



SAMBHOTA TIBETAN SCHOOLS SOCIETY

(Registered under the Societies Registration Act)

**Under the Department of Education(DoE),
Central Tibetan Administration (CTA), Dharamsala**

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STSS CHILD PROTECTION POLICY - 2026

STSS HEADQUARTERS

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Article I: Policy Statement, Preamble, and Jurisdictional Framework

- 1.1 Preamble:** The Sambhota Tibetan Schools Society (STSS), under the Department of Education, Central Tibetan Administration (CTA), hereby establishes this comprehensive, legally binding Institutional Child Protection Policy (hereafter referred to as the "**Policy**"). STSS recognizes that children are uniquely vulnerable and declares that ensuring a safe, nurturing, secure, and protective environment, both within academic campuses and residential facilities, is a non-negotiable organizational mandate.
- 1.2 Zero-Tolerance Declaration:** STSS maintains an absolute zero-tolerance stance toward all forms of child abuse, sexual exploitation, physical or corporal punishment, emotional abuse, mental harassment, cyber-bullying, and systemic neglect. No cultural context, administrative expediency, or institutional hierarchy shall justify a failure to uphold the absolute protection of a child.
- 1.3 Jurisdictional Subordination to laws of the host country:** While STSS serves the educational needs of the Tibetan diaspora community in India, it explicitly recognizes and declares its absolute adherence to the statutory laws of the Republic of India. This Policy is constructed to give full administrative force to the child protection principles enshrined in the Constitution of India, the Protection of Children from Sexual Offences (POCSO) Act, 2012, the Right of Children to Free and Compulsory Education (RTE) Act, 2009, the Juvenile Justice (Care and Protection of Children) Act, 2015, the Information Technology Act, 2000, and the statutory directives issued by the National Commission for Protection of Child Rights (NCPCR) and respective State Commissions (SCPCR).
- 1.4 Prevention of Sexual Exploitation and Abuse (PSEA) Mandate:** STSS maintains a zero-tolerance threshold for any form of Sexual Exploitation and Abuse (SEA) by Covered Personnel against students, beneficiaries, or their families.
- **Prohibition of Power Exploitation:** Covered Personnel are strictly prohibited from utilizing their institutional authority, administrative position, or control over school resources, including but not limited to academic grading, admission

approvals, hostel/boarding placements, financial aid, or material assistance, to solicit, coerce, or exchange personal or sexual favors.

- **Transactional Misconduct:** Any attempt to condition an institutional benefit or a child's educational advancement upon personal compliance or relationship favors constitutes a severe, non-remediable PSEA violation.
- **Enforcement:** A violation of this mandate bypasses standard progressive discipline and shall result in immediate administrative suspension, formal contract termination, and a mandatory referral to local law enforcement authorities under the statutory frameworks of the host country.

1.5 Scope of Application: This Policy applies to all STSS-administered schools, day schools, residential hostels, and administrative offices. It legally binds all regular employees, contractual staff, guest teachers, daily wagers, administrative personnel, hostel wardens and matron/Ayachs, security personnel, volunteers, interns, stakeholders, and third-party service providers (collectively referred to as "***Covered Personnel***").

Article II: Statutory Legal Definitions

To eliminate administrative ambiguity or personal interpretation, the following definitions are adopted verbatim from Indian jurisprudence and shall govern all institutional proceedings:

- **The Child:** Any individual who has not completed the age of eighteen (18) years, as defined under Section 2(1)(d) of the POCSO Act, 2012, regardless of nationality, legal status, or community affiliation.
- **Corporal Punishment and Mental Harassment:** Any action that causes physical pain, injury, discomfort, or psychological trauma to a child as a method of discipline, reprimand, or enforcement. This includes striking, slapping, kicking, forcing strenuous physical postures, verbal degradation, public shaming, isolation, or academic discrimination, strictly prohibited under Section 17 of the RTE Act, 2009.
- **Child Sexual Abuse (CSA):** Any act of a sexual nature committed against a child, including penetrative sexual assault, non-penetrative sexual assault, sexual harassment, or exposure to pornographic or sexually explicit material, as defined comprehensively under Sections 3, 5, 7, and 9 of the POCSO Act, 2012.

- **Mandatory Reporter:** Every individual categorized as Covered Personnel under this Policy is legally designated an institutional mandatory reporter. Under Section 19 of the POCSO Act, any person who possesses knowledge or a well-founded suspicion that a child has suffered or is at risk of suffering sexual abuse is legally bound to report the matter immediately to the Special Juvenile Police Unit (SJPU) or the local police. Institutionally, personnel must notify the Child Protection Committee (CPC) immediately and concurrently to initiate internal safeguarding protocols and assist with the formal reporting process.
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Article III: Institutional Mandatory Code of Conduct

All Covered Personnel must adhere to strict boundary thresholds. The operational rules below define clear indicators for professional conduct versus prohibited boundary violations:

- **Meetings & Sessions**
 - *Mandatory:* With the consent of the competent authority, conduct all meetings, remedial classes, and counseling sessions in open, highly visible, and visually transparent settings.
 - *Prohibited:* Spend isolated, unmonitored time alone with a student behind closed, locked, or obscured doors or in staff quarters.
- **Communications**
 - *Mandatory:* Use only official, institutional emails, designated institutional platforms (such as Google Classroom), or official communication channels for academic interactions.
 - *Prohibited:* Interact with students via personal social media profiles (Instagram, Snapchat, Facebook, WhatsApp, etc.) or through private, personal phone calls.
- **Travel & Off-Campus Visits**
 - *Mandatory:* Document and secure prior written administrative authorization and formal parental consent for all off-campus field trips or excursions.
 - *Prohibited:* Invite or host students at private personal residences, or transport students in personal vehicles without official, written institutional clearance.
- **Photography & Media**
 - *Mandatory:* Restrict all photography and recording of students to official school cameras for pre-approved institutional publications with clear parental media waivers.

- *Prohibited:* Capture, store, or share photographs, videos, or audio recordings of students using personal smartphones, tablets, or unauthorized devices under any circumstances, except where such recording is required for approved educational activities and has received prior approval from the competent authority.
(*Posting of such content on social media platforms is strictly prohibited.*)

Article IV: Personnel Vetting, Screening, and Recruitment Controls

To deny entry to individuals who pose a threat to child safety, STSS mandates a strict multi-tiered vetting framework for all recruitment processes:

- 4.1 Mandatory Police Verification:** No applicant or candidate shall be formally appointed, deployed, or allowed regular entry into an STSS facility without submitting a verified, current Police Clearance Certificate (PCC) from their local jurisdiction verifying a clean criminal and service record.
- 4.2 Third-Party Vendor Bindings:** Every contract, memorandum of understanding, purchase order, work order, service agreement, consultancy agreement, transport agreement, construction contract, security services agreement, catering agreement, or any other engagement with a third party whose personnel may enter or access STSS premises shall incorporate the *STSS Statutory Child Safeguarding clause for Third-Party Contractors and Service Providers* as an integral and binding part of the agreement. Compliance with such requirements shall be a condition precedent to deployment and a continuing contractual obligation throughout the term of the engagement. Any breach shall constitute a material breach entitling STSS to suspend or terminate the engagement immediately, without prejudice to any civil, criminal, or other legal remedies available under applicable law.

Note: *STSS Statutory Child Safeguarding Clause for Third-Party Contractors and Service Providers.*

Annexure - A

Article V: Campus Environment and Infrastructure Controls

In accordance with the physical environment mandates issued under the NCPCR School Safety Manual, all STSS campuses must strictly operationalize the following structural standards:

- **Restroom Segregation Matrix:** All campuses must build, label, and safely maintain completely independent, secure washroom infrastructure for:

(a) Female Students, (b) Male Students, and (c) Adult Staff and Visitors. Staff members, contractors, and visitors are strictly prohibited from using student facilities.

- **Surveillance Systems:** High-definition CCTV networks must maintain uninterrupted monitoring over corridors, perimeter walls, entry/exit gates, and outdoor blind spots. Archival video logs must be securely preserved for a minimum of sixty (60) days. *CCTV cameras are completely illegal inside restrooms, changing rooms, and private hostel dormitories.*
- **Access Control and Visitor Registry:** Entry onto school premises must be tightly funneled through a monitored gate log system. All visitors must submit identification and state an explicit purpose. No visitor may traverse student zones unaccompanied.

