

SAFEGUARDING POLICY

PUPPETS PICTURE EDUCATION TRUST

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

Date of Adoption: 1-Dec-2015

Resolution No.: 7

PREAMBLE

Puppets Picture Education Trust (“the Trust”) is a public charitable trust committed to educational and social development. In the course of fulfilling its mission, the Trust engages with children, young persons, vulnerable adults, community members, beneficiaries, partner organizations, and various stakeholders.

The Trust recognizes that safeguarding is both an organizational and individual responsibility. Every person who comes into contact with the Trust — whether as a beneficiary, participant, employee, volunteer, or community member — has the right to be treated with dignity, respect, and safety, and to be protected from all forms of harm, abuse, neglect, exploitation, and harassment.

This Safeguarding Policy (“Policy”) establishes a comprehensive, organization-wide framework to prevent, detect, report, and respond to all forms of harm — to children, vulnerable adults, beneficiaries, communities, staff, and the Trust’s organizational integrity — in connection with the Trust’s operations, programs, and activities.

The Board of Trustees, comprising **Mr. Rahul Chakraborty** and **Mr. Arun Chakraborty**, adopts this Policy as an overarching governance instrument that integrates and complements the Trust’s existing **Child Protection Policy**, **Anti-Fraud and Anti-Corruption Policy**, and **Conflict of Interest Policy**.

The Trust maintains a **zero-tolerance approach** towards all forms of abuse, exploitation, harassment, and harm.

ARTICLE 1 — OBJECTIVES

1.1 To establish an organization-wide culture of safeguarding that is embedded in every program, activity, operation, and interaction of the Trust.

1.2 To protect **children** (persons below 18 years) who participate in, benefit from, or come into contact with the Trust’s work, from all forms of abuse, neglect, exploitation, and harm.

1.3 To protect **vulnerable adults** — including persons with disabilities, elderly persons, persons from marginalized communities, and other at-risk individuals — from abuse, neglect, exploitation, and harm.

1.4 To protect **beneficiaries and community members** in the Trust’s operational areas from any adverse impact arising from the Trust’s programs or the conduct of its Representatives.

1.5 To protect **staff, volunteers, and other Representatives** of the Trust by providing a safe, respectful, and dignified working environment, free from harassment, bullying, and discrimination.

1.6 To protect the **organizational integrity, reputation, assets, and data** of the Trust from misuse, fraud, and reputational harm.

1.7 To ensure compliance with all applicable laws, 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 Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act), the Rights of Persons with Disabilities Act, 2016 (RPwD 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), the Prohibition of Child Marriage Act, 2006, the Information Technology Act, 2000, the Prevention of Corruption Act, 1988 (as amended), the Bharatiya Nyaya Sanhita, 2023, the Foreign Contribution (Regulation) Act, 2010 (if applicable), the Constitution of India, and all applicable state-level laws and regulations.

1.8 To apply the principle of the “**best interests of the child**” and the principle of “**do no harm**” in all decisions and actions.

ARTICLE 2 — DEFINITIONS

2.1 “Trust” means Puppets Picture Education Trust.

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

2.3 “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, researchers, journalists, 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, vulnerable adults, beneficiaries, or communities through the Trust's activities.

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

2.5 “Vulnerable Adult” means a person aged 18 years or over who is or may be in need of support or care by reason of mental or physical disability, age, illness, poverty, marginalization, or powerlessness, and who is or may be unable to take care of themselves or protect themselves against significant harm, abuse, or exploitation.

2.6 “Beneficiary” means any person — child or adult — who directly or indirectly receives services, support, education, training, or other benefits from the Trust's programs and activities.

2.7 “Safeguarding” means the proactive, preventive, and responsive measures taken by the Trust to protect children, vulnerable adults, beneficiaries, communities, staff, and organizational integrity from all forms of harm, abuse, neglect, exploitation, harassment, and misconduct, and to create a safe and enabling environment for all persons associated with the Trust.

2.8 “Abuse” means any act or failure to act that results in, or has the potential to result in, significant harm to a person. Abuse includes **physical abuse** (use of physical force resulting in harm, including corporal punishment), **emotional/psychological abuse** (persistent pattern of behaviour damaging emotional well-being, including belittling, threatening, intimidating, humiliating, discriminating, or rejecting), **sexual abuse** (any sexual act or behaviour committed against a person without consent, or against any child, as defined under the POCSO Act), **neglect** (failure to provide for basic needs including safety, health, supervision, or emotional care), and **exploitation** (use of a person for the benefit of others to the detriment of their well-being, including child labour, trafficking, and commercial or sexual exploitation).

