

Student Protection Policy

1. Summary/Purpose

Antarang Foundation is committed to actively safeguarding students from harm. We take our responsibilities seriously to promote safe practices and protect students from harm, abuse, neglect and exploitation of any form. This Student Protection Policy (“**Policy**”) is intended to support the rights of the Students of Antarang Foundation to study and learn in an educational atmosphere that promotes student welfare and prohibits abuse.

2. Vision

We aim to create a “student safe” environment, both internally and externally, where students are respected, protected, empowered and active in their own protection, and where the Members (*as defined hereinafter*) of Antarang Foundation are skilled, competent and well supported for meeting their protection responsibilities.

3. Definitions under the Policy:

a. **Organization** is **IMPACT FOUNDATION (INDIA), F1, 1st Floor, Opposite G5A, Laxmi Woollen Mills Estate, Shakti Mills Lane, Off Dr. E. Moses Road, Jacob Circle, Mahalaxmi (West), Mumbai, Maharashtra 400011**

a. **Members** include all staff members engaged at all levels in the Organization, including both full and part time employees, volunteers, interns, trainers, programme visitors, including guest speakers and journalists, donors.

b. **Mentor** is any working professional registered with the Organization as a mentor under the ‘Mentors of Mumbai’ programme.

c. **Student** is any person who has enrolled as a student into any of the programmes of the Organization.

d. **Student Protection Officer (SPO): Palak Sadotra, Manager - Program Quality**

Email: Palak@antarangfoundation.org

e. **Abuse** shall include Physical, Emotional and/or Sexual Abuse and any act or omission (whether directly or indirectly) on the part of Member which results or may result in actual or potential harm, wrong, injury including physical, mental or emotional harm, injury or wrong including an act or omission (whether direct or indirect) which presents an imminent risk of serious and grievous harm, injury and/or wrong to the Student

f. **Physical Abuse** would be non-accidental trauma or physical injury, harm and/or wrong caused by any kind of physical contact including hitting, punching, beating, kicking, biting, burning or otherwise harming a person. Physical Abuse shall also include all acts of omission which cause any harm, injury or wrong and/or result in any form of maltreatment of the Student

g. **Emotional Abuse** would include verbal abuse, mental abuse, psychological maltreatment, restriction of movement, patterns of belittling, denigrating, scape-goating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment towards the Student

h. **Sexual Abuse** shall include sexual harassment as defined in Section 11 of The Protection of Children from Sexual Offences Act, 2012 and shall also include Section 375 and Section 376 from the Indian Penal Code.

Any instances of a Member committing Sexual Abuse upon a Student when such Member-

- i. utters any word or makes any sound, or makes any gesture or exhibits any object or part of body with the intention that such word or sound shall be heard, or such gesture or object or part of body shall be seen; or
 - ii. makes a Student exhibit his/her body or any part of his/her body so that it is seen by such Member or any other person; or
 - iii. shows any object to a Student in any form or media for pornographic purposes; or
 - iv. repeatedly or constantly follows or watches or contacts a Student either directly or through electronic, digital or any other means; or
 - v. threatens to use, in any form of media, a real or fabricated depiction through electronic, film or digital or any other mode, of any part of the body of the Student or the involvement of the Student in a sexual act; or
 - vi. Entices a Student for pornographic purposes or gives gratification thereof.
- any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically or otherwise from the Sexual Abuse

4. Communication Confidentiality:

- a. A Member must not directly or indirectly cause any other person to collect, post, share, print or distribute any information including pictures, videos, personal details about any Student on any medium including social media in any form without his/her explicit written consent (in the cases wherein the Student is above the age of 18(Eighteen) years) or the explicit written consent of his/her parents/legal guardian (in the cases where the student is below the age of 18(Eighteen) years). Under no circumstances shall any Member directly or indirectly cause any other person to, post, share, and print or distribute any information including pictures or videos, personal details of any Student which are sexually provocative or sexually suggestive or in any manner denigrates the dignity of the Student
- b. The Member must not disclose private information of any Student to the public including on a public platform which may endanger the security and reputation of the Student and his/her family without the explicit written consent of the Student (in the cases wherein the Student is above the age of 18(Eighteen) years), his/her parents/legal guardian (in the cases wherein the Student is above the age of 18(Eighteen) years) and the written consent of the Organization. Use alias and generic language instead of actual names and details
- c. No story about any Student must be shared on any medium including social media which is not in the best interest of the Student. If a story is in the best interests of the Student, the Member must take the Student's written consent (in the cases wherein the Student is above the age of 18 (Eighteen) years), or the consent of his/her parents/legal guardian (in case the Student is below 18(Eighteen) years of age) and share details of the medium in which said story will/may appear
- d. Routing any student information to be shared externally through the communications team only

