



**WELLINGTON
COLLEGE
INTERNATIONAL
PUNE**

Abridged Child Protection Policy

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Approved By-

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Wellington College International Pune (WCI Pune)
Abridged Child Protection Policy (2024-2025)

This document is derived, with permission, from the 'School Safety & Child Protection Manual' produced for FICCI ARISE (Federation of Indian Chambers of Commerce & Industry), compiled by Ms Sannah Batta (Advocate and Educationalist). The guidance is intended for stakeholders of all schools in India and Wellington College International Pune (WCI Pune) has adopted this benchmark.

This is an abridged version of our fuller reference document (Safeguarding Children & Child Protection: Policy and Guidance) and it has been compiled for staff accessibility (day to day usage). Further guidance is provided in the longer policy, together with information on recording staff comments on the MyConcern system (guidance on which is provided in Appendix 7 in this document also).

Training will also be provided to colleagues on all safeguarding advice and school procedures.

Introduction

Wellington College International Pune (WCI Pune) believes in holistic school safety, where every pupil has a right to a protective environment, free of violence, harassment, abuse and neglect, and based on respect for the child.

WCI Pune is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The College recognises that children and young people learn best when they are healthy, safe and secure.

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. At Wellington College International Pune decisions to report or act upon known or suspected cases of child abuse or neglect will be based on the preliminary investigation which points to such an act having been committed as defined by the Protection of Children from Sexual Offences (POCSO) Act, 2012.

This policy applies to all pupils in the College, including boarders (when relevant). The purpose of this policy is to inform staff, parents, contractors, volunteers and governors about the College's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils – even where this is away from the College, such as on educational visits or undertaking remote learning.

This policy is published on the College website and is available to parents of current and prospective pupils from the College on request. Large print or other accessible formats can also be made available.

Every complaint or suspicion of abuse from within or outside the College will be taken seriously and action will be taken in accordance with this policy.

We believe that the welfare of children is the highest priority and that it is the responsibility of everyone 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 this Child Protection Policy (CPP).

This CPP is a comprehensive set up of guidelines that define our commitment to safeguard children from harm and abuse. This helps to create a safe and positive environment for children and lays down the roles and responsibilities of all stakeholders.



Scope of Child Protection Policy (CPP)

1. The School follows a 'zero tolerance' approach to any act of violence, bullying, sexual abuse etc., in the school premises, school buses and such extended environments, as defined in this CPP.
2. This CPP covers abuse, harassment, and offences that can occur in a school campus and in premises under control of the Institution, as well as extended environments including the modes of transport.
3. This CPP comprises key elements to guide behaviour and practices of personnel and individuals in relation to the School such as prevention of abuse, complaint mechanisms and response, recruitment, disciplinary action for misconduct, monitoring and review etc.

Applicability

This CPP aims to protect students and applies to all School Staff/ Teachers/ Visitors/ Parents/ Visiting Faculty/ Third Party Service Providers who directly interact with students.

Conformity with Laws in force in India

1. This CPP is guided by the existing legal frameworks of child protection in India and the ratified international conventions.
2. This CPP is in conformity with all relevant laws in force in India such as Protection of Children from Sexual Offences Act, 2012, The Indian Penal Code, 1860, The Juvenile Justice (Care and Protection of Children) Act, 2015 and The Information Technology Act, 2000, The Right of Children to Free and Compulsory Education Act, 2009 and shall include any subordinate or delegated legislation made from time to time.
3. 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.
4. In the event this CPP does not cover any legal compliance requirement on the subject of child protection, the same shall be deemed to be a part of this CPP and the School shall be duty-bound to follow the same.
5. Any modifications made to the relevant laws from time to time such as amendments, substitutions etc. shall be deemed to be a part of this CPP and the School shall be duty-bound to follow the same.
6. Any term not defined in this CPP, shall bear the meaning given to it under the relevant applicable law.

Definitions

1. "Child" means a student admitted and enrolled in the School located anywhere in India;
2. "Child Abuse" is any deliberate behaviour or action which includes all forms of physical, emotional, online and sexual abuse that results in actual or potential harm to the child's health, development or dignity and endangers child safety;
3. "Cyber Bullying" means any form of intimidation or harassment, using a computer, communication device or computer network or the Internet;
4. "Mental Harassment" means and includes insults, ridicule, humiliation, name-calling and repeated threats to cause physical violence to a child;



5. "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;
6. "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;
7. "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.
8. "Sexual Assault" has the same meaning as assigned to it in Section 7 of POCSO Act, 2012;
9. "Sexual Harassment" has the same meaning as assigned to it in Section 11 of POCSO Act, 2012;
10. "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.

Offences and other Acts covered under this CPP

- I. 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.

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.

