N.R.IYER MEMORIAL EDUCATION SOCIETY

164, SARAT BOSE ROAD,
KOLKATA 700029

CHILD PROTECTION POLICY

in Accordance with

(Under the Protection of Children from Sexual Offences (POCSO) Act, 2012) and rules framed there under

A SARASWAT & ASSOCIATES
C.P. No.-13568
COMPANY SECRETARIES

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1. Policy Statement

N.R. IYER MEMORIAL EDUCATION SOCIETY (NRIMES) is committed to providing a safe, inclusive, and child-friendly environment where every student is treated with dignity, respect, and care. The school recognizes every child's right to protection from abuse, violence, harassment, exploitation, neglect, and discrimination.

The Child Protection Policy (CPP) aims to:

- Ensure a safe and secure learning environment for every student.
- Protect children from all forms of physical, emotional, and sexual abuse, bullying, harassment, and neglect.
- Establish clear procedures for the prevention, reporting, and redressal of child protection concerns.
- Apply to all School premises, transport, trips, camps, and other School-related activities.
- Be applicable to all staff, teachers, management, volunteers, visitors, parents, and third-party personnel interacting with students.
- Promote a child-centered culture that safeguards the rights, well-being, and holistic development of every child.

This Policy reflects N.R. IYER MEMORIAL EDUCATTION SOCIETY'S commitment to creating a secured environment where every child can learn, grow, and thrive without fear.

2. Scope

This Policy applies to:

- All students enrolled in National High Schools under N.R. IYER MEMORIAL EDUCATION SOCIETY.
- Teaching and non-teaching staff.
- School Management Committee.
- Contractual employees.
- Consultants.
- Volunteers.
- Vendors and service providers.

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- Transport staff.
- Visitors interacting with students during school-related activities.

The Policy covers incidents occurring:

- On school premises.
- During school transport.
- During educational tours, excursions, camps, competitions, and events.
- During online classes and digital communication related to school activities.

3. Definitions

"Child" means any person below the age of eighteen years, in accordance with Section 2(1)(d) of the Protection of Children from Sexual Offences Act, 2012.

"Student" means any person admitted and enrolled in the School, irrespective of age

"Child Abuse" is any deliberate behavior or action which includes all forms of physical, emotional, online and sexual abuse that results in actual or potential harm to the child's health, development or dignity and endangers child safety;

"Cyber Bullying" means any form of intimidation or harassment, using a computer, communication device or computer network or the Internet;

"Mental Harassment" means and includes insults, ridicule, humiliation, name-calling and repeated threats to cause physical violence to a child;

"Penal Offence" means any offence that is punishable under the law with corporal punishment and/or fine, such as offences defined and punishable under the Bhartiya Nyaya Sanhita (BNS), 2023 and/or POCSO Act, 2012 and/or the Juvenile Justice Act or any other law in force on the date of the incident;

"Physical Violence" means any act or conduct which is of such a nature so as to cause bodily pain, harm, or danger to life, limb, or health or impair the health or development of the child;

"Bullying" or **"Ragging"** means any disorderly conduct whether by words spoken or written or by an act which has the effect of teasing, treating or handling with rudeness any other student, indulging in rowdy or undisciplined activities which causes or is likely to cause annoyance, hardship or psychological harm or to raise fear or apprehension thereof in a fresher or a junior student or asking the students to do any act or perform something which such student will not do in the ordinary course and which has the effect of causing or generating a sense of shame or embarrassment so as to adversely affect the physique or psyche of a fresher or a junior student.

"Sexual Assault" has the same meaning as assigned to it in Section 7 of POCSO Act, 2012;

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"Sexual Harassment" has the same meaning as assigned to it in Section 11 of POCSO Act, 2012;

"Stalking" means following a child and contacting or attempting to contact such child to foster personal interaction repeatedly despite a clear indication of disinterest by such child; or monitoring the child by internet, email or any other form of electronic communication.

Exploitation: It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child.

4. OFFENCES AND OTHER ACTS COVERED UNDER THIS CPP

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

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

5. Instructions for parents, local guardians and visitors for child protection

- Parents and local guardians shall actively cooperate with the school in implementing the Child Protection Policy and promoting the safety and well-being of students.
- Parents/guardians shall promptly update the school regarding any changes in contact details, emergency information, or any significant physical, mental, or emotional health concerns of the child.
- Parents/guardians are encouraged to attend Parent-Teacher Meetings (PTMs) regularly and maintain effective communication with class teachers regarding their child's welfare, safety, and academic progress.
- Visitors, vendors, contractors, delivery personnel, housekeeping staff, gardeners, plumbers, and all other persons entering the school premises shall comply with the school's child safety and security protocols.
- Such individuals shall not interact with students or access student areas unless authorized by the school and only for legitimate official purposes.
- Every individual present on the school premises is expected to contribute to maintain a safe, secured, and child-friendly environment for all students.

6. Instructions for students to implement this policy

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- Every student should feel comfortable reporting to teacher(s) / counsellors/ School Principal / Vice Principal, Child Protection Officer about any untoward incidents involving themselves and other students or staff that may put their or their fellow mates' safety at stake.
- Every student must follow the dress code of the School.
- Every student must obey school-safety rules, in particular the instructions from staff in the event of a natural calamity or outbreak of fire.
- Every student should make use of the equipment and procedures provided for their safety purposes.

7. Roles & Responsibilities of POCSO team at National High Schools

The Principal, and the program coordinators are responsible for implementing this policy within the school by monitoring the effectiveness of its implementation, the safe working practices described within it, revising and amending related procedures regularly. Apart from this, trained personnel are assigned to conduct demonstrations to children about how to respond to an emergency evacuation situation and inform the members of the school community about relevant safety procedures. The ultimate accountabilities are with the Principal of the school and the POCSO committee to ensure that the child safety policy is strictly implemented and is available to all staff members, contractors, vendors, volunteers and parents. Therefore, the Principal of the school must:

1. formulate appropriate procedures to meet the safety of the child as required and relevant to the school atmosphere,
2. support with relevant legislative requirements and responsibilities to ensure that all staff and contract workers are aware of the safety check as to the standard specified in POCSO Act 2012,
3. to make sure that this policy document is available on the school's website or is available on request to the parents or legal guardian,
4. ensure the interests and protection of the children are paramount in all circumstances,
5. recognize the rights of the family to participate in the decision-making about their children,
6. support all staff members to work by this policy, to work with partner agencies and organisations to ensure child protection policies are understood and implemented,
7. promote a culture where staff feel confident, where they can constructively challenge poor practices or raise issues of concern without fear of reprisal,
8. consult, discuss and share relevant information, in line with School's commitment to confidentiality and information-sharing protocols, in a timely way regarding any concerns about an individual child with POCSO committee or designated person(s),
9. seek advice, when necessary, from advisors on employment matters and other relevant agencies where child safety issues arise,
10. make available professional development, resources and/or sufficient advice to ensure all staff members can carry out their roles in terms of this policy,
11. to make sure that this policy forms a part of the initial staff induction programme for each staff member.

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8. Procedure for Approaching the committee for grievances

The committee deals with issues relating to all forms of child abuse at the National High Schools. Any complaint under para 4 hereinabove may be lodged by the victim or a third party. A written complaint may be addressed to the Chairperson of the Committee in his/her mail. If the complaint is made to any of the Committee members, they may forward it to the Chairman of the Committee.

9. Complaint of an Offense

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

a) any teacher

b) Counselor

c) School Principal/Vice Principal

d) Child Protection Officer

(ii)In the event the complaint constitutes an offence under POCSO Act (The Protection of Children from Sexual Offences Act, 2012), the same shall be forwarded to the POCSO Committee and the procedures as established by that Committee shall be followed.

(iii)With respect to offenses under POCSO, the School is duty bound to report the offense to the concerned law enforcement agencies in terms of Section 19 and Section 21 of the Act.

(iv)Where the complaining student and/or parent(s) of such student, is of the view that the complaint constitutes a penal offense and should be forwarded to the concerned law enforcement agency, the School shall forward the same to the concerned law enforcement agency.

(v)The School will cooperate with the concerned law enforcement agencies inquiring into and/or investigating complaints of penal offense(s).

(vi)In the event the complaint does not fall within sub-clause (ii) and (iv) above, the complaint shall be dealt with by the POCSO committee and procedures as established by the POCSO Committee shall be followed.