5. Meetings:

- a. All meetings held by any Member with any Student must be held either at the registered/principal office of the Organization, the Member's office (during working hours) or at a public place with safe surroundings and ease of access. Alternatively, the meetings may be held at the premises of the Organization or at any other authorized place with the prior permission to the Organization.
- b. No meeting shall be held at the residences of a Member or Student, or at any other private residence/ space, under any circumstances, unless prior written permission is taken from the Organisation and the parents/legal guardian of the Student.

6. Scope of Application of the Student Protection Policy:

This SPP is applicable to all part time and full time employees and consultants

(including but not limited to Staff, Facilitators, Interns) of Antarang Foundation and any other person who has been bound to the Student Protection Policy as per their contractual agreement with Antarang Foundation.

7. Expected Behaviour and Actions Prohibited Behaviour and Actions:

DOs	DON'Ts
Treat every Student with empathy and respect, regardless of his/her race, colour, gender, sexuality, language, religion, religious belief, heritage, political/other opinion national/ethnic/social origin or culturally insensitive.property/disability/birth/other status.	Do not use language or behaviour towards Students that is inappropriate, harassing, abusive, sexually provocative, demeaning,,intimidating, offensive, discriminatory or culturally insensitive.
Listen to students and respect their views.	Do not develop, induce or support physical or sexual relationships with Students, in any way.
Ensure that physical contact with a student is respectful, culturally appropriate and essential to the purpose of your interaction with the student.	Do not use any form of corporal punishment on students.
Establish an atmosphere that fosters the development of students through your actions and words.	Do not place a student at risk of harm or abuse and do not harm or abuse any student physically,emotionally or sexually.
<p>Always take permission from students before taking their photos or videos.</p> <p>Keep all personal information about students or their parents/guardians confidential and secure and ensure that such information is dispensed to only those individuals who are legitimately entitled to it.</p>	Do not share with or show students (electronically or in any other form) inappropriate content including pornographic material or material encouraging crime, violence, terrorism, racism, sexism, self-harm, suicide, cruelty and gambling. Ensure that audiovisual content shared as part of classroom learning is also age, context and culturally appropriate.
Attend all the applicable training sessions and workshops on the SPP and Child-related laws conducted by the Organization. Ensure you implement the lessons learned from	Do not use or encourage the use of alcohol, drugs, cigarettes or other intoxicating substances while interacting with Students. Do not provide such

such sessions and workshops.	intoxicating substances to Students
	Do not develop any form of relationship or arrangement (financial or otherwise) with students which could in any way be deemed to be exploitative or abusive. Do not use Child labour in any form.

8. Reporting and Redressal of Student Abuse Complaints

Guidelines for Complaint Redressal Mechanism

Scenario 1: Where the alleged victim is any student enrolled in any of Antarang Foundation's program and the alleged offender is a Staff/Facilitator/Intern/Consultant/

In case of any of the things mentioned below it will be considered as violation of the Student Protection policy	Responsibility for resolving the situation: Student Protection Officer
<ul style="list-style-type: none"> ● Corporal punishment of a Student: Smacking ● Use language or behaviour towards Children that is inappropriate, harassing, abusive, demeaning, intimidating, offensive, discriminatory or culturally insensitive. ● Discrimination of any kind against a child (eg: race, gender, ethnicity, minority) ● Punishment in the form of humiliation: Duck-walking, Humiliating in the form of comparison (eg: taunting a child for struggling in class or publicly labeling him/her as a <i>lower order child</i>) 	<ul style="list-style-type: none"> ● The complaint is registered with the SPO ● The SPO will inform the reporting manager ● The reporting Manager will take necessary steps to change the behaviour ● Consequences range from, but are not limited to, awareness-building, conversations, counseling under a formal support plan. If there is a violation of the support plan, this may result in a formal warning letter. If the violation is repeated, this could result in termination. ● On closure of the case (change or stopping of behaviour), the reporting Manager will close the case formally with the member and the SPO via email copying his/her manager
<ul style="list-style-type: none"> ● Corporal punishment of a Child: Severe or repeated beating 	<ul style="list-style-type: none"> ● The complaint is registered with the SPO

<ul style="list-style-type: none"> ● Illegal adoption of a Child or facilitating or promoting such adoption ● Employing or using a Child for begging ● Giving a Child intoxicating liquor, narcotic drugs, tobacco products or psychotropic substances or using a Child for vending, peddling, carrying, supplying or smuggling liquor, drugs or such substances ● Abandoning a child under your care or neglecting a Child or committing other forms of cruelty towards a Child ● Employing a Child below fourteen years of age in any occupation or employing a Child between fourteen and eighteen years of age in any hazardous occupation ● Marrying a Child or promoting or solemnizing a Child marriage ● Assaulting, Kidnapping, abduction, trafficking, murder, sale and procurement for any purpose, abetment of suicide of a Child and other offences affecting the body of a Child ● Producing, publishing or transmitting sexually explicit material in relation to a Child electronically, facilitating online abuse of a Child or other Child-related cybercrimes ● Sexual assault/abuse of children 	<ul style="list-style-type: none"> ● The SPO will inform the reporting manager to keep them in loop ● Consequences may include formal reporting under the respective laws ● These actions constitute gross misconduct and will most likely lead to termination but may involve a formal letter and counselling depending on the context ● The SPO may choose to bring in an external partner to handle the case keeping the CEO in loop ● On closure of the case (change or stopping of behaviour), the reporting Manager will close the case formally with the member and the SPO via email copying his/her manager
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Scenario 2: Where the alleged offender can be anybody and the victim is any child and where the offence is one of sexual abuse

Reporting of Child abuse: The Complainant shall send the Child abuse complaint to the SPO within 24 hours of receiving the information of abuse. This can be through the email, or in writing in the format provided in the policy under 9.REPORTING CHILD ABUSE COMPLAINTS

- The SPO is responsible for ensuring that relevant members are kept in the loop regularly.

- Complaint of such nature will be taken forward by abiding by the POCSO Act.

Scenario 3: Where the alleged offender can be a student and the victim is staff/intern/facilitator/consultant/volunteer

Nature of the Abuse	Action to be taken
<ul style="list-style-type: none"> • Use language or behaviour that is inappropriate, harassing, abusive, demeaning, intimidating, offensive, discriminatory or culturally insensitive. • Discrimination of any kind (eg: race, gender, ethnicity, minority) 	Facilitators are encouraged to have conversation about these topics with the students. Can seek help from the reporting manager if required.
<ul style="list-style-type: none"> • Inappropriate touch or any form of physical abuse 	Report to the HM keeping the reporting manager in loop.

9. REPORTING CHILD ABUSE COMPLAINTS:

All complaints should be in written format to ensure documentation of the complaints.

Ensure the following information is covered in the written complaint.

Subject: Complaint: Reporting Child abuse.

1. Details of the Complainant

- a. Name:
- b. Phone number:
- c. Email ID:
- d. I am (Please select one): Antarang Foundation Staff Member, Antarang Foundation Facilitator, Antarang Foundation Volunteer, Antarang

Foundation Intern, Antarang Foundation Student

e. Place of work:

f. Nature of the Complainant's association or relationship with the alleged victim:

2. Details of the alleged victim(s)

a. Name:

b. Gender:

c. Age:

d. City:

e. Educational Institute:

f. Class/Grade:

g. Names of the parents/guardians of the alleged victim:

h. Address of the parents/guardians of the alleged victim:

i. Phone numbers of the parents/guardians of the alleged victim:

3. Details of the Incident

a. Nature of the Incident (Please select one):Facilitator/Staff to Students,
Student to Student, Non Antarang Foundation| Adult to Students

b. Description of the Incident:

c. Frequency of the Incident:

d. Date of the Incident:

e. Location of the Incident:

f. Name of the alleged offender:

g. Names of the witnesses to the Incident:

h. The Complainant's response to the Incident:

4. Signature of the Complainant

a. Signature:

b. Date:

c. Place:

10. Obligations of the Members & Students:

- a. Members shall follow all the obligations under this Policy
- b. Members who either directly or indirectly come to know/are acquainted with any activity/omission which constitutes or results in Abuse or has the potential of resulting in Abuse or which they suspect of either being or potentially resulting in Abuse towards any of the Students, is obliged to report the same forthwith to the Student Protection Officer
- c. Members recognize and agree that Antarang Foundation shall have the right to take any action as it deems fit (not to the exclusion of any of its right under the service rules as applicable to that Member) if any of the Members are found in violation of any of the obligations under this Policy
- d. Students are encouraged to disclose and promptly report all genuine cases of Abuse including Physical, Emotional and Sexual Abuse against themselves or against their peers

- e. Antarang Foundation has the right to take all such actions as it may deem fit including termination of the Student's enrolment if the Student brings forth any false, frivolous or malicious complaint alleging the violation of this Policy against any innocent Member
- f. It is important for all Members in contact with Students to:
 - Be aware of situations which may present risks and manage the same with utmost professional standards;
 - Plan and organise the work and the workplace so as to minimise risks;
 - As far as possible, be visible and approachable while working with Students;
 - Ensure that a culture of openness exists at the Organization to enable any issues or concerns to be raised or discussed;
 - Ensure that a sense of accountability exists at the Organization so that poor practice in a similar setting or potentially abusive behaviour can be avoided.

11.. Maintenance of Records of Abuse Complaints

The Organization will maintain a complete record of each Abuse complaint and the manner in which it is investigated and resolved, including any written responses from Student and/or alleged offender. All such written records will be maintained in a confidential manner, for at least [3 (three)] years from the date of the resolution, or longer if the circumstances so require.

12. Non-Waiver of Statutory Rights

- a. This Policy does not constitute a waiver of any of the statutory and common law rights of Antarang Foundation and the Members, and it shall be open to both parties to exercise any of their legal rights.
- b. Nothing contained in this Policy shall prejudice any right available to or prevent any person from seeking any legal remedy under applicable law for the time being in force in relation to the Abuse faced by such person.

13. Addendum to Antarang's Student Protection Policy: Cyber Security

The current Covid 19 crisis has accelerated the shift to digital mediums of interaction. Technological advances over the last decade have led to the availability of numerous tools for digital engagement. Antarang Foundation has rapidly pivoted to digital mediums to deliver its programs. The young people Antarang works with have been the quickest to adopt these new technologies.

This document below has looked at the additional vulnerabilities that have emerged as a result of using digital technologies for interactions that we must be mindful of.

- a. Always maintain digital etiquette. Digital etiquette is about being aware of and behaving in an appropriate, responsible and ethical manner while using digital devices and technology. It includes you as well as for those around you that might be visible/audible to other participants via your device.
- b. Ensure that you and those around you are appropriately dressed.
- c. If there is teasing going on while it could be playful, if one person asks for it to stop, ensure you or whoever is involved does so.
- d. Ensure any personal data such as pictures, phones nos, email ids etc that have been made available to you are not shared or stored beyond the purpose you were given access to them for.
- e. If you feel upset about reading/hearing a message or comment, resist the urge to retaliate and instead reach out to the Antarang's HR team and inform them of the incident.
- f. redirect them to the Antarang Team and/or share details of CHILDLINE 1098, India's 24-hour, free, emergency phone service for children in need of aid and assistance. A child or any adult on his or her behalf can dial 1098, the toll free number to seek help for emergency needs and to avail of long-term care and rehabilitation services.

I have read the above Student Protection Policy and agree to abide by the same at all times that I represent Antarang Foundation in any capacity.

Name:

Position:

Signature:

Date: