

POLICY FOR PROTECTION OF CHILDREN FROM SEXUAL OFFENCES




REGISTRAR
ATLAS SKILLTECH UNIVERSITY

POLICY FOR PROTECTION OF CHILDREN FROM SEXUAL OFFENCES

1. Vision and Mission of Atlas Skilltech University

The Vision of Atlas Skilltech University (“**University**”) is for all children to have a happy and nurturing childhood, leading to good citizenship. Our mission is to promote an academic environment that protects and nurtures children enabling them in realizing their full potential.

2. Statement of Purpose

The Government of India, in line with Article 15 (3) of Constitution of India and the United Nations Convention on the Rights of the Child (acceded by India on 11th December, 1992), has brought in a special law, namely, the Protection of Children from Sexual Offences Act, 2012 (“**POCSO Act**”) and Protection of Children from Sexual Offences Rules, 2020 (“**POCSO Rules**”), both collectively referred to as the “**POCSO Law**”. The POCSO Law is comprehensive and provides for protection of children from offences of sexual assault, sexual harassment and pornography, while safeguarding the interests of children at every stage of the judicial process by incorporating child-friendly mechanisms. The offenses under the POCSO Law have been defined in detail below (more specifically in Clause). The punishments attached to these offenses have also been provided below (more specifically in **Annexure I**).

The University firmly believes that compliance with the POCSO Law and providing for appropriate prevention as well as redressal mechanisms are extremely important to fulfil the Vision of the University which is to provide space for children to have a happy and nurturing childhood. Keeping the above Vision and its Commitment in mind, the University has formulated this Policy for Protection of Children from Sexual Offences (“**Policy**”). The purpose of this Policy is to enable an environment that ensures best interests and welfare of every child as a matter of paramount importance at every stage through healthy physical, emotional, intellectual and social development; encourage free and open expression of views; promote meaningful interaction among children without feelings of discrimination or fear; and ensure children’s safety and protection from any intentional and unintentional physical, verbal, emotional or sexual violence/abuse / assault, exploitation and maltreatment.

The University further believes that in line with this Policy, every child connected with the University must be protected from sexual offenses and there shall be no discrimination among the children of any kind on the basis of their or their parents’ or their legal guardian’s age, colour, culture, gender, sexual orientation, nationality, ethnic origin, community/race, caste, colour, ancestry, marital status, disability, religion or language spoken.

3. Scope

This Policy is gender-neutral and shall be applicable for the benefit of all children who attend the University and / or are connected with the University in any manner. This Policy covers prevention, reporting and redressal of concerns related to sexual offences (defined below) against children (defined below) only. For redressal of any concerns against children which are other than sexual offenses (such as bullying, neglect, corporal punishment Further, if there are any concerns related to sexual harassment of adults, kindly refer to our POSH Policy.

4. **Applicability**

The Policy is applicable to:

- a) All University Employees.
- b) All University Students.
- c) All third parties / visitors, including children, connected to the University who may come in Direct or Indirect contact with children at the Campus.

All the above terms have been defined below in detail. All the above shall be collectively referred to as “**University Stakeholders**”.

5. **Definitions**

- a) **Accused:** Anyone against whom a complaint of Sexual Abuse against a Child has been filed / reported.
- b) **Child / Children:** A Child means any person, irrespective of their gender, under eighteen (18) years of age.
- c) **Student:** Student means a person duly admitted and pursuing a programme of study either through regular mode or distance mode, including short-term training programmes in a University. Provided that a student who is in the process of taking admission in the University, although not yet admitted, shall be treated, for the purposes of this Policy, as a student of the University, where any incident takes place against such student. Provided that a student who is a participant in any of the activities in the University, however, is enrolled in any other place other than the University, such student shall be treated, for the purposes of this Policy, as a student of this University if any incident is reported to have taken place against such student.
- d) **Employee:** Employee means any person employed by the University for reward or wage or in any other campus anywhere in the world in which this Policy is applicable, including any teaching or non-teaching staff, temporary, part-time, honorary, employee, interns, volunteers, teacher assistants, research associates, research assistants, interns, all kinds of support staff, whether employed or not, including those involved in field studies, projects, short-visits and camps, maintenance staff by whatever name called and would include employees employed on a casual or project basis and also employed through contractor or otherwise, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- e) **Workplace:** Workplace means all places where University’s work is carried out. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually. For example:
 - (i) All offices or other premises where University’s business is conducted
 - (ii) All University related activities performed at any physical or virtual site
 - (iii) Any social, business or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations

- (iv) Any alleged act committed during or outside of office hours / class hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, on any social media platform or through any other electronic communication etc.
- (v) Any communication of sexual nature on any social networking website during or outside of office hours / class hours
- (vi) Any place visited by Employee or Student or arising out of or during the course of association with the University, including transport services provided by the University for undertaking such journey, audio/video conferencing applications or any other communication related tools/applications. For example, Employees or Students who are on overseas programs and trainings in course of association or employment with the University or while being a Student at the University.

f) Campus: Campus means the location or the land on which the University and its related institutional facilities like libraries, laboratories, lecture halls, residences, halls, toilets, student centres, hostels, dining halls, stadiums, parking areas, parks-like settings and other amenities like health centres, canteens, Bank counters, etc., are situated and also includes extended campus and covers within its scope places visited as a student of the University including transportation provided for the purpose of commuting to and from the University, the locations outside the University on field trips, internships, study tours, excursions, short- term placements, places used for camps, cultural festivals, sports meets and such other activities where a person is participating in the capacity of an Employee or a Student of the University.

