

# CHILD PROTECTION POLICY

## PUPPETS PICTURE EDUCATION TRUST

**Registered Office:** Plot No – M10, M block, Sector – 11, Near Metro Heart Hospital, Noida, 201301

**Date of Adoption:** 15-Dec-2025

**Resolution No.:** 6

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### PREAMBLE

Puppets Picture Education Trust (“the Trust”) is a public charitable trust dedicated to educational and social development objectives. In the course of fulfilling its mission, the Trust engages with children — including students, participants, and beneficiaries of its educational programs and activities.

The Trust recognizes that every child has the fundamental and inalienable right to safety, protection, dignity, and a life free from abuse, neglect, exploitation, and harm. The Trust believes that the protection of children is not merely a legal obligation but a moral and institutional imperative.

The Board of Trustees, comprising **Mr. Rahul Chakraborty** and **Mr. Arun Chakraborty**, adopts this Child Protection Policy (“CPP” or “Policy”) to establish a clear organizational framework for the prevention, detection, reporting, and response to any form of child abuse, neglect, or exploitation in connection with the Trust’s operations, programs, and activities.

This Policy is guided by the United Nations Convention on the Rights of the Child (UNCRC), 1989 — in particular Article 19, which calls upon all institutions to protect children from all forms of physical or mental violence, injury, abuse, neglect, maltreatment, or exploitation — and the comprehensive child protection legal framework of India.

The Trust maintains a **zero-tolerance approach** towards any form of child abuse, neglect, or exploitation. Any violation of this Policy shall be dealt with swiftly, firmly, and in accordance with applicable law.

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## ARTICLE 1 — OBJECTIVES

**1.1** To create and maintain a safe, nurturing, and protective environment for all children who participate in, benefit from, or come into contact with the Trust’s programs, activities, and operations.

**1.2** To clearly define what constitutes child abuse, neglect, exploitation, and harm in the context of the Trust’s work.

**1.3** To establish standards of conduct and behaviour expected of all persons associated with the Trust in their interactions with children.

**1.4** To create robust, accessible, and confidential mechanisms for the reporting, investigation, and resolution of child protection concerns.

**1.5** To ensure compliance with all applicable child protection laws of India, including the Protection of Children from Sexual Offences Act, 2012 (POCSO Act), the Juvenile Justice (Care and Protection of Children) Act, 2015 (JJ Act), the Right of Children to Free and Compulsory Education Act, 2009 (RTE Act), the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 (as amended in 2016), the Prohibition of Child Marriage Act, 2006, the Information Technology Act, 2000, the Bharatiya Nyaya Sanhita, 2023, the Constitution of India (Articles 14, 15, 21, 21A, 23, 24, 39, and 45), and all applicable state-specific child protection laws and rules.

**1.6** To foster a culture of awareness, vigilance, and accountability on child protection among all persons associated with the Trust.

**1.7** To ensure that the **best interests of the child** are the primary consideration in all decisions and actions taken under this Policy.

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## ARTICLE 2 — DEFINITIONS

**2.1 “Child”** means any person below the age of eighteen (18) years, regardless of gender, nationality, caste, religion, ethnicity, disability, or any other status.

**2.2 “Trust”** means Puppets Picture Education Trust.

**2.3 “Board”** means the Board of Trustees, presently comprising Mr. Rahul Chakraborty and Mr. Arun Chakraborty.

**2.4 “Representative”** means any person acting on behalf of, or in association with, the Trust, including all Trustees, employees (full-time, part-time, contractual, or temporary), consultants, facilitators, trainers, educators, volunteers, interns, vendors, service providers, photographers, videographers, visitors, donors visiting programs, partner organization staff operating in connection with the Trust’s programs, and any other individual who has direct or indirect contact with children through the Trust’s activities.

**2.5 “Child Abuse”** means all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment, commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development, or dignity, in the context of a relationship of responsibility, trust, or power. (Source: World Health Organization, 1999)

**2.6 “Physical Abuse”** means the intentional use of physical force against a child that results in, or has a high likelihood of resulting in, harm to the child’s health, survival, development, or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, pinching, hair-pulling, slapping, pushing, corporal punishment of any form (including but not limited to duck-walking, holding ears, standing in the sun, removal of clothing as punishment), and any other act of physical violence.

**2.7 “Emotional Abuse”** means a persistent pattern of behaviour that damages or substantially reduces the child’s emotional, psychological, or social well-being and development. This includes belittling, denigrating, threatening, intimidating, humiliating, ridiculing, scapegoating, isolating, ignoring, rejecting, comparing unfavourably, using sarcasm, using abusive or demeaning language, discriminating, restricting movement, and any other form of non-physical hostile or rejecting treatment.

**2.8 “Sexual Abuse”** means any act or behaviour that constitutes a sexual offence under the Protection of Children from Sexual Offences Act, 2012 (POCSO Act), as amended from time to time. This includes penetrative sexual assault (including rape), non-penetrative sexual assault (including touching the private parts of a child), sexual harassment (including making sexually coloured remarks, stalking, showing pornography to a child, making a child exhibit his/her body), using a child for pornographic purposes (including storing pornographic material involving a child), and any abetment of or attempt to commit any of the above offences. Under the POCSO Act, sexual offences committed by persons in a position of trust or authority (including persons working in educational institutions or organizations dealing with children) are treated as **aggravated offences** and are subject to more stringent punishment.