Complaint of an Offence

1. A complaint in writing by a student 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) any teacher



- b) Counselor
 - c) School Principal/Head of Seniors
 - d) Child Protection Officer
2. In the event the complaint constitutes an offence under POCSO Act (The Protection of Children from Sexual Offences Act, 2012), the same shall be forwarded to the Student Safety Committee and the procedures as established by the Student Safety Committee shall be followed.
 3. With respect to offences under POCSO, the School is duty bound to report the offence to the concerned law enforcement agencies in terms of Section 19 and Section 21 of the Act.
 4. 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, the School shall forward the same to the concerned law enforcement agency.
 5. The School will cooperate with the concerned law enforcement agencies inquiring into and/ or investigating complaints of penal offence(s).
 6. In the event the complaint does not fall within sub-clause 2 and 4 above, the complaint shall be dealt with by the Disciplinary committee and procedures as established by the Disciplinary Committee shall be followed.

Complaint Redressal Mechanism for Child Sexual Abuse Cases

1. If a person has knowledge that an offence has been committed or belief or apprehension that an offence is likely to be committed must report to any member of the Child Protection Committee (CPC) or any senior member of the School.
2. Such persons as stated above should not conduct their own investigation or look into the matter. There should not be any delay in reporting the matter to the Child Protection Committee (CPC) or any senior member of the School.
3. The Child Protection Committee must hold a meeting and immediately report the matter to the local police/ Special juvenile police unit/ Child helpline 1098/ State commission for protection of child rights.
4. Minutes of the meeting should be maintained and signed by all members. A copy of the same should be shared with the authorities.
5. When the matter is closed or withdrawn for any reason whatsoever, the School must prepare a post incident report/ closure report.

Code of Conduct

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

Code of Conduct for the Staff

1. Be conscious of and respect the privacy and dignity of each and every child.
2. Be visible and not in a secluded place, while in contact with children at the workplace.
3. Respect and encourage children's voice and views.



4. Educate children about their rights, issues of abuse, neglect and exploitation.
5. Be affectionate, caring and understanding to the requirements and needs of the children.
6. Be responsive in case any special need of the child arises such as health issues or emotional support.
7. Have a sense of accountability, in order to deter any poor practice or potentially abusive behaviour.
8. Immediately report any suspicious behaviour/suspected occurrence of abuse. It is a criminal offence to conceal or abet incidents of child abuse, and is mandatory to report such offences.
9. Treat children with respect regardless of race, color, gender, language, religion, nationality, ethnicity, disability or other status.
10. Comply with all relevant Indian and State legislation, including all child related laws.
11. Contribute to creating a safe, nurturing and empowering environment for Children.
12. Take Children's beliefs and concerns seriously and foster their personal development.
13. Refrain from concealing or abetting incidents of Child Abuse.
14. Report to the concerned authorities all incidents of sexual offences as is mandatory under Section 19 of the POCSO Act, 2012.
15. Follow the 'two adult rule' as far as possible, which means making sure that whenever individual interactions, training, education or medical treatment is taking place in the course of, or as a result of activities in the School, another Employee is present or nearby, so that both can be seen by the second adult Employee.
16. Refrain from smoking or consuming alcoholic drinks, or using any prohibited substances while on School premises or in the presence of Children.

It is NOT appropriate for staff to

1. Spend excessive time alone with children away from others.
2. Physically assault or physically abuse the child.
3. Use language that is discriminatory, abusive or hurtful to the child.
4. Develop relationships with the child that could in any way be deemed exploitative or abusive.
5. Store obscene / pornographic material (photographs, video clips) on their mobile phones and showing to children.
6. Browse, publish or transmit material in any form which depicts children engaged in sexually explicit act or conduct.
7. Create text or digital images and/or collects, seeks, browses, downloads, advertises, promotes, exchanges or distributes material in any electronic form depicting children in obscene or indecent or sexually explicit manner.
8. Show or talk of content that is sexual in nature or take photographs of children.
9. Behave physically in a manner which is inappropriate or sexually provocative.
10. Condone and/or participate in behaviour of children which is illegal, unsafe or abusive.
11. Use physical punishment on children.
12. Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form



of emotional abuse, discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.

13. Stigmatize or humiliate a child.
14. Act in a manner that puts the child at risk.
15. Engage in any sort of physical contact with a child that may make the child or an observer feel uncomfortable, or that may be seen by an observer to be violating boundaries.
16. Engage in any communication with a child within or outside of school duties, that may make the child uncomfortable or that may be seen by an observer to be violating boundaries.
17. Conduct their own investigation into allegations or suspicions of potentially illegal or inappropriate behaviour – it is an employee's duty to report the matter to his/her Principals/Child protection coordinator.

It is important to note that whether or not a particular behaviour or action constitutes inappropriate behaviour will be a matter determined by the organization having regard to all of the circumstances, including past behaviour, and allegations or suspicions related to such behaviour.

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

Prevention of Ragging and Bullying

1. To prevent ragging in the school campus/ premises or school buses, the Principal and the teaching staff should interact with students especially freshers and apprise them of their rights as well as an obligation to fight against ragging apart from complaining about the same and to generate confidence in their mind that any instance of ragging to which they are subjected or which comes in their knowledge should forthwith be brought to the knowledge of the Principal and/ or staff of the School and that such complaints shall be promptly dealt with while protecting the complainants from any harassment by the perpetrators of ragging.
2. The Principal and other senior members of the School staff should conduct meetings of teachers, parent(s) and students collectively or in groups, on bi-annual basis, to spread awareness that ragging is a reprehensible act.

