



## **CHILD SAFEGUARDING POLICY**

### **1. Child Safeguarding at Adani International School (ADIS)**

At Adani International School, we uphold the inherent dignity and worth of every individual. We believe that every child and adult in our community is entitled to safety, respect, and equitable treatment - irrespective of age, culture, religion, color, ethnicity, race, national origin, gender, sexual orientation, language, disability, economic status, creed, marital status, perceived impairment, or any other characteristic.

We value diversity and believe it strengthens our culture of learning and care. By fostering understanding and mutual respect, we ensure that all members of the ADIS community treat one another with compassion and responsibility.

These Child Safeguarding Guidelines set clear expectations to ensure a learning environment that is physically, emotionally, socially, and psychologically safe. They apply to all students, staff, parents, guardians, volunteers, contractors, visitors, and to all ADIS-related activities on and off campus.

Safeguarding at ADIS is a shared responsibility and an integral part of our culture, curriculum, recruitment, and daily interactions. It includes:

- Preventing harm
- Identifying concerns early
- Providing timely intervention
- Amplifying student voice and agency
- Training staff in trauma-informed practices
- Maintaining strong reporting systems
- Ensuring transparency and accountability

Every adult interacting with children at ADIS is required to follow this policy without exception.

## **2. Essential Beliefs and Practices**

### **2.1 Essential Beliefs**

At ADIS, every child has the right to safety and protection from harm, abuse, neglect, and exploitation. A secure environment is essential for children to learn, grow, and thrive. All staff share responsibility for child protection and must apply professional standards consistently, without discrimination of any kind.

Our curriculum intentionally builds students' awareness of rights, personal safety, and how to seek help.

### **2.2 Essential Practices**

ADIS ensures the following core safeguarding measures:

- Annual communication of the Child Safeguarding Policy to the entire community
- Mandatory annual training and signed Code of Conduct for all staff
- Clear reporting procedures accessible to all
- Ongoing safeguarding education for students
- Information and guidance for parents
- Appointment and training of a Safeguarding Lead and Child Protection Officers
- Safeguarding Committees to conduct initial fact-finding
- Safeguarding Response Team to manage serious concerns
- Safe recruitment practices aligned with child protection standards

### **2.3 Recognizing Abuse**

While staff are not expected to determine whether abuse has occurred, **every member** must report any concern so safeguarding teams can assess risk and act.

Definitions and indicators of abuse are provided in **Appendix B**.

### **2.4 Reporting a Concern**

All staff must report concerns immediately, whether arising from:

- A disclosure
- A witnessed event
- Patterns observed over time

Concerns must be reported to the Safeguarding Lead/Officer; if the allegation involves them, it must be escalated to the Head of School.

**Staff must record concerns in writing—objectively, using the child's words—sign, date, and submit them promptly. Failure to report may lead to disciplinary action and legal consequences.**

## **2.5 Handling Disclosure**

When a child shares a concern, staff must respond with sensitivity:

- Listen attentively without interruption
- Ask only essential clarifying questions
- Avoid judgment, shock, or criticism
- Reassure the child for speaking up
- Explain confidentiality limits
- Inform them that the matter will be shared with safeguarding staff
- Record the disclosure immediately and accurately
- Staff must never promise complete confidentiality.

## **2.6 Confidentiality**

Safeguarding information is strictly confidential:

- Sharing details with anyone not directly involved is prohibited
- Breaches may result in dismissal or criminal action
- Records are accessible only to authorised safeguarding personnel
- Information is shared externally only when required by law
- Records may be transferred to another school upon formal request

Staff must share sensitive information only with designated safeguarding officers.

## **2.7 Support for Staff**

Safeguarding incidents can be emotionally challenging. Staff affected by disclosures may:

- Seek support from the Safeguarding Officer
- Be referred to counselling or assistance programmes
- Receive temporary duty adjustments where appropriate

## **2.8 Responding to a Cause for Concern**

ADIS follows a structured process:

### **2.8.1 Receipt**

- Stamp date/time, record essential details, and submit to the Safeguarding Officer

- Do not investigate independently

### **2.8.2 Alerting**

- Safeguarding Lead/Officer assesses risk (low/medium/high)
- High-risk concerns trigger immediate Response Team involvement

### **2.8.3 Fact-Finding**

- Committee reviews records, preserves evidence, interviews witnesses
- Conducted by two committee members
- Purpose is risk assessment—not disciplinary investigation

### **2.8.4 Low-Risk Cases**

- A support plan is created, responsibilities assigned, and progress monitored

### **2.8.5 High-Risk Cases**

A multidisciplinary meeting (Safeguarding Team, Head of School, HR, and relevant specialists) addresses:

- Immediate safety and protective measures
- Evidence preservation
- External reporting obligations
- Communication plans
- Accurate documentation of actions and decisions

### **2.8.6 Protective Actions**

May include emergency services, medical attention, supervised contact, temporary staff changes, or urgent counselling.

### **2.8.7 Witnesses & Parents**

- Witness statements obtained when needed
- Parents informed unless doing so increases risk or undermines investigations

### **2.8.8 Speaking to the Alleged Perpetrator**

- Conducted fairly, confidentially, and with due process
- HR support provided where appropriate

### **2.8.9 Decision-Making**

- Next steps may include referral, discipline, monitoring, or case closure
- All decisions documented and regularly reviewed

### **2.8.10 Post-Incident Learning**

- Ongoing support is provided to all affected
- Safeguarding Committee identifies lessons learned to strengthen practice

## **2.9 Protection and Support**

### **2.9.1 For the Child**

ADIS prioritises the child's safety throughout proceedings:

- Ensuring ongoing protection and emotional, psychological, and academic support
- Providing access to counselling and continuity of learning
- Taking all concerns seriously, including those raised by alumni

### **2.9.2 For the Alleged Perpetrator**

Handled with fairness:

- Dignity, privacy, and due process are upheld
- Allegations communicated clearly
- Opportunity to respond provided
- Employment/legal rights respected

### **2.9.3 Legal Compliance**

- Law enforcement notified when required
- Evidence preserved carefully
- Full cooperation with authorities while supporting the child

### **2.9.4 Protecting School Integrity**

ADIS maintains transparent, professional, and unbiased safeguarding practices that reinforce confidence across the community.

## **3. Roles and Responsibilities**

A strong safeguarding culture requires clear responsibilities across the school.

### **3.1 Head of School**

The Head of School ensures effective implementation of the Child Safeguarding Policy and will:

- Supervise and support the Designated Safeguarding Lead (DSL).
- Chair the Safeguarding Response Team (SRT).

- Ensure the DSL has the authority and resources to act.
- Review safeguarding updates and reports.
- Prioritise safeguarding in decision-making.

### **3.2 Child Protection Officer (CPO)**

The CPO oversees all safeguarding procedures and will:

- Ensure practices align with Indian law (POCSO), UNCRC, and accreditation guidelines.
- Oversee management and investigation of concerns.
- Maintain secure safeguarding records.
- Receive specialist training and support staff.
- Lead the Safeguarding Committee.

### **3.3 Safeguarding Officers**

(SLT designees, Principals, CPO, Counsellors, HR/Admin)

They are responsible for:

- Implementing safeguarding procedures within their divisions.
- Receiving, documenting, and escalating concerns.
- Participating in fact-finding inquiries.
- Maintaining confidential records and receiving role-specific training.

### **3.4 Safeguarding Committee (School Complaints Committee – SCC)**

Comprising the DSL, Safeguarding Officers, and Counsellor, the committee will:

- Conduct initial fact-finding on all concerns.
- Preserve evidence and conduct joint interviews.
- Decide whether to resolve at committee level or escalate to the SRT.

### **3.5 Safeguarding Response Team (SRT)**

Includes the DSL/CPO, Divisional Head, Head of School, and Counsellor; may include HR and Communications when needed.

Responsibilities include:

- Investigating serious/high-risk allegations.
- Making decisions on referrals to external agencies.
- Implementing immediate protective actions.
- Ensuring legal and procedural compliance.

### **3.6 All ADIS Staff (Including Outsourced & Support Staff)**

Every adult at ADIS has a mandatory duty to safeguard children. All staff must:

- Understand the Child Safeguarding Policy and attend annual training.
- Report all concerns immediately.
- Ensure visitor compliance.
- Follow safe-practice expectations (no isolated one-to-one settings, no personal social media contact, no retaining student images, use staff bathrooms only).
- Maintain professional conduct and strict confidentiality.

**All staff must sign the annual Safeguarding Declaration.**

## **4. Policy and Supporting Documents**

The Child Safeguarding Policy must be read with all relevant legislation, standards, and school policies.

### **4.1 Indian Legislation**

- *POCSO Act, 2012* – mandatory reporting requirements and legal procedures.

### **4.2 International Standards**

- *UNCRC (1989)*
- *ITFCP Standards*
- *ICMEC Guidelines*
- *CIS Core Standards (Domain E: Student Learning & Well-Being)*

### **4.3 Internal School Documents**

- ADIS Safeguarding Guidelines
- ADIS Staff Handbook
- All related health, safety, behaviour, and welfare policies
- Together, they form the ADIS safeguarding framework.

## **5. Policy Development and Review**

### **5.1 Review Cycle**

- Formal review in 2025; thereafter annually.
- Review team: Principal, CPO, Counsellors, HR/Admin, SLT.
- Evidence of compliance includes audits, training logs, trip risk assessments, monthly reports, and vetted provider lists.
- A comprehensive evaluation is scheduled for 2025–26.

## **5.2 Amendments**

- Proposed changes drafted by the DSL/Safeguarding Committee,
- Reviewed by SRT,
- Submitted to SLT for consultation,
- Approved by the designated governance body.

## **5.3 Continuous Improvement**

ADIS remains committed to strengthening safeguarding through ongoing review, learning from cases, adopting international best practices, and ensuring alignment with updated legal requirements. **The best interests and safety of children remain the highest priority.**

## **6. Acknowledgements**

The ADIS Child Safeguarding Committee acknowledges the valuable contributions of reputable, freely accessible national and international safeguarding resources. These references have informed and strengthened the school's Child Safeguarding Policy and Procedures.

## **Appendix A: Staff Safeguarding Code of Conduct**

ADIS is committed to safeguarding all students in line with the UNCRC (1989). All staff, interns, volunteers, outsourced personnel, coaches, and students representing the school must follow the ADIS Child Safeguarding Guidelines and this Code of Conduct. These expectations ensure a safe, respectful, and professional environment for children.

### **Staff Declaration**

#### **A. Professional Conduct**

- I will treat all individuals with respect, dignity, and fairness.
- I will maintain clear physical, emotional, and sexual boundaries.
- I will use discretion before any physical contact and ensure it is appropriate, respectful, and contextually justified.
- I will not engage in or appear to engage in any form of abuse, exploitation, or harmful behaviour.

#### **B. Communication & Technology**

- I will communicate with students only through school-approved platforms.
- I will not interact with students via personal social media or messaging apps.
- I will not store or use students' personal contact details on personal devices.
- I will not post or share student images or information on personal platforms.

### **C. Compliance**

- I will report all safeguarding concerns immediately to the Designated Child Protection Officer or Safeguarding Team.
- I will cooperate fully with all safeguarding inquiries.
- I will maintain confidentiality and share information only on a need-to-know basis.

### **D. Conduct in School Settings**

- I will follow all ADIS guidelines for field trips, transportation, changing rooms, and restrooms.
- I will use staff-designated facilities and enter student areas only when required for supervision.
- I will maintain professional behaviour and appearance at all times.

### **E. Prohibited Behaviour**

- I will not give students alcohol, drugs, cigarettes, or inappropriate material.
- I will not request or store students' personal contact details.
- I will not isolate myself with a student in a non-visible or unauthorised space.

### **Acknowledgement**

I agree to follow this Code of Conduct and understand that violations may result in disciplinary action, termination, and legal consequences.

## **Appendix B: Key Safeguarding Definitions**

### **1. Child**

Any ADIS student under 18, as per Indian law and the UNCRC.

### **2. Staff Member**

Anyone directly employed by ADIS, including teaching, administrative, leadership, counselling, and support staff.

### **3. Outside Staff**

Individuals or organisations providing services to ADIS (e.g., transport, maintenance, cafeteria, security, activity providers, contractors).

### **Low-Risk Concerns**

Concerns that affect a student's emotional or mental well-being but do not indicate immediate danger, such as anxiety, social struggles, or early signs of risk behaviour.

**Response:** Counsellor support, parent-teacher collaboration, internal/external counselling, documentation, and monitoring by the Safeguarding Committee.

## **High-Risk Concerns**

Situations requiring **immediate escalation**, including:

- Allegations or signs of abuse
- Serious harm or attempted self-harm
- Criminal behaviours involving a child
- Concerning behaviour by an adult or peer in school or outside

Handled exclusively by the **Safeguarding Response Team (SRT)**.

## **Grooming**

Grooming is when someone builds a relationship with a child—and sometimes the family—to enable sexual abuse.

## **Stages of Grooming**

1. Targeting
2. Building trust
3. Meeting a perceived need (attention, gifts, support)
4. Isolation
5. Sexualising interactions
6. Maintaining control (secrecy, threats, shame)

## **Examples**

- Sexual jokes or comments
- Sharing intimate or sexual information
- Inappropriate touching
- Sharing or seeking sexualised content
- Taking photos/videos for sexual purposes

Any concern related to grooming must be reported immediately.

## **Child Protection**

Actions taken to prevent or respond to abuse, neglect, exploitation, or violence—especially when a child is at risk of significant harm.

## **Child Safeguarding**

A broader, proactive approach that ensures safety through policies, systems, safe practices, prevention efforts, and a protective school culture. Child protection is one component of safeguarding.

## **Appendix C: Signs of Child Abuse**

### **Child Abuse (WHO Definition)**

Any physical, emotional, or sexual ill-treatment, neglect, exploitation, or violence causing harm to a child's well-being or development.

#### **1. Physical Abuse**

Use of force that causes or risks injury.

**Examples:** hitting, shaking, burning, poisoning, drowning, giving harmful substances, corporal punishment, or serious self-harm.

#### **Signs**

- Injuries inconsistent with explanations
- Bruises, burns, fractures, repeated infections
- Withdrawal, fear of adults, hiding injuries, aggression, running away

#### **Indicator in Adult**

- Harsh discipline
- Negative or demeaning descriptions of the child
- Inconsistent explanations for injuries

#### **2. Emotional Abuse**

Persistent behaviour that damages a child's emotional development.

#### **Examples**

- Constant criticism, humiliation, or threats
- Withholding affection or support
- Intimidation, bullying, exploitation
- Shaming or belittling publicly or privately

#### **Signs**

- Extreme behaviour (withdrawn/aggressive)
- Anxiety, low self-esteem
- Frequent psychosomatic complaints
- Loss of concentration, isolation, attention-seeking
- Substance use or chronic lying

### **Indicators in Adult**

- Consistent belittling, shouting, rejecting or humiliating behaviour

### **3. Sexual Abuse**

Any sexual activity involving a child, with or without physical contact, including peer-on-peer abuse when power imbalance exists.

#### **Contact Abuse**

- Penetration
- Kissing, fondling, groping, sexualised touching

#### **Non-Contact Abuse**

- Exposing a child to sexual content or acts
- Creating or sharing pornographic material
- Sexualised conversations
- Online sexual grooming or sexting

#### **Disclosure**

Many children do not disclose due to fear, shame, manipulation, or confusion. Lack of disclosure does **not** mean abuse is absent.

#### **Signs**

- Avoiding specific individuals
- Fear, anxiety, withdrawal
- Sexual behaviour inappropriate for age
- Sexual language or knowledge beyond norms
- Nightmares, bed-wetting
- Genital pain, STIs, difficulty walking, pregnancy

### **Indicators in Adult**

- Overprotectiveness or inappropriate interest
- Intrusive behaviour or violations of privacy
- Giving gifts or money without reason
- Limiting the child's peer contact
- Encouraging secrecy or "special rules"

## **4. Domestic Abuse**

Domestic abuse includes controlling, threatening, or violent behaviour between people in a relationship—during or after the relationship, including teenage relationships. It may be physical, emotional, sexual, financial, or involve coercive control such as isolation, monitoring, intimidation, or restricting independence. Children exposed to domestic abuse are at high risk of emotional and psychological harm.

## **5. Neglect**

Neglect is the ongoing failure to meet a child's basic physical, emotional, or developmental needs, causing or risking serious harm. Types include physical neglect, affluent neglect, medical neglect, and emotional/moral neglect.

Neglect may involve failing to provide essentials, leaving children unsupervised, ignoring safety, or failing to act on allegations of abuse.

### **Possible Signs**

- *Physical/Developmental*: poor hygiene, hunger, unattended medical needs, chronic fatigue, inadequate supervision.
- *Behavioural*: low self-esteem, poor peer relations, absenteeism, stealing, substance misuse.

### **Possible Indicators of a Neglectful Caregiver**

Indifference, substance abuse, lack of supervision, ignoring school communication, inappropriate media access, or failure to support learning or special needs.

## **6. Peer-on-Peer Abuse**

Peer-on-peer abuse occurs when a child harms or exploits another child. It includes bullying (including cyberbullying), physical harm, sexual harassment or violence, sharing explicit content, and hazing.

### **Safeguarding Expectations**

- Never dismiss behaviour as "banter" or "normal."
- Intervene early; avoid high thresholds for action.
- Address digital abuse seriously.
- Plan long-term support and risk assessment for all children involved.
- When concerns overlap with other safeguarding issues, leadership and the
- Safeguarding Team will coordinate appropriate interventions.

## **7. Self-Harm**

Self-harm is intentional injury to one's body, often used to cope with overwhelming emotional distress. It may help a child express pain, feel control, manage trauma, or

externalise difficult emotions. Self-harm signals significant distress and requires immediate support.

### **Types of Self-Harm**

Cutting, burning, hitting, poisoning, substance abuse, and eating disorders (starvation, bingeing, bulimia, anorexia).

### **Possible Signs**

- *Physical:* unexplained injuries, concealing clothing.
- *Emotional/Behavioural:* depression, withdrawal, hopelessness, avoiding emotional conversations.

### **Suicidal Intent**

Most self-harm is not initially suicidal, but the risk can escalate. Any signs of suicidal thoughts require urgent intervention and professional mental health support.

## **Appendix D: Safe Recruitment Practices**

ADIS ensures that all adults working with children are safe, suitable, and aligned with safeguarding expectations.

ADIS will:

1. **Screen Applicants** – Reject anyone unsuitable or with child-related criminal convictions.
2. **Verify Identity & Credentials** – Check qualifications, employment history, and reasons for leaving roles involving children.
3. **Work With Reputable Agencies** – Require verified background checks, references, and safeguarding training.
4. **Conduct Multi-Layered Interviews** – Use structured, scenario-based safeguarding assessments.
5. **Run Background Checks** – Confirm references with previous supervisors and conduct police/criminal checks.
6. **Maintain Transparency** – Keep clear vetting records within legal limits. Safer recruitment continues through ongoing monitoring, training, and behaviour expectations.

## **Appendix E: Deterrent Practices**

ADIS promotes a culture of transparency and safety through:

### **1. Public Safeguarding Communication**

- Policy available on the website
- Safeguarding posters across campuses

### **2. Annual Training**

- Mandatory training and Code of Conduct sign-off for all staff
- Annual training and signed declarations for outsourced staff

### **3. Physical & Digital Safety Measures**

- CCTV monitoring and high campus security
- Strong supervision protocols

### **4. Safer Recruitment Integration**

- Continuous vetting of all applicants and contracted personnel

These measures deter unsafe behaviour and reinforce a consistent safeguarding culture.

## **STAFF SAFEGUARDING REPORTING FORM**

### **Adani International School – Child Protection Reporting Form**

**Name of Staff Reporting:** \_\_\_\_\_

**Date & Time:** \_\_\_\_\_

**Student Name:** \_\_\_\_\_

**Class/Grade:** \_\_\_\_\_

**Nature of Concern:**

Physical Abuse  Emotional Abuse  Sexual Abuse  Neglect  
 Online Abuse  Peer Abuse  Other: \_\_\_\_\_

**Description of Incident (use child's exact words if disclosed):**

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**Visible Injuries?**

Yes (Describe): \_\_\_\_\_  
 No

**Immediate Action Taken:**

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**Signature of Reporter:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**CPO Review & Notes:**

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**CPO Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_