



INTERNATIONAL LAW
JOURNAL

**WHITE BLACK
LEGAL LAW
JOURNAL
ISSN: 2581-
8503**

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

WWW.WHITEBLACKLEGAL.CO.IN

DISCLAIMER

No part of this publication may be reproduced, stored, transmitted, translated, or distributed in any form or by any means—whether electronic, mechanical, photocopying, recording, scanning, or otherwise—without the prior written permission of the Editor-in-Chief of *White Black Legal – The Law Journal*.

All copyrights in the articles published in this journal vest with *White Black Legal – The Law Journal*, unless otherwise expressly stated. Authors are solely responsible for the originality, authenticity, accuracy, and legality of the content submitted and published.

The views, opinions, interpretations, and conclusions expressed in the articles are exclusively those of the respective authors. They do not represent or reflect the views of the Editorial Board, Editors, Reviewers, Advisors, Publisher, or Management of *White Black Legal*.

While reasonable efforts are made to ensure academic quality and accuracy through editorial and peer-review processes, *White Black Legal* makes no representations or warranties, express or implied, regarding the completeness, accuracy, reliability, or suitability of the content published. The journal shall not be liable for any errors, omissions, inaccuracies, or consequences arising from the use, interpretation, or reliance upon the information contained in this publication.

The content published in this journal is intended solely for academic and informational purposes and shall not be construed as legal advice, professional advice, or legal opinion. *White Black Legal* expressly disclaims all liability for any loss, damage, claim, or legal consequence arising directly or indirectly from the use of any material published herein.

ABOUT WHITE BLACK LEGAL

White Black Legal – The Law Journal is an open-access, peer-reviewed, and refereed legal journal established to provide a scholarly platform for the examination and discussion of contemporary legal issues. The journal is dedicated to encouraging rigorous legal research, critical analysis, and informed academic discourse across diverse fields of law.

The journal invites contributions from law students, researchers, academicians, legal practitioners, and policy scholars. By facilitating engagement between emerging scholars and experienced legal professionals, *White Black Legal* seeks to bridge theoretical legal research with practical, institutional, and societal perspectives.

In a rapidly evolving social, economic, and technological environment, the journal endeavours to examine the changing role of law and its impact on governance, justice systems, and society. *White Black Legal* remains committed to academic integrity, ethical research practices, and the dissemination of accessible legal scholarship to a global readership.

AIM & SCOPE

The aim of *White Black Legal – The Law Journal* is to promote excellence in legal research and to provide a credible academic forum for the analysis, discussion, and advancement of contemporary legal issues. The journal encourages original, analytical, and well-researched contributions that add substantive value to legal scholarship.

The journal publishes scholarly works examining doctrinal, theoretical, empirical, and interdisciplinary perspectives of law. Submissions are welcomed from academicians, legal professionals, researchers, scholars, and students who demonstrate intellectual rigour, analytical clarity, and relevance to current legal and policy developments.

The scope of the journal includes, but is not limited to:

- Constitutional and Administrative Law
- Criminal Law and Criminal Justice
- Corporate, Commercial, and Business Laws
- Intellectual Property and Technology Law
- International Law and Human Rights
- Environmental and Sustainable Development Law
- Cyber Law, Artificial Intelligence, and Emerging Technologies
- Family Law, Labour Law, and Social Justice Studies

The journal accepts original research articles, case comments, legislative and policy analyses, book reviews, and interdisciplinary studies addressing legal issues at national and international levels. All submissions are subject to a rigorous double-blind peer-review process to ensure academic quality, originality, and relevance.

Through its publications, *White Black Legal – The Law Journal* seeks to foster critical legal thinking and contribute to the development of law as an instrument of justice, governance, and social progress, while expressly disclaiming responsibility for the application or misuse of published content.

INSTITUTIONALIZATION OF VULGARITY: THE SQUALID SHIELD OF ADMINISTRATIVE COMPLICITY IN SCHOOL OBSCENITY

AUTHORED BY - SHAKTI GAYATRI PANDA

Advocate

Patna High Court, Patna. BIHAR

ABSTRACT

There is a famous quote “You don’t need missiles to destroy a nation. Just ruin its education system”.

This quote underlines the importance of Educational institutions in building or destroying a nation. Because classroom/school is the breeding ground or cradle, where young minds are nourished and future citizens are manufactured. The lessons learnt in young age has a life long impact upon the individual, consequently shaped the character of an individual. It is pertinent to mention that teachers are shouldered with highly pious responsibility of raising decent, educate, gentle, highly moral students/citizens. The teachers are the architect of nation because they are shaping the character, morality, individuality. A teacher is a pivotal person to transform a pupil into a great citizen or a smudge offender. The fate of a nation is built inside the precinct of school. That's why schools are called temple of education. But, when these schools started to institutionalize obscenity and impart the lore of vulgarity, obscenity, sexually suggestive, highly immoral perceptions, then the trust of the society completely distorted and collapsed.

This article is based on *first hand experience and battle of the author against vulgarity inside school in front of minor students*. The case is a true one, exposing the perverted bureaucratic shield and collapse of educational administration at a Centrally Sponsored PM SHRI School situated at a remote rural area of Odisha.

The Author is a legal practitioner, an RTI Activist as well as socio-legal author, is the complainant of a case of vulgar dance performances organized by the Headmaster of a PM SHRI School in the Block- Rajkanika, Dist - Kendrapara, Odisha.