Recruitment

1. The School shall undertake child safeguarding measures while appointing new staff and orient them on this CPP.
2. 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 ability to safeguard and promote welfare of children. The School clearly talks about the knowledge of Child Protection to the interviewee.
3. Every member of the staff is given an ID Card which he/ she must carry all the time mandatorily.
4. The School officially applies for police verification and background checks of the applicants.



5. All newly selected candidates must also provide a signed affidavit to the educational institution that they have not been accused of offence under the POCSO Act, 2012 and JJ Act, 2015.
6. Regular training programs on all aspects of child safety are conducted by the School.
7. All staff members are continuously made aware of "Do's and Don't(s) in School Premises" which covers principles such as 'No touch policy', etc.
8. 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 all staff members.
9. As a part of preventive measures for safety and security of students, 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.
10. All school buses have qualified drivers and conductors. The School strictly adheres to the Supreme Court Guidelines and RTO and other school bus safety regulations.

Training and Sensitization

1. The School shall conduct regular orientation and sensitization training programmes with Employees, Children and partners associated with the School.
2. Orientation on this Policy for all new Employees shall be held at the earliest and no later than 6 months from the date of joining of new Employees.
3. Training programmes for teachers and staff that, *inter-alia*, cover emotionally disturbed students, counselling of students and preparing children for meeting challenges of adolescence shall be conducted every year.
4. Awareness on personal hygiene, care and guidance to female children through seminars and discussions shall be provided every year and, when relevant, a female matron shall be appointed in each boarding house/dormitory for girls.
5. A written record of all orientation sessions and training held in the School and attended by Employees and Children must be maintained by the Human Resources Department of the School. The objective of such trainings will be to:
 - (a) Strengthen capacity of all Employees to help them safeguard and manage this Policy and strengthen its implementation.
 - (b) Strengthen their insights about what constitutes Child Abuse and child protection violation, how to identify signs of Child Abuse and reporting such abuse.
 - (c) Build their capacities on crisis management and dealing with emergencies.
 - (d) Deepen their perspective about national and international laws and regulations, particularly the POCSO Act and the JJ Act.
 - (e) Help them understand and internalize their responsibilities towards Children, and the conduct and procedures to be followed to ensure protection of Children.



Safety Guidelines for Online Learning

Guidelines for Teachers

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

Guidelines for Students

1. Students must use their full name and an appropriate profile picture on any platform when interacting with other students and teachers.
2. Students must not share personal information about themselves or anyone else on any platforms.
3. Students must not share images, videos or audio clips with personal or inappropriate content of themselves or anyone else.
4. Students must inform their parents/guardians about any and all online sessions and interactions.

Infrastructural Compliance

Premises used by Children are required to meet certain infrastructural compliances. The School shall ensure compliance with the following:

- (a) Installation of a Children's suggestion and complaint box in the School.



- (b) Installation of CCTV cameras in all conspicuous places in the School, particularly in common areas where frequent interface between children, staff and visitors takes place, and in residential facilities, provided that the CCTV camera installation does not undermine the right to privacy, dignity and self- respect of the Child.
- (c) Separate washrooms for girls and boys, keeping in mind age segregation.
- (d) Special washrooms for children with disabilities, keeping in mind age and gender segregation.
- (e) Separate residential facilities for boys and girls with separate facilities for children of different age groups.
- (f) Special aids and appliances for children with disabilities which facilitate and promote their safety and security.
- (g) Well-lit corridors/bathrooms and halls with power back up.
- (h) Provision for an emergency phone with direct line to the child helpline number '1098' in all residential facilities in an area which is easily accessible to children and installed in a manner that makes it easy to use by children of varied age groups, including children with disabilities.

Continuous Assessment and Monitoring of CPP

1. This CPP shall be comprehensively assessed annually so as to improvise the same in line with contemporaneous society.
2. An audit called "Child Safety Checklist" shall be conducted annually by a committee constituted by School Management. The audit shall be a critical analysis and evaluation of the safety and security of children at large studying in the school. An audit report shall be prepared and published annually.
3. 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 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 the School.
4. The School has presently allocated responsibilities of protection of its students to the members of the Student Safety Committee.
5. This CPP may be revised or amended from time to time, by the Management of the School or by a committee appointed for this purpose.

Dissemination of this CPP

1. A copy of this CPP is given to all staff members and they shall acknowledge that they have received, read, understood and will abide by the CPP.
2. This CPP is also uploaded on the School's website.



Appendix I
INITIAL RECORD OF CONCERN Form

(To be completed by the adult who is the first point of contact by the child and then passed on to the
Child Protection Officer/DSL)

Child's Name:				
Date of Birth:		Child's School:		
Child's Address:				
Context – WCIP Teacher:				
Male/ Female / Other:	Ethnic Origin:	Disability:	Religion:	
Name of the alleged offender:				
Date of Birth of the alleged offender:		Nationality of the alleged offender:		
Name of parents/guardian of the alleged offender:				
Address of parents/guardian of the alleged offender:				
Record of initial discussion:		Date of referral:	Reported by:	



Who has the information been shared with?		
Initial action points:	Agreed timeline:	Action by:
Nature of the disclosure: Please include here: - Date, Time, Place of disclosure: - What did you observe? - Was someone else there when the child made the disclosure? Indicate name and position/relationship with the child.		

