

Entrance Coach Educate LLP

(entrancecoach.com / ENTRANCE COACH EDUCATE .ORG/ Entrance Coach Educate llp.org)

CHILD SAFETY POLICY

Online # child safety first principles in action

Child safety policy version 1.0					
Version	Proposed by	Reviewed by	Approved by	Effective date	Modifications
1.0	Lakshmi (HR)	Sreekala (Internal member – Child safety steering committee)	Varughese George (Chief innovation officer)	12- Aug -2022	None

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Part A

Online child safety first principles in action

Policy statement

Entrancecoach.com / entrancecoacheducate LLP is India's leading online tutoring company which enables students to learn live with some of India's best curated teachers. Entrancecoach.com / entrancecoacheducate LLPs online tutoring platform enables live interactive learning between a teacher and a student.

At Entrancecoach.com / entrancecoacheducate LLP, we acknowledge and affirm that children have an absolute right for a safe environment, that is also conducive to their all – round growth; and that we are committed to provide the same. We pledge to create and nurture an environment on the fundamentals of ethical practices and responsible behavior towards each child and in their best interest.

Through this policy, we undertake to adopt dedicated methods of prevention of any sort of child abuse including responsible modes of employing persons in the organization, creating awareness on the policy in the

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organization, developing & upgrading technological solutions and ensuring adherence to the mandates of the policy by each of our stakeholders.

We are further committed to have a sensitive and efficient redressal mechanism that would address each concern that may be raised, in a time bound and effective manner, with no tolerance to any act of child abuse

It is a firm belief of each of us at entrancecach.com that only a convergence of our thoughts, intention and action in this regard would lead us in the path of achieving the objective of this policy.

II Scope

This policy is applicable to all persons and organizations associated with Entrancecoach.com / entrancecoacheducate LLP, referred to as Entrancecoach.com / entrancecoacheducate LLP's Stakeholders, including:

- i. Employees of Entrancecoach.com / entrancecoacheducate LLP, who maybe full-time or part-time employees, permanent or temporary employee, regular permanent employee or employed on contract
- ii. Organizations and persons belonging to that organization, who may partner and/ or work with Entrancecoach.com / entrancecoacheducate LLP in any capacity, even for a limited time period or job
- iii. Volunteers who may work with Entrancecoach.com / entrancecoacheducate LLP, in whichever capacity, even for a limited period of time

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- iv. Children enrolled as students of Entrancecoach.com / entrancecoacheducate LLP and their parents or guardians who associate with the child in the official records of Entrancecoach.com / entrancecoacheducate LLP
- v. Children who may not be enrolled but are reached out through marketing or sales of the product and their parents or guardians who associate with the Child
- vi. Any other person or organisations who may be officially associated with Entrancecoach.com / entrancecoacheducate LLP and its ambit of work and activity

In instances and circumstances where Entrancecoach.com / entrancecoacheducate LLP may not have required control over the person alleged of any concern under this policy, including an instance of child abuse, Entrancecoach.com / entrancecoacheducate LLP shall provide the required cooperation, assistance and support to such parent or guardian of the affected child, in approaching any external, legal mechanism including the Police and/or the Courts, though Entrancecoach.com / entrancecoacheducate LLP is itself not personally liable in such instances.

III Achieving child safety

Entrancecoach.com / entrancecoacheducate LLP declares that we shall make it mandatory for ourselves to follow these norms so as to achieve and nurture a safe and happy environment for each child who associate oneself with us.

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- Employ and hire persons with integrity and complete respect towards the right of every person for a safe environment free of abuse in general, and that of children in particular.

Declaration to be each person to be employed by entrancecoach.com / entrancecoacheducate LLP is in annexure 1

- Make the child safety code a necessary part of an employment agreement and a contract with any individual including parents or guardians of student or organization to be associated with entrancecoach.com / entrancecoacheducate LLP, and further to strictly treat a breach of such code of conduct as a misconduct, further subjected to an inquiry and action against such misconduct.

Child safety code of conduct is listed in part B (1) of the policy

- Create awareness among all entrancecoach.com / entrancecoacheducate LLPs stakeholders through various, timely and periodic programme, including sessions and any other creative methods of sensitizing and spreading awareness on aspects of child safety.
- Update the security measures pertaining to online and internet based communication and interaction periodically to make sure that none of the medium is misused.

Preventive measures are listed in part B (II) of the policy

- Formulate a redressal mechanism, wherein we shall have designated child safety champions and teams, who can be contacted easily and immediately in case of concern or complaint ; and a committee comprising of set of trained, sensitive experienced, responsible and responsive individuals as members who shall conduct inquiry in to each complaint raised and recommend appropriate actions.

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Redressal mechanism process is mentioned in part B (III) of the policy

- Have in house professional psychological counsellors who shall provide their expert services to any child who may require such services, whether due to an experience of abuse, or due to a challenging behavioral issue that needs to be addressed.

Redressal mechanism process is mentioned in part B (III) of the policy

- Ensure that any decision taken regarding any child is in their best interest, in terms of fulfilment of their basic rights, needs, identify, social well- being, physical, emotional and intellectual wellbeing.

IV Understanding Child Abuse

Child Abuse : Shall mean any form of a child, whether emotional, behavioral, verbal, physical, sexual, commercial or any other exploitation of a child and includes any action that results in actual or potential harm to child, whether done intentionally or unintentionally, in person or through phone or internet enabled virtual platforms.

A child is a person who has not completed eighteen years of age.

Types of child abuse

1. **Emotional Abuse:** Shall mean any persistent behavior involving ill treatment leading to the impairment of the child's emotional stability, health and development, which may occur independently or coupled

with any other manner of verbal, physical or sexual abuse. The need of physical contact is not a necessary factor in identifying emotional abuse.

Emotional abuse may include

- i. Bullying – acts of harassment, embarrassment, taunting, insulting or threatening behavior
 - ii. Stalking – repeated and persistent following
 - iii. Discrimination on grounds of sex, caste, religion, race, language or any other non –apparent ground
 - iv. Conveying to the child that she / he is inadequate, worthless or unloved
 - v. Preventing the child from normal social interactions
 - vi. Causing the child to be frightened or in danger
2. **Physical abuse:** shall mean any non- accidental act causing physical injury or impairment, pain or trauma to the child.
3. **Sexual abuse :** Shall mean, engaging in sexual activities with a child who, according to the relevant provisions of protection of children from sexual offences act, 2012 (POSCO Act) and Indian penal code, 1860, has not reached the legal age for sexual activities; and any sexual act, sexual contact, sexual harassment or sexual exploitation of a child, whether completed or attempted, whether through direct physical contract or through virtual platforms (mobile phone, online / internet – based platforms, computers etc..)

Sexual abuse may include:

- i. Sexual acts of penetration of the vagina or anus
- ii. Masturbation
- iii. Molestation
- iv. Touching breasts, vagina, penis with sexual intent
- v. Exposing or involving a child in pornography
- vi. Soliciting a child to engage in sexual activity
- vii. Sexual harassment: any physical, verbal, gestural, behavioral or emotional act with sexual intent that affects the child's emotional and mental health
- viii. Sexual exploitation: act of using the child for one's own sexual needs or using the child sexually for monetary or any other personal benefit

4. **Child to child abuse:** concerns that may be raised about the abuse of a child by another child shall be responded to with sensitivity, taking in to account the vulnerabilities of both the children involved. They shall however be dealt with through the child protection procedures, and in accordance with the provisions of juvenile justice (care and protection of children) Act, 2015. Dealing with abusive children requires a sensitive approach that would ensure protection of the affected child and supporting the child with abusive nature to address such behaviours.

Consensual sexual activity between two minors, through amounts to an offense as per the applicable laws, entrancecoach.com / entrance coach educate llp resolves to deal with such concerns sensitively, when raised with us, respecting both person's rights and vulnerabilities.

In any child – to – child abuse, entrancecoach.com / entrance coach educate llp is committed to support the parents and guardians of the child in whatever legal process that they want to approach. We shall also be providing professional counselling to the children involved.

5. **Sexual harassment:** shall mean any act, where any person harasses a child with sexual intent-
- i. Utters any word, makes sound, makes any gesture / exhibits any object or part of body to the child.
 - ii. Makes a child exhibit his body or any part of his body so as it seen by such a person or any other person
 - iii. Shows any object to a child in any form or media for pornographic purposes
 - iv. Repeatedly or constantly follows or watches or contacts a child either directly or through electronic, digital or other means.
 - v. Threatens using any form of media real, or fabricated depiction through electronic, film, or digital or any other mode, of any part of the body of the child or the involvement of the child in sexual act.
 - vi. Entices child for pornographic purposes or gives gratification

Abuse through virtual platforms or online abuse : any act of abuse whether verbal, emotional or sexual abuse, done through any virtual platform including but not limited to mobile phones, computers, tables be it through platforms conducting the online classes, emails, social media or personal chatting platforms.

Online abuse may include:

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- i. Bullying. Acts of harassment, embarrassment, and taunting, insulting or threatening behavior towards a child by using the internet, email or other electronic communication device.
- ii. Stalking. When a child is repeatedly and persistently followed and pursued online by email or other electronic communication
- iii. Online harassment: online harassment is used as an umbrella term to describe the use of the internet to harass, threaten or maliciously embarrass another party. It can be in the form of verbal, sexual, emotional, or social abuse and aimed at a person, a group of persons, or even an organization.
- iv. Unwanted exposure – when any person send pictures, videos, sounds, sounds clips, cartoons or animations depicting sexual contents by any electronic means.
- v. Pornography – Any visual depiction of sexually explicit conduct involving a child which includes photographs, videos, digital or computer – generated image indistinguishable from an actual Child and image created, adapted or modified, but appear to depict a child, and also includes any visual depiction which is sexual in nature which is shown to a child.

Important terms in a child abuse case

- i. **Victim**- shall mean, a child who is enrolled as a student of **entrancecoach.com / entrance coach educate llp** or has been reached out for enrollment and has been subjected to abuse as per Part A (IV) of this policy

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- ii. **Child abuser** – shall mean any stakeholder engaged with **entrancecoach.com / entrance coach educate llp** or any other person outside **entrancecoach.com / entrance coach educate llp**, who causes, initiates, supports child abuse as defined in Part A (IV) of this policy
- iii. **Incident** – shall refer to any incident of child abuse or potential child abuse and the term “incidents” shall be construed accordingly.

Part B

Ensuring learning environment

I. Child safety code of conduct:

entrancecoach.com / entrance coach educate llp expects all its stake holders falling within the scope of this policy [Part A (III)] to adhere to the following child safety code of conduct:

Expected behavior and actions

- i. Listen to the child and their views and opinions
- ii. Have a non – judgmental attitude
- iii. Treat every child with empathy and respect regardless of his /her race, color, gender, sexuality, religion, language, heritage, religious belief, social origin, or any point that discriminated child

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- iv. Use appropriate language, behaviors while interacting with the child
- v. Use appropriate language, behaviors while interacting with the child.
- vi. Create an environment that enables children to share and express freely
- vii. Always take permission and written consent from guardian before taking or videos of a child
- viii. Keep all personal information of children, their parents and guardians confidential and secure, such information shall only be shared with authorized individuals
- ix. The live online classes and the content, including but not limited to audio visual content is age appropriate and culturally appropriate
 - 1. Prohibited behaviors and actions
 - i. Do not develop, induce or support any emotional, online / offline physical abuse or sexual relationship with children in any way
 - ii. Do not use or encourage the use of alcohol, drugs, cigarettes or other intoxicating substance in any of your interaction with children.
 - iii. Do not develop any form of relationship or arrangement with children including but not limited to financial which could be deemed to be exploitative or abusive
 - iv. Do not share with or show children online / offline any inappropriate content including pornographic material or material that encourages crime, violence, racism, sexism, self – harm, suicide, cruelty
 - v. Do not use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning, intimidating, discriminatory, or culturally insensitive

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II. Preventive Measure

In order to prevent commission any form of child abuse entrancecoach.com / entrancecoacheducate LLP has laid down the following preventive measures and expects all its stakeholders to adhere them:

1) On –Boarding and Awareness: Employee /Student /Teacher / Vendor / Any other Stake holder

- i. All employees full time, part time including interns, volunteers, freelancers, parents or guardians and all vendors who have contractual obligations with **entrancecoach.com / entrance coach educate llp** shall sign the child safety policy of **entrancecoach.com / entrance coach educate llp**, and will be bound by this policy.
- ii. The key documents of students shall be collected / along with parents signatures, to have verified details of the students
- iii. All employees shall undergo child safety training and awareness
- iv. All children, parents / guardians shall undergo a short training and awareness on child safety
- v. Self – declare any previous case of criminal offence and child mistreatment / abuse as a part of application to **entrancecoach.com / entrance coach educate llp**.

2) Data collection privacy

- i. Any research or survey conducted will ensure safety of children, ie children are protected not harassed or traumatized in any way during the process by taking a consent.

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- ii. Data collected from children will not be shared and will be kept safe and secure, shared only with individuals who are authorized

3) Partnerships with technical experts for child safety

- i. Partnering with organizations to conduct age – appropriate sessions of safety of children
- ii. Partnering for child safety inputs for all cases and to have external advisory
- iii. Providing counselling both preventive and case specific counselling
- iv. Partnering with organizations in the space of child protection for effective implementation of the child safety policy

4) Technology solutions

- i. Developing and upgrading security measures to build systems for protecting data of children enrolled
- ii. Product related technology solution, like profanity filter for scrapping and preventing abusive material within the online learning platform.

III. Reporting and redressal mechanism

Entrancecoach.com / entrance coach educate llp has responsive and accessible designated persons and teams for the redressal of any concern or complaint that may be raised by anyone with regard to child safety.

In case a child feels uncomfortable or abused as defined in the child safety policy during the sessions / linked to the sessions or have come across any case of abuse or anyone who misbehaves or shows orderly / disorderly conduct, the child / child's parents / guardian can report the incident to the child safety champions or child

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safety teams through the helpline@entrancecoach.com or email at report@entrancecoach.com or online, in writing or voice record their message (with details of the class, screenshot of the incident and fill up the form as per annexure 2) mentioning the particular reason /s of their discomfort.

The internal reporting and redressal mechanism committee shall comprise of : child safety champions (CSC), Child safety team (CST), internal steering committee(ISC).

Child Safety Champions (CSC)

They are the key persons across the organization / within each department of entrancecoach.com / entrance coach educate llp, who execute and ensure compliance of the child safety policy within their respective departments. The CSC from each department shall be the primary person to reach out for reporting a case and sharing the process of redressal.

The child safety team (CST)

The child safety team set up at the central level, is the team that receives complaints, and will address the cases, based on the guidelines for redressal. This will be constituted by individuals with a professional expertise in the area of social work, counselling and experience of handling cases of sexual abuse / online sexual exploitation and lawyer. This team will report to the internal steering committee. This is the key operational team

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set up within entrancecoach.com / entrance coach educate llp, that will proactively conduct training , awareness programs, and ensure redressal of cases in the most effective way of possible.

Internal Steering Committee (ISC)

This is the apex team set up of internal team members and external advisor /s, who will be the final authority for deliberation, safeguarding execution, compliance and protecting the interest of te child and that of the policy at all times. The committee set up will support the **child safety team**, to decide the actions for the cases. In case of dispute of decision, the final decision will be taken by a neutral party, the external advisor representing this steering committee.

Detailed copy of guideline tot redressal mechanism can be obtained on a special request to the **child safety team** or **safety champion**

As per sections of the POSCO Act, every person who suspects or has knowledge of the commission of a sexual offence I required to report such offence. Also, any person making false complaints or providing false information against any person with respect to a sexual offence under the POSCO act I punishable with imprisonment or fine or both under the act.

In this context, all employees of entrancecaoch.com / entrance coach educate llp are mandated to report any case to any one mentioned in part B (III) of this policy.

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This policy has been drafted after referring all the existing child related laws (Annexure 3), policies and documents published by the Government of India. In case of any conflict the latter shall supersede.

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