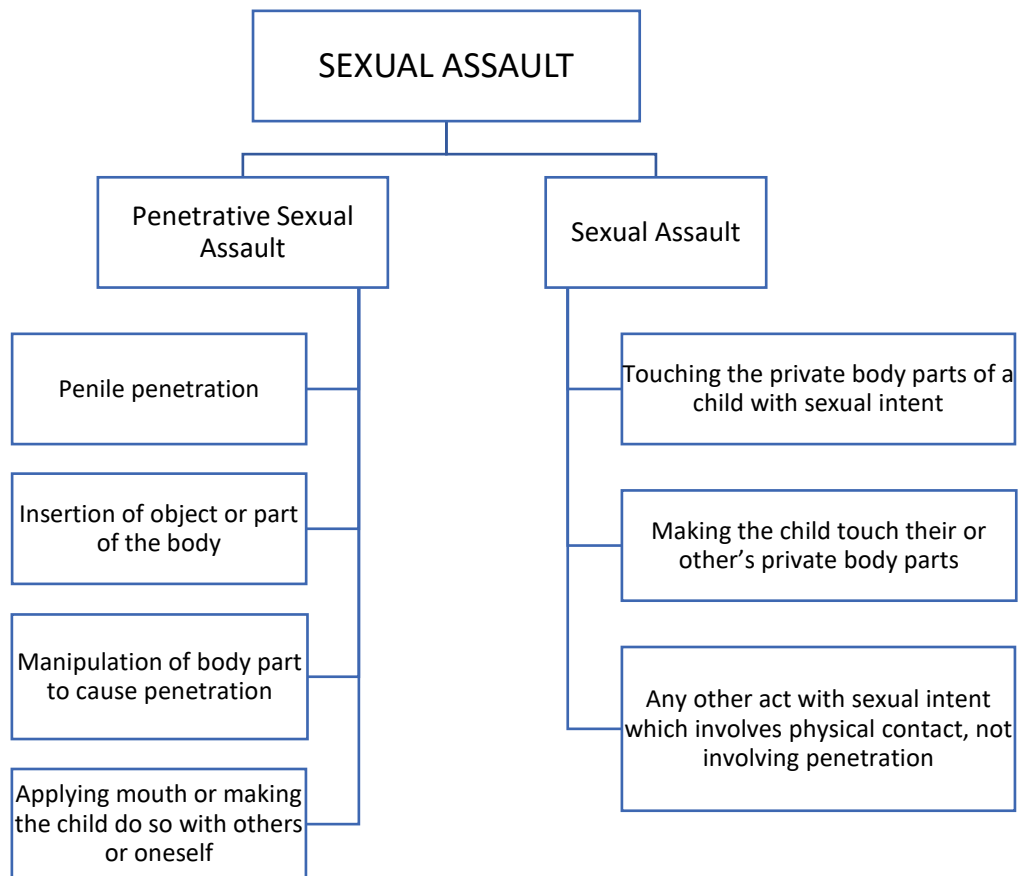
Campus would also include a programme of study either through regular mode or distance mode, including short-term training programmes in a University using any mode of communication. Online platforms, in such cases will fall under the definition of Campus. For the purposes of this Policy, unless the context be repugnant thereto, the word “Campus” shall mean and include both Workplace and University Campus and Hostels of the Atlas Skilltech University as mentioned above.

g) Visitor / Third Party: Visitor or Third Party includes any person who is visiting the Campus and is not covered by any of the other categories defined by this Policy. For example, guests coming for physical/online interviews, meetings, events, programs or people walking in for meeting existing Employees, Students etc.

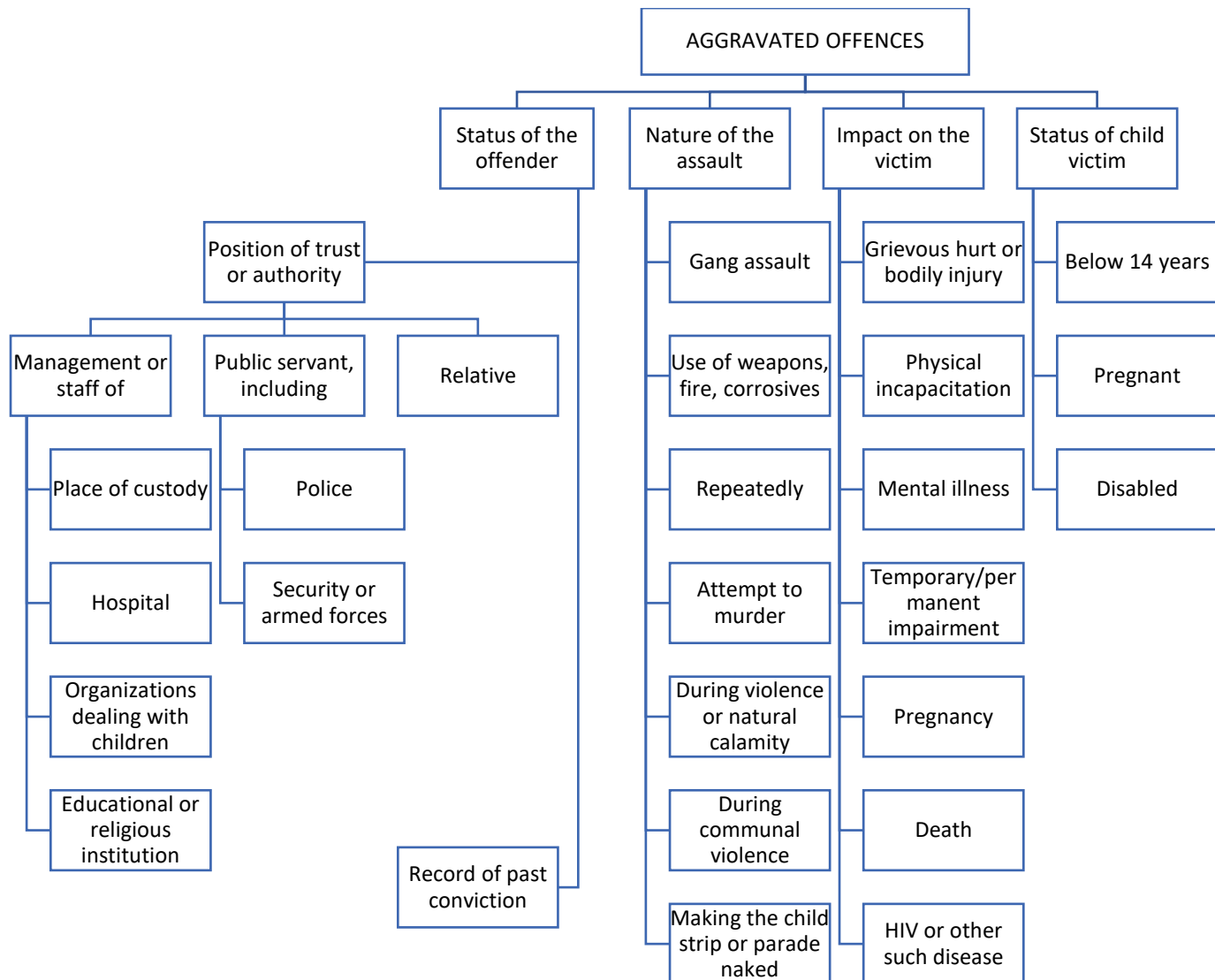
h) Child Protection Committee (“CPC”): Child Protection Committee shall mean the Committee as mentioned in **ANNEXURE III**.

6. What does Sexual Offences under the POCSO Act cover?

- a) **Penetrative sexual assault and sexual assault:** There are two kinds of sexual assault under the POCSO Act, penetrative sexual assault and sexual assault. The key difference between the two is the involvement of penetration, wherein the former involves penetration and latter does not. Please see the flow chart below for further details on the definitions of the same.



- b) **Aggravated penetrative sexual assault and aggravated sexual assault:** The offence of penetrative sexual assault or sexual assault is considered to be aggravated in the presence of certain aggravating circumstances, as set out below, depending on the status of the offender, nature of the assault, impact on the victim and status of the victim. Please see the flow chart below for further details on the definitions of the same.

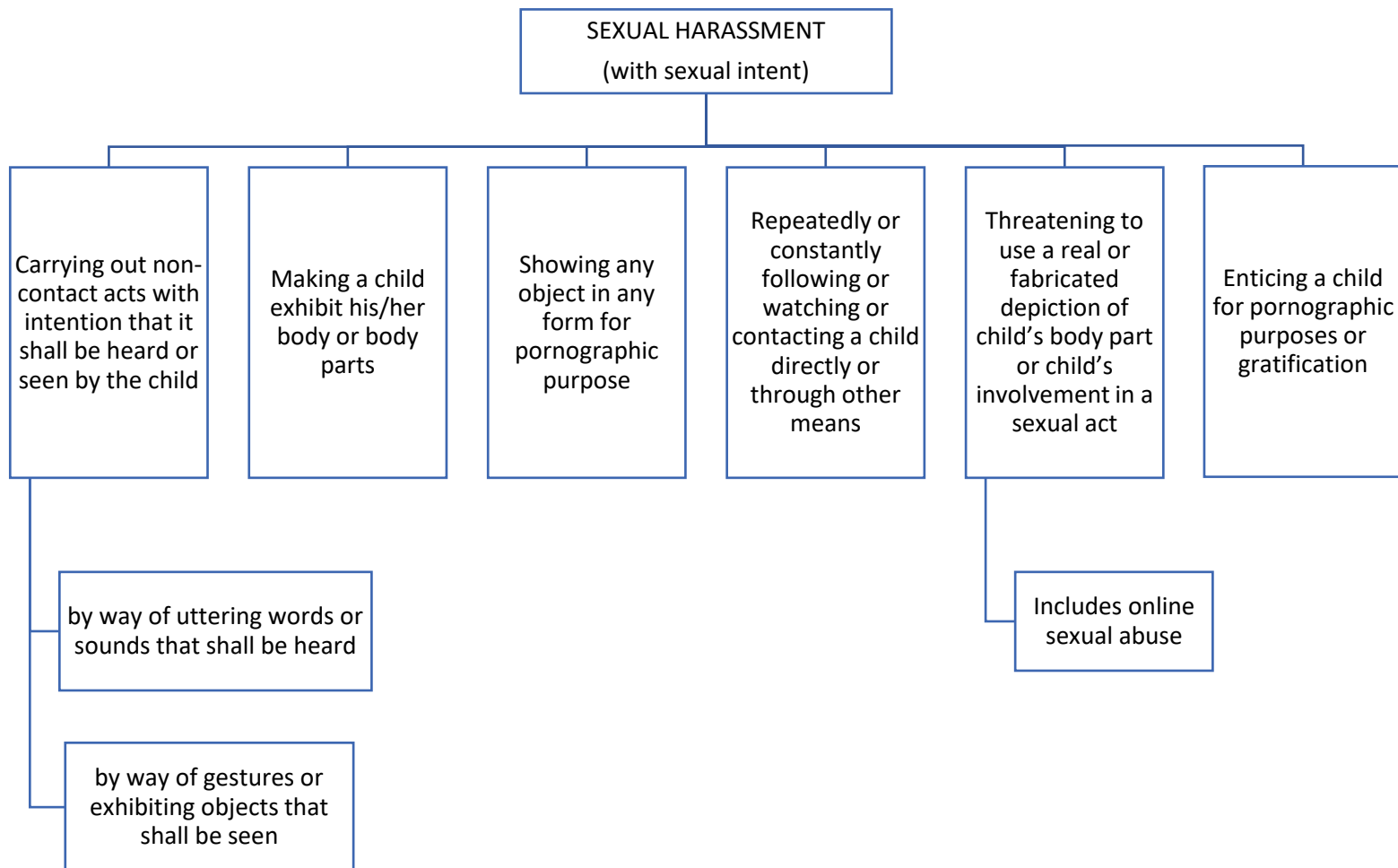


- c) **Pornographic purposes:** This would mean using a child for pornographic purposes or storage of pornographic material involving a child. Using a child for pornographic purposes would mean using a child in any form of media (including programmes or advertisements telecast by television channels or on the internet or any other electronic form or printed form, whether or not such programme or advertisement is intended for personal use or distribution) for the purpose of sexual gratification, in any medium, for preparation,

production, offering, transmitting, publishing, facilitation and distribution of the pornographic material, including:

- representation of the sexual organs of a child.
- usage of a child engaged in real or simulated sexual acts (with or without penetration);
- the indecent or obscene representation of a child.

d) **Sexual harassment:** Committing any of the following on a child with sexual intent, is going to be considered as sexual harassment:



All the above offences described under this Clause 6 shall be jointly referred to as “**Sexual Offences or Sexual Abuse**” hereinafter. The details related to Punishments applicable in case of each kind of offence discussed above have been provided in detail in **Annexure I**.

7. What are the other acts under POCSO Act considered as Offence?

a) **Abetment of offence:**

- Instigating another person to commit any of the aforementioned sexual offences, or

- Engaging with one or more persons in any conspiracy for the commission of that offence, or
- Intentionally aiding commission of that offence by any act or illegal omission.

The details related to Punishments applicable in this case have been provided in detail in **Annexure I**.

- b) **Attempt to commit an offence:** Any person who attempts to commit any of the aforementioned sexual offences or causes such an offence to be committed, and in such attempt, does any act towards commission of such offence. The details related to Punishments applicable in this case have been provided in detail in **Annexure I**.

8. **Reporting Child Sexual Offences**

In keeping with the international child protection standards, the POCSO Law mandates reporting of such offences. Hence, any University Stakeholder (including a Child), who has any knowledge that a sexual offence has been committed against a child or has an apprehension that an offence (As defined above) is likely to be committed, must report such information to appropriate authorities i.e. the local Police or Special Juvenile Police Unit (“**Police**”). Failure to report a Sexual Offence committed against a Child is punishable under the POCSO Law, with imprisonment of up to six (6) months along with fine. For a person in charge who fails to report, the punishment is imprisonment up to one (1) year along with fine.

Please refer to **Annexure II** for more details on the reporting process to be followed.

9. **Disciplinary Action that can be taken by the University against University Stakeholders**

In case of a Sexual Abuse involving a University Stakeholder, during the time that the information is being looked into / investigated by the Police, and depending upon the facts and circumstances, University will have the discretion and authority to suspend such University Stakeholder against whom the offence has been reported if University believes that in the context of the facts and circumstances it is necessary to do so. During the pendency, it shall have the discretion and authority to prevent contact between the Child and the Accused, if required. At all points in time, the best interest of the Child shall be paramount.

At its discretion, the University also reserves the right to inform the Child and Child’s parent or guardian or other person in whom the child has trust and confidence about the report being filed against the Accused and offer any co-operation or support as may be required for authorities to effectively look into the complaint. If, after the investigation, it comes to the notice of University that such University Stakeholder is not found guilty, University may revoke the suspension, subject to its discretion. If the University Stakeholder is found to be guilty after the investigation or through the court trial, the punishment shall be dismissal or discharge from service without notice or compensation in lieu of notice.

10. **Protection from Retaliation**

The University does not tolerate retaliation of any kind and reserves the right to take any appropriate measures as may be necessary to provide protection against retaliation. No University Stakeholder will incur any liability and/or retaliation for taking the step of coming forward and making a complaint, in good faith, of an action that constitutes Sexual Abuse of a Child. Notwithstanding the process under POCSO Law, strict disciplinary measures shall be taken against anyone found guilty of retaliation as per University Guidelines.

11. Confidentiality

University will ensure that adequate protection and steps are taken to ensure that no breach of confidentiality (regarding the identity of the Child) takes place whilst reporting, or maintaining database or while taking any other measures to address or prevent Sexual Abuse against a Child.

The University Stakeholders must note that Sexual Abuse of a Child is a very sensitive and delicate concern and must be handled with utmost sensitivity while keeping the best interests of the Child in mind all the time. In this regard, all University Stakeholders must ensure that all concerns are raised with the Child Protection Committee (as listed in **Annexure III**) only in a confidential manner. Except as mentioned in this Policy, no University Stakeholder shall disclose, in any manner, the identity of a child including their name, address, photograph, family details, school, neighbourhood or any other particulars which may lead to disclosure of identity of the Child. If any University Stakeholder breach confidentiality, University shall, at its discretion, take strict disciplinary action against them in accordance with University Guidelines.

12. Consequences of Reporting False Complaints of Sexual Abuse

The POCSO Act prescribes a punishment if any person knowingly files a false complaint or provides false information of child sexual abuse, in respect of any of the sexual offences mentioned above, solely with the intention to humiliate, extort or threaten or defame the other person. Further, whoever, not being a child, makes a false complaint or provides false information against a child, knowing it to be false, thereby victimizing such child shall also be punished as per law. It must also be noted that:

- a) Where a false complaint has been made or false information has been provided by a child, no punishment shall be imposed on such child.
- b) No person shall incur any liability, whether civil or criminal, for giving the information in good faith.
- c) in case University becomes aware that any of the University Stakeholders have filed a false complaint, it shall also take strict disciplinary action against such person as per [internal policies].

13. Sexual Abuse outside the University / Campus

University Stakeholders may or may not know whether a sexual offense has occurred within or outside the Campus. However, it is important to understand that if there are indications of Sexual Abuse, it is the responsibility of University Stakeholders to report the same as per the mechanism provided in **Annexure II**.

14. Measures for Prevention of Sexual Abuse against Children and Duties of University Stakeholders

An explicit condition of working with and / or being connected with the University is acceptance of and commitment to this Policy along with the Annexures, including the Code of Conduct it embodies in Annexure IV. All University Stakeholders are required to read and adhere to the Policy, and sign an acknowledgment with respect to the same, as a statement of commitment to the Policy.

Further, Sexual Abuse against Children can be prevented and initiatives can be taken at the University level to ensure the same and all University Stakeholders can play a role. The following need to be kept in mind:

- a) **University Stakeholder's duty to Understand the Needs of Children**

University realizes and recognizes that Children at the Campus come from a floating population and have diverse backgrounds, cultures and religious beliefs. All University Stakeholders, therefore, must understand that Children in the Campus need:

- (i) A feeling of safety, privacy and security
- (ii) Love and belonging, emotional support and stability
- (iii) Respect for their feelings
- (iv) Fair treatment, with respect, dignity and integrity
- (v) Smiles, praise and encouragement
- (vi) To be listened to. All children have a right to be heard and raise concerns.
- (vii) Special understanding and care, tolerance
- (viii) Consistent access to education, growth, and development, be it emotional, physical, or mental, as well as positive role models they can look up to
- (ix) Consistent access to food, shelter, clothing and good sleep
- (x) Consistent access to healthcare, good sanitation, safe drinking water, a clean and safe environment, and information that helps them stay healthy
- (xi) Protection from violence, neglect, physical and sexual abuse, and from dangerous drugs and narcotic substances. For example, use of any abusive language against them and in front of them or physical disciplinary measures
- (xii) Freedom of opinion, expression and association
- (xiii) Ability to participate in decision-making involving oneself

University Stakeholders understand that all endeavours will be made to ensure, through everyday actions in the Campus that these needs are fulfilled.

b) University's duty to create Awareness

- (i) University will disseminate this Policy effectively.
- (ii) University will be responsible for posting a CHILDLINE 1098 service poster at the Campus. CHILDLINE is a 24-hours free emergency phone outreach service for children in need of care and protection.
- (iii) Children attending the Campus shall be made aware of their rights, how and to whom they can reach out to in case they have any concerns.
- (iv) Suitable material and information may be displayed at conspicuous places in the University.
- (v) University Stakeholders will undergo orientation training on the Policy, including behaviour and communication guidelines when in contact with Children, purpose of child protection and the POCSO Law to the best extent possible. The Code of Conduct (**Annexure IV**) gives a full explanation of and contains guidance on appropriate behaviour of adults towards Children.
- (vi) All University Employees will receive an annual refresher training.
- (vii) Appropriate Individuals, including but not limited to the CPC Members, who are responsible for upholding the provisions of this Policy shall strive to keep abreast all the legal and other updates related to the topic.

c) University's other duties

The University is duty bound to adhere to applicable legal provisions under the laws from the perspective of not only compliance but also effective redressal and prevention of Sexual Abuse of children. It shall do the following:

- (i) University will conduct background checks and police verification for all its Employees and background check of other University Stakeholders as well, to the extent feasible. As part of such background check, whether any complaints under POCSO Law have been filed will also be checked.
- (ii) University shall ensure that any Visitor or Third Party to the Campus is accompanied by a University Employee.
- (iii) All the photographs, videos or any other form of multimedia that the University shall use for official purposes on any University platform shall present children in a dignified and respectful manner. In case any objection is reported with respect to any of the media used by the University, the University shall take due care and reasonable steps to remove the display of such material.
- (iv) Before photographing or filming a child for work related purposes, University assesses and complies with local traditions and accepted practices or restrictions on reproducing personal images.

15. Recourse to Applicable Laws

The Policy has been formulated basis the Indian Law, especially the POCSO Law. It does not, in any manner, prevent the aggrieved Child from taking recourse to remedies under any other applicable Laws.

16. Review

The Policy shall be reviewed from time-to-time depending on any changes in the Law or University.

17. Entire Policy

The Annexures to the Policy form a part of the Policy and shall be read in totality for a complete and holistic understanding of measures that are being taken and that can be taken in relation to child protection. Further, this Policy must be read in conjunction with the other policies of the University.

This Policy, along with its Annexures, supersedes all previous policies, discussions, negotiations and arrangements that the University may have had in relation to child protection. Copies of this Policy (along with Annexures) will be available on our website.

ANNEXURE I
LIST OF OFFENCES SET OUT UNDER POCSO LAW

	Offence	Imprisonment	Fine
1.	Sexual assault	3-5 years	✓
2.	Aggravated sexual assault	5-7 years	✓
3.	Penetrative sexual assault	10 years-life imprisonment If committed on a child below 16 years of age, 20 years-life imprisonment.	✓
4.	Aggravated penetrative sexual assault	20 years-life imprisonment (rigorous imprisonment). Or with death.	✓
5.	Sexual harassment	Up to 3 years	✓
6.	Use of child for pornographic purposes	At least 5 years. In case of second conviction, at least 7 years.	✓
7.	Storage of pornographic material involving child		
	But failing to delete or destroy or report the same to the concerned authority, with an intention to share or transmit child pornography.	-	At least INR 5,000. In case of subsequent offence, at least INR 10,000.

	For transmitting or propagating or displaying or distributing (except for the purpose of reporting or for use as evidence in court).	Up to 3 years	And/or
	For commercial purpose	3-5 years. In case of subsequent conviction, 5-7 years.	And/or
8.	Abetment of offence	Depends upon the kind of offence and is punishable accordingly.	
9.	Attempt of offence	Depends upon the kind of offense and is punishable accordingly, but can be: - 1/2 of life imprisonment or - 1/2 of the longest term of imprisonment provided for that particular offence, or - Fine, or - Fine and imprisonment.	
10.	Failure to report an offence	Up to 6 months	And/or
11.	Failure to report an offence by head of a company/institution	Up to 1 year	And/or
12.	False complaint or false information against an adult	Up to 6 months	And/or
13.	False complaint or false information against a child	Up to 1 year	And/or
14.	Making any report or presenting comments on any child from any form of media or studio or	6 months -1 year	And/or

	photographic facilities without having complete and authentic information		
15.	Disclosing the identity of a child in the media	6 months -1 year	And/or

ANNEXURE II

REPORTING SEXUAL OFFENCES AGAINST CHILDREN

Process to be followed:

In line with its Vision & Mission, the University takes its responsibilities under this Policy very seriously and shall respond to complaints of Sexual Abuse against Children immediately. The below process will be followed for the same:

1. If a Sexual Offence has been committed or is likely to be committed by any person against a Child associated with University in any manner, and any of the University Stakeholders are in knowledge of the same, they shall be required to immediately inform this to the **Child Protection Committee** (details of the Committee are provided in **Annexure III**).
2. The Child Protection Committee will make a note of this concern and make arrangements to report it to the Police immediately.
3. The Committee shall maintain a database of (1) the number of concerns raised in a given year and (2) actions taken, so that all information is available in one place for effective reporting and functioning.

The University believes that children are also informed and knowledgeable to participate in their own protection. They should, therefore, have safe, protected and constructive channels for self-expression and participation so that they can raise their grievances. Hence, as per this Policy, concerns can be raised by children as well, and these shall be immediately looked into in the same manner as prescribed above.

Indicators of Child Sexual Abuse

When a child is being sexually abused, they may suffer from depression, post-traumatic stress disorder, anxiety, low self-esteem, propensity to further victimization in adulthood, psychological trauma etc. It is important to realize that sexual abuse can occur outside of the Campus, and may be reflected in the child's behaviour while at the Campus including demonstrations of bravado, excessive anxiety or fear, withdrawal or lack of attention, cringing when approached or lack of participation in classroom activities. There may also be visible bruising or injuries and the child may show signs of gross undernourishment.

University also acknowledges that it is not always easy to recognize the situations wherein the child is being abused sexually, however early detection can certainly prevent further sufferings of the child effectively along with taking action against the accused as per Law. The University Stakeholders should try to be more sensitive and observant to help identify the perpetrators of child abuse not just at their workplace or places they visit for the purpose of work, but also in their personal spaces and homes, provided the children are showing signs or complaining of abuse at the Campus.

The following are the indicators that one can be mindful of in order to understand whether a child is getting sexually abused.

(i) Physical Indicators

- Unexplained or suspicious bruises, bleeding, injuries, cuts or burns particularly if situated on a part of the body not normally prone to such injuries and for which the child does not provide a consistent explanation.
- Other symptoms of physical trauma including pain or problems with urination/defecation or blood-stained and/or torn underwear. The physical discomfort may cause the child to limp, perform poorly at sport, drop out of strenuous play activities or perhaps even have difficulty in sitting still.
- Child complaining about itching, inflammation or infection of urethral, vaginal or rectal openings or pain in the body (specially breasts, buttocks, lower abdomen or thighs).
- Bedwetting and faecal soiling despite being toilet-trained, and/or thumb sucking.

(ii) **Behavioural Indicators**

The behavioural indicators set out below represent changes in the child's behaviour and may not be relevant in case the child behaves in such a manner normally.

- Sudden unexplained money or gifts and talk of a new, older friend.
- Age-inappropriate expressions and sexually explicit behaviour, such as sexual play with toys, self or others, sexual themes in child's artwork or stories or play, detailed and overly sophisticated understanding of sexual behaviour or sexual awareness.
- Avoids being touched or stiffens when embraced.
- Statements such as "I've got a secret", or "I don't like Uncle".
- The child describing what appears to be an abusive act involving themselves and another child or University Stakeholder or any other person, who the child has come in contact with.
- Unexplained changes in the child's behaviour, for example, becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper.
- Sudden dislike or withdrawal from people or places.
- Clingy behaviour and irritability in young children.
- Overly compliant behaviour or becoming totally non-compliant.
- Increased inability to concentrate and/or sudden deterioration in attendance or performance.
- Non-participation or unwillingness to participate in social and physical/recreational activities, especially if this is due to symptoms of physical discomfort.

(iii) **Socio-Emotional Indicators**

Similar to the indicators above, the socio-economic indicators set out below represent changes in the child's behaviour and may not be relevant in case the child behaves in such a manner normally.

- Fear of certain places such as bedroom, bathroom, dark spaces and feeling suffocated. Fear of going home or of a certain individual or expressing a desire to live in a foster home/institution.
- Experiencing anxiety, depression, phobias, obsession etc.
- Experiencing guilt, shame and self-blame.
- Feeling sad, hopeless and angry.
- Not able to recall/poor memory.
- Refusing to go to school/class, wanting to dropout.
- Poor interpersonal and peer relationships, delinquency, antisocial changes.
- Constant sleep disturbances and nightmares.

- Marked changes in appetite and eating patterns including overeating or loss of appetite.
- Extreme changes in physiological system.

(iv) Indicators of Online Child Sexual Abuse

- Using an online account belonging to someone other than that of the Parent or Guardian that an University Stakeholder typically interacts through.
- Becoming withdrawn from the family.
- Receiving mails, gifts, packages, etc. from someone the family doesn't know.
- Receives or makes/sends phone calls and emails or text messages to someone the family doesn't know.
- Turns the computer/mobile phone off or quickly changes screen when someone is around.
- Suddenly large amount of time spent online, especially at night, or the exact opposite, i.e., suddenly the child avoids using online space even if it is for class and assignments.
- Not being able to talk openly about their activity online and becoming increasingly secretive about, particularly their use of technology.
- Becoming more possessive of their mobile phone and concerned if someone else picks it up or wants to look at it.
- Agitated behaviour when answering the phone.
- Getting distracted very easily during an online class, which may result in poor academic performance.

It must be recognized that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is NOT the responsibility of the University Stakeholders to decide that child abuse is occurring. It is their responsibility to act on any concerns.

Important points to keep in mind about reporting:

- Maximum time for reporting of any Child Sexual Abuse must be 24 hours from the time of knowledge or apprehension of such Sexual Abuse.
- Complaints must be reported to the Child Protection Committee only.
- Complaints must be reported confidentially.
- Child Protection Committee is a trained body and is aware of provisions of the POCSO Law.
- Inform the Committee immediately, if the child needs to be removed from any imminent danger immediately. Please note that time will be of essence in such situations.
- When reporting, provide as many details as possible (such as details of the Child, details of the accused, what happened, what was seen, heard etc., any indicators of sexual abuse of the Child, nature and extent of injuries, if any, etc.).
- Police may require your co-operation.
- Do not further question or interrogate the Child.
- If the Child has informed you, let the Child know that that the problem will be attended to.
- If it requires you to stay with the Child (if they appear scared, worried etc.) while the complaint is being reported, please do so to provide the mental / emotional support.

Measures provided under the POCSO Law for safety of the child after Reporting:

POCSO provides for a procedure for care and protection of a Child an incident of Sexual Offence has been reported. Some of the important points from these procedures are highlighted below –

FILE AN FIR	<p>The Police will first file an FIR.</p> <p>A free copy of the FIR is shared with the person making the report with the Police.</p>
EMERGENCY MEDICAL CARE	<p>In case the Child Needs Emergency Care, the Police shall arrange for such Medical Care as per the process provided under the Law.</p>
MEDICAL EXAMINATION	<p>The Child will be taken for medical examination in accordance of the provisions of the Law.</p>
INFORMATION TO THE CHILD'S PARENT OR GUARDIAN	<ul style="list-style-type: none"> - The Police shall inform the Parents or Legal Guardians or any other person in whom the Child has trust or confidence about availability of support services including counselling, and assist them in contacting the persons who are responsible for providing these services and relief. - The Police shall also inform the Parents or the Parents or Legal Guardians or any other person in whom the Child has trust or confidence as to the right of the child to legal advice and counsel. - The Police shall also keep the Parents or the Parents or Legal Guardians or any other person in whom the Child has trust or confidence informed about the developments, including the arrest of the accused, applications filed and other court proceedings
OFFENCES COMMITTED BY AN INDIVIDUAL A CHILD IS LIVING WITH	<p>In case the police apprehends that the offence is committed or attempted or is likely to be committed -</p> <ul style="list-style-type: none"> - By a person living in the same or shared household with the child or - The child is living in a child care institution and is without parental support or - The child is found to be without any home and parental support <p>Then, the police shall, within 24 hours, produce the child before the Child Welfare Committee (CWC) who will then, within 3 days, determine actions that may need to be taken for due care and protection of the child including taking the</p>

	child out of the custody of their family or shared household and placing them in a children’s home or a shelter home.
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ANNEXURE III

LIST OF PROTECTION OF CHILDREN FROM SEXUAL OFFENCES OFFICERS

NAME	ROLE	CONTACT DETAILS
BHARGAVI DESHPANDE	DIRECTOR - STUDENT EXPERIENCE	9920887730
KUNAL RAMCHANDANI		9930767612
AMAN GADA	STUDENT COUNCIL	7045775710
TANYA D'SOUZA		9769292469

Any University Stakeholder may contact any of the Committee Members for reporting of any instance of Sexual Offences against Children.

ANNEXURE IV
CODE OF CONDUCT AS PER THIS POLICY

This Code of Conduct is applicable to all University Stakeholders who come in direct or indirect contact with the Children in the Campus.

Standard of Behaviour

All University Stakeholders should endeavour to create an enabling and open environment for the child's personal, physical, social, emotional, moral and intellectual development, which also encourages open communications.

a) Fair treatment, with respect, dignity and integrity

(i) Adults will at all times:

- Respect the child's voice and views.
- Be inclusive and involve all children without regard to their or their parents' or their legal guardian's age, colour, culture, gender, sexual orientation, nationality, ethnic origin, community/race, caste, colour, ancestry, marital status, disability, religion, language spoken or any other status.

(ii) Adults will not

- Act in any way to embarrass, shame, humiliate or degrade a child.
- Use language that mentally or emotionally abuses a child.
- Use abusive or bad language or use swear words.

b) Feeling of safety, privacy and security

(i) Adults will at all times:

- Be sensitive, respectful and non-discriminatory towards children, including to ensure that children are not harmed or traumatized in any way during the process of any research or data collection undertaken by University on the children attending the Campus.
- Be aware of the potential for peer abuse (children bullying, victimizing or abusing other children).
- Ensure that children leave the premises only with a an individual related to the child such as a parent or a guardian that is known to the staff.
- University Stakeholders should keep all personal information about children or their parents/guardians confidential and ensure that such information is provided to only those individuals who are legitimately entitled to it.
- Make sure that all children are given enough information on personal safety so as to be able to protect themselves.
- In case of suspected or observed child abuse of any kind, follow the process outlined in Annexure II and Annexure III of the Policy, as it may be applicable.

(ii) Adults will not:

- Hit or otherwise physically assault a child.

- Give punishments like locking children in darkrooms or send them out of the classrooms etc.
- Smoke or consume alcohol at the Campus or come to the Campus in an inebriated state.
- Kiss, hug or fondle a child in an inappropriate manner.
- Meet a child alone in a secluded place, take a child on an excursion or directly provide a treat unless prior permission is obtained.
- Let children sit on their laps or on other University Stakeholders' laps.
- Stand aside or ignore when they see inappropriate actions or Sexual Abuse inflicted by Children on other Children or by adults on Children.

Standard of Behaviour on Online Platforms:

Adults will at all times:

- Route all online communications to children through their parents/guardian or caregiver unless an University Stakeholder is suspicious that such person is abusing the child.
- Engage with parents/guardians by sharing a digital learning plan and schedule to inform them of times of interaction.
- Ensure that broadcasting location, clothing, surrounding environment, language, behaviour, and body language is professional, appropriate, and culturally sensitive.
- Use full name as a display name in virtual spaces that you interact with students, do not use abbreviations, nicknames or characters that resemble alphabets.
- Set up norms with students about what can be shared on the group, and appropriate timings to do so.
- Ensure that the content being created, used or shared is age-appropriate and culturally sensitive.
- Check that the online learning platform you are using is secure and whether you have control over any intrusions, screen sharing or unwanted attendees.
- 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.
- Always take permission from University authorities, children and their parents before taking their photos or videos and its purpose and adhere to University's Photography and Virtual Platforms Policy.

Adults will not:

- Communicate with children over online platforms, including email, Whatsapp or calls, except and unless it is related to class assignments and other University related work.
- Engage in any relationships with students on social media platforms unless in officially approved group settings. Do not interact with students over Facebook, Instagram, Snapchat, TikTok or Twitter etc.
- Share personal details, contact information, and details of your day-to-day life unless in the context of a learning session.
- Schedule sessions/calls/classes beyond 7PM unless absolutely otherwise not possible, and only do so after informing the student(s) and parent(s) about any upcoming session at least 48 hours in advance.

Standard Behaviour Before, After and at the time of Reporting a Sexual Offence to the Police

Do's and Don'ts before Reporting:

- It will be pertinent to be sensitive and vulnerable towards the child, and be aware of the place, your body language, tone, demeanour, whilst talking to the child.
- Do not ask too many questions, rather, give more importance to listening to the child. If the child is not comfortable or interested, do not ask any questions, and ensure that the child is accompanied by a responsible adult as far as possible at all times.
- Do not touch the child unnecessarily or inappropriately while communicating with the child. Respect the child's personal space.
- Do not stare at the child or sit uncomfortably close.
- No child shall be intimidated, coerced, tricked, threatened, humiliated, insulted, frightened or forced in any manner to report the matter to the authorities or to talk about the incident or violation(s) inflicted on the child.
- If the child has any questions about sexual abuse, be sure to respond to concerns or feelings calmly, promptly and directly.
- Do not make false promises. For example, "everything will be okay" or "you will never have to talk about this again"
- Avoid questioning the child as to why they behaved in a particular manner. For example, why did you not tell your mother, why are you coming to us only now, why were you in school at that time.
- Briefly inform the child what the next steps are going to be.
- Respect the child's privacy by not telling a lot of people, and make sure that other people who know, don't bring the subject up to the child.

Do's and Don'ts while Reporting:

- a) Maintain confidentiality of identity of the child and other details pertaining to the incident, unless questioned by legal authorities
- b) Any form of report (without explicit permission or authority by Court) of any child violation in any newspaper, magazine, news-letter, audio-visual or any other electronic or other forms of media should be avoided by all persons involved, including University Stakeholders and any authorised person. In case such a report of any complaint, inquiry, investigation or judicial procedure leads to identification or disclosure of identity of the child, it is also punishable with imprisonment (specified in **Annexure I**).

Do's and Don'ts after Reporting:

- When any University Stakeholder having knowledge of any child violation is summoned by Police or a court of law, such person should make truthful and complete disclosure.
- Do not blame the child for what happened. Give the child support and reassurance that they are okay and safe.
- The identity of any child who has been victim of sexual abuse shall be strictly maintained with confidentiality and the same should not be made public.