Going to School Integrity & Whistleblower Policy
Safeguarding, Ethics, Accountability

1. Introduction

At *Going to School (GTS)*, we believe that integrity, transparency, and accountability form the foundation of our commitment to children, communities, and all stakeholders. We are an inclusive, child-centered, creative not-for-profit organization, and this policy serves as a formal mechanism to protect the rights, voices, and safety of everyone associated with our programs.

This **Integrity & Whistleblower Policy** provides a safe and structured process for reporting any form of **misconduct**, **abuse**, **fraud**, **discrimination**, or **ethical violation**, whether committed by individuals, partners, or systems operating within or on behalf of GTS.

The policy applies to **all individuals and institutions** connected to Going to School—employees, consultants, interns, vendors, trustees, program participants, and children. It is guided by the principles of **child protection, disability inclusion, gender equity, anti-discrimination, and environmental responsibility**, in line with Indian laws and international best practices.

Through this policy, we aim to foster a culture of **courageous reporting**, where all individuals feel empowered to speak up, knowing that they will be **protected, heard, and respected**.

2. Definitions

Whistleblower

Any person who reports a concern or violation under this policy in good faith. This includes staff, children, community members, vendors, or external partners.

Misconduct

Any behavior that violates GTS's code of ethics, safeguarding policy, or the law. This includes but is not limited to: child abuse, harassment, fraud, corruption, discrimination, privacy violations, or retaliation.

Child Protection Violation

Any act or failure to act that endangers the safety, dignity, development, or rights of a child. This includes abuse (physical, emotional, sexual), neglect, or failure to follow safeguarding protocols under laws like the **POCSO Act**, **JJ Act**, and the **UN Convention on the Rights of the Child**.

Safeguarding Concern

A situation where a person (especially a child or vulnerable individual) is at risk of or has experienced harm due to the actions or inactions of someone affiliated with GTS.

Fraud or Corruption

The intentional misuse of GTS funds, resources, or authority for personal or institutional gain. This includes bribery, embezzlement, falsification of records, or conflicts of interest.

Discrimination or DEI Violation

Any act that treats a person unfairly or unequally on the basis of **gender, caste, class, disability, religion, language, ethnicity, age, sexual orientation, or identity**—in violation of Article 15 of the Constitution of India and GTS's core values.

Retaliation

Any adverse action—verbal, physical, professional, or emotional—taken against a whistleblower or witness for raising a concern. Retaliation is strictly prohibited under this policy and is itself a violation.

3. Objectives of the Policy

The objectives of the **Going to School Integrity & Whistleblower Policy** are to:

1. Promote a Culture of Ethical Transparency

Foster a work and program environment where all individuals—especially children, women, people from marginalized communities, and those with disabilities—feel empowered to speak up about wrongdoing without fear, bias, or discrimination.

2. Enable Safe and Inclusive Reporting

Provide accessible, confidential, and trauma-informed reporting channels for all stakeholders, including employees, consultants, volunteers, community members, and children. Ensure that these channels are inclusive of gender identity, language, disability, and cultural context.

3. Protect the Whistleblower

Ensure robust protections against retaliation for anyone who reports a concern in good faith. This includes legal, psychological, and procedural

safeguards for whistleblowers and witnesses, especially those in vulnerable or non-leadership roles.

4. Strengthen Accountability and Redressal

Enable timely and impartial investigation of all reported concerns—be they related to child protection, fraud, misconduct, or discrimination—through a structured, fair, and confidential process led by designated internal and external safeguarding professionals.

5. Uphold Child Rights and DEI Values

Embed the values of **child protection**, **gender equity**, **disability inclusion**, and **non-discrimination** in all reporting, redressal, and decision-making processes, in line with Indian law and international rights frameworks (POCSO, JJ Act, POSH, RPWD Act, UNCRC).

6. Ensure Organizational Integrity and Legal Compliance

Maintain Going to School's integrity by ensuring that all acts of misconduct, negligence, or ethical breaches—however small—are addressed appropriately. Support compliance with national laws and funder obligations.

4. Who Can Report

This policy is applicable to **everyone connected to Going to School**—directly or indirectly—and recognizes that the **responsibility to uphold ethics, protection, and integrity is shared across all levels**.

Anyone who witnesses, experiences, suspects, or becomes aware of unethical, harmful, or unsafe behavior in the context of **GTS programs, operations, content creation, internships, or partner relationships** is encouraged—and legally or ethically obligated in certain cases—to report it.

