



## Child Protection & Safeguarding Policy – Going to School

**Going to School (GTS)** is committed to the comprehensive protection, inclusion, dignity, safety, health, mental well-being, and full development of every child and young person who engages with our programs—whether in schools, communities, homes, playgrounds, or digital and virtual spaces. This commitment applies at all times and in every environment where children are present and GTS teams operate, including during skill-based learning, sports, co-creation of content, media production, and research activities.

We uphold a **zero-tolerance approach** to any form of harm, neglect, abuse, discrimination, or exclusion. This Child Protection and Safeguarding Policy (CPP) reflects our institutional, ethical, and legal responsibility to ensure that all individuals representing or associated with GTS—full-time or part-time staff, researchers, designers, educators, writers, digital or content creators, interns, volunteers, trustees, vendors, or partners—behave in accordance with the highest standards of conduct, and take *immediate and mandatory action* when witnessing or suspecting a breach of this policy.

### **1. Definition of a Child in the Context of Going to School Programs**

A **child**, in accordance with Indian law and GTS policy, is defined as:

Any individual from the moment of conception until the completion of 18 years of age, regardless of their background, identity, ability, gender, or socio-economic status.

This definition aligns with:

- **The United Nations Convention on the Rights of the Child (UNCRC)**
- **The Juvenile Justice (Care and Protection of Children) Act, 2015**
- **The Protection of Children from Sexual Offences (POCSO) Act, 2012**
- **The Rights of Persons with Disabilities Act, 2016**
- **The Constitution of India (Articles 15, 21A, and others)**
- **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011**

GTS recognizes that children and young people are rights-holders and citizens. We affirm that **every child**, regardless of caste, class, religion, language, ability, gender identity, sexual orientation, place of birth, or other status, deserves **equal protection, participation, access, and opportunity**.

Children, by virtue of their age and dependency, are more vulnerable to exploitation and harm. This vulnerability is further compounded for children from historically marginalized communities—such as Scheduled Castes (SC), Scheduled Tribes (ST), religious minorities, economically disadvantaged groups, children with disabilities, and LGBTQIA+ children. GTS's CPP aims to proactively mitigate and address these risks through inclusive, rights-based, and child-centered approaches.



## **2. Commitment to DEI, Intersectional Inclusion & Legal Safeguards**

- **Diversity, Equity & Inclusion (DEI):** GTS embeds DEI in all operations, ensuring that children are not excluded or discriminated against based on their social identity or lived experience.
- **Gender Sensitivity:** All activities will uphold principles of gender equity and safety, especially in traditionally male-dominated or mixed environments.
- **Inclusion of Children with Disabilities:** In accordance with the **RPWD Act**, all programs are designed to be accessible, inclusive, and affirming of neurodiverse and physically diverse children.
- **Caste, Class & Religion:** GTS opposes all forms of casteism, classism, and communal bias, affirming children's equal rights and full personhood.
- **Data Privacy & Protection:** Any personal, health, biometric, or digital data collected about children is handled with strict confidentiality, consent, and compliance with Indian IT laws. No data is collected or shared without guardian consent, and children's digital identities are protected at all times.

## **3. Scope of GTS Programs & Stakeholder Roles**

GTS's child-facing programs include (but are not limited to):

- Skill education in schools and field locations
- Content co-creation (films, shows, digital media)
- Internships with entrepreneurs
- Research (baseline, endline assessments)
- Sports and creative learning environments

These programs are carried out in **multi-stakeholder environments**, involving:

- Schools, teachers, and families
- Local governments and community organizations
- Freelance professionals and content producers
- Peer educators and mentors

The effective safeguarding of children depends on the **honesty, integrity, commitment, and vigilance** of every individual in this ecosystem. GTS affirms that the **implementation of this policy is not optional**; it is an ethical mandate and legal requirement.

## **4. Scope of the Policy**

This **Child Protection and Safeguarding Policy** applies comprehensively to all individuals and entities associated with **Going to School (GTS)**, whether directly or indirectly involved in programming, outreach, content creation, or administrative functions. The scope reflects the organization's commitment to upholding **inclusion, safety, and dignity for all children**, in accordance with Indian law and best safeguarding practices.



## This policy applies to:

- **GTS Internal Stakeholders:** All full-time and part-time employees, trustees, consultants, team leads, researchers, designers, writers, content and technology teams, sport instructors, HR and finance staff, interns, and volunteers.
- **GTS Project Partners:** All individuals affiliated with organizations working in partnership with GTS, including directors, coordinators, team members, consultants, interns, and volunteers involved in program execution, research, training, or media production.
- **GTS Associates:** Any individual or organization providing services to GTS—vendors, sponsors, funders, suppliers, media houses, digital platforms, transportation providers, or educational technology companies—who may come into contact with children or children’s data through their work.
- **Associates of GTS Project Partners:** All third-party actors affiliated with partner organizations, including vendors, funders, contractors, interns, or delivery agents, operating in any environment where children are engaged in GTS programs.

**Non-negotiable expectation:** All persons covered under this scope are bound by the principles, rules, and procedures of this policy and are required to undergo orientation and sign acknowledgment of their responsibility under the Child Protection and Safeguarding framework of GTS.

## 5. Review of the Policy & Guiding Principles

### Review Cycle:

This policy will be reviewed at a minimum **every three years**, or earlier if required by changes in Indian law, international best practices, programmatic shifts, or organizational learning. Reviews will be conducted by the designated Safeguarding Lead and Child Protection Committee, with oversight from the Executive Director.

All revisions will be communicated promptly and **compliance with updated provisions will be mandatory** for all individuals and organizations within the scope of this policy.

## 6. Guiding Principles

### 1. Children as Rights-Holders

Every child is a full rights-holder as per the Indian Constitution, the UNCRC, and relevant domestic laws. Children must be treated with dignity, autonomy, and respect, regardless of their background, identity, or ability.

### 2. Inclusion and Non-Discrimination

GTS maintains a **zero-tolerance policy** for any form of exclusion or discrimination based on **caste, class, gender identity, sexual orientation, language, religion, ability, neurodiversity, or geographic origin**. We actively promote **intersectional inclusion** in every aspect of our programming and partnerships.

### 3. Privacy & Data Protection

Children’s personal data—including digital images, identity details, contact information, and participation records—must be **collected, stored, used, and deleted in strict compliance** with the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011**, and with guardian-informed consent.



4. **Consent and Autonomy**  
Participation in content production, interviews, surveys, or media must be **voluntary**, with clear and age-appropriate explanation, and **guardian-signed consent**. Children's right to withdraw consent must be honored at any time.
5. **Voice & Expression**  
Every child has the **right to be heard**. GTS ensures that children's opinions are actively sought, acknowledged, and considered in program design, delivery, and assessment, in alignment with Article 12 of the UNCRC.
6. **Zero Tolerance for Abuse**  
Any form of **physical, emotional, sexual, digital, institutional, or discriminatory abuse**, including **implicit enabling** by failure to report, is strictly prohibited. All GTS staff and affiliates are **mandatory reporters** of suspected or known abuse.
7. **Collective Responsibility**  
Every person bound by this policy is responsible not only for their own conduct but for intervening and **reporting any breach or violation** by others. **Silence, complicity, or failure to act** constitutes a serious violation of this policy.

## **7. Objectives**

Going to School's Child Protection and Safeguarding Policy is designed to uphold the **highest standards of child rights, safety, equity, and accountability** across all programs and partnerships. The core objectives of this policy are to:

1. **Ensure Universal Protection**  
Safeguard *every* child involved in GTS programs—regardless of age, gender, caste, class, religion, disability, or sexual orientation—through legally compliant, context-responsive, and child-centered protection strategies.
2. **Establish a Robust Reporting and Redressal Mechanism**  
Provide a **clear, confidential, and timely system** for reporting child protection concerns or violations, with defined roles, escalation paths, and deadlines. Ensure redressal processes are *trauma-informed, non-discriminatory, and sensitive to the needs of children from marginalized groups*.
3. **Institutionalize Safeguarding Across All Delivery Environments**  
Apply child safeguarding standards consistently in **schools, community sites, digital platforms, content creation settings, sports events, internships**, and any physical or virtual location where GTS operates.
4. **Mandate Accountability for All Associates and Partners**  
Ensure that all individuals, vendors, organizations, and government partners working with or on behalf of GTS **understand, endorse, and implement** child protection and safeguarding principles without exception.
5. **Foster a Culture of Awareness and Inclusion**  
Create continuous learning opportunities through **mandatory inductions, quarterly refreshers, simulations, and reflective exercises** to strengthen child protection literacy among all GTS representatives. Emphasize **intersectional risk awareness** and the specific needs of children with disabilities, girls, non-binary children, and children from historically excluded communities.



## 6. Integrate Legal Compliance and Global Standards

Align all safeguarding actions with relevant laws, including the **POCSO Act**, **JJ Act**, **RPWD Act**, and **UNCRC**, and commit to global safeguarding benchmarks in data protection, consent, and digital safety.

## 8. Policy Statement

Going to School (GTS), a creative not-for-profit educational organization, affirms its unwavering commitment to the **safety, dignity, well-being, development, and active participation** of children and young people across all its programs, projects, and community engagements.

This **Child Protection and Safeguarding Policy** establishes GTS's legal and ethical obligation to provide **safe, inclusive, equitable, and empowering environments** for children, especially those who face intersectional vulnerabilities related to **gender, caste, disability, religion, sexual orientation, class, and socio-economic status**.

GTS's CPP framework:

- **Mandates full compliance** with the **Protection of Children from Sexual Offences (POCSO) Act**, the **Juvenile Justice Act**, the **Rights of Persons with Disabilities Act**, and other applicable Indian and international statutes.
- **Operationalizes a proactive safeguarding culture**—not only responding to risks, but **anticipating, preventing, and mitigating** them across all activities and touchpoints.
- **Applies to all individuals and organizations** who are a part of the GTS ecosystem—whether through direct employment, partnership, contractual association, or voluntary engagement.
- **Emphasizes the primacy of the child's voice** and agency in all safeguarding matters.

### **Mandatory Reporting Clause:**

Every individual within the scope of this policy is a **mandatory reporter**. If you **witness, suspect, or are informed** about a potential or actual violation of child safety—whether physical, emotional, sexual, discriminatory, digital, or institutional—you are **legally and morally obligated** to report it **immediately**. Failure to report or take action constitutes **complicity** and is considered a **breach of policy**.

## 9. Definitions

### Child Protection

**Child Protection** refers to all activities, policies, procedures, and practices designed to protect children from **violence, abuse, exploitation, neglect, and discrimination**, whether real or perceived, in any setting—physical, digital, emotional, or social.



It includes **preventive and responsive actions** to uphold a child's **right to safety, dignity, bodily integrity, development, and participation** under Indian law and international conventions. Child protection is anchored in:

- The **Juvenile Justice (Care and Protection of Children) Act, 2015**
- The **Protection of Children from Sexual Offences (POCSO) Act, 2012**
- The **United Nations Convention on the Rights of the Child (UNCRC)**

Every child, regardless of identity, ability, or circumstance, is entitled to comprehensive protection—including those in care, in institutions, in conflict zones, and in informal learning environments.

### **Child Safeguarding**

**Child Safeguarding** is the broader, proactive responsibility to ensure that every interaction, program, structure, or institution that comes into contact with children **actively prevents harm, exclusion, abuse, or discrimination**.

While child protection is often **reactive**, safeguarding is **preventive and systemic**—integrating safety measures, codes of conduct, staff training, risk assessments, and digital protocols into every level of organizational planning.

Safeguarding also involves **empowering children** to understand their rights, speak up, and participate safely in decision-making processes

### **Child Abuse**

**Child Abuse** refers to any deliberate or negligent act that harms, endangers, or violates a child's body, mind, emotional development, or dignity. Abuse can be physical, emotional, sexual, digital, or institutional.

#### **Types of Abuse:**

- **Physical Abuse:** The use of physical force (e.g., hitting, beating, burning) that results in or is likely to result in bodily harm, pain, or injury.
- **Emotional Abuse:** Repeated verbal aggression, rejection, belittling, bullying, intimidation, or exclusion, impairing a child's self-worth or emotional well-being.
- **Sexual Abuse:** As defined under the **POCSO Act, 2012**, this includes:
  - Penetrative and non-penetrative sexual acts
  - Sexual harassment (e.g., inappropriate touching, exposing pornography)
  - Use of children in pornographic content or digital grooming
  - Attempt or abetment of such acts
  - Aggravated offenses by persons in authority (e.g., teachers, police, family members)
- **Neglect:** The failure to provide necessary care, supervision, affection, or support that endangers the child's well-being.



- **Digital Abuse:** Online harassment, exposure to harmful content, invasion of digital privacy, or data misuse.

### **Data Protection (in the Context of Children)**

**Data Protection** is the ethical and legal obligation to **collect, use, store, share, and delete** children’s data in ways that prioritize safety, confidentiality, and consent.

This includes:

- **Biometric and personal identification data**
- **Photographs, video/audio recordings**
- **School records, survey responses, health information**
- **Digital communications or interactions**

Going to School complies with:

- **Information Technology Act, 2000**
- **IT Rules, 2011 (Sensitive Personal Data or Information Rules)**
- Any future personal data protection legislation

Consent must be **informed, voluntary, and documented**, with children’s **right to withdraw consent** upheld at all times.

### **Diversity, Equity, and Inclusion (DEI)**

**DEI** is the active and intentional practice of creating environments where **all children—regardless of gender, caste, class, ability, language, religion, or identity—feel safe, valued, and included.**

- **Diversity** acknowledges and celebrates differences.
- **Equity** ensures fairness by addressing structural barriers and providing differentiated support.
- **Inclusion** ensures that every child has equal access to participation, resources, learning, and protection.

DEI is not an add-on; it is **central to ethical education, safeguarding, and justice.**

### **Inclusion**

**Inclusion** means removing physical, emotional, social, and institutional barriers so that **every child—especially those from marginalized communities—can learn, thrive, and be protected.**

This includes:

- Accessible infrastructure and communication
- Assistive technologies for children with disabilities
- Representation of diverse cultures and genders
- Equitable opportunities for learning and expression



Inclusion also implies **active outreach** to ensure no child is left behind due to social stigma, disability, language, or economic condition.

### **Gender (in the Context of Safeguarding)**

**Gender** refers to the **social and cultural roles, behaviors, identities, and expectations** assigned to individuals based on perceived sex. Going to School acknowledges a **spectrum of gender identities** beyond the binary of male and female, including non-binary, transgender, gender non-conforming, and intersex identities.

All safeguarding actions must:

- Address gender-based risks (e.g., gendered violence, exclusion)
- Ensure gender-responsive programming (e.g., mixed-gender facilitation teams)
- Promote **gender equality, respect, and agency** for all children, regardless of identity

GTS affirms that **gender justice is fundamental to child protection**.

### **10. Scope of Application of the Child Protection and Safeguarding Policy (CPP)**

This **Child Protection and Safeguarding Policy (CPP)** applies comprehensively to **all individuals and institutions** associated with Going to School (GTS), including but not limited to:

- **Full-time and part-time employees**
- **Freelance and contract-based staff**
- **Consultants, interns, volunteers, and field researchers**
- **Trustees, vendors, and suppliers**
- **Content creators, technologists, and production crews**
- **Project partners and their extended networks**
- **Sponsoring or funding agencies who interact with children**
- **Any person or entity contractually or operationally affiliated with GTS programs**

The policy covers every **location, medium, and activity** in which children engage through GTS—whether in **schools, community spaces, sports fields, digital platforms, co-created content, research activities, or during internships with entrepreneurs**.

This policy is also binding upon **indirect actors** who may not work with children face-to-face but **interact with or process children’s data, images, digital content, or representation**.



## **11. Universal Commitment and Legal Compliance**

Each person or group falling within the scope of this policy is:

- **Legally bound** to comply with the CPP as part of their **contractual obligations** with GTS.
- Subject to **mandatory safeguarding orientation and training** as a prerequisite for engagement.
- Expected to **uphold child rights and DEI standards**, in accordance with:
  - The **Protection of Children from Sexual Offences (POCSO) Act, 2012**
  - The **Juvenile Justice Act, 2015**
  - The **Rights of Persons with Disabilities Act, 2016**
  - The **Information Technology (Data Privacy) Rules, 2011**
  - The **Indian Constitution (Articles 15, 21A, etc.)**
  - The **UN Convention on the Rights of the Child (UNCRC)**

## **12. Safeguarding Orientation and Continuous Learning**

- The CPP will be **shared, explained, and contextualized during induction** for all new colleagues—full-time, part-time, freelance, and project-based—tailored to the nature of their work, such as:
  - Filming for children's television shows
  - Delivering skill content
  - Collecting data or conducting field research
  - Designing digital learning tools
- The CPP will be **revisited quarterly** with all teams across locations to:
  - Reflect on emerging challenges
  - Review ongoing or changing risks to child safety
  - Update teams on new legal frameworks or global best practices
  - Document lived experiences and feedback for iterative improvement



- A **living document**, the CPP is designed for **dynamic application and adaptation**, ensuring it remains relevant, robust, and inclusive as programs evolve.

### **13. Comprehensive Measures to Prevent Abuse and Uphold Safeguarding at GTS**

Going to School (GTS) maintains a proactive and holistic safeguarding ecosystem that ensures the **physical, emotional, psychological, and digital safety** of every child participating in its programs. These measures are embedded in our organizational structure, onboarding systems, operational procedures, and team culture.

### **14. Induction and Continuous Training**

- **Mandatory Child Protection & Safeguarding Induction:**  
Every new colleague—whether full-time, part-time, freelance, contractual, intern, or consultant—**must undergo a three-day onboarding process**, of which one full day is dedicated to:
  - Child Protection (CP)
  - Child Safeguarding
  - Gender-based violence and harassment
  - Ethical communication and DEI principles
  - Child rights under Indian law and the UNCRC
- **Customized Training:**  
Training content is tailored to the team member's role. For example:
  - **Field teams and media creators** are trained on ethical interviewing, digital consent, supervision ratios, and filming protocols.
  - **Technology teams** are briefed on **data security**, privacy laws, and safe platform design.
  - **Education and research teams** are oriented on consent, power dynamics, trauma-informed engagement, and inclusive learning environments.
- **Quarterly Safeguarding Reviews:**  
All staff participate in **quarterly safeguarding check-ins**, where teams:
  - Reflect on emerging child protection challenges
  - Share lived experiences from the field
  - Review policy updates and evolving risks
  - Co-develop solutions for inclusive and safe programming

## **15. Signed Commitment to Safeguarding**

- All employees, consultants, and contractors **must sign the Child Protection and Safeguarding Policy** as a condition of employment or engagement.
- The CPP is **referenced in all employment contracts, partnership agreements, and scopes of work**.
- Non-compliance is treated as a serious violation with consequences ranging from warning to termination and legal reporting, as applicable.

## **16. Supervision Standards in Field & Media Settings**

To ensure the safety of children during GTS programs—especially when creating media content, conducting field activities, or facilitating peer-led sessions—the following standards are enforced:

- **No adult is ever alone with a child or group of children.** There must always be **at least two trained GTS representatives** present.
- **Children must be grouped in teams of four or more**, and programming must occur in **open, visible, and monitored settings**.
- Gender balance is required in field teams, with **at least one female adult** present during all interactions involving children of any gender.

### **Special Provisions for Media Projects (e.g., TV shows)**

- For children’s media productions, **reporter teams are inclusive and gender-balanced**, typically composed of **two girls and one boy**, accompanied by a trained media team.
- All filming and production team members:
  - Must have completed safeguarding induction and signed the CPP
  - Are subject to supervision and ethical media guidelines
  - Undergo background screening when legally required
- **Female team members must be present at all times** during filming or field visits, especially in remote or rural locations.

## **17. Child Protection Violation**

A **Child Protection Violation** under this policy refers to any action, inaction, or negligence—**intentional or otherwise**—that compromises the safety, dignity, rights, participation, or privacy of a child engaged in any Going to School (GTS) program, activity, or associated space (physical or digital).

Violations include, but are not limited to:

**1. Direct Abuse or Exploitation**

Any act of physical, emotional, psychological, sexual, institutional, or digital harm committed against a child. This includes:

- Physical violence or threats
- Emotional abuse or humiliation
- Sexual misconduct as defined under the **POCSO Act, 2012**
- Discriminatory or degrading behavior based on gender, caste, class, disability, religion, sexual orientation, or any other identity
- Inappropriate photographing or filming of children without consent

**2. Negligence or Risk-Enhancing Behavior**

Any behavior that **increases a child's vulnerability to harm**, including:

- Leaving a child unsupervised
- Failing to follow supervision protocols (e.g., being alone with a child)
- Using personal devices or communication to contact a child outside formal systems

**3. Failure to Report or Intervene**

Any failure to:

- Report suspected or known abuse or misconduct
- Escalate concerns through the established **Child Protection Committee**
- Act to remove a child from a potentially harmful situation  
Silence, delay, or willful ignorance is treated as **complicity**, and constitutes a direct violation of this policy.

**4. Breach of Safeguarding Protocols or Code of Conduct**

Ignoring, bending, or selectively applying rules set forth in:

- The **GTS Child Protection and Safeguarding Policy (CPP)**
- Safeguarding training content
- Employment contracts or partnership agreements
- Local or national child protection laws

## 6. Breach of Data Protection & Digital Safety

- Sharing children's data without consent
- Posting images or stories of children without signed permission
- Mishandling sensitive personal or digital information

All violations are considered serious and will be investigated under **due process**, with consequences ranging from warnings to termination, **FIR filing**, and legal prosecution as per the **IPC, POCSO Act**, and other applicable Indian statutes.

## 18. Components of the Child Protection and Safeguarding Policy (CPP)

The CPP is built on a **three-pronged safeguarding framework**, each supported by standard operating procedures (SOPs), detailed annexes, and mandatory compliance practices. These are:

### 1. Code of Conduct

A mandatory behavioral framework that defines:

- Acceptable and unacceptable conduct when interacting with children
- Expectations for inclusion, gender equity, consent, and confidentiality
- Supervision protocols, communication guidelines, and reporting responsibilities

Every individual within the scope of the CPP must **read, sign, and comply** with this code.**2. Whistleblower Policy (in the Context of Child Protection)**

A secure and confidential mechanism for **reporting violations, misconduct, or risks**—without fear of retaliation. It enables:

- Internal and external actors (e.g., children, families, staff, observers) to raise concerns
- Anonymous or named reporting options
- Escalation to the **Child Protection Committee**, with legal oversight

The whistleblower system ensures **accountability at all levels**, and protects those who act in good faith.

### 3. Operational Safeguarding Guidelines

A set of **practical, procedural norms** that embed safeguarding into daily operations. This includes:

- Safe recruitment practices (e.g., background checks)
- Child-friendly complaint systems
- Risk assessment tools for fieldwork and digital content
- Inclusion and accessibility standards (especially for children with disabilities)

These guidelines are **live documents**—reviewed regularly, field-tested, and updated based on team input, child feedback, and contextual learning.

## **19. Code of Conduct: Child Protection and Safeguarding**

Going to School (GTS) affirms that **every adult has a shared, non-negotiable responsibility** to uphold the safety, rights, dignity, and inclusion of every child participating in any GTS program. This **Code of Conduct** establishes clear behavioral expectations for all team members, consultants, volunteers, media crews, educators, and project partners.

It is rooted in the values of **equity, non-discrimination, consent, child participation, and trauma-informed care**, and is legally binding for all individuals engaged with GTS operations.

### **All GTS Representatives Must:**

#### **1. Respect Every Child's Dignity and Identity**

- Treat all children with respect, regardless of gender, caste, class, religion, disability, or sexual orientation.
- Use inclusive, child-friendly language and affirm children's identities, expressions, and access needs.

#### **2. Ensure Safety, Supervision & Accountability**

- Never be alone with a child. Always maintain **a minimum two-adult rule**.
- Organize child-facing programs with **groups of four or more children**, in **visible, public spaces**.
- Ensure gender representation in supervision, especially when working with girls or non-binary children.
- In exceptional cases (e.g., remote rural setups), **pause engagement until another GTS colleague joins**.

#### **3. Safeguard Child Privacy and Consent**

- Obtain **informed, written consent** from parents/guardians before photographing, filming, or interviewing a child.
- Ensure children understand and are comfortable with how their image, voice, or data will be used.
- Share only **anonymized data** internally and externally, in accordance with **India's IT Rules (2011)**.



#### 4. Respond to Child Disclosures and Needs

- Create safe spaces for children to express concerns without fear.
- Document disclosures sensitively and report them **immediately** to the Child Protection Committee.
- Offer differential support to children impacted by trauma, disability, displacement, or discrimination.

#### 5. Participate in Training & Reporting Mechanisms

- Complete mandatory CP/DEI inductions and refreshers quarterly.
- Know and use the GTS Whistleblower System and reporting tools responsibly.

#### All GTS Representatives Must Never:

##### 1. Be Alone or Isolate a Child

- Never take a child into a closed or private space without supervision.
- Never escort or transport a child alone, especially across locations.

##### 2. Engage in Inappropriate Physical or Emotional Conduct

- Never touch, hug, carry, or assist children in ways that could be perceived as intimate or unnecessary.
- Never use sarcasm, belittling language, threats, or discriminatory remarks.

##### 3. Violate Boundaries of Power and Trust

- Never engage in relationships with children that could be seen as exploitative or coercive.
- Never give personal gifts, favors, or special treatment to individual children.

##### 4. Breaches in Digital Conduct

- Never communicate directly with children via **WhatsApp, private messages, or social media** unless expressly authorized and documented.
- Immediately report any unsolicited communication from a child to the GTS leadership or Child Protection Committee.

##### 5. Discriminate or Humiliate

- Never exclude or shame a child based on their **caste, gender identity, physical appearance, language, socioeconomic background, or disability**.
- Uphold **Article 15 of the Constitution of India**, which prohibits discrimination on grounds of religion, race, caste, sex, or place of birth.



## 6. Engage in Labor or Exploitative Practices

- Never involve children in tasks unrelated to their participation in GTS programs.
- Never employ children informally or domestically.

## 7. Use or Tolerate Violence

- Never use or permit corporal punishment, under any circumstances.
- Take action if any adult inflicts harm or emotional trauma on a child in your presence.

### Field Safety in Exceptional Cases

In field scenarios—especially in rural or resource-limited areas—if a team member is temporarily alone:

- They must ensure children are **in a public, visible space** (e.g., outdoors or near a school).
- They must **pause activities** until another trained team member (preferably of the appropriate gender) arrives to jointly supervise.
- It is strongly recommended that **one male and one female** colleague are present during **co-creation, skill-building, or media production sessions** involving children.

## 20. Redressal Mechanisms

Going to School (GTS) upholds a **zero-tolerance policy** for child abuse, exploitation, discrimination, and safeguarding breaches of any kind. This section outlines the steps and structures to **report, investigate, and resolve** child protection concerns, ensuring that **every child's right to justice, safety, and recovery** is protected.

### 1. Who Can Report a Concern?

Any person—child, young person, staff member, volunteer, parent/guardian, partner, vendor, or observer—can report a violation of the Child Protection and Safeguarding Policy.

Reports can be made:

- Verbally or in writing
- Anonymously or with identification
- By phone, email, or in person



GTS encourages **every adult to act as a safeguarding advocate**, and all team members are **legally and ethically obligated** to report any suspicion or knowledge of abuse.

## 2. What Must Be Reported?

All of the following must be treated as safeguarding concerns:

- Any actual or suspected **abuse** (physical, emotional, sexual, neglect)
- Any discriminatory act based on caste, class, gender, disability, or identity
- Unsafe or exploitative digital behavior involving children
- Violation of the **Code of Conduct** or operational safeguards
- Failure to act, protect, or report by a GTS-affiliated adult

## 21. How to Report a Concern

Every person—child, colleague, volunteer, parent, or external observer—has the **right and responsibility** to report any suspicion, incident, or risk of child abuse, discrimination, or policy breach.

To uphold transparency and avoid conflicts of interest, all concerns must be reported to an **independent Child Protection Committee (CPC)**, which operates separately from executive leadership.

### Primary Reporting Channels

#### 1. Child Protection Committee (CPC) – Reporting Channels

To report a child protection concern, violation, or risk, individuals may use any of the following confidential and secure channels. Reports can be made anonymously or with identification and will be handled with strict confidentiality.

- **Email (CPC-monitored):**  
**saeguarding@goingtoschool.com**  
*This inbox is jointly managed by two trained CPC members, including an internal safeguarding officer and an external child protection expert.*
- **Confidential Safeguarding Helpline:**  
**+91 9772384800**  
*Staffed by the Designated Safeguarding Officer (DCSO), trained in child protection and trauma-informed response. Alternate line monitored by an independent safeguarding advisor.*



- **Anonymous Reporting Form:**  
[www.goingtoschool.com/safeguarding-report](http://www.goingtoschool.com/safeguarding-report)  
*An online reporting option for children, parents, team members, or external parties—available in multiple languages and with accessibility features.*
- External Safeguarding Advisor:  
safeguarding.advisor@ngo-partner.org  
*For cases requiring independent oversight, legal referral, or when a concern involves senior leadership.*

## 2. Designated Child Safeguarding Officer (DCSO)

- An internal staff member **not part of program or HR leadership** but trained in child safeguarding.
- Acts as the first point of confidential contact for children and team members in each state.

## 3. External Safeguarding Advisor

- A third-party safeguarding expert or NGO partner sits on the CPC and can be contacted independently for serious or sensitive complaints.
- Contact info: externaladvisor@ngo-partner.org

## 4. POSH Internal Committee (for cases involving sexual harassment under the POSH Act)

- In situations that qualify under the **Prevention of Sexual Harassment of Women at the Workplace Act**, reports can be made to the **Internal Complaints Committee (ICC)**, which functions under POSH guidelines and includes:
  - **A senior woman employee as Presiding Officer**
  - **At least one external POSH expert**
  - **Two other committee members from diverse roles**
  - POSH email: [poshcommittee@goingtoschool.com](mailto:poshcommittee@goingtoschool.com)

## Safeguarding Principles

- Confidentiality: All reports are handled with strict confidentiality and only shared on a need-to-know basis within the Safeguarding Team.
- Protection Against Retaliation: No reporter—especially children or junior staff—will face retaliation or penalization for speaking up.
- Mandatory Reporting: Under the POCSO Act, any adult who becomes aware of a child being harmed or at risk must report it. Failure to do so is a punishable offense.



- **Child-Friendly Options:** Child participants can use simplified language forms, voice-notes, or speak with any trained GTS team member who will then assist in filing a report safely.

#### 4. Immediate Action Upon Receiving a Report

Once a child protection concern is reported:

- The Child Protection Committee (CPC) will acknowledge the report within 24 hours, conduct a preliminary safety assessment, and activate immediate safeguarding measures.
- If a child is at immediate risk, the person involved will be immediately suspended from any role that includes contact with children or vulnerable persons, pending investigation.
- If the report concerns a criminal offense—including sexual abuse, trafficking, or grievous physical harm—GTS will:
  - **File a First Information Report (FIR)** as required under the **POCSO Act**, JJ Act, or IPC
  - **Notify appropriate child protection authorities** (e.g., Child Welfare Committee)
  - Cooperate fully with **police and legal proceedings**

#### 5. Investigation Process

The CPC will conduct a fair, confidential, and child-centered investigation. The process will:

- Be guided by **trauma-informed practices**
- Ensure that the **child is heard, protected, and supported** throughout
- Assign a neutral investigation lead (not directly involved in the program or accused person's chain of command)
- Include:
  - Interviews with the complainant (and/or child, with a trusted adult or safeguarding support person)
  - Interview with the respondent (accused)
  - Statements from witnesses
  - Collection of digital or physical evidence
  - Recommendations from **external safeguarding experts**, when needed

All records are maintained securely and confidentially, with access strictly limited to CPC members and legal advisors.

#### 6. Timeframe for Redressal

To ensure accountability and prevent delays, the following timelines apply:

Stage	Timeframe
Acknowledgement of complaint	Within 24 hours

Initial assessment and protective measures	Within 48 hours
Full investigation and fact-finding	Within 10 working days
Decision and corrective action	Within 14 working days

If the case involves criminal conduct or systemic risks, it will be immediately escalated to authorities, and the timeline will align with legal mandates under POCSO and IPC.

## 7. Outcomes and Remedial Actions

Depending on the findings, GTS will take corrective and/or disciplinary actions, including:

- Formal **written warnings**
- Termination or suspension of employment, consultancy, or volunteer position
- Debarment from future partnerships or contracts
- **Mandatory retraining or safeguarding reorientation**
- **Referral to police or child welfare authorities**
- **Psychosocial and legal support for the affected child or children**
- Public acknowledgement or apology, if appropriate and with the child/family's consent
- Policy revisions or structural changes to address root causes

Each case will be reviewed for systemic gaps in safeguarding practices, training, or partner oversight.

## 8. Protection for Whistleblowers, Children, and Witnesses

GTS enshrines the principle of non-retaliation for any person who reports a concern in good faith.

- Children are never blamed for reporting or disclosing harm.
- Whistleblowers and witnesses are protected from:
  - Termination or suspension
  - Harassment or social exclusion
  - Legal or financial consequences
- Any retaliatory action against a child, colleague, or witness will be treated as a serious safeguarding violation.
- GTS will:



- Provide **psychosocial support, legal aid, or referrals** for children who experience harm
- Ensure children feel safe to continue participating in programs and are never isolated or stigmatized
- Offer restorative, child-led processes when safe and requested by the child/family

## **22. Child Protection Committee (CPC)**

The Child Protection Committee (CPC) is the designated internal authority responsible for the prevention, monitoring, reporting, and redressal of child protection concerns across all Going to School (GTS) programs. The CPC ensures that all safeguarding practices are applied consistently, legally, and with compassion, in line with Indian law and international child rights frameworks.

### **A. Composition of the CPC**

The CPC is a multidisciplinary body composed of at least five members, with the following structure:

#### **1. Presiding Officer**

- A senior woman employee at GTS with experience in child rights, law, or protection.
- Serves as the primary liaison for all internal child protection matters.

#### **2. Two Internal Staff Members**

- Selected from different departments or program teams (e.g., education, content, operations).
- Must be trained in **DEI, disability inclusion, and trauma-informed care**.

#### **3. One Representative from the Project Location or State**

- Appointed from the region where the concern originated (e.g., Bihar, Delhi, Karnataka).
- Brings **local context, cultural sensitivity**, and language support.

#### **4. One External Expert (Safeguarding Advisor)**

- An independent safeguarding professional from a recognized child rights NGO or legal body.
- Offers neutral, third-party perspective and ensures external oversight and impartiality.

*At least 50% of committee members must be women.*



## B. Roles and Responsibilities of the CPC

### 1. Prevention & Monitoring

- Oversee the implementation of the Child Protection and Safeguarding Policy across all teams and locations.
- Coordinate quarterly reviews, trainings, and field audits.
- Identify systemic risks and update safeguards accordingly.

### 2. Reporting & Redressal

- Receive and respond to child protection complaints via email, phone, or anonymous form.
- Assign investigation leads and conduct fair, confidential inquiries.
- Recommend disciplinary or legal action as appropriate.

### 3. Child & Survivor Support

- Ensure children involved in any complaint are heard, protected, and supported.
- Refer children to psychosocial services or legal counsel, where needed.
- Ensure accommodations for children with disabilities or special needs.

### 4. Legal Compliance

- Ensure that all cases of abuse, especially those under the POCSO Act, are reported to the police and child welfare authorities.
- Maintain documentation required under the JJ Act, POSH Act, and organizational HR protocols.

### 5. Safeguarding Culture

- Promote awareness and dialogue around DEI, inclusion, safety, and consent.
- Encourage ethical, child-centered behavior in all GTS spaces.

## C. Safeguarding Across States and Field Locations

- GTS operates in diverse geographies, including urban and rural settings. To ensure contextual relevance, the CPC:
  - Nominates State-Level Focal Points or Designated Safeguarding Officers (DCSOs) in each region.
  - Ensures CPC members include representation from locations such as Bihar, Karnataka, Maharashtra, and Delhi.
  - Coordinates with local Child Welfare Committees (CWCs), NGOs, and helplines where necessary.

## D. Confidentiality, Ethics & Accountability

- The CPC is bound by the principles of:
  - Confidentiality: All cases are handled on a need-to-know basis only.
  - Due Process: All parties have the right to be heard and treated with respect.
  - Transparency: Decision-making is recorded and reviewable.
  - Non-Retaliation: Any attempt to silence or intimidate reporters will be treated as a violation.

The CPC reports quarterly to the Executive Director and annually to the Board of Trustees on trends, challenges, and improvements in child protection across the organization.

## 23. Whistleblower Policy

### Whistleblower Policy on Child Protection and Safeguarding

At *Going to School (GTS)*, we recognize that the protection of children is a shared, non-negotiable responsibility that requires transparency, integrity, and the active reporting of any behavior, environment, or policy that places a child at risk. This Whistleblower Policy exists to empower individuals to report violations or concerns without fear of retaliation, ensuring that children's safety, dignity, and rights are upheld at all times.

### 1. Purpose of the Policy

This policy is designed to:

- Encourage and protect individuals who report genuine concerns about violations of the Child Protection and Safeguarding Policy (CPP).
- Establish **clear, confidential, and independent** channels for reporting.
- Ensure that children's rights, participation, and well-being remain central to all responses.
- Protect whistleblowers from retaliation, harassment, or penalization.

### 2. Who Can Use This Policy?

Any person—within or outside the organization—can act as a whistleblower:

- GTS full-time or part-time staff
- Interns, freelancers, or volunteers
- Trustees, consultants, or vendors
- Partner organization members
- Parents, guardians, or children
- External observers, donors, or community members

### 3. What Should Be Reported?

The following concerns fall under this policy:

- Any form of child abuse: physical, emotional, sexual, or neglect
- Violation of the Code of Conduct or failure to follow supervision or safety protocols
- Discriminatory or exploitative behavior based on caste, class, gender, disability, or identity
- Failure to report abuse by colleagues or partners
- Breaches of **confidentiality, data protection**, or digital consent
- Retaliation or intimidation against a child or whistleblower
- Attempts to **cover up or obstruct** investigations

### 4. How to Report a Concern Anonymously or Confidentially

Whistleblowers may report a concern using any of the following channels:

- **Safeguarding Email (CPC-monitored):** [safeguarding@goingtoschool.com](mailto:safeguarding@goingtoschool.com)
- **Confidential Safeguarding Helpline: +91 9772384800**  
(Staffed by the Designated Safeguarding Officer, trained in child protection. Alternate line monitored by an independent third-party safeguarding advisor.)
- Online Reporting Form (Anonymous Option): [www.goingtoschool.com/safeguarding-report](http://www.goingtoschool.com/safeguarding-report)
- External Safeguarding Advisor (Independent): [safeguarding.advisor@ngo-partner.org](mailto:safeguarding.advisor@ngo-partner.org)
- **Trusted Team Member or Designated Safeguarding Officer (DCSO)**

Reports may be submitted anonymously, although sharing your name helps enable effective follow-up.

### 5. Protection for Whistleblowers

- Whistleblowers are fully protected from retaliation, regardless of whether the complaint is proven.
- No one will face dismissal, demotion, suspension, threat, or harassment for reporting a concern in good faith.
- Retaliation is considered a serious safeguarding breach and will be investigated and acted upon by the Child Protection Committee (CPC).

Knowingly making a false allegation with malicious intent may result in disciplinary action. However, honest and mistaken concerns are never penalized.

### 6. Confidentiality and Safeguarding Support

- All whistleblower identities and reports are treated with strict confidentiality.



- Whistleblowers may request **psychosocial or trauma-informed support** through GTS's trusted partners.
- Children are provided **inclusive, accessible, and child-friendly channels**, including:
  - Voice-note or verbal reporting options in local languages
  - Visual or symbol-based tools for neurodiverse or disabled children
  - In-person reporting via a trained adult safeguarding representative

## 7. Oversight and Accountability

The Child Protection Committee (CPC) oversees all whistleblower reports and ensures fair investigation. Anonymized quarterly reports on complaint trends, challenges, and actions are shared with:

- The **Executive Director**
- The **Board of Trustees**
- The **External Safeguarding Advisor**

This policy is reviewed annually and updated to reflect changes in law, field practice, and child/staff feedback.

## 24. Implementation of the Policy

The effective implementation of the Child Protection and Safeguarding Policy (CPP) at *Going to School (GTS)* requires coordinated responsibility across leadership, management, program teams, and field-level staff. The policy is not a standalone document—it is an active, evolving framework that must be practiced, monitored, and upheld daily in every space where GTS works with or on behalf of children.

### 1. Overall Responsibility

The Board of Trustees and Executive Director hold institutional responsibility for ensuring that the CPP is implemented, resourced, and enforced across all levels of the organization.

They must:

- Integrate safeguarding into **strategic planning, HR policies, and program design**
- Approve updates and ensure legal compliance (POCSO, JJ Act, RPWD Act, POSH)
- Allocate budgets for training, monitoring, and redressal systems



## 2. The Child Protection Committee (CPC)

The CPC is the core body responsible for the daily implementation, review, and enforcement of the policy. Its duties include:

- Training and onboarding all staff, volunteers, and partners
- Receiving and acting on reports of violations
- Overseeing investigations and disciplinary processes
- Reviewing risk areas and recommending improvements
- Leading quarterly and annual safeguarding audits

The CPC also ensures that implementation is inclusive, with special attention to:

- Gender equity in teams and supervision
- Children with disabilities
- Regional and rural program adaptations
- Child-friendly materials and communication

## 3. Designated Safeguarding Officers (DCSOs)

In each project state or region, a Designated Safeguarding Officer (DCSO) is appointed to:

- Serve as a first point of contact for children and colleagues in the field
- Support training, consent, and safe practice at the community level
- Escalate reports to the CPC
- Monitor compliance and conduct local safeguarding briefings

DCSOs are trained in:

- POCSO and child rights law
- Disability-inclusive safeguarding
- Digital and data safety
- Working with trauma survivors

## 4. Team Members and Associates

All GTS team members—regardless of role or seniority—are directly responsible for:

- Knowing and applying the policy in their work
- Reporting concerns or violations immediately
- Creating a safe, inclusive, and non-discriminatory environment



- Signing and adhering to the Code of Conduct
- Attending regular CP/DEI refreshers and reflective learning sessions

This also applies to:

- Contractors
- Media production teams
- Volunteers
- Partner organizations and their staff

No role or rank is exempt from responsibility.

## 5. Monitoring, Evaluation & Learning

Implementation is strengthened through:

- Quarterly reviews by the CPC and local teams
- **Annual external safeguarding audits**
- Feedback loops from children, families, partners, and team members
- Integration into program M&E (e.g., safeguarding indicators in logframes, risk registers)

The learnings inform ongoing revisions of the policy and the strengthening of safeguarding practices organization-wide.

## 24. Operational Guidelines for Implementation

These Operational Guidelines define the practical steps, procedures, and tools to implement the Child Protection and Safeguarding Policy (CPP) across all levels of *Going to School (GTS)*. They are intended to ensure that safeguarding is fully integrated into day-to-day operations, from program design to delivery, and from recruitment to monitoring.

### 1. Safe Recruitment and Contracting

- All job descriptions for staff, consultants, and partners must include a reference to GTS's CPP obligations.
- During recruitment, candidates will be assessed for their **understanding of child rights, safeguarding, and DEI principles**.
- All staff, volunteers, and contractors must:
  - Undergo background verification where legally and contextually feasible
  - Sign the **Child Protection Code of Conduct** and CPP acknowledgment form
  - Be informed that violations may result in disciplinary or legal action



## 2. Safeguarding in Program Design

- All new programs must undergo a Safeguarding Risk Assessment before launch, which includes:
  - Identifying potential risks to children in activities, settings, or partnerships
  - Outlining mitigation measures (e.g., staff ratios, gender composition, supervision)
  - Integrating child consent, digital/data protection, and accessibility for children with disabilities
- Program planning must ensure:
  - Inclusive participation (especially for girls, children with disabilities, and marginalized groups)
  - Child-friendly feedback and complaint channels
  - Visibility of safeguarding contacts in all materials

## 3. Mandatory Training and Induction

- All GTS staff and affiliates must complete:
  - A **comprehensive safeguarding induction** within 7 days of joining
  - A **DEI and disability inclusion module**
  - Quarterly refreshers on new safeguarding trends, tools, and cases
- Specialized training is required for:
  - Content and media production teams
  - Field educators and internship coordinators
  - Monitoring & Evaluation (M&E) staff collecting child-level data

## 4. Supervision and Conduct in Field Settings

- At no point may an adult be alone with a child. A minimum of two adults must supervise activities with children.
- Children must be grouped in teams of four or more, and sessions should take place in visible, open spaces.
- Mixed-gender staffing is required for supervision of mixed-gender child groups.
- Staff must never transport or host a child alone, and all movement of children (e.g., between program locations) must be documented and approved.

## 5. Consent, Identity Protection, and Content Creation

- Written informed consent must be obtained from the child and their legal guardian for:

- Participation in interviews, surveys, videos, photography, or data collection
- Sharing any content that involves children publicly
- Names, faces, and identifiable features must be:
  - Anonymized unless explicit permission is granted
  - Protected on digital platforms and in archives
- Children have the right to **refuse or withdraw consent at any time.**

## 6. Reporting and Redressal Mechanisms

- Child protection contact points (email, phone, CPC details) must be:
  - Publicly visible in all program spaces
  - Shared during sessions with children and parents
  - Available in **local languages and accessible formats**
- All team members must:
  - Know how to report a concern using official channels
  - Report within 24 hours of witnessing or hearing about a safeguarding issue
  - Cooperate fully with investigations

## 7. Monitoring, Learning, and Continuous Improvement

- Safeguarding compliance is reviewed:
  - **Quarterly by the CPC and DCSOs**
  - **Annually by an external safeguarding advisor**
- Incident reports and learnings are used to:
  - Adapt operational procedures
  - Improve staff training
  - Update the CPP and Code of Conduct

Children and families are encouraged to co-create safer spaces through:

- Anonymous feedback
- Periodic child-led assessments
- Storytelling or visual tools to identify risk and inclusion gaps



At Going to School, all complaints—whether informal or formal—are tracked using a secure internal registry. Complaints can be submitted through in-person conversations, digital forms, or partner NGO referrals. The CPC assigns a response lead within 24 hours and provides trauma-informed, multilingual support for children and families.

In the specific context of Going to School, the CPC is operationalized with internal and external representation, including program-specific Designated Safeguarding Officers (DCSOs) across regions. GTS CPCs coordinate directly with local Child Welfare Committees and law enforcement where needed. GTS ensures quarterly committee meetings, transparent documentation, and dedicated reporting channels to strengthen accountability and ensure child-centric redressal.

## Approved By:

**Name:** Hemant Khandelwal  
**Position:** Managing Trustee

**Name:** Gautam Vohra  
**Position:** Trustee

