



PATHWAYS

COMPREHENSIVE

CHILD PROTECTION

POLICY

V 08.21

1st July 2018 : V 08.18

August 2021 V 08/21 Reviewed

March 2023 V 09/23 Reviewed

TABLE OF CONTENTS

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

10	<u>Chapter – 7:</u>	
	DISCIPLINARY ACTIONS FOR STUDENTS	23
11	<u>Chapter – 8:</u>	
	ACTS AND OFFENCES IN EXTENDED ENVIRONMENTS	24
	<u>Chapter – 9:</u>	
12	PREVENTIVE MEASURES	25
13	<u>Chapter – 10:</u>	
	EMOTIONAL GROWTH AND AUGMENTATION	45

14	<u>Chapter – 11:</u>	
	CONTINUOUS ASSESSMENT OF CPP	47
15	<u>Chapter – 12:</u>	
	MONITORING OF CPP	49
15	<u>Chapter – 13:</u>	
	AMENDMENT OF CPP	50

Policy Statement

1. Pathways School Gurgaon (from here onwards known as PSG in this policy document) promotes holistic school safety, where every student has a right to a protective environment, free of violence, harassment, abuse and neglect. PSG takes appropriate action to ensure that such young people and especially vulnerable children are provided a safe learning environment at school based on respect for the child. This Child Protection Policy (CPP) addresses multiple dimensions of the vulnerability faced by the child during the entire cycle of engagement with the school based on respect for the child.
2. Pathways School Gurgaon believes that every child who participates in the school activities has the right to enjoy a safe environment and be protected from harm. In line with the **United Nations Convention on the Rights of the Child**, which states that all children have a right to protection, PSG reaffirms that it has a duty of care and obligation to protect those children for whom we are given responsibility. School believe that the welfare of children is the highest priority and it is the responsibility of everyone in Pathways to ensure that they are protected. A child-centric rights-based approach, affirmed by India's commitments to the **UN Convention on the Rights of the Child**, is deeply embedded as the guiding framework for PSG Child Protection Policy. This approach enables all children to access, participate in and benefit fully from learning opportunities in a space that inspires their confidence and holistic sense of well-being.
3. This Child Protection Policy focuses on the development of children by providing them a safe and caring environment in school campus/school trips. It provides guidelines to protect Pathways School students from physical violence, mental harassment, sexual abuse, social neglect and bullying. This Policy covers abuse, harassment, and offences that can occur in school campus and in premises under control of the Institution including virtual learning spaces, as well as extended environments organised and supervised by school (such as travel by any modes of transport organized by school, hotel on school trips, camps and perimeters of camping venues, conference venues, inter-school activities venues and any other events venues for which school is organising logistics) i.e. the areas where students are under the care of Pathways' staff, during school hours or after school hours till the time students are under the care of the employees of the school. Child Protection Policy (CPP) aims to protect Pathways' students and applies to Pathways School Staff/ Teachers/ Visitors/ Parents/ Visiting Faculty/ Third Party Service Providers who directly interact with students of Pathways School on campus or extended environment listed above.
4. Pathways School promotes a Child-Rights friendly atmosphere that is non-discriminatory, humane and considerate to protect the best interest of each child.

The school has a responsibility to provide a child sensitive and non-threatening environment where a child feels comfortable and be oneself without inhibition.

PREAMBLE

- ☉ Pathways recognizes the right of every student to a protective environment in the school premises, school buses and such extended environments, free from acts of violence, bullying, harassment, sexual abuse and neglect as defined in this Child Protection Policy;
- ☉ Pathways is committed to ensuring maximum safety to every Pathways student from acts of violence, bullying, sexual abuse, in the school premises school buses and such extended environments, as defined in this Child Protection Policy, by taking necessary preventive measures;
- ☉ Pathways follows well defined guidelines specific to any act of violence, bullying, sexual abuse, harassment and neglect in the school premises, school buses and such extended environments, as defined in this Child Protection Policy;
- ☉ Pathways is committed to supporting any/ every Pathways student/ parent who makes a complaint of acts of violence, bullying, harassment, sexual abuse etc., in the school premises, school buses and such extended environments as defined in this Child Protection Policy, against another student, teacher, other members of the staff, workmen, professionals, independent contractors/ their staff engaged by Pathways to work in the school premises, school buses and such extended environments as stipulated in this Child Protection Policy, as well as visitors to the school premises Pathways would take appropriate action as guided by Ch. 5, point 5.10 of this very policy by either forwarding the complaint to the law enforcement agencies or becoming a co-complainant so as to ensure that justice is done to the complaining student/ parent.
- ☉ Pathways is committed to extending cooperation to the law enforcement agencies inquiring into and/ or investigating complaints, by giving requisite evidence including CCTV footages etc. as and when requested / directed by the law enforcement agencies in writing and in accordance with law;
- ☉ This CPP is based on inputs taken *inter alia* from the laws in force in India such as the Indian Penal Code, Juvenile Act 1860, POCSO Act, 2012, Information Technology Act, 2000 and International Conventions and Instruments such as United Nations Convention on the Rights of the Child (CRC).

COMMENCEMENT

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

The policy is reviewed and accepted as on 1st day of August month of 2021

The reviewed policy has been accepted on 1st day of March month of 2023 year.

Chapter – 1

DEFINITIONS

In this Policy, unless the context otherwise requires, -

- (i) “Child” means a student admitted and enrolled in Pathways Schools located anywhere in India;
- (ii) “Child Abuse” is any deliberate behaviour or action which includes all forms of physical violence, mental harassment and sexual abuse that results in actual or potential harm to the child’s health, development or dignity and endangers child safety;
- (iii) “Complainant” means a student of Pathways who complains of any act or penal offence covered in Chapter–3 of this CPP and includes the parent(s) of such student;
- (iv) “Complaint” means any allegation in writing of an act or penal offence covered in Chapter–3 of this CPP;
- (v) Offender/Perpetrator/wrongdoer is a person who engages in child abuse or neglect is a person who has been determined to have caused or knowingly allowed the maltreatment of the child (by Child welfare information gateway).
– need legal inputs
- (vi) “Communication Device” has the same meaning as assigned to it in Section 2(1)(ha) of Information Technology Act, 2000;¹
- (vii) “Computer” has the same meaning as assigned to it in Section 2(1)(i) of Information Technology Act, 2000;²
- (viii) “Computer Network” has the same meaning as assigned to it in Section 2(1)(j) of Information Technology Act, 2000;³

¹ “Communication device” means cell phones, personal digital assistance or combination of both or any other device used to communicate, send or transmit any text, video, audio or image.

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

³ “Computer network” means the inter-connection of one or more computers or computer systems or communication device through– (i) the use of satellite, microwave, terrestrial line, wire, wireless or other communication media; and (ii) terminals or a complex consisting of two or more interconnected computers or communication device whether or not the inter-connection is continuously maintained.

- (ix) “Cyber Bullying” means any form of intimidation or harassment, using a computer, communication device or computer network or the Internet;
- (x) “Mental Harassment” means and includes insults, ridicule, humiliation, name-calling and repeated threats to cause physical violence to a child;
- (xi) “Penal Offence” means any offence that is punishable under the law with corporal punishment and/ or fine, such as, offences defined and punishable under the Indian Penal Code, 1860 and/ or POCSO Act, 2012 and/or the Juvenile Justice Act or any other law in force on the date of the incident;
- (xii) “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;
- (xiii) “Bullying” or “Ragging” means any disorderly conduct whether by words spoken or written or by an act which has the effect of teasing, treating or handling with rudeness any other student, indulging in rowdy or undisciplined activities which causes or is likely to cause annoyance, hardship or psychological harm or to raise fear or apprehension thereof in a fresher or a junior student or asking the students to do any act or perform something which such student will not do in the ordinary course and which has the effect of causing or generating a sense of shame or embarrassment so as to adversely affect the physique or psyche of a fresher or a junior student. The cause of indulging in ragging is deriving a sadistic pleasure or showing off power, authority or superiority by the seniors over their juniors or freshers;⁴
- (xiv) “Sexual Assault” has the same meaning as assigned to it in Section 7 of POCSO Act, 2012;⁵
- (xv) “Sexual Harassment” has the same meaning as assigned to it in Section 11 of POCSO Act, 2012;⁶

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

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

⁶ *Sexual harassment : A person is said to commit sexual harassment upon a child when such person with sexual intent,- (i) utters any word or makes any sound, or makes any gesture or exhibits any object or part of body with the intention that such word or sound shall be heard, or such gesture or object or part of body shall be seen by the child; or (ii) makes a child exhibit his body or any part of his body so as it is seen by such person or any other person; or (iii) shows any object to a child in any form or media for pornographic purposes; or*

- (xvi) “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;
- (xvii) Vulnerable is defined as the diminished capacity of a child to anticipate, cope with, resist and recover from the impact of physical, emotional and mental distress (derived from IFRC). As a result of those needs, is unable to protect oneself against abuse or neglect or the risk of it. All children are protected by the policy irrespective of vulnerability signs/status - Legal inputs required here.
- (xviii) Neglect Identifies vulnerable children who are suffering, or likely to suffer, significant harm

(iv) repeatedly or constantly follows or watches or contacts a child either directly or through electronic, digital or any other means; or (v) threatens to use, in any form of media, a real or fabricated depiction through electronic, film or digital or any other mode, of any part of the body of the child or the involvement of the child in a sexual act; or (vi) entices a child for pornographic purposes or gives gratification therefor.

CHAPTER – 2

CONFORMITY WITH LAWS IN FORCE

- 2.1 This CPP is in conformity with the relevant laws such as The POCSO Act, 2012, The Indian Penal Code, 1860, The Juvenile Justice Act and The Information Technology Act, 2000.
- 2.2 In the event, any part of this CPP is contrary to any law(s) in force, such part shall be deemed to be null and void.
- 2.3 In the event this CPP doesn't cover any legal compliance requirement on the subject of child protection, the same shall be deemed to be a part of this CPP and Pathways shall be duty-bound to follow the same.
- 2.4 This CPP does not cover an incident which is beyond the domain of the school premises, school buses and such extended environments as defined in this Child Protection Policy, when child is not entrusted to school for supervision.

CHAPTER – 3

OFFENCES AND OTHER ACTS COVERED UNDER THIS CPP

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

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

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

3.2 It is clarified that the aforesaid acts and offences are not mutually exclusive to each other but are overlapping with one another, and shall be dealt with in addition to one another. For instance, causing grievous hurt to a Pathways student is covered under the Indian Penal Code, 1860 and is a penal offence. Also, it would be covered in the aforesaid category of 'physical violence'.

CHAPTER – 4

EXTENT OF CPP

- 4.1 This CPP extends to the following areas:
- a) Pathways School campus/ premises
 - b) Pathways School buses
 - c) Extended environments:
Places other than (a) and (b) mentioned above, where the student is under the direct supervision of Pathways, such as, school camps, school trips, school conferences, inter-school activities, events, virtual learning spaces, mode of travelling including buses, trains, cars and flights. It could be during school hours or after school hours till the time students are under the direct supervision of the employees of the school.
- 4.2 This CPP applies to every Pathways' student and his parent(s) who complain of acts and offences covered in Chapter–3.
- 4.3 This CPP applies to the following persons against whom a complaint may be made by the complainant:
- a) Another student of Pathways School
 - b) Teachers of Pathways School
 - c) Staff and workmen of Pathways School
 - d) Professionals, independent contractors/ their staff engaged by Pathways to work in the school premises, school buses and such extended environments as stipulated in this Child Protection Policy
 - e) Visitors to Pathways School

Chapter – 5

COMPLAINT OF A PENAL OFFENCE

- 5.1 A complaint in writing by a student of Pathways and/ or parent(s) of such student complaining of any act that constitutes a penal offence under the law may be handed over to either of the following persons:-
- a) Form Tutor/IC/any teacher
 - b) Counsellor
 - c) School Principal/Deputy Principal
 - d) Child Protection Officer
- 5.2 Where the complaining student and/ or parent(s) of such student, is of the view that the complaint constitutes a penal offence and should be forwarded to the concerned law enforcement agency, Pathways shall forward the same to the concerned law enforcement agency.
- 5.3 If the complaining student and/ or parent(s) of such student feel the need for a legal opinion on whether the acts complained of constitute a penal offence defined by law, Pathways shall obtain a legal opinion. A written request shall be required to be made in this regard, addressed to:-
- a) School Director
 - b) Child Protection Officer
- 5.4 If the legal opinion sought in terms of clause 5.3 above is to the effect that a penal offence has been committed and such complaining student and/ or parent(s) of such student so desire that Pathways should become a co-complainant and file the joint complaint to the concerned law enforcement agencies, Pathways shall do the needful.
- 5.5 If the complaining student and/ or parent(s) of such student believe that a penal offence has been committed and no legal opinion is required and Pathways agrees that a penal offence has been committed, then Pathways will become a co-complainant if the complaining student and/ or parent(s) of such student so desire.
- 5.6 If Pathways does not agree with the complaining student and/ or parent(s) of such student, that a penal offence has been committed, Pathways shall take a legal opinion on the issue and forward the same to the complaining student and/ or parent(s) of such student. Pathways will act in accordance with the opinion.

- 5.7 Pathways will cooperate with the concerned law enforcement agencies inquiring into and/ or investigating complaints of penal offence(s) including giving evidence such as providing CCTV footages, other electronic evidence, giving statements, handing over relevant documents etc. as and when requested / directed by the law enforcement agencies in writing and in accordance with law.
- 5.8 If any member of the staff of Pathways including teachers, workmen, professionals, independent contractors/ their staff engaged by Pathways to work in the school premises, school buses and such extended environments as stipulated in this Child Protection Policy, is named as an accused in an F.I.R. or during investigation or in a Chargesheet or a summoning order or order on charge, appropriate action shall be taken by Pathways as may be deemed necessary including.
- 5.9 The student against whom a complaint is made under this Chapter shall in addition to action under the aforesaid clauses 5.1 – 5.7 stated above, be also dealt with under the Chapter-7 of this Child Protection Policy.
- 5.10 With respect to offences under POCSO (The Protection Of Children From Sexual Offences Act, 2012), Pathways is duty bound to report the offence to the concerned

law enforcement agencies in terms of Section 19⁷ and Section 21⁸ of the Act. Pathways shall report POCSO offences to the stipulated authorities.

⁷ *Reporting of offences : (1) Notwithstanding anything contained in the Code of Criminal Procedure, 1973, any person (including the child), who has apprehension that an offence under this Act is likely to be committed or has knowledge that such an offence has been committed, he shall provide such information to— (a) the Special Juvenile Police Unit; or (b) the local police. (2) Every report given under sub-section (1) shall be— (a) ascribed an entry number and recorded in writing; (b) be read over to the informant; (c) shall be entered in a book to be kept by the Police Unit. (3) Where the report under sub-section (1) is given by a child, the same shall be recorded under sub-section (2) in a simple language so that the child understands contents being recorded. (4) In case contents are being recorded in the language not understood by the child or wherever it is deemed necessary, a translator or an interpreter, having such qualifications, experience and on payment of such fees as may be prescribed, shall be provided to the child if he fails to understand the same. (5) Where the Special Juvenile Police Unit or local police is satisfied that the child against whom an offence has been committed is in need of care and protection, then, it shall, after recording the reasons in writing, make immediate arrangement to give him such care and protection including admitting the child into shelter home or to the nearest hospital within twenty four hours of the report, as may be prescribed. (6) The Special Juvenile Police Unit or local police shall, without unnecessary delay but within a period of twenty-four hours, report the matter to the Child Welfare Committee and the Special Court or where no Special Court has been designated, to the Court of Session, including need of the child for care and protection and steps taken in this regard. (7) No person shall incur any liability, whether civil or criminal, for giving the information in good faith for the purpose of sub-section (1).*

⁸ *Punishment for failure to report or record a case : (1) Any person, who fails to report the commission of an offence under sub-section (1) of section 19 or section 20 or who fails to record such offence under sub-section (2) of section 19 shall be punished with imprisonment of either description which may extend to six months or with fine or with both. (2) Any person, being in-charge of any company or an institution (by whatever name called) who fails to report the commission of an offence under sub-section (1) of section 19 in respect of a subordinate under his control, shall be punished with imprisonment for a term which may extend to one year and with fine. (3) The provisions of sub-section (1) shall not apply to a child under this Act.*

Chapter – 6

OTHER COMPLAINTS

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

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

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

- a) Child Protection Officer

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

6.3 A complaint in writing by a student of Pathways and/ or parent(s) of such student complaining of certain acts that amount to a penal offence under the law as well as acts that do not constitute a penal offence under the law may be handed over to either of the following persons:-

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

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

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

Chapter – 7

DISCIPLINARY ACTIONS FOR STUDENTS

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

CHAPTER – 8

ACTS AND OFFENCES IN EXTENDED ENVIRONMENTS

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

CHAPTER – 9

PREVENTIVE MEASURES- Reviewed by HR and GM

9.1 Pathways recognizes the right of every student to a protective environment in the school premises, school buses and extended environments, free from acts of violence, bullying, sexual abuse, as defined in this Child Protection Policy. There is a dedicated 24 x 7 surveillance centre manned by security staff monitored by administrative staff. There are 182 CCTV cameras placed at all common spaces of the school. Physical security at all entrances, all floor & common spaces of the school.

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

9.3 **Recruitment and monitoring:- Reviewed by HR and GM**

(A) MANAGERIAL/ADMINISTRATIVE AND ACADEMIC STAFF:-

9.3.1 Pathways has a “Recruitment and Selection Policy” for recruitment of administrative and academic staff in the school. Pathways strongly believes that the first step to safeguarding and promoting the welfare of children in the school, is to ensure recruitment of credible staff. As per the Pathways’ policy, recruitment of meritorious and credible staff is significant for ensuring the safety of children. As per the aforesaid policy, Pathways endeavours to attract the best possible candidates to fill the vacancies in the administrative and academic staff. The policy seeks to deter prospective candidates/ volunteers who are unsuitable to fill the vacancies, from applying for the same. Pathways endeavours to identify and reject those candidates/ volunteers who are unsuitable to work with students of Pathways.

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

9.3.3 With a view to ensure selection of meritorious and credible teaching and administrative staff, three references are required by an applicant. Due diligence through detailed enquiries are made, including feedback

from the references, before the applicant is recruited as a member of the teaching/ administrative staff.

- 9.4.4 As a part of the recruitment process, interviews of the applicants are conducted by an interviewing panel. The panel assesses the applicant's attitude towards children as also his/ her- make it (refer to 3rd gender) their ability to safeguard and promote welfare of children at Pathways. The School clearly talks about the knowledge of Child Protection to the interviewee. The applicants are required to sign an undertaking too that they have not been involved into any criminal proceedings or convicted by court in the past during.
- 9.3.4 The HR Department of Pathways also does background checks of the applicants. For all staff, obtaining Police Verification Certificate (PCC) is a mandate requirement. All new joiners are asked to submit their PCCs before they resume work.
- 9.3.5 Annually, training programmes on Child Protection, Prevention of Sexual Harassment and Cyber Security etc. are conducted by reputed training agencies, for managerial/administrative and academic staff working at Pathways and for Students and Parents.
- 9.3.6 Every member of the staff is given a valid ID Card which he/ she must ~~carry~~ wear/display all the time mandatorily.

(B) SUPPORT STAFF AND WORKMEN:- Reviewed by HR and GM

- 9.3.7 The HR Department takes utmost care before recruiting the support staff and workmen at Pathways school.
- 9.3.8 Support staff and workmen are employed by Pathways, mostly, under the flagship of CESTA, on the referral of the existing support staff and workmen, so as to ensure credibility of the recruitment process. The HR Department endeavours to ensure that the support staff and workmen sought to be inducted, have clean antecedents. The office of the School Director/ General Manager pro-actively participates and conducts interviews, before recruitment of support staff and workmen.
- 9.3.9 A police verification request is generated before the applicant is asked to join in for his/ her duties in the school.
- 9.3.10 Every support staff member and workman remains under the supervision of a senior support staff member. Support staff and workmen are constantly monitored to ensure that they do not indulge in any unlawful or unethical or anti-social activities.
- 9.3.11 Annually, training programmes on Child Protection, Prevention of Sexual Harassment and Cyber Security etc. are conducted by reputed training agencies, for support staff and workmen working at Pathways.

- 9.3.12 The support staff and workmen are continuously made aware of “Do’s and Don’t(s) in School Premises” which covers principles such as ‘No touch policy’, etc.
- 9.3.13 Briefing on Do’s and Don’t(s) is done on a regular basis so as to ensure that the concept of Child protection is ingrained in the minds and behaviour of support staff and workmen.
- 9.3.14 Every member of the staff is given an ID Card which he/ she must ~~carry~~ wear all the time mandatorily.

(C) PROFESSIONALS AND INDEPENDENT CONTRACTORS:-

- 9.3.15 Professionals and independent contractors are engaged by Pathways, after assessing their credibility and background. Background checks and enquiries are conducted before engaging them at Pathways. Pathways endeavour to ensure that professionals and independent contractors have clean antecedents without any past criminal record.
- 9.3.16 Lanyards are issued to workmen etc., with a view to clearly identify them in the school campus.
- 9.3.17 Whenever necessary, the system of Work Permit is followed so that there is effective control over independent contractors and their workmen, staff, employees, supervisors etc.
- 9.3.18 Areas where work is under progress, is physically barricaded with all the relevant signages.

(D) MONITORING VISITORS:- Reviewed by GM

- 9.3.19 As a part of preventive measures for safety and security of students of Pathways, visits to the school by outside visitors is strictly regulated. Visitors management system has been introduced whereby the visitor has only controlled access and a written confirmation to the security for having met the concerned person only as per the SOP on Visitor Management.
- 9.3.20 Chauffer driven staff cars are parked outside the school campus during school hours.

9.4 School Buses:- Reviewed by GM

Pathways endeavours to ensure that school buses that carry the students to the school and back home are safe and secure in every way. We follow guidelines laid down by Supreme Court (Suarakshit Vahan).

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

- 9.4.2 All school buses have qualified drivers and conductors. Pathways ensures that all bus drivers possess a valid Driving licence with minimum 5 years experience of driving a heavy vehicle such as a bus. The Pathways school transport department ensures that the drivers have no significant previous record of any traffic offences, challans or other offences. All school bus drivers are trained to strictly follow traffic rules and safe driving habits, such as, they must never use mobiles while driving etc. The staff is trained by the Red Cross Society and the Ministry of State transport on road safety. Transport Support staff also go through the police verification certificate as per the recruitment policy guidelines.
- 9.4.3 The Pathways school transport department conducts due diligence before recruiting school bus drivers and conductors. Pathways endeavours to ensure that the bus drivers and conductors so recruited are of clean antecedents and well – behaved. Constant training is given to bus drivers and conductors, to ensure that the Pathways’ students are safely brought to the school and taken back home. They are constantly monitored by the school authorities.
- 9.4.4 Children reaching school by bus have a safe passage from the bus to the school premises. The bus only stops within the boundary wall of the premises and school guards and Admin staff are present to ensure safe passage of children from bus drop point to respective school gates. Every single bus is emptied and no student remains in the buses, before the buses move to park or leave the premises as may be the case.
- 9.4.5 At dispersal time, all students are accompanied to the school buses in a group by a designated representative.
- 9.4.6 Every bus has either/both, one female teacher and one female helper/Didi present on the route. Therefore, presence of an adult female is ensured before the first student boards the bus at the start of the journey and till the last student gets off at the end of the journey.
- 9.4.7 Attendance of all students on the route is ensured by the teacher in charge of the bus at the start of the journey/ at the departure time.
- 9.4.8 Routing is done in such a manner that the first and last female child is accompanied by a female teacher/Didi. Routing of the buses are planned in such a manner, so that the student is dropped as close as possible to their residence.
- 9.4.9 In case there is a request during school hours to pick up a child (who regularly uses the bus) due to an emergency, such exits are permitted only with the authorized Exit slip duly signed by the respective School Principal and counter-signed by the Administrator after the consent of the respective Parents.

- 9.4.10 In case a student who usually travels by bus is being picked up by the parent for some reason, this is facilitated only after due procedure of request for special departure from parent to the school is made, and a specific Exit slip is signed by the respective Principal and the Administrator.
- 9.4.11 The bus driver ensures that the doors of the bus are closed before he begins moving, students are seated, their seat belts are fastened, and no student is exposed directly in front of the doors even when closed. Conductor/helper also ensures that there is no hindrance in passageways and all emergency exits are clear.
- 9.4.12 Every school bus has 2 CCTVs and GPS and monitoring of the same is done by the Pathways School Transport Department.
- 9.4.13 The School Transport In-charge ensures that the bus is driven only by the authorized driver always on the route by viewing of bus CCTV footage on a regular basis.
- 9.4.14 All buses are painted in yellow and have the words 'School Bus', name of school and route number are displayed prominently.
- 9.4.15 All buses do not have curtains or dark films. They have internal white lighting and activities in the bus are visible from outside.
- 9.4.16 All buses have a valid certificate of fitness, pollution and insurance certificate.
- 9.4.17 All buses have a first-aid box.
- 9.4.18 All buses have fire extinguishers.
- 9.4.19 All buses have working speed-governors and are driven within prescribed limits.
- 9.4.20 All buses carry only specified number of children permissible as per capacity and permit.
- 9.4.21 The school buses have painted on it valid telephone numbers and e-mail ids of the bus-in-charge as well as the school authorities/Admin head for feedback in case of improper driving.
- 9.4.22 The School Transport in-charge regularly organises refresher training session for the transport staff.
- 9.4.23 Due action is taken against any driver/conductor where warranted, which may include removal of the driver from services if it is a case of dangerous driving.
- 9.4.24 The person who made the complaint are informed of the action taken based on the complaint within 7 days.
- 9.4.25 These complaints are reviewed by the Administrator of the school.

9.5 **CCTV cameras:- Reviewed by GM**

- 9.5.1 The Pathways school premises are secured and safeguarded by barbed fencing and the access gates are manned and monitored round the clock. All entry gates, which provide access to visitors are equipped with Door Frame Metal Detector and Hand Held Metal Detector.
- 9.5.2 CCTV cameras have been installed at numerous places in the Pathways campus, with a monitoring control room that has an incident/ suspicious movement recording log book. Pathways has installed the infrastructure for live CCTV streaming in the monitoring control room. There are ample number of CCTV cameras strategically installed at different points in the Pathways School campus so as to minimise any probable chances whereby safety and security of Pathways' students, staff and visitors, may be compromised.
- 9.5.3 In addition to the numerous CCTV cameras installed across the Pathways School premises/ campus, CCTV cameras have also been placed at all the entry points covering the immediate vicinity.
- 9.5.4 To enhance vigilance and make it more full proofed, Pathways regularly screens the CCTV Footage on sample basis.
- 9.5.5 Respective School Principals have access to the CCTV monitoring for their respective areas. School Director has complete access of the CCTV monitoring.
- 9.5.6 Any fault/defect in the CCTV cameras is reported and rectified at the same time with the help of IT department.

9.6 **Washrooms:- Reviewed by GM**

- 9.6.1 Pathways recognises that washrooms are places where students are vulnerable to being victimized by bullying, stalking, physical violence, sexual abuse etc. and hence Pathways endeavours to create a foolproof security mechanism in and around washrooms on the Pathways premises which are meant for students. Pathways endeavours to ensure total safety for its children (especially Primary school children) in and around the washrooms on the campus.
- 9.6.2 Separate washrooms have been provided for the support staff and that they are not permitted to use the washrooms intended for Pathways' students. Academic staff uses the same washrooms as students which ensures natural surveillance.
- 9.6.3 CCTV cameras have been installed in such a manner that the security personnel deputed for monitoring purpose can monitor the entry and exit of all the washrooms and deter vandalism.

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

9.6.5 The cubicle washroom room doors are not covered till the roof and there aren't locked doors in the washrooms of children below 5 years of age. Panic button alarms have been placed in all of the washrooms of PYP as well as washrooms of MYP 1 & MYP 2. (Refer to SOP – Panic Button)

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

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

9.7 **Code of Ethics:-**

- Pathways School Gurgaon is committed to abide by, uphold and promote Child Protection standards at all times. The safety and well-being of all students is one of the governing principles at Pathways School Gurgaon. We nurture conducive environment to foster balanced relationships amongst staff and students by encouraging and expecting appropriate behaviour.
- We believe that awareness, vigilance and prevention is tantamount to keeping students safe from abuse. This is achieved through constant reinforcement of clearly laid out expectations to the Pathways community.
- Pathways School Gurgaon expects all teaching and non-teaching staff/Visitors /Parents/consultants/visiting faculty/members/interns/third party service providers who directly interact with students of Pathways School on campus or on school trips to:
 - treat all students with respect and dignity
 - establish, respect, and maintain appropriate boundaries with all students and their families.
 - monitor their behavior towards students, and pay close attention to peers to ensure appropriate and respectful behavior.
 - consider the child's reaction to any activities, conversations, behavior or other interactions. If at any time one is in doubt about the appropriateness of one's own behavior or the behavior of others, it should be discussed with the designated child protection coordinator/ Officer in Pathways School Gurgaon.
- Some examples of unacceptable behavior towards a child:
 - Criticising
 - Embarrassing
 - Shaming

- Blaming
- Humiliating
- Physical or verbal/nonverbal/ emotional/ mental abuse
- Sexual abuse

Pathways School Gurgaon will ensure:

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

Employees must not:

- Engage in any type of physical contact with a child that may make the child or an observer feel uncomfortable, or that may be seen by an observer to be violating boundaries. (As per POCSO act and Gurgaon police guidelines)
- Engage in any communication with a child within or outside of school duties, that may make the child uncomfortable or that may be seen by an observer to be violating boundaries. (As per POCSO act and Gurgaon police guidelines)
- Engage in any behavior that goes against (or appears to go against) the organization's mandate, policies, or Code of Ethics to Protect students, regardless of whether or not they are on duty.
- Conduct their own investigation into allegations or suspicions of potentially illegal or inappropriate behavior – it is an employee's duty to report the matter to his/her Principals/Child protection Officer.
- Inappropriate behavior will not be tolerated, especially as it relates to the well-being of the students involved in activities or programs delivered by the organization.
- Whether or not a particular behavior or action constitutes inappropriate behavior will be a matter determined by the organization having regard to all of the

circumstances, including past behavior, and allegations or suspicions related to such behavior.

- Every complaint regarding inappropriate behaviour or communication with a child, shall be taken cognizance of by the management of Pathways. However, whether or not a particular behavior or action constitutes inappropriate conduct, or is in contravention of the aforesaid Code of Ethics or this CPP, will be a matter determined by the management of Pathways, having regard to the relevant facts and circumstances. The findings and decision of the management of Pathways shall be final.

DECLARATION

I promise to strictly follow the rules and guidelines in this “**Code of Conduct**” as a condition of my providing services to Pathways School.

I will. :

- Comply with the mandatory reporting regulations of the organisation to report suspected child abuse.
- Cooperate fully in any investigation.

My signature confirms that I have read, understood and will abide by this Code of Conduct and that, as a person working with students, I agree to follow these standards.

I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action up to and including dismissal.

Name. : _____

Signature. : _____

Date: _____

COUNTERSIGNED BY –

HEAD – HUMAN RESOURCES

9.8 Prevention of Bullying

So as to prevent bullying in Pathways school campus/ premises or school buses or extended environment, the Principal and the teaching staff interacts with students for apprising them of their rights as well as an obligation to fight against bullying apart from complaining about the same and to generate confidence in their mind that any instance of bullying 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 Pathways and that such complaints shall be promptly dealt with while protecting the complainants from any harassment by the perpetrators of bullying. The Principal and other senior members of Pathways staff conduct meetings of teachers, parent(s) and students collectively or in groups, on bi-annual basis, to spread awareness amongst the students, teachers and parent(s) that bullying is a reprehensible act which does no good to anyone and by simultaneously generating an atmosphere of discipline by sending a clear message that no act of bullying (refer to-The Prohibition and Eradication of Ragging Bill, 2019) shall be tolerated and any act of bullying shall not go unnoticed and unpunished.

9.9 Child Protection Pledge:-

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

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

all the school staff of their responsibilities towards the students of Pathways. The Code of Conduct is as following:

As an employee of Pathways School Gurgaon, I understand my role and responsibility of an educator at all times. I know about the POCSO ACT 2012 and will take the initiative to understand all the laws pertaining to child rights. I have read thoroughly about the CPP of PSG.

As an employee of PSG I accept to:

- ❖ Give prime importance to the welfare of the child.
- ❖ Be vigilant and observant to signs and symptoms of abuse.(mentioned in the appendix of CPP)- Refer to the CPP
- ❖ Actively participate in all trainings/ sessions on child safety conducted by school/organisations selected by school
- ❖ Work cooperatively in actions required to safeguard the children.
- ❖ Work cooperatively with parent(s) to ensure the child's safety.
- ❖ Support and share any information with relevant person/s that can help the school and the child.
- ❖ Be rational and non-Judgmental with each child.
- ❖ Understand the confidentiality associated with all the concerned issues of a child.
- ❖ Work towards achieving the well-being of the child.
- ❖ Ask for help if I cannot handle a situation with a child at any given time.
- ❖ View safety of all children of PSG as my duty and my responsibility in campus or school trips.
- ❖ All members of school community must be treated with respect.
- ❖ Be alert and to report any behavior that indicates a child being at risk or harm.
- ❖ Never allow any kind of inappropriate behavior by children or any other employee.

DECLARATION

I promise to strictly follow the rules and guidelines in the “**Child Protection Pledge**” as a condition of my providing services to Pathways School.

My signature confirms that I have read, understood and will abide by this Code of Conduct and that, as a person working with students, I agree to follow these standards.

I understand that any action inconsistent with this “**Child Protection Pledge**” or failure to take action mandated by this **Pledge** or has been documented in **Pathways Gurgaon Child Protection Policy** may result in disciplinary action up to and including dismissal.

Name. : _____

Signature. : _____

Date: _____

COUNTERSIGNED BY –

HEAD – HUMAN RESOURCES

CHAPTER – 10

EMOTIONAL GROWTH AND AUGMENTATION

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

- 10.1 Pathways regularly conduct sessions by eminent psychologists and counsellors, to speak to and interact with students of Pathways with a view to enhance the Emotional Quotient (EQ) and will - power of students to face life bravely. These sessions help the students to build courage to:
- complain against any wrongdoing and injustice,
 - lead a happy and fulfilling life,
 - avoid use of drugs and psychotropic substances,
 - avoid addiction to smartphones and the virtual world,
 - encourage them in having healthy interaction with peers and the opposite sex,
 - respect women,
 - be patient but not tolerant to injustice, be aware of the use and abuse of the internet and technology etc.
- 10.2 Pathways school has a Counselling Department, to ensure the well-being of every student. The department has a robust team of professionally qualified Counsellors who constantly support every child for their well-being and holistic development.
- 10.3 The school has a PSPE program, a PULSE program and Well-being program which helps to build a strong pastoral care system in the school.

CHAPTER – 11

CONTINUOUS ASSESSMENT OF CPP

- 11.1 This CPP shall be comprehensively assessed annually so as to improvise the same in line with contemporaneous society.
- 11.2 Students and parent(s) are free to give suggestions to improvise the CPP.
- 11.3 Every student of Pathways has an option to give confidential and anonymous feedback in the form of inputs/suggestions/concerns regarding the implementation of this CPP, as well as to point out if any activity(s) constituting acts and offences covered in Chapter-5 and Chapter-6 have been observed by such student. Such feedback can be addressed to Child Protection Committee and put in a 'Suggestion Box' or sent by post as a confidential letter/helpline no. It is clarified that such observations regarding activities shall not be taken as a complaint and acted upon in terms of Chapter-5 and Chapter-6 of this CPP. However, the school authorities shall take appropriate steps to stop any such activities that are found to have been committed. An audit called "Child Security Audit" shall be conducted annually at the Pathways School by a committee constituted by Pathways Management. The audit shall be a critical analysis and evaluation of the safety and security of children at large studying in Pathways school. An audit report shall be prepared and published annually. Any parent shall have a right to obtain a copy thereof.

CHAPTER – 12

MONITORING THE CPP

- 12.1 This CPP shall be monitored by a committee or committees constituting of members, as may be formed from time to time by the Management of Pathways.
- 12.2 The various actions required to be taken under this CPP, such as forwarding the complaint of a penal offence to the law enforcement agency, becoming a co-complainant, seeking legal opinion, taking disciplinary action against the wrongdoers /offenders and all other acts in connection with this CPP, shall be done by a committee or committees or Senior Staff Members who may be appointed for this purpose by the Management of Pathways.
- 12.3 Pathways presently have allocated responsibilities of protection of Pathways students, to members of the Child Protection Committee, Child Protection Officers and an overall Head Pathways presently are following in letter and spirit the numerous guidelines issued by law enforcement agencies and other bodies.

CHAPTER – 13

AMENDMENT OF CPP

- 13.1 This CPP to be reviewed every second year and amended (if required) by the Management of Pathways or by a committee appointed for this purpose.
- 13.2 Before amending or revising this CPP, Pathways Management may involve stakeholders such as the senior teaching staff, Counsellor, experts in the field of child protection, former Senior Police Officers and others.