

This document is a guide for principles, policies, and procedures related to child safety. It is a work in progress. Please study the document carefully and apply the policies thoughtfully. These policies and procedures will be reviewed each year by the leadership team with input and feedback from all staff. This version was updated on **15 July 2021**.

Mission statement

Focus High School is a community of lifelong learners that aims to enable children to excel in all aspects of life.

The school provides for students' holistic development: encouraging them to be critical and creative thinkers; guiding them to be principled and compassionate; training them for physical health; and preparing them for higher studies and work.

Convinced that education is a means of establishing justice and mercy in the world, Focus High School ensures that its programmes are accessible to all.

Core values

Lifelong learning: all members of our school community seek to improve, learn, and grow throughout their lives

Holistic education: we strive for the integrated development of children's intellectual, emotional, social, spiritual, and physical aspects of life

Social constructivism: learning is a process of "constructing, testing and revising mental models of how the world works and it is this process that enables each student to make meaning of their lives and the world around them" (IBO, 2008)

Common, inclusive schooling: the school serves male & female children of varied communities, economic backgrounds, and academic abilities

Creative professionalism: leadership in the school is distributed and devolved, relying on the active collaboration of creative and reflective teachers

Scope

Focus High School Child Safety Policy is a guide for various aspects, mechanisms and procedures of child safety. The aim of this policy is to dictate the behaviour and attitude of all Focus High School Stakeholders towards children; to protect them from actual or potential harm, abuse or neglect. It also provides the mechanism and procedure for reporting and redressal of child abuse.

Aims

This policy has been created to provide a safe, secure, inclusive, nurturing and holistic environment for all the school children. In particular,

1. To provide relevant information collated from various existing guidelines on the Safety and Security of Children in School.
2. To inform and equip relevant stakeholders in monitoring the measures of school safety and security, so as to ensure the Safe and Secure environment for the children in school.
3. To facilitate awareness generation and building capacities of relevant stakeholders i.e. school management, teachers, staff and other personnel and students on safety and security of children in school.
4. To highlight the roles and responsibilities of teachers and other school staff of the school ensuring safety.

Definitions

Child

Any person until he or she reaches her 18th birthday is considered to be a child in the eyes of laws of the Indian government and International organisations.

Stakeholders

All Focus High School Staff members, parents, students, guests and visitors under the premises of the school or associated with the organisation.

Child Abuse

Child abuse can happen in different forms and through different sources. In general, it constitutes physical, mental, emotional ill treatment, sexual abuse of any form, neglect or negligence and commercial exploitation of children, resulting in an actual or potential harm to the child's health, survival, development or dignity. Below are some forms of major child abuses:

1. **Physical abuse:** It includes any corporal punishment in the form of hitting, beating, punching, burning and suffocating or any other physical harm, detrimental to child's safety and well being.
2. **Mental/Emotional abuse:** This involves persistent emotional ill treatment of the child to such an extent so as to cause long lasting psychological effects on the child's emotional or mental development. It includes conveying to the child that they are worthless, unloved, inadequate, incompetent or not valued. It also involves unrealistic and inappropriate expectations that do not meet a child's inherent abilities.
3. **Neglect/Negligence:** This involves persistent failure to meet a child's basic emotional, psychological and physical needs, which are likely to have detrimental effects on the general development, growth and well being of the child.
4. **Sexual abuse:** This involves any inappropriate physical contact, attitude, gesture or approach towards a child. It also includes, forcing, promoting or enticing a child to take part in sexual activity, either physically or through telephone, social media, online audio/video calling apps, online chat rooms, digital games, with or without their consent. It also constitutes

conducting, promoting or taking part in commercial sexual exploitation and trafficking of children. Holding, sharing, showing and storing of child pornography or any such material is an offence punishable by Indian Penal Code.

Measures to prevent Child Abuse

Onboarding all Focus High School Stakeholders:

1. All Focus High School staff members/job aspirants are required to declare previous cases of criminal offence and mistreatment to the children as part of their job application and joining process.
2. All Focus High School staff members are required to complete child safety and protection training mandatorily and clear the end of the course assessment.
3. All Focus High School staff members are required to sign a declaration of completing the child safety policy.
4. All Focus High School staff members are required to undergo training on [POCSO Act, 2012](#).

Partnerships to support implementation where possible:

1. Partnering with organisations to conduct age-appropriate sessions on personal safety of Students, Good touch Bad touch sessions, road safety, health and hygiene sessions. In this regard, we have signed an MOU with the [Young Indians](#) group.
2. Partnering with counsellors for providing preventive and counselling support for Students and staff members. We use the services of [Roshni counseling center](#) in this regard.
3. Partnering with organisations working in the area of child abuse and child rights, to support the stakeholders in effective implementation of the CPP.

Redressal Mechanisms:

Assigning responsibility to specific individuals or groups of individuals within the organisation to ensure procedures and arrangements are in place for effective implementation of the policy and redressal of Child abuse complaints. These include:

1. **Child Protection Committee (CPC):** This is a committee to help the Child Protection Officer (CPO) with redressal decisions and will conduct reviews (once every 2 months) of the working of the Child Safety Policy and implement any additional measures to strengthen child protection measures.
2. **Chairperson (CP):** This is by default the Vice Principal of each campus of Focus Schools. List of names and contact details are provided in the Annexure-1.
3. **Child Protection Officer (CPO):** This is the person in every campus to ensure compliance to the Child Safety Policy. By default, the CPO are school counsellors at each branch. List of names and contact details of the CPO is provided in Annexure-1.

The Child Protection Committee will:

1. Focus only on the complaints/suggestions received on child safety violations/abuse and not on any administrative issues.
2. Discuss the concerns, record the same and give appropriate recommendations to the organisation's management for further action.
3. Ensure the concerns are addressed and closed within a specified time.
4. Maintain all registers, files, folders and documents related to child safety and protection.
5. Seek external expert help as and when required.
6. Convene as soon as an incident is reported with periodic follow-up until closure of case.

7. Cooperate with the police, judiciary and local administration in investigation of the reported incident, to the extent applicable by law, while keeping in mind the safety, security, right to privacy and confidentiality in the best interest of the child.
8. Assess and address the impact of the incident on other children, adults working there and on the organisation as a whole.

The Child Protection Officer will:

1. Assist the Chairperson during case proceedings.
2. Receive all complaints of child safety violation including child abuse, whether verbal or written and ensure confidentiality and record it in a register.
3. Maintain case files and records pertaining to the complaints/incident.
4. Follow mandatory reporting in case of safety violation including child abuse wherever legally mandated and coordinate with the police/ NGO/ local authorities and ensure that there is no attempt to cover up the incident, or influence the child's parents/guardian or other authorities.
5. Follow procedures where there are allegations of child safety violations or child abuse including against the Head of the institution/Chairperson of CPC.

Responsibilities of all Stakeholders:

All employees at Focus High School are required to:

1. Be aware of situations which may present risks and appropriately manage them.
2. Plan and organise the work and the workplace so as to minimise risks.
3. Be visible to others when working with children whenever possible.
4. Create and maintain a non-defensive attitude and an open culture to discuss any issues or concerns.
5. Foster a culture of mutual accountability so that any potentially abusive behaviour can be challenged.
6. Develop a culture where children can talk about their contacts with staff and others openly.
7. Respect each child's boundaries and help them to develop their own sense of their rights as well as helping them to know what they can do if they feel that there is a problem.

Behaviour to be avoided by all stakeholders:

1. Spend excessive time alone with children away from others.
2. Take children to your own home, especially where they will be alone with you.
3. Have a child or children to stay overnight at your home unsupervised.
4. Sleep in the same room or bed as a child.
5. Hit or otherwise physically assault or physically abuse children.
6. Behave physically in a manner which is inappropriate or sexually provocative towards a child or develop physical/sexual relationships with children.
7. Develop relationships with children which could in any way be deemed exploitative or abusive.
8. Act in ways that may be abusive or may place a child at risk of abuse that includes intentionally humiliating, belittling, degrading, holding, kissing, cuddling, touching a child in an inappropriate, unnecessary or culturally insensitive way.
9. Use language, make suggestions or offer advice which is inappropriate, offensive or abusive.
10. Condone, or participate in, behaviour towards children which is illegal, unsafe or abusive or exposes the child to danger.
11. Discriminate against, show different treatment, or favour particular children to the exclusion of others.

Reporting

It is expected and anticipated that the failsafe, rigorous and aggressive measures set in place for Child Safety will prevent any actual abuse, harm or neglect happening at Focus High School. However, to ensure that such incidents if occurred are handled properly and effectively, a reporting mechanism has been created:

Reporting and Redressal of Child Abuse Complaints:

There are 3 scenarios under which the Child Protection Policy can be violated. The guidelines set out in this section will govern the reporting and redressal of each of the respective scenarios:

1. Where the alleged victim is any child and the alleged offender is a Staff member.
2. Where the alleged victim is a Focus High School student and the alleged offender is not a Staff member.
3. Where the alleged victim can be any child and the alleged offender is anybody and where the offence is one of sexual abuse.

Guidelines for Complaint Redressal Mechanism

Scenario 1: Where the alleged victim is any child and the alleged offender is a Staff member.

Under Scenario 1, once the CPO receives a complaint, he/she will categorise the offence into one of the two categories:

- 1. Category-1 offence could have any or all of the elements mentioned below:**
 - 1.1. Corporal punishment of a Child: Smacking.
 - 1.2. Use language or behaviour towards Children that is inappropriate, harassing, abusive, demeaning, intimidating, offensive, discriminatory or culturally insensitive.
 - 1.3. Discrimination or other offences against a Child with disabilities.
 - 1.4. Discrimination of any kind against a child (eg: race, gender, ethnicity, minority).
 - 1.5. Punishment in the form of humiliation: Duck-walking, touching toes, removal of shirts, made to hold ears in or outside of class.
 - 1.6. Ignoring a child in the class.
 - 1.7. Sarcasm and disrespectful or abusive language with a child.
 - 1.8. Humiliating in the form of comparison (eg: taunting a child for struggling in class or publicly labelling him/her as a lower order child).
- 2. Steps to be taken for Category-1 offence:**
 - 2.1. The complaint is registered with the CPO.
 - 2.2. CPO will inform the Chairperson.
 - 2.3. The Chairperson will take necessary steps to change the behaviour.
 - 2.4. Consequences range from, but are not limited to, awareness-building, conversations with the Chairperson/staff member, counselling under a formal support plan. If there is a violation of the support plan, this may result in a formal warning letter. If the violation is repeated, this could result in termination. Staff members exiting for a Child Safety Policy violation, cannot reapply for the job for a minimum of two years from their exit.
 - 2.5. If the consequence suggested involves a formal support plan or a warning letter or termination, the Chairperson will take the approval of the CPO to do this.
 - 2.6. On closure of the case (change or stopping of behaviour), the Chairperson will close the case formally with the staff member and the CPO via email copying his/her supervisor.
- 3. Category-2 offence could have any or all of the elements mentioned below:**
 - 3.1. Corporal punishment of a Child: Severe or repeated beating.
 - 3.2. Illegal adoption of a Child or facilitating or promoting such adoption.
 - 3.3. Employing or using a Child for begging.

- 3.4. Giving a Child intoxicating liquor, narcotic drugs, tobacco products or psychotropic substances or using a Child for vending, peddling, carrying, supplying or smuggling such liquor, drugs or substances.
- 3.5. Abandoning a child under your care or neglecting a Child or committing other forms of cruelty towards a Child.
- 3.6. Employing a Child below fourteen years of age in any occupation or employing a Child between fourteen and eighteen years of age in any hazardous occupation.
- 3.7. Marrying a Child or promoting or solemnizing a Child marriage.
- 3.8. Use of a Child by militant groups.
- 3.9. Assaulting, Kidnapping, abduction, trafficking, murder, sale and procurement for any purpose, abetment of suicide of a Child and other offences affecting the body of a Child.
- 3.10. Producing, publishing or transmitting sexually explicit material in relation to a Child electronically, facilitating online abuse of a Child or other Child-related cybercrimes.
- 3.11. Sexual assault/abuse of children.