The article revolves around the persistent struggle of the author for protection of child rights and a despicable administrative as well as bureaucratic apathy; a tussle between rule of law and a morally compromised administration that, rather than upholding academic integrity, has weaponized institutional power to patronize vulgarity within school walls.

Keywords- School, vulgarity, obscenity, childrights, education, Article 21 A

1. INTRODUCTION

This case is an example of a highly harrowing testament to how the apex custodian of an educational institution - the headmaster can utterly betray the sacred trust reposed to him by society and desecrate the structural sanctity of a school.

A school is traditionally revered as a sanctuary for moral and intellectual elevation; however by actively fostering and normalizing systematic obscenity within the school campus, the head of the institution and school administration reduced this shrine of learning to a breeding ground for cultural and moral degradation.

Headmaster of a school is termed as a *loco parentis*. *Loco parentis* is a Latin legal term meaning 'in place of a parent'. It refers to the legal doctrine that have bestowed the responsibility to headmaster to supervise, discipline students, ensuring their safety and well being while they are inside school premises.

This is not merely a breach of professional duty; it is a profound societal betrayal that compromises the psychological well-being of innocent children.

2. Brief fact of the case

The brief fact of case story is that on the occasion of golden jubilee, the headmaster organized a vulgar, sexually suggestive, eve-teasing oriented adult dance program inside the school premises in front of the minor school going children. The School invited many dignitaries including District Magistrate, District Education Officer, local politicians as well as Minister of the State.

During cultural programme, a professional orchestra troupe was invited to the school campus

equipped with adult performers. The performer initiated the program by acknowledging gratitude to the teachers of the school by addressing "*Guruji guruma nku nka mancha uparu bhumistha pranam*". The height of audacity was that he did not hesitate to announce, that night the troupe would with others will perform the rowdy, indecent songs and the children will dance in tune with them. When these indecency was going on, the headmaster and teachers become the perpetrators in transformation of innocent minor students to future indecent citizen.

Music performed included "*chumma re*", "*tor kathar mo manke gala heart touch kala, tate dekhi chadhigala garam, rang mera kala, tera bhai bana mera sala, ae champa kahlo champa habu kilo mora na, nahale tu maralo, jahar pee debilo.*" All these songs are uncivilized, eve-teasing songs. *chumma* (kiss) word is inappropriate in front of minor students.

The shamelessness of headmaster and school administration knew no bounds. Such vulgarity continued for multiple nights. The performers wore a body revealing transparent black slacks with bust attracting lingerie with a short. And the school alumnus, students, performers fearlessly post the videos openly in social media citing it as a big achievement of such performances in Golden Jubilee function. The performers expressed sexually suggestive and headmaster exposed the children to highly denigrating environment.

Whole night, they left no stone unturned to diminish the sacredness, sanctity of the temple of education. While a collective of students, educators and alumnus swayed blindly to obscene rhythms, the very soul of the institution wept in silence: the sanctuary of learning was completely stripped of its dignity, transforming a citadel conceived for a magnificent destiny into nothing more than a cave of moral depravity. That moment, the existential purpose outworn as the temple of education born of noble ideals succumbed to the clutches of obscenity. All the purposes, visions, dream of Government of India, Constitutional fathers, public trust eroded reduced to a grotesque hub of obscenity.

3. Impact of age-inappropriate vulgar performance in School

We are social individuals bound by social norms. Dance performances fall under freedom of expression under article 19(1)(a). But the has put reasonable restriction on performances expressly citing public order, decency, morality as grounds of reasonable restriction. But, when a performance held inside the school in front of minor students, the parameter of restriction,

safety, sensitiveness is higher as compared to other places. Because, the school premises is not a private banquet hall, it is a sacred sanctuary of education.

As per *K.A. Abbas vs Union of India*¹, the motion pictures able to stir up emotions more deeply than any other products of art, *particularly affecting the impressionable minds of children and adolescents.*

By referring this case law, the author trying to draw attention of the readers about disastrous impact of age-inappropriate vulgar dance in live performance in the impressionable minds of young adolescent school children. That, too in their safe haven of school under supervision of their teachers. Through the prism of this much-admired case law, the author underscores the profoundly detrimental consequences of introducing vulgar, age-inappropriate dance performances served to an adolescent audience. The impact has no single consequence, but has a cascading effect upon the minds of young children which in turn can severely affect the fabric of our nation.

Consumption of indecent, vulgarity is associated with many negative emotional, psychological and physical health outcomes. Such obscene age-inappropriate, eve-teasing songs and dance may play a great role in enhancement of offences by juveniles.

When a child watches the obscene dances and listened the vulgar provocative songs in school premises in front of his teacher, then his mind will accept this indecency as a norm. Reason is that teachers are God / hero for students as our culture has equated teachers(guru) with Brahma, Vishnu and Maheshwar (Hindu Gods). They undoubtedly will accept every order of teacher. And if we look at scientific side, during puberty the sex hormones are higher and such performances can trigger the young mind more easily and can stir the emotions more vigorously.

Human mind consumes profanity faster than text book study. Brain is wired for survival, it prioritizes processing visceral, emotional or shocking stimuli over complex, analytical tasks like reading. There is a hormone namely "dopamine" which is certainly in news. Dopamine is associated with sensitive things. Obscenity often triggers an instant release of dopamine &

¹ AIR 1970 (Date of Judgment: 24/09/1970)
<https://globalfreedomofexpression.columbia.edu/wp-content/uploads/2016/07/Abbas-v.-India.pdf>

spikes arousal, whereas reading a book requires sustained, deep focus and time to decode meaning.

According to e-Safety Commission, Australia Government, inappropriate contents exposes children to concepts they are not developmentally ready to process. This can cause immediate emotional distress and long-term psychological impacts.²

Children are highly impressionable and mimic the vocabulary of those closet to them, often without understanding the meaning. Hearing vulgarity normalizes it, potentially limiting their ability to express emotions in nuanced way.

Now a days there is a rise of child in conflict with law at an alarming rate.

- a) Recently according to news of January 2026, a six year old girl was allegedly gang raped by three boys, all under the age of 15 at Delhi³.
- b) In September 2025, a 14 years old boy has been arrested for raping a minor girl in Jagatsinghpur, Odisha.⁴
- c) In January 2026, a 14 years old girl was gangraped by four minors of aged 17 at Puducherry.⁵
- d) Similarly in February 2026, a news of boys aged 8 & 14 gangraped 6 years old girl in UP has raised the eyebrows of civilized society.⁶

As per NCRB data, the incidents of crimes by Juveniles have been increased⁷.

The infamous Nirbhaya Delhi Gang rape case, the prime accused was a minor, who alleged to be more brutal with the victim. This case was the eye opener for Indian Judiciary, which leads to Justice Verma Committee's historical changes in Penal laws of India.

² <https://www.esafety.gov.au/educators/training-for-professionals/professional-learning-program-teachers/inappropriate-content-factsheet>

³ <https://timesofindia.indiatimes.com/city/delhi/6-yr-old-girl-sexually-assaulted-two-boys-held-one-absconding/articleshow/127642055.cms>

⁴ <https://www.newindianexpress.com/states/odisha/2025/Sep/25/14-year-old-boy-arrested-for-raping-minor-girl-in-odishas-tirto/>

⁵ <https://navbharattimes.indiatimes.com/state/tamil-nadu/chennai/a-14-year-old-girl-was-subjected-to-horrific-abuse-in-puducherry-actions-of-the-four-minors-involved-will-make-your-blood-boil/articleshow/126481034.cms>

⁶ <https://timesofindia.indiatimes.com/city/bareilly/boys-aged-8-14-gangrape-6-year-old-girl-in-up-sent-to-juvenile-care/articleshow/128016100.cms>

⁷ <https://theprint.in/india/crimes-by-juveniles-up-11-in-2024-vs-2023-highest-number-of-cases-in-bihar-says-ncrb-report/2924308/>

As per an article published in Sage journal under the heading of “sexual harassment and abuse of adolescent school girls in South India”, a research reveals that girls were vulnerable to sexual harassment within the school grounds mostly by male pupils.

Now, the question is how these children came to know the act of copulation, intercourse, eve-teasing, sexual harassment, flirt comment which are adult things and our society never openly discuss about it.

The answer lies with exposure of minor students to age-inappropriate contents publicly, whether in YouTube or in society or inside the school.

The author here expressed her own experience back to being a Class-IX student. There is a vulgar eve-teasing song on 9th standard girl namely “*navama shreni jhia ta chhati ku mo hurt karichi* (a 9th standard girl hurt my heart). Whenever, she heard this song casually, she felt uncomfortable. The atmosphere, this song specially created was horrific. She was not only who experienced this, till now any 9th standard girl heard this song, this uneasiness crept. And the remorseful thing is that, till now Government has not taken any action to crack down or ban this song.

A recent news of banning “**sarke chunar**”⁸ song is definitely a graceful and commendable step by Government of India in lieu of Article 19(2), where the Broadcasting Minister Shri Ashwini Vaishnaw **condemned this vulgar lyrical song** and assured that Government is ready with taking hard actions for the protection of children, women and deprived groups of the society.

Readers must have remembered an item song in 2010 was sought attention namely “*Sheela ki jawani*”, after which many people made memes towards former CM of Delhi “Sheela Dikshit”. This particular song became disastrous for “sheela’ named girls/women.

Similarly, in Odisha there is a song namely “*sahitya didi*” mocking the odia literature lady teachers. The author in conversation with many lady teachers have found, they felt highly mugged when any one pinging this song in front of them. Even students used to sing this song jokingly on their teachers, which shun their dignity.

⁸ <https://www.aajtak.in/entertainment/bollywood-news/story/nora-fatehi-controversial-song-sarke-chunar-ban-ashwini-vaishnaw-in-lok-sabha-tmovg-dskc-2500251-2026-03-18>

This is how the vulgar songs are polluting the minds of young children and consequently articulating a society of indecent standard.

4. Administrative apathy and compromise with the safety of children

Schools are pioneer of a civilized society, where the seeds of civic sense, morality, decency, ethics are sown.

But when seeds of obscenity, vulgarity are being sown, then the tree of vulgarity, indecent will erupt.

The remorseful part of this case is administrative apathy as well as squalid shield to the culprit headmaster. The author being aggrieved with serious child-right violations and degradation of sanctity of school environment approached CP-GRAM (Centralized Public Grievance Redress and Monitoring System), Ministry of Education, Govt of India, NCPCR as well as Janasunani CM Grievance Cell of Odisha.

CP-GRAM as promised to deliver justice within 21 days is nothing more than a mechanical case forwarding tool. Within 13 days, the case was transferred to State Project Director Odisha for taking necessary action. Then, the SPD Odisha forwarded the case to District Education Officer, Kendrapara & then this case fall to a great slumber. They just discharged their duty of forwarding the case without applying mind and acknowledging the gravity of the case. The concerned DEO was himself present at that pulpit without granting formal permission. In spite of appeal with evidences to remove the local administrator as enquiry officer because DM, DEO are present in the same function, the department turned a deaf ear to the pleading of author.

The author personally talked to concerned DEO, provided him with relevant evidences, but as he himself involved, he just harassed the author for prolonged period and gave false assurance.

Being harassed with the prolonged delay in the name of enquiry, the author speculates the cooking of something between the accused headmaster and educational administration. Then Constitutionally, the author left no stone unturned to expose the evil intent of the DEO by repeatedly sending emails to CMO, PMO, secy-edu. GOI, PMSHRI SECTION, CHIEF

SECRETARY ODISHA, SMEODISHA, SPD Odisha, Education Minister. She tried all legitimate means including posting evidences in social media platform 'X' to draw the attention of Govt. Finally DM Kendrapara locked his official District Magistrate handle, so that the author could not able to give comment on his post, remind him about his accountability or share video of the alleged vulgar conduct inside school. This case totally lost its momentum. Author repeatedly called DEO, Kendrapara but DEO never picked up the call.

Now, come to the enthusiasm of NCPCR — National Commission on Protection of Child Rights. Within 11 days of receiving the complaint, NCPCR took cognizance of the matter and forwarded the case to the District Magistrate Kendrapara. But, again the rule of law defeated in hands of administrative apathy. It has been more than 100 days of forwarding to District magistrate, the enquiry has not been initiated till now. It is a matter of surprise, where National Commission can acknowledge and take cognizance within 11 days, the District Magistrate have slept over the matter for more than 100 days.

What the author is now about to reveal, is an absolute disgrace to our entire educational ecosystem. It is a monumental blunder that completely exposed the toxic mindset and moral bankruptcy of the educational administration.

On registering her grievance in CM Grievance Cell, Odisha popularly known as “JANASUNANI”, within 12 hours the case forwarded to District Education Officer, the same person who was present at that function. From the very day receiving the complaint, the educational administration acted in flagrant violation of all established rules and guidelines, deliberately suppressing the matter for 96 day, while utterly ignoring every call and emails from the complainant.

Being vigilant and conversant with the legal procedure, the author filed an RTI with the School and Mass Education Department, Odisha for seeking the status of Janasunani. She deposited requisite fees, complied with all relevant formalities. The PIO accepted the RTI application, but did not provide the information sought. The author even alerted the Secretary, School and Mass Education, Odisha by official email about this blatant violation of the RTI Act 2005, but the statutory period lapsed in absolute silence maintained by School and Mass Education, Odisha. Even direct WhatsApp message to the concerned PIO went completely unanswered, proving the education administration has no intention of correcting lawlessness.

5. Unearthing the massive conspiracy: a systematic cover up exposed

The author toiled hard for protection of child rights and securing justice, nonetheless behind her back a deep rooted conspiracy was concocted to cover up the case in order to protect the accused headmaster and to lower the fingers raised on the educational ecosystem of Odisha. The filthy conspiracy was unearthed by an RTI application filed addressing PIO of District Education Officer, Kendrapara, Odisha.

From the RTI information the author came to know that after 83 days of receiving the complaint, the Nodal Officer (Grievance) cum Additional District education Officer, Kendrapara (*although there is no information of assigning the case to ADEO by DEO as original enquiry was directed to DEO, Kendrapara*) directed an enquiry into the case based on a tweet posted on the X account of the author. It is pertinent to mention that author has a non-premium X account, where threads are limited to 280 characters and media file up to 4. Hence, in this situation conveying the complete issue is not possible via X. The level of conspiracy had reached its peak when District Education Officer and Additional District Education Officer buried the original complaint copy and evidences received from CPGRAM/SPD and Janasunani and directed the Block Education Officer, Rajkanika to conduct the enquiry on the basis of a short thread posted on X. Even, the videos posted by the author was not mentioned by the Additional District Education Officer cum Nodal Officer (Grievance) Kendrapara as well as enquiry officer cum Block Education Officer, Rajkanika.

6. Dereliction of duty by Block education Officer

This was never a mere administrative oversight; it was a meticulously calculated, deeply entrenched conspiracy designed to safeguard systemic rot. A direct nexus comprising the District Education Officer (DEO), Additional District Education Officer (ADEO), and the Block Education Officer (BEO) actively colluded to bury a grave grievance. Instead of acting as an impartial investigator, the BEO, Rajkanika, compromised the very dignity of his office, abdicating his statutory duties to act as a puppet and an agent for the perpetrators. Sitting in the comfort of his office, he fabricated a convenient, fictional narrative, reducing a solemn inquiry into a ridiculous cover-up.

7. A Flagrant Violation of Natural Justice

The foundational bedrock of administrative law dictates the principle of *Audi alteram partem*-that both sides must be given a fair hearing. Yet, the BEO stripped away his judicial and moral obligation. It is to be noted providing fair opportunities of being heard to both the parties is a mandatory provision U/s.32 w.r.t complaint of child right violation as enshrined in Right to Education Act 2009.

Without analyzing a single piece of evidence or evaluating the weight of the allegations, the BEO, Rajkanika unilaterally dismissed the complainant's grievance as baseless.

The Headmaster, the very individual who permitted the poisoning of young minds with blatant obscenity within a school campus was completely exonerated and declared immaculate. Shockingly, while the BEO admitted that the incident occurred inside the school premises, he inexplicably absolved the Headmaster of all liability.

This finding exposes a catastrophic ignorance of rudimentary law. The BEO failed to realize that a Headmaster is the legal custodian of the institution and stands in *loco parentis* (in place of a parent) to minor students. The Headmaster himself admitted in a prior RTI (addressed to PIO cum headmaster) disclosed that he had permitted the organizing agency i.e alumnis to host the function. Despite this documentary admission, the BEO failed to provide any rationale or legal basis as to how the Headmaster possessed no active participation or culpability.

8. The Dead Conscience of Education Administration

In a display of sheer moral bankruptcy, the inquiry report bizarrely notes that while certain performances were "inappropriate" for minor children, albeit they did not amount to a child rights violation. It was just a poor judgment. The BEO failed to offer any *ratio decidendi* (legal reasoning) to justify how vulgar, obscene performances inside a temple of learning do not violate child rights, effectively normalizing such indecency within school walls. It's a flabbergasting fact that an obscene vulgar dance performance was reduced to a 'poor judgment' term in order to exonerate the accused headmaster from penalty. The moment the BEO penned this fabricated, corrupted report to shield an offender, the very soul of the education system perished. By actively defending and white-washing institutional obscenity, the BEO has pushed the future of innocent children into a moral abyss.

9. A Subterranean, Rushed Cover-Up

The clandestine manner in which this inquiry was wrapped up within a mere three days speaks volumes of its malicious intent. As an inquiry officer, the BEO never issued a formal summon or notice to the complainant, never called the complainant to record a statement or demand original evidence, and failed to even verify the source material—completely ignoring the primary X (formerly Twitter) account post and the underlying video evidence that triggered the mass outrage.

Despite having the complainant's active phone number and corresponding address, email address readily available on record, the inquiry was conducted in total secrecy to hush up the matter before it caught public attention. To complement this fraud, when the ADEO issued the formal memo, a **deliberately falsified address of the complainant was inserted into the official text. This was a desperate, malicious tactic to ensure the complainant would remain completely in the dark about how the DEO, ADEO, and BEO were pooling their institutional power to suppress the case.**

The fabricated nature of the BEO's report completely crumbles when contrasted with true facts obtained via the Right to Information Act, 2005. While the Headmaster's RTI reply explicitly states he requested permission from the DEO but never received any written authorization, and the DEO's office officially confirms they have no record of any such permission being granted, BEO Rajkanika chose to manufacture a blatant lie. In his inquiry report, he went as far as claiming the headmaster possessed a valid permission letter, deliberately inventing a fictional clearance just to create an escape route for him.

This shameless distortion of truth brings unmitigated ignominy upon the entire educational fraternity. By rendering a clean chit based on falsehoods, this administrative nexus has set a dangerous, highly destructive precedent.

Today, this report gives a free pass to every school in Odisha to host indecent and vulgar displays under the facade of school functions, systematically corrupting the minds of minor children. Should this cultural degeneration persist, the Block Education Officer, kendrapara stands as its primary, undeniable perpetrator.

10. The Collapse of the Educational Administration: A Pre-Meditated Execution

What followed was the final, breathtaking collapse of the entire education administration, a rapid-fire execution designed to bury the truth permanently. The speed with which this case was shut down underscores a coordinated effort to suppress evidence rather than evaluate it.

11. The Protest Petition and Immediate Suppression

The moment the blatant contradictions were exposed through the RTI disclosures, the author cum complainant acted with utmost urgency. Within a mere 11 hours, a detailed Protest Petition was dispatched to the District Education Officer's (DEO) official email (at 12:16 am midnight), meticulously raising every discrepancy and formally requesting a fresh, impartial inquiry.

The following day, hoping that a sense of administrative honesty might still prevail, the author forwarded the entire video evidences directly to the DEO's official mobile number. Despite multiple attempts to establish contact, the DEO repeatedly declined the calls. When he finally answered for a fleeting few seconds, he offered explicit assurances, stating that a new inquiry under two senior officials would be instituted. Acknowledging receipt of the Protest Petition, he instructed the author to wait without anxiety.

This assurance, however, found to be a cruel institutional deception, however the author cum complainant recorded the whole conversations in call recording.

12. The ADEO's Fraudulent Dispatch

Within a single hour of the DEO offering those false assurances, the Additional District Education Officer (ADEO) abruptly closed the matter. Labeling the grievance entirely baseless and asserting that no child rights violations had occurred, the ADEO rushed the final report to the Additional Secretary of the School and Mass Education Department.

To ensure the complainant remained completely disenfranchised, the Nodal Officer (Grievance) cum ADEO, Kendrapara resurrected the tactic of using a falsified address on the official copy. In a bid to drape the report in legal legitimacy, the ADEO claimed to have "**carefully scrutinized**" the matter. Yet, this assertion stands as a testament to deep-seated administrative malice stated as follow:

- i) Exclusion of the Complainant: No scrutiny could legally or logically be complete without engaging the complainant or examining the primary evidence.
- ii) Absence of Reasoned Findings: The report offered absolutely no rationale, legal basis, or justification for its sweeping conclusions.

By reducing the statutory process to a farce, the ADEO tore the rule of law to shreds. In doing so, she did not just vacate her official responsibilities; she actively became a perpetrator, endorsing obscenity within a school and permanently tarnished the sanctity of an institution she was legally bound to protect.

13. The Rubber-Stamp Dismissal by the Secretary

The final, fatal blow to justice was delivered at the highest administrative tier. Upon receiving the file, the Secretary of School and Mass Education blindly accepted the findings without a moment's hesitation or independent evaluation.

The apex office completely blinded itself to glaring institutional failures:

- I. It ignored the fact that the original complaint originated from a formal Janasunani (public grievance) portal, yet was reduced by subordinates to an inquiry based on a single, isolated post on X.
- II. It ignored the absolute violation of natural justice, where the aggrieved party was systematically denied a hearing.
- III. It failed to question the absurd, self-contradictory logic of the BEO and ADEO's reports, which labeled the performances "inappropriate" for minors yet claimed no child rights were violated.
- IV. It refused to look into how a Headmaster-the legal custodian of the campus-could be absolved of liability for an event which conducted inside the premises of School.

Instead of demanding accountability, the Secretary merely penned a single, dismissive line stating that the DEO's report was "self-explanatory," summarily closing the case.

14. The Death of Institutional Sanctity

With that final signatural remark, the case breathed its last- and with it, the moral sanctity of the educational system perished. The tragedy of this case lies in the identity of its executioners. The institutional degradation was initiated by a Headmaster who desecrated his own school,

and it was systematically protected, rationalized, and white-washed by the highest echelons of the educational hierarchy -the BEO, the ADEO, the DEO, and the Secretary of School and Mass Education.

Despite a timely, documented Protest Petition, the complainant was stonewalled at every turn, denied even a rudimentary opportunity to be heard. The perpetrator walked away entirely unblemished, leaving behind an educational system thoroughly exposed, deeply compromised, and utterly disgraced. To protect a few morally corrupt elements, the whole administration compromised the integrity of the entire educational ecosystem- polluting the campus and staining the sanctity of education itself.

It is a matter of surprise that the case which was closed in a fraudulent, clandestine manner devoid of bearing name of any officer associated right from BEO, ADEO, DEO, Addl. Secretary School and Mass education and Secretary School and Mass Education. It is highly suspicious that a case closed on CM Grievance Cell, but none of the report bears the name of Officers who are associated with the case. Prior to it, when Ministry of Education, Government of India forwarded the case to Odisha State Government, the report bore name of Joint Secretary to Department of School and Mass Education. This discrepancy, highlights the unkempt practice of confusing the complainant by entangling her in a mess, so that she would never contact with the relevant Officers and reopen her case.

15. Legal provisions and regulatory interventions

The concert of obscene song and vulgar dance within the sacred precincts of education institutions transcends mere disciplinary misconduct: it constitutes a profound breach of multiple statutory frameworks, constitutional guarantees and codified service jurisprudence.

- a) **Article 21 of the Constitution of India:** - Right to life under Article 21 is not merely confined to animal survival, but encompasses the right to live with human dignity, decorum and a safe environment.

Converting an educational sanctuary into a venue for obscenity profoundly compromises the moral and psychological safety of students, there is an egregious violation of the core tenets of Article 21.

- b) **Article 21 A⁹ of the Constitution of India:-** This Article mandates the State to provide free and compulsory education. But, here this fundamental right is not merely imparting education within classroom or finishing the syllabus. This fundamental right went beyond the textbook study and aimed at welfare of children within the school campus. The ‘education’ word used in Article.21 A is nor merely textbook education, but also quality, safe, moral education within a conducive atmosphere.
- c) **Article 39(f) of the Constitution of India :-** This clause explicitly directs the State to ensure that children are given opportunities and facilities to develop in a healthy manner and in conditions of freedom and dignity and protected against exploitation and moral and material abandonment.
- When the headmaster exposed the minor students to age-inappropriate contents inside school premises he has actively exploited the innocent childhood and morally abandoned them. He derelict his statutory duty. The State has delegated to him the duty to protect these minor students from moral exploitation, ironically the headmaster himself endangered the mind of young adolescent.
- d) **Section 17 of Right to Education Act, 2009¹⁰ :-** A bare reading of Sec.17 of the RTE Act, 2009 explicitly debarred the education institution to put any child into mental harassment.
- When a child is exposed to an obscene environment which is age-inappropriate for that child, it can inflict a deep psychological harm and can pose a negative cascading effect upon the mind of the child.
- e) **Section 29 of the RTE Act, 2009: -** This section mandates that the academic authority, while laying down the curriculum, must ensure the all-round-development of the child, in conformity with values enshrined in Constitution, making free of fear, trauma and anxiety and helping the child to express views freely.

⁹ Inserted by 86th CAA (2002)

¹⁰ ACT NO. 35 OF 2009

When we are speaking about Constitutional value, it denotes equality, fraternity, justice, liberty as enshrined in the preamble.

None of our Constitutional value ever advocates for imparting vulgar, obscene, age-inappropriate lores to minors. Constitution of India has specifically addressed the plight of early childhood and vision of converting an untainted child to responsible valuable citizen.

The headmaster by exposing this vulgarity to minor students including girls has ignited a lifelong trauma to girl students. Because, when the eve-teasing song has been normalized in school premises, then certainly some boys will quip the girl students by such eve-teasing song in school campus. This will make the girls to sustain in constant fear in their safe haven of school

- f) **Section. 75 of The Juvenile Justice Act 2015¹¹** :- Section. 75 of the JJ Act 2015 lays a mandatory obligation on the person in actual charge of or control over a child to abstain from abandonment, abuses, exposure or willfully neglect in a manner likely to cause unnecessary mental suffering.

Here, in this case, the headmaster stands as the loco parentis willfully exposed the vulnerable minor students to such an age-inappropriate obscene environment, which has caused unnecessary mental suffering.

Interestingly, on conversion with Enquiry Officer cum Block Education Officer (after clandestine submission of report), he told that students enjoyed these dances and no one complained about it, so it does not amount to violation of child rights.

It is deeply disappointing that, a responsible Block Education Officer failed to assess the severe psychological and moral impact of such vulgarity on vulnerable minor children, but chose to hide behind the naïve statements of minors to shield a blatant infringement of child rights.

- g) **Section 2(c) of Indecent Representation of Women Act¹²** – Section 2(c) of the IRWA, 1986 defined indecent representation of women means the depiction in any manner of the figure of a woman, her form or body or any part thereof in such a

¹¹ ACT NO. 2 OF 2016

¹² THE INDECENT REPRESENTATION OF WOMEN (PROHIBITION) ACT, 1986
ACT NO. 60 OF 1986

way as to have the effect of being indecent, or derogatory to, or denigrating women, or is likely to deprave, corrupt or injure the public morality or morals.

In this case, when the dancers put on age-inappropriate attire of bust attracting lingerie and shorts, the costume was enough to corrupt the morality of the minor children and tarnish the dignity of educational institution.

Wearing highly revealing, bust-accentuating outfits to draw attraction towards sensitive part of women body is inherently provocative and unsuitable for young and impressionable minds.

Recently Karnataka Government have recently issued official circular mandating strict decency in school uniforms to maintain institutional decorum. It is highly ironical and deeply concerning that school authorities in Odisha are permitting indecent dances with highly inappropriate clothing within school precincts.

- h) Mission statement of PMSHRI Schools-** The flagship Centrally Sponsored Scheme of PM SHRI Schools guidelines underscores its mission of preparing the PM SHRI School as an exemplary School where a safe and stimulating learning environment is to be exist. But here, in this case the headmaster turned a nelson's eye towards the purpose, mission, aim of the PM SHRI School and polluted as well as diminished the sanctity of educational temple.
- i) NCPCR guidelines-** NCPCR guidelines bestowed obligations on teachers to ensure safety and security in schools. It directs social curriculum to teach students social and emotional skills, including healthy relationships and bully prevention. But, here the headmaster passively ensuring bullying between students as eve-teasing songs are agents for bullying of girls in school.
- j) Odisha Government Servant Conduct Rules 1959¹³** – Section 3 mandates the Government servant to maintain absolute integrity, decorum of conduct and devotion of duty and to abstain from personal immorality or moral turpitude. Here the headmaster of the school being a Government servant has immensely diminished his decorum of conduct as a respectable teacher and shown his utter moral turpitude, which is completely unbecoming of a Government servant.

¹³ Published in Orissa Gazette on the 1st May 1959

- k) **Section.296 of the Bharatiya Nyaya Sanhita 2023-** Section 296 punishes the offender who does any obscene act in any public place, sings or recites or utters any obscene song.
- l) **Section 11 of POCSO Act¹⁴-** This vulgar dance and obscene song performances in front of minors inside school premises under supervision of teachers also attracts punishment u/s. 12 of the POCSO Act, where as section 11 defines it. As per Section 11(i) and (iii) of the Act, any person with sexual intent, utters obscene words, makes suggestive gestures of exhibit pornographic or vulgar contents in a manner that it is seen or heard by minor student, directly commits the offence of sexual harassment upon the children.

Recently Allahabad High Court has barred any commercial activities including and not limited to exhibitions, fairs, etc., in the premises of all educational institutions in Uttar Pradesh¹⁵.

By this verdict, the Hon'ble High Court acknowledged misuse of sanctuary of education by School administration. While delivering this Judgment, Hon'ble High Court Observed that educational institutions are meant for imparting education only and not for permitting commercial activity.

16. Battle has not been extinguished yet- a miles to go for protection of child rights

While the corridors of bureaucracy may have closed their doors and sealed the file with a compromised 'clean chit', the ultimate battle for accountability remains open. The administrative closure is not the end; it is merely the prologue to a relentless legal crusade. The matter will now be taken to the temple of Justice- the Court of law. Challenging a deeply entrenched nexus of powerful officials requires a prolonged battle, but history bears witness that institutional tyranny requires an uphill battle, and the same history bears witness that institutional tyranny consequently bows down before rule of law. Whether it was Narmada bachao or Chipko movement, the reformers harassed, but never bent before autocracy. The fight to purge our schools from obscenity and restore ethics, value, morality is underrated. The administrative chapter has been closed, but the judicial reckoning has just began.

¹⁴ Act No.32 of 2012 The Protection of Children from Sexual Offences Act, 2012

¹⁵ <https://www.livelaw.in/high-court/allahabad-high-court/allahabad-high-court-bans-exhibitions-and-trade-fairs-on-school-premises-308164>

17. Magnificent example of Strict and stringent action to curb vulgar dances by other States of India

This school vulgarity is not the first case in India, but it might be the first case where the headmaster has been shielded by higher educational officers of State. Because, in other States, concerned Educational Officers are taking strict and stringent action against the perpetrator headmaster in order to restore sanctity of the schools. Following are some notable examples.

- a) In September 2025, the principal of a primary School in Kanpur was suspended by the Education Officer for organizing vulgar dance in school¹⁶.
- b) In January 2026, SDO removed and 3 cops suspended over attending obscene dance event at Chhattisgarh.¹⁷
- c) In March 2026, headmaster suspended and service of 2 teachers were terminated for organizing obscene vulgar dances in a Govt school in Jharkhand.¹⁸
- d) In February 2026, the Andhra Pradesh Government took a serious note of obscene dances organized in a residential school and placed the deputy warden under suspension.¹⁹
- e) In March 2026, headmaster suspended over 'obscene' dance video with minor in Jharkhand.²⁰
- f) In January 2026, Obscene dance at Govt school costs Rozgar Sahayak his job in Chhattisgarh²¹
- g) In January 2019, headmaster suspended after vulgar dance programme organized in primary school of Uttar Pradesh.²²

¹⁶ <https://timesofindia.indiatimes.com/city/kanpur/vulgar-dance-in-school-principal-suspended/articleshow/124055220.cms>

¹⁷ <https://www.hindustantimes.com/cities/other/chhattisgarh-sdo-removed-3-cops-suspended-over-attending-obscene-dance-event-101768237404139.html>

¹⁸ <https://navbharattimes.indiatimes.com/state/jharkhand/garhwa/major-action-taken-against-obscene-dance-at-garhwa-school-headmaster-suspended-two-teachers-terminated/articleshow/129086546.cms>

¹⁹ <https://www.deccanchronicle.com/southern-states/andhra-pradesh/deputy-warden-suspended-for-organizing-obscene-dances-in-ap-school-1935964>

²⁰ <https://indianexpress.com/article/india/jharkhand-garhwa-school-headmaster-suspended-obscene-dance-video-10568397/>

²¹ <https://timesofindia.indiatimes.com/city/raipur/obscene-dance-at-govt-school-costs-rozgar-sahayak-his-job-in-chhattisgarh/articleshow/127458070.cms>

²² E-Newspaper, THE TIMES OF INDIA, 06.01.2019

18. The admirable step by Karnataka Government to ban obscene song and vulgar dances in school

Recently Karnataka Government has set up a highly applauding commendable step of total prohibition of vulgar dance and obscene songs and made this despicable act as a punishable offence underscores its vision as a progressive State.²³ Karnataka has recently elevated its commitment to child welfare and institutional sanctity to a benchmarking paradigm.

19. Ban on use of social media for minors

Acknowledging the catastrophic impact of inappropriate contents on minor children, following steps has been taken by various foreign nations.

- 1) Recently in May 2026, Malaysia became the latest country to ban social media access for children under 16 years.²⁴
- 2) Australia is the first country to pass a historic Under-16 social media ban.²⁵
- 3) Indonesia implemented a strict ban blocking minors under 16 from mainstream social platform²⁶.
- 4) Portugal formally passed a statutory minimum age threshold of 16 for social platforms.²⁷

20. Applauding steps by Indian States

Recently Karnataka Govt announced a proposal for ban of social media for children under 16 during State's 2026-27 budget sessions.²⁸

Similarly Goa is also examining the possibility of restricting social media use for children below 16.

²³ <https://timesofindia.indiatimes.com/city/bengaluru/karnataka-bans-obscene-songs-and-dance-at-school-events/articleshow/130598733.cms>

²⁴ <https://www.thehindu.com/sci-tech/technology/malaysia-enforces-ban-on-social-media-accounts-for-children-younger-than-16/article71046852.ece>

²⁵ <https://www.bbc.com/news/articles/cwyp9d3ddqyo>

²⁶ <https://asia.nikkei.com/business/technology/indonesia-s-social-media-age-limit-forces-platforms-to-gatekeep-for-minors>

²⁷ <https://www.reuters.com/world/europe/portugal-approves-restrictions-social-media-access-children-2026-02-12/>

²⁸ <https://www.thehindu.com/news/national/karnataka/karnataka-proposes-to-ban-social-media-for-children-under-16-years/article70710597.ece>

Similarly Andhra Pradesh Government considering stricter regulations to limit social media access for children of a certain age.

21.Way forward

At a time when pioneering states like Karnataka, Andhra Pradesh, Goa are actively legislating to restrict social media for minors to shield them from moral degradation, educational ecosystem of Odisha must not lag behind. School environment must be preserved as secure, sanctified spaces focused virtuously on character building and learning. Moreover, the State's administrative machinery must re assess it with national child welfare parameters. Strict and absolute accountability must be fixed on educational institution's head. Proper and vigilant supervision must ensure that future inquiries should prioritize institutional decorum, child rights, child psychology, statutory guidelines, moral impact over superficial defenses and conspiracy to bury the matter. State legislature should pass legislation by labeling vulgarity and obscenity inside school as a punishable offence with exemplary punishment to head of the institution. Strict and absolute liability must be fixed in case of child right violation.

A training program should be conducted to impart Educational Officers of States including Block Educational Officers, Additional District Education Officers and District Education Officers about knowledge regarding the horizon of child rights violations, statutory laws and the fair process of inquiry.

WHITE BLACK
LEGAL