



# Going to School Operations Manual

May 1, 2025

*Everyone is a part of it. Creating sticky, compelling, evolving, new stories with and for young people.*

## 1. Introduction

At *Going to School (GTS)*, our operations are driven by the belief that every child has the right to learn through stories that build skills, agency, and resilience. This **Operations Manual** sets forth the essential governance framework, values, systems, and policies that support the implementation of our mission with **integrity, inclusion, transparency, and care**.

The manual provides an **overarching structure** for day-to-day operations, program delivery, internal management, compliance, safeguarding, and ethics.

## 2. Purpose of the Manual

- Define **organizational standards, protocols, and expectations**
- Ensure compliance with **Indian law, international best practices, and donor standards**
- Guide staff and partners on **how to work** at GTS
- Serve as the **entry point** to all supporting policies, SOPs, and frameworks
- Promote a **shared culture of accountability, safety, and equity**

## 3. Organizational Principles

GTS is governed by core principles that inform every aspect of our work:

- **Child-Centered & Rights-Based**
- **Equity, Diversity, and Inclusion (DEI)**
- **Transparency, Integrity, and Anti-Corruption**
- **Gender Equality and Disability Inclusion**
- **Sustainability and Climate Responsibility**
- **Community Participation and Feedback**



#### **4. Structure of the Manual**

The Operations Manual is divided into the following key domains:

<b>Section</b>	<b>Contents</b>
1. Governance & Ethics	Code of Conduct, Integrity, Whistleblower, Ethics Policy
2. Safeguarding & DEI	Child Protection, POSH, DEI, Accessibility, Data Protection
3. HR & Workplace Culture	HR Policy, Recruitment, Induction, Inclusion, Staff Well-being
4. Program Delivery & MEL	Program Implementation, M&E Policy, Community Engagement
5. Finance & Grants	Financial Procedures, Grant Expenditure, Fixed Assets, Donor Compliance
6. Procurement & Sustainability	Procurement SOP, Green Procurement Guidelines, Climate & Sustainability
7. Risk, Reporting & Oversight	Committees, Reporting Channels, Legal Compliance, Confidentiality Protocols

Each of these domains is governed by one or more detailed policies or SOPs, all of which are appended to this manual and available in digital form.

#### **5. Roles & Responsibilities**

GTS functions through well-defined structures:

- **Board of Trustees** – Strategic oversight, policy approval, compliance
- **Senior Management Team (SMT)** – Implementation leadership, staff management, fundraising
- **Committees** – Safeguarding (CPC), Ethics, POSH, Sustainability, HR & Inclusion
- **Program Teams** – Field implementation, M&E, training, partnership
- **Support Functions** – Finance, Procurement, HR, Admin, Communications

See: [GTS Committee Roles & Responsibilities Matrix]



## **6. Key Policies & Frameworks Referenced**

All policies are mandatory, reviewed annually, and updated for legal or donor compliance. Core documents include:

### **Governance & Ethics**

- Code of Conduct Policy
- Whistleblower & Integrity Policy
- Ethics & Organizational Values Charter
- Conflict of Interest Policy
- Anti-Bribery and Anti-Fraud Policies

### **Safeguarding & Inclusion**

- Child Protection & Safeguarding Policy
- POSH Policy (Sexual Harassment at Workplace)
- DEI Policy
- Accessibility & Disability Inclusion Policy
- Data Protection Policy (especially for children and communities)

### **HR & Culture**

- GTS HR Policy
- Equal Opportunity and Inclusive Hiring Guidelines
- Working Hours and Remote Work Policy
- Staff Induction and Exit Process

### **Programs & MEL**

- Program Implementation SOPs
- M&E Policy (with gender, DEI, inclusion lens)
- Feedback and Learning Systems
- Volunteer Engagement Policy

### **Finance & Grants**

- Financial Procedures Policy



- Fixed Asset Policy
- Grant Expenditure, Implementation, Closure SOPs
- Procurement Policy & Green Procurement Guidelines

### Digital & Environmental Safety

- Digital Security & Cyber Hygiene Policy
- Sustainability & Climate Action Policy
- Green Travel and Material Use Guidelines

### 7. Implementation

Each policy is implemented through:

- Mandatory **induction training**
- Quarterly **team reviews**
- Regular **internal audits** and spot checks
- **Digital document repository** with version control
- **Reporting channels** with whistleblower and grievance protection

### 8. Reporting & Grievance Mechanisms

Staff, stakeholders, and participants can report concerns via:

Email Address	Purpose
safeguarding@goingtoschool.com	Child protection & safeguarding issues
integrity@goingtoschool.com	Whistleblower concerns (ethics/fraud)
posh@goingtoschool.com	Sexual harassment complaints
hr@goingtoschool.com	Staff, hiring, contract concerns
green@goingtoschool.com	Sustainability & climate ideas/issues
feedback@goingtoschool.com	Anonymous or general stakeholder feedback



## 9. Policy Review & Update Schedule

All policies in the manual are reviewed:

- **Annually**, or earlier based on legal amendments or risk learnings
- **By designated committees** and finalized by the SMT or Board
- **With inputs from staff, children, communities, and partners**

Updated versions are published online and shared internally.

## 10. Document Control and Use

This manual is a **living document**, digitally stored and versioned. Each staff member is expected to:

- Review the manual during induction
- Refer to it in decision-making, planning, and reporting
- Contact relevant leads when unsure of a policy or process

The Going to School Operations Manual is not just a compliance tool—it is a statement of our collective responsibility to work with integrity, care, and clarity. It ensures that as we serve children and communities through education, storytelling, and social innovation, we also build systems that are worthy of trust, respect, and replication.



## Table of Contents

<b>Sr. No.</b>	<b>Particulars</b>	<b>Page No.</b>
1	Code of Conduct Policy	1
2	Integrity & Whistleblower Policy Safeguarding, Ethics, Accountability	6
3	Ethics & Values Policy	20
4	Conflict of Interest Policy	25
5	Anti-Bribery and Anti-Corruption Policy	29
6	Anti-Fraud Policy	34
7	Child Protection & Safeguarding Policy	39
8	POSH Policy - Prevention of Sexual Harassment at the Workplace	75
9	Diversity, Equity, and Inclusion (DEI) Commitments	80
10	Accessibility & Inclusion Policy	84
11	Data Protection Policy for Minors	90
12	Human Resources (HR) Policy	96
13	Monitoring & Evaluation (M&E) Policy	102
14	Volunteer Engagement Policy	106
15	Financial Procedures Policy	112
16	Fixed Asset Policy	117
17	Grant Expenditure Policy - Standard Operating Procedure (SOP)	123
18	Grant Implementation Policy	129
19	Grant Closure Policy	134
20	Procurement Policy	140
21	Digital Security Policy	145
22	Sustainability Policy	150



## Going to School Code of Conduct Policy

### 1. Introduction

At **Going to School (GTS)**, we believe that who we are is how we work. As an organization dedicated to children, storytelling, and social change, our **conduct as individuals and teams shapes our credibility, relationships, and the impact of our work.**

This Code of Conduct outlines the **ethical standards, expected behaviors, and non-negotiable boundaries** for everyone engaged with GTS—staff, consultants, partners, volunteers, interns, vendors, and collaborators.

It reflects our **organizational values**: equity, creativity, accountability, sustainability, and safeguarding.

### 2. Purpose of the Policy

- To ensure **safe, respectful, and inclusive environments** for all children, staff, and stakeholders
- To promote **professional, ethical, and legal behavior** in all aspects of our work
- To set clear expectations and processes for **addressing misconduct**
- To align with **Indian law, international best practices**, and GTS's commitments to **DEI, child rights, and climate responsibility**

### 3. Scope

This Code applies to:

- All GTS staff (full-time, part-time, freelance, interns)
- Trustees, Board members, consultants, contractors
- All implementing partners, vendors, field collaborators, content creators
- Volunteers and guest participants in GTS programs
- Any individual representing GTS, formally or informally, in-person or digitally



#### **4. Core Values & Principles**

1. **Respect and Dignity** – Treat every person, especially children, with inherent dignity
2. **Integrity** – Be truthful, transparent, and accountable in all your work
3. **Equity and Inclusion** – Actively challenge discrimination and bias based on caste, gender, disability, class, identity, religion, or age
4. **Child-Centeredness** – Prioritize child safety, voice, participation, and consent
5. **Environmental Responsibility** – Reduce waste and avoid actions that harm the climate or communities
6. **Transparency and Anti-Corruption** – Avoid conflicts of interest, gifts, bribes, and unethical financial practices
7. **Non-Violence and Non-Harassment** – Maintain safe spaces free from bullying, harassment, or abuse of any kind
8. **Confidentiality and Data Protection** – Protect private, sensitive, and child-related data at all times
9. **Digital Safety and Ethics** – Follow secure, inclusive, and respectful conduct online and in all digital work
10. **Learning and Improvement** – Own mistakes, grow from feedback, and support organizational learning

#### **5. Expected Conduct**

All individuals covered by this policy must:

- Act in a manner that enhances the trust placed in GTS by children, families, communities, donors, and the public
- Use respectful, non-discriminatory language at all times
- Treat colleagues and partners with professionalism and empathy
- Report misconduct, safeguarding concerns, or violations immediately via the appropriate channels
- Follow the policies that relate to:
  - **Child Protection and Safeguarding**
  - **DEI & Anti-Discrimination**
  - **Whistleblower Protection**



- **Procurement, Financial Ethics, and Fraud Prevention**
- **POSH and Anti-Sexual Harassment**
- **Environmental Sustainability and Green Procurement**
- **Digital Security and Data Protection**

## **6. Prohibited Conduct**

Any of the following is strictly prohibited and may result in disciplinary or legal action:

### **a. Abuse, Harassment, or Exploitation**

- Physical, emotional, sexual, or verbal abuse
- Harassment (sexual or otherwise) or bullying in any form
- Child abuse or violation of safeguarding protocols
- Retaliation against whistleblowers or those raising concerns

### **b. Discrimination or Bias**

- Casteist, ableist, racist, misogynist, homophobic, or xenophobic comments or behaviors
- Exclusion of people based on gender, identity, disability, class, or community background

### **c. Corruption and Misuse of Resources**

- Accepting or offering bribes, favors, or kickbacks
- Falsifying receipts, time sheets, or project reports
- Unauthorized use of GTS assets for personal gain

### **d. Conflict of Interest**

- Not disclosing personal, familial, or financial interest in a procurement, hire, or partnership
- Using GTS resources or position to benefit oneself or an acquaintance without disclosure

### **e. Breach of Confidentiality**

- Sharing child data, donor information, or internal materials without permission
- Discussing sensitive matters in public or unsecure settings



## **f. Irresponsible Digital or Public Behavior**

- Sharing unauthorized photos of children, internal documents, or programs on social media
- Misrepresenting GTS or using its name without consent
- Using harmful or biased language online or in media production

## **7. Special Conduct Expectations in GTS Field and Content Work**

When working directly with children or on school/field-based programs:

- **Never be alone with a child.** Always maintain team-based, visible interactions
- **Respect consent:** obtain signed permissions for interviews, videos, and appearances
- **Never give direct gifts or money** to children or families
- **Dress and behave appropriately**, reflecting the local context and program purpose
- Ensure inclusive representation of **girls, children with disabilities, and marginalized groups** in all content
- Follow protocols for **co-creating content with minors**, ensuring protection, privacy, and dignity

## **8. Reporting Violations**

- All employees and stakeholders are **required to report any violation** they witness, suspect, or experience
- Reports can be made via:
  - **Whistleblower Email:** [integrity@goingtoschool.com](mailto:integrity@goingtoschool.com)
  - **Safeguarding Email:** [safeguarding@goingtoschool.com](mailto:safeguarding@goingtoschool.com)
  - **Confidential Web Form:** [www.goingtoschool.com/report](http://www.goingtoschool.com/report)
  - Speaking to a trained DCSO (Designated Child Safeguarding Officer)

GTS guarantees **non-retaliation** and protection of confidentiality for anyone reporting in good faith.



## **9. Investigation and Consequences**

- All reports are investigated by GTS's **Ethics & Safeguarding Committee**
- Investigations are:
  - Timely, confidential, and trauma-informed
  - Include interviews, document review, and legal consultation if needed
- **Consequences** may include:
  - Warning, training, or mediation
  - Suspension, termination, or legal escalation
  - Organizational changes or public acknowledgments

## **10. Acknowledgment and Implementation**

- All staff, consultants, partners, and vendors **must sign** this Code of Conduct upon joining or contracting with GTS
- Induction sessions, trainings, and reviews will:
  - Reinforce conduct expectations
  - Integrate DEI, Safeguarding, POSH, and Digital Safety content
- The policy is part of:
  - Employment and consultancy agreements
  - Vendor onboarding
  - Program partnership MoUs

## **11. Policy Review**

This policy is reviewed **annually**, or upon:

- Major legal or donor compliance changes
- Institutional safeguarding updates
- Lessons learned from investigations or audits

All updates are communicated to teams, vendors, and collaborators.

**Going to School is committed to creating a safe, inclusive, and respectful culture for everyone—especially children. This Code of Conduct helps ensure that we live our values in all interactions, at all times.**

**By signing and following this Code, each person becomes a guardian of our mission and community.**



## 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](mailto: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](mailto: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**

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](http://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



## Going to School Ethics & Values Policy

### **Our Integrity Charter and Organizational Ethics & Integrity Framework**

*Accountability. Inclusion. Courage. Honesty. Respect.*

#### **1. Introduction**

At *Going to School (GTS)*, ethics are not just about avoiding wrongdoing—they are the foundation of **how we work, why we work, and the world we are helping to build.**

This **Ethics & Values Policy** sets out GTS's commitment to upholding a culture of **integrity, respect, fairness, and courage** across all levels of the organization. It defines how every person connected to GTS—from a child in a classroom to a board member in a meeting room—should be treated and how decisions should be made when no one is watching.

We recognize that as a child- and community-centered organization, the stakes of our behavior and decision-making are **deeply human**. Our ethics directly shape **how children learn, how stories are told, how funds are used, and how inclusion is built.**

#### **2. Purpose of the Policy**

- To establish the **core values** and **ethical principles** that guide GTS's work, culture, and decision-making.
- To build a **shared language of integrity**, applicable to all programs, partnerships, and leadership levels.
- To serve as a **compass** when navigating ethical dilemmas or grey areas in the field, in relationships, or in strategy.
- To foster **collective responsibility**, where every team member is accountable for upholding the dignity, rights, and trust of those we serve.

#### **3. Who This Policy Is For**

This policy applies to:

- All **GTS employees**: full-time, part-time, contractual, probationary
- **Interns, volunteers, and freelancers**
- **Board members, trustees, and advisors**
- **Vendors, service providers, and consultants**



- **Partner organizations** and their teams
- **Children, youth, families, and community representatives** involved in GTS programs

Every individual associated with GTS is expected to **read, understand, and embody** the Ethics & Values Policy.