**2.9 “Neglect”** means the failure to provide for the basic needs and well-being of a child when one is in a position of responsibility to do so, including failure to ensure the child’s safety, health, nutrition, education, supervision, or emotional care. In the Trust’s context, neglect includes failure to treat every child equally and respectfully, failure to provide adequate supervision during activities, and failure to respond to a child in distress.

**2.10 “Exploitation”** means the use of a child for the benefit of others in a manner that is detrimental to the child’s physical or mental health, education, or development. This includes child labour, commercial exploitation, use of a child for begging, using a child’s image or story for fundraising without proper consent and safeguards, and any other form of exploitation.

**2.11 “Bullying”** means repeated aggressive, intimidating, or harmful behaviour by one or more persons towards a child, including physical bullying, verbal bullying, social or relational bullying (exclusion, rumour-spreading), and cyberbullying (harassment through electronic means).

**2.12 “POCSO Act”** means the Protection of Children from Sexual Offences Act, 2012 (as amended in 2019).

**2.13 “JJ Act”** means the Juvenile Justice (Care and Protection of Children) Act, 2015 (as amended).

**2.14 “CWC”** means the Child Welfare Committee constituted under the JJ Act.

**2.15 “SJPU”** means the Special Juvenile Police Unit established under the POCSO Act.

**2.16 “CHILDLINE”** means the CHILDLINE India Foundation helpline (1098), a 24-hour emergency service for children in distress.

**2.17 “Child Protection Officer” or “CPO”** means the person designated by the Board under this Policy to receive and act upon child protection concerns.

**2.18 “Child Protection Committee” or “CPC”** means the committee constituted under this Policy to oversee the implementation of the CPP.

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## **ARTICLE 3 — SCOPE AND APPLICABILITY**

**3.1** This Policy applies to **all Representatives** of the Trust, without exception, regardless of their designation, seniority, tenure, or nature of engagement.

**3.2** This Policy applies to **all children** who participate in, benefit from, or come into contact with the Trust’s programs, events, activities, workshops, camps, field visits, or any other initiative, whether conducted at the Trust’s premises, at any external venue, at schools, in communities, online or through digital platforms, or during transportation arranged by the Trust.

**3.3** This Policy applies to all interactions with children, whether in-person, online, telephonic, or through any other medium.

3.4 This Policy is to be read in conjunction with the Trust's **Conflict of Interest Policy** and **Anti-Fraud and Anti-Corruption Policy**.

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## ARTICLE 4 — GUIDING PRINCIPLES

**4.1 Best Interests of the Child:** In all actions, decisions, and proceedings concerning a child under this Policy, the **best interests of the child** shall be the primary consideration.

**4.2 Zero Tolerance:** The Trust maintains zero tolerance towards any form of child abuse, neglect, or exploitation. No justification — cultural, customary, religious, disciplinary, or otherwise — shall be accepted for any act that harms or endangers a child.

**4.3 Non-Discrimination:** Every child shall be treated with equal respect and dignity, without discrimination on the basis of gender, caste, religion, ethnicity, language, disability, socio-economic status, appearance, academic performance, or any other factor.

**4.4 Participation:** Children shall be heard and their views given due weight in accordance with their age and maturity, in all matters that affect them.

**4.5 Confidentiality:** The identity and personal information of a child who is a victim or a subject of a child protection concern shall be kept strictly confidential, and shall only be disclosed to persons who legitimately need to know, in accordance with law.

**4.6 Do No Harm:** The Trust and its Representatives shall take all reasonable steps to ensure that their actions do not cause harm to children, and that the Trust's programs and activities are designed and implemented with child safety as a priority.

**4.7 Accountability:** Every Representative is personally accountable for the safety and protection of children they interact with through the Trust.

**4.8 Mandatory Reporting:** Under Section 19 of the POCSO Act, every person who has knowledge or apprehension that a sexual offence has been committed against a child is **mandatorily required** to report it to the local police or the Special Juvenile Police Unit (SJPU). Failure to report is a criminal offence punishable under Section 21 of the POCSO Act.

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## **ARTICLE 5 — CODE OF CONDUCT FOR REPRESENTATIVES**

### **5A — Expected Behaviour**

All Representatives of the Trust shall:

**5A.1** Treat every child with empathy, respect, and dignity, regardless of the child’s gender, caste, religion, ethnicity, language, disability, socio-economic status, appearance, or academic ability.

**5A.2** Listen to children, value their views, and take their concerns seriously.

**5A.3** Use language that is age-appropriate, respectful, encouraging, and non-discriminatory in all interactions with children.

**5A.4** Ensure that physical contact with children, if any, is minimal, appropriate, non-intrusive, respectful, and only as necessary for the legitimate purpose of the activity (e.g., first aid). Physical contact must always be in the presence of another adult.

**5A.5** Ensure that children are supervised at all times during Trust activities, with at least two adults present wherever possible (the “two-adult rule”).

