

GSAM Child Protection Policy

The Good Shepherd Agricultural Mission (GSAM) & Maxton Strong School (MSS)

V4.3 — Updated 17 Oct 2025

Who we are

GSAM operates family-connected school hostels with the consent and ongoing involvement of each child's legal guardian. We are not a Child Care Institution (CCI) and we do not facilitate adoption. This policy sets clear standards to keep children safe across GSAM, the School, hostels, farm/workshop, and any GSAM-run program or activity.

1) Purpose & Principles

Purpose. To prevent abuse, respond quickly to concerns, and create a safe environment for all children connected to GSAM.

Principles.

- Children's safety and dignity come first; do no harm.
- Listen, believe, protect: take all concerns seriously.
- Proportional, practical measures—realistic for our setting.
- Transparency in decisions, records, and follow-through.
- Law-aligned: POCSO Act 2012 (mandatory reporting), relevant JJ/education laws, IT/digital safety rules.

2) Scope & People Covered

This policy applies to everyone on our campus or acting for GSAM: Board, leadership, all staff, teachers, hostel in-charges, volunteers/skills-share residents, contractors & vendors, service providers, interns/trainees, photographers/press, visitors/day guests, and partner organisations while on GSAM sites or activities (on or off campus).

3) Roles, Contacts & Responsibilities

Overall accountability: GSAM Director(s).

Child Protection Officer (CPO): Priscilla Shipway — 9557080756 (available after hours)

Deputy CPOs: Paula Karada — 8192955649; Rhoda Chand — 7895581191 (both available after hours)

Everyone must: follow this policy; maintain appropriate boundaries; report concerns immediately.

Leads/Managers must: ensure safer recruitment, onboarding, supervision, and prompt response to concerns.

CPO/Deputies must: receive reports; make immediate safety plans; escalate to authorities where required; maintain confidential records; track actions to closure.

Emergency/External:

Police 112; Childline 1098; Local CWC (Child Welfare Committee); nearest hospital/ambulance as appropriate.

4) Code of Conduct (Adults & Older Youth Helpers)

Always

- Treat every child with respect; be patient, calm, and clear.
- Keep interactions observable and interruptible (doors open/windows visible).
- Use age-appropriate language and topics; encourage group settings.
- Gain informed permission for activities, off-site trips, and media.
- Record and report any concern, injury, or disclosure immediately.

Never

- Hit, shame, humiliate, or use physical discipline.
- Be alone behind closed doors with a child; enter dorms without a second adult.
- Transport a child alone in a vehicle (unless emergency—then inform CPO immediately).
- Give personal gifts/cash to a child/family, or request gifts from them.
- Engage in sexualised talk, jokes, content, or any romantic/sexual contact.

- Show or discuss religiously or politically persuasive content with minors.
- Take children off campus without written permission and staff oversight.
- Consume alcohol/drugs on duty or be impaired around children.

Two-Adult Rule. Where practicable, ensure two approved adults are present (or nearby/visible) during any one-to-one interaction, including mentoring, tutoring, or pastoral care. Document exceptions (e.g., first aid).

5) Safer Recruitment & Screening

We recruit and engage people with child safety in mind. Minimum requirements per category:

5.1 Staff (incl. teachers, hostel, admin)

- Identity document(s) and recent photo.
- Police verification (or equivalent lawful background check).
- Two written references checked by phone.
- Induction on this policy before unsupervised contact.
- Probation period with closer supervision.

5.2 Skill-Share Residents (time-bound, on-campus)

- Identity and visa checks (as applicable); interview (online or in person).
- References; no unsupervised access until onboarding complete.
- Where appropriate: police check or Working With Vulnerable People card (e.g., Australians).
- No single men accepted (general rule; rare exceptions require Director approval and enhanced controls).
- Sign Visitors/Residents Agreement and accept Code of Conduct.

5.3 Contractors & Vendors (including casual labour)

- ID check and vendor screening; simple reference check (where feasible).
- Briefing on site rules; no unsupervised access to children.
- Work areas planned to avoid child contact wherever possible.

5.4 Visitors & Day Guests

- Sign-in, ID presented, host named, reason for visit.
- Chaperoned in child areas; no photos without permission.
- No direct gifts to children/families.

5.5 Photographers/Media/Press

- Pre-approved brief; media consent process; child-safe shot list.
- Chaperoned; no identifying details (full names/addresses) without written consent.

6) Boundaries in Practice

- Dormitories/Bedrooms/Bathrooms/Changing areas: strictly no photography, and entry only for authorised staff; visitors enter only with staff present and for a valid reason.
- Transport: avoid one-to-one; if unavoidable (e.g., medical), notify the CPO and record.
- Physical contact: supportive, child-initiated and appropriate (e.g., a brief side-hug with younger children), never secretive or for adult comfort.
- Off-site activities: written parental/guardian consent; risk assessment; approved ratios and first-aid.

7) Digital Safety, Media & AI

Devices & Online Conduct

- Children's device access is supervised and filtered where possible.
- Staff/Residents do not DM minors privately; use approved channels/groups with another adult visible.
- No recording (audio/video) in bathrooms, dorms, clinic, or other sensitive spaces.

Photos, Media & Children's Data

- No photos/videos of children without prior staff approval and, where required, written consent.
- Avoid full names, addresses, precise locations, and geo-tags; remove content if GSAM requests.

- No face recognition, dataset building, AI generation or voice cloning using any GSAM child's image/audio.
- Do not store children's personal data on personal devices beyond what's approved; secure delete upon request.

Drones & Airspace

- No drone use on/over campus without written GSAM approval and compliance with DGCA rules.

8) Money, Gifts & FCRA-Aligned Practices

- Do not give cash or personal valuables directly to children or families.
- Group items (stationery/snacks) only with staff approval.
- Foreign visitors must not make cash payments or give foreign currency on campus.
- All donations go through official GSAM channels (electronic/partner platforms) with receipts.
- Do not solicit money from children/families; do not accept undisclosed gifts from them.

Visa/FRRO (International Visitors/Residents)

International visitors must hold the correct visa for the activities undertaken (no NGO work on tourist/business visas). FRRO registration must be completed where required by law. GSAM can issue invitation letters where appropriate. Visitors must comply with all Indian immigration/local registration requirements.

9) Recognising & Responding to Concerns

What to report (examples)

- Any disclosure from a child; observed or suspected abuse/neglect.
- Inappropriate adult behaviour, grooming indicators, boundary violations.
- Injuries inconsistent with explanation; frequent absences/withdrawal; radical changes in behaviour.
- Online harms: sexualised messaging, bullying, coercion to share images.

How to report (simple steps)

1) Ensure immediate safety. If a child is at risk, remove them to a safe space and call for help.

2) Inform the CPO/Deputy now (in person/phone). If they are unavailable and it's urgent, contact Police 112/Childline 1098.

3) Write a brief factual note within 2 hours using the Incident Form (Appendix B). Record: who/what/when/where; exact words if disclosed; your actions.

4) Do not investigate yourself. Do not promise secrecy; say you must keep them safe and may need to tell others who can help.

POCSO & External Escalation

Allegations or reasonable suspicion of sexual offences against a child are reported to Police/Childline without delay as required by law. The CPO facilitates this and informs the Director(s).

Support & Protection

GSAM will protect reporters in good faith from retaliation. We will make immediate safety plans for any child at risk and, where relevant, inform the child's guardian.

Confidentiality

Keep details need-to-know only. Store records securely (see Section 11).

10) Managing Adults of Concern

- Immediate relief from duty/access pending assessment.
- No contact with the child/whistle-blowers.
- Cooperate with authorities.
- Document steps and outcomes; communicate appropriately with stakeholders.

11) Records & Privacy

- Incident and safeguarding records are kept securely by the CPO for 7 years (or longer if required by law/case).
- Access is restricted to CPO/Director(s) and legal authorities when required.
- Personal data handled per Indian privacy norms and good practice; only what is necessary is kept.

12) Training & Implementation

- Induction: All staff/residents receive a briefing on this policy and reporting steps before working with children.
- Annual refresher (short, practical) for staff/residents as feasible.
- Key rules displayed as a 1-page Quick Rules poster (Appendix A) in visible areas.
- Visitors receive a short briefing and sign relevant agreements at entry.

13) Complaints & Whistle-blowing

- Concerns can be raised to the CPO/Deputies or Director(s).
- Anonymous written concerns may be submitted via locked Complaint Boxes placed in non-CCTV areas on campus.
- We accept anonymous reports, but more detail helps us act.
- Retaliation against complainants is prohibited.

14) Policy Governance

- Owner: Child Protection Officer.
- Approval: GSAM Leadership/Board.
- Review: Annually at the AGM or sooner if required by changes in law or incidents/learning.
- Related documents: Visitors/Residents Agreement; Staff Handbook; Media Consent; Trip/Excursion Forms.

15) Acceptance

All staff, residents, contractors, and regular visitors must read, understand, and comply with this policy and the Code of Conduct. Breaches may result in disciplinary action, termination of access, and/or referral to authorities under applicable law.

Appendices

Appendix A — Quick Rules (Post on Noticeboards)

- Protect. Keep interactions observable; avoid 1-to-1; no entry to dorms alone.
- Respect. No physical punishment, shaming, sexualised talk, or persuasive religious/political content.
- Boundaries. No personal gifts/cash; no private DMs; no photos without approval; no geo-tags.
- Report. If worried: ensure safety → tell CPO/Deputy immediately → file Incident Form within 2 hours.
- Media/AI. No face recognition, datasets, AI-generated or voice-cloned content using child images/audio.
- Visitors/Foreigners. Correct visa/FRRO; no foreign cash; donate via official channels only.

Appendix B — Safeguarding/Incident Report (Template)

1. Your name & role:
 2. Date/time & location of incident/concern:
 3. Child/ren involved (initials/ID):
 4. What happened / What you saw or were told (verbatim if disclosed):
 5. Immediate actions taken (safety/first aid/who informed):
 6. Names of any witnesses:
 7. Reported to (CPO/Deputy) & time:
 8. External referrals (Police/1098/CWC) & time:
 9. Follow-up plan / notes:
- Signature & date:

Appendix C — Media & Data Consent (Template)

Child's name/ID; Class/House; Guardian's name & contact

Purpose of media: (school publicity/reporting/partner feature)

Channels: (website, social, print) Duration: ___

What will be shared: (non-identifying images; no addresses/geo-tags)

Right to withdraw: Guardian may withdraw consent by contacting GSAM; future use will cease where practicable.

Guardian Signature/Date; GSAM Staff/Date

Appendix D — Visitor/Resident Quick Rules (Handout)

- Wear your badge and stay with your host.
- No photos without permission.
- Keep doors open; avoid one-to-one; no dorm entries alone.
- No gifts/cash to children/families; donate via office only.
- Correct visa required for NGO work; no foreign cash on campus; follow FRRO rules.
- Report any concern immediately to CPO/Deputies.

Appendix E — Short Definitions

Child: Anyone under 18 years.

Abuse: Physical, sexual, emotional, neglect, exploitation (including online).

Grooming: Building trust to enable abuse or exploitation.

Mandatory reporting (POCSO): Legal duty to report child sexual offences to police/1098 without delay.

Appendix F — Key Contacts (Post Internally)

CPO: Priscilla Shipway — 9557080756

Deputy CPO: Paula Karada — 8192955649

Deputy CPO: Rhoda Chand — 7895581191

Police: 112

Childline: 1098

Nearest Hospital/Ambulance: Prayas Hospital, Khatema, Udam Singh Nagar, Uttarakhand

Nearest Police Station: Banbasa, Dist. Champawat, Uttarakhand

CWC (Child Welfare Committee): CWC Office, Champawat, Uttarakhand