2.9 “Harassment” means any unwanted conduct — verbal, non-verbal, or physical — that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment includes sexual harassment as defined under the POSH Act, 2013.

2.10 “Bullying” means repeated aggressive, intimidating, or harmful behaviour by one or more persons towards another, including physical, verbal, social/relational, and cyber bullying.

2.11 “Do No Harm” means the principle that the Trust and its Representatives shall take all reasonable steps to ensure that their actions, programs, and interventions do not cause, contribute to, or exacerbate harm to any person or community.

2.12 “Safeguarding Officer” or “SO” means the person designated by the Board to lead the implementation of this Policy and serve as the primary point of contact for all safeguarding concerns.

2.13 “Safeguarding Committee” or “SC” means the committee constituted by the Board to oversee the implementation, monitoring, and review of this Policy.

ARTICLE 3 — SCOPE AND APPLICABILITY

3.1 This Policy applies to **all Representatives** of the Trust, without exception.

3.2 This Policy covers safeguarding in respect of **children, vulnerable adults, beneficiaries and community members, staff and other Representatives** (workplace safety, dignity, and well-being), and **organizational integrity** (assets, data, reputation, and compliance).

3.3 This Policy applies to all programs, projects, events, activities, communications, research, fundraising, advocacy, partnerships, and operations of the Trust, whether conducted at the Trust’s premises, at external venues, in communities, schools, online or through digital platforms, or during transportation arranged by the Trust.

3.4 This Policy is the overarching safeguarding framework of the Trust and is to be read in conjunction with the Trust’s **Child Protection Policy** (for detailed child-specific provisions), **Anti-Fraud and Anti-Corruption Policy**, and **Conflict of Interest Policy**.

ARTICLE 4 — GUIDING PRINCIPLES

4.1 Zero Tolerance: The Trust has zero tolerance for all forms of abuse, exploitation, harassment, neglect, and harm — against children, vulnerable adults, beneficiaries, communities, or staff.

4.2 Best Interests of the Child: In all matters concerning children, the best interests of the child shall be the primary consideration.

4.3 Do No Harm: The Trust and its Representatives shall ensure that their actions, programs, and presence do not cause or contribute to harm.

4.4 Non-Discrimination: Every person shall be treated with equal dignity and respect, without discrimination on any ground including gender, age, caste, religion, ethnicity, language, disability, socio-economic status, sexual orientation, or any other factor.

4.5 Dignity and Respect: The inherent dignity of every person is non-negotiable. All interactions shall be conducted with respect, empathy, and cultural sensitivity.

4.6 Confidentiality: Information regarding safeguarding concerns, including the identity of the affected person and the reporter, shall be kept strictly confidential, disclosed only on a need-to-know basis and in accordance with law.

4.7 Accountability: Every Representative is personally accountable for safeguarding. The Trust is institutionally accountable for creating and maintaining a safe environment.

4.8 Participation: Children and vulnerable adults shall be heard and their views given due weight, in a manner appropriate to their age, maturity, and capacity.

4.9 Proportionality: Responses to safeguarding concerns shall be proportionate to the level of risk and harm involved.

4.10 Prevention First: Safeguarding is primarily about prevention — creating systems, cultures, and behaviours that reduce the risk of harm before it occurs.

4.11 Mandatory Reporting: Under Section 19 of the POCSO Act, all persons are mandatorily required to report knowledge or apprehension of a sexual offence against a child. Failure to report is a criminal offence under Section 21 of the POCSO Act.

ARTICLE 5 — SAFEGUARDING STRUCTURE

5.1 Safeguarding Committee (SC)

The Board shall constitute a **Safeguarding Committee (SC)** comprising 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 with relevant expertise (e.g., child rights, social work, law, counselling, disability rights).

The SC shall be gender-balanced wherever possible and shall serve for a term of **2 (two) years**, renewable by the Board.

The SC shall meet at least once every **six (6) months** and additionally as required in response to any reported incident.

5.2 Safeguarding Officer (SO)

The Board shall designate a **Safeguarding Officer (SO)** who shall serve as the primary point of contact for all safeguarding concerns across the Trust. The SO may also serve as the Child Protection Officer (CPO) under the Trust's Child Protection Policy.

