behaviour demonstrated by any person, a warning flag must immediately be raised to the authorities and a tight vigil kept on the person's movements.
- 5.2.4.5. Teachers are bound to bring to the notice of management any incident that they may come to know of, directly or indirectly concerning any child even if not in their class, or any other teacher/ staff. They will report in confidence to the School Counsellor, or Principal, as per the formal feedback system in place for the school as described later in this document. The same code of silence that children feel compelled to follow often traps teachers into silence as well, when the matter impacts a colleague of theirs, or even more than one colleague if the abuse is happening between two teachers. It must be impressed on every teacher that their silence would have a disastrous impact on the other person, and though more convenient to remain silent, their courage to address the issue confidentially with the School Counsellor or another trusted Staff-member in authority will be the best way of curbing and resolving the problem.

**5.3. NON-TEACHING, contractual & Class IV STAFF: understanding their roles and responsibilities:** An awareness session must be held particularly for Class IV staff, male or female, by a senior staff member and the School Counsellor. The objectives of such a session are:

- 5.3.1. To make them aware that they too have a role to protect children from any harm.
- 5.3.2. Specific do's and don'ts must be covered, including listing the kind of accidents/incidents they can help prevent.
- 5.3.3. Specific areas of the campus linked to the person's role where access is permitted/not permitted (e.g. sports vs canteen vs toilets vs labs etc.)
- 5.3.4. Especially since this group would include toilet attendants, it is important to specify protocols for intimate care (assistance in toileting of smaller children, changing for swimming, etc.), so that while changing children, they are

careful not to compromise dignity, nor force the child to be naked in front of others, ensuring girls and boys are changed separately whatever their age.

- 5.3.5. To make them aware that failure to comply and the punishment it could result in (clearly linking errant behaviour with strict consequences including not just dismissal but criminal arrest including imprisonment; this should clearly be listed as a deterrent for carrying out such behaviour)
- 5.3.6. During the session, it should also be highlighted that pedophilia is a sickness, and if they come across anyone entertaining such thoughts, they should ensure such person has access to anonymous counselling with the help of the School/external counsellor. Only if such a person is encouraged to deal with his/her own primitive instincts in this regard, can there be a chance of recovery; however if there is suspicious behaviour demonstrated by any person, a warning flag must immediately be raised to the authorities and a tight vigil kept on the person's movements and they have a role to play in this.
- 5.3.7. They have a responsibility to report any incident they may come to know of, or any suspicious behaviour on part of any other staff; without fear of consequence as their report will be treated with utmost confidentiality. Again, the abuse may not involve only a child but two other adults, in which case too, they must be encouraged to report this as it is the best way to curb and resolve the matter.
- 5.3.8. At the end of the session, the staff could be made to sign a summary of what their responsibilities are and their promise to protect the children, so this is a signed document similar to the code of conduct, evolved specially by the school in keeping with its values and the objectives such a code of conduct is intended to achieve.

**5.4. PARENTS – understanding of important roles:** While it is difficult for the school to be responsible for the way parents behave, it is possible for the school management to communicate clear expectations to parents on policy matters relating to child safety, with the objective that parents and the school can jointly facilitate safety of children by partnering to convey the same messages to the child so there is no confusion in the child's mind. This could be communicated through a circular but is far better addressed through a session conducted specifically for parents by the School Counsellor for a couple of hours. Communication should include:

- 5.4.1. **Responsibility of adherence to school systems/policies:** Clear guidelines to parents on rules for entry/exit/identity cards/pick-up/absentee intimation, etc. which parents must comply with
- 5.4.2. **Communication with children:** Requests to parent to have a conversation with their children on specific aspects of safety, especially:
  - 5.4.2.1. **Stranger safety** (specific advice to the child that s/he must report any case where a stranger tried to entice him/her with him even if s/he did not go); good touch–bad touch (also safe-unsafe touch) and emphasizing how important it is for the child to report incidents that make him/her uncomfortable in order that the problem is solved and does not recur.

- 5.4.2.2. **Internet safety** and importance of not disclosing personal details to internet strangers, who could in fact be predators living in the area and using a false identity; encouraging them to share any such contacts they are uncomfortable with so the parent can guide them make sensible decisions.
- 5.4.2.3. **Telling the child that they must not feel afraid to come to the parent if something is troubling them, and reassuring them that they would not get a scolding but can be sure of help from the parent to solve the problem** (this assurance is critical for every parent to give their child, as it could make a big difference in cases especially where the relationship is very formal or distant and the child is more likely to hesitate; having heard such a reassurance could be a motivator for a child to break his silence; not having such a reassurance almost certainly would result in the child not reporting any such incidents and suffering silently). **Accordingly, this point must be treated as a crucial step by parents in safeguarding their children and having such a conversation at the very earliest.**
- 5.4.2.4. **Communication avenues:** Parents could use the opportunity of discussing with their children incidents reported in newspapers from time to time in an open manner, with a view to making children comfortable to bring up such topic in discussions (e.g. case of little girl molested by guard in condominium lift). The focus of these discussions should be what constitutes bad touch, what could have prevented such a situation, what would you do in such a situation, etc...
- 5.4.3. **Behaviour indicators:** Parents must be made aware of behaviour indicators that traumatized children sworn to secrecy by the abuser may demonstrate. They must approach a doctor/counsellor immediately if their child displays any of the following signs, such as:
- 5.4.3.1. extremely withdrawn behaviour, not wishing to engage and speak as s/he usually does
- 5.4.3.2. not wishing to go to school (or venue where the abuse has taken place such as bus, tuition, etc.) by feigning illness
- 5.4.3.3. visible distress after having returned from the specific trouble spot where the abuse is taking place (be it school/tuition/coaching etc.)
- 5.4.3.4. displaying symptoms of pain or more likely trying to hide pain, especially while bathing, sitting, walking.

## 6. FEEDBACK MECHANISMS

Every school should attempt to put in place a series of various levels of checks and mechanisms by which any untoward incident that puts the safety of children at risk is firstly prevented, but in the unfortunate event it occurs, then it is immediately reported. Children must therefore be made aware that if there is any problem they experience, it must be brought to the attention of a responsible adult at the very earliest. Accordingly, they must be encouraged to speak up to any of the following persons in case they have

any form of abuse: their class teacher, any other teacher, school counsellor, buddy/dost/saathi (as explained below). If a child is still hesitant to approach any of the above at the school premises itself, then the child must immediately report to a parent. If the abuse is happening outside the school, perhaps at the home by a relative or neighbour and the child is hesitant to approach the parents, then the child must approach someone in the school or at least another child.

To provide multiple feedback channels to suit the inclinations of every child, the following feedback mechanisms are suggested for every school:

**6.1. Concept of Buddy (or Dost or Saathi) (suggested)** – every child must be encouraged to have an avenue by which any single case of abuse gets reported. Some children are more outspoken, and some are quiet by nature. However, in case of abuse, it is not just the quiet ones but the outspoken ones as well who may fall into silence for various reasons. Accordingly, having a channel through which such cases may come to light is essential. Assigning a 'buddy' (or dost or saathi) from an older class is one good way to doing this. Children from older classes may be assigned to one or two younger class children as a formal buddy. The buddy plays the role of mentor and interacts with children to build rapport, so they can share stories of bullying, abuse or other such problems. This is especially useful for those children who do not have an older sibling, as they now have an older friend they can share problems with. It may not be feasible to have buddies in the ratio of one per child, but it can definitely be done to have one for every 5 children, or at least one per class, so that children know a specific name of a senior student they can talk to, if they are hesitant to talk to an adult.

**6.2. School Counsellor (mandatory)** – Every school must have a qualified Counsellor with the following objectives:

6.2.1. The minimum qualification of the counsellor must be B.A Psychology, though it is recommended to recruit a person holding a Masters in Psychology or allied fields.

6.2.2. In a school with girls, the School Counsellor must necessarily be a female.

6.2.3. The role of the Counsellor will be to prevent any problems from happening by advising the school management on specific interventions required and a close rapport with the children, and addressing problems if and when they do occur.

6.2.4. The Counsellor will handle any problem cases among children, be it simple problems of coping which create a sense of being unsafe, cases of bullying to cases of physical or sexual abuse.

6.2.5. The Counsellor must attempt to have a close rapport with children, and be seen as approachable, yet discreet; people should feel comfortable to approach him/her with problems such as a girl being stalked, or a boy falling into bad company and wishing to get out but needing help.

6.2.6. The Counsellor should visit each class at least once a term – even if for just half an hour, to connect with children, where appropriate discussions can take place, but more importantly, there is interaction between child and counsellor so that a rapport can be built.

- 6.2.7. The Counsellor should interact closely with class teachers to be updated on any particular children who are facing problems, so that the counsellor can then build a direct rapport with such children.
- 6.2.8. In case of any suspicion that a child is a possible case of abuse, the matter must immediately be brought to the attention of the Counsellor who will handle the child, and involve parents and senior management in a discreet manner.
- 6.2.9. In the absence of an appointed school Counsellor, the School Principal shall directly connect with a qualified counsellor who can be consulted in case of extreme problems.
- 6.3. **Helpline (mandatory)** - Every school shall have a Helpline number clearly displayed on Notice-boards and telephone lists, so that any child could approach this helpline confidentially in case of a problem. The helpline should ideally be a dedicated easy-to-remember number, but could also be an intercom number or the number of the Counsellor who will handle calls discreetly. In addition, children must be made aware to dial the Police Control Room 100 in case of emergency. The Child Helpline 1098 must be publicized through notices as well.
- 6.4. **Complaint box (mandatory)** - Having a complaint box (which should not be placed in front of a CCTV camera) in a corner is a likely way to get more children to share problems about themselves or others, which they may otherwise withhold, especially those children who do not feel comfortable to tell another person. The complaints will be viewed and addressed by the SSC as specified in 6.7.4.1.7
- 6.5. **Suggestion boxes/ hotlines / tell-an-adult (suggested):** In addition to the earlier-mentioned channels suggested for reporting abuse, other means of anonymous reporting systems such as student hotlines, suggestion boxes or tell-an-adult campaigns could be used to encourage feedback. The more feedback channels the school is able to put in place, the higher the chances of any untoward instances being reported.
- 6.6. **Anonymity of informers:** To maintain confidentiality of the complainant or person giving feedback in case of abuse or suspected abuse or any other feedback, anonymity shall be guaranteed. Accordingly, all anonymous complaints/feedback will also be accepted and acted upon by the School Safety Committee (as detailed in 6.7), whether received through any of the above means or by fax, telephone, mobile text message, whatsapp, letter or any other means of communication.
- 6.7. **School Safety Committee SSC (mandatory)** – Every school must have a School Safety Committee whose objectives will be to ensure safety of children in the school in every respect.
- 6.7.1. **Specific scope** of the SSC shall be to ensure safety of children in the following aspects:
- 6.7.1.1. from risk of kidnapping by any person, within or outside the school, while at or travelling to and from the school or during school trips.

- 6.7.1.2. from abuse, be it verbal, physical or sexual by any member of staff, be it teaching/non-teaching/contractual, older students or any other person on the premises/transport route or during school trips.
- 6.7.1.3. from bullying, threats by older children (specific attention is drawn to problem as reported of older children seeking protection money or favours from younger children)
- 6.7.1.4. from internet/cyberbullying/abuse on facebook/twitter/youtube etc by circulation of undesirable/objectionable material by school children or staff involving school children.
- 6.7.1.5. from misuse of electronic or telephonic media leading to obscene emails/texts/videos etc. during or after school hours by students or staff involving school children
- 6.7.1.6. from traffic accidents at/outside premises while boarding buses, crossing roads in vicinity, etc.
- 6.7.1.7. from accidents on premises due to fire/short circuits, other physical dangers, etc.
- 6.7.1.8. from threats by natural calamities such as earthquakes, flooding etc.
- 6.7.1.9. from accidents/any sort of mishaps during travel on school buses or while on school trips.
- 6.7.1.10. all of the above threats with specific attention to any special needs children who may be a part of the school.

**6.7.2. Composition:**

- 6.7.2.1. The following shall be members of the School Safety Committee: Vigilance Officer, Safety Officer, Admin-in-charge (to whom bus/transport also reports and/or Bus-in-charge as well), School Counsellor, at least 3 teachers representing each section of the school (junior, middle, senior), apart from these, at least 1 Principal/Vice-principal and at least 4 parents representing the parent community.
- 6.7.2.2. Parent representatives:
  - 6.7.2.2.1. The number of parents on the SSC must adequately represent the size of the school with at least 1 parent representative for every 500 students.
  - 6.7.2.2.2. In case the school has any special-needs students, then it is compulsory for at least one special-needs parent to be on the SSC.
  - 6.7.2.2.3. Parent representatives will be nominated by the parent body not by the school management.
  - 6.7.2.2.4. It shall be open to any parent to be nominated as a member of the SSC against the available seats for parent representatives on the SSC, and the school management cannot deny membership to any specific parent.
  - 6.7.2.2.5. Parent representation should be on a rotational basis every 6 months, to give more parents a chance to participate.
  - 6.7.2.2.6. Names of those parents who are members of the School Safety Committee must be publicized on school

website/notice boards/circulars, so that other parents can connect with them in this regard. Failure of the school to share this information prevents other parents from participating in the school safety programme.

**6.7.3. Frequency of meeting shall be:**

6.7.3.1. once every 15 days in the first three months of implementation; thereafter once every month.

6.7.3.2. in case of any case of abuse, the SSC will meet immediately upon such a case coming up, and have relevant follow-up meetings to ensure the case is treated as closed in all respects. This includes punitive measures as appropriate to the abuser in question, assistance to the child and family by way of counselling, updating of personal records to reflect the misdemeanor of the person.

**6.7.4. Responsibilities**

6.7.4.1. It shall be responsibility of the SSC to:

6.7.4.1.1. Assess that the school, its children and staff are safe from all risks as per the scope of the committee, and accordingly ensure that no untoward incident takes place by putting adequate preventive measures in place.

6.7.4.1.2. Publicize the importance of safety as an objective within the school through posters displayed in prominent areas to state: *This school is a Safe Zone; Help us ensure that you are safe from physical hazards, from bullying and from any kind of abuse. Please report any threats to your Teachers/ Counsellor/ any SSC member or School Helpline number.... or call Child Helpline 1098.* (names & contact numbers of SSC members must also be displayed)

6.7.4.1.3. Ensure that a full day orientation on Child Safety and Protection issues is conducted for all staff once a year; and for those who join mid-way through the year, relevant material is made available to them within one week of joining to update them of the school policy in this regard.

6.7.4.1.4. Ensure that the training session for bus-drivers is conducted every 6 months in coordination with the Bus-in-charge, with active involvement of parents in the session to reinforce the need for safe driving habits.

6.7.4.1.5. Ensure that the Vigilance Officer and Safety Officer both interact with the contractual and Class IV staff regularly on both a formal/informal basis, and have a ear-to-the-ground approach to ensure that do's and don'ts are being adhered to. It must also be conveyed to Class IV staff via these officers that the school has a zero-tolerance approach for any abuse to children. In case of any adverse feedback, be it suspicious behaviour or more definite indicators, the officers should promptly notify these concerns to the



School Counsellor or during the next SSC meeting to initiate investigations and other remedial actions.

- 6.7.4.1.6. Ensure that the Safety Officer assesses that all safety risks from physical hazards, storage of any hazardous material etc. are reviewed weekly as per Section 2.4.4, with a clear list of checks and balances, and the Vigilance Officer assesses overall disaster risks every month as per Section 2.4.1. These will be reported during SSC meetings and pending action listed for specific follow up, which will be assessed for in the following meeting.
- 6.7.4.1.7. Monitor the complaint box and ensure that every single complaint is addressed
- 6.7.4.1.8. Ensure that the school safety plan as per 2.4.8 is prepared well in advance for submission to local police station by 1<sup>st</sup> January each year, and all stated measures carried out to ensure that the school is a safe zone in every respect.

#### 6.7.5. **Post- meeting:**

- 6.7.5.1. Action points and responsibilities must be shared with the Principal who will follow-up to ensure these are carried out.
- 6.7.5.2. Minutes of the meetings must be kept as a record.
- 6.7.5.3. Care must be taken that confidentiality is not compromised by ensuring the name of a child is not mentioned if the case is of a slightly sensitive nature.

#### 6.8. **School Board** (mandatory):

the School Board (or by any other name so referred to, such as School management / Governing board / Governing council / School Society etc. is the authority which is ultimately responsible for safety aspects of the school.

##### 6.8.1. **Responsibilities –**

- 6.8.1.1. The board will assume primary responsibility for the care, safety and welfare of each and every child within the school.
- 6.8.1.2. Under no circumstances can a school make parents sign any document accepting that the safety and security of children is not that of the school; **it is clarified that the responsibility to ensure safety of children while on the school premises, including time spent in extra-curricular activities before or after classes, during travel on school buses and while on school trips is solely that of the school management.**
- 6.8.1.3. The board must communicate a zero tolerance policy towards issues of abuse, and use all its energies to ensure a space free of any risks of abuse for every child, especially those with special needs.
- 6.8.1.4. It will review any problems, take preventive action and put into force a strict system for punitive measures for any misdemeanor on the school premises, be it by a student, staff or outsider.

- 6.8.1.5. Board members must interact with students, parents, teachers and other stakeholders to keep a tight check on the security standards of the school, and any improvement areas.
- 6.8.1.6. It will ensure that the code of conduct document as applicable is in place and signed by all school staff.
- 6.8.1.7. It will ensure that the mandatory awareness sessions for Teachers, Support Staff, Bus-drivers, Children, Parents as applicable have been duly carried out.
- 6.8.1.8. It is the specific responsibility of the School Board to ensure that every member of the school staff is familiar with the Child Protection Policy and POCSO act through Teacher training sessions, and children are made aware through Legal Literacy Clubs. Detailed documents on all these are available for downloading on the internet.

**6.8.2. Modality:**

- 6.8.2.1. The SSC will report to the School board and will be the instrument through which the Board will push and enforce its safety agenda.
- 6.8.2.2. The School board will meet at least once every 2 months with agenda of Safety of children as a specific agenda point, with special focus on additional measures to be taken for children with special needs. Failure to do so will attract penal action upon inspection of the same. Review of problems and preventive measures to prevent recurrences, as well as other compliance issues must also be discussed and resolved.

## 7. MECHANISM FOR REPORTING A CASE OF ABUSE:

- 7.1. Routing of feedback/complaint which is of a preventive nature:** In case a child feels the need to report discomfort of any sort against any process or person that makes him/her feel threatened, the child must be made aware of the ways to approach the school management, to bring such cases to light
- 7.1.1. Reporting could be through the class teacher, any other teacher, counsellor, buddy/dost, helpline, complaint box or through any other responsible adult whom the child trusts in this situation.
  - 7.1.2. All school Notice boards shall display the Safe zone poster (under Feedback Mechanisms - Section 6.7.4.1.2) so that children are aware of how to route their feedback in case of any problem.
  - 7.1.3. Any feedback that is of a preventive nature must be immediately brought to the attention of the relevant person (be it Safety Officer, Vigilance Officer, School Counsellor) and if necessary, a special meeting of the SSC called.
  - 7.1.4. **Remedial measures must be taken to prevent recurrence of the problem within 3 working days.**
  - 7.1.5. A log of such feedback received and action taken must be maintained, which is subject to inspection.
  - 7.1.6. Such log must not compromise confidentiality of the child, so depending on the sensitivity of the situation, it may be decided to withhold the name of the

child in the log, or just list the roll number rather than name, which will be decided by the School Counsellor and Principal.

**7.2. Routing of feedback/complaint about a specific case of physical abuse or bullying:** this must be dealt with, or escalated if there is injury of a severe nature while ensuring the following critical procedures:

- 7.2.1. **Immediate actions:** this must be immediately brought to the attention of the School Counsellor, Principal, parents of the child and appropriate remedial action taken to ensure the child is protected and the abuser/bully is penalized and cautioned with strict warning or more serious punishment if warranted.
- 7.2.2. **Confidentiality:** the name of the victimized child must be kept confidential, except from those specific teachers/counsellors who may need to be aware so they can provide the necessary support. Likewise, the name of any other child/children who helped in passing the feedback to the management must also remain confidential; this is to ensure that they are not victimized by any other affected parties in the system nor become the focus of unwanted attention.
- 7.2.3. **Medical attention:** depending on the extent of injury, the school must provide immediate first aid, and bring in a qualified medical practitioner if warranted, and if the extent of injury is serious, then it is the responsibility of the school management to rush the child to the nearest medical facility, while informing the parents of the extent of the crisis.
- 7.2.4. **Transparency:** Schools found withholding facts of how the stage of injury /condition was reached from the parents (e.g. child fainting after being slapped by teacher or made to stand in the sun without water as punishment) are liable for penal action, and a criminal arrest can be issued against the person responsible for the abuse as per the relevant law in place.
- 7.2.5. **Expert assistance:** Depending on the severity of the case, an expert counsellor to assist parents/family may be brought in to guide the child/family on how to cope with the situation. The School Counsellor should play a key role. In the absence of the School Counsellor for any reason, assistance from a trained Counsellor must be taken immediately.
- 7.2.6. **Mandatory Reporting: Immediate intimation to the local police station about the incident is also mandatory, especially if it involves serious injury to the child,** or use of weapons such as knives, guns to ensure that suitable arrests can be made as applicable, and as a deterrent for future cases.
- 7.2.7. **Time frame for action:** the school must initiate investigations within the first 24 hours, whether or not it is a working day if it is severe case where there is injury to the child requiring medical attention; if it is a routine case, then investigations must begin by the first working day. An enquiry will be conducted by a team constituted by the school, with minimum 3 members of the SCC. The report must be submitted within 2 days. Punitive action must be taken against any person found guilty within 7 days of the incident, and personal records updated accordingly.

**7.3. Routing of feedback/complaint about a specific case of sexual abuse:** In case there is a specific complaint of sexual abuse, then this must be escalated to ensure speedy redressal while taking care of the following critical procedures:

**7.3.1. Immediate actions:**

7.3.1.1. if the abuse happened at the school or during travel, this must be immediately brought to the attention of the School Counsellor, Principal and parents of the child.

7.3.1.2. If the abuse happened at home, then this must be discussed by the School Counsellor and at least one other SCC member, to decide which is the best way to protect the child, and accordingly the parent(s) not involved in the abuse may be informed.

**7.3.2. Confidentiality** – at no stage must the name of the child be made public, nor the name of any other child/children who helped in passing the feedback to the management; this is to ensure that they are not victimized by any other affected parties in the system nor become the focus of unwanted attention.

**7.3.3. Medical attention:** depending on the extent of injury, it is a priority to provide medical attention to the child. Ideally, with parents present, it is the responsibility of the school to take the child to the nearest medical facility. If the parents are found to be responsible for the abuse or have been complicit in it by ignoring abuse they were aware of, then it is advisable for the School Counsellor/trusted teacher to play this key role so that the child feels protected and safe.

**7.3.4. Child safety expert:** Presence of a Child safety expert to assist parents/family: it is critical that an expert is involved to guide the child/family on how to cope with the immediate situation and to deal with the rehabilitation process thereafter. The School Counsellor should play a key role, and if not competent to handle the situation due to inexperience or any other reason, then the school management is responsible to immediately bring in an expert counsellor.

**7.3.5. Mandatory reporting: Immediate intimation to the local police station about the incident is also mandatory,** to ensure that suitable arrests can be made as applicable, and details of the offender are added to the records; this essential step alone can prevent repeat offences from the same defaulter, whereas in cases where the defaulter escapes after his abuse and goes scot free, the person most likely surfaces elsewhere and repeats the offences. Delay in reporting and in registration of FIR must therefore be avoided at all costs. Swift punitive action is the best deterrent for such crimes to occur, and all attempts must be made to ensure action is taken against the perpetrator; dismissal from service alone without due intimation to the local police station must never be considered.

**7.3.6. Penalty:** Schools found withholding facts from the parents of how the stage of injury /condition was reached in case of sexual abuse are liable for penal action; apart from penalties applicable to the offender depending on the nature of abuse, as per the relevant law in place.

## 8. SPECIAL ATTENTION FOR CHILDREN WITH SPECIAL NEEDS:

8.1. Children of special needs are at far higher risk of abuse, particularly sexual abuse, because they are seen as soft targets for the following reasons:

8.1.1. They are often not aware that they are victims of abuse because of:

8.1.1.1. a limited sense of danger

8.1.1.2. a limited understanding of sexuality or sexual behaviour

8.1.2. they are also at far higher risk because of a

8.1.2.1. lack of mobility

8.1.2.2. high reliance on adults for many of their needs

8.1.2.3. having a variety of caregivers and care settings

8.1.2.4. need for intimate care such as washing and toileting

8.1.3. if they are aware, they are less likely to report this because of

8.1.3.1. poor communication skills/ limited verbal ability

8.1.3.2. fear of not being believed as they often suffer from poor self-confidence, low self-esteem, feelings of isolation, powerlessness and limited assertiveness.

8.2. Accordingly, **special steps must be taken in case a school has any special needs students. The steps outlined below must also be strictly followed by any school for children with special needs, be it an integrated or exclusive school, including Child Development Centres, standalone Children Clinics, Learning Therapy centres, Play centres, Crèches, Early Intervention Centres, Assisted Living Homes, NGOs run exclusively** for children with special needs in all categories of visual impairment, physical disability, cognitive-learning difficulties, speech impairment, hearing impairment, emotional and behavioural difficulties. These may be run by trained or semi-trained professionals or experts conducting therapy sessions with children for physical/ cognitive/ soft skill development. **Regular schools that may admit students with special needs would also be bound by guidelines of this section.**

### 8.2.1. Infrastructure:

8.2.1.1. Classes/sessions will at all times take place in classrooms that are unlocked.

8.2.1.2. All classrooms and sessions will be observable at all times either through CCTV, viewing windows, or through physical access for observation. CCTV will follow specifications as in 2.3.3, including point, tilt and zoom specified therein.

8.2.1.3. The centre should be open, accessible and well lit.

8.2.1.4. Attention must to give to special infrastructure that may be required, including ramps, railings, toilets for disabled that can accommodate wheelchairs, to minimize inconvenience for those children in wheelchairs or requiring railing support on stairs.

8.2.1.5. There must be a CCTV present at main entry, exit of the centre and covering all corridors of the centre, with specific attention to the corridor leading to the toilets, so that entry and exit to the toilets can be monitored. Most cases of abuse happen in case of a child who is not toilet-trained is taken to the toilet.

8.2.1.6. CCTV will however not be permitted inside the actual toilets so as not to compromise dignity of the child.

**8.2.2. Recruitment of staff:**

- 8.2.2.1. Recruitment and screening of all staff especially when they are working with special needs children, must be done in a stringent manner.
- 8.2.2.2. No candidate with a criminal record of sexual and/or physical violence may be recruited for any position within the institution.
- 8.2.2.3. All selected candidates must provide a signed affidavit to the institution that they have not been accused of offences under POCSO (Protection of Children from Sexual Offences Act 2012), the JJ (Juvenile Justice, Care & Protection of Children) Act 2000 and any other sexual and/or violent crimes under any provision of law that has been in force.
- 8.2.2.4. The affidavit may also contain information pertaining to his/her character and background. In addition, two references (including a character certificate) may be provided by the person at the time of seeking employment.
- 8.2.2.5. Adequate background check of all staff must be carried out.
- 8.2.2.6. In case of support staff/attendants/helpers/ayahs/nurses, police verification must be obtained and kept as part of the records of the institution.
- 8.2.2.7. At the time of being given the appointment letter, all candidates will be presented with a copy of the institution's child protection policy document/code of conduct and will be required to sign it in acceptance, and thereafter sign it once every year on 1<sup>st</sup> January.

**8.2.3. Code of conduct and protocols:**

- 8.2.3.1. A clear Code of Conduct should be laid out for all persons dealing with special needs children, be they special educators, therapists, support staff, helpers, ayahs, etc. This must be explained and enforced. They must be aware of the strict punishments for violating these.
- 8.2.3.2. Depending on the specific needs of the children involved, specific protocols may be developed for easy mobility in consultation with experts and parents of the child.
- 8.2.3.3. The interaction should be conducted in a mutually respectful and transparent manner not compromising the dignity of the child.
- 8.2.3.4. A female attendant must be present during therapy hours, especially when a girl child is undergoing therapy. Additionally, in case of a non-verbal child who is unable to communicate, a caregiver must be present during the therapy session.
- 8.2.3.5. Parents have a right to be present during therapy and this cannot be prevented.
- 8.2.3.6. During such therapy, at no time should doors be locked or children tied.

8.2.3.7. For children who require assistance while using toilets, the minimum assistance required by the child should be clearly specified, along with specific do's and don'ts.

**8.2.4. Training of Staff on protocols:**

8.2.4.1. Periodic sensitization and awareness campaigns/seminars/talks on disabilities and special needs of children must be conducted for the entire school staff including administrative staff, support staff, etc.

8.2.4.2. Some therapy protocols require bodily touch leading to a thin line between good and bad touch. Strict guidelines must be issued to staff, and any therapy which requires bodily touch to private areas must be done only in presence of a parent and a female attendant.

8.2.4.3. Staff will be adequately trained regarding privacy, toileting and related issues. In the event that a child has a toilet accident, no matter how young he/she is, he will be changed in a toilet only. Attendants must be trained to maintain the dignity of the child while strictly following protocols for intimate care; male and female children will be changed separately and not in front of each other, irrespective of age or extent of cognitive ability.

8.2.4.4. It must be clearly communicated in no uncertain terms to special educators that no form of abuse will be tolerated when they are interacting with children, nor should they cross the thin line in handling children by demonstrating any behaviour that is inappropriate. They should be trained to handle strong-willed behavior and made to realize that the child may be facing processing issues and/or not being able to comprehend the educational demand being placed on him/her and that physical punishment will not help him/her learn.

8.2.4.5. No child will be subjected to verbal, emotional or physical abuse such as hitting, pushing, pulling hair, etc.

8.2.4.6. Under exceptional circumstances, a child may be required to be put a room for calming down (isolation); this should however be done only by a trained educator, and shall never exceed 5 minutes; a second responsible adult must always be informed of this.

8.2.4.7. It must be clearly communicated in no uncertain terms to support staff that no form of abuse will be tolerated when they are interacting with children, nor should they cross the thin line in handling children by demonstrating any behaviour that is inappropriate. They are also required to report any incidence of abuse they may see while doing their jobs, including inappropriate touching by older children of vulnerable special-needs children, which must immediately be reported and addressed by the SSC.

8.2.4.8. There must be mandatory training /awareness sessions for teachers/aids/helpers especially sensitizing them about behaviour indicators of traumatized or abused children.

### **8.2.5. Safety skills programme for children:**

- 8.2.5.1. All Schools/Learning/Therapy Centres should develop a personal safety skills programme and personal health education lessons for children with special needs.
- 8.2.5.2. Even though these children may not understand every nuance, they must nevertheless be taught about good touch and bad touch (safe and unsafe touch), and be encouraged to report if they feel uncomfortable at any time.

### **8.2.6. Interface with parents:**

- 8.2.6.1. Parents or authorized caregivers of children with special needs have a right to be present during one-on-one therapy sessions if they deem necessary, and in this respect, would be permitted access as an exception to Section 2.2.4 denying access to parents to premises during school hours.
- 8.2.6.2. A consent from parents must be obtained about the strategies that would be used by the school/centre in case of a meltdown, when the child requires additional techniques. These would be authorized by a trained special educator.
- 8.2.6.3. For children who need to be placed in the therapists lap for occupational or physical therapy, the procedure will be explained to the parent, and the therapist will strictly adhere to protocols.

### **8.2.7. Feedback channels:**

- 8.2.7.1. A constant communication channel with the parents at home is required, so that both sides can report any untoward behavior or resistance from the child in coming to school.
- 8.2.7.2. As with children of regular streams, here too and especially in these children, they must be encouraged to have a buddy/dost within their class who are given the responsibility, on short term rotational basis, of accompanying the special child outside of class for extra activities or who could report to the mentor teacher in case of abuse.
- 8.2.7.3. In addition to the special educators, schools with special children must depute a mentor teacher who would be a trained psychologist, interacting with these children on a weekly basis, over maybe a lunch break, to engage with the child and constantly monitor the emotional health of the child.
- 8.2.7.4. Select teachers, on a short term rotational basis, should be assigned to play an added responsibility of ensuring that these school policies are being maintained.
- 8.2.7.5. All teachers/aids/helpers must be encouraged to report any case of abuse they may suspect, based on behaviour indicators or any other evidence they may have.
- 8.2.7.6. All schools and therapy centres will have SOS number(s) of person(s) to be contacted. These will be displayed prominently in high traffic areas with the wording: IF YOUR CENTRE IS NOT FOLLOWING SAFETY PROTOCOLS, PLEASE CALL CHILD HELPLINE 1098 OR REPORT TO NEAREST POLICE STATION.