The following individuals are entitled and encouraged to report under this policy:

Internal to GTS

- Full-time and part-time employees

- Interns, fellows, researchers, and consultants

- Volunteers and youth facilitators

- Trustees and board members

- Designated Safeguarding Officers (DCSOs)

- Members of the Child Protection Committee (CPC)

External Partners and Stakeholders

• Vendors, contractors, and service providers

• Creative collaborators (e.g., filmmakers, designers, media teams)

• Local and regional implementation partners

• Funding agencies, donors, and sponsors

• Advisors and program evaluators

Community and Program Participants

• Children participating in GTS programs (in school, in internships, co-creating content)

• Parents, guardians, and caregivers

• Teachers, school staff, and local authorities

• Community leaders and peer influencers

• Viewers, audiences, or beneficiaries of GTS-produced content

Anonymous or Third-Party Reports

GTS also accepts **anonymous reports** and reports submitted **by a witness or advocate** on behalf of another person, especially in cases involving:

Children

Persons with disabilities

Survivors of trauma or violence

Non-native speakers or individuals who need interpretation support

5. What Can Be Reported

Any action, behavior, decision, or pattern that violates **ethical conduct**, **child protection principles**, **organizational values**, or **Indian and international law** can and should be reported under this policy.

Whistleblowing may relate to both **individual misconduct** and **systemic risks**. Reports can be based on **direct experiences**, **observations**, or

reasonable suspicion. You do not need to have proof to make a report in good faith.

Below are key categories of reportable concerns:

1. Child Protection & Safeguarding Violations

• Any physical, emotional, sexual abuse or neglect of a child

• Failure to follow child protection protocols (e.g., being alone with a child, photographing without consent)

• Discrimination or exclusion of children based on caste, class, gender, disability, religion, or identity

• Violation of the **Protection of Children from Sexual Offences (POCSO) Act**, **JJ Act**, or **UNCRC principles**

• Unsafe programming environments or harmful content production involving children

2. Gender-Based and Sexual Harassment

• Any form of sexual harassment or misconduct as defined under the **POSH Act**

• Inappropriate language, touching, innuendo, or behavior

• Exploitation, coercion, or manipulation in any workplace or program context

• Harassment on the basis of gender identity or sexual orientation

3. Fraud, Financial Misuse, and Corruption

• Embezzlement or theft of organizational or donor funds

• Falsification of financial reports, budgets, or receipts

• Bribery, kickbacks, or conflict of interest in procurement or hiring

• Use of GTS resources for personal or political gain

4. Discrimination and DEI Violations

• Differential treatment or denial of opportunity based on caste, religion, class, language, ethnicity, gender, disability, age, or identity

- Hostile or exclusionary work environments

- Violation of accessibility commitments (e.g., inaccessible formats or facilities)

5. Data Privacy and Consent Violations

- Unauthorized sharing of children's images, data, or voices

- Failure to obtain written informed consent from a parent, guardian, or child

- Mishandling of personal, biometric, or confidential information in violation of the **IT Act** or GTS policy

6. Retaliation or Obstruction

- Punishment, harassment, or exclusion of a whistleblower or witness

- Attempts to suppress evidence or coerce silence

- Non-cooperation with child protection, POSH, or disciplinary investigations

7. Environmental or Ethical Breaches

- Program delivery or partner activities that harm the environment or violate sustainability norms

- Misrepresentation of program impact, media, or data in public-facing reports

Note: If you're unsure whether something qualifies, you are still encouraged to report. GTS will assess all reports in good faith and determine the appropriate response or escalation.

6. How to Report a Concern

Going to School (GTS) provides multiple safe, confidential, and inclusive channels to report any concern—whether related to child protection, misconduct, fraud, discrimination, or any other ethical or legal violation.

Reports may be made **anonymously or with your identity**, and in **local languages or accessible formats**, depending on the needs of the whistleblower (especially for children or persons with disabilities).

GTS encourages early reporting to ensure swift response and minimize risk to children, colleagues, and the organization.

Reporting Channels

You can choose from the following secure and monitored options:

1. Email

For Child Protection & Safeguarding:

safeguarding@goingtoschool.com

Monitored by the CPC, used for all concerns related to children, abuse, and protection in programs.

For Whistleblower Reporting (Non-Safeguarding Concerns):

integrity@goingtoschool.com

This inbox is managed independently of the program or safeguarding teams. It is accessible only by an independent whistleblower committee, including at least one external member, and is used exclusively for concerns involving organizational misconduct, financial fraud, discrimination, or governance failures.

Whistleblowing Reporting Channels

Whistleblowing concerns—relating to misconduct, financial irregularities, discrimination, retaliation, or ethical breaches—should be reported using one of the following secure, **independent**, and **confidential** mechanisms. These channels are **distinct from child protection or safeguarding contacts** and are monitored by a **neutral oversight body**, not by program staff.

Confidential Whistleblower Helpline

📞 **+91 00000 00001**
Available Monday to Saturday, 9:00 AM to 6:00 PM

Staffed by a designated member of the **Whistleblower Oversight Committee**, independent of GTS program and leadership teams. Escalation to an **external ethics/legal advisor** occurs automatically in high-risk or leadership-level reports.

Anonymous Ethics & Integrity Web Form

www.goingtoschool.com/integrity-report

A secure, encrypted platform for submitting anonymous reports.

- No login or email required

- Supports input in **English, Hindi.**

- Accessible for persons with disabilities (screen-reader and keyboard compatible)

3. In-Person Report to Ethics Point of Contact (EPC)

You may speak confidentially with an **Ethics Point of Contact (EPC)**, who is not part of your immediate team and is trained in non-retaliatory, trauma-informed listening.

- EPCs are appointed in each region/state (e.g., Delhi, Bihar, Karnataka)

- They will document and escalate your concern to the **Whistleblower Oversight Committee** while protecting your identity

These channels are voluntarily accessible, multilingual, and legally compliant. You do not need to prove wrongdoing—just report in good faith what you saw, experienced, or suspect.

7. What to Include in a Whistleblower Report (If Possible)

You do not need to gather proof or fully understand the legal implications to make a whistleblower report. If you suspect or have witnessed **fraud, misconduct, discrimination, harassment, abuse of power, retaliation**, or any other violation covered under this policy, you are encouraged to report it in **good faith**.

To help the Whistleblower Oversight Committee take informed and timely action, please include the following where possible:

1. Description of the Concern

- **What happened?**
  Clearly describe the incident or issue (e.g., misuse of funds, discriminatory remark, falsification of records, retaliation, workplace bullying).

- **Is it ongoing or was it a one-time incident?**

- **How did you become aware of it?**
  (Did you witness it directly, receive a disclosure, or hear about it through someone else?)

2. Context & Location

- Where did the incident take place?
  (E.g., field office, online call, team meeting, financial transaction, third-party partner setting.)

- When did it occur?
  Provide a date or approximate timeframe.

3. People Involved

- Who committed or enabled the action or violation?
  Include names, positions, or identifying details if known.

- Were others involved (e.g., as witnesses, participants, or victims)?

4. Level of Risk

- Is there an **immediate threat to someone's safety, dignity, or job security**?

- Is there a risk of **evidence being destroyed**, or others being **intimidated** into silence?

5. Supporting Information (Optional)

- Attach any relevant **emails, messages, receipts, screenshots, or notes** that help explain the issue.

- If submitting anonymously, ensure that no identifying metadata is included (the form is designed to protect your identity).

6. Your Identity (Optional but Helpful)

- You may submit your report **anonymously**, or include your name if you are comfortable.

- If you identify yourself:

  - Your identity will be treated as **strictly confidential**.

  - You may be offered **protection from retaliation**, **psychosocial support**, and **updates** on the resolution process.

If you are unsure whether what you've witnessed qualifies as a reportable concern—report it anyway. We would rather receive a report that turns out to be benign than miss one that could cause harm.

7. Confidentiality, Protection & Respect for Whistleblowers

At *Going to School (GTS)*, every whistleblower has the right to report concerns safely, without fear, and with full legal and institutional protection. This includes safeguarding their **confidentiality**, protecting them from **retaliation**, and providing **support throughout the process**.

Non-Retaliation Commitment

- No whistleblower will face **dismissal, demotion, harassment, exclusion, threats, loss of opportunities**, or any form of retaliation for reporting a concern in **good faith**.

- Any attempt to retaliate—directly or indirectly—against a whistleblower or supporting witness is a **serious violation** of this policy and will result in disciplinary or legal action, including **suspension or termination**.

- This protection also applies to those who assist whistleblowers, serve as witnesses, or cooperate in investigations.

Confidentiality Assurance

- The identity of the whistleblower will be kept **strictly confidential** and will **never be shared** with anyone not directly involved in the case management—unless:

  - The whistleblower explicitly consents to disclosure, or

  - Disclosure is required by law to protect someone from harm or to initiate legal proceedings.

- Breaches of confidentiality by any staff or committee member will result in **immediate disciplinary review**.

Support for Whistleblowers

Whistleblowers may request and receive:

- **Psychosocial support**, trauma-informed counseling, or referral to a qualified mental health provider

- **Legal aid or connection to pro bono legal services**

- Adjustments in **work assignment, schedule, location, or duties** to ensure personal safety and emotional well-being

Good Faith Reporting Protection

- You are protected even if your report is based on partial, unclear, or uncertain information.

- Whistleblowers will **never be penalized for honest mistakes**.

- Only reports found to be deliberately **false and maliciously intended** may be subject to investigation—but even then, such cases will be reviewed cautiously to avoid deterring legitimate disclosures.

8. Investigation and Response

Once a whistleblower report is received, GTS initiates a **fair, independent, and confidential investigation**, led by the **Whistleblower Oversight Committee** or a neutral external advisor, depending on the nature and severity of the concern.

Timeline for Investigation

Action Step	Timeframe
Acknowledgement of report	Within 24 hours
Preliminary risk/safety assessment	Within 48 hours
Assignment of neutral investigator	Within 3 working days
Completion of investigation	Within 10 working days
Final decision and corrective action	Within 14 working days

Criminal violations (e.g., corruption, assault, coercion) will be referred immediately to the appropriate **legal authorities**.

Investigation Process

- A **neutral investigator** is appointed—never someone in the whistleblower's reporting line.

- All interviews (whistleblower, accused, witnesses) are conducted using **trauma-informed, confidential methods**.

- Documentation is kept in a **secure, access-restricted system**.

- External advisors (legal, ethics, or safeguarding) may be consulted for complex cases.

Outcomes and Actions May Include:

- Written warning, formal reprimand, or mandatory training

- Temporary suspension or permanent dismissal

- Referral to law enforcement or anti-corruption authorities

- Structural or procedural reforms within the team or department

- Public accountability (e.g., board notice, donor disclosure)

- Restorative measures for those harmed (e.g., apology, relocation, mental health support)

9. Reporting by Children or Vulnerable Persons (in Whistleblowing Context)

GTS recognizes that **children, adolescents, persons with disabilities, and individuals from marginalized backgrounds** may face unique barriers in reporting unethical behavior or institutional misconduct.

We ensure **accessible, respectful, and inclusive** reporting pathways for them.

Child-Friendly Reporting

- Children participating in GTS programs can speak to a trusted adult (e.g., facilitator, mentor, or Designated Safeguarding Officer).

- Reports can be made verbally, visually, or through **guardian advocates**.

- Children are **never blamed, interrogated, or discredited** for raising concerns.

Accessible Formats for Vulnerable Persons

GTS accepts reports via:

- **Voice notes or audio recordings** in local languages

- **Symbol or picture-based communication**

- **Sign language** or **interpreter assistance**

- Written submissions in **plain or Easy Read** formats

Field teams are trained to identify **non-verbal signs of concern** and can initiate reports where a vulnerable person is unable to.

Advocacy by Guardians or Trusted Adults

Children and persons with disabilities may be supported throughout the process by a:

- Parent or legal guardian

- Community-based advocate

- Disability support facilitator

- Mental health or protection officer

10. Oversight, Monitoring & Learning

GTS is committed to transparency and accountability in how whistleblower reports are handled. Every concern must lead to **learning, reform, or justice**—not silence or evasion.

Oversight Bodies

- The **Whistleblower Oversight Committee** monitors all reports quarterly, ensures protection protocols are followed, and escalates unresolved concerns.

- An **External Ethics Advisor** conducts **annual audits** and may intervene in high-risk or leadership-level cases.

- Findings and progress are tracked without compromising anonymity.

Anonymized Reporting to Leadership

Quarterly summaries of whistleblower trends, actions, and reforms (with all names redacted) are submitted to:

- The **Executive Director**

- The **Board of Trustees**

- Independent auditors or donors, where contractually or ethically relevant

Feedback and Policy Learning Loop

Policy and training are continuously improved using feedback from:

- Whistleblowers and witnesses

- Staff and interns

- Children and youth councils

- Community program partners

Learnings are integrated into:

- DEI and ethics training

- Safeguarding refreshers

- Leadership appraisals

- Organizational reforms

11. Legal and Policy References

This policy complies with both **Indian law** and **international standards** to ensure legal validity, child protection, workplace equity, and organizational transparency.

Indian Legal Frameworks

- **Companies Act, 2013** – Whistleblower protections and fraud reporting

- **Prevention of Sexual Harassment (POSH) Act, 2013**

- **Prevention of Corruption Act, 1988**

- **POCSO Act, 2012** *(in cases involving minors)*

- **Rights of Persons with Disabilities (RPWD) Act, 2016**

- **IT Act, 2000** – Sensitive Personal Data & Privacy

International Standards

- **UN Convention on the Rights of the Child (UNCRC)**

- **ILO Convention 190** on workplace violence and harassment

- **OECD Anti-Bribery Framework**

- **UN Sustainable Development Goals**:
  - ◦ SDG 5: Gender Equality

  - ◦ SDG 10: Reduced Inequalities

  - ◦ SDG 16: Peace, Justice, and Strong Institutions