Designated Safeguarding Officer:

Name: **Nitish Srivastava**

Email: **puppetspicture@gmail.com**

Phone: **+91-9818941087**

5.3 Roles and Responsibilities

Board of Trustees: Ultimate responsibility for safeguarding governance. The Board shall approve this Policy and its amendments, allocate resources for safeguarding, receive and act upon reports from the SC and SO, and set the ethical tone for the organization.

Safeguarding Committee: Oversee the implementation, monitoring, and annual review of this Policy. Receive, review, and guide the resolution of safeguarding complaints. Conduct or commission risk assessments. Recommend policy updates. Ensure training and awareness. Report to the Board.

Safeguarding Officer: Receive and record all safeguarding reports and concerns. Take immediate steps to ensure the safety of the affected person. Conduct or coordinate preliminary inquiries. Ensure mandatory statutory reporting. Liaise with statutory authorities. Maintain confidential records. Support affected persons and their families.

All Representatives: Read, understand, and comply with this Policy. Be vigilant for signs of harm or risk. Report all concerns promptly. Participate in safeguarding training. Conduct themselves in accordance with the Code of Conduct.

ARTICLE 6 — CODE OF CONDUCT

6A — Universal Standards

All Representatives of the Trust shall:

6A.1 Treat every person — child, adult, beneficiary, colleague, community member — with dignity, respect, and empathy.

6A.2 Be aware of, and comply with, all safeguarding policies and applicable laws.

6A.3 Be vigilant for signs of abuse, harm, or risk, and report any concern immediately.

6A.4 Act in the best interests of children and vulnerable adults at all times.

6A.5 Maintain appropriate professional boundaries in all interactions.

6A.6 Respect the privacy, confidentiality, and personal data of all persons.

6A.7 Obtain informed consent before collecting, using, or sharing any personal information, images, or stories.

6A.8 Promote an inclusive, non-discriminatory, and welcoming environment for all persons.

6A.9 Attend all safeguarding training and awareness sessions.

6B — Prohibited Conduct

No Representative of the Trust shall:

6B.1 Engage in, facilitate, or condone any form of physical, emotional, sexual, or psychological abuse against any person.

6B.2 Use corporal punishment or physical force of any kind against any person, including as a disciplinary measure.

6B.3 Use language or behaviour that is abusive, threatening, intimidating, demeaning, humiliating, discriminatory, or sexually inappropriate.

6B.4 Engage in any form of sexual abuse, sexual exploitation, or sexual harassment against any person — child or adult. This includes all acts constituting offences under the POCSO Act and the POSH Act.

6B.5 Be alone with a child in a closed, private, or unsupervised setting. The “**two-adult rule**” shall be observed at all times: at least two adults must be present during all interactions with children.

6B.6 Develop inappropriate personal, emotional, romantic, or sexual relationships with children, vulnerable adults, or beneficiaries.

6B.7 Share, show, or expose any person — especially children — to pornographic, obscene, violent, or inappropriate content.

6B.8 Provide or facilitate access to alcohol, tobacco, drugs, or intoxicating substances to any child, or use such substances while interacting with children.

6B.9 Exploit, traffic, or use any person — especially children — for labour, begging, commercial purposes, or personal benefit.

6B.10 Discriminate against any person on any ground.

6B.11 Engage in, facilitate, or condone bullying, hazing, ragging, or peer violence.

6B.12 Exchange personal contact information with children for non-official purposes, or communicate privately with children through personal channels.

6B.13 Photograph, video-record, or use the image, name, or story of any child or vulnerable adult without proper informed consent and in compliance with this Policy.

6B.14 Take a child to their personal residence or any private location.

6B.15 Misuse the Trust's funds, assets, data, or organizational identity.

6B.16 Fail to report a safeguarding concern, or retaliate against anyone who reports one.

ARTICLE 7 — SAFEGUARDING CHILDREN

7.1 The Trust's **Child Protection Policy** (adopted on [**Insert Date**]) contains detailed provisions for the safeguarding of children and shall be read as an integral part of this Safeguarding Policy.

7.2 All provisions of the Child Protection Policy — including the Code of Conduct, safe recruitment, reporting mechanism, investigation procedures, consequences, and emergency contacts — are incorporated herein by reference.

7.3 In addition, the Trust commits to applying the following principles specific to child safeguarding: all interactions with children shall be in open, visible, and supervised environments; at least two adults shall be present during all activities involving children; the Trust shall promote children's active participation in developing age-appropriate safety guidelines; the Trust shall build children's own capacity to recognise, resist, and report abuse; and the Trust shall not employ or use children for labour of any kind.

ARTICLE 8 — SAFEGUARDING VULNERABLE ADULTS

8.1 The Trust recognizes that vulnerable adults — including persons with disabilities, elderly persons, persons from marginalized communities, persons with mental health conditions, persons affected by poverty, and others who may be unable to protect themselves from harm — face heightened risks of abuse, neglect, and exploitation.

8.2 All Representatives shall treat vulnerable adults with dignity, respect, empathy, and patience, provide accessible and inclusive environments for vulnerable adults, obtain

informed consent from vulnerable adults (or their legal guardians, where appropriate) before any interaction, data collection, or use of their images or stories, be alert to signs of abuse, neglect, or exploitation of vulnerable adults, and report any concern to the Safeguarding Officer immediately.

8.3 The Trust shall not discriminate against persons with disabilities in any program or activity, in compliance with the Rights of Persons with Disabilities Act, 2016. The Trust shall make reasonable accommodations to ensure accessibility, participation, and safety for persons with disabilities.

8.4 The Trust shall ensure that vulnerable adults are not subjected to any form of undue influence, coercion, or pressure to participate in programs, research, or communications activities.

ARTICLE 9 — SAFEGUARDING STAFF AND WORKPLACE

9.1 The Trust is committed to providing all Representatives with a safe, respectful, dignified, and non-discriminatory working environment.

9.2 Sexual Harassment: The Trust has zero tolerance for sexual harassment in the workplace. The Trust shall comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act), and shall constitute an **Internal Committee (IC)** as required by law when the Trust employs 10 or more persons. Until such time, the Safeguarding Committee shall handle complaints of sexual harassment. All complaints of sexual harassment shall be dealt with in accordance with the POSH Act.

9.3 Bullying and Harassment: No Representative shall engage in bullying, harassment, intimidation, discrimination, or abusive behaviour towards any colleague, subordinate, or other person in the workplace.

9.4 Physical Safety: The Trust shall ensure that all workplaces and program venues are safe, well-maintained, and free from hazards. Fire safety, first-aid, and emergency response measures shall be in place at all premises.

9.5 Psychosocial Well-Being: The Trust acknowledges that Representatives working on sensitive themes (child abuse, gender-based violence, community distress) may experience emotional stress or burnout. The Trust shall make reasonable efforts to provide support, including access to counselling and reasonable workload management.

9.6 Whistleblower Protection: No Representative shall face retaliation, intimidation, discrimination, or adverse action of any kind for reporting, in good faith, a safeguarding

concern. Retaliation against a whistleblower shall itself be treated as a serious safeguarding violation.

ARTICLE 10 — SAFEGUARDING IN PROGRAMS AND OPERATIONS

10A — Safe Programming

10A.1 Safeguarding shall be embedded into every stage of the program cycle — design, planning, implementation, monitoring, evaluation, and closure.

10A.2 A **safeguarding risk assessment** shall be conducted for every new program, project, event, or activity involving children, vulnerable adults, or communities, before the activity commences. The risk assessment shall identify potential safeguarding risks (physical, emotional, sexual, online, reputational), assess the likelihood and severity of each risk, and define mitigation measures for each identified risk.

10A.3 All program and activity venues shall comply with the physical safety, transportation, and infrastructure requirements set out in the Trust’s Child Protection Policy.

10B — Safe Recruitment

10B.1 Before engaging any Representative who will have contact with children, vulnerable adults, or beneficiaries, the Trust shall conduct reasonable background verification (identity documents, educational qualifications, reference checks, criminal record check where feasible), obtain a signed **Self-Declaration and Safeguarding Undertaking** (Annexure A), and provide mandatory safeguarding induction training within **15 days** of engagement.

10B.2 All job descriptions, engagement letters, consultant contracts, vendor agreements, and volunteer agreements shall include a reference to this Safeguarding Policy and the requirement to comply with it.

10B.3 All contracts with vendors, suppliers, consultants, and partner organizations shall include a **safeguarding clause** requiring them to adhere to this Policy or maintain an equivalent or higher standard of safeguarding.

10C — Safeguarding in Communications, Media, and Research

10C.1 All communications, publications, social media posts, fundraising materials, reports, and advocacy materials involving children or vulnerable adults shall portray them with dignity and respect.

10C.2 Informed written consent shall be obtained from the person (and from the parent/guardian of a child) before using their photograph, video, name, or story for any purpose.

10C.3 Full names, exact locations, or identifying details of children or vulnerable adults shall not be published alongside their images unless there is a specific, justified, and consented reason.

10C.4 Images of children or vulnerable adults in distressing, degrading, or undignified situations shall never be used.

10C.5 All researchers, journalists, photographers, and media personnel visiting the Trust's programs shall be briefed on this Policy, shall sign the Safeguarding Undertaking, and shall be accompanied by a designated Representative at all times.

10C.6 All research involving children or vulnerable adults shall follow ethical research principles, including voluntary informed consent, the right to opt out without consequences, and safeguarding-sensitive methodologies.

10D — Safeguarding Data and Privacy

10D.1 All personal data of children, vulnerable adults, and beneficiaries shall be collected, stored, processed, and shared in a manner that protects their privacy, dignity, and safety.

10D.2 Personal data shall be stored securely (physically in locked storage and/or digitally with password protection and restricted access), accessed only by authorized persons on a need-to-know basis, not shared with third parties without informed consent (except as required by law), and retained only for as long as necessary and then securely destroyed.

10D.3 The Trust shall comply with applicable data protection laws and principles.

10E — Safeguarding in Partnerships

10E.1 All partner organizations shall be required to maintain a safeguarding policy that provides the same or a higher level of protection as this Policy, in full compliance with applicable law.

10E.2 If a partner organization does not have its own safeguarding policy, it shall agree in writing to abide by this Policy for the duration of the partnership.

10E.3 The Trust shall conduct a **safeguarding assessment** of potential and current partners, reviewing the availability of a safeguarding policy, safe recruitment practices, reporting mechanisms, and compliance history.

10F — Safeguarding Organizational Assets and Reputation

10F.1 The Trust’s funds, property, equipment, name, logo, and brand shall be used only for authorized purposes, in compliance with the Trust Deed, applicable law, and the Trust’s governance policies.

10F.2 The Trust’s **Anti-Fraud and Anti-Corruption Policy** (adopted on **[Insert Date]**) contains detailed provisions for safeguarding organizational integrity and is incorporated herein by reference.

10F.3 No Representative shall use the Trust’s identity, assets, or resources for personal benefit, or in any manner that could damage the Trust’s reputation.

ARTICLE 11 — REPORTING MECHANISM

11.1 Duty to Report

Every Representative has an **absolute duty** to report any known, suspected, or apprehended safeguarding concern — whether relating to children, vulnerable adults, beneficiaries, staff, or organizational integrity — to the Safeguarding Officer **immediately and without delay**.

11.2 Channels for Reporting

To the Safeguarding Officer: In person, by phone (**+91-9818941087**), or by email (**puppetspicture@gmail.com**).

Written Report: Using the **Safeguarding Concern Report Form** (Annexure B).

Anonymous Report: Reports may be submitted anonymously in writing, addressed to: **The Safeguarding Committee, Puppets Picture Education Trust, [Insert Address]**, marked **“CONFIDENTIAL — Safeguarding Report”**.

By a Child or Beneficiary: Children and beneficiaries shall be informed, in accessible and age-appropriate language, of their right to report and the mechanism for doing so. They may report to the SO, any trusted Representative, or through **CHILDLINE (1098)**.

Statutory Reporting: Cases involving sexual offences against children shall be reported **immediately** to the local police / SJPU / CHILDLINE (1098) as mandated under Section 19 of the POCSO Act. Cases involving sexual harassment at the workplace shall be dealt with under the POSH Act.

11.3 Timeline

Internal reports shall be made within **24 hours** of the concern arising. Statutory reports (POCSO) shall be made **immediately**, and in any case within **24 hours**.

11.4 Whistleblower Protection

No person shall face any form of retaliation for making a good-faith safeguarding report. Retaliation is itself a safeguarding violation. Malicious or knowingly false reports shall be subject to disciplinary action.

ARTICLE 12 — RESPONSE AND INVESTIGATION

12.1 Immediate Response

Upon receiving a report, the SO shall ensure the immediate safety and well-being of the affected person, record the report using the Safeguarding Concern Report Form (Annexure B), inform the Safeguarding Committee and the Board, arrange medical attention and/or counselling if required, make mandatory statutory reports (POCSO, police, CWC, POSH IC) as applicable, suspend the alleged offender from duties if they are a Representative (precautionary measure, not a finding of guilt), and inform the parents/guardians of the affected child (unless the parent/guardian is the alleged offender).

12.2 Investigation

Internal matters (non-criminal): The Safeguarding Committee shall conduct an internal inquiry within **30 days** and recommend appropriate action.