4. Steps to be taken for Category-2 offence:

- 4.1. The complaint is registered with the CPO
- 4.2. CPO will talk to the Staff member keeping the Chairperson in the loop.
- 4.3. Consequences may include formal reporting under the respective laws.
- 4.4. These actions constitute gross misconduct and will most likely lead to termination but may involve a formal letter and counselling depending on the context.
- 4.5. The CPO may choose to bring in an external partner to handle the case, and must keep the Chairperson in loop.
- 4.6. On closure of the case (change or stopping of behaviour), the Chairperson will close the case formally with the CPO via email copying his/her supervisor.

Scenario 2: Where the alleged victim is a Focus High School student and the alleged offender is not an Organisation Representative.

In these cases, Focus High School does not have formal jurisdiction against the offender and the case falls outside the scope of our policy. However, *Focus High School* will take necessary steps, after considering possible retaliation against the child, to report the case as well as, where possible, to ensure the child is safe. *Focus High School* will approach any such case keeping the safety and wellbeing of the child paramount, and take necessary steps in collaboration with experts and partner organisations.

Reporting of Child abuse:

1. The complainant will report this case to the CPO.
2. The CPO may take the following next steps:
 - a. Send the Child abuse complaint to the CPC in the school keeping the complainant and his/her supervisor in the loop. However, in case any of the School authorities mentioned is the alleged offender, the Complainant, after ascertaining the level of risk to the alleged victim, uses his/her discretion in providing information about the Incident to such School authority.
 - b. May work directly with the Student or Staff member to report the complaint directly to Childline or the relevant government/legal redressal committee.
3. CPO will advise on steps to protect the alleged victim from further harm and provide medical or counselling assistance as necessary and where possible. These may include contacting CHILDLINE 1098, the police or the Child Welfare Committee.
4. The CPO may advise the Staff members of steps that the child can take to stay safe (for example, always being with a trusted adult) and also how to create a safe space for the child to speak, without judgement, about his/her situation.
5. The CPO may advise the Staff member to inform the parents/guardians of the alleged victim about the Incident or ensure that the CPC in the School, or the headmaster/principal of the School does the same. However, in case a parent/guardian of the alleged victim is the

alleged offender, the CPO, after ascertaining the level of risk to the alleged victim, uses his/her discretion in providing information about the Incident to such parent/guardian.

Scenario 3: Where the alleged offender can be anybody and the victim is any child and where the offence is one of sexual abuse

Reporting of Child abuse:

1. The Complainant shall send the Child abuse complaint to the CPO within 48 hours, through the online form, or by email.
2. Steps to be taken by the CPO after the receipt of the Child Sexual abuse complaint: The CPO shall seek internal and external support, as may be necessary, to undertake the following tasks:
 - 2.1. The CPO shall inform the Chairperson of the Child Sexual abuse complaint before the close of the day on which the complaint has been reported to the CPO.
 - 2.2. The CPO will engage the designated child rights partner organisation to support the alleged complainant and alleged victim in reporting and redressal of the incident.
 - 2.3. The CPO will advise the incident to CHILDLINE 1098, the police, the Special Juvenile Police Unit or the Child Welfare Committee, as the case may be.
 - 2.4. If the alleged offender is an Organisation representative and is convicted of the offence, the Chairperson shall terminate the services of or terminate the association with the offender, as the case may be.
 - 2.5. The CPO shall ensure confidentiality of the Incident (including the identity of the Complainant, the alleged victim and the alleged offender, the contents of the Child abuse complaint and the proceedings of the Child abuse complaint) and disclose the Incident only to persons who need to know about the Incident.
 - 2.6. The CPO shall ensure proper documentation and recording of the Child abuse complaint.
 - 2.7. As per section 19 of the POCSO Act, every person who suspects or has knowledge of the commission of a sexual offence is required to report the offence to the local police or the Special Juvenile Police Unit. A failure to report the sexual offence, constitutes an offence punishable with imprisonment or fine or both in accordance with section 21 of the POCSO Act. Making false complaints or providing false information against any person in respect of a sexual offence under the POCSO Act is also punishable with imprisonment or fine or both under section 22 of the POCSO Act.

ANNEXURE-1. CONTACT DETAILS OF THE CHILD PROTECTION COMMITTEE

Darushifa Campus			
Role in CPC	Designation	Name of person	Contact
Chairperson	Vice Principal (CD)	Syed Mustafa Hussain	P: 92465 89588 E: mustafa.zaidi@focushighschool.org
CPO	Counsellor	Syed Murthuza Hussaini	P: 94901 63148 E: murthuza.hussaini@focushighschool.org
Member	Teacher	Vaseema Sultana	P: 96186 69651 E: vaseema.sultana@focushighschool.org

Noor Khan Bazar Campus			
Role in CPC	Designation	Name of person	Contact
Chairperson	Vice Principal (CD)	Sheherbano o Fathi	P: 93948 03343 E: sheherbanoo.fathi@focushighschool.org
CPO	Counsellor	Mumtaz Samnani	P: 92904 48469 E: mumtaz.samnani@focushighschool.org
Member	Teacher	Neeta Mishra	P: 70135058222 E: neeta.mishara@focushighschool.org

Purani Haveli Campus			
Role in CPC	Designation	Name of person	Contact
Chairperson	Vice Principal (CD)	Asma Zaidi	P: 73866 66713 E: asma.zaidi@focushighschool.org
		Humayun Abedy	P: 9985752455 E: humayun.abedi@focushighschool.org
CPO	Counsellor	Shazia Siddiqui	P: 99638 81583 E: shazia.siddiqui@focushighschool.org
Member	Teacher	Afshan Begum	P: 9550611532 E: afshan.begum@focushighschool.org

ANNEXURE-2. REPORTING CHILD ABUSE COMPLAINT FORM:

All complaints should be made on Focus High School's online Child Safety Violation Complaint Form to ensure documentation, through the following link:

[Child Safety Violation Complaint Form \(to be made\).](#)

In case the online form is not accessible or not working, please mail the following details to the respective CPO (refer to Annexure X -for contact information):

1. Details of the Complainant

- a. Name:
- b. Phone number:
- c. Email ID:
- d. I am (Please select one): A Focus High School Teacher, An Admin staff, a Volunteer/Intern, A Student, Not related to Focus High School.
- e. Place of work:
- f. Nature of the Complainant's association or relationship with the alleged victim:

2. Details of the alleged victim(s)

- a. Name:
- b. Gender:
- c. Age:
- d. City:
- e. Educational Institute:
- f. Class/Grade:
- g. Names of the parents/guardians of the alleged victim:
- h. Address of the parents/guardians of the alleged victim:
- i. Phone numbers of the parents/guardians of the alleged victim:

3. Details of the Incident

- a. Nature of the Incident (Please select one): Staff to Students, Student to Student, Non staff Adult to Students.
- b. Description of the Incident:
- c. Frequency of the Incident:
- d. Date of the Incident:
- e. Location of the Incident:
- f. Name of the alleged offender:
- g. Names of the witnesses to the Incident:

h. The Complainant's response to the Incident:

References

1. [Manual on Safety and Security of Children in Schools](#), National Commission for Protection of Child Rights (CPRC) 2020.
2. [Being Safe Online](#), National Commission for Protection of Child Rights (CPRC), 2017
3. [FHS Inclusion policy](#)
4. [FHS School safety policy](#)
5. POCSO ACT 2012