Article VI: Institutional Enforcement Body – The Child Protection Committee

- 6.1 Mandatory Mandate:** Every STSS academic institution and residential facility must maintain an active, fully authorized internal administrative body titled the Child Protection Committee (CPC). The CPC is tasked with local policy enforcement, regular safety risk mapping, child rights awareness delivery, and incident management.
- 6.2 Composition Framework:** To maintain impartiality and prevent institutional collusion, the CPC must possess the following structured membership:
- 1. Chairperson:** Head of Institution.
 - 2. Internal Representatives:** One Senior Female Teacher and one Senior Male Teacher.
 - 3. Pastoral Representative:** The School Counselor, or in their absence, a resident Medical Officer or a Parent representative of the PTA.
 - 4. Independent External Member:** A practicing attorney specializing in juvenile justice, a certified child rights activist, or a senior representative from an independent, registered child welfare Non-Governmental Organization (NGO). The inclusion of this external voice is a mandatory statutory shield to ensure complete transparency.

Article VII: Criminal Standard Operating Procedure (SOP) and Timelines

When an allegation of child exploitation, sexual abuse, or systemic violation is brought forward, the local CPC must follow this zero-deviation statutory timeline. Any administrative deviation, delay, or failure to act constitutes an actionable breach of law:

Phase 1: Immediate Safety and Documentation (Hour 0 to Hour 2). Upon receiving a disclosure or observation, the receiving staff member must log the statement verbatim without altering any terms, cross-examining, or interrogating the victim. The child must be gently placed in a safe environment under the immediate care of a female staff member or counselor. Complete confidentiality regarding the identity of the victim and details of the case must be maintained to prevent social stigmatization.

Phase 2: Administrative Separation and Support Measures (Hour 2 to Hour 6). If the accused party is an employee, contractor, or vendor under the jurisdiction of STSS, the Chairperson of the CPC shall issue an immediate suspension or administrative ban barring the individual from entering campus grounds or contacting any students. The school counselor must immediately begin emotional and psychological support protocols for the child.

Phase 3: Statutory Criminal Notification (Strictly Within 24 Hours). If the case involves an offense falling under the scope of the POCSO Act, 2012, **the Chairperson of the CPC is legally mandated to report the incident to the local Special Juvenile Police Unit (SJPU) or local police within 24 hours of disclosure.** The CPC has no legal jurisdiction or authority to verify evidence, delay reports for internal investigations, or seek administrative settlements. *Failing to file a police notification within this 24-hour limit is a punishable criminal offense for school management under Section 21 of the POCSO Act.*

Phase 4: Central Escalation and Legal Coordination (Within 24 Hours). Simultaneous to police notification, a confidential, structured incident file must be securely transmitted to the *Legal and Vigilance Cell at the STSS Headquarters, Dharamshala*, ensuring centralized institutional monitoring and alignment with the Child Welfare Committee (CWC).

Article VIII: Enforcement, Penalties, and Auditing

8.1 Severe Administrative Penalties: Any Covered Personnel found to have committed corporal punishment, mental harassment, or child safeguarding omissions shall face immediate, non-appealable suspension or termination of employment, forfeiture of

institutional terminal benefits, and direct transfer to the custody of law enforcement agencies.

8.2 Grievance Infrastructure: Every school campus must install dedicated, secure, child-accessible "Child Protection Boxes." These boxes must be positioned in areas free from camera surveillance or staff monitoring and must be unlocked and evaluated exclusively by the designated CPC head weekly.

8.3 Institutional Safety Audits: The STSS Headquarters, in coordination with independent external safety monitors, shall perform unannounced child protection compliance audits across all educational branches. This policy document is a living statutory text and must undergo complete formal evaluation and legal revision biennially (once every two years) or **as and when necessary** to maintain absolute alignment with changing national child protection laws.

8.4 Whistleblower protection: STSS guarantees absolute confidentiality and protection from retaliation, academic victimization or administrative backlash for any student, parent or staff member who reports a suspected safeguarding violation or participates in an audit/investigation in good faith.

This institutional child protection policy is hereby formally adopted and shall enter into immediate effect as of **17th July 2026**

Authorised Signatory:

Director, STSS



Date of Enactment: **17th July 2026**