



**School safety**  
**Need for a new due diligence approach**

January 2018

## Introduction



In the last decade India has seen tremendous growth of private and public educational institutes to cater to new career aspirations that students and parents harbor. To illustrate, between 2010-11 and 2015-16, the number of private schools in India, affiliated to the major Boards of Education (National and International) grew by 35% while the number of government schools grew by 1%<sup>1</sup>. This growth, fueled by Government sponsored initiatives such as the Sarva

Shiksha Abhayan, Midday Meal and introduction of e-learning initiatives<sup>2</sup> has cascaded to increased employment opportunities for teachers, support staff and ancillary staff employed at schools.

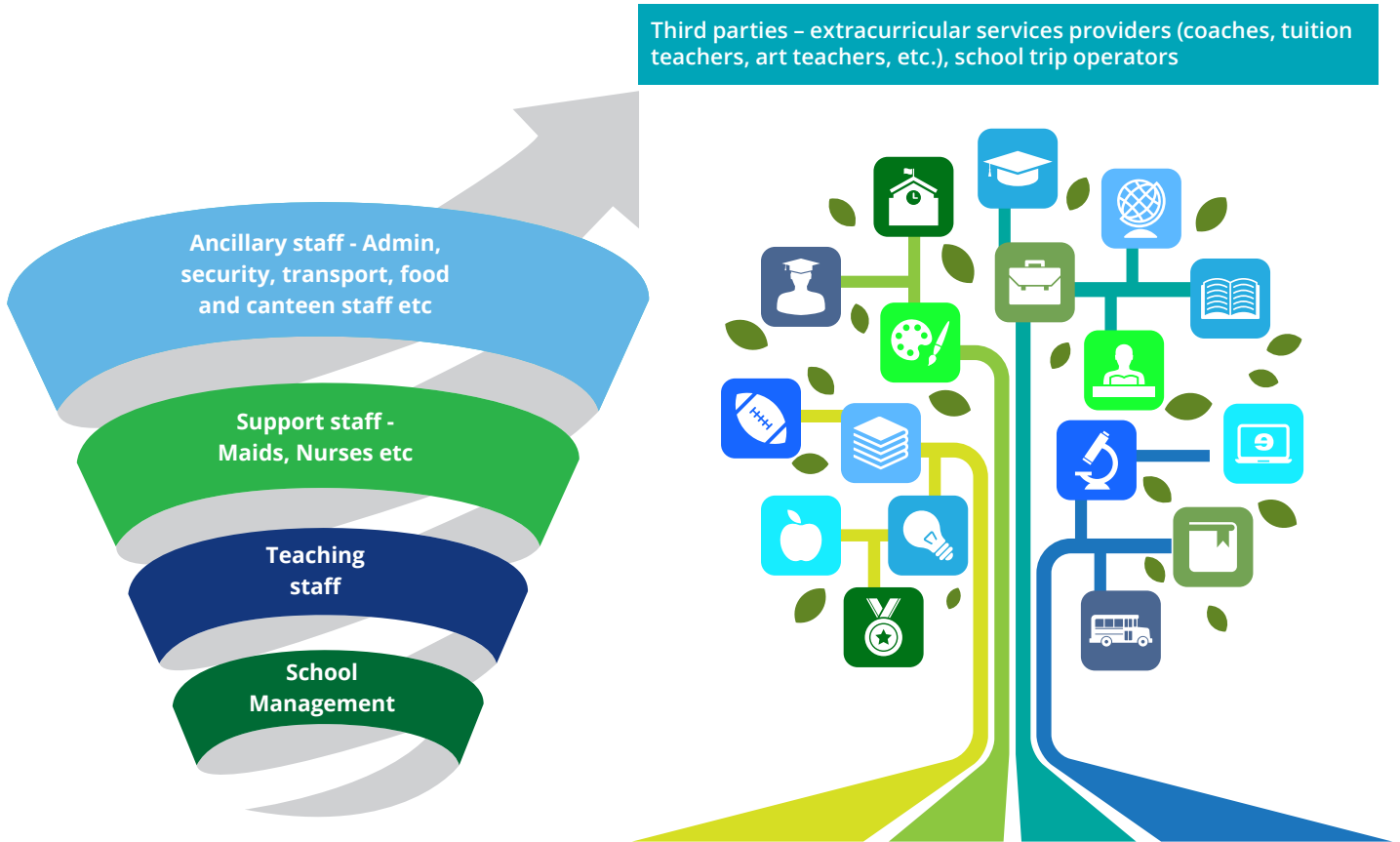
However, recent incidents of physical abuse at school involving young school children indicate that students' safety needs to be addressed on an immediate basis. Recognizing this, in September 2017, the Central Board of Secondary Education (CBSE) released a circular

mandating schools to reimagine their safety measures. Among other recommendations, the circular also highlighted the need for adequate background verification of staff employed at schools. In our view, this is one of the most important aspects for schools to consider, as young children tend to inherently trust those they engage with. It is a violation of this trust that can result in abuse and harm to the child.

<sup>1</sup> Source: A [research paper](#) titled "The Private Schooling Phenomenon in India: A review," authored by Geeta Gandhi Kingdon, University College London and Institute of Labor Economics, published in March 2017. The paper itself derives its findings from the government of India's District Information System on Education (DISE) and the [Annual Status of Education Report](#), published by NGO Pratham.

<sup>2</sup> Source: Article in HT Mint that states revised budgets (9.9% growth) allocated towards the education sector's growth as part of the 2017-18 Union Budget announcement <http://www.livemint.com/Politics/hkjZw2CFY9u4xGHDk6QftN/Union-budget-2017-Education-outlay-increases-99-to-Rs796.html>

## The growing school ecosystem



## Schools' perspective on safety

Preliminary research into the safety initiatives that have been taken by Indian schools, particularly in the private sector, indicate investments in two areas:

- Conducting sexual education classes, particularly with a focus on identifying potential abuse, through the 'good touch versus bad touch' approach. While some schools conduct this through staff, most employ psychologists, child health professionals and NGOs to conduct these sessions.
- Enhancing physical safety in the form of adding CCTV cameras to the premises, GPS trackers in school buses, restricting access to certain areas in the absence of RFID enabled access cards, and employing third party security agencies to man the perimeters of the school campus.



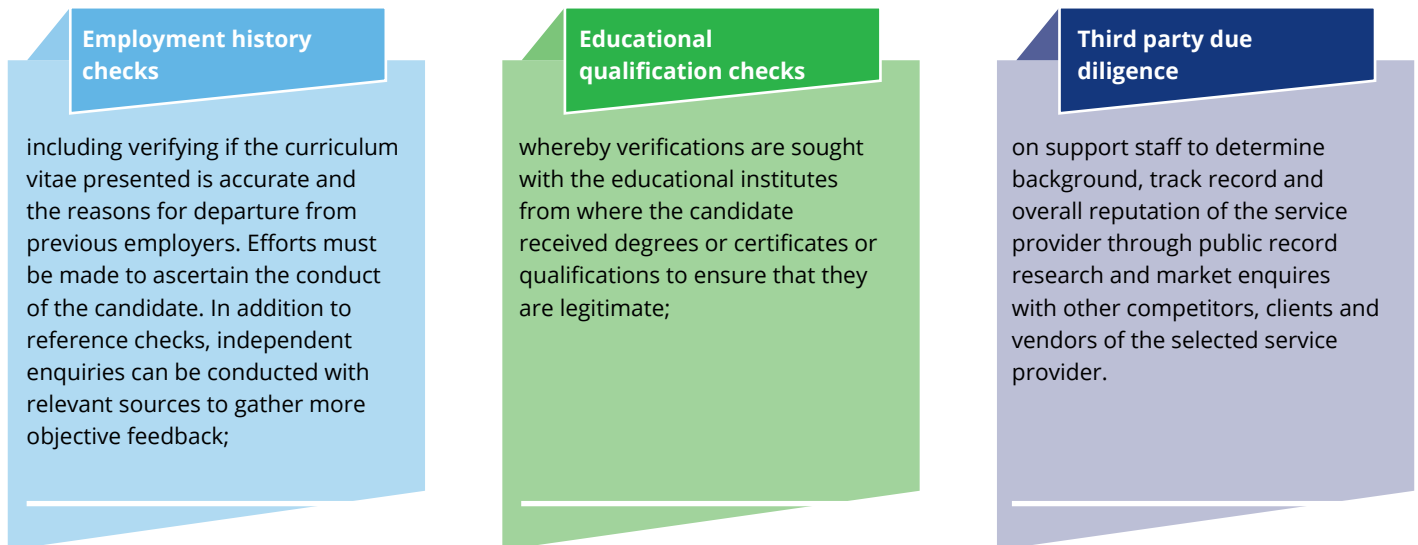
In our experience, these measures are helpful, but on their own may not be adequate to safeguard children in absence of a strict due diligence criteria for recruitment of individuals who will carry out these duties. For instance, students can be subjected to abuse inside the school bus if staff can manipulate the CCTV

cameras and GPS trackers. It has been indicated in media reports that many schools fail to conduct mandatory police verification of prospective employees prior to hiring them<sup>3</sup>. It has also been noted that individuals with a criminal history have been employed by schools – both government and private schools.

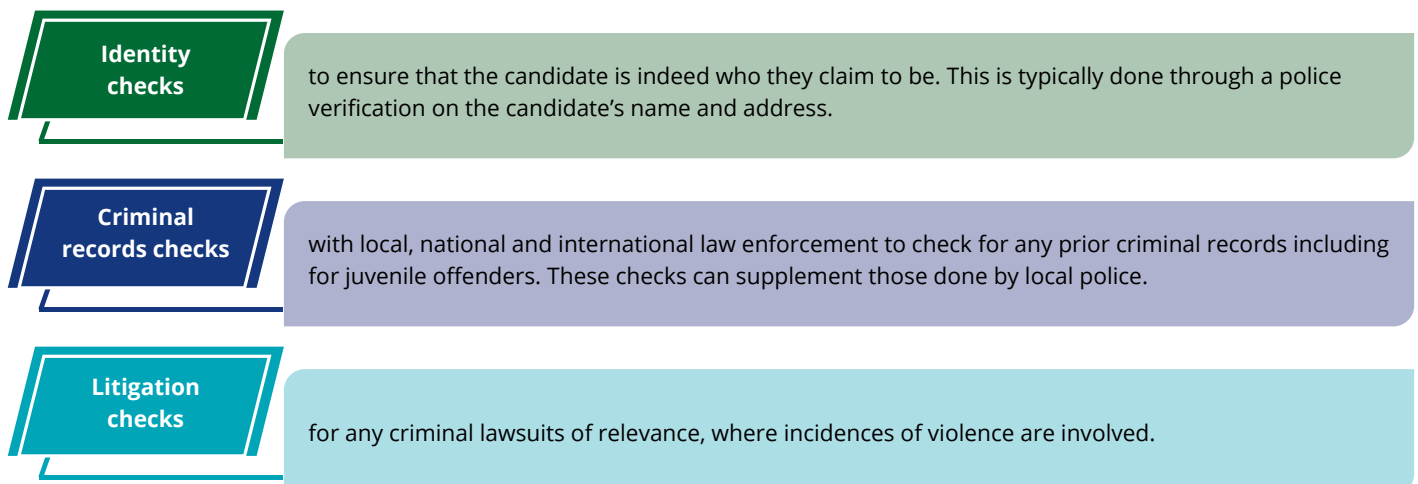
<sup>3</sup> Source: Article published in [The Quint](#) dated 12 September 2017

## A new due diligence approach

Given the complexities involved in undertaking background research on individuals, most schools may tend to outsource this procedure to an external agency. However, a recent study conducted found that 1 out of every 10 candidates misrepresent some form of information including, education, employment, identity etc.<sup>4</sup> Therefore, schools need to ensure that the agencies they hire are capable of identifying such misrepresentations and highlighting them to the school management. Ideally, the school can undertake background checks to authenticate information along the following parameters:



These enhanced checks should ideally supplement the basic background checks which are either conducted by due diligence agencies or local enforcement and which include:



The background checks should be a more comprehensive due diligence effort where a combination of targeted public record research is supplemented by human source enquiries with those who have knowledge of and access to the candidates. These could include former colleagues, superiors, classmates, teachers, students or then clients, vendors, competitors among others.

The importance of conducting enquiries in India where records are not digitized or information is not easily found online could be invaluable towards either proactively identifying potential miscreants or conversely assuring parents (and the public at large) that appropriate and adequate measures are being taken by the school to mitigate such risks.

<sup>4</sup> Source: Article published in [The Quint](#) dated 12 September 2017

## Conclusion



In many developed countries there are centralized databases that are publicly available for validation of candidates seeking employment in schools. These include sex offender registries with geolocations maintained by the government, teacher status checks relating to educational qualifications and employment history maintained by education boards, and criminal record check reports maintained by local government agencies.

In contrast, in India police verification for employment is mandatory only in some states. India also does not have a sex offender's registry in place yet. However,

as schools invest in a streamlined process of conducting background searches, we foresee the government setting up databases with digital records that are easy to validate. Recently, the Karnataka state government issued a circular to schools mandating that they register their staff with local police stations. Delhi's deputy chief minister announced in September 2017 that mass police verification of school staff would take place and a list of known child abuse offenders would be shared with schools. The CBSE has also mandated that police verification and psychometric tests be conducted on teaching and non-teaching staff that deal with children.

Should these databases and accreditations become functional in the near future, the onus of getting their credentials validated can be shifted to aspiring teaching and non-teaching staff hoping to work with children – not just in schools but also hospitals, NGOs, children's theme parks etc. to provide information, references and qualifications which can then be verified. Employers can then recruit from such central databases with a degree of assurance that the candidate has been verified on the lines of acceptable parameters and that the degree of background checks conducted are commensurate across institutions.

# Acknowledgement

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