

ASSESSING CHILD PROTECTION MECHANISMS IN DELHI GOVERNMENT SCHOOLS

An analysis of CPC formation and functioning



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Abbreviations

CPC	Child Protection Committee
CPO	Child Protection Officer
CSSSP	Comprehensive School Safety and Security Programme
CWC	Child Welfare Committee
DCPCR	Delhi Commission for Protection of Child Rights
DCPU	Delhi Child Protection Unit
DoE	Department of Education
HOS	Head of School
IPC	Indian Penal Code
KBC	Kadam Badhate Chalo
MFF	Martha Farrell Foundation
NCRB	National Crime Records Bureau
NCERT	National Council of Educational Research and Training
PGT	Post Graduate Teacher
POCSO	Protection of Children from Sexual Offences
PTA	Parent Teacher Association
RTI	Right to Information
SMC	School Management Committee
SPO	Student Protection Officer
SSO	Student Safety Officer
TGT	Trained Graduate Teachers
UNICEF	United Nation Children's Fund

Introduction

Ensuring the safety and protection of children within educational institutions is a fundamental right, reinforced by various legal frameworks and judicial mandates in India. The Protection of Children from Sexual Offences (POCSO) Act, 2012, is one such legal framework, enacted to protect children from offences such as sexual assault, sexual harassment, and pornography. It mandates the establishment of Special Courts for the trial of such offences and related matters, ensuring that cases of sexual violence against children are handled with sensitivity and urgency. Recognising the rise in crimes against children, the Indian government introduced this law to ensure the protection of children across all spaces.

Before the enactment of the POCSO Act, cases involving children were tried under various sections of the Indian Penal Code (IPC), which lacked clarity and child-sensitive provisions. However, the POCSO Act specifically deals with sexual offences committed against children, and includes child-sensitive provisions. The landmark 2007 [National Study on Child Abuse](#), conducted by the Ministry of Women and Child Development, with support from UNICEF, Save the Children, and Prayas, surveyed 12,447 children across 13 states and found that 53.22% of children reported experiencing some form of sexual abuse. Half of these cases involved persons known to the child, highlighting the need for legal provisions prioritising child protection. The Act takes a gender-neutral approach to child sexual abuse, prescribes strict punishments, and mandates child-friendly procedures for reporting, recording evidence, and conducting trials, to ensure that survivors receive justice without further trauma, and that the right to privacy and confidentiality of a child is protected throughout the procedure.

The urgency of implementing the POCSO Act is highlighted by the data from the National Crime Records Bureau ([NCRB](#)). In 2022 alone, over 63,414 cases were registered under the Act, accounting for nearly 40% of all crimes against children in India. States like Maharashtra, Uttar Pradesh, and Madhya Pradesh reported the highest number of cases, while Delhi recorded over 1,512 cases, making it one of the highest among metropolitan areas. Such statistics emphasise the need for stronger enforcement of child protection laws and proactive interventions within schools and communities.

Apart from criminalising various forms of sexual abuse, the POCSO Act also emphasises preventive measures. Section 43 of the Act mandates awareness and sensitisation programmes in public spaces through media and training to inform the general public, children, as well as their parents and guardians, about the provisions of the Act.

Additionally, Section 3(5) of the POCSO Rules, 2020, directs all institutions, organisations, or any other agency working or coming in contact with children to adopt a Child Protection Policy based on the principle of zero tolerance for violence against children. Despite the existence of these guidelines, their implementation remains inconsistent. A 2024 article from the [Education Times](#) highlights the challenges schools face in enforcing safety guidelines, emphasising the need for greater accountability from school administrations and government authorities.

The Supreme Court has reinforced the mandate for child safety through various judgments. In [Avinash Mehrotra v. Union of India](#), the Court interpreted the right to education to include a safe school environment, holding schools accountable for adhering to safety protocols. More recently, the Supreme Court [mandated](#) all States and Union Territories to implement the "[Guidelines on School Safety and Security, 2021](#)" issued by the Union Government, further reinforcing the responsibility of schools to safeguard children from threats such as natural disasters, health hazards, abuse, violence, and accidents.

Organisations like [UNICEF](#) have contributed significantly to strengthening school safety measures. In West Bengal, UNICEF collaborated with state authorities to develop the Comprehensive School Safety and Security Programme (CSSSP), which focuses on secure learning environments, disaster risk reduction, and child protection to prevent violence and abuse. Similarly, in Chhattisgarh, a [situational analysis](#) conducted by UNICEF highlighted the need to evaluate current school conditions concerning safety and security, aligning with its global guidelines.

To create an understanding among all stakeholders, including students and parents, on the need for co-creating a safe and secure school environment for the holistic development of children, the [Department of Education \(DoE\) passed a guideline in 2021](#), stating that schools must form a School Safety Committee to ensure a safe and violence-free environment. The committee should include:

- **Chairperson:** Head of the institution (Principal/Headmaster) as the key nodal person.
- **Student Safety Officer (SSO) or Child Protection Officer (CPO):** A permanent employee (teaching/non-teaching), if possible with at least 5 years' service in the school and a background in child psychology, counselling, or child protection.
- **Faculty Representatives:** Two or more members, including at least one woman, from teaching or non-teaching staff, covering primary, middle, and senior levels.
- **Parent Representatives:** Two parents, one of whom should be part of the School Management Committee (SMC) or Parent Teachers Association (PTA). Membership rotates annually, with any term not exceeding more than one year.
- **Student Representatives:** Two senior students, ideally one girl and one boy.
- **Alumni Representatives (optional):** One or two active alumni members, passionate about school development, and can devote time.

This committee also includes an **Anti-Bullying Task Force** comprising student leaders who act as peer counsellors to foster a positive school environment.

According to Rule 3(5) of the POCSO Rules, 2020, “The respective governments shall formulate a Child Protection Policy based on the principle of zero tolerance for violence against children. This policy shall be adopted by all institutions, organisations, or any other agencies working with, or coming in contact interacting with, children.” In line with this, in 2023, the Delhi Commission for Protection of Child Rights ([DCPCR](#)) issued draft guidelines on child protection, with a Standard Operating Procedure (SOP) for reporting, inquiry, and action (Chapter VI). This SOP mandates that every institution must “constitute or designate a Child Protection Committee, led by the Head of the Institution.”

These committees are expected to play a crucial role in fostering a secure educational environment, but their effectiveness depends on their proper formation and active functioning.

As can be noted, in Delhi, schools and other institutions have two sets of rules to follow - mandates by the DoE, and the draft guidelines by the DCPCR. Thus, despite the presence of robust policies and legal mandates, there is often confusion in school administrations to create effective child protection mechanisms. Further, challenges remain in their implementation, raising concerns about accessibility, transparency, and adherence to child safety regulations in schools.



¹ District Child Protection Unit (DCPU) means a Child Protection Unit for a District, established by the State Government under Section 106 of the Juvenile Justice Act, 2015, which is the focal point to ensure the implementation of this Act and other child protection measures in the district. Block and village-level CPCs also come under DCPU.

The study

As part of MFF's research and advocacy efforts, we have leveraged the Right to Information (RTI) Act, 2005 to assess the status of Child Protection Committees (CPCs) in government schools across Delhi and evaluate the actions taken by school administrations in ensuring a safe environment for children under the Protection of Children from Sexual Offences (POCSO) Act, 2012.

To gain insights into the formation and functioning of CPCs, MFF filed an RTI application with the DCPCR on 30 October, 2024. The RTI sought specific details from each government school on the CPCs established, including the names, designations, and contact details of committee members.

As per RTI Act regulations, the concerned authorities were expected to respond within one month of filing.

Composition and responsibilities of CPCs

The draft guidelines set by the DCPCR state that schools and other institutions which come in contact with children in Delhi must constitute a CPC. The committee must include:

- **Head of the institution** (Chairperson).
- **At least one parent or guardian** of the children that the institution caters to (for Child Care Institutions, this is a representative from the District Child Protection Unit¹).
- **One external member with experience in child rights issues**, appointed by the Deputy Director of Education (for schools), the Child Welfare Committee (for Child Care Institutions), or the Supervisor (for Anganwadi Centres).
- **At least one female member**, unless the institution exclusively serves male children and staff.
- **Child representatives**, except in primary schools and Anganwadi Centres, whose role is limited to sensitisation and awareness activities. They must not be a part of the enquiry committees related to complaints conducted by CPC.

Responses from the RTI application sought to assess whether CPCs have been constituted, and if so, whether they are in accordance with the composition in the draft guidelines.

Findings

Responses to RTI applications

MFF's RTI application, submitted to DCPCR, was forwarded to the Directorate of Education and then directed to the respective zonal offices. Out of 1,379 government schools, responses were received from 338 schools across 11 districts and 29 zones in Delhi (Figures 1 and 2).

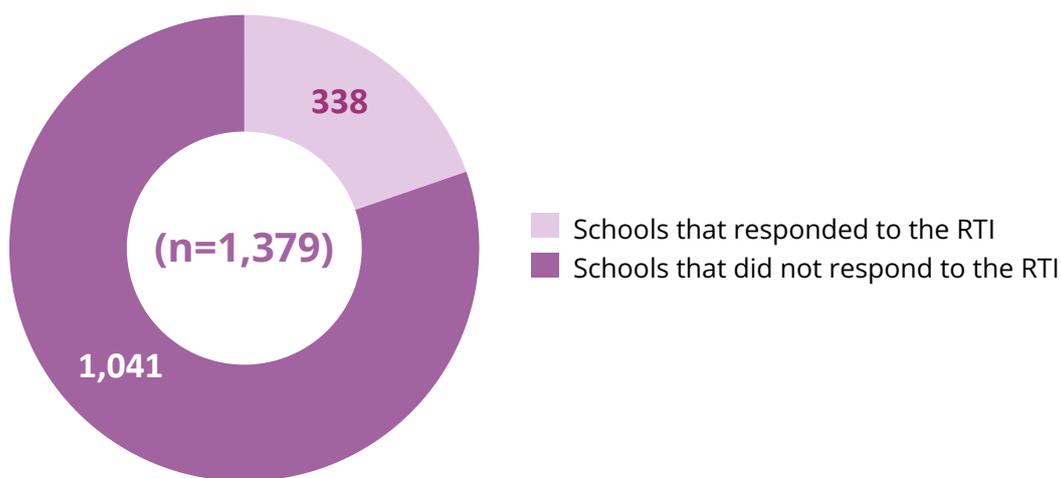
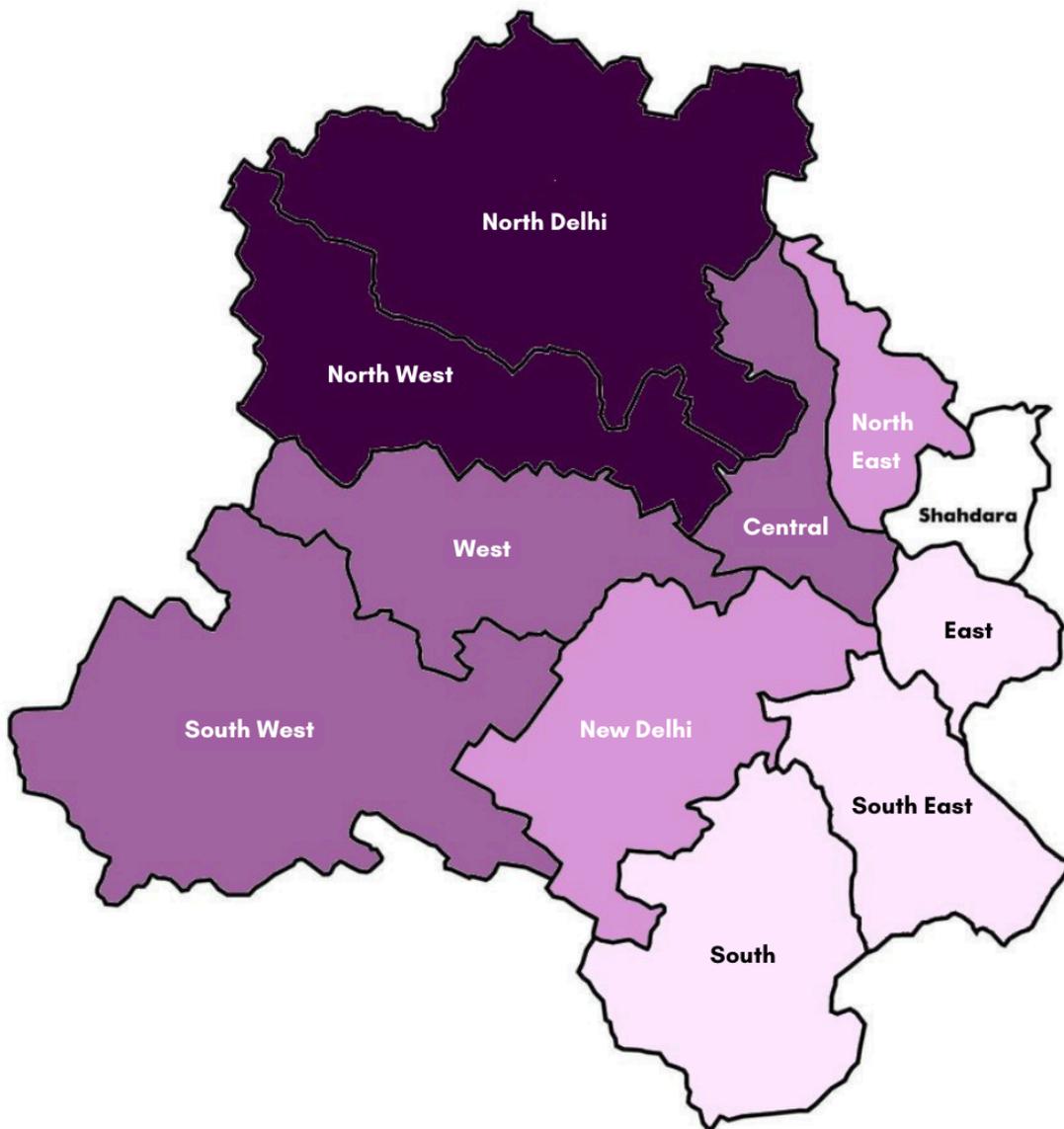


Figure 1: Number of schools that responded to the RTI



District/ subdivision	Zone	Number of schools	Number of responses received
East	1, 2, and 3	138	1
North-East	4, 5, and 6	234	43
North	7 and 8	35	19
North-West A	9 and 10	107	62
North-West B-1	11	56	20
North-West B	12	40	40
North-West B-II	13	98	37
West A	14, 15, and 16	61	20
West B	17 and 18	187	33
South-West A	19 and 20	54	2
South-West B	21 and 22	177	49
South	23 and 24	69	2
South-East	25	32	1
New Delhi	26	14	2
Central Delhi	27 and 28	29	6
South-East	29	48	1
Total		1,379	338

Table 1: List of District and Zone-wise government schools in Delhi



- District where no school responded to the RTI application
- Districts less than 10% schools responded to the RTI application
- Districts where 10-20% schools responded to the RTI application
- Districts where 20-30% schools responded to the RTI application
- Districts where more than 50% schools responded to the RTI application

Figure 2: District-wise RTI responses received

Data analysis

Out of a total of 1,379 schools, 338 schools responded to the RTI, while the remaining schools either failed to provide information or had not maintained relevant data. The limited number of responses to the RTI, along with the information provided by those who did respond, reveal significant gaps in both compliance and data transparency regarding the formation and operation of CPCs in schools.

Table 2 provides a summary of the responses received to the RTI application.

Category	Number of Schools/Zones
Schools that have constituted a Child Protection Committee and provided details of the committee	199
Schools that have constituted a Child Protection Committee, but not provided details of the committee	127
Schools that have not constituted a Child Protection Committee	6
Schools that have not maintained information	6

Table 2: Summary of responses received from the RTI application

From the 338 schools that did respond to the RTI, 199 schools confirmed that they had constituted a Child Protection Committee and also provided complete details about its composition and functioning (Figure 3). The majority of these schools appeared to follow the structure outlined in the DoE guidelines. In most cases, the Principal or the Head of the School (HoS) was designated as the chairperson, supported by male and female teachers, including Post Graduate Teachers (PGT) and Trained Graduate Teachers (TGT), along with members of the School Management Committee (SMC). While this suggests general compliance with committee formation requirements, further analysis revealed key gaps in implementation.

Among the responses, 127 schools confirmed that they had formed CPCs, but did not provide any details about their composition. Of these, 57 schools from two districts (North and North-West) stated that their CPCs were constituted as per the Department of Education (DoE) guidelines, but refused to share further information. The remaining 70 schools claimed that CPC details were maintained in school records and could only be accessed through an in-person visit with prior permission from higher authorities. This lack of disclosure raises concerns about the authenticity and transparency of these committees. The absence of detailed information limits the ability to assess whether these CPCs are functional or merely exist on paper to fulfill administrative requirements.

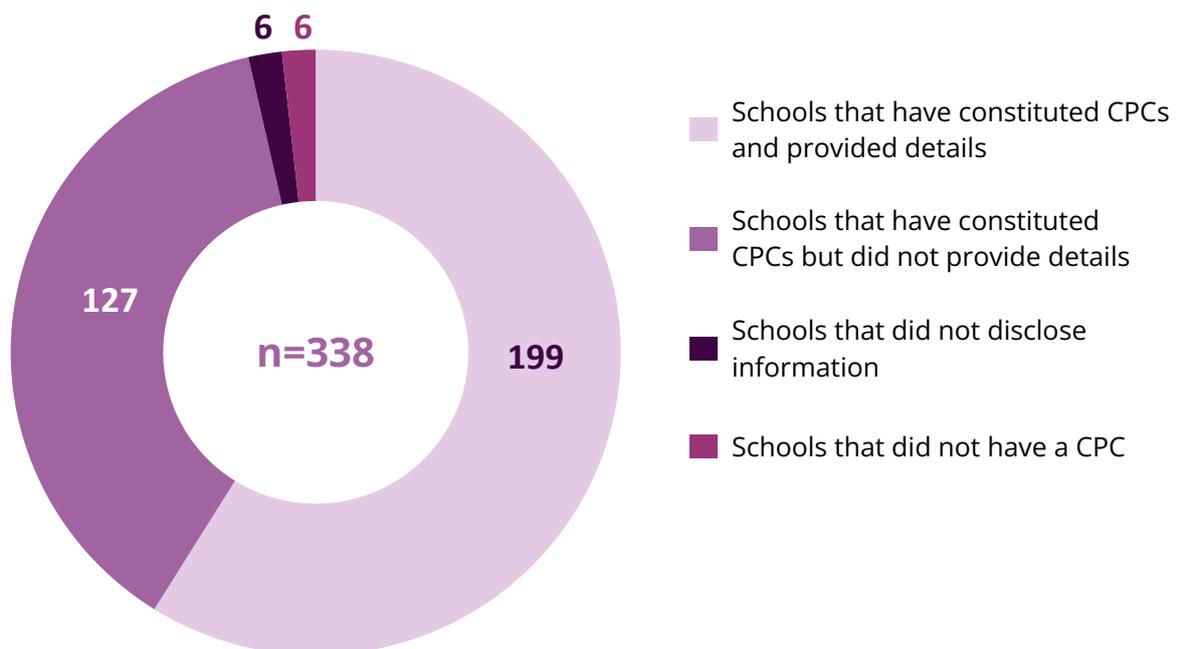


Figure 3: Number of schools that provided information on the status of CPCs

Worryingly, **six** schools outrightly stated that they had not constituted a CPC, which is a violation of the guidelines issued by child protection authorities such as the DCPCR and the DoE. The lack of a CPC compromises the safety of students, as these committees are mandated to be the first line of response for any child protection concern within the school. Additionally, three schools did not disclose any information in response to the RTI. This non-disclosure indicates a lack of transparency, and raises questions about the accountability mechanisms in place at the zonal or school level.

Looking at the data zone-wise, 11 zones provided information on their CPCs (Figure 4). 12 zones admitted that they had not maintained or compiled records regarding the CPCs, pointing to weak institutional record-keeping and a potential disregard for child protection policies. Further, it reflects a systemic failure in administrative oversight and data management. If data about such a critical institutional mechanism is not centrally compiled or tracked, it becomes difficult to monitor implementation, ensure accountability, or initiate improvements.

Two zones (Zone 4 and Zone 18) refused to share information unless postal charges were paid. Such demands for payment create unnecessary barriers to public access to information and undermine the spirit of the RTI Act, which is meant to promote transparency and public accountability, especially in matters concerning children's safety.

Four zones (Zone 2, Zone 3, Zone 7 and Zone 23) did not respond to the RTI.

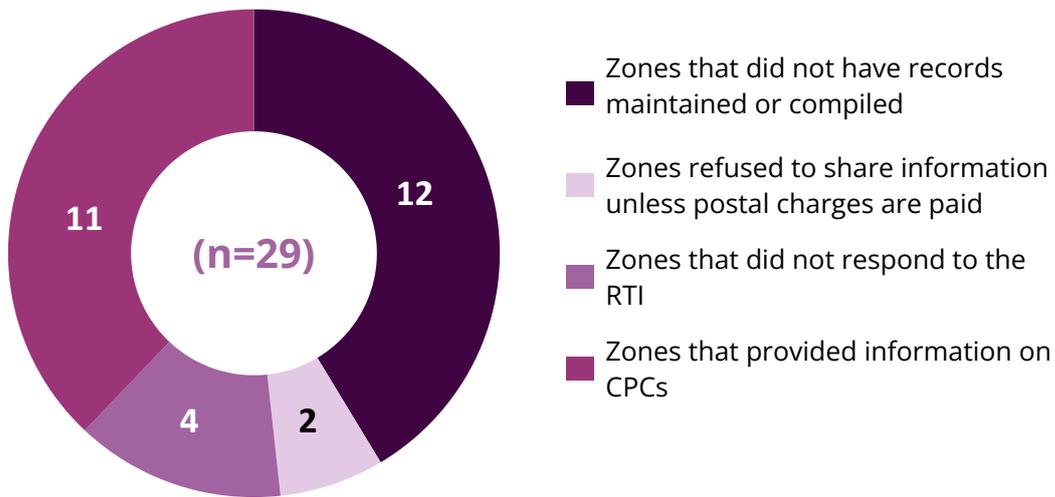


Figure 4: Zone-wise segregation of data received

Uneven constitution and implementation of CPCs in Delhi schools

Out of 199 schools that provided details of the CPC members, only 30 schools across five districts – North, North-East, North-West, West, and South-West – had designated a Student Safety Officer (SSO) or Child Protection Officer (CPO) with a background in social work or counselling (Figure 5).

This role is important, as trained professionals bring the necessary expertise to identify, respond to, and intervene in child protection concerns in a timely and sensitive manner. Their presence can significantly strengthen the ability of a school to prevent, detect, and respond to abuse, neglect, or violence affecting children.

The fact that a majority of schools have not appointed such professionals highlights a critical gap in implementing child protection mechanisms effectively at the school level. Without trained SSOs or CPOs, many Child Protection Committees (CPCs) are likely operating without the essential knowledge and skills required to ensure student safety and well-being.

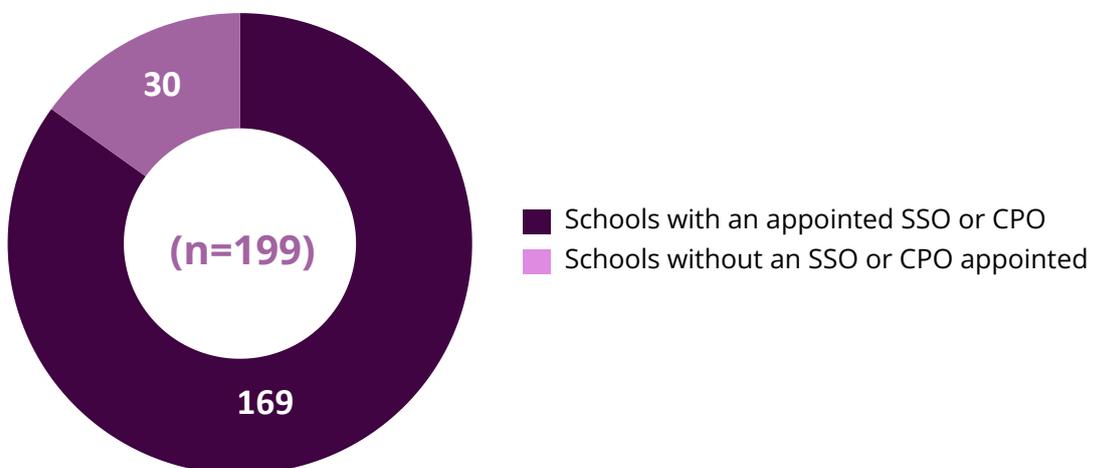


Figure 5: Number of schools appointed SSO or CPO

Additionally, only six schools from two districts – West and North-West – reported the inclusion of student representatives in their CPCs (Figure 6). This is despite clear recommendations in the DCPCR draft guidelines and the DoE advisory, both of which stress the importance of student participation in safety-related decision-making.

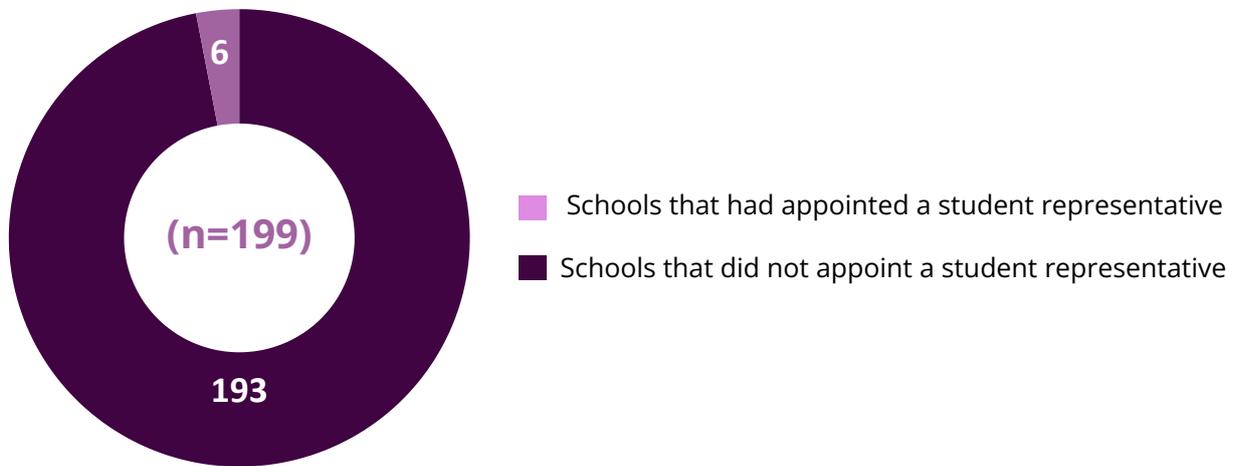


Figure 6: Number of schools with an appointed student representative in their CPCs

Including students not only aligns with child rights-based approaches, but also fosters a sense of agency and accountability among young people. Their lived experiences and perspectives are vital in shaping relevant, responsive, and inclusive safety measures. The widespread exclusion of students from these committees suggests a missed opportunity to institutionalise participatory mechanisms and nurture a culture of safety, trust, and dialogue within schools.

These findings highlight a mixed picture of responses, while some schools are aligned with policy mandates and show a commitment to child safety, a significant number demonstrate poor compliance, lack of transparency, and inadequate prioritisation of child protection mechanisms. And also reflects upon the urgent need to reinforce adherence to existing child protection guidelines and policies. The effective implementation of these measures, particularly the appointment of trained professionals and inclusion of students, can create safer and more supportive school environments where children’s rights are upheld and their voices are valued.

Conclusion

More than a decade has passed since the enactment of the POCSO Act in 2012, yet its implementation at the state-level remains inadequate. The Delhi government drafted child protection guidelines in 2023, but they are yet to be finalised and enforced. This delay highlights the state's failure to institutionalise child safety measures in educational spaces. Despite legal mandates, neither the state government nor school administrations have taken concrete steps to ensure safe learning spaces for children. The failure to integrate the POCSO Act in school governance reflects a systemic gap in prioritising child protection.

The responses of the RTI from 11 districts and 29 zones of Delhi reveal the ongoing challenges in the formation and functioning of Child Protection Committees (CPCs) in government schools. While many schools have constituted CPCs, transparency in their composition remains a major concern. Several schools failed to disclose details about their committees, and some restricted access to such information, raising serious questions about accountability and oversight. The lack of publicly available data weakens the ability of stakeholders to assess whether these committees are effectively ensuring child safety.

The [NCERT guidelines](#) for forming School Management Committees (SMCs) in government schools is an important step in making schools more accountable towards ensuring a safe educational space for all children. These committees give parents, teachers and community members a say in how the school should run, including in matters of safety and child protection. Strengthening SMCs is important as it helps ensure that schools take responsibility for creating a secure and supportive environment for all children.

While most schools follow the basic structure outlined in the DoE guidelines, significant shortcomings continue to persist. The absence of designated Student Safety Officers (SSOs) or Child Protection Officers (CPOs) with expertise in counselling and child protection is alarming, as it hampers schools' ability to address child safety concerns effectively. Furthermore, the lack of student representation in CPCs limits opportunities for participatory approaches that provide a space for children to advocate and have a say in ensuring their safety and well-being.

For CPCs to work effectively, schools must do more than just setting up the CPCs. They need to make sure these committees are active, well-trained, and fully aware of child protection mechanisms under the POCSO Act. CPCs should also include trained professionals and involve students in monthly meetings to ensure their voices are heard.

It is also important for schools to share clear information about CPCs in the form of a banner including the information of the committee or install a complaint box so that students and staff know who to reach out to for help. Additionally, robust monitoring and evaluation mechanisms must be in place to hold CPCs accountable and ensure compliance with child protection policies.

Strengthening these committees and fully enforcing the POCSO Act is essential to creating a safe and supportive learning environment where children can study without fear. Schools and other institutions working with children should also adopt the principle of zero tolerance for violence against children, as suggested by the law.



About the Martha Farrell Foundation

Established in 2016, the Martha Farrell Foundation (MFF) carries forward Dr. Martha Farrell's legacy with a vision for a world where all formal and informal learning and working spaces are safe and gender equitable. MFF's mission is to ensure that all individuals feel secure and valued in their working and learning environments through:

- Education: Co-designing learning programs to inform, raise awareness, and empower individuals and institutions on issues of safety and gender equity.
- Research: Generating knowledge on gender equity and preventing gender-based violence in both learning and working environments.
- Advocacy: Influencing stakeholders to design and implement effective policies, institutional practices, and laws.

Kadam Badhate Chalo, MFF's flagship programme is premised on the understanding that young people around the world have enormous potential to become leaders of change. The programme is a unique collaboration between adolescents, the community, civil society, and administrative systems to enable collective action against sexual and gender-based violence.

Co-designed and co-implemented with adolescent leaders, the program supports adolescents to undertake a journey of discovering their inner potential, learning skills, knowledge and developing their individual and collective voice and agency, to take collective action to counter sexual and gender-based violence in their lives.

Under this programme, MFF has worked to ensure that learning spaces are safe and inclusive by strengthening the implementation of the POCSO Act. Through capacity-building workshops, training modules, and gender-sensitisation programmes, MFF equips students, educators, and school authorities with the knowledge and tools necessary to create a safe learning environment.

By collaborating with schools to establish and strengthen CPCs, the Foundation highlights a culture of openness, sensitivity, and accountability. Its advocacy efforts empower students to voice their concerns and transform schools into spaces where every child can learn and thrive without fear of violence or discrimination.



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