Criminal matters: The Trust shall cooperate fully with law enforcement and shall not conduct any parallel investigation that could interfere with the police investigation.

Natural justice: The alleged offender shall be informed of the allegations and given a reasonable opportunity to respond, subject to the overriding priority of the affected person's safety and legal requirements.

12.3 Confidentiality

All safeguarding matters shall be handled with **strict confidentiality**. Disclosure of the identity of a child victim is a punishable offence under Section 23 of the POCSO Act.

ARTICLE 13 — CONSEQUENCES OF VIOLATION

13.1 Any Representative found to have violated this Policy — through commission, omission, failure to report, complicity, or cover-up — shall be subject to consequences proportionate to the severity of the violation, including verbal or written warning, mandatory counselling and retraining, suspension from duties, termination of employment or engagement, blacklisting from

future association with the Trust, reporting to law enforcement for criminal prosecution, reporting to statutory/regulatory authorities, and civil legal action for recovery of damages.

13.2 Any person who retaliates against a reporter or whistleblower, makes a knowingly false or malicious report, obstructs an investigation, or destroys or tampers with evidence shall be subject to the same consequences.

ARTICLE 14 — TRAINING AND AWARENESS

14.1 Induction Training: Every new Representative who will interact with children, vulnerable adults, or beneficiaries shall receive mandatory safeguarding induction training within **15 days** of engagement, covering this Policy, the Child Protection Policy, the Code of Conduct, recognizing signs of abuse, reporting procedures, relevant laws (POCSO, POSH, JJ Act, RPwD Act), and consequences of violation.

14.2 Annual Refresher Training: The Trust shall conduct refresher safeguarding training for all Representatives at least **once every financial year**.

14.3 Awareness for Children and Beneficiaries: The Trust shall, in age-appropriate and accessible ways, inform children and beneficiaries of their rights, acceptable and unacceptable behaviour, and how to report a concern.

14.4 Training Records: The Trust shall maintain records of all safeguarding training conducted, including dates, topics, attendees, and trainers.

ARTICLE 15 — RECORD-KEEPING

15.1 The Trust shall maintain confidential records of all safeguarding reports, inquiries, investigations, actions, and outcomes, Safeguarding Concern Report Forms, Self-Declarations and Undertakings, training records, risk assessments, Safeguarding Committee meeting minutes, and annual safeguarding review reports.

15.2 All records shall be stored securely and shall only be accessible to the SO, the SC, and the Board.

15.3 Records shall be retained for a minimum of **10 (ten) years** or as required by law, whichever is longer.

ARTICLE 16 — ANNUAL REVIEW AND MONITORING

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

16.2 The annual review shall assess all safeguarding incidents reported during the year and their outcomes, the adequacy of prevention measures and internal controls, compliance with training requirements, the functioning of the SO and SC, changes in applicable law or best practices, feedback from children, beneficiaries, staff, and partners (where appropriate), and safeguarding risk assessments of programs and partnerships.

16.3 The Safeguarding Committee shall prepare an **Annual Safeguarding Report** and submit it to the Board.

16.4 Findings shall be recorded in the Board meeting minutes.

ARTICLE 17 — RELATIONSHIP WITH OTHER POLICIES AND LAWS

17.1 This Safeguarding Policy is the overarching governance framework for safeguarding within the Trust and shall be read in conjunction with the Trust's **Child Protection Policy** (for detailed child-specific provisions, reporting forms, emergency contacts, and procedures), **Anti-Fraud and Anti-Corruption Policy** (for provisions on fraud, bribery, corruption, and financial integrity), **Conflict of Interest Policy** (for provisions on managing conflicts between the Trust and related entities), and any other governance policies adopted by the Board.

17.2 In the event of any overlap between this Policy and a specific policy (e.g., the Child Protection Policy), the **more protective** standard shall prevail.

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

ARTICLE 18 — AMENDMENT

18.1 This Policy may be amended by a resolution of the Board, in consultation with the Safeguarding Committee.

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


18.3 This Policy shall be subject to a full review at least once every **3 (three) years**, in addition to annual reviews.

ARTICLE 19 — ADOPTION

This Safeguarding Policy has been read, discussed, and unanimously adopted by the Board of Trustees of Puppets Picture Education Trust at its meeting held on **15-Dec-15**, vide Resolution No. **7**.