**5A.6** Be vigilant for signs of abuse, distress, or harm among children and report any concern immediately in accordance with this Policy.

**5A.7** Respect the privacy and confidentiality of children’s personal information, stories, images, and circumstances.

**5A.8** Obtain informed consent from the child and the child’s parent/guardian before taking photographs, videos, or recordings of children, or using a child’s name, image, or story for any purpose (including communications, fundraising, or social media).

**5A.9** Create and maintain an atmosphere that fosters the safety, well-being, and positive development of children.

**5A.10** Attend all child protection training and awareness sessions conducted by the Trust.

**5A.11** Comply with all applicable child protection laws and the provisions of this Policy.

### **5B — Prohibited Behaviour**

No Representative of the Trust shall:

**5B.1** Use any form of corporal punishment, physical violence, or physical force against a child for any reason, including as a disciplinary measure.

**5B.2** Use language or behaviour towards a child that is abusive, threatening, intimidating, demeaning, humiliating, discriminatory, sexually suggestive, or otherwise inappropriate.

**5B.3** Engage in, facilitate, encourage, or condone any form of sexual abuse, sexual harassment, or sexual exploitation of a child. This includes touching a child's private parts, making sexually coloured remarks, showing pornography or inappropriate content to a child, engaging in sexual acts in the presence of a child, and any other act that constitutes a sexual offence under the POCSO Act.

**5B.4** Isolate a child or be alone with a child in a closed, private, or unsupervised setting. All interactions with children must take place in open, visible, and supervised environments.

**5B.5** Develop any inappropriate personal, emotional, romantic, or sexual relationship with a child.

**5B.6** Share with or show children any inappropriate, obscene, violent, sexually explicit, or harmful content — whether in physical or digital form.

**5B.7** Provide alcohol, tobacco, drugs, or any intoxicating substance to a child, or use such substances while interacting with children.

**5B.8** Engage in or encourage bullying, hazing, ragging, or any form of peer violence among children.

**5B.9** Discriminate against any child on any ground, including but not limited to gender, caste, religion, disability, economic status, or academic performance.

**5B.10** Use a child for any form of labour, commercial activity, begging, or personal errand.

**5B.11** Take a child to their personal residence or any private location without the express written consent of the child's parent/guardian and the prior knowledge of the Child Protection Officer.

**5B.12** Exchange personal contact information (personal phone numbers, social media accounts, personal email addresses) with children for non-official purposes, or communicate privately with children through personal channels.

**5B.13** Take photographs, videos, or recordings of children without proper consent, or take images that could be embarrassing, degrading, or harmful to the child.

**5B.14** Publish, share, or post any photograph, video, name, or personal information of a child on social media, websites, or any platform without proper consent and safeguards, and in violation of the child’s dignity or privacy.

**5B.15** Ignore, dismiss, or fail to act upon any knowledge, suspicion, or concern of child abuse, neglect, or exploitation.

**5B.16** Retaliate against, punish, or intimidate any child, colleague, or other person who reports a child protection concern.

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## **ARTICLE 6 — SAFE RECRUITMENT AND ONBOARDING**

**6.1 Background Verification:** Before engaging any employee, volunteer, consultant, or other Representative who will have direct contact with children, the Trust shall conduct reasonable background verification, which may include verification of identity documents and educational qualifications, criminal record check (to the extent legally permissible and practically feasible), reference checks from previous employers or organizations, and a self-declaration by the individual regarding any past criminal convictions, pending criminal cases, or involvement in child abuse or exploitation.

**6.2 Self-Declaration:** Every Representative shall, at the time of engagement, sign a **Self-Declaration** (in the format annexed as **Annexure A**) confirming that they have no criminal record or pending case related to child abuse or any offence against children, they have read, understood, and agree to comply with this Policy, and they understand that any violation may result in disciplinary action, termination, and/or referral to law enforcement.

**6.3 Induction Training:** Every new Representative who will interact with children shall receive mandatory child protection induction training within **15 days** of their engagement. This training shall cover the key provisions of this Policy, the types of child abuse and how to recognize warning signs, the Code of Conduct, the reporting mechanism, the relevant provisions of the POCSO Act and other child protection laws, and the consequences of violation.

**6.4 Ongoing Training:** The Trust shall conduct periodic refresher training on child protection for all Representatives at least once every financial year.

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# **ARTICLE 7 — SAFE PROGRAMMING AND OPERATIONS**

## **7A — Physical Safety**

**7A.1** All premises, venues, and locations where the Trust conducts activities involving children shall be safe, clean, well-lit, and well-ventilated.

**7A.2** Separate and clean toilet facilities for girls and boys shall be ensured at all activity venues.

**7A.3** A fully equipped first-aid kit shall be available at every activity venue, and at least one person trained in basic first aid shall be present.

**7A.4** Fire safety, emergency exits, and emergency response procedures shall be in place at all venues where activities with children are conducted.

**7A.5** The premises shall be secured to prevent unauthorized entry and to ensure that no child leaves the premises unescorted during activities.

