



APEEJAY CHILD SAFEGUARDING, SAFETY AND WELFARE POLICY



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APEEJAY SAFEGUARDING POLICY



APEEJAY CHILD SAFEGUARDING, SAFETY & WELFARE POLICY

The safety, security, dignity, and welfare of every student and individual entering our school campus form the foundation of our institutional ethos. This document presents the School Safety and Welfare Policy, reflecting our commitment to creating and sustaining an environment where children learn with confidence, staff work with assurance, and all visitors experience respect and protection.

In alignment with national child protection norms and CBSE requirements, the policy defines clear systems, responsibilities, behavioural expectations, and operational procedures for safeguarding every member of the school community. It outlines preventive structures, reporting mechanisms, and monitoring frameworks to ensure that safety is embedded in every aspect of school functioning and takes care of all the stakeholders.

This policy is an expression of our collective responsibility to uphold a culture of vigilance, transparency, and accountability. All staff, students, parents, contractual personnel, and visitors are expected to understand, respect, and adhere to the principles and procedures contained herein.

1. INTRODUCTION

This policy outlines the school's commitment to ensuring the safety, security, welfare, and holistic protection of all students, staff (teaching and non-teaching, support staff), visitors, and parents present on campus at any time. It establishes operational systems, responsibilities, codes of conduct, and mechanisms to maintain a safe learning environment in alignment with national child protection norms and CBSE requirements.

2. VISION AND PURPOSE

- i. To safeguard the physical, emotional, and psychological well-being of every student.
- ii. To establish clear protocols ensuring the safety of staff and visitors.
- iii. To create a culture of vigilance, responsibility, transparency, and accountability.
- iv. To align with mandatory CBSE norms for school safety, child protection, and well-being.

3. SCOPE

Applicable to all students, teaching and non-teaching staff, administrative teams, outsourced and contractual personnel, labour/vendors/technicians allowed on campus, volunteers, visitors, parents, and participants of school-related off-site activities.

This policy applies to:

- i. All students enrolled in the school
- ii. All teaching, administrative, and support staff
- iii. Contractual and outsourced service providers



- iv. All labour/vendors/technicians/handyman/service providers who have been permitted by the School to carry out any work within the school campus or are visiting the school for any purpose whatsoever.
- v. Visitors, volunteers, and parents entering the school campus
- vi. Any individual participating in school-organized off-site activities

4.STATUS OF THE DOCUMENT AND HOW TO USE IT

This document forms part of the School's core safeguarding framework, designed to ensure the safety and well-being of students, staff, and all stakeholders.

It must be read in conjunction with:

- i. CBSE Safety Guidelines and Circulars
- ii. POCSO Act
- iii. POSH Act
- iv. Juvenile Justice Act
- v. Any other applicable State regulations

This policy:

- i. Defines operational procedures and responsibilities
- ii. Establishes clear reporting and escalation mechanisms
- iii. Provides guidance for professional judgement, while ensuring legal compliance

All staff are required to:

- i. Read and understand this document
- ii. Follow all procedures without exception
- iii. **Refer to the corresponding Annexures for detailed protocols**

5.GOVERNANCE AND ROLES & RESPONSIBILITIES

(ANNEXURE B)

A. Governing Body / Trustees

The Governing Body ensures that under the direction of the CEO, each school:

- i. Has a robust Safeguarding & Child Protection Policy
- ii. Complies with CBSE and statutory requirements
- iii. Implements safe recruitment practices
- iv. Maintains effective systems for managing allegations
- v. Conducts annual policy review and audit
- vi. Promotes safeguarding as a strategic priority

B. Chief Executive Officer (CEO)

The CEO is responsible for:



- i. Ensuring consistent safeguarding implementation across all schools
- ii. Monitoring:
 - a. Incident reports
 - b. Serious complaints
 - c. Legal compliance
 - d. Providing strategic direction and oversight
 - e. Ensuring training frameworks and accountability systems
 - f. Ensures all schools have a Safeguarding team

C. Principal (Head of the School)

The Principal:

- i. Ensures full implementation of this policy
- ii. Appoints the following Roles:
 - a. Appointed Safeguarding Lead Officer
 - b. Asst. Safeguarding Lead
 - c. School Safety Committee, Child Protection Committee, and Internal Complaints Committee (ICC) as per compliance regulations.
- iii. Ensure legal compliance with CBSE norms and State safety regulations.
- iv. Allocate resources for safety infrastructure, training, and emergency preparedness.
- v. Ensures all staff understand how to identify, report, and record concerns
- vi. Allocates time, training, and resources for safeguarding
- vii. Ensures a safe culture where staff can raise concerns
- viii. Reports serious cases immediately to the Management and higher authorities

D. Appointed Safeguarding Lead Officer (ASLO)

The Appointed Safeguarding Lead Officer (ASLO) will be appointed from amongst the senior leadership team or a senior staff member who possesses the required authority, experience, and has undergone appropriate safeguarding training. The ASLO will hold the primary responsibility for child protection and overall day to day implementation of the Safeguarding Policy within the school.

Supporting the ASLO, an Assistant Safeguarding Lead (ASL) may be appointed. The ASL will:

- i. Work in close coordination with the ASLO and the Principal
- ii. Support day-to-day safeguarding processes and documentation
- iii. Act as the designated point of responsibility in the absence or unavailability of the ASLO, ensuring continuity in response and decision-making

The selection of ASLs will be based on:

- i. Experience in student handling and pastoral care
- ii. Sensitivity to child protection concerns
- iii. Availability within and beyond school operational hours
- iv. Willingness to undergo safeguarding training



E. School Safety Committee (SSC)

The School Safety Committee will function as the core operational body for implementing and monitoring all aspects of student safety and well-being (physical, emotional, and social). It looks after the holistic safety concept- physical, social, emotional, cyber, infrastructural and any other dimension related to internal members, external visitors or stakeholders and vendors.

Composition:

- i. Principal (Chairperson)
- ii. Appointed Safeguarding Officer (ASLO)
- iii. Assistant Safeguarding Lead(s)
- iv. School Counsellor
- v. Admin Representative (preferably Admin Manager)
- vi. One Sports Faculty Member
- vii. 2 Teachers representing different wings (FY, Primary, Middle, Senior School)
- viii. Student Representatives – one boy and one girl (senior-most, preferably Student Council members)
- ix. One Parent Representative

Key Roles & Responsibilities:

- i. Monitor overall safety and well-being of students
- ii. Review incident reports and identify trends
- iii. Conduct periodic safety audits and drills
- iv. Recommend preventive and corrective measures
- v. Ensure implementation of safeguarding procedures across the school

Tenure and Rotation of the School Safety Committee Members

- i. Members of the School Safety Committee may be appointed initially for a term of two years
- ii. The term may be extended for one additional cycle based on requirement
- iii. To maintain objectivity and effectiveness:
 - a. Partial rotation of members is recommended every two years
 - b. Inclusion of new members will ensure continued vigilance and balanced representation

F. Child Protection Committee (CPC)

The Child Protection Committee will function in close alignment with the Appointed Safeguarding Lead Officer and may consist of a core subset of SSC members, particularly those directly involved in handling sensitive safeguarding cases related specifically to students

Composition:

- i. Appointed Safeguarding Lead Officer



- ii. Assistant Safeguarding Lead
- iii. School Counsellor
- iv. One trained teacher member (from the SSC)
- v. Principal (oversight role)

Role:

- i. To handle sensitive child protection concerns
- ii. To ensure compliance with legal requirements under the POCSO Act
- iii. To maintain confidentiality and documentation
- iv. To coordinate with external authorities where required

G. Internal Complaints Committee (ICC – POSH)

The Internal Complaints Committee (ICC) is a mandatory statutory body under CBSE guidelines and the POSH Act. The school already has an ICC in place comprising:

- i. Teacher representatives (one male and one female)
- ii. School Counsellor
- iii. Administrative Manager
- iv. Principal (special invitee)- if required

The ICC will continue to function as a specialised sub-committee within the broader safeguarding framework, with a clearly defined mandate to address:

- i. Workplace harassment complaints- by teaching, non-teaching, support staff- within the premises of the school
- ii. Gender-sensitive issues involving staff and students
- iii. Any concern of sexual abuse or gender prejudice at workplace

H. Operational Alignment with the Safeguarding Policy:

The ICC will handle cases reported directly to it, when a complaint is reported by a staff.

In cases/incidents reported to the School Safety Committee (SSC) involving sexual harassment, the matter may be formally referred to the ICC for appropriate action

To ensure coordination, the Appointment Safeguarding Lead Officer (ASLO) may be included as a member of the ICC, in line with CBSE norms (noting that the Principal, Vice Principal, and Management representatives are not part of ICC decision-making processes beyond prescribed roles)

The formation and functioning of the ICC with regular recorded meetings is mandatory CBSE compliance and has to be continued.

I. School Staff- Teaching & Non-Teaching /Admin

All staff must be able to:



- i. Recognise signs of abuse or distress in children
- ii. Listen to children without judgement
- iii. Record and report concerns immediately
- iv. Maintain professional boundaries
- v. Maintain a safe classroom environment.
- vi. Monitor student behaviour, attendance, and well-being.
- vii. Report any safety concerns or child protection issues immediately.
- viii. Accompany students responsibly during excursions, events, and transitions.

J. Administrative & Support Staff

- i. Ensure security, cleanliness, and maintenance of facilities.
- ii. Follow visitor management and entry protocols.
- iii. Report suspicious behaviour or hazards.
- iv. Uphold confidentiality in handling records.

K. Visitors & Parents Visiting the School

- i. Comply with school security protocols, including registration and ID display.
- ii. Avoid restricted areas unless authorized.
- iii. Respect school timings, processes, and staff instructions.
- iv. Report any safety concern observed on campus.

L. Students

- i. Follow school rules and safety guidelines.
- ii. Treat peers respectfully and report bullying or unsafe incidents.
- iii. Participate in safety drills and awareness programs.

I. Protection of Children & Safeguarding their Rights

- i. Zero tolerance for abuse, neglect, exploitation, or discrimination.
- ii. Mandatory adherence to the POCSO Act, juvenile safety regulations, and CBSE child protection guidelines.
- iii. Establishment of a Child Protection Committee (CPC) and safe reporting mechanisms enabling children to express concerns without fear.
- iv. Confidentiality in handling child-related information.
- v. Age-appropriate education on safe/unsafe touch, online safety, and personal boundaries.

6. CHILD PROTECTION PROCEDURES (ANNEXURE C)

Responding to a Disclosure

If a child makes a disclosure, following steps to be followed by the School Staff and/or SSC

They must



- i. Listen carefully and calmly
- ii. Not interrupt or investigate
- iii. promise absolute confidentiality
- iv. Reassure the child
- v. Record facts accurately

Recording and Reporting

All concerns must be:

- i. Recorded immediately
- ii. Reported to the APPOINTED SAFEGUARDING LEAD OFFICER without delay and the concerned statutory authorities within the timelines as mandated by law.

Standard Incident Reporting Format to be used (**Annexure A**).

Escalation

SSC assesses severity and informs the Principal, will report under the POCSO Act (mandatory) and maintain confidentiality at all stages.

Allegations Against Staff

- i. Must be reported immediately to the Principal, who will then inform the CEO/management and follow the required POSH / disciplinary procedures and carry out legal reporting where required.

II. Complaint Procedures

- i. A clearly displayed complaint box accessible to students.
- ii. Multiple channels for filing concerns:
 - a. Written complaints
 - b. Verbal reporting to class teachers/SSC/Safeguarding Lead Officer
 - c. Email helplines or online grievance forms.
- iii. Complaints are acknowledged within 48 hours.
- iv. Immediate protective steps taken if the complaint involves student safety.
- v. Investigation conducted by the appropriate committee and will be resolved at the early as possible.

III. Recruitment Policies for Safer Staffing

- i. Background verification for all staff including:
 - ii. Police verification
 - iii. Reference checks
 - iv. Document verification
 - v. Mandatory signing of Code of Conduct and Child Protection Declaration.
 - vi. Probation monitoring for new hires.
 - vii. Outsourced personnel must meet the same verification and training standards.
 - viii. No individual with a past record of offences against children should be employed.
 - ix. Mandatory explanation of employment gaps



IV. Safe Code of Conduct

All adults on campus must adhere to the following:

- i. Maintain professional boundaries with students.
- ii. No physical punishment, verbal abuse, or humiliation.
- iii. Avoid one on one interaction with a student in isolated spaces.
- iv. Use only approved communication channels for student interactions.
- v. Treat all students equitably regardless of gender, ability, background, or identity.
- vi. Dress modestly and behave ethically.
- vii. Report any observed violation of safety norms immediately.

7. TRAINING & INDUCTION (ANNEXURE E)

- i. Mandatory induction training before joining
- ii. Annual training for all staff
- iii. Advanced training for the members of the SAFEGUARDING LEAD OFFICER
- iv. Regular updates and refresher sessions

V. Staff / Personnel Training

The school will provide structured training on:

- i. Child protection and POCSO awareness
- ii. First aid and CPR
- iii. Disaster management and emergency evacuation
- iv. Health, hygiene, and sanitation protocols
- v. Managing behavioural issues and inclusive education
- vi. Cyber safety and digital citizenship

**Training frequency: At least twice a year, plus induction sessions for new staff.
(ANNEXURE E)**

VI. Attendance Recording for Students, Staff & Visitors

Students

- i. Daily reporting to parents for absenteeism.
- ii. Cross-verification during relocations (e.g., sports, labs).
- iii. Supervision during arrival, dispersal, and breaks

Staff

- i. Digital attendance monitoring.
- ii. Attendance Register

Visitors

- i. Mandatory visitor registration including:
 - a. Name, contact number, Purpose of visit, ID verification, Entry and exit time
- ii. Visitors issued temporary ID badges.



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8. ANTI-BULLYING POLICY – APEEJAY SCHOOLS (RESPONSIBILITIES)

Apeejay Schools shall maintain a clear Anti-Bullying Policy as part of its wider framework, including behaviour, online safety, and complaints policies. The policy will be reviewed regularly, with active involvement of students in its development and implementation, as a whole-school approach is essential to ensure effectiveness.

Responsibilities:

- i. Corporate Governance: Ensure all schools have effective Anti-Bullying policies in place.
- ii. Principal/Head of School: Communicate the policy, ensure fair and consistent disciplinary action, and provide a prompt system for reporting concerns.
- iii. School Management: Monitor and review the policy regularly.
- iv. Staff: Implement and uphold the policy, and respond to incidents appropriately.
- v. Parents/Guardians: Support their children and work in partnership with the school.
- vi. Students: Follow the policy and promote a respectful environment

9. STUDENT SAFETY EDUCATION

To be integrated into the curriculum:

- i. Personal safety (good touch/bad touch)
- ii. Cyber safety
- iii. Anti-bullying (**ANNEXURE D**)
- iv. Emotional well-being

10. COMPLAINTS AND WHISTLEBLOWING

- i. All staff and students must feel safe to report concerns
- ii. Anonymous reporting allowed
- iii. No retaliation policy

Empowering Students to Keep themselves Safe

The school will conduct:

- i. Life skills and self-protection workshops
- ii. Anti-bullying and sensitization programs
- iii. Cyber safety and digital literacy lessons
- iv. Awareness sessions on good touch/bad touch and consent
- v. Leadership and peer-mentoring programs

Students are taught to:

- i. Identify unsafe situations



- ii. Seek help from trusted adults
- iii. Use emergency contact points

11. OFF-SITE AND TRANSPORT SAFETY

- i. Risk assessments mandatory
- ii. Verified vendors
- iii. Staff supervision
- iv. Emergency preparedness

Extended School & Off-Site Visits (ANNEXURE F)

- i. Detailed risk assessment before trips.
- ii. Written parental consent and indemnity mandatory.
- iii. Adequate number of staffs accompanying students including female attendants.
- iv. Verified transport providers and GPS-tracked vehicles.
- v. Driver, helper and attendant background verification is required.
- vi. Medical kits and emergency contacts carried during excursions.
- vii. Clear behaviour expectations communicated to students.

12. PROCEDURE: CONCERNS ABOUT A CHILD'S WELFARE

At Apeejay Schools, staff or volunteers may occasionally have concerns about a child's welfare even in the absence of clear evidence. Such concerns may arise from changes in behaviour, unusual expressions through art or writing, or the observation of minor or inconclusive physical signs.

In such situations, staff should provide the child with a safe and supportive opportunity to talk, without making assumptions. It is appropriate to gently check on the child's wellbeing and offer support, recognising that these signs may also relate to other personal circumstances such as family changes, loss, or illness. Staff must not attempt to investigate the matter themselves, but should remain observant and responsive .

All concerns, however minor, must be reported promptly to the SAFEGUARDING LEAD OFFICER and recorded on the school's safeguarding system (Guard). Even where concerns do not meet the threshold for formal safeguarding intervention, they may form part of a broader pattern and will be addressed through the school's pastoral care and welfare processes

13. PROCEDURE: IF A CHILD DISCLOSES TO A STAFF MEMBER

At Apeejay Schools, we recognise that it requires significant courage for a child to disclose abuse or concerns about their safety. Children may feel fear, shame, confusion, or may have been threatened, and may not always fully understand that what they are experiencing is harmful.



If a child shares a concern, staff must handle the situation with sensitivity and care. The staff member must inform the child, in an appropriate manner, that the information cannot be kept confidential and will need to be shared with the SAFEGUARDING LEAD OFFICER to ensure their safety.

During such interactions, staff shall:

- i. Listen carefully and allow the child to speak freely without interruption
- ii. Remain calm, supportive, and reassuring
- iii. Avoid asking leading or investigative questions; only clarify when necessary
- iv. Reassure the child that they have done the right thing and that the situation is not their fault
- v. Not promise confidentiality or offer inappropriate physical comfort
- vi. Respect pauses and not pressure the child to continue

Staff must clearly explain the next steps to the child and ensure that appropriate support is provided. All disclosures must be recorded promptly and accurately on the school's safeguarding system, and reported immediately to the SAFEGUARDING LEAD OFFICER for further action, in line with safeguarding procedures.

Staff should also seek appropriate support if they feel distressed following a disclosure.

14. RECORD KEEPING (ANNEXURE G)

- i. Secure safeguarding records (at least 5 years after a student leaves from the school)
- ii. Restricted access
- iii. Legal compliance in documentation

Record Keeping

Secure digital and/or physical records maintained for:

- i. Attendance
- ii. Medical information
- iii. Safety drills
- iv. Complaint registers
- v. Incident reports
- vi. Staff verification documents

Visitor logs

- i. Records confidential and accessible only to authorized personnel.
- ii. Periodic review and archival according to statutory norms.



15. MONITORING AND REVIEW

- i. Monthly committee reviews
- ii. Annual policy review
- iii. Incident-based revisions

Review of Policy

This policy will be reviewed annually or earlier if CBSE or government guidelines change. The School Safety Committee will oversee updates.

APEEJAY SAFEGUARDING POLICY



ANNEXURE A

STANDARD INCIDENT REPORTING FORMAT

SECTION 1: BASIC INFORMATION

- i. Incident Report Number: _____
- ii. Date of Report: _____
- iii. Time of Report: _____
- iv. Name of Reporting Staff: _____
- v. Designation: _____
- vi. Contact Details: _____

SECTION 2: INCIDENT DETAILS

- i. Date of Incident: _____
- ii. Time of Incident: _____
- iii. Location of Incident:

Classroom Playground Corridor Bus Washroom Outside Campus

Any Other: _____

- iv. Type of Incident (Tick all applicable):

- Injury / Accident
- Bullying / Peer Conflict
- Behavioural Concern
- Child Protection Concern
- Allegation against Staff
- Safety Hazard
- Cyber Incident
- Other: _____

SECTION 3: PERSON(S) INVOLVED

A. STUDENT(S) INVOLVED

NAME	CLASS/SEC	GENDER	ROLE(VICTIM/WITNESS/ANY OTHER)	REMARKS



B. STAFF/ADULT(S) INVOLVED, IF ANY

NAME	DESIGNATION	ROLE(VICTIM/WITNESS/ANY OTHER)	REMARKS

C. WITNESSES (IF ANY)

NAME	ROLE (STUDENT/STAFF/OTHERS)	BRIEF DESCRIPTION	REMARKS

SECTION 4: DESCRIPTION OF INCIDENT

(To be written factually. No assumptions, opinions, or interpretations.)

SECTION 5: ACTION TAKEN (IMMEDIATE RESPONSE)

- i. First aid provided: Yes No
- ii. Student separated from risk: Yes No
- iii. Parent informed: Yes No (Time: _____)
- iv. Referred to Counsellor: Yes No
- v. Referred to Admin/Principal: Yes No

Details of Immediate Action Taken:

SECTION 6: SAFEGUARDING / ESCALATION

- i. Reported to SSC Yes No
- ii. Date & Time of Reporting: _____
- iii. Further Action Required:

- Monitoring
- Counselling
- Disciplinary Action
- Parent Meeting
- External Reporting (if applicable under law)

SECTION 7: RISK ASSESSMENT

- i. Is the child currently at risk? Yes No
- ii. If yes, describe nature of risk:



SECTION 8: FOLLOW UP ACTION PLAN

ACTION REQUIRED	RESPONSIBLE PERSON	TIMELINE

SECTION 9: CONFIDENTIALITY DECLARATION

I confirm that the information recorded above is accurate and based on factual observation.
I understand that this document is confidential and must be handled in accordance with the school Safeguarding Policy.

Signature of the reporting staff:-

Date :-

SECTION 10: REVIEW BY THE DESIGNATED AUTHORITY

Reviewed by Principal/CEO

Date :

Remarks-

SECTION 11: FINAL CLOSURE

Case Status

- Closed
- Ongoing

Signature: Principal



ANNEXURE B: ROLES AND RESPONSIBILITIES (DETAILED)

Governing Body / Trustees

The Governing Body shall:

Ensure the school has:

- i. A Safeguarding & Child Protection Policy
- ii. A Staff Code of Conduct
- iii. A Safer Recruitment Policy

Ensure compliance with:

- i. CBSE norms
- ii. Statutory laws and local regulations

Review:

- i. Annual safeguarding reports
- ii. Serious incident cases

Allocate adequate:

- i. Financial resources
- ii. Infrastructure support

Ensure:

- i. Independent and unbiased handling of serious allegations
- ii. Promote safeguarding as a strategic and organisational priority

Chief Executive Officer (CEO)

The CEO shall:

Ensure

- i. Uniform safeguarding standards across all schools
- ii. Training frameworks are implemented across all units/Schools

Monitor:

- i. High-risk incidents
- ii. Legal compliance
- iii. Policy implementation

Review:

- i. Incident trends and audit findings

Provide:

- i. Strategic direction
- ii. Escalation support in critical cases



Principal (Head of the School)

The Principal shall:

- i. **Hold overall accountability** for safeguarding implementation

Appoint:

- i. Safeguarding Lead Officer
- ii. Assistant Safeguarding Leads

Ensure:

- i. All staff understand reporting procedures
- ii. Safe culture for reporting concerns

Allocate:

- i. Time and resources for safeguarding

Ensure:

- i. Immediate reporting of serious cases to the authorities

Conduct:

- i. Periodic safeguarding reviews

Maintain:

- i. Confidential records

Vice Principal

Support the Principal in implementation and monitoring

Supervise:

- i. Day-to-day student safety practices

Ensure:

- i. Staff compliance with reporting protocols

Act as:

- i. Alternate escalation authority in absence of Principal

Assist in:

- i. Training, drills, and awareness programmes

Appointed Safeguarding Lead Officer:

The Appointed Safeguarding Lead officer shall:

- i. **Take lead responsibility** for safeguarding and child protection



Receive and manage:

- i. All incident and safeguarding reports

Maintain:

- i. Secure and confidential records

Assess:

- i. Risk level and required action

Escalate:

- i. Cases under POCSO to authorities

Guide staff on:

- i. Handling disclosures

Coordinate:

- i. With counsellors, parents, and agencies

Ensure:

- i. Timely documentation and follow-up

School Safety Committee (SSC) Members

SSC Members shall:

Monitor:

- i. Physical safety (infrastructure, transport)
- ii. Emotional well-being (bullying, behaviour)

Conduct:

- i. Monthly safety audits

Review:

- i. Incident reports and trends

Recommend:

- i. Preventive measures

Ensure:

- i. Safety drills are conducted regularly and periodically

Report findings to:

Principal and CEO



i. **Note on the Composition and Functioning of the School Safety Committee (SSC), Child Protection Committee (CPC), and Internal Complaints Committee (ICC)**

The School Safety Committee (**SSC**) shall function as the primary body overseeing the overall physical, emotional, psychological, and social well-being of students within the school environment. The Committee shall work in coordination with the Appointed Safeguarding Lead Officer (ASLO), Assistant Safeguarding Lead(s), school leadership, counsellors, and other designated members to ensure effective implementation of the School Safeguarding, Safety & Welfare Policy.

The Child Protection Committee (**CPC**) shall function as a focused safeguarding body responsible for handling sensitive child protection concerns and ensuring compliance with statutory requirements under the POCSO Act and relevant CBSE child protection guidelines. The CPC may comprise selected members of the SSC directly associated with safeguarding responsibilities.

The Internal Complaints Committee (**ICC**), constituted as per statutory and CBSE requirements under the POSH Act, shall continue to function as an independent statutory committee for addressing complaints related to workplace harassment and gender-sensitive concerns involving staff and students.

For effective coordination within the safeguarding framework:

- i. The ICC shall handle cases reported directly to it in accordance with applicable statutory procedures.
- ii. In cases reported to the School Safety Committee involving sexual harassment or related concerns, the matter may be formally referred to the ICC for further inquiry and appropriate action.
- iii. To ensure continuity and coordination between committees, the Appointed Safeguarding Lead Officer (ASLO) can be included as a member of the ICC, subject to applicable CBSE norms and statutory requirements.
- iv. Wherever required, there may be overlapping membership between the SSC, CPC, and ICC to ensure coordinated safeguarding response while maintaining procedural independence of statutory committees.



ANNEXURE C: CHILD PROTECTION REPORTING FLOWCHART

Step 1: Concern Arises

Observation / Disclosure / Complaint by Student / Staff / Parent / Visitor



Step 2: Immediate Response (Staff)

- i. Listen calmly
- ii. Do NOT investigate
- iii. Ensure child safety



Step 3: Record the Incident

- i. Complete Incident Reporting Format
- ii. Record factual details only



Step 4: Report to Appointed Safeguarding Lead Officer

- i. Within same working day (mandatory)



Step 5: Initial Assessment by ASLO

Determine:

- i. Risk level
- ii. Immediate action required



Step 6: Escalation

- i. Inform Principal
- ii. If applicable then report under POCSO Act (mandatory legal reporting)



Step 7: Action Taken

- i. Protection measures
- ii. Counselling
- iii. Parent communication
- iv. External reporting (if required)





Step 8: Documentation & Monitoring

- i. Maintain confidential records
- ii. Monitor child well-being



Step 9: Closure / Follow-up

- i. Case review
- ii. Preventive measures implemented

APEEJAY SAFEGUARDING POLICY



ANNEXURE D: STUDENT BEHAVIOUR & ANTI-BULLYING POLICY

Objectives

- i. Promote respectful behaviour
- ii. Prevent bullying and harassment
- iii. Ensure emotional safety

Definitions

- i. Physical bullying
- ii. Verbal bullying
- iii. Social exclusion
- iv. Cyberbullying

Preventive Measures

- i. Awareness sessions
- ii. Life skills education
- iii. Class discussions

Reporting Mechanism

- i. Teachers / Counsellor / Complaint box

Intervention

- i. Immediate separation of students
- ii. Counselling
- iii. Parent involvement

Disciplinary Measures

- i. Age-appropriate corrective action
- ii. No corporal punishment

Monitoring

- i. Repeat incidents tracked
- ii. Behaviour records maintained



ANNEXURE E: TRAINING & INDUCTION FRAMEWORK

Induction Training (Mandatory Before Joining)

- i. Safeguarding policy
- ii. Code of conduct
- iii. Reporting procedures

Annual Training (All Staff)

- i. Child protection & POCSO
- ii. POSH awareness
- iii. First aid & CPR
- iv. Cyber safety

Advanced Training

- i. SAFEGUARDING LEAD OFFICER specialised training
- ii. Leadership workshops

Frequency

- i. Minimum twice a year
- ii. Refresher sessions quarterly

Documentation

- i. Attendance records
- ii. Training feedback
- iii. Certification records

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ANNEXURE F: OFF – SITE VISIT RISK ASSESSMENT FORMAT

Basic Details

- i. Trip location, date and duration
- ii. Number of Students

Risk Identification

RISK	LIKELIHOOD	MITIGATION METHOD/PROCESS

Supervision Plan

- i. Teacher-student ratio
- ii. Assigned responsibilities

Emergency Preparedness

- i. First aid kit
- ii. Emergency contacts

Approvals

- i. Principal's approval
- ii. Parent consent

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ANNEXURE G: RECORD KEEPING FORMATS

The school shall maintain:

1. Incident Register

- i. Date, type, action taken

2. Safeguarding Records

- i. Confidential case files

3. Visitor Log Book

- i. Entry/exit details

4. Staff Verification Records

- i. Police verification
- ii. Documents

5. Training Records

- i. Attendance and modules

6. Safety Drill Records

- ii. Date, type, observations

Confidentiality Clause

- i. Access restricted to only authorised personnel
- ii. Records stored securely (physical/digital)

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