Mr. Rahul Chakraborty
Trustee
Puppets Picture Education Trust

Date: 1-Dec-2015

Signature: 

Mr. Arun Chakraborty
Trustee
Puppets Picture Education Trust

Date: 1-Dec-2015

Signature: 

ANNEXURE A

SELF-DECLARATION AND SAFEGUARDING UNDERTAKING

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

1. I have received, read, and understood the Safeguarding Policy of Puppets Picture Education Trust, along with the Trust's Child Protection Policy, Anti-Fraud and Anti-Corruption Policy, and Conflict of Interest Policy.
2. I agree to abide by all provisions of these Policies, including the Code of Conduct, during the entire period of my association with the Trust.
3. I understand that any violation may result in disciplinary action including termination and referral to law enforcement.
4. I declare that I have **no criminal record or pending criminal case** related to child abuse, sexual offence, violence, exploitation, fraud, corruption, or any offence against a child or vulnerable adult, in any jurisdiction.
5. I declare that I have **never been dismissed, terminated, or asked to resign** from any previous employment on grounds related to abuse, misconduct, harassment, safeguarding violation, fraud, or corruption.
6. 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.
7. I undertake to maintain strict confidentiality regarding all personal information of children, vulnerable adults, and beneficiaries.
8. I understand that the Trust may conduct background verification, and I consent to the same.

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

Name: Nitish Srivastava

Designation / Role: Head of Operations&Compliance

Date of Joining / Association: 1-Dec-15

Date of Declaration: 15-Dec-15

ANNEXURE B

SAFEGUARDING CONCERN REPORT FORM

(CONFIDENTIAL)

Report No.: _____

Date of Report: _____

Report received by (SO Name): _____

SECTION 1 — DETAILS OF THE PERSON REPORTING

Field	Details
Name (or "Anonymous")	
Designation / Role	
Phone Number	
Email	
Relationship to the affected person	

SECTION 2 — DETAILS OF THE AFFECTED PERSON

Field	Details
Name	
Age / Date of Birth	
Gender	
Category (Child / Vulnerable Adult / Staff / Beneficiary / Other)	
Address / Location	

Field	Details
Name of Parent / Guardian / Emergency Contact	
Phone Number of Parent / Guardian	

SECTION 3 — DETAILS OF THE CONCERN

Field	Details
Date of incident / concern	
Time (approx.)	
Location	
Nature of concern (Physical abuse / Emotional abuse / Sexual abuse / Neglect / Exploitation / Harassment / Bullying / Fraud / Corruption / Data breach / Other — specify)	
Description of the concern (in the affected person's own words wherever possible)	
Name of the alleged offender (if known)	
Relationship of the alleged offender to the affected person	
Whether the alleged offender is a Representative of the Trust (Yes / No)	
Names of any witnesses	
Has the affected person given consent to this report? (Yes / No / Not applicable — explain)	

SECTION 4 — IMMEDIATE ACTIONS TAKEN

Field	Details
Steps taken to ensure safety of the affected person	
Medical attention provided (Yes / No / Not required)	
Parent / Guardian informed (Yes / No / Not advisable — specify reason)	
Reported to police / SJPU / CHILDLINE (Yes / No — if Yes, provide details)	
Alleged offender suspended / removed from contact (Yes / No / N/A)	

SECTION 5 — FOLLOW-UP AND RESOLUTION

Field	Details
Safeguarding Committee informed (Date and time)	
Board informed (Date and time)	

Field	Details
External authorities informed (Date, authority, contact person)	
Counselling arranged (Yes / No / Pending)	
Investigation status	
Final outcome / resolution	
Case closed on (date)	
Lessons learned / preventive actions recommended	

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 and undertake to maintain confidentiality.

Signature: _____ **Date:** _____

FOR OFFICIAL USE — SAFEGUARDING OFFICER

Field	Details
Report reviewed on (date)	
Classification	
Actions directed	
Referral to SC (Date)	
Referral to statutory authorities (Date and details)	
Final outcome	
Case closed on (date)	

SO Signature: _____ **Date:** _____

ANNEXURE C

KEY EMERGENCY CONTACTS — NOIDA (DISTRICT GAUTAM BUDDH NAGAR, UTTAR PRADESH)