## **4. Core Values and Ethical Principles**

### **4.1 Integrity**

We tell the truth, follow through on our commitments, and act in a way that is consistent—across locations, power dynamics, and stakeholders. Integrity means making decisions based on principle, not convenience or image.

### **4.2 Respect for Dignity and Rights**

Every person—especially children, persons with disabilities, and those from marginalized communities—deserves respect, safety, and a voice. This includes respect for cultural differences, gender identities, privacy, and consent.

### **4.3 Justice and Equity**

We acknowledge that systems are unequal—and we take steps to redistribute voice, access, and resources fairly. We challenge casteism, patriarchy, ableism, and other forms of structural injustice in our practices and partnerships.

### **4.4 Transparency**

We are open about our processes, decisions, and use of funds. We communicate clearly and honestly with our team, our community partners, and our donors.

### **4.5 Accountability**

We own our mistakes, share power, and welcome feedback. We create systems where wrongdoing can be reported without fear, and we hold ourselves and others accountable through action.

### **4.6 Courage and Ethical Leadership**

We speak up when something is wrong—even if it is difficult, uncomfortable, or unpopular. We protect those who raise concerns and model ethics from the top.

## **5. Integrity & Ethics Charter**

This Charter is GTS's public declaration of the **ethical standards we uphold**. All members of the GTS community are expected to:



- Always act in the **best interest of children and communities**
- Be **honest and lawful** in financial, programmatic, and interpersonal dealings
- Refuse to offer or accept bribes, favors, or manipulation in any form
- Call out disrespect, discrimination, or abuse of power
- Avoid personal gain from organizational resources or influence
- **Disclose conflicts of interest** openly and act to resolve them transparently
- Maintain confidentiality where required, but never to cover up harm

## 6. Organizational Ethics & Integrity Framework

This framework operationalizes the Ethics Charter across GTS functions:

Area	Ethical Expectation	Implementation Mechanism
<b>Leadership &amp; Governance</b>	Ethical tone from the top	Annual ethics affirmations by board; ethics briefing for trustees
<b>Program Delivery</b>	Child-centric, inclusive, equitable	Child Safeguarding, DEI, Accessibility, and POSH policies
<b>Finance &amp; Procurement</b>	No fraud, favoritism, or misuse	Dual-signature protocols; vendor due diligence; transparent audits
<b>Hiring &amp; HR</b>	Merit-based, inclusive, safe	Bias-aware recruitment, DEI metrics, POSH compliance
<b>Storytelling &amp; Media</b>	Dignity, consent, truth	Ethical storytelling policy; inclusive representation standards
<b>Fieldwork &amp; Community Engagement</b>	Cultural humility, co-creation, safety	Training in ethical facilitation; feedback loops with communities
<b>Digital &amp; Data</b>	Privacy, consent, minimalism	Data Protection for Minors policy; informed digital use guidelines

## 7. Implementation of the Policy

### 7.1 Training and Orientation

- Mandatory induction session on ethics and values for all new staff and interns
- Annual refresher workshops for all departments
- Inclusion of this policy in all vendor and partner agreements

### 7.2 Ethics Point of Contact



- GTS appoints an **Ethics Focal Person** and forms an **Ethics & Integrity Review Panel**
- This body advises on dilemmas, investigates misconduct, and tracks learning

### **7.3 Ethics in Action Sessions**

- Quarterly internal learning spaces where teams reflect on ethical dilemmas in fieldwork, partnerships, or storytelling

### **7.4 Safe Reporting Mechanisms**

- All stakeholders may report violations through:
  - **integrity@goingtoschool.com**
  - **Anonymous online form**
  - In-person dialogue with an Ethics Focal Person

## **8. Accountability and Consequences**

Breaches of this policy—whether related to abuse of power, misuse of funds, or unethical conduct—will be addressed through:

- Formal warning, suspension, or dismissal
- Contract cancellation (in the case of vendors/partners)
- Referral to law enforcement or regulatory bodies
- Organizational apology and systems correction

Every complaint or breach will be handled **confidentially, fairly, and with protection for whistleblowers.**

## **9. Integration with Other Policies**

This policy is a cornerstone document and complements:

- Child Protection & Safeguarding Policy
- DEI Commitments
- Whistleblower Policy
- POSH Policy
- Anti-Bribery and Anti-Fraud Policies



- Code of Conduct
- Data Protection Policy

## **10. Review and Evolution**

This policy is reviewed:

- **Annually** by the Ethics Panel and Board
- After any significant incident, audit finding, or legal change
- Through regular input from staff, children, community partners, and auditors

Ethics is a living commitment. This policy will evolve with feedback, reflection, and the ethical growth of our work.



## Going to School Conflict of Interest Policy

Ensuring Ethical, Transparent, and Impartial Decision-Making at Going to School

### 1. Introduction

At **Going to School (GTS)**, we are committed to operating with the highest standards of **integrity, impartiality, and ethical governance**. This Conflict of Interest Policy is designed to protect the credibility and effectiveness of our work by ensuring that **all decisions are made solely in the best interests of the organization, children, communities, and stakeholders we serve**.

A conflict of interest—real, perceived, or potential—can undermine trust, distort accountability, and compromise impact. This policy provides **clear guidelines** to identify, disclose, manage, and resolve conflicts, enabling GTS to maintain a transparent and principled organizational culture.

### 2. Purpose

The purpose of this policy is to:

- Define what constitutes a **conflict of interest** in the context of GTS's work
- Promote **full transparency and disclosure** of any personal or professional interests that may interfere with impartial decision-making
- Provide procedures for **declaring, reviewing, and managing conflicts**
- Foster **public and internal trust** in GTS's ethical integrity, particularly in decisions that involve funding, procurement, partnerships, and hiring

### 3. Scope and Applicability

This policy applies to all individuals involved with GTS, including:

- Board members and trustees
- Executive leadership and senior management
- Full-time, part-time, and contract employees
- Interns, consultants, fellows, and volunteers
- Vendors, suppliers, and project partners
- Anyone involved in procurement, hiring, decision-making, or access to confidential or financial information



#### **4. What is a Conflict of Interest?**

A **conflict of interest** occurs when a person's personal, financial, or professional interests (or those of a close relation) **may interfere with their ability to act in the best interests of GTS.**

**Common types of conflicts include:**

- **Financial interest:** A team member stands to gain financially from a decision they influence (e.g., awarding a contract to a relative's business)
- **Familial or personal relationships:** Involvement in hiring, supervising, or evaluating someone with whom they have a close personal relationship
- **Board overlap:** Serving on a board or advisory role of another organization that receives funding from or competes with GTS
- **Gifts or favors:** Receiving gifts, hospitality, or special treatment that could influence judgment or loyalty
- **Dual employment:** Being employed or consulting for another organization whose interests conflict with those of GTS

Conflicts can be:

- **Actual:** A conflict exists now
- **Potential:** A conflict may arise in the future
- **Perceived:** A third party might believe a conflict exists, even if none exists in reality

#### **5. Duty to Disclose**

All covered individuals must:

- **Proactively disclose any actual, potential, or perceived conflicts** to their manager, HR, or the Ethics Committee
- Fill and update a **Conflict of Interest Disclosure Form** annually and upon any change in circumstance
- Recuse themselves from decisions, meetings, or reviews where their impartiality may be compromised

Disclosure must occur **before a decision is made**, not after.

#### **6. Procedures for Managing Conflicts**

Once a conflict is disclosed:



1. The issue is referred to the **GTS Ethics & Integrity Committee**
2. The Committee conducts a **review** to assess the severity, impact, and management options
3. Possible actions include:
  - Recusal from the decision or project
  - Transfer of responsibility to another team member
  - Termination of the external relationship (if high-risk)
  - Full documentation of the case in the **Conflict of Interest Register**
4. The outcome is communicated to all relevant parties and filed for audit/review

### **7. Confidentiality and Non-Retaliation**

- All disclosures are handled with **confidentiality and discretion**
- No individual will face retaliation for reporting a conflict in **good faith**
- **Whistleblower protections** apply to those who report undisclosed conflicts or ethical violations related to this policy

### **8. Examples of Conflict Scenarios**

<b>Scenario</b>	<b>Is it a Conflict?</b>	<b>Action Required</b>
An employee's spouse runs a printing firm bidding for a GTS contract	Yes – financial and personal	Must disclose; employee recuses from vendor selection
A program manager is asked to serve on a donor's advisory board	Potential – depends on duties	Must disclose and seek committee clearance
A team member accepts expensive gifts from a partner organization	Yes – perceived influence	Must report immediately and return gift
An intern volunteers for another NGO in the same community	Possibly – if missions overlap	Must disclose to avoid role confusion or resource conflict

### **9. Training and Awareness**

- All new employees and board members are trained on this policy during induction
- Annual refresher training and re-signing of the **Ethics and Conflict of Interest Declaration** is required
- GTS leadership is responsible for modeling transparency and disclosure in decision-making



## **10. Record-Keeping and Oversight**

- GTS maintains a **Conflict of Interest Register**, updated quarterly and reviewed by the **Board of Trustees**
- All actions taken are **documented and stored securely**
- An annual Conflict of Interest audit is conducted alongside ethics and governance reviews

## **11. Disciplinary Action for Non-Compliance**

Failure to disclose a conflict of interest, or acting in self-interest, may result in:

- Formal warning or censure
- Removal from decision-making responsibilities
- Suspension or termination of employment/contract
- Referral to legal or regulatory authorities if financial fraud is involved

## **12. Review and Policy Evolution**

This policy will be reviewed every **24 months**, or sooner if:

- There is a significant change in legal standards, funding terms, or organizational governance
- New ethical risks emerge
- The Ethics Committee identifies the need for updates based on internal reviews

## **13. Integration with Other Policies**

This policy works in conjunction with:

- **Ethics & Integrity Policy**
- **Whistleblower Policy**
- **Procurement and Financial Policies**
- **Code of Conduct**
- **Child Protection and Safeguarding Policy**

Transparency is not optional—it is foundational. At GTS, we believe that managing conflicts of interest **honestly, proactively, and accountably** allows us to make decisions that reflect the dignity, fairness, and mission-centered values we seek to uphold.



## Going to School Anti-Bribery and Anti-Corruption Policy

*Integrity in Action | Zero Tolerance | Ethical Leadership*

### 1. Introduction

At **Going to School (GTS)**, we believe that our mission—to educate, empower, and inspire children and communities—is only as strong as our commitment to **transparency, accountability, and ethical practice**.

We uphold a strict **zero-tolerance policy** toward all forms of bribery, corruption, facilitation payments, unethical influence, and misuse of power or funds. This policy establishes clear standards for behavior and decision-making for everyone involved in GTS operations, programs, partnerships, procurement, and fundraising.

Bribery and corruption not only **violate the law**, but **erode trust, undermine equity**, and **expose children and communities to exploitation**.

### 2. Purpose

This policy is designed to:

- Prevent and detect bribery, corruption, fraud, and financial misconduct at all levels of the organization.
- Establish transparent and accountable procedures for handling funds, contracts, partnerships, and donor relationships.
- Ensure that GTS complies with **Indian legal standards, donor codes of conduct**, and **international anti-bribery conventions**.
- Empower all employees, partners, and stakeholders to act with **integrity** and to report wrongdoing safely.

### 3. Legal and Ethical Framework

This policy aligns with the following:

#### Indian Legal Requirements:

- **Prevention of Corruption Act, 1988** (as amended by the Prevention of Corruption (Amendment) Act, 2018)
- **Companies Act, 2013** – Sections on fraud reporting and whistleblowing
- **Foreign Contribution Regulation Act (FCRA), 2010**
- **Indian Penal Code** – Sections related to criminal misconduct



## International Guidelines:

- **UN Convention Against Corruption (UNCAC)**
- **OECD Anti-Bribery Convention**
- **UK Bribery Act, 2010** (*for international partners*)
- **US Foreign Corrupt Practices Act (FCPA), 1977**

## 4. Scope of Application

This policy applies to all individuals associated with GTS, including:

- Full-time and part-time employees
- Interns, volunteers, and consultants
- Trustees and board members
- Vendors, suppliers, and service providers
- Partner organizations and subgrantees
- Government liaisons and donor representatives

This policy applies to **all contexts**, including procurement, hiring, travel, licensing, field operations, storytelling, fundraising, and grant reporting.

## 5. Definitions

**Bribery:** Offering, giving, receiving, or soliciting anything of value (e.g., money, gifts, favors, influence) to improperly influence the actions of another party.

**Corruption:** Abuse of entrusted power for private gain—including nepotism, embezzlement, kickbacks, and preferential treatment.

**Facilitation Payment:** Small payments made to expedite or secure routine government actions—prohibited under this policy.

**Conflict of Interest:** A situation where personal interests could improperly influence professional judgment or duties.

**Kickback:** A secret commission paid to someone in return for making a favorable decision.

**Gratification:** Any form of benefit, monetary or otherwise, provided with an expectation of return favor.



## 6. Prohibited Acts

GTS prohibits all employees, contractors, or representatives from:

- Offering, requesting, or accepting bribes in any form
- Making facilitation payments to speed up approvals or logistics
- Providing lavish gifts or entertainment to government officials or donors
- Engaging in quid pro quo arrangements (e.g., internships for favors)
- Awarding contracts to suppliers in exchange for personal benefit
- Concealing financial transactions or falsifying documentation
- Using GTS's name, position, or resources for personal gain
- Accepting kickbacks, rebates, or commissions beyond salary/invoice

## 7. Gifts and Hospitality Policy

- Gifts valued above ₹1,000 must be **declared in writing** and logged with the **Integrity Committee**.
- GTS employees may **not give gifts, offer meals, or reimburse expenses** that could be interpreted as bribes—especially to government officials or public servants.
- Modest cultural or seasonal gifts may be permitted **with prior written approval**.
- All hospitality must be **transparent, pre-approved, and documented**.

## 8. Third Parties and Due Diligence

- GTS conducts **due diligence checks** on vendors, contractors, and partners before engaging in agreements.
- All third parties must sign a **Declaration of Integrity and Compliance**.
- Contracts must contain **anti-bribery clauses**, and include clear consequences for violations.
- Third parties are held to the same standards and reporting responsibilities as GTS personnel.



## 9. Financial Controls

- Dual signatory requirements for all expenditures above ₹10,000.
- Program budgets and procurement undergo **quarterly audits**.
- All receipts, reimbursements, and contracts are **digitally logged and reviewed**.
- No cash payments over ₹5,000 without prior written exception from the Finance Director.

## 10. Training and Awareness

- All staff receive mandatory **annual training** on anti-bribery laws, scenarios, and reporting protocols.
- New staff are inducted on this policy during onboarding.
- Field teams are trained to identify subtle forms of corruption, including gendered coercion, caste-based favoritism, and informal gatekeeping.
- GTS conducts **integrity drills and simulations** in high-risk departments (e.g., procurement, field research, licensing).

## 11. Reporting Mechanisms

Any suspected bribery, fraud, or ethical misconduct must be reported through:

- **integrity@goingtoschool.com** (Confidential Whistleblower Channel)
- **www.goingtoschool.com/report** (Anonymous Web Form)
- Internal escalation to the Integrity Oversight Committee

Whistleblowers are protected under the **Whistleblower Protection Clause**. Retaliation is strictly prohibited and punishable under policy.

## 12. Investigation and Response

- Reports are acknowledged within 48 hours and assigned to a neutral investigator.
- Investigations are **confidential, impartial, and trauma-informed**.
- Outcomes may include:
  - Verbal or written warnings



- Suspension or dismissal
- Termination of vendor contracts
- Disclosure to law enforcement or regulatory bodies

The Integrity Committee provides quarterly reports to the **Board of Trustees**.

### **13. Oversight and Compliance**

- The **Integrity Oversight Committee (IOC)**, consisting of senior leadership and one external legal or ethics advisor, oversees this policy.
- An **annual external audit** of financial practices and vendor relationships is conducted.
- Internal compliance dashboards track training, disclosures, and red flags.

### **14. Integration with Other Policies**

This policy works in conjunction with:

- GTS Whistleblower & Integrity Policy
- GTS Financial Procedures Manual
- GTS Procurement Guidelines
- GTS Child Protection & Safeguarding Policy
- DEI and Code of Conduct Framework

### **15. Review and Amendment**

This policy is reviewed **annually** and updated to reflect:

- Changes in legal and regulatory requirements
- New funding sources or operational geographies
- Feedback from stakeholders and whistleblowers
- Insights from internal and external audits



## **Going to School Anti-Fraud Policy**

*Transparency | Accountability | Zero Tolerance for Fraud*

### **1. Introduction**

At **Going to School (GTS)**, we uphold the highest standards of **ethical behavior, financial transparency, and institutional integrity**. Fraud undermines not only our credibility and effectiveness, but also violates the trust placed in us by the children, youth, communities, donors, and partners we serve.

GTS adopts a **zero-tolerance approach** to all forms of fraud—whether committed by employees, vendors, beneficiaries, or third parties. This policy outlines how we **prevent, detect, investigate, and respond to fraud**, ensuring that every rupee entrusted to us is used with integrity and for its intended purpose.

### **2. Purpose**

This policy aims to:

- Define what constitutes fraud within GTS operations and programs
- Promote a culture of honesty, risk awareness, and whistleblower safety
- Establish a framework for reporting, investigation, and disciplinary response
- Safeguard the assets, resources, and reputation of the organization
- Comply with Indian laws and donor contractual obligations

### **3. Scope of Application**

This policy applies to:

- All GTS employees (full-time, part-time, contract)
- Interns, volunteers, consultants, trustees, and board members
- Vendors, suppliers, service providers
- Partner organizations, subcontractors, and field collaborators
- Any individual or entity involved in GTS-funded or affiliated activities

The policy covers both **financial and non-financial fraud** across **headquarters, field sites, media projects, research, education programs, and digital platforms**.



#### **4. Definitions of Fraud**

Fraud is defined as any intentional act of **deception, misappropriation, or abuse of trust** designed to secure an unfair or unlawful gain, cause loss, or conceal wrongdoing.

Types of fraud include but are not limited to:

- **Financial Fraud:** Embezzlement, forged invoices, inflated procurement, unauthorized use of funds
- **Payroll Fraud:** Ghost employees, falsified attendance records, manipulation of salaries or benefits
- **Expense Fraud:** False reimbursement claims, altered bills, personal expenses submitted as official
- **Procurement Fraud:** Bid rigging, kickbacks, collusion with suppliers
- **Conflict of Interest:** Awarding contracts or employment based on personal relationships
- **Beneficiary Fraud:** Misreporting program data, falsifying impact numbers, registering fictitious participants
- **Forgery and Falsification:** Altering documents, backdating agreements, tampering with records
- **Asset Misuse:** Theft or unauthorized use of GTS equipment, vehicles, or intellectual property

#### **5. Prevention Strategies**

GTS employs multiple strategies to proactively prevent fraud:

##### **Financial Controls**

- Segregation of duties in approval, disbursement, and accounting
- Dual signatories for payments above ₹10,000
- Mandatory documentation for all expenditures
- Regular internal audits and external financial reviews

##### **Procurement Safeguards**

- Competitive bidding and vendor vetting
- Transparency in evaluation and selection processes



- Conflict-of-interest disclosures required at contract stage

### **Human Resource Protocols**

- Background checks and reference verification
- Signed Code of Conduct and Anti-Fraud Declaration for all hires
- Induction training on financial ethics and fraud risks

### **Digital and Field Oversight**

- Encrypted digital accounting systems with access logs
- GPS-tracking on field visits and verification protocols for research
- Randomized audits of program data and delivery quality

## **6. Reporting Fraud**

GTS encourages all stakeholders to **speak up against fraud** through safe and confidential channels.

### **You can report fraud via:**

- **Email:** [integrity@goingtoschool.com](mailto:integrity@goingtoschool.com)
- **Web:** [www.goingtoschool.com/report](http://www.goingtoschool.com/report) (anonymous option available)
- **In-person:** Any trusted supervisor, committee member, or safeguarding officer

Reports can be anonymous. All whistleblowers are protected under GTS's **Whistleblower & Integrity Policy**.

## **7. Investigation Process**

Once a report is received:

1. **Acknowledgement** within 48 hours
2. **Preliminary risk assessment** within 5 working days
3. **Full investigation** by a neutral investigator or audit team
4. **Confidential interviews** with witnesses, whistleblower (if known), and alleged individual
5. **Collection and review of documentary evidence**



All investigations are conducted with **confidentiality, fairness, and due process**. False allegations made with malicious intent will be subject to review.

## **8. Response and Sanctions**

If fraud is substantiated, the following may occur:

- Recovery of funds or assets
- Termination of employment or contract
- Criminal complaint filed with appropriate legal authorities
- Disclosure to donors or government bodies
- Blacklisting of vendor or partner
- Public clarification or legal disclaimer (in high-impact cases)

All sanctions are applied proportionately and in accordance with **Indian law and contractual terms**.

## **9. Roles and Responsibilities**

### **All Employees & Partners Must:**

- Read and sign the Anti-Fraud Policy
- Report any suspected fraud immediately
- Cooperate with investigations in good faith

### **Program & Finance Teams Must:**

- Maintain transparent records and documentation
- Monitor fund usage and asset deployment
- Flag discrepancies early and take preventive steps

### **Integrity Oversight Committee (IOC):**

- Monitor policy compliance
- Oversee investigations
- Submit quarterly reports to the Board



## **10. Learning and Risk Mitigation**

- Post-incident reviews will be conducted to identify root causes
- Findings will inform **training, policy updates, and control strengthening**
- Fraud risk assessments will be part of program and country strategy planning

## **11. Integration with Other Policies**

This policy complements and reinforces:

- **GTS Financial Policy Manual**
- **Procurement Policy**
- **Whistleblower Policy**
- **Child Safeguarding & Protection Policy**
- **Anti-Bribery & Corruption Policy**
- **Code of Conduct**

## **12. Review and Updates**

This policy will be:

- Reviewed **annually** or following any serious incident
- Updated in line with legal changes, audit recommendations, or donor requirements
- Shared with all staff and re-acknowledged through **yearly ethics reaffirmation**

## **13. Zero Tolerance Declaration**

GTS commits to **zero tolerance for fraud**. No staff member, regardless of seniority or contribution, is exempt. We stand for **honest work, transparent systems, and ethical stewardship** of every resource we are entrusted with.



## 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):**  
**[safeguarding@goingtoschool.com](mailto:safeguarding@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**  
*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](mailto: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](mailto: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 <b>24 hours</b>
Initial assessment and protective measures	Within <b>48 hours</b>
Full investigation and fact-finding	Within <b>10 working days</b>
Decision and corrective action	Within <b>14 working days</b>

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 00000 00000  
(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.



## Going to School POSH Policy

### Prevention of Sexual Harassment at the Workplace

*Commitment to Gender Equity, Dignity, and Safe Work Environments*

#### **1. Introduction**

Going to School (GTS) is committed to creating a workplace and program environment that is safe, inclusive, respectful, and free from all forms of sexual harassment. This policy is grounded in the **Prevention of Sexual Harassment of Women at the Workplace (POSH) Act, 2013**, and aligns with GTS's broader safeguarding, DEI, and integrity frameworks.

Sexual harassment is a form of gender-based violence and a violation of fundamental human rights. It undermines safety, dignity, productivity, and well-being—especially for women, trans and non-binary persons, and those from historically marginalized communities.

This policy aims to prevent, prohibit, and redress sexual harassment in all its forms—whether physical, verbal, virtual, implied, or systemic—and applies across all locations and levels of the organization, including field sites, media production spaces, digital platforms, and community interfaces.

#### **2. Definitions**

##### **Sexual Harassment (as per POSH Act):**

Includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- Physical contact and advances
- Demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

##### **Workplace (Expanded Definition):**

Includes not only the formal office environment but also:

- Field locations (schools, communities, research sites)



- Media production environments (sets, editing rooms)
- Virtual/online meetings, chats, emails
- Travel associated with work
- Residences used for work-related purposes

**Aggrieved Person:**

Any employee, intern, volunteer, or third party associated with GTS—regardless of gender or hierarchy—who alleges harassment.

**Respondent:**

The individual accused of sexual harassment.

**3. Scope of Application**

This policy applies to all persons engaged by GTS in any capacity, including:

- Full-time, part-time, and contract staff
- Freelancers, interns, and volunteers
- Trustees and board members
- Consultants, advisors, and vendors
- Project partners, collaborators, and sponsors
- Children (in special cases where the POSH Act and POCSO may overlap)

**4. Guiding Principles**

- **Zero Tolerance:** GTS maintains a strict zero-tolerance policy for all forms of sexual harassment.
- **Gender Justice:** GTS affirms and upholds gender equity and bodily autonomy for all.
- **Intersectionality:** GTS acknowledges that vulnerability is shaped by caste, class, disability, and gender identity.
- **Trauma-Informed:** All redressal procedures will be survivor-centered, respectful, and sensitive.



- **Confidentiality & Due Process:** All reports are handled with utmost confidentiality and fairness for both parties.

## **5. Internal Committee (IC)**

As mandated by the POSH Act, GTS has constituted an **Internal Complaints Committee (ICC)** to address complaints under this policy.

### **Composition:**

- **Presiding Officer:** A senior woman employee
- **At least 2 Members:** With understanding of gender issues and the law
- **External Member:** An NGO/legal expert with experience in POSH, DEI, and survivor advocacy
- **At least 50% of the IC must be women**

### **Mandate of the IC:**

- Receive, acknowledge, and investigate complaints of sexual harassment
- Provide interim protection if needed (e.g., change of workplace)
- Recommend disciplinary actions and systemic reforms
- Submit annual reports to the management, as required under law

## **6. How to File a Complaint**

### **Reporting Channels:**

- **Email:** [poshcommittee@goingtoschool.com](mailto:poshcommittee@goingtoschool.com)
- **In-Person:** Any member of the ICC
- **Digital POSH Complaint Form:** Available at [www.goingtoschool.com/posh-report](http://www.goingtoschool.com/posh-report)

Complaints must be made within **3 months** of the incident. In special cases (e.g., trauma, disability), this can be extended by the IC.



### **What to Include:**

- Details of the incident(s)
- Dates, location, witnesses (if any)
- Evidence, messages, or emails (if available)

Anonymous complaints are permitted but may limit the IC's ability to investigate.

### **7. Redressal Process**

#### **Timelines (as per POSH Law):**

- **Acknowledgement:** Within 7 days
- **Preliminary Hearing:** Within 10 days
- **Full Investigation:** Completed within 90 days
- **Final Action:** Recommendations implemented within 10 days of report submission

#### **Possible Outcomes:**

- Apology, warning, or mandatory training
- Change in role or location
- Suspension or termination
- Filing of police complaint (if criminal in nature)

### **8. Protection Against Retaliation**

Whistleblowers, complainants, and witnesses are fully protected. Any form of retaliation—intimidation, demotion, exclusion—will be treated as a separate offense.

### **9. Support for Survivors**

GTS offers:

- Psychological counseling or trauma support
- Legal aid via partner NGOs or pro bono networks
- Flexible work arrangements or paid leave
- Disability and language accommodations

### **10. Awareness, Training, and Prevention**

- **Mandatory POSH Orientation** for all employees and associates
- **Annual Refresher Workshops** across departments and field teams
- **Visual Materials and Helpline Visibility** in all locations



- **Inclusive Curriculum** for content creators and school-based programs

### **11. Linkages to Other Policies**

This policy complements and is integrated with:

- GTS Child Protection & Safeguarding Policy
- GTS Integrity & Whistleblower Policy
- GTS DEI Commitments
- Code of Conduct for all employees and partners

### **12. Legal & International References**

#### **India:**

- POSH Act, 2013
- IPC Sections 354 (sexual assault), 509 (outraging modesty)
- RPWD Act, 2016
- Companies Act, 2013

#### **International:**

- UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- ILO Convention 190 on Workplace Violence
- UN SDG 5 (Gender Equality)

### **13. Monitoring & Compliance**

- The ICC will submit an **Annual POSH Compliance Report**
- Anonymous **feedback loops** and **safety audits** will inform updates
- Oversight by the **Board and Executive Director** ensures accountability



## Going ToSchool Diversity, Equity, and Inclusion (DEI) Commitments

*Building a Just, Inclusive, and Representative Organization*

### 1.1 Our Commitment to DEI

At *Going to School (GTS)*, we believe that **diversity, equity, and inclusion** are not standalone themes or aspirational values—they are **foundational, non-negotiable principles** that shape how we build teams, design programs, tell stories, and co-create with children, youth, and communities across India.

We recognize that systems of **caste, gender, class, ability, language, religion, and geographic marginalization** have historically shaped access to education, resources, and opportunity. As an organization that works in schools, in communities, and on-screen, we understand our power and responsibility in either reinforcing or challenging those systems.

Our DEI approach is grounded in **intersectionality, accountability, and action**, ensuring that inclusion is practiced not only in policy, but in daily behavior, institutional design, and long-term strategy.

### 1.2 Principles of DEI at GTS

- **Dignity for All:** Every person—child, adult, partner, or team member—deserves respect, care, and equitable opportunity, irrespective of their caste, class, gender identity, sexuality, religion, language, region, disability, or educational background.
- **Inclusion is Intentional:** We do not wait for people to fit in. We **proactively design spaces**, workflows, and content that center people who have been historically excluded or invisibilized.
- **Equity is Structural:** Equality is not enough. We recognize and **actively respond to systemic disadvantage** by redistributing resources, rebalancing power, and adapting timelines, tools, and expectations to suit different starting points.
- **Diversity is Dynamic:** We value the presence and contributions of people with **different lived experiences, perspectives, neurotypes, life stories, and worldviews**, not just for the sake of numbers, but to deepen impact and relevance.
- **Justice is Ongoing:** We acknowledge our own privileges and gaps, commit to listening, and understand that **transformational DEI work is never finished**—it evolves through feedback, confrontation, reflection, and courage.



## 1.3 DEI Commitments Across Our Work

### Workforce & Leadership

- Develop inclusive job descriptions, outreach, and interview processes to recruit candidates from marginalized backgrounds.
- Prioritize gender equity and representation of historically excluded identities in leadership roles, board appointments, and decision-making forums.
- Provide targeted mentorship, sponsorship, and capacity-building opportunities for team members from underrepresented groups.

### Organizational Culture

- Create a workplace culture where people feel **safe to speak, show up fully, and challenge exclusionary behavior** without fear of retaliation.
- Normalize conversations around caste, gender, disability, class, and privilege through **internal reflection circles, anti-bias training, and peer accountability processes**.

### Accessibility

- Design physical workspaces, workshops, and field tools to be **universally accessible**, following the principles of **universal design and the RPWD Act**.
- Ensure communication tools (documents, videos, content) are accessible for people with visual, auditory, cognitive, or mobility impairments.
- Provide **reasonable accommodations** to team members, children, or partners with disabilities—without requiring disclosure or justification.

### Programs & Research

- Use **caste-conscious, trauma-informed, and inclusive research methods** that do not replicate institutional biases.
- Co-create programs with **disabled youth, Dalit, Adivasi, trans, queer, and first-generation learners** as designers, not just as beneficiaries.
- Design program timelines, outputs, and measures that account for **local context, power imbalance, and digital access gaps**.



## Media & Storytelling

- Create and promote stories that reflect the **plurality of real-life India**—not only through representation, but in who tells the story and how.
- Avoid tokenism, savior narratives, or framing communities through pity, shock, or rescue lenses.
- Invest in creative partnerships with artists, storytellers, and youth from **marginalized, non-urban, or non-English-speaking communities**.

## 1.4 Implementation & Monitoring

We recognize that DEI work must be **measurable, reviewed, and accountable** to the people it claims to center.

### Internal Mechanisms

- **Quarterly DEI reviews** by team leads, with progress indicators aligned to each department.
- **Anonymous DEI audit tools** shared with employees, interns, volunteers, and partners.
- Integration of DEI metrics into **performance evaluations, program reviews, and annual reports**.

### Representation Data

- Track representation across hiring, promotions, project leadership, and media presence.
- Use disaggregated data (by caste, gender, disability, language, etc.) to **diagnose gaps and adjust strategy**.

### Learning & Capacity Building

- Conduct **mandatory DEI training** during induction and annual workshops with an external facilitator.
- Develop **community-led learning modules** around anti-caste practice, inclusive facilitation, and unconscious bias.
- Document DEI learning and unlearning as part of our organizational knowledge base.



## Oversight & Accountability

- DEI is overseen by a **rotating team-led committee** and reviewed at the **board level**.
- Mistakes are addressed not with silence but with **acknowledgement, restitution, and revision**.
- We commit to co-creating DEI solutions **with affected stakeholders**—never imposing them top-down.



## Accessibility & Inclusion Policy

### Going to School (GTS)

#### Designing for Dignity, Participation, and Belonging

#### 1. Introduction

Going to School (GTS) believes that **accessibility and inclusion are non-negotiable rights**, not acts of charity or accommodation. We are committed to creating environments—physical, digital, educational, and organizational—where **every child, young person, colleague, and partner** can participate fully, equally, and with dignity, regardless of their physical, sensory, cognitive, or emotional abilities.

This policy outlines our principles, practices, and accountability systems to ensure that **inclusion is designed, not improvised**, and that **barrier-free participation** is embedded across every layer of our work.

#### 2. Definitions

- **Accessibility** refers to the **removal of physical, communication, attitudinal, and systemic barriers** that prevent individuals with disabilities or diverse needs from fully engaging in a space, service, or activity.
- **Inclusion** means designing environments and processes that proactively **welcome, value, and empower** people from marginalized groups—including but not limited to persons with disabilities, neurodivergent individuals, and those who use non-verbal modes of communication.
- **Disability** is understood as a **result of interaction between impairments and attitudinal/environmental barriers** that hinder full participation in society (UNCRPD definition).

#### 3. Legal and Ethical Foundations

This policy is grounded in the following frameworks:

##### Indian Laws:

- **Rights of Persons with Disabilities (RPWD) Act, 2016**
- **National Education Policy (NEP), 2020**



- **RTE Act, 2009** – Provisions for children with special needs
- **IT Act, 2000** – Guidelines on accessible digital content

#### **International Commitments:**

- **UN Convention on the Rights of Persons with Disabilities (UNCRPD)**
- **UN Convention on the Rights of the Child (UNCRC)**
- **Sustainable Development Goals (SDGs):**
  - SDG 4: Inclusive & equitable quality education
  - SDG 10: Reduced inequalities

#### **4. Scope of Application**

This policy applies to:

- All GTS programs, content, and partnerships (in schools, on screen, online, or in the field)
- All team members: full-time, part-time, interns, consultants, volunteers, and trustees
- All physical and digital infrastructure used by GTS
- All children, youth, adults, and communities we engage with—including those with visible, invisible, permanent, temporary, or situational disabilities

#### **5. Guiding Principles**

- **Universal Design:** Programs and content are designed from the outset to be usable by as many people as possible, without the need for adaptation.
- **Nothing About Us Without Us:** Persons with disabilities and neurodivergent individuals must be involved in designing, reviewing, and testing all accessibility strategies.
- **Intersectionality:** We recognize the compounded exclusion experienced by children and adults at the intersection of **disability, caste, class, gender, language, and geography**.



- **Language of Dignity:** All communications—internal and external—must use non-stigmatizing, identity-affirming, person-first or identity-first language based on self-identification.

## **6. Accessibility in Practice**

### **6.1 Physical Accessibility**

- GTS ensures that offices, partner spaces, field sites, and content creation locations:
  - Have ramps, handrails, and wide doorways where possible
  - Offer accessible seating, toilets, and signage
  - Avoid clutter and provide clear circulation paths
- Accommodations are made in **internship placements** for students with mobility or sensory impairments

### **6.2 Digital Accessibility**

- All websites, mobile apps, and digital content must:
  - Follow **WCAG 2.1 AA standards**
  - Be compatible with screen readers and keyboard navigation
  - Avoid flashing content or complex interfaces that cause sensory overload
- Alt-text for all images, transcripts for audio/video, and Easy Read versions of key documents are provided

### **6.3 Communication Accessibility**

- GTS provides:
  - Content in multiple languages and formats (text, audio, symbol-based)
  - Large print and dyslexia-friendly typefaces where needed
  - Access to Indian Sign Language interpreters or captioning for public-facing events
- Staff are trained in **inclusive communication** and respectful interaction



#### **6.4 Programmatic Accessibility**

- All skill development, storytelling, and research programs:
  - Use **multi-modal instruction** (visual, auditory, tactile, experiential)
  - Include **reasonable accommodations** like extra time, visual aids, or sensory breaks
  - Provide assistive devices or transport where feasible
- Inclusion is **budgeted for and resourced**, not treated as a favor or exception

#### **7. Employment & Organizational Inclusion**

- Hiring processes must be **bias-aware and accommodation-ready**
- Reasonable accommodations are available during recruitment and onboarding
- Performance evaluations are adjusted for accessibility barriers, not productivity bias
- GTS celebrates **neurodiversity, lived disability experience, and access expertise** as organizational strengths

#### **8. Inclusion in Storytelling and Content Creation**

- GTS is committed to:
  - **Authentic, respectful representation** of children and adults with disabilities in its content
  - Avoiding tropes of pity, inspiration, or “overcoming” narratives
  - Including persons with disabilities as **creators, not just subjects**, in storytelling
  - Providing consent forms in **accessible formats** and ensuring understanding before participation



## **9. Inclusive Monitoring, Evaluation, and Learning (MEL)**

- All M&E tools will be reviewed for **language complexity, visual layout, and sensory load**
- Feedback from persons with disabilities and caregivers will be **prioritized**
- Accessibility indicators will be built into MEL frameworks (e.g., # of materials in Braille/audio, % of events with sign language)

## **10. Grievance Redressal and Accommodations**

- Anyone can request accommodations or report inaccessibility via:
  -  **accessibility@goingtoschool.com**
  -  A dedicated disability-inclusive helpline
- GTS will respond within **5 working days** and implement reasonable accommodations within **15 working days**
- Grievances related to accessibility will be reviewed by the **DEI and Safeguarding Committee**

## **11. Oversight and Accountability**

- The **Inclusion & Accessibility Taskforce**, composed of internal and external advisors with lived disability experience, will:
  - Audit quarterly progress
  - Recommend corrective actions
  - Co-create training and awareness materials
- The Board will receive an **annual accessibility report**, including case studies, impact stories, and feedback from disabled stakeholders

## **12. Review and Continuous Learning**

This policy will be reviewed every 12 months or sooner based on:

- Evolving legal mandates



- Feedback from disabled children or adults
- Technological advancements in accessibility tools
- Programmatic learning from implementation in field sites

**Training and orientation on this policy is mandatory for all staff and partners and will be embedded in GTS's onboarding, leadership development, and content team processes.**



## **Going to School Data Protection Policy for Minors**

*Upholding the Privacy, Rights, and Dignity of Children and Young People*

### **1. Introduction**

Going to School (GTS) is committed to safeguarding the **privacy, dignity, and data rights of all children and young people** involved in our programs. We recognize that children have a distinct right to protection from exploitation, misuse, or loss of their personal and sensitive information.

This policy establishes the framework for how GTS **collects, stores, uses, secures, and disposes of data** concerning minors (individuals under the age of 18), across all locations and contexts—including schools, internships, media content creation, research, and digital learning platforms.

It applies to all GTS staff, interns, volunteers, vendors, contractors, consultants, trustees, and partner organizations. It also reinforces our organizational commitment to **child safeguarding, digital ethics, and legal compliance**.

### **2. Legal and Regulatory Framework**

This policy is grounded in the following laws and rights-based frameworks:

- **The Information Technology Act (2000) & IT (Reasonable Security Practices) Rules, 2011**
- **The Protection of Children from Sexual Offences (POCSO) Act, 2012**
- **Juvenile Justice (Care and Protection of Children) Act, 2015**
- **The Personal Data Protection Bill** (India – pending enactment)
- **Rights of Persons with Disabilities (RPWD) Act, 2016**
- **UN Convention on the Rights of the Child (UNCRC)** – particularly Article 16 (Right to Privacy)
- **National Commission for Protection of Child Rights (NCPCR) Guidelines**

### **3. Scope of the Policy**

This policy applies to:



- All children (aged 0–18) who engage in GTS programs (in school, out of school, internships, content creation)
- All data formats: written, visual, digital, biometric, location-based, and behavioral
- All GTS projects: research, media, design, skills education, monitoring & evaluation
- All stakeholders interacting with such data, including GTS employees, creative teams, partner organizations, funders, and evaluators

#### **4. Types of Child Data Covered**

- **Personally Identifiable Information (PII):** Full name, date of birth, address, school name, ID number
- **Photographs and Media:** Still images, audio recordings, video footage, animation likeness
- **Sensitive Personal Data:** Disability, caste, religion, health records, parental occupation, family income
- **Biometric and Digital Data:** Fingerprints, geotagging, facial recognition, device usage data, chat logs
- **Survey and Research Inputs:** Baseline/endline data, feedback forms, testimonials, storyboards

#### **5. Data Protection Principles**

GTS follows the **seven foundational principles of ethical data protection:**

1. **Lawful and Transparent Collection**  
Data is collected only after informed consent/assent and used strictly for programmatic needs.
2. **Purpose Limitation**  
Data is used only for the purpose it was collected. No repurposing or secondary use is allowed.
3. **Data Minimization**  
Only the minimum required information is collected—no excess or irrelevant data is stored.



#### 4. **Accuracy and Updating**

Data is regularly reviewed and corrected to prevent harm due to outdated or incorrect records.

#### 5. **Limited Access and Confidentiality**

Access to sensitive child data is strictly role-based and documented in audit logs.

#### 6. **Storage Limitation**

Data is retained only as long as necessary and securely deleted thereafter, as per retention policy.

#### 7. **Child-Centric Consent**

Consent processes prioritize understanding, dignity, and inclusion of both children and guardians.

### **6. Consent and Assent**

- Written **informed consent** from a parent, guardian, or institutional authority is mandatory before collecting or publishing any data about a child.
- Where the child is over **12 years old**, **assent** is also sought—ensuring they understand the purpose, use, and risks involved.
- All consent/assent forms are:
  - Translated into local languages
  - Available in Easy Read and pictorial formats
  - Explained orally by trained staff where literacy or disability is a barrier

Consent is not one-time; it is **renewed** when the purpose or context of use changes.

### **7. Use and Sharing of Data**

- Data is used **only** for the purpose it was explicitly collected for (e.g., a TV show, evaluation, curriculum design).
- It is **never shared** with third parties—including donors, sponsors, or collaborators—without:
  - Guardian-signed consent, and
  - A signed data-sharing agreement that includes safeguarding protocols.



- **GTS does not sell, trade, or use child data for profiling, advertising, or political content.**
- All images, videos, or stories used in **external communication (websites, reports, events)** require a separate case-by-case release and must avoid:
  - Revealing location or school name
  - Stigmatizing portrayal of caste, poverty, disability, or gender

## **8. Data Storage and Security**

GTS ensures **technical and administrative safeguards** for data protection, including:

- **Encrypted digital storage systems** with two-factor authentication
- **Role-based access** with time-stamped audit logs
- Regular **data backup**, password hygiene training, and device security protocols
- **Paper-based data** (e.g., consent forms) stored in locked cabinets within secure offices
- **Biometric and geotagged data**, if collected, is anonymized and stored separately
- Mandatory **data protection training** for all staff working with children or child data

## **9. Rights of the Child Regarding Their Data**

Children and their guardians have the right to:

- **Access:** Review the data collected about them
- **Withdraw Consent:** Request data deletion or discontinue participation at any time
- **Correction:** Request changes to incorrect or misleading information
- **Erasure:** Request removal of their data after the program concludes (unless legally restricted)



These rights are explained in **child-friendly language**, and a trained staff member assists children and guardians in accessing or exercising them.

## **10. Breach Management**

If there is a suspected or confirmed data breach:

- The **Data Protection Officer** must be notified within **24 hours**
- Affected children/guardians will be informed immediately
- A **root cause analysis** will be conducted and documented
- Corrective actions (technical or procedural) will be taken within **48–72 hours**
- The breach is reported to appropriate authorities, including **NCPCR**, if harm is suspected

All breaches are recorded in a **Breach Incident Register** and reviewed quarterly.

## **11. Oversight and Review**

- The **GTS Data Protection Committee** includes members from safeguarding, legal, digital, and research teams.
- This committee meets **quarterly** to:
  - Review adherence to the policy
  - Analyze risk from evolving technologies (e.g., AI in education)
  - Update protocols based on field realities or legal amendments
- Annual data protection reports are shared with:
  - The **Executive Director**
  - The **Board of Trustees**
  - Independent legal or safeguarding auditors (where applicable)



## **12. Integration with Other Policies**

This policy is read in conjunction with:

- **GTS Child Protection & Safeguarding Policy**
- **Whistleblower Policy**
- **POSH Policy**
- **DEI Commitments**
- **Code of Conduct**
- Program-specific data usage protocols (TV, field research, internships)



## Going to School Human Resources (HR) Policy

### **Inclusive, Ethical, Transparent, and Mission-Aligned Employment**

#### **1. Introduction**

At **Going to School (GTS)**, our people are central to the impact we create. Whether in classrooms, communities, media studios, or policy dialogues, the values, safety, and dignity of our team members are critical to our mission of empowering young people through storytelling and skills.

This HR Policy is a comprehensive framework that governs how we **recruit, support, evaluate, and develop our people**. It reflects GTS's **zero tolerance for discrimination**, commitment to **diversity, equity, and inclusion (DEI)**, and focus on **child protection, sustainability, and ethical leadership**.

#### **2. Objectives of the Policy**

- Ensure fair, transparent, and inclusive hiring and employment practices
- Embed DEI principles across all HR systems and organizational culture
- Promote employee wellbeing, safety, and professional development
- Provide mechanisms for accountability, feedback, and ethical conduct
- Foster a collaborative, child-safe, and values-driven work environment

#### **3. Scope and Applicability**

This policy applies to:

- All **full-time, part-time, contractual, freelance, and volunteer** staff
- **Interns, fellows, and consultants**
- **Board members, trustees**, and advisors in their capacity as GTS stakeholders
- Applicable vendors, partners, or grantees through sub-agreements



#### **4. Equal Opportunity & Non-Discrimination**

GTS is an **equal opportunity employer**. Employment decisions are made solely based on **qualifications, experience, potential, and values alignment**—without regard to:

- Caste, class, religion, language, region
- Gender identity or sexual orientation
- Age, marital status, or pregnancy
- Disability or neurodiversity
- Political opinion, educational background, or lived experience

Any form of **direct or indirect discrimination, harassment, or retaliation** will trigger a formal investigation and disciplinary action.

#### **5. Inclusive Hiring & Onboarding**

- Job descriptions will be reviewed for **bias, accessibility, and inclusive language**
- Shortlisting will use anonymized CV review, wherever feasible
- Reasonable accommodations will be provided during interviews
- Diversity of gender, caste, ability, and language will be considered in final selection
- All new hires will undergo:
  - **Child Protection & POSH induction**
  - **DEI training**
  - **Organizational ethics and safeguarding orientation**

#### **6. Compensation & Benefits**

GTS provides:

- **Equitable compensation** guided by internal salary bands and market benchmarking



- **Transparent promotion pathways** and annual performance reviews
- **Paid leave:** sick leave, parental leave (inclusive of all genders), menstrual leave, bereavement leave
- **Health insurance** for employees
- **Disability accommodation support** (assistive devices, mobility, flexibility)

## **7. Working Hours**

GTS programs are implemented in schools and in the field from **Monday to Saturday**. Due to the nature of our work, **remote work is not feasible for field-based implementation teams**.

We request that all program staff are **present on-site**—either **in the field, in schools, or in the office**—on their designated working days. Participation is expected in person to deliver and support programs where they matter most: **with children and communities**.

Office-based staff may have flexible working hours where job roles permit, based on **prior approval** from their team lead and the operational needs of the organization.

## **8. Learning, Growth, and Appraisal**

- All employees have access to:
  - Annual **Learning & Development Plan**
  - **DEI and leadership workshops**
  - **Performance and reflection dialogues** every six months
- Appraisals focus on:
  - Technical outcomes
  - Collaboration and communication
  - Ethical conduct, safeguarding, and DEI practice



## **9. Grievance Redressal and Conflict Resolution**

- All grievances may be reported to:
  - **HR Lead**
  - **DEI Committee Member**
  - **Safeguarding Team**
  - **Whistleblower platform** (for anonymous reporting)
- GTS follows a **restorative, trauma-informed grievance approach**, prioritizing:
  - Confidentiality
  - Safety and dignity of all parties
  - Time-bound resolution (within 14 working days)

Disputes may be escalated to the **Grievance & Ethics Committee**, which includes internal and external members.

## **10. Protection from Sexual Harassment (POSH)**

GTS is fully compliant with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**. This includes:

- A trained **Internal Committee (IC)**, including one external expert
- Mandatory POSH induction and refresher every year
- Gender-inclusive POSH complaint mechanisms for people of all identities
- Immediate safeguarding actions, and no retaliation

## **11. Child Protection & Safeguarding Compliance**

All employees must:

- Read and sign the **GTS Child Protection Policy**
- Complete training on child safeguarding, boundaries, and ethical interaction
- Avoid any one-on-one unsupervised contact with minors



- Report all violations immediately, even if suspected

## **12. Workplace Culture & Inclusion**

GTS promotes a culture of:

- **Open feedback**, peer listening, and critical reflection
- **Language and space accessibility** (for all genders and abilities)
- **Team wellness practices**: mental health days, support circles, and therapy reimbursements
- Recognition of **invisible labor**—emotional work, translation, facilitation, and access
- Respect for **cultural diversity**, including regional festivals, rituals, and dietary needs

All team celebrations are **opt-in**, inclusive, and alcohol-free.

## **13. Exit & Transition Protocol**

- Employees are expected to give **15-30-60 days 'notice** (depending on their contract)
- GTS conducts **Exit Interviews** to capture learning, feedback, and closure
- Final settlement, documentation, and references are processed within **14 working days**

## **14. Accountability and Disciplinary Action**

Violations of this HR policy—including unethical conduct, discrimination, or policy non-compliance—may result in:

- Written warning
- Performance plan or re-training
- Suspension or dismissal
- Reporting to law enforcement (for criminal or safeguarding breaches)



## **15. Oversight and Review**

- HR policy compliance is monitored by the **HR & Ethics Panel**, reviewed quarterly
- Annual HR audit conducted by external HR consultant and/or DEI advisor
- Staff survey and feedback mechanisms guide revisions
- The full HR Policy is reviewed **every 18 months** or after any legal update

## **16. Integration with GTS Ethics and Operational Frameworks**

This policy is implemented alongside:

- Code of Conduct
- Ethics & Values Policy
- Whistleblower Policy
- Child Protection & Safeguarding Policy
- POSH Policy
- Anti-Bribery & Fraud Policy
- DEI & Accessibility Commitments



## Going to School Monitoring & Evaluation (M&E) Policy

*Equity-Driven Evidence | Inclusive Learning | Accountable Impact*

### **1. Introduction**

At **Going to School (GTS)**, Monitoring & Evaluation (M&E) is not just a compliance exercise—it is a cornerstone of how we learn, improve, and remain accountable to children, communities, and donors. We design our M&E systems to be **participatory, child-centered, inclusive, and equitable**, ensuring that data serves the people from whom it is collected.

This policy defines how M&E is integrated into all GTS programs, how it aligns with our **values of gender equity, DEI, safeguarding, and accessibility**, and how findings are used for **continuous improvement and advocacy**.

### **2. Purpose and Objectives**

The purpose of this policy is to:

- Guide the planning, implementation, analysis, and use of M&E across all GTS projects
- Ensure that data is collected ethically, disaggregated, and used to strengthen equity
- Build a culture of **reflection, learning, and adaptation**, grounded in evidence
- Align with national frameworks, donor expectations, and international child rights standards

### **3. Guiding Principles**

#### **3.1 Gender-Responsive M&E**

- Data is collected and analyzed by **sex, gender identity, and role** within families and communities
- Tools explore **how programs impact children of different genders differently**
- Evaluators are trained to **identify bias, power imbalance, and intersectional gender barriers**



### **3.2 DEI-Driven M&E**

- Indicators are designed to **capture inclusion and marginalization patterns** (e.g., caste, class, language, disability)
- Youth, women, neurodivergent individuals, and those from underrepresented communities are involved in **design and feedback**
- Outcomes are not only about scale, but also about **equity of access and participation**

### **3.3 Accessibility and Inclusion**

- M&E tools are **multi-format** (e.g., pictorial, verbal, tactile)
- Consent processes are **accessible, language-appropriate, and child-friendly**
- People with disabilities are engaged as both **participants and data collectors**, wherever possible

### **3.4 Ethics, Safety, and Consent**

- All data collection is governed by GTS's **Child Protection and Data Protection Policies**
- No child is ever coerced to participate in an interview, survey, or filming
- Trauma-informed, gender-sensitive, and culturally safe practices are standard

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

This policy applies to:

- All GTS programs (school-based, community-based, media, research, digital)
- All evaluation types (baseline, endline, longitudinal, impact assessments)
- All GTS staff, consultants, M&E partners, enumerators, and vendors
- All stakeholders (children, parents, teachers, government partners)



## **5. M&E Design and Implementation**

### **5.1 Inclusive Indicator Development**

- Indicators are co-developed with program, safeguarding, DEI, and field teams
- All indicators are **disaggregated by gender, disability, caste, and geography**
- Inclusion-specific indicators track:
  - Who is represented and who is not
  - Barriers to participation
  - How dignity, safety, and agency are experienced

### **5.2 Participatory Evaluation**

- Children, families, teachers, and community members are invited to:
  - Validate tools
  - Share feedback in design workshops
  - Co-analyze findings (where appropriate)

### **5.3 Data Collection Methods**

- Surveys, interviews, focus groups, creative storytelling, and digital platforms
- Researchers are trained in **neutral questioning, body language, gender safety**
- Enumerators are selected with attention to **language, local identity, and trust**

## **6. Data Management and Protection**

- All data systems follow **GTS Data Protection Policy for Minors**
- Consent is obtained from **both guardians and children**, with assent processes for children over age 12
- Digital data is stored **securely**, and hard copy materials are kept in **locked cabinets**
- No identifiable child data is shared with third parties without express consent



## **7. Use of M&E Findings**

- Findings are used for:
  - **Adaptive program design**
  - **Inclusive content creation**
  - **Safeguarding enhancements**
  - **Policy advocacy** on equity in education and skills
- Reports are shared in **child- and community-friendly formats**, such as comics, videos, or audio recordings in local languages

## **8. Oversight and Learning**

- A **Monitoring, Evaluation & Learning (MEL) Committee** oversees compliance with this policy
- GTS reviews the policy every **12 months** based on:
  - Learning from the field
  - Feedback from youth and community partners
  - Changes in legal, donor, or ethical standards

## **9. Alignment with Other GTS Policies**

This M&E Policy works in conjunction with:

- **Child Protection & Safeguarding Policy**
- **Data Protection Policy**
- **Gender and DEI Commitments**
- **Accessibility and Inclusion Policy**
- **Whistleblower and Ethics Policy**

At GTS, we believe that **data must reflect dignity, measurement must be equitable, and evaluation must be a tool for liberation, not judgment.** This policy ensures that our M&E practices embody these values and drive meaningful, inclusive impact for all the children we serve.



## Going to School Volunteer Engagement Policy

*Empowering Service | Ensuring Safety | Enabling Equity*

### 1. Introduction

Volunteers are a valued and integral part of **Going to School (GTS)**. Whether they contribute through field support, storytelling, content creation, translation, accessibility assistance, research, or mentorship, volunteers help extend the reach, relevance, and impact of GTS programs.

This **Volunteer Engagement Policy** outlines the principles, procedures, and protections guiding volunteer participation to ensure that all engagements are **ethical, inclusive, safe, meaningful, and rights-based**.

### 2. Purpose of the Policy

This policy aims to:

- Define how volunteers can contribute to GTS's mission across departments and projects
- Ensure volunteer activities are aligned with **child protection, DEI, and organizational ethics**
- Establish standards for recruitment, training, conduct, supervision, and grievance redressal
- Create a respectful, inclusive environment where volunteers and communities mutually benefit

### 3. Scope of Application

This policy applies to:

- All individuals volunteering with GTS (including short-term, long-term, remote, field-based, and event-specific volunteers)
- Volunteers working with school programs, community outreach, youth engagement, research, translation, digital content, and office support
- Interns and fellows serving in unpaid or partially compensated roles
- National and international volunteers



Volunteers are **not employees** and are not entitled to wages, benefits, or employment status. However, GTS extends volunteers the same dignity, respect, and safety as staff.

## 4. Core Principles

### 4.1 Volunteering is Voluntary

Volunteers freely choose to offer their time and expertise. Participation is never coerced, exchanged for favors, or conditional on employment or academic advancement.

### 4.2 Dignity and Inclusion

All volunteers are treated with fairness and respect, regardless of age, gender identity, caste, class, religion, disability, sexual orientation, or educational background.

### 4.3 Child-Centered Practice

Volunteers are expected to uphold the **GTS Child Protection and Safeguarding Policy** and never engage in unsupervised or undocumented interactions with children.

### 4.4 Clarity and Transparency

Volunteers receive clear communication about expectations, tasks, support, and time commitment. No one is asked to contribute beyond what was agreed.

### 4.5 Reciprocity and Learning

GTS sees volunteering as a two-way exchange—volunteers contribute to impact, and in return, gain skills, insight, mentorship, and a shared sense of purpose.

## 5. Categories of Volunteers

Type	Role	Examples
Field Volunteer	Supports school or community programs	Assisting with workshops, observations, photography
Creative Volunteer	Collaborates on storytelling and content	Translating subtitles, reviewing scripts, graphic support
Research Volunteer	Aids in data collection, analysis	Survey support, transcription, documentation



<b>Administrative Volunteer</b>	Provides operations/logistics assistance	Filing, data entry, reception, office organization
<b>Remote/Digital Volunteer</b>	Works virtually	Accessibility review, social media support, remote coding

## 6. Recruitment and Selection

### 6.1 Application Process

- Volunteers apply through a form on the GTS website or are referred through partner institutions
- Applications include intent, background, skills, availability, and areas of interest

### 6.2 Screening

- Interviews are conducted (in person or remotely) to ensure alignment of values and suitability for volunteer tasks
- Volunteers interacting with children are required to submit:
  - Proof of identity
  - Self-declaration regarding criminal background
  - Consent to adhere to safeguarding policies

### 6.3 Acceptance and Orientation

- Selected volunteers receive:
  - A formal letter of engagement (duration, role, scope)
  - GTS Volunteer Handbook
  - Policy briefings: Child Protection, Code of Conduct, DEI, Ethics
  - Supervisor assignment and introductory call/meeting

## 7. Volunteer Responsibilities

Volunteers must:



- Act with honesty, humility, and professionalism
- Respect confidentiality of data, children, and community stories
- Follow GTS's **Child Protection**, **DEI**, and **POSH** policies
- Never take photos, post stories, or share children's identities without written consent
- Report any safeguarding concerns or policy breaches immediately
- Respect the values, leadership, and feedback of children and community members

Volunteers **must not**:

- Represent GTS publicly or with media without written authorization
- Request or accept gifts or compensation from children/families
- Give gifts, personal contact details, or money to beneficiaries
- Be alone with a child at any time
- Use their role to seek personal, commercial, or academic gain

## 8. Support and Supervision

- Each volunteer is assigned a **point of contact/supervisor**
- Regular check-ins are held to discuss progress, feedback, and support needs
- Volunteers are invited to GTS events, team discussions, and feedback sessions
- Reference letters, certificates, or endorsements may be provided upon successful completion and supervisor feedback

## 9. Duration and Termination

- Volunteer terms may vary from **1 day to 1 year**, depending on the role
- Either party can terminate the engagement with a **written explanation and 1-week notice**



- GTS reserves the right to suspend or terminate any volunteer engagement in cases of:
  - Misconduct or breach of policy
  - Reputational or safety risk
  - Repeated absenteeism or non-performance

## **10. Health, Safety, and Insurance**

- Volunteers participating in field activities are briefed on:
  - Travel safety
  - Emergency contact protocols
- GTS does not provide personal accident or health insurance. Volunteers are advised to ensure personal coverage.

## **11. Recognition**

- GTS honors volunteer contributions through:
  - Acknowledgment in reports or events

## **12. Confidentiality and Data Protection**

- Volunteers must sign and adhere to GTS's **Data Protection Agreement**
- Any photographs, quotes, recordings, or observations are:
  - Used only for agreed purposes
  - Anonymized or consented to in writing
  - Not stored or shared beyond the GTS system

## **13. Grievance and Feedback Mechanism**

- Volunteers may raise concerns about staff, practices, or ethics through:
  - [integrity@goingtoschool.com](mailto:integrity@goingtoschool.com)



- **safeguarding@goingtoschool.com** (if involving child safety)
- Online feedback/reporting form
- GTS commits to:
  - Acknowledging all complaints within 48 hours
  - Investigating impartially and confidentially
  - Offering support and non-retaliation protections

#### **14. Oversight and Policy Review**

- The **Volunteer Engagement Coordinator** and **HR Lead** oversee implementation
- The policy is reviewed annually to:
  - Incorporate volunteer feedback
  - Address field or legal changes
  - Improve safety, ethics, and inclusiveness

#### **15. Alignment with GTS Policies**

This policy is implemented alongside:

- Child Protection & Safeguarding Policy
- Code of Conduct
- Ethics & Whistleblower Policy
- DEI and Accessibility Commitments
- Data Protection and Storytelling Guidelines
- POSH and Grievance Redressal Mechanisms



## Going to School Financial Procedures Policy

*Transparent. Accountable. Mission-Driven.*

### 1. Introduction

This policy outlines the financial procedures followed at **Going to School (GTS)** to ensure that all financial resources are **used responsibly, efficiently, and in full alignment with donor agreements, legal regulations, and the organization's mission**. It sets forth a clear framework for budgeting, expenditure, accounting, reporting, and auditing.

### 2. Objectives

- Establish financial discipline and transparency
- Ensure all expenditures are **pre-approved, documented, and audit-ready**
- Enable efficient financial planning and **cash flow management**
- Comply with **Indian financial laws** (FCRA, Income Tax Act, Companies Act) and **donor requirements**
- Mitigate risks of **misuse, fraud, and financial irregularities**

### 3. Scope

This policy applies to:

- All GTS employees (full-time, part-time, consultants)
- All program teams and field offices
- Finance, procurement, admin, and donor management functions
- All GTS grant-funded and unrestricted projects
- All vendors and partners receiving funds or reimbursement from GTS



#### 4. Budgeting Process

- Annual budgeting is initiated 3 months before the start of the financial year
- Program teams prepare activity-based budgets with support from Finance
- Budgets are reviewed by the **Senior Management Team (SMT)** and approved by the **Board of Trustees**
- Each donor/project has a **separate, detailed budget line** in the chart of accounts
- Budgets are uploaded to the **accounting system and expense tracker** for real-time monitoring

#### 5. Expenditure Control & Authorization

Amount	Approval Authority
Up to ₹25,000	Program Lead / Department Manager
₹25,001 – ₹100,000	Program Lead + Finance Manager
₹100,001	Director / Board Member with documentation

- All expenditures must begin with a **Purchase Requisition Form (PRF)**
- PRFs must reference relevant **budget line items and donor codes**
- Finance team validates availability of budget before proceeding

#### 6. Procurement & Payments

- GTS follows a **Procurement Policy** (refer to separate document)
- All vendors are pre-vetted and approved
- All invoices must include GST/Tax compliance and proof of delivery
- Payments are made by **bank transfer/NEFT**. No cash payments above ₹10,000
- Petty cash limits: ₹10,000 per office, reconciled every week



## 7. Reimbursements

- Employees may claim pre-approved work expenses
- Must submit original, GST-compliant bills with a Reimbursement Form
- Claims must be submitted within **15 days** of the expense
- Reimbursements processed within **7 working days** of complete submission

## 8. Accounting and Record-Keeping

- All transactions recorded in GTS's accounting system within **3 business days**
- Donor-wise and program-wise segregation maintained
- Every entry includes: invoice, donor/project code, payment mode, and approval trail
- Supporting documents are scanned and archived in both **digital and physical form**
- All entries comply with Indian Accounting Standards and NGO audit requirements

## 9. Bank and Cash Management

- GTS maintains **separate bank accounts** for FCRA and domestic funds
- Only authorized signatories (as per Board resolution) can operate accounts
- **Monthly bank reconciliations** are performed by Finance
- Cash withdrawals (if any) are documented with usage logs and receipts

## 10. Financial Reporting

- Monthly internal reports shared with SMT
- Quarterly reports submitted to donors, including:
  - Budget vs Actual expenditure
  - Variance explanations



- Burn rate analysis
- Cash flow forecasts
- Finance dashboards track fund utilization and disbursement timelines

### 11. Audit and Compliance

- **Internal audit** every quarter by a designated firm or Board sub-committee
- **External audit** annually, covering all legal and donor compliance
- GTS maintains:
  - Fixed Asset Register
  - Ledger-wise expense history
  - GST filings and TDS records
  - Annual returns for Income Tax and FCRA

### 12. Retention and Archiving

- All financial records (vouchers, contracts, receipts, bank statements) are retained for **8 years**
- Digitized copies are stored on GTS's secure cloud system with restricted access
- Sensitive data is protected per GTS's **Data Protection Policy**

### 13. Roles and Responsibilities

<b>Role</b>	<b>Responsibility</b>
Finance Manager	Maintain books, ensure compliance, generate reports
Program Manager	Approve PRFs, monitor budgets, flag irregularities
Director/Trustees	Review budgets and financial health, ensure risk mitigation
Auditors	Provide assurance and review controls
Admin/Procurement	Process orders, verify delivery, track assets



#### **14. Violations and Disciplinary Action**

- Any financial mismanagement, fraud, or non-compliance will be investigated
- GTS will take disciplinary action including suspension, termination, or legal referral
- Whistleblower protections apply to anyone reporting financial concerns in good faith

#### **15. Policy Review and Updates**

- This policy is reviewed **annually** or when required by law/donor updates
- Reviewed by Finance Committee and approved by the Board
- Updates communicated to all staff and reflected in the Finance Handbook



## Going to School Fixed Asset Policy

*Secure | Track | Maintain | Dispose Responsibly*

### 1. Introduction

This policy outlines how **Going to School (GTS)** manages all **fixed assets**, including their **purchase, tagging, tracking, usage, depreciation, and disposal**. It ensures that all assets are used effectively for program delivery, maintained in working condition, and accounted for in financial reports and audits.

### 2. Purpose

To establish a **systematic, transparent, and auditable process** for managing GTS's fixed assets across all locations and teams.

### 3. Definition of a Fixed Asset

A **fixed asset** is any tangible, non-consumable item:

- With a purchase value above ₹10,000
- With a useful life of more than one year
- Used for program, administrative, or operational purposes

Examples: laptops, projectors, cameras, tablets, printers, vehicles, furniture.

### 4. Scope of Application

This policy applies to:

- All GTS offices and program locations
- All employees, interns, consultants, and project partners
- All items purchased using **GTS funds, donor funds, or grants**



## 5. Responsibilities

Role	Duties
<b>Finance Team</b>	Maintain asset register, depreciation, and audit records
<b>Operations/Admin</b>	Tag assets, manage assignment, monitor location/status
<b>IT Coordinator</b>	Inspect, repair, maintain digital/tech assets
<b>Users/Teams</b>	Use assets responsibly, report damage or transfer
<b>Auditor</b>	Verify physical and register records annually

## 6. Acquisition Procedure

### 6.1 Procurement

- A **Purchase Requisition Form (PRF)** must be raised by the requesting department
- Approved as per procurement thresholds and policy
- Procurement team sources quotes and places an order through approved vendor

### 6.2 Asset Identification

- Upon receipt, the asset is:
  - Verified for compliance and quality
  - Assigned a unique **Asset Tag/Barcode**
  - Recorded in the **Fixed Asset Register (FAR)**

## 7. Fixed Asset Register (FAR)

The FAR is a centralized digital log that includes:

- Asset ID / Tag number
- Asset description (type, brand, model)



- Serial number
- Date of purchase and cost
- Assigned user/department and location
- Funding source/donor code
- Warranty period and service details
- Depreciation schedule
- Status (active, under repair, disposed)

The FAR is updated with every new asset, transfer, repair, or disposal.

### **8. Asset Tagging**

- All assets are labeled within **7 days** of delivery
- Tags include: **GTS Asset ID**, year of purchase, and department
- Unauthorized removal of asset tags is a violation

### **9. Assignment and Custody**

- Each asset is issued to a designated user via a signed **Asset Handover Form**
- Custodians are accountable for:
  - Responsible usage
  - Reporting faults or transfers
  - Returning the asset during exit or reassignment
- No personal or external use is allowed without written authorization

### **10. Maintenance and Repairs**

- Preventive checks are scheduled **quarterly** (especially for tech equipment)
- Users must report malfunctions immediately to the Admin/IT team



- Repairs are logged in the FAR with vendor/service details
- Maintenance costs are booked under respective program admin expenses

## 11. Depreciation

Depreciation is charged annually as per applicable **Income Tax and NGO Accounting Guidelines**:

<b>Asset Type</b>	<b>Depreciation Rate (Suggested)</b>
Laptops/IT equipment	40% (WDV)
Furniture & fixtures	10% (WDV)
Cameras/Media gear	30% (WDV)
Vehicles	15% (WDV)

Finance records depreciation in books and donor financial reports.

## 12. Physical Verification

- Full **physical inventory verification** is conducted annually
- Any missing, damaged, or untagged assets are reported in the **Asset Audit Report**
- Discrepancies are explained, justified, and resolved by the Finance & Admin Committee

## 13. Asset Transfer

- Assets may be transferred across locations or projects upon:
  - Submission of a **Transfer Request Form**
  - Entry in the FAR and signed acknowledgment from the new user/location
- Unauthorized relocation is not permitted



## 14. Asset Disposal

Assets may be disposed when:

- Non-functional or irreparable
- Obsolete or replaced
- End-of-project surplus

Disposal requires:

1. **Disposal Request Form** with reason
2. **Operations and Finance Approval**
3. FAR update (disposed status, method: sale, donation, destruction)
4. E-waste handled through licensed recyclers per **e-Waste Management Rules, 2016**

If sold, proceeds are documented and credited to the project or general fund.

## 15. Donor-Funded Assets

- Assets purchased under donor grants are **tagged with donor codes**
- During grant closure:
  - Handover is as per donor agreement (reallocation, disposal, transfer)
  - Donor clearance is required for disposal if stated in MOU
  - Records retained in grant closure documentation

## 16. Loss, Theft, or Damage

- Incidents must be reported within **24 hours**
- Investigation conducted and noted in an **Incident Register**
- For losses above ₹25,000, a police FIR may be filed
- Responsibility (if due to negligence) assessed by HR/Admin



## 17. Record Retention

- All forms (PRF, handover, transfer, disposal) retained digitally and physically for **8 years**
- FAR is backed up quarterly on GTS's secure cloud servers

## 18. Policy Review and Audit

- This policy is reviewed **every 2 years** or after major changes in accounting law or donor audit recommendations
- Oversight by the **Finance Committee and External Auditors**
- Updates communicated to all teams and reflected in Finance Manual



## Going to School Grant Expenditure Policy

### Standard Operating Procedure (SOP)

*Purposeful | Compliant | Transparent | Impact-Driven*

#### 1. Introduction

This policy ensures that **all expenditures of grant funds at Going to School (GTS)** are made with **integrity, accuracy, documentation, and alignment with approved project budgets**. It enables financial accountability, donor confidence, and mission-focused spending while minimizing the risk of waste, fraud, or misallocation.

#### 2. Purpose

- To ensure **responsible use** of funds allocated by donors
- To guide GTS teams on **expenditure approvals, documentation, and reporting**
- To comply with Indian financial and NGO laws including:
  - Income Tax Act, 1961
  - FCRA, 2010 (if applicable)
  - Accounting standards and donor agreements

#### 3. Scope

This policy applies to:

- All expenditures using grant funds (restricted or project-specific)
- All GTS program and support teams, field offices, and implementing partners
- Vendors, consultants, and contractors paid through grants
- All grant sizes (national, international, institutional, CSR, government)



#### 4. Key Principles

Principle	Meaning
<b>Budget Alignment</b>	All expenses must correspond to an approved budget line
<b>Pre-Authorization</b>	Expenditures must be approved before commitment
<b>Documentation</b>	All spending must be supported by invoices, receipts, and approvals
<b>Donor Compliance</b>	Grant terms, eligible costs, and ceilings must be respected
<b>Transparency</b>	No personal benefit or hidden payments permitted
<b>Timeliness</b>	Payments and reporting must follow project timelines

#### 5. Eligible and Ineligible Expenditures

##### ✓ Eligible (if budgeted and approved)

- Salaries and benefits of project staff
- Travel and logistics for field activities
- Printing, content creation, and communication materials
- Program-specific technology and equipment
- Consultant or trainer fees
- Venue rentals, refreshments (for events)
- Monitoring, evaluation, and documentation costs

##### ✗ Ineligible (unless explicitly allowed)

- Personal expenses (even if related to project)
- Unapproved gifts, tips, or donations
- Alcohol, tobacco, entertainment
- Late penalty fees or fines
- Overhead beyond agreed indirect cost rate
- Expenditure made without supporting bills or documentation



## 6. Grant Expenditure SOP

### Step 1: Budget Reference

- Refer to the **approved donor budget** and relevant budget line item
- Confirm expense is within the allowed amount, activity timeline, and scope

### Step 2: Initiate Request

- Submit a **Purchase Requisition Form (PRF)** or expense request form
- Include:
  - Donor/project code
  - Purpose
  - Justification
  - Estimated amount

### Step 3: Approvals

- Approved by:
  - Program Lead (technical)
  - Finance Officer (financial)
  - SMT or Director (if threshold crossed)

### Step 4: Procurement or Disbursement

- Procurement follows GTS Procurement Policy
- Consultant/partner contracts must:
  - Cite the grant code
  - Be signed before work begins
  - Include agreed deliverables, timelines, and payment schedule



## Step 5: Documentation

For every expense, the following documents are mandatory:

Expense Type	Required Documents
Goods/Services	Invoice, delivery note, PRF, comparative statement
Consultant Payment	Contract, invoice, timesheet, deliverable proof
Travel	Tickets, boarding pass, itinerary, travel approval form
Reimbursement	Bills, signed claim form, bank details

All documents must be:

- In original (scanned and filed digitally)
- GST compliant (if applicable)
- Dated within the project period

## Step 6: Payment

- Processed via **bank transfer/NEFT** by Finance
- Cross-referenced with project code and budget line
- Payment vouchers entered into accounting software

## 7. Grant Financial Reporting

### Internal:

- Monthly expense vs. budget review
- Shared with Program Manager and SMT

### Donor:

- Quarterly/bi-annual reports as per donor template and timeline
- Include:
  - Budget vs actual



- Variance explanation
- Bank statements or utilization certificates

## **8. Grant Expense Monitoring**

- M&E and Finance team may conduct:
  - Spot checks of field expenses
  - Desk reviews of documentation
  - Quarterly expense audits
- All expense reports are stored for **8 years** and audit-ready

## **9. Variance and Reallocation**

- Any variation >10% from budget lines must be approved by:
  - GTS Director
  - Donor (if required by agreement)
- Internal reallocation between line items requires proper documentation

## **10. Closure and Final Reporting**

- Final expenditure statements submitted within 30 days of project end
- Surplus or unspent funds handled per donor agreement
- Final financial report accompanied by:
  - Utilization Certificate
  - Signed audited statement (if required)
  - Expense summary by line item



## 11. Red Flags and Fraud Prevention

- The following are strictly prohibited:
  - Double billing
  - Fake or duplicate invoices
  - Unjustified cash withdrawals
  - Personal benefit from grant funds

Any suspected misuse is investigated under GTS's **Whistleblower and Anti-Fraud Policy**.

## 12. Policy Review

This policy is reviewed **every 2 years** or upon:

- Change in legal/donor requirements
- Grant audit findings
- Organizational restructure or financial system change



# Going to School Grant Implementation Policy

*Strategic | Ethical | Inclusive | Results-Oriented*

## 1. Introduction

This policy governs the **implementation of projects funded through external grants** at Going to School (GTS). It ensures that all grants are implemented with **fiscal integrity, programmatic excellence, legal compliance, inclusion, and alignment with child rights and climate responsibility principles.**

## 2. Purpose

- Guide program teams in translating grant commitments into action
- Ensure timely delivery of project outputs and outcomes
- Align operations with **donor agreements, Indian law,** and GTS values
- Define roles, responsibilities, reporting, and review cycles
- Promote transparency, inclusion, learning, and accountability

## 3. Scope

This policy applies to:

- All **donor-funded** or **grant-based** projects implemented by GTS
- All departments involved in planning, delivery, documentation, finance, and reporting
- All external stakeholders involved in project execution (vendors, partners, freelancers)
- All grant sizes, including CSR, institutional, and multilateral donors



#### 4. Key Implementation Principles

Principle	How It's Applied
<b>Rights-Based</b>	All projects prioritize the rights, dignity, and safety of children and communities
<b>DEI and Gender Inclusion</b>	Activities are inclusive and address caste, gender, class, disability, and identity inequities
<b>Outcome-Oriented</b>	Focus on achieving measurable impact through planned deliverables
<b>Transparency</b>	All deliverables, timelines, and changes are documented and communicated
<b>Safeguarding First</b>	Staff and partners follow Child Protection, POSH, and Data Privacy policies
<b>Learning &amp; Adaptation</b>	Regular reflection, field learning, and beneficiary feedback guide program evolution

#### 5. Pre-Implementation: Grant Onboarding

##### 5.1 Project Mobilization

- Program lead assigned; internal kick-off held within 7 days of grant confirmation
- Teams receive grant documents (proposal, budget, logframe, contract, donor reporting schedule)

##### 5.2 Orientation

- All project staff and collaborators undergo:
  - Grant orientation
  - Safeguarding refresher
  - DEI and sustainability briefing
  - M&E framework overview

##### 5.3 Work Plan Development

- Quarterly implementation plan developed with:
  - Activities, timelines, responsible team members



- Procurement and travel needs
- Key performance indicators (KPIs)
- Approved by the Program Director and shared with Finance and M&E

## **6. Implementation: Project Delivery**

### **6.1 Activity Execution**

- Activities must follow the approved work plan and donor budget
- All events, fieldwork, or production must:
  - Be documented with attendance, media, and reflection notes
  - Follow GTS Safeguarding and Child Participation Protocols
  - Seek consent and ethical clearance for use of data or stories

### **6.2 Budget Adherence**

- All expenses follow the **Grant Expenditure SOP**
- Expenditure tracked monthly and reviewed jointly by Finance and Programs

### **6.3 Partner & Vendor Management**

- All partners/vendors sign:
  - GTS Grant Compliance Agreement
  - Safeguarding, Ethics, and Green Procurement declarations
- Contracts are activity-bound, time-bound, and milestone-driven

## **7. Monitoring, Evaluation & Learning (MEL)**

- Projects are monitored monthly using the grant's logical framework or Theory of Change
- MEL includes:
  - Field observation and validation
  - Beneficiary feedback



- Pre-post assessment (if applicable)
- Case studies and outcome documentation
- MEL findings are shared internally every quarter, and externally per donor timelines

## 8. Reporting & Communication

Report Type	Frequency	Responsibility
Internal review memo	Monthly	Program Manager
Donor progress update	Quarterly/Bi-annually	Program + M&E + Finance
Final narrative report	At grant closure	Program + Communications
Final financial report	At grant closure	Finance + Program Lead

All reports are submitted with clear outputs, KPIs, photos (with consent), financial breakdowns, and notes on learning and challenges.

## 9. Risk Management

Risks such as delays, non-performance, staff turnover, or budget underutilization must be:

- Flagged early by Program Leads
- Documented in Risk Logs
- Escalated to SMT for decision-making
- Shared with donor if impact is material

GTS takes a **no-surprise approach** with donors.

## 10. Variations & Amendments

- Any proposed change in:
  - Budget reallocation above 10% between budget lines



- Extension of timeline
- Key deliverable modification

...must be requested in writing to the donor, along with justification, revised work plan, and internal approval from the Director.

## 11. Grant Close-Out

(See also: Going to School Grant Closure SOP)

At the end of the grant period:

- All deliverables submitted and approved
- Final disbursements made and reconciled
- Fixed assets assigned, transferred, or disposed per donor guidance
- Final evaluation and impact summary compiled
- Closure meeting held with team and donor

Records retained for **at least 8 years** for audit and impact learning.

## 12. Review and Policy Governance

- This policy is reviewed **every two years** by the Grants & Programs team and SMT
- Updates are made to reflect changes in donor expectations, law, or organizational learning
- Reviewed grants are included in organizational learning reports and reviewed with the Board



## Going to School Grant Closure Policy

### 1. Introduction

Grant closure marks the completion of a donor-funded project cycle at **Going to School (GTS)**. This policy ensures that all grant-funded projects are closed **systematically, ethically, and in compliance** with donor requirements, financial regulations, and internal standards.

It emphasizes **documentation, financial reconciliation, donor communication, impact reporting**, and the responsible management of resources and data post-project.

### 2. Purpose

- To ensure **all programmatic, financial, contractual, and audit-related activities** are closed as per commitments
- To support donor stewardship through **final reports, communication, and gratitude**
- To capture **learning and impact** for future programming
- To ensure correct **asset reassignment or disposal**, and documentation of unspent funds or surpluses
- To reduce reputational, financial, or legal risks

### 3. Scope

This policy applies to:

- All donor-funded projects and grants (institutional, CSR, bilateral, multilateral, foundations)
- All GTS departments involved in grant execution, including Program, Finance, M&E, Admin, Procurement, HR, and Communications
- Any vendors, consultants, or partners engaged through the grant



#### **4. Timeline for Closure Activities**

<b>Phase</b>	<b>Timeframe</b>
Initiate Close-Out Plan	30–60 days before project end
Complete Deliverables	Final 30 days of implementation
Submit Final Reports	Within 30 days of project close
Conduct Closure Audit	Within 60 days (if required)
Archive Documentation	Within 90 days post-closure

#### **5. Closure Checklist & Responsibilities**

##### **5.1 Final Deliverables & Programmatic Completion**

- Ensure **all outputs and activities** promised in the grant agreement are delivered
- Cross-check logframes, KPIs, field reports, training logs, photos, and case studies
- Conduct any **endline assessments, learning reflections, or partner debriefs**

**Responsible:** Program Lead + M&E Team

##### **5.2 Financial Closure**

- Submit **final financial report** with actual vs budget utilization
- Include:
  - Utilization Certificate (UC)
  - Fund Reconciliation Statement
  - Balance confirmation or fund return evidence
- Tag and journal all expenses with correct project codes
- Return unspent funds or request carry-forward approval (in writing)

**Responsible:** Finance Team



### **5.3 Asset Management**

- Review **Fixed Asset Register (FAR)** for items procured under the grant
- Determine:
  - Transfer to another GTS project (with donor consent)
  - Return to donor (if contractually required)
  - Responsible disposal (with documentation)
- Update **Asset Handover/Disposal Logs**

**Responsible:** Admin/Operations + Finance

### **5.4 HR & Contractual Closure**

- End contracts for project-specific staff, consultants, and vendors
- Issue experience letters or acknowledgments
- Ensure final payments, benefits, and taxes are settled
- Conduct exit interviews and collect GTS assets (laptops, ID cards, etc.)

**Responsible:** HR + Project Coordinator

### **5.5 Documentation & Archiving**

- Organize:
  - Contracts, MoUs, POs
  - Reports and approvals
  - Communication or content created
  - MEL documents
- Archive physically and digitally for **minimum 8 years**
- Upload to cloud systems with appropriate naming conventions and access permissions

**Responsible:** Program Support + Compliance Team



## **5.6 Donor Engagement and Communication**

- Submit final **narrative and financial reports** as per donor templates and deadlines
- Share:
  - Photos, case studies, videos (with consent)
  - Any tools or toolkits developed
  - Final gratitude letter with impact summary
- Discuss future collaboration or knowledge transfer

**Responsible:** Program Lead + Communications

## **6. Learning & Internal Debrief**

- Conduct **internal reflection session** to capture:
  - What worked well
  - Challenges faced
  - Key outcomes achieved
  - Lessons for future projects
- Feed into:
  - Organizational knowledge hub
  - Strategic planning
  - M&E database and reporting templates

**Responsible:** Program + M&E + SMT



## **7. Reporting Format Summary**

<b>Report</b>	<b>Due By</b>	<b>Content</b>
Final Narrative Report	Within 30 days post-project	Activities, KPIs, case studies, testimonials
Final Financial Report	Within 30 days	Expenditure, UC, fund reconciliation
Asset Status Report	Within 45 days	Remaining assets, location, reassignment
MEL Summary or Evaluation Report	If required by donor or SMT	Data, outcome-level changes, feedback
Donor Acknowledgment & Closure Note	Within 45 days	Thank you letter with highlights

## **8. Risk Management**

During grant closure, GTS will proactively monitor for risks including:

- Incomplete documentation or reporting
- Disputes with vendors or consultants
- Delayed payments or tax compliance
- Unused inventory or equipment
- Lack of clarity on asset ownership

Any issues will be logged, escalated, and addressed via GTS's **Finance, Legal, or Ethics Committee**, as appropriate.

## **9. Compliance & Alignment**

This policy complies with:

- Grant Agreements and Donor SOPs
- Income Tax Act, 1961
- FCRA (if applicable)
- Indian NGO audit standards



- GTS's internal:
  - Financial Procedures Policy
  - Grant Expenditure Policy
  - Safeguarding, Ethics, and DEI Commitments

## **10. Policy Review**

This policy will be reviewed every **2 years** or after the completion of a major grant or institutional donor audit. Changes must be approved by the **SMT** and shared with all relevant teams.



# Going to School Procurement Policy

*Transparent | Accountable | Sustainable | Inclusive*

## 1. Introduction

This policy outlines how GTS procures goods and services in a **transparent, efficient, ethical, and environmentally responsible** manner. It ensures all procurement activities:

- Are **fair, competitive, and cost-effective**
- Uphold **child protection, sustainability, and DEI standards**
- Prevent corruption, favoritism, and waste
- Support GTS’s mission to serve children and communities with integrity

## 2. Purpose and Scope

This policy applies to:

- All procurement of goods, services, equipment, consultants, printing, transportation, and logistics
- All GTS teams, departments, consultants, and implementing partners
- All vendors, suppliers, and contractors engaged by GTS

## 3. Core Procurement Principles

Principle	What It Means
<b>Transparency</b>	All processes are documented, open, and audit-ready
<b>Fair Competition</b>	Vendors are selected based on merit, price, quality, and values alignment
<b>Best Value</b>	GTS chooses goods and services that offer quality and impact—not just lowest cost
<b>Sustainability</b>	Preference is given to suppliers using eco-friendly, ethical, and low-waste practices
<b>Accountability</b>	All procurement decisions are traceable, justified, and subject to oversight
<b>Inclusion</b>	Opportunities are shared with small, local, women-led, disabled-owned, or marginalized group vendors



#### 4. Vendor Eligibility and Vetting

Before contracting any vendor, GTS will:

- Conduct **due diligence** (registration, tax status, track record)
- Require vendors to sign:
  - **GTS Vendor Code of Conduct**
  - **Safeguarding & DEI Commitment**
  - **Green Procurement Compliance Form** (if applicable)
- Ensure vendors:
  - Are not blacklisted or involved in child labor or environmental violations
  - Have capacity to deliver quality services within deadlines

#### 5. Procurement Thresholds and Approvals

<b>Purchase Value</b>	<b>Requirements</b>
₹0 – ₹25,000	One quote and direct purchase with justification
₹25,001 – ₹100,000	Minimum two quotes; purchase approval by Program or Ops Head
₹100,001 – ₹500,000	Minimum three quotes; Procurement Committee review and comparative statement
₹500,001	Tender process or documented justification for exemption; Board/Director sign-off

**Emergency procurement** (e.g., urgent field requirement) can bypass these steps with formal written justification and post-approval.

#### 6. Standard Operating Procedure (SOP) for Procurement

##### 6.1. Procurement Planning

- Every quarter, programs and departments submit a **Procurement Forecast** aligned with approved budgets



## 6.2. Request and Approval

- Raise a **Purchase Requisition Form** (PRF)
- Ensure inclusion of specs, quantity, purpose, delivery timeline
- Send to Finance/Operations for validation against budget

## 6.3. Sourcing and Quotations

- Procurement Officer obtains quotes from eligible vendors
- Vendor evaluations use a **Comparative Statement** scoring price, quality, timeline, eco-compliance, past experience

## 6.4. Selection and Contracting

- Chosen vendor signs:
  - **Purchase Order (PO) or Contract Agreement**
  - GTS Code of Conduct and applicable policy declarations

## 6.5. Delivery and Quality Check

- Receiving department verifies goods/services with a **Goods Received Note (GRN)**
- Any issues reported within 48 hours

## 6.6. Invoice and Payment

- Vendor submits signed invoice and delivery proof
- Finance processes payment per agreed terms (15–30 days)

## 6.7. Documentation and Archiving

- All procurement records (PRF, quotations, evaluation, PO, GRN, invoice) filed and digitized
- Subject to periodic audit by internal and/or external auditors



## 7. Procurement Committee

The GTS Procurement Committee includes:

- Procurement or Operations Lead (Chair)
- Program Manager (user department)
- Finance Officer
- DEI or Sustainability Focal Point (optional, for high-value or sensitive procurements)

They review and approve purchases over ₹1,00,000 and resolve vendor disputes or red flags.

## 8. Green Procurement Guidelines

### 8.1. Environmental Criteria

- Preference to vendors who:
  - Use **recycled, biodegradable, low-impact materials**
  - Minimize plastic, foam, and non-compostable packaging
  - Have **energy-efficient production** or transport systems
  - Provide bulk orders to reduce transport footprint

### 8.2. Sustainable Printing

- Use **FSC-certified or recycled paper**
- Use **vegetable-based inks**, non-toxic adhesives
- Minimize lamination and unnecessary bulk

### 8.3. Ethical Merchandise and Gifts

- No synthetic swag or unnecessary giveaways
- Locally handmade, natural fiber-based, reusable items preferred
- GTS will never distribute plastic toys, branded water bottles, or vinyl banners



#### 8.4. Travel-Linked Procurement

- Book **train or shared transportation** where possible
- Offset carbon for flights over 500km
- Provide eco-friendly travel kits (cloth bags, refillable bottles, zero-waste supplies)

#### 8.5. Vendor Scoring (Optional)

GTS may add an **Eco-Compliance Score** during vendor evaluation, awarding up to 20% weight to environmental performance.

### 9. Conflict of Interest and Ethics

All procurement participants must:

- Disclose any personal or financial ties with vendors
- Refrain from accepting gifts or favors
- Sign GTS's **Conflict of Interest and Anti-Bribery Policy**

Breaches of procurement ethics may lead to disciplinary action or vendor disqualification.

### 10. Policy Review and Oversight

- Reviewed every **18 months** or upon legal/regulatory change
- Oversight by **Finance & Ethics Committee**
- Linked to annual audit processes and procurement performance evaluations
- Aligned with:
  - Child Protection Policy
  - Whistleblower Policy
  - Anti-Bribery & Fraud Policy
  - DEI and Green Commitment Statements

**Every rupee we spend reflects our mission. Through this Procurement Policy, GTS ensures that our decisions are ethical, equitable, transparent, and environmentally responsible—serving the children and communities we care for, without harming the planet we share.**



## **Going to School Digital Security Policy**

*Protecting Data | Safeguarding People | Securing Systems*

### **1. Introduction**

Digital technology powers how **Going to School (GTS)** delivers its mission—from field data collection to storytelling, donor communications, and internal collaboration. With this opportunity comes risk.

This **Digital Security Policy** outlines how GTS protects its digital systems, data, devices, and users—especially children, communities, and staff—against threats like data breaches, cyberattacks, surveillance, and unethical misuse.

The policy aligns with GTS's **Data Protection Policy for Minors, Child Safeguarding Policy**, and **Ethics & Integrity Framework**, and ensures compliance with Indian law and international standards.

### **2. Purpose**

This policy exists to:

- Protect **sensitive and personal data** collected, stored, or shared by GTS
- Prevent **unauthorized access**, loss, or misuse of GTS digital resources
- Guide all users in **safe and ethical digital practices**
- Comply with the **Information Technology Act, 2000**, and relevant Indian data protection rules
- Embed a **culture of digital hygiene, security, and accountability** across the organization

### **3. Scope and Applicability**

This policy applies to:

- All GTS employees, interns, consultants, and volunteers
- All devices and systems owned or used by GTS (phones, tablets, laptops, cloud storage)



- All external vendors, developers, and service providers with access to GTS systems
- All data collected from or shared with children, partners, donors, or the public
- Any digital activity conducted in GTS's name or using its infrastructure

#### **4. Core Principles**

- **Confidentiality:** Data and communications are protected from unauthorized access.
- **Integrity:** Data is accurate, complete, and not tampered with.
- **Availability:** Systems are reliably accessible to authorized users.
- **Accountability:** Everyone at GTS is responsible for secure digital behavior.
- **Minimalism:** Only essential data is collected and retained.
- **Consent:** Informed digital consent is obtained where applicable (especially with minors).

#### **5. Roles and Responsibilities**

<b>Role</b>	<b>Responsibility</b>
All Staff	Follow safe digital practices, report incidents
IT/Tech Lead	Enforce cybersecurity tools and protocols
Data Protection Officer (DPO)	Oversee digital data security and compliance
HR & Training	Induct staff in digital safety and review annually
External Partners	Comply with GTS digital security clauses and access limits

#### **6. Acceptable Use Guidelines**

All staff and collaborators must:

- Use **GTS-authorized devices and platforms** for official communication and data storage
- Use **strong, unique passwords** and change them every 90 days



- Use **multi-factor authentication (MFA)** for email, cloud storage, and CRM systems
- Access data only on **secure, password-protected Wi-Fi**
- Avoid using **personal devices** for storing sensitive data
- Log out of systems when not in use and lock devices in public spaces
- Use GTS-approved cloud tools (e.g., Google Workspace, encrypted folders)
- Use ethical digital behavior when representing GTS online or offline

## **7. Prohibited Digital Behaviors**

- Storing or sharing child data on WhatsApp, personal email, or USBs
- Downloading unapproved software or apps on GTS devices
- Uploading photos/videos of children to social media or third-party servers without consent
- Sharing passwords or device access with unauthorized users
- Using GTS digital systems for illegal or unethical activity
- Taking backups of program data onto personal devices without encryption or approval
- Using AI tools to process data without explicit consent and review

## **8. Data Protection and Storage**

- **All sensitive data** (program, finance, donor, child-related) must be:
  - Encrypted at rest and in transit
  - Stored only in GTS-approved cloud servers with role-based access
  - Retained only as long as necessary, per GTS's data retention schedule
- Child data must be **anonymized** when used in reports or presentations
- Devices used for child interviews or photos must be registered and signed out with supervision



- **Data collected in the field** must be uploaded and deleted from local devices within 48 hours

### **9. Third-Party Access and Vendor Security**

- Vendors and partners must:
  - Sign a **Digital Security & Data Protection Agreement**
  - Be reviewed for compliance with Indian IT rules and GDPR (if applicable)
  - Only access what is needed for contracted work
- GTS may conduct security audits or revoke access at any time if a breach is suspected

### **10. Incident Reporting and Breach Response**

- Any digital security incident (lost device, phishing, unauthorized access) must be reported to the DPO within **2 hours**
- The DPO will:
  - Investigate and assess the impact
  - Notify affected parties if needed
  - Take remedial steps (password resets, revoking access, reporting to authorities)
- Major incidents will be documented, reviewed, and shared with leadership and, where appropriate, donors or legal authorities

### **11. Training and Awareness**

- All staff and volunteers undergo **mandatory digital security training during induction**
- Annual refresher modules cover:
  - Phishing awareness
  - Password hygiene



- Secure cloud and mobile use
- Updates on evolving cyber threats
- Field teams receive **specialized guidance on collecting and storing child data safely**

## **12. Policy Review and Improvement**

- This policy is reviewed annually by the **IT and Ethics Team**, with input from the DPO and relevant external advisors
- Feedback from users and incidents will be used to:
  - Update protocols
  - Improve software and security layers
  - Adapt to new laws, threats, or technologies

## **13. Alignment with Other GTS Policies**

This policy is implemented in tandem with:

- **Data Protection Policy for Minors**
- **Child Protection & Safeguarding Policy**
- **Whistleblower Policy**
- **Code of Conduct**
- **Ethics and Integrity Framework**
- **Volunteer Engagement Policy**

GTS is committed to safeguarding not only children and communities in person, but also their digital identities, stories, and data. Through this policy, we protect the trust placed in us—and build a digital culture that reflects our ethics, responsibility, and vision.



# Going to School Sustainability Policy

*Go Green | Think Regeneratively | Act on Climate*

## **1. Introduction**

At Going to School (GTS), we believe that climate action and sustainability are core responsibilities—not just environmental concerns, but matters of educational inputs for us all, climate change actions, solutions, intergenerational equity, and program integrity.

This policy sets forth our commitment to making sustainable, ethical, and climate-positive decisions in every area of our work: from the stories we tell to the way we travel, print, procure, and engage.

Children today inherit the decisions we make now. As storytellers, educators, and creators, we aim to lead by example, ensuring that sustainability is woven into our culture, curriculum, logistics, and leadership.

## **2. Purpose**

This policy aims to:

- Define GTS's sustainability values and climate-conscious priorities
- Guide operational, programmatic, creative, and procurement decisions
- Promote regenerative practices
- Educate children and communities on sustainability through lived experience and storytelling
- Monitor, evaluate, and reduce our carbon and environmental footprint

## **3. Scope and Applicability**

This policy applies to:

- All staff, partners, freelancers, vendors, interns, and volunteers
- All program sites, offices, schools, field visits, events, and productions
- All processes and decisions related to content development, production, printing, travel, food, logistics, and procurement



- All GTS stories, toolkits, and educational content shared with children and youth

## **4. Core Principles**

### **4.1 Environmental Climate change actions, solutions**

Children in vulnerable communities are disproportionately affected by climate change. Our work must reduce harm, redistribute voice, and build resilience.

### **4.2 Low-Carbon Operations**

We strive to reduce emissions, waste, and pollution across all our systems—fieldwork, office, travel, and logistics.

### **4.3 Sustainable Storytelling**

We integrate sustainability and climate change actions, solutions into our media, messages, and content frameworks.

### **4.4 Education for Planetary Futures**

We view climate literacy and green skills as essential to 21st-century education and entrepreneurship.

## **5. Key Sustainability Commitments**

### **5.1 Content and Education**

- Communicate the potential of young people to design solutions to Climate Change by starting sustainable enterprises and creating jobs for low-income communities while solving for the biggest challenge of our time for everyone around them.

### **5.2 Green Procurement**

- Source materials from recycled, compostable, or sustainable origins wherever possible
- Select local vendors and low-footprint alternatives to reduce transport emissions
- Avoid single-use plastics, PVC packaging, and non-recyclable materials in all deliveries and productions



- Require vendors to adhere to GTS's Green Procurement Guidelines and sign an eco-commitment form

### **5.3 Print and Production**

- Print only what is essential
- Use recycled or FSC-certified paper, vegetable-based inks, and eco printers
- Design for reuse and upcycling: content kits, bags, and displays made from durable and natural materials
- Eliminate foam boards, vinyl banners, and laminated merchandise

### **5.4 Travel and Logistics**

- Prioritize public transport, trains, shared mobility, and non-motorized travel when feasible
- Use teleconferencing and digital collaboration as primary options
- Pack and deliver project kits using recycled, minimal, and biodegradable packaging

### **5.5 Office and Infrastructure**

- Reduce electricity usage by turning off lights, ACs, and devices when not in use
- Reuse stationery, storage materials, and electronics
- Encourage waste segregation, composting, and refill systems for office supplies
- Source cleaning materials that are non-toxic and environmentally safe

## **6. Monitoring, Evaluation & Reporting**

- GTS will measure its environmental footprint annually (paper usage, travel emissions, plastic output)
- Programs will track environmental impact metrics alongside education and skills outcomes
- Annual impact reports will include green practices, challenges, and success stories



## 7. Responsibilities

Role	Sustainability Duties
All GTS Staff	Follow sustainability practices daily; reduce waste; offer feedback
Content Teams	Integrate environmental themes and avoid unsustainable visuals
Procurement Team	Apply green criteria in vendor and materials selection
Program Teams	Model eco-choices in community and school settings
Vendors & Partners	Sign sustainability commitments and align practices
Children & Youth	Learn, question, innovate, and act on climate through participation

## 8. Partnerships and Collaboration

GTS commits to partnering with

- Schools and governments promoting green campuses and eco-clubs
- Innovators in sustainable technology, farming, and education
- Creators who design content for planet-positive learning

## 9. Policy Review and Evolution

This policy is:

- Reviewed every 12 months
- Updated based on feedback, field learning, and climate developments
- Revised in consultation with climate scientists, child-rights advocates, and community voices

Going to School will continue to learn, evolve, and lead by making climate-positive choices that honor the earth, respect the future, and empower the next generation to inherit a livable planet.