## **7B — Transportation Safety**

**7B.1** When the Trust arranges transportation for children, the vehicle shall be legally registered, insured, and in safe and roadworthy condition, the driver shall possess a valid driving license for the category of vehicle and shall be a verified and trusted person, at least one Representative of the Trust shall accompany the children during transport, a parent/guardian shall be informed of and consent to the transportation arrangement, and the driver shall follow all traffic rules and regulations.

## **7C — Digital and Online Safety**

**7C.1** All online activities, virtual sessions, and digital communications involving children shall be conducted on secure and appropriate platforms.

**7C.2** Online sessions involving children shall be supervised by at least two adults.

**7C.3** No Representative shall record online sessions involving children without prior consent.

**7C.4** Children's personal data collected digitally shall be stored securely and accessed only by authorized persons.

**7C.5** The Trust shall take reasonable measures to protect children from cyberbullying, online grooming, and exposure to inappropriate online content during Trust-related activities.

## **7D — Use of Children’s Images and Stories**

**7D.1** Informed written consent must be obtained from the child’s parent/guardian (and from the child, where age-appropriate) before the child’s photograph, video, name, or story is used for any purpose, including communications, publications, reports, social media, fundraising, or advocacy.

**7D.2** All images and stories of children used by the Trust must portray children with dignity and respect, and must not be exploitative, sensational, or harmful to the child.

**7D.3** Full names and identifying details (such as exact location or school name) of children shall not be published alongside their photographs unless there is a specific, justified, and consented reason to do so.

**7D.4** Images of children in vulnerable, distressing, or undignified situations shall never be used.

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## **ARTICLE 8 — CHILD PROTECTION COMMITTEE AND CHILD PROTECTION OFFICER**

### **8.1 Child Protection Committee (CPC)**

The Board shall constitute a **Child Protection Committee (CPC)** to oversee the implementation of this Policy. The CPC shall comprise a minimum of **3 (three) members**, including at least one Trustee, at least one senior employee or program head (if applicable), and at least one external member (such as a child rights professional, social worker, counsellor, or legal practitioner with expertise in child protection).

The Board shall endeavour to ensure a gender-balanced composition of the CPC. The CPC shall meet at least once every **six (6) months** and additionally as required in response to any reported incident.

### **8.2 Roles of the CPC**

The CPC shall oversee the implementation and monitoring of this Policy across all programs and activities, receive, review, and guide the resolution of child protection complaints and concerns reported to the CPO, advise the Board on measures to strengthen child safety, conduct or commission periodic risk assessments of the Trust’s programs and activities from a child safety perspective, review and update this Policy annually or as required, and ensure that all Representatives receive adequate training on child protection.

### **8.3 Child Protection Officer (CPO)**

The Board shall designate a **Child Protection Officer (CPO)** who shall serve as the primary point of contact for all child protection concerns. The CPO shall be a person of integrity, sensitivity, and good judgment. The CPO may be a Trustee, a senior employee, or an external professional.

**Designated Child Protection Officer:**

Name: **[Insert Name]**

Email: **[Insert Email]**

Phone: **[Insert Phone Number]**

**8.4 Roles of the CPO**

The CPO shall receive and record all reports and complaints of child abuse, neglect, or exploitation, take immediate steps to ensure the safety of the child, conduct or coordinate preliminary inquiries, refer matters to the CPC and/or the Board as appropriate, ensure mandatory reporting to law enforcement and statutory authorities as required under the POCSO Act and other laws, maintain confidential records of all reports and actions taken, serve as the liaison between the Trust and statutory authorities (police, CWC, SJPU, CHILDLINE), support and guide the child and the child’s family/guardian through the process, and maintain the confidentiality and dignity of the child at all times.

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**ARTICLE 9 — RECOGNIZING SIGNS OF ABUSE**

All Representatives shall be trained to recognize the potential indicators of child abuse. While the presence of one or more indicators does not necessarily confirm abuse, they should prompt concern and further inquiry.

**9.1 Potential Signs of Physical Abuse**

Unexplained bruises, burns, cuts, welts, or fractures. Injuries inconsistent with the explanation given. Fear of a particular adult or reluctance to go home. Flinching at sudden movements. Wearing concealing clothing inappropriate for the weather.

**9.2 Potential Signs of Emotional Abuse**

Sudden changes in behaviour or mood. Withdrawal, excessive shyness, or fear. Low self-esteem, self-deprecation, or extreme need for approval. Regressive behaviour (bed-wetting, thumb-sucking in older children). Excessive anxiety, depression, or aggression.

**9.3 Potential Signs of Sexual Abuse**

Age-inappropriate sexual knowledge or behaviour. Reluctance to be alone with a particular person. Sudden onset of nightmares or sleep disturbances. Withdrawal, secrecy, or sudden behavioural changes. Physical symptoms (difficulty walking, pain, bruising in genital area). Fear, anxiety, or distress without obvious cause.

#### **9.4 Potential Signs of Neglect**

Consistently poor hygiene, unkempt appearance, or inappropriate clothing. Chronic hunger or fatigue. Frequent absences from school or activities. Untreated medical or dental problems. Lack of supervision appropriate to the child's age.

#### **9.5 Potential Signs of Bullying**

Reluctance to attend activities. Unexplained injuries. Withdrawal from peers. Damaged or missing belongings. Sudden decline in academic performance or participation.

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## **ARTICLE 10 — REPORTING MECHANISM**

### **10.1 Duty to Report**

Every Representative has an **absolute and non-negotiable duty** to report any known, suspected, or apprehended incident of child abuse, neglect, or exploitation — whether committed by another Representative, by any third party, or by any person — to the Child Protection Officer (CPO) **immediately and without delay**.

Under Section 19 of the POCSO Act, any person who has knowledge or apprehension that a sexual offence has been or is likely to be committed against a child is mandatorily required to report it to the local police or the SJPU. **Failure to report is a criminal offence** punishable with imprisonment of up to six months, or fine, or both, under Section 21 of the POCSO Act.

### **10.2 How to Report**

**Internal Report:** Any child protection concern shall be reported to the CPO immediately, by any of the following means:

- In person
- By phone call to: **9818941087**
- By email to: **puppetspicture@gmail.com**
- In writing, using the **Child Protection Incident Report Form** (Annexure B)

**Report by a Child:** The Trust shall ensure that children are informed, in age-appropriate language, of their right to report any concern and the mechanism for doing so. Children

may report directly to the CPO, to any trusted Representative, or through CHILDLINE 1098.

**Anonymous Report:** Reports may be submitted anonymously. While identified reporting is encouraged for effective investigation, anonymous reports shall be received and acted upon.

**External / Statutory Report:** In cases involving sexual abuse or any offence under the POCSO Act, the CPO or any person with knowledge of the offence shall immediately report the matter to the local police (SHO), Special Juvenile Police Unit (SJPU), or CHILDLINE (1098), as mandated by law.

### **10.3 Timeline for Reporting**

**Internal Report:** All concerns must be reported to the CPO within **24 hours** of the concern arising.

**Statutory Report (POCSO):** Sexual offences against children must be reported to the police/SJPU **immediately** and in any case within **24 hours**, as required under Section 19 of the POCSO Act.

### **10.4 Content of Report**

To the extent possible, the report should include the name and details of the child (age, gender, school/class), the nature of the concern or incident, date, time, and location of the incident, name and details of the alleged offender (if known), names of any witnesses, the reporter's relationship to the child, and any immediate action already taken to ensure the child's safety. A standardized **Child Protection Incident Report Form** is provided as **Annexure B**.

### **10.5 Protection of the Reporter**

No person shall face punishment, retaliation, intimidation, discrimination, or adverse action of any kind for making a good-faith report of a child protection concern under this Policy. Any act of retaliation against a reporter shall itself be treated as a serious violation of this Policy. Making a **false or malicious report** with the intent to defame or harm another person is a punishable offence under Section 22 of the POCSO Act and shall also constitute a violation of this Policy.

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## **ARTICLE 11 — RESPONSE AND INVESTIGATION PROCEDURE**

### **11.1 Immediate Response**

Upon receiving a report of a child protection concern, the CPO shall take the following immediate steps:

**Step 1 — Ensure Child Safety:** The first and paramount priority is to ensure the immediate safety and well-being of the child. If the child is in immediate danger, the CPO shall take all necessary steps to remove the child from the situation or to remove the alleged offender from proximity to the child.

**Step 2 — Support the Child:** Listen to the child calmly and with empathy. Do not pressure, blame, or repeatedly question the child. Reassure the child that they have done the right thing by speaking up and that the situation is not their fault. Do not make promises that cannot be kept, but assure the child that help will be provided.

**Step 3 — Medical Attention:** If the child requires medical attention, arrange for immediate and appropriate medical care.

**Step 4 — Record the Report:** Document the report using the Child Protection Incident Report Form (Annexure B). Record the child's account in their own words, without interpretation or alteration.

**Step 5 — Inform the CPC and Board:** The CPO shall inform the Child Protection Committee and the Board of Trustees before the close of the day on which the report is received.

**Step 6 — Statutory Reporting:** If the concern involves sexual abuse or any offence under the POCSO Act, the CPO shall **immediately** report the matter to the local police/SJPU/CHILDLINE. No internal discussion or investigation should delay the mandatory statutory report.

**Step 7 — Suspend the Alleged Offender:** If the alleged offender is a Representative of the Trust, they shall be **immediately suspended** from all duties and removed from any contact with children, pending investigation. This suspension is a precautionary measure and not a finding of guilt.

**Step 8 — Inform Parents/Guardians:** The parents or guardians of the child shall be informed of the incident with sensitivity, unless the parent/guardian is the alleged offender, in which case the matter shall be referred to the CWC.

## 11.2 Investigation

**Internal Inquiry:** For concerns that do not constitute criminal offences (e.g., inappropriate language, minor Code of Conduct violations), the CPC shall conduct an internal inquiry and take appropriate action.

**Criminal Matters:** For concerns involving criminal offences (sexual abuse, physical violence causing injury, trafficking, etc.), the Trust shall fully cooperate with law

enforcement authorities and shall not conduct any parallel investigation that could interfere with the police investigation.

**Timeline:** Internal inquiries shall be completed within **30 (thirty) days**. Statutory investigations are subject to the timelines prescribed by law.

**Natural Justice:** The alleged offender shall be informed of the allegations and given a reasonable opportunity to respond, subject to the overriding priority of child safety and the requirements of law enforcement.

### **11.3 Confidentiality**

The identity of the child victim, the reporter, and the details of the incident shall be kept **strictly confidential** and disclosed only to persons who need to know for the purpose of investigation, response, or statutory reporting. Under Section 23 of the POCSO Act, disclosure of the identity of a child victim to the media or public is a punishable offence.

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## **ARTICLE 12 — CONSEQUENCES OF VIOLATION**

### **12.1 For Representatives**

Any Representative found to have violated this Policy — whether through commission of an act of abuse, failure to report, failure to act, complicity, or any other breach — shall be subject to appropriate consequences, which may include verbal or written warning (for minor Code of Conduct breaches), mandatory counselling and retraining, suspension from duties, termination of employment or engagement, blacklisting from any future association with the Trust, reporting to law enforcement authorities for criminal prosecution, and civil legal action for recovery of damages.

### **12.2 For Criminal Offences**

In cases involving criminal offences against children, the Trust shall report the matter to law enforcement authorities without exception and shall cooperate fully with the investigation and prosecution.

### **12.3 For Failure to Report**

Any Representative who fails to report a known or suspected child protection concern, or who suppresses, conceals, or delays reporting, shall face disciplinary action, up to and including termination. Under Section 21 of the POCSO Act, failure to report a sexual offence against a child is punishable with imprisonment of up to six months, or fine, or both.

## **12.4 For False/Malicious Reports**

Any person who makes a knowingly false or malicious report under this Policy shall be subject to disciplinary action. Under Section 22 of the POCSO Act, making a false complaint regarding a sexual offence against a child is punishable with imprisonment of up to six months, or fine, or both. This provision shall not, however, discourage genuine good-faith reporting.

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## **ARTICLE 13 — COUNSELLING AND SUPPORT FOR THE CHILD**

**13.1** The Trust shall, where necessary and feasible, arrange or facilitate access to professional counselling and psychosocial support for the affected child.

**13.2** Counselling shall be age-appropriate, trauma-informed, and conducted by a qualified and sensitive professional.

**13.3** Guidelines for those providing initial support to the child: approach the child calmly, patiently, and with empathy; let the child speak in their own words without leading or suggestive questions; do not ask the child to repeat or relive the experience multiple times; reassure the child that the situation is not their fault; do not make judgments, express shock or disbelief, or blame the child; do not make promises that cannot be kept; and involve a trusted adult from the child's support system where appropriate.

**13.4** The Trust shall seek the assistance of professional organizations and helplines such as CHILDLINE (1098) and local child rights organizations for guidance and support.

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## **ARTICLE 14 — INTERACTION WITH STATUTORY AUTHORITIES**

**14.1** The Trust shall maintain a directory of relevant statutory authorities and support services, including the local police station (SHO), Special Juvenile Police Unit (SJPU), District Child Welfare Committee (CWC), District Child Protection Unit (DCPU), CHILDLINE (1098), and local child rights NGOs and counselling services.

**14.2** The CPO shall serve as the Trust's liaison with statutory authorities in all matters related to child protection.

**14.3** The Trust and its Representatives shall cooperate fully with all investigations, proceedings, and inquiries conducted by law enforcement, the CWC, or any other statutory authority.

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## **ARTICLE 15 — RECORD-KEEPING**

**15.1** The Trust shall maintain confidential records of all child protection reports, inquiries, investigations, actions, and outcomes.

**15.2** All records shall be stored securely (physically in locked storage and/or digitally with password protection and restricted access) and shall only be accessible to the CPO, the CPC, and the Board.

**15.3** Records shall be retained for a minimum period of **10 (ten) years** or until the child attains the age of 25 years, whichever is later, or such longer period as may be required by law.

**15.4** The Trust shall maintain a **Child Protection Register** logging all incidents, reports, and actions.

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## **ARTICLE 16 — ANNUAL REVIEW AND MONITORING**

**16.1** This Policy shall be reviewed by the Board of Trustees, in consultation with the CPC, at least once every financial year.

**16.2** The annual review shall assess whether any child protection incidents were reported during the year and their outcome, the adequacy and effectiveness of prevention measures and safeguards, compliance with training requirements, whether the CPC and CPO are functioning effectively, any changes in applicable law or best practices that require amendments to this Policy, and feedback from children, parents, and Representatives (where appropriate).

**16.3** The CPC shall prepare an annual report on the implementation of this Policy and submit it to the Board.

**16.4** The findings of the annual review shall be recorded in the minutes of the Board meeting.

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## **ARTICLE 17 — RELATIONSHIP WITH OTHER POLICIES AND LAWS**

**17.1** This Policy shall be read in conjunction with the Trust's **Conflict of Interest Policy** and **Anti-Fraud and Anti-Corruption Policy**, and any other governance policies adopted by the Board.

**17.2** This Policy supplements and does not replace any obligation imposed by applicable law. Where any applicable law imposes a stricter standard, the stricter standard shall prevail.

**17.3** In the event of any conflict between this Policy and applicable law, the provisions of the applicable law shall prevail.

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## **ARTICLE 18 — AMENDMENT**

**18.1** This Policy may be amended by a resolution of the Board of Trustees, in consultation with the CPC.

**18.2** Any amendment shall be communicated to all Representatives and shall take effect from the date specified in the resolution.

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## **ARTICLE 19 — ADOPTION**

This Child Protection Policy has been read, discussed, and unanimously adopted by the Board of Trustees of Puppets Picture Education Trust at its meeting held on **[Date]**, vide Resolution No. **[Number]**.

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**Mr. Rahul Chakraborty**  
Trustee  
Puppets Picture Education Trust

Date: 15-Dec-2015

Signature: 

**Mr. Arun Chakraborty**  
Trustee  
Puppets Picture Education Trust

Date: 15-Dec-2015

Signature: 

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## ANNEXURE A

### SELF-DECLARATION AND UNDERTAKING

I, the undersigned, hereby declare and undertake as follows:

1. I have received, read, and understood the Child Protection Policy of Puppets Picture Education Trust.
2. I agree to abide by all the provisions of the Policy, including the Code of Conduct for Representatives, during the entire period of my association with the Trust.
3. I understand that any violation of this Policy may result in disciplinary action, including termination of my engagement with the Trust and referral to law enforcement authorities.
4. I declare that I have **no criminal record or pending criminal case** related to child abuse, sexual offence, violence, exploitation, or any offence against a child, in any jurisdiction.
5. I declare that I have **never been dismissed, terminated, or asked to resign** from any previous employment or engagement on grounds related to child abuse, misconduct with children, or violation of any child protection policy.
6. I declare that I have **no history** of any civil or disciplinary proceedings related to child abuse, neglect, or exploitation.
7. I understand my **mandatory legal obligation** under Section 19 of the POCSO Act to report any knowledge or apprehension of a sexual offence against a child, and that failure to report is a criminal offence.

8. I understand that all information regarding children that I may access in the course of my association with the Trust is strictly confidential and shall not be disclosed to any unauthorized person.

(If any of the above declarations cannot be made truthfully, please provide full details below):

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**Name** Nitish Srivastava

**Designation / Role:** CPO

**Date of Joining / Association:** 1-Dec-2015

**Date of Declaration:** 15-Dec-2015

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## **ANNEXURE B**

### **CHILD PROTECTION INCIDENT REPORT FORM**

(CONFIDENTIAL)

**Report No.:** \_\_\_\_\_

**Date of Report:** \_\_\_\_\_

**Report received by (CPO Name):** \_\_\_\_\_

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#### **SECTION 1 — DETAILS OF THE PERSON REPORTING**

<b>Field</b>	<b>Details</b>
Name	
Designation / Role	
Phone Number	

<b>Field</b>	<b>Details</b>
Email	
Relationship to the child	

---

## **SECTION 2 — DETAILS OF THE CHILD**

<b>Field</b>	<b>Details</b>
Name of the child	
Age / Date of birth	
Gender	
School / Class (if applicable)	
Address	
Name of parent / guardian	
Phone number of parent / guardian	

---

## **SECTION 3 — DETAILS OF THE INCIDENT**

<b>Field</b>	<b>Details</b>
Date of incident	
Time of incident (approx.)	
Location of incident	
Nature of concern (Physical abuse / Emotional abuse / Sexual abuse / Neglect / Exploitation / Bullying / Other)	
Description of the incident (in the child's own words wherever possible)	
Name of the alleged offender (if known)	
Relationship of the alleged offender to the child	
Whether the alleged offender is a Representative of the Trust (Yes / No)	
Names of any witnesses	

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## **SECTION 4 — IMMEDIATE ACTIONS TAKEN**

<b>Field</b>	<b>Details</b>
Steps taken to ensure the child's safety	
Medical attention provided (Yes / No / Not required)	
Parents / Guardians informed (Yes / No / Not advisable — specify reason)	
Reported to police / SJPU / CHILDLINE (Yes / No — if Yes, provide details)	
Alleged offender suspended / removed from contact with children (Yes / No / Not	

**Field** **Details**

applicable)

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### **SECTION 5 — FOLLOW-UP**

<b>Field</b>	<b>Details</b>
CPC informed (Date and time)	
Board informed (Date and time)	
External authorities informed (Date, authority, and contact person)	
Counselling arranged for the child (Yes / No / Pending)	
Current status of the matter	

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### **SECTION 6 — DECLARATION BY REPORTER**

I confirm that the above information is true and accurate to the best of my knowledge. I understand the confidentiality requirements under this Policy and the POCSO Act, and I undertake to maintain confidentiality regarding this report and the identity of the child.