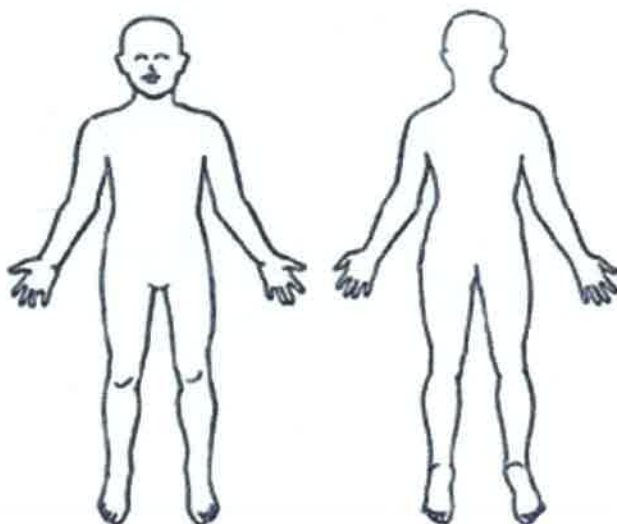
**Nature of the concern:**

Please include here:

- Date, Time, Place of concern:
- What did the child say or do?
- Was there someone else with the child when the incident took place? Indicate name and position/relationship with the child.

Additional Information:

(Details of any reported and/or visible physical injuries)



Please indicate any markings on the body outline. Please, do not take any pictures, audio visual recordings, and do not ask the child to reveal any injury beneath any clothing.



Report on the action taken: (including any information regarding the involvement of profession agencies with the family, and the extent to which both the child and the family are aware of steps already taken.)	Date:	Action by:
Further action points:	Date:	Action by:
Reported by:		
Your Role / Responsibility / Position:		
Date and Time of this Recording:		
Initial Form passed on to:		
Child Protection Officer/DSL Yes / No		



College contact details:

Your Signature:

Date:



Appendix 2
INITIAL RECORD OF CONCERN Form

(To be completed by the Child Protection Officer/DSL)

Child's Name:				
Date of Birth:		Child's School:		
Child's Address:				
Context – WCIP Teacher:				
Male/ Female / Other:	Ethnic Origin:	Disability:	Religion:	
Record of initial discussion:		Date of referral:	Reported by:	
Who has the information been shared with?				
Initial action points:		Agreed timeline:	Action by:	



Report on the action taken: (including any information regarding the involvement of profession agencies with the family, and the extent to which both the child and the family are aware of steps already taken)	Date:	Action by:
Further action points:	Date:	Action by:



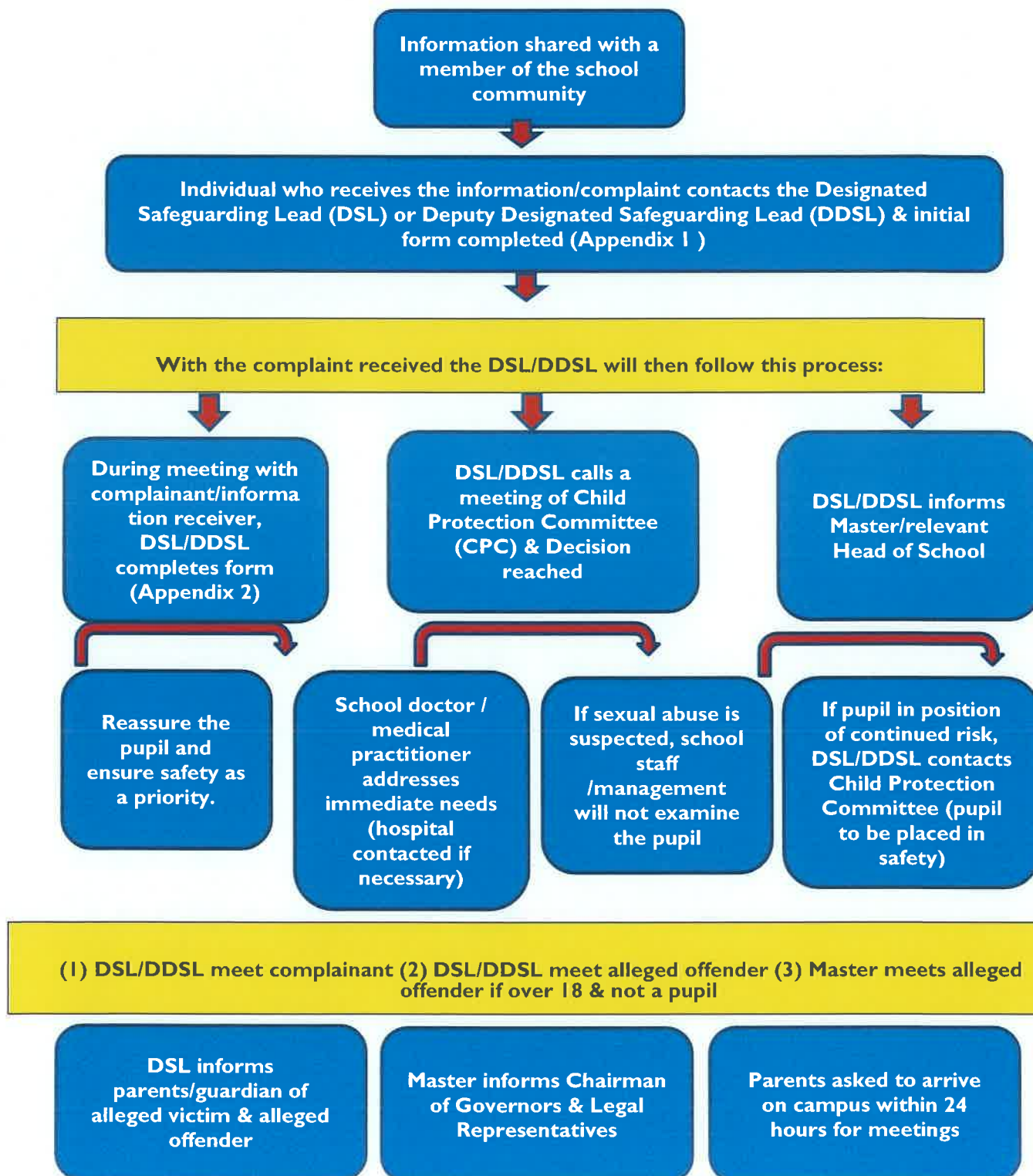
Your Signature: Date: (This confidential document needs to be kept with the Initial Record of Concern Form)		



Appendix 3:

INTERNAL PROCESS FOR REPORTING SEXUAL ABUSE/ASSAULT/HARASSMENT (for those Under 18)

Following a report/complaint:





Appendix 4

The interview	Don't Ask	Can Ask
Must not contain the answer	Did it happen to you at x place? Was X there? Did he/she tell you not to tell anyone.	Where did it happened? Who was there? What was said to you?
Must not contain a choice of answers	Was he/she wearing X type of clothing? Were you sitting up or lying down? Were you scared, angry or sad?	Tell me what he/she looked like? Where were you in the room? How did you feel?
Must not contain explicit details of alleged abuse	Did he/she make you do X thing? Which finger did he/she use to hurt you?	What did he do next? Then What happened? What was it that hurt you?
Must not contain the interviews assumptions	We are going to ask you some questions as to what happened to you: What kind of car did you go in? Was there a bed in the room? Tell me about your mom's house?	How did you get there? Can you tell me what was in the room? Tell me where your mom lives?



Appendix 5: Tips for counsellors and Teachers

(Reproduced from the Child Protection Handbook for Teachers, Administrators and Board Members by ASIA (The Association of International Schools in Asia))

- Do not let a child swear you to secrecy before telling you something. You may need to report, which the child will view as breaking your trust with them.
- If a child asks to speak with you, try to find a neutral setting where you can have quiet and few interruptions.
- Do not lead the child in telling. Just listen, letting him/her explain in his/her own words. Don't pressure for a great amount of detail.
- Respond calmly and matter-of-factly. Even if the story that the child tells you is difficult to hear, it is important not to register disgust or alarm.
- Do not make judgmental or disparaging comments about the abuser - it is often someone the child loves or with whom he/she is close.
- Do not make promises to the child that things will get better.
- Do not confront the abuser. If the child does not want to go home, this should be considered an emergency. Report and handle immediately by contacting your school-based Support Team or the Community-based Multidisciplinary Team. Do not take the child home with you!
- Respect the child's confidence. Share with the Child Protection Team, but limit information from and with other staff.
- Explain to the child that you must tell someone else to get help.
- Try to let the child know that someone else also will need to talk with /her and explain why?
- Empower the student by as much as possible allowing the child a part in the process.
- Please note: teachers are not investigators. Your role is to listen and respond to disclosures in order to determine the next step for students to get the help they need. When appropriate, a request for an investigation must be completed.
- Case management standard reporting form (usually compiled by counsellor or case manager) should include:
 - Reporter's relationship to the child/victim.
 - Child's name, gender, age, address.
 - Information on parents/guardians.
 - Information about the reporter and school.
 - Nature and extent of injuries/maltreatment.
 - How reporter became aware (first-hand witness?).
 - Description of action taken (if any).
 - Other information that may be helpful.
 - Name of perpetrator, siblings at home, prior evidence.
 - Information about the cause, and those responsible.



Appendix 6: Teachers / Staff Undertaking

I will:

- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Never be alone with children and/or youth at school activities without another adult being notified.
- Use positive reinforcement rather than criticism, competition, or comparison when working with children and/or youth.
- Maintain appropriate physical boundaries at all times and touch children – when necessary – only in ways that are appropriate, public, and non-sexual.
- Comply with the mandatory reporting regulations of [name of school] and with the [name of school] policy to report suspected child abuse.
- Cooperate fully in any investigation of abuse of children and/or youth.