8.2.7.7. Nominated or chosen parents should be assigned special tasks on a rotational basis, to make surprise visits to the school and inspect the premises for these policies being implemented.

**8.2.8. Procedure in case of violation/abuse:**

8.2.8.1. In case there is any case of complaint regarding abuse at the Centre with any reported incident, the same must be immediately reported to the nearest police station, irrespective of what other internal procedures may be followed. Delay in reporting and in registration of FIR must be avoided at all costs.

8.2.8.2. Swift punitive action is the best deterrent for such crimes to occur, and all attempts must be made to ensure action is taken against the perpetrator.

8.2.8.3. Dismissal from services alone without due intimation to the local police station must never be considered, as the person has just been given a license to continue his/her misdemeanours elsewhere. Therefore, necessary details must be reported to the nearest police station.

8.2.8.4. Detailed procedures to be followed in case of abuse are as per stated in Sections 7.1, 7.2 and 7.3 which will also apply in cases of Schools for children with Special needs.

**8.2.9. Applicability of other Sections:**

Notwithstanding the fact that there is a special section dedicated to safety of children with special needs, this shall not be interpreted that therefore sections 1 to 7 are not applicable to schools with special children, be they exclusive schools for special needs children or regular schools with some special needs children. It is clarified that provision of all such earlier sections 1 to 7 are also applicable, including specifically the following:

8.2.9.1. the formation of the School Safety Committee as per 6.7 which shall mandatorily have parent representatives who have special needs children

8.2.9.2. the presence of a Complaint box as per 6.4 which shall be monitored by the SSC

8.2.9.3. holding of compulsory Legal Literacy camps for Special needs children and parents as specified in 5.1.9.

8.2.9.4. guaranteed anonymity of informers in cases of abuse/suspected abuse, as stated in Section 6.6, shall also be applicable to informers in special needs schools.

**9. INTERFACE WITH GURGAON POLICE ON SAFETY MATTERS:**

9.1. **Reporting cases of abuse or serious injury:** In the event of any case of abuse or physical injury to a child reported on the school premises, it is mandatory to immediately bring the same to the attention of the local police station, or directly to Gurgaon Police through control room number 100. If not an emergency, email may be sent to [cp.ggn@hry.nic.in](mailto:cp.ggn@hry.nic.in)

9.2. **ANNUAL COMPLIANCE REPORT:**

9.2.1. **It is essential for all schools to send in the Annual compliance report by 1<sup>st</sup> January and 1<sup>st</sup> July every year to Gurgaon Police.**

9.2.2. **The same shall be posted to the District Collector.**

9.2.3. The report shall contain the following information:

- 9.2.3.1. Names and contact numbers of Safety Committee Members
- 9.2.3.2. Dates of meetings of SSC for the 6 month period
- 9.2.3.3. Details of feedback mechanisms in place in the school for reporting abuse as per Section 6.
- 9.2.3.4. Telephone number of school hotline for reporting abuse
- 9.2.3.5. Whether any case of abuse has been reported? (if so, date and action taken)
- 9.2.3.6. Details of training/awareness sessions carried out for staff, for children, for parents, for bus-drivers (date, title, duration of session, person who conducted same).
- 9.2.3.7. Please confirm that your school has on board a Counsellor, Safety Officer, Vigilance Officer as required.
- 9.2.3.8. Please confirm that your school is complying with all safety aspects listed in Section 2.4.4 relating to risk and disaster management
- 9.2.3.9. Please confirm that fire certificate has been obtained and date of validity of same.
- 9.2.3.10. Please confirm measures are in place for police verification of all staff including contract staff, and whether code of conduct duly signed has been obtained by all staff members.
- 9.2.3.11. Please confirm that measures are in place for securing access to premises, with control of entry/exit.
- 9.2.3.12. Please confirm that CCTV has been installed.
- 9.2.3.13. Please confirm that measures for students travelling by bus have been implemented as per Section 4.3
- 9.2.3.14. Please confirm that measures for safety of students travelling other than bus have been implemented as per Section 4.4
- 9.2.3.15. To be signed by Principal along with a parent representative of the School Safety Committee.

9.3. **Securing premises:** An active interface with schools is with regard to securing premises and assessing safety risks. Schools may seek advice of local police station for:

- 9.3.1. visits to advise on specific measures to secure the premises and improve school safety procedures
- 9.3.2. providing checklists for disaster management under Section 2.4.4

## 10. USEFUL CONTACT DETAILS:

Helpline numbers:

Child Helpline 1098

Women's Helpline 1091

Police Control Room 100

Email ids: [cp.ggn@hry.nic.in](mailto:cp.ggn@hry.nic.in), [dcp.eastggn@hry.nic.in](mailto:dcp.eastggn@hry.nic.in)