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

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### **FOR OFFICIAL USE — CPO**

<b>Field</b>	<b>Details</b>
Report reviewed by CPO on (date)	
Classification of concern	
Actions directed by CPO	
Referral to CPC (Date)	
Referral to statutory authorities (Date and details)	
Final outcome / resolution	
Case closed on (date)	

**CPO Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

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# ANNEXURE C

## KEY EMERGENCY CONTACTS AND STATUTORY AUTHORITIES

S. No.	Authority / Helpline	Contact Details
1.	<b>CHILDLINE (24-hour helpline for children in distress)</b>	<b>1098</b>
2.	<b>Police Emergency (Uttar Pradesh)</b>	<b>112</b>
3.	<b>UP Dial 100 (Police Helpline)</b>	<b>100</b>
4.	<b>Women Helpline</b>	<b>1090 / 1091</b>
5.	<b>Ambulance Helpline</b>	<b>108</b>
6.	<b>Fire Services</b>	<b>101</b>
7.	<b>Commissioner of Police, Gautam Buddh Nagar</b>	<b>Office: Sector 108, Noida, Gautam Buddha Nagar, Uttar Pradesh. Phone: 0120-2500111. Twitter/X: @naboracommission</b>
8.	<b>Police Station — Sector 20, Noida</b>	<b>CUG No.: 8595902530</b>
9.	<b>Police Station — Sector 39, Noida</b>	<b>CUG No.: 8595902532</b>
10.	<b>Police Station — Sector 24, Noida</b>	<b>CUG No.: 8595902534</b>
11.	<b>Police Station — Sector 58, Noida</b>	<b>CUG No.: 8595902535</b>
12.	<b>Police Station — Sector 49, Noida</b>	<b>CUG No.: 8595902537</b>
13.	<b>Police Station — Expressway, Noida</b>	<b>CUG No.: 8595902533</b>
14.	<b>Police Station — Phase 2, Noida</b>	<b>CUG No.: 8595902538</b>
15.	<b>Police Station — Phase 3, Noida</b>	<b>CUG No.: 8595902536</b>

16.	District Child Welfare Committee (CWC), Gautam Buddh Nagar	Plot No. 3, B-104, Main Road, Sector 41, Noida — 201303, Uttar Pradesh
17.	District Probation Officer / District Child Protection Officer (DCPO), Gautam Buddh Nagar	Office: Block B, Phase 2, Noida, Gautam Buddh Nagar. Phone: 0120-4325684
18.	District Magistrate, Gautam Buddh Nagar	Email: dmgbn[at]nic[dot]in. Phone: 9870145599. Website: <a href="https://gbnagar.nic.in">https://gbnagar.nic.in</a>
19.	Chief Minister Helpline (Uttar Pradesh)	1076
20.	UP State Commission for Protection of Child Rights (UPSCPCR)	14-B, Mall Avenue, Lal Bahadur Shastri Marg, Lucknow, Uttar Pradesh — 226001. Phone: 0522-2239066. Website: <a href="https://upbalayog.com">https://upbalayog.com</a>
21.	National Commission for Protection of Child Rights (NCPCR)	5th Floor, Chanderlok Building, 36, Janpath, New Delhi — 110001. Phone: 011-23478200. Website: <a href="https://www.ncpcr.gov.in">https://www.ncpcr.gov.in</a>
22.	Post Graduate Institute of Child Health (PGICH), Noida	Sector 30, Noida, Uttar Pradesh. Phone: 0120-2457000. Email: childpginoida@gmail.com
23.	Government Institute of Medical Sciences (GIMS), Greater Noida	Knowledge Park III, Greater Noida, Uttar Pradesh. Emergency: 9667993869. Website: <a href="https://gims.ac.in">https://gims.ac.in</a>
24.	District Government Multi Speciality Hospital, Noida	Sector 39, Noida, Gautam Buddh Nagar, Uttar Pradesh
25.	Child Protection Officer (CPO) — Puppets Picture Education Trust	Name: [Insert Name]. Phone: [Insert Phone Number]. Email: [Insert Email Address]

## ANNEXURE D

### CHILD SAFETY CHECKLIST

(To be completed by the activity coordinator before every program / event involving children)

S. No.	Item	Yes / No / N/A	Remarks
1.	All Representatives present have signed the Self-Declaration		

S. No.	Item	Yes / No / N/A	Remarks
	(Annexure A) and received CPP training		
2.	All Representatives are wearing visible identification		
3.	Venue has been inspected for safety hazards		
4.	Separate toilet facilities for boys and girls are available and clean		
5.	First-aid kit is available and stocked		
6.	At least one person trained in first aid is present		
7.	Fire safety measures and emergency exits are in place and accessible		
8.	Two-adult rule is being observed (at least two adults present at all times)		
9.	Parent/guardian consent forms have been collected for all participating children		
10.	Photo/video consent has been obtained where applicable		
11.	Children have been briefed on expected behaviour and reporting mechanism		
12.	Transportation arrangements (if any) comply with Policy requirements		
13.	CPO contact details are prominently displayed / accessible to all		
14.	CHILDLINE (1098) number is prominently displayed		
15.	Emergency contact details of all participating children are available		
16.	Activity area is open, visible, and supervised		
17.	Digital/online safety measures are in place (if applicable)		

**Completed by:**

Name: \_\_\_\_\_ Designation: \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

**Reviewed by CPO:**

Name: \_\_\_\_\_ Date: \_\_\_\_\_ Signature: \_\_\_\_\_