(vii)If a person has knowledge that an offense has been committed or apprehension that an offense is likely to be committed must report to Child Protection Officer of POCSO Committee or any senior member of the School.

10. Complaint Redressal Mechanism for Child Sexual Abuse Cases

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Such persons mentioned in 9(vii) should not conduct their own investigation or look into the matter. There should not be any delay in reporting the matter to POCSO Committee or any senior member of the School.

The POCSO Committee must hold a meeting and immediately report the matter to the local police/ Special juvenile police unit/ Child helpline (1098)/ State commission for protection of child rights.

Minutes of the meeting should be maintained and signed by all the members. A copy of the same should be shared with the authorities.

When the matter is closed or withdrawn for any reason whatsoever, the School must prepare a post incident report/ closure report.

11. Code of Conduct

All staff members, external personnel and visitors shall follow the prescribed Code of Conduct to safeguard the child from any incidence of abuse. In the event, a legislation or subordinate legislation prescribes any code of conduct for school staff, the school shall abide by the same in addition to the code provided below.

Code of Conduct for the Staff

1. Be conscious of and respect the privacy and dignity of each and every child.
2. Be visible and not in a secluded place, while in contact with children at the workplace.
3. Respect and encourage children's voice and views.
4. Educate children about their rights, issues of abuse, neglect and exploitation.
5. Be affectionate, caring and understanding to the requirements and needs of the children.
6. Be responsive in case any special need of the child arises such as health issues or emotional support.
7. Have a sense of accountability, in order to deter any poor practice or potentially abusive behaviour.
8. Immediately report any suspicious behaviour/suspected occurrence of abuse. It is a criminal offence to conceal or abet incidents of child abuse, and is mandatory to report such offences.
9. Treat children with respect regardless of race, colour, gender, language, religion, nationality, ethnicity, disability or other status.
10. Comply with all relevant Indian and State legislation, including all child related laws.

It is NOT appropriate for staff to

1. Spend excessive time alone with children away from others.
2. Physically assault or physically abuse the child.
3. Use language that is discriminatory, abusive or hurtful to the child.

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4. Develop relationships with the child that could in any way be deemed exploitative or abusive.
5. Store obscene/pornographic material (photographs, video clips) on their mobile phones and showing to children.
6. Browse, publish or transmit material in any form which depicts children engaged in sexually explicit act or conduct.
7. Create text or digital images and/or collects, seeks, browses, downloads, advertises, promotes, exchanges or distributes material in any electronic form depicting children in obscene or indecent or sexually explicit manner.
8. Show or talk of content that is sexual in nature or take photographs of children.
9. Behave physically in a manner which is inappropriate or sexually provocative.
10. Condone and/or participate in behaviour of children which is illegal, unsafe or abusive.
11. Use physical punishment on children.
12. Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.
13. Stigmatize or humiliate a child.
14. Act in a manner that puts the child at risk.
15. Engage in any sort of physical contact with a child that may make the child or an observer feel uncomfortable, or that may be seen by an observer to be violating boundaries.
16. Engage in any communication with a child within or outside of school duties, that may make the child uncomfortable or that may be seen by an observer to be violating boundaries.
17. Conduct their own investigation into allegations or suspicions of potentially illegal or inappropriate behaviour – it is an employee's duty to report the matter to his/her Principals/Child Protection Officer.
18. It is important to note that whether or not a particular behaviour or action constitutes inappropriate behaviour will be a matter determined by the organization having regard to all of the circumstances, including past behaviour, and allegations or suspicions related to such behaviour.
19. Every complaint regarding inappropriate behaviour or communication with a child, shall be taken cognizance of by the management of the School. However, whether or not a particular behaviour or action constitutes inappropriate conduct, or is in contravention of the aforesaid Code of Conduct or this CPP, will be a matter determined by the management of the School, having regard to the relevant facts and circumstances. The findings and decision of the management of the School shall be final.

12. Prevention of Ragging and Bullying

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

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the School and that such complaints shall be promptly dealt with while protecting the complainants from any harassment by the perpetrators of ragging.

The Principal and other senior members of the School staff should conduct meetings of teachers, parent(s) and students collectively or in groups, on bi-annual basis, to spread awareness that ragging is a reprehensible act.

13. Safety Guidelines for Online Learning

Guidelines for Teachers

1. Continue to abide by the recommendations and guidelines as outlined in CPP.
2. In case of suspected or observed child abuse of any kind, follow the reporting process outlined in CPP and inform the Child Protection Officer.
3. Proactively check on the wellbeing of the students.
4. Maintain communication channels on appropriate platforms; do not interact with students over Facebook, Instagram, Snapchat, or any other social media platform.
5. Ensure that your broadcasting location, clothing, surrounding environment, language, behavior, and body language is professional, appropriate, and culturally sensitive.
6. Use your full name as a display name in virtual spaces that you interact with students; do not use abbreviations, nicknames or characters that resemble alphabets.
7. Set up norms with your students about what can be shared in the group, and appropriate timings to do so.
8. Avoid sharing personal details, contact information, and details of your day-to-day life unless in the context of a learning session.
9. Check that the online learning platform you are using is secure and whether you have control over any intrusions, screen sharing or unwanted attendees.
10. Advise your students to engage in the learning session from a common space within earshot of parents/guardians wherever possible or in a space known to parents/guardians.
11. Engage with parents/guardians by sharing a digital learning plan and schedule to inform them of times of interaction.
12. Ensure that the content you are creating, using, or sharing is age-appropriate and culturally sensitive.
13. Do not share student work/data/opinions or images/videos from online learning sessions without taking consent from the student(s) involved.

Guidelines for Students

1. Students must use their full name and an appropriate profile picture on any platform when interacting with other students and teachers.
2. Students must not share personal information about themselves or anyone else on any platforms.

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3. Students must not share images, videos or audio clips with personal or inappropriate content of themselves or anyone else.
4. Students must inform their parents/guardians about any and all online sessions and interactions.

14.Improper Complaints

This policy shall not be used to bring frivolous or malicious complaints against students or employees. A person who brings up a complaint that is later found to be frivolous or malicious will be subject to disciplinary action.

Penalties:

- Step 1 - a first warning will be given to the accused not to repeat such action via mail/letter
- Step 2 - a second warning will be a period of suspension from the school.
- Step 3 - third and final will be dismissal from the school.
- Penalties will be determined based on the facts of each case and the extent of harm to the Institution's interests, as well as any record indicating previous wrong doing by the accused person.

15. Confidentiality

The information generated in the course of informal reviews and formal investigations necessary to enforce this policy will be given the full extent of confidentiality accorded by law to employee personnel records and student educational records. Any person who, without authorization, reveals such information will be subject to disciplinary action. In any case, when a complaint is being mediated or investigated, the person accused will be informed of the specific details of the complaint, as well as the prohibition against retaliation.

16. Prevention Measures

To promote a safe, secure, and child-friendly environment, the school shall:

- **Conduct regular POCSO awareness programs** for students, parents, and employees to promote awareness of child rights, personal safety, and reporting mechanisms.
- **Organize age-appropriate child safety sessions** on topics such as personal boundaries, safe and unsafe touch, cyber safety, and responsible online behavior.
- **Provide annual training** to all teaching, non-teaching, contractual, and support staff on the provisions of the POCSO Act, child protection practices, and the school's reporting procedures.

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- **Display child safety information** and details of the reporting mechanism at prominent locations within the school premises.
- **Install and maintain CCTV cameras** in common areas, entrances, corridors, and other appropriate locations, while ensuring that cameras are **not installed in washrooms, changing rooms, or any area where privacy is expected**.
- **Maintain a visitor management system**, including visitor registration, identification, and controlled access to student areas.
- **Conduct background verification and, wherever applicable, police verification** of employees and other personnel who may interact with students, in accordance with applicable laws and School policy.
- **Review and strengthen child protection measures periodically** to ensure continued compliance with applicable legal requirements and best practices.

17. Responsibilities of Teachers and Staff

All teachers, employees, and other personnel interacting with students shall:

- Use only **official and School-approved communication platforms** for academic and school-related interactions.
- Avoid personal communication with students through personal email accounts, social media platforms, or messaging applications, except where specifically authorized by the school and with appropriate transparency.
- Conduct online classes, meetings, and virtual interactions in a professional, respectful, and appropriate manner.
- Maintain appropriate digital behavior and uphold the same standards of conduct online as are expected within the school premises.
- Refrain from sharing inappropriate, offensive, or sexually explicit content, or engaging in any communication that may compromise the safety, dignity, or privacy of a student.
- Respect the privacy of students and ensure that any recording, photograph, or screenshot of online classes or activities is taken only with the school's authorization and for legitimate educational purposes.

18. Student Awareness

The school shall conduct regular awareness programmes to educate students on:

- Cyber safety and responsible digital behaviour.
- Recognizing and reporting online grooming and cyber abuse.

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- Protecting personal information and maintaining online privacy.
- Safe and responsible use of the internet, social media, and digital communication platforms.
- Identifying online risks, including cyberbullying, phishing, identity theft, and inappropriate online content.
- Reporting any online behaviour or communication that makes them feel unsafe or uncomfortable.

The school shall periodically review its digital safety practices and encourage responsible use of technology by students, employees, and parents to foster a secure online learning environment.

19. Record Keeping

The school shall maintain accurate, complete, and confidential records relating to all matters concerning child protection and compliance with the Protection of Children from Sexual Offences (POCSO) Act, 2012. All records shall be maintained securely with restricted access and shall be handled in a manner that safeguards the privacy and confidentiality of the child and other concerned persons.

The school shall maintain, wherever applicable, records including but not limited to:

- Complaints and concerns received relating to child protection.
- Incident reports and complaint documentation.
- Actions taken by the school in response to complaints.
- Reports made to the appropriate authorities under the POCSO Act or other applicable laws.
- Minutes and records of meetings of the Child Protection Committee.
- Awareness programmes, workshops, and child safety initiatives conducted for students, parents, and employees.
- Training records of teaching, non-teaching, contractual, and support staff.
- Employee background verification and police verification records, wherever applicable.
- Any correspondence, documents, or records relating to the handling and resolution of complaints.

The school shall ensure that:

- All records are maintained securely with appropriate physical and electronic safeguards.
- Access to such records is restricted to authorised personnel on a need-to-know basis or as required by law.

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- Records are preserved in accordance with applicable laws, regulatory requirements, and the School's Record Retention Policy.
- Confidential information is not disclosed except where required or permitted under applicable law.

20. Policy Review

This Child Safety and Protection (POCSO) Policy shall be reviewed at least once every year to ensure its continued effectiveness and compliance with the Protection of Children from Sexual Offences (POCSO) Act, 2012, other applicable laws, and regulatory guidelines.

The Policy may also be reviewed and updated earlier, whenever required, due to changes in applicable laws, directions issued by competent authorities, or changes in the School's operational or child protection requirements. Any revisions shall be approved by the POCSO Committee & Governing Body of the School and communicated to all relevant stakeholders

21. Members of The Committee

COMPLIANCE COMMITTEE UNDER PROTECTION OF CHILDREN FROM SEXUAL OFFENCES (POCSO) ACT 2012	
Name	**Designation**
DR. V.V. LAKSHMINARAYANAN	CHAIRMAN OF THE COMMITTEE
Sri. M. Viswanathan	President, NRIMES
Sri. K. R. Sriram	Hony. Secretary, NRIMES
Smt. Padma Roy Bardhan	Vice President, NRIMES
Sri. T.K. Radhakrishnan	Asst. Secretary, NRIMES
Smt. Shriya Chakraborty	Principal, Secondary/Senior Secondary
Smt. Anupama Ajitsaria	Principal, Junior/ Middle School
Smt. Sarbani Ghosh	Principal, Secondary/Hr. Secondary-NHS SBC
Smt. Tanusree Guha	Principal, Primary/Middle Section- NHS SBC
Sri. Sunil Pandey	Vice-Principal, Senior Secondary, NHS-HRC
Smt. Magdaline Vanjour	Vice-Principal, Primary, HRC
Smt. Priya Chatterjee	Parent of Primary Student NHS-HRC
Smt. Dr. Radha L. Narayanan	Paediatrician
Smt. Chitra Bhaskar	Academician

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22. Helpline Contacts:

POCSO Email: helpline.pocso@nhsedu.com

POCSO Phone No.: 1800-345-8921 – NATIONAL HIGH SCHOOL-WBB CAMPUS

1800-345-7925 – NATIONAL HIGH SCHOOL-CBSE CAMPUS

23. Declaration

All employees shall acknowledge that they have read, understood, and agree to comply with this POCSO Policy.

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