I will not:

- Touch or speak to a child and/or youth in a sexual or other inappropriate manner.
- Inflict any physical or emotional abuse such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading children and/or youth.
- Smoke or use tobacco products, or possess, or be under the influence of alcohol or illegal drugs at any time while working with children and/or youth.
- Give a child who is not my own a ride home alone. Accept gifts from or give gifts to children or youth without the knowledge of their parents or guardians.
- Engage in private communications with children via text messaging, email, Facebook, Twitter or similar forms of electronic or social media except for activities strictly involving school business.
- Use profanity in the presence of children and/or youth at any time.
- I understand that as a person working with and/or providing services to children and youth under the auspices of [name of school], I am subject to a criminal history background check. My signature confirms that I have read this Code of Conduct and that as a person working with children and youth 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 removal from [name of school].



SAMPLE BEHAVIOUR POLICIES THAT WILL PROTECT TEACHERS FROM FALSE ALLEGATIONS:

- Avoid situations in which you are alone with a child. This includes not transporting youngsters alone in your car. When it is necessary to speak privately with a child, find a space out of earshot, but within sight of others for your conference.
- The privacy of children in situations such as toileting, showering and changing clothes should be respected. When it is necessary to supervise children in these situations, at least two adults should be present and intrude only to the extent that the health and safety of the children require. Adult volunteers should preserve their own privacy in these situations also.
- Avoid touching areas that are normally covered by swimming suits; breasts, buttocks, and groin.
- When hugging is appropriate, hug from the side over the shoulders, not from the front. Sexual jokes, comments of a sexual nature, kissing, sensual massages or sexual gestures are not appropriate behaviour for an adult staff member or volunteer.
- When volunteering to supervise overnight activities, adults should not share sleeping quarters with children other than their own.
- Revealing personal information about one's sex life by an adult volunteer or staff member is never appropriate.
- Do not use corporal punishment in any form.
- It is the adult's responsibility to set and respect boundaries. When a child attempts to involve an adult in inappropriate behaviour, the adult must reject the overture.



Appendix 7: My Concern Guidance

My Concern Entry Guidance and Levels of Need

What should NOT go on MyConcern?

- Any low level pastoral incident/concern – speak to HM / tutor first (HM's and tutors should record these concerns on OneNote)
- Any safeguarding concerns about a member of staff – speak/communicate with DSL or Deputy DSL or anything which you are 'self-reporting'

What should you report on MyConcern?

Any issue which concerns you about a pupil or an incident you have witnessed. This might include:

- Concerns about a pupil being anxious, depressed, showing different behaviour – a subtle change over time or a rapid change
- A significant pastoral concern such as a friendship difficulty, inability to form good relationships with peers.
- Any safeguarding concern – mental health issues, self-harm, suicidal ideation, eating disorder, abuse, drugs, inappropriate behaviour, bullying and child-on-child abuse of any sort, alcohol use, inappropriate use of online technology including accessing pornography, gambling, criminal activity of any sort etc
- Home issues – parental divorce, significant illness, parental mental health concerns, lack of supervision, family member in prison
- Witnessing or overhearing nasty comments about a pupil/seeing another pupil being unkind to another
- A safeguarding “event” – finding pupils in a compromising situation, a member of the public trespassing or accessing area of the College that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw)

How to report a concern

- Click on the MyConcern icon on the dashboard
- Click on “Report a Concern”
- Fill in the details on the “Report a Concern” page, remembering these important points:
- The concern summary should be brief – a couple of words only. Eg. “Injury to right leg”; “Bullying”; “Possible drugs use”
- **The concern should ALWAYS be sent to the DSL. They are the gatekeeper of all cases and will assign the case to others where necessary**
- The details of the concern box should contain ALL details, specifically names, times, places – as much detail as you have about the pupil / event /situation
- Action taken – what you did or are doing; this might just be as simple as “reporting the incident on MyConcern”; it might also include more detail – a care plan, referrals to outside agencies (eg a counsellor) – whatever action that has been taken which is relevant



- Attachment – you can attach documents to the entry. It might be a copy of some hand written notes, a piece of work that a pupil has written that you are concerned about, something which you have found (eg a note / piece of paper which is concerning)
- When you are happy, press “submit concern”

How to update a concern

- Click on the MyConcern icon on the MyDay dashboard
- Click on “Update a Concern”
- Click on the concern that you wish to update
- Click Chronology tab
- Click on “Add Concern Update” and fill in the details
- Attach any files which might need to be added (on the files tab)

Being a team member and being assigned tasks

You may be asked to be a “team member” for a case. This will mean that you can contribute to case management or may be assigned tasks. This is most likely to be:

- Head of School(s) (almost always)
- Tutors (sometimes, depending on the case)
- Other pastoral staff (sometimes)

You may be assigned a task. For example, “call up parents and ask them to come in for meeting” or “Head of School to update case on the 31/01/24”. If a task has been assigned, you will get an email advising you what you need to do. When the task meets the deadline, you will be sent a reminder email to complete the task.

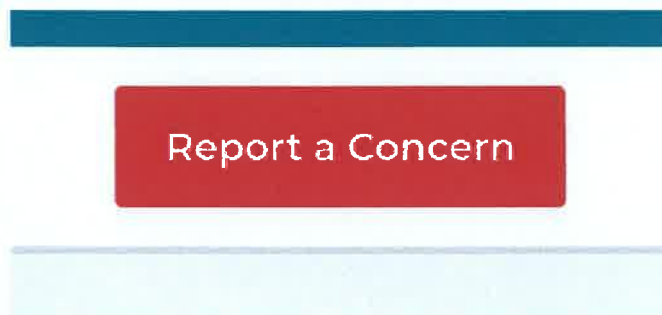


REPORTING A CONCERN FLOWCHART

CLICK



CLICK



FILL IN THE PAGE

Report a Concern

Name(s) of Pupil(s)	Please name the Pupil(s) subject of this concern and any other Pupil(s) you want linked to it
Concern Summary	e.g. Injury – Megan arrived at School this morning with a badly bruised right eye.
Send Concern to	Please Select a Notification Group
Concern Date/Time	
Details of Concern	There is no need to repeat the Concern Summary.
Location of Incident	Not Applicable
Action taken	
Attachment	Browse...

Please attach any media that is relevant to this concern.

PRESS SUBMIT CONCERN

Use the guidance on the staff information sheet to complete the form. Always remember to send the concern to the DSL.



UPDATING A CONCERN FLOWCHART

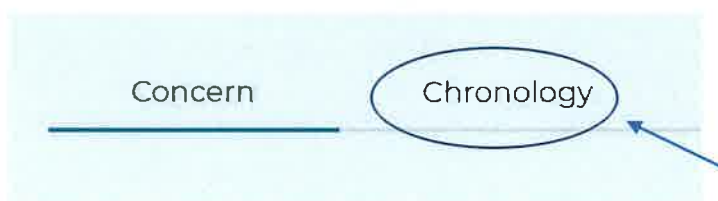
CLICK ON 'MY CONCERNS'



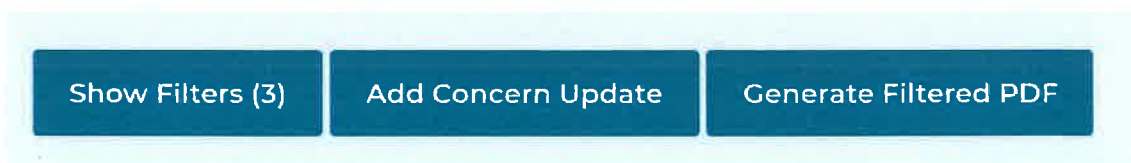
Go to the relevant concern you want to update

Concern ID	Concern Summary	Class	Categories	Reported At	Associated People	Working Group	Status
2017-0533	Isagen came into college with a nasty bruise on her face		None	18/1/17 17:10	JP Megan Davies JP Sophie Davies JP Gujeran Davies	DBLe	Open
2017-0538	Alex came into school this morning with a bruised left eye		None	1/2/17 10:42	JP Alex Gasser	DBLe	Reopened
2016-9202	Alex and Claire were fighting in the corridor before school today		None	29/7/16 16:45	JP Alexander Burton JP Claire Abbott	Openness Campus	Closed

Click Chronology



Click "Add Concern Update", fill in the relevant information and click on "add update" when you have finished



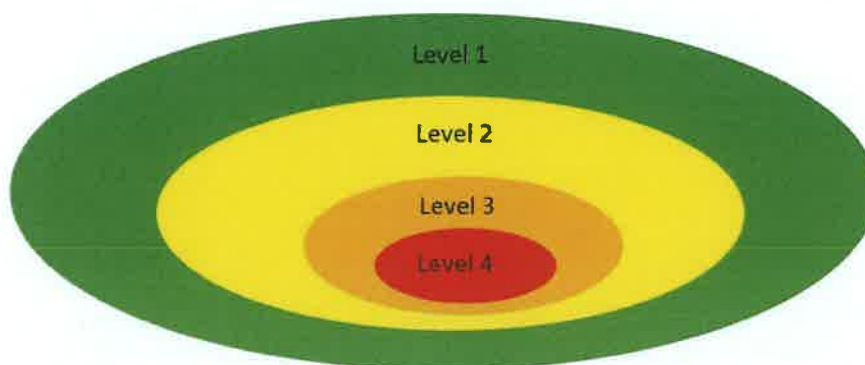


MyConcern Levels of Need

Levels of need

After an entry has been made onto MyConcern, a level of need will be assigned to the pupil associated with the case. Levels of need may move, depending on the pupil's circumstances. When a level of need is altered, the rationale behind that decision will be recorded on MyConcern.

The initial level of need will be decided by the DSL, based on the criteria listed below.



Level	Needs of the pupil	Examples of support	Other comments
Low level Pastoral concern (1)	This pupil may just need keeping an eye on to ensure that a low level concern does not develop into a larger issue. The team around the child (usually Tutor, class teacher, DSL) will speak about the pupil at their weekly meetings to ensure that there have been no further developments. Examples may be initial concerns regarding: Disordered eating or weight loss	The support offered will be by internal College staff and professionals. The pupil should be offered support by relevant individuals. This might be: - Tutor - Counsellor - Head of Seniors - Health Centre Team The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.	Involved staff should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least monthly, a tutor should provide a summary of the pupil on MyConcern so that their progress can be recorded. This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.



Level	Needs of the pupil	Examples of support	Other comments
	• Low level mental health or behaviour changes • Family circumstances • SEN or academic issues • Friendship / relationship issues • Poor sleep	The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM.	

Higher level Pastoral concern (2)	This pupil will need a close eye keeping on them and is likely to need access to an additional service, usually provided by the College, but not exclusively so. They may be vulnerable individuals who are showing early signs of a failure to thrive and flourish, either in College or at home. Additional help is needed in order to enable them to fulfil their potential. This pupil will need close monitoring and there may be higher level concerns about: • Disordered eating or weight loss • Mental health or behaviour changes • Family circumstances (eg divorce) • Significant bereavement • Significant ill health within the family • SEN or academic issues • Friendship / relationship issues • Bullying • Sexual harassment • Online safety / sexting • Child-on-child abuse • Attendance at College • General social issues / social anxiety • Gender issues	The support offered will usually be by internal College staff and professionals. The pupil should be offered support by relevant individuals. This might be: • Tutor • Counsellor • Relevant Head of School • Health Centre Team • DSL The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of. The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM. External services may be accessed, if appropriate. These might include: • Psychologist • SEN Support (eg an educational psychologist) • An external therapist • Education Welfare Service	The pupil will be discussed in detail at a pastoral meeting. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered. It is likely that parents will be aware that there are pastoral concerns. A tutor should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least monthly, a tutor should provide a summary of the pupil on MyConcern so that their progress can be recorded. This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people. If appropriate relevant pastoral information will be shared with SLT and the Master.
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Intensive support and monitoring (3)	This pupil will require significant support due to complex and high level pastoral concerns. Often several areas of professional support will be required. The pupil is likely to be dealing with multiple long term issues and they need support from individuals to ensure that the impact of these significant issues are minimised as much as possible. Issues likely to be within this category of concern are: • Eating disorder, significant weight loss • Mental health – severe anxiety, depression, suicidal ideation • Diagnosed mental health illness, such as OCD, Bipolar or Schizophrenia • Repeated online safety concerns, sexting • Repeated alcohol offences • Concerns over illegal substances • Significant bullying which is longer term • Dangerous behaviour • Serious physical illness / disability • Gambling or gaming addiction • Serious sexual harassment • Child-on-child abuse • Gender transition / reassignment • Risky sexual behaviour • Death of a parent / sibling	The support offered will include both internal and external professionals and agencies. This may include: • Counselling • An appointed (College) Psychiatrist • External therapists • DSL and Head of School involvement • Education welfare service • External Indian agencies The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of. This pupil will be put onto a College welfare plan which will be overseen by the DSL and specialist tutoring support will also be offered and discussed.	The pupil will be discussed in detail at a weekly pastoral meeting. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis of any risk factors and vulnerabilities will be considered. The welfare plan will be reviewed fortnightly. It is likely that parents will be aware that there are pastoral concerns. Pastoral leaders should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least fortnightly, a tutor should provide a summary of the pupil on MyConcern so that their progress can be recorded. This will enable the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people. The Master and the SLT will be aware of the pupil's needs. The Safeguarding Governor will be informed. At all times, and if necessary, the POCSO Act 2012 guidance will be followed, in accordance with Indian regulations.
Significant, serious and urgent	This pupil is likely to be living in circumstances where they are suffering or are likely to suffer	The support offered will include both internal and external professionals and agencies to help children and	The pupil will be discussed in detail at weekly pastoral meetings. Staff will ensure that an appropriate team around



Level of Need (4)	significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention. The pupil may be accessing more specialised services such as residential care or hospitalisation. Issues likely to be in this category of concern are: • In-patient care for an eating or mental health issue • Suicide attempt or suicidal ideation (requiring psychiatric evaluation) • Psychiatric assessment for an acute mental health concern (such as psychosis) • Abuse – physical, sexual, emotional, neglect • Honour based abuse: FGM, Forced Marriage • Sexual violence or assault • Radicalisation • Absconding, no idea of whereabouts • Homelessness In this level of need, a referral will have been made via the POCSO 2012 Act, following all the guidance laid down in that Act & in the Appendices 3-5 in this policy document.	their families cope with very significant and long term care. This may include a combination of: • External agencies • Therapists / medical professionals within an inpatient setting • Counselling • College / external Psychiatrist • External therapists • DSL and Head of School involvement • Education welfare service The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of. This pupil will be put onto a College welfare plan which will be overseen by the DSL and specialist tutoring support will also be offered and discussed.	the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered. The welfare plan will be reviewed weekly. Parents will be aware that there are pastoral concerns and will have regular contact with the pastoral leaders and also the DSL. A Child protection plan may be in place and will be monitored and overseen by the DSL. The relevant tutor should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least fortnightly, a tutor should provide a summary of the pupil on MyConcern so that their progress can be recorded. This will enable the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people. The Master and the SLT will be aware of the pupil's needs. The Safeguarding Governor will be informed.
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This policy is reviewed and updated (at least annually) by the Designated Safeguarding Leader of WCI Pune.

Mr. Nigel James Fossey MBE
Master
Wellington College International Pune
August 2026