S. No.	Authority / Helpline	Contact Details
1.	CHILDLINE	1098
2.	Police Emergency	112
3.	UP Dial 100	100
4.	Women Helpline	1090 / 1091
5.	Ambulance	108
6.	Fire Services	101
7.	Commissioner of Police, Gautam Buddh Nagar	Sector 108, Noida. Phone: 0120-2500111
8.	Police Station — Sector 20, Noida	8595902530
9.	Police Station — Sector 39, Noida	8595902532
10.	Police Station — Sector 24, Noida	8595902534
11.	Police Station — Sector 58, Noida	8595902535
12.	CWC, Gautam Buddh Nagar	Plot No. 3, B-104, Main Road, Sector 41, Noida — 201303
13.	District Child Protection Officer (DCPO), Gautam Buddh Nagar	Block B, Phase 2, Noida. Phone: 0120-4325684
14.	District Magistrate, Gautam Buddh Nagar	Email: dmgbn[at]nic[dot]in. Phone: 9870145599
15.	Chief Minister Helpline (UP)	1076
16.	UP State Commission for Protection of Child Rights (UPSCPCR)	14-B, Mall Avenue, LBS Marg, Lucknow — 226001 . Phone: 0522-2239066
17.	NCPCR	5th Floor, Chanderlok Building, 36 Janpath, New Delhi — 110001 . Phone: 011-23478200
18.	PGICH (Child Hospital), Noida	Sector 30, Noida. Phone: 0120-2457000
19.	GIMS, Greater Noida	Knowledge Park III, Greater Noida. Emergency: 9667993869
20.	District Govt. Hospital, Noida	Sector 39, Noida
21.	Safeguarding Officer — Puppets Picture Education Trust	Name: Nitish Srivastava / Phone: +91-9818941087 / Email: puppetspicture@gmail.com

ANNEXURE D

SAFEGUARDING RISK ASSESSMENT TEMPLATE

(To be completed before every new program / project / event / activity)

Program / Activity Name: _____

Location: _____

Date(s): _____

Target Group: Children / Vulnerable Adults / Community / Mixed

Assessed by: _____

Date of Assessment: _____

S. No.	Risk Area	Identified Risk	Likelihood (Low / Medium / High)	Severity (Low / Medium / High)	Mitigation Measures	Person Responsible	Status
1.	Physical Safety (venue, infrastructure, fire, water, electricity)						
2.	Transportation Safety						
3.	Supervision of Children / Vulnerable Adults						
4.	Two-Adult Rule Compliance						
5.	Risk of Sexual Abuse / Exploitation						
6.	Risk of Physical Abuse / Corporal Punishment						
7.	Risk of Emotional Abuse / Discrimination						
8.	Risk of Neglect						
9.	Online / Digital Safety (if						

S. No.	Risk Area	Identified Risk	Likelihood (Low / Medium / High)	Severity (Low / Medium / High)	Mitigation Measures	Person Responsible	Status
	applicable)						
10.	Data Protection / Privacy						
11.	Communications / Photography / Media						
12.	Third Party / Vendor / Partner Risks						
13.	Staff / Volunteer Well-being						
14.	Community / Cultural Sensitivities						
15.	Other (specify)						

Overall Risk Level: Low / Medium / High

Approval to Proceed: Yes / No / Yes with conditions

Approved by (SO / SC / Board): _____

Signature: _____ **Date:** _____

ANNEXURE E

ANNUAL SAFEGUARDING REVIEW CHECKLIST

(To be completed by the Safeguarding Committee at the annual review meeting)

Financial Year: _____

Date of Review: _____

S. No.	Item	Yes / No / Partial	Remarks / Action Needed
1.	Safeguarding Policy reviewed and up to date		
2.	Child Protection Policy reviewed and up to date		
3.	Anti-Fraud and Anti-Corruption Policy reviewed and up to date		
4.	Conflict of Interest Policy reviewed and up to date		
5.	Safeguarding Officer designated and functioning		
6.	Safeguarding Committee constituted and meeting regularly		
7.	All current Representatives have signed Self-Declaration (Annexure A)		
8.	All new Representatives received induction training within 15 days		
9.	Annual refresher training conducted for all Representatives		
10.	All safeguarding incidents reported during the year documented and resolved		
11.	Mandatory statutory reports (POCSO, police) made where required		
12.	Confidential safeguarding records securely maintained		
13.	Safeguarding risk assessments conducted for all programs/events		
14.	Partner safeguarding assessments completed		
15.	Photo/video/media consent procedures followed		
16.	Personal data of children/beneficiaries securely stored		
17.	Emergency contact list (Annexure C) verified and updated		
18.	CHILDLINE (1098) and CPO/SO contacts displayed at all venues		
19.	Children and beneficiaries informed of reporting mechanism		
20.	Any changes in law requiring policy amendments		
21.	Overall assessment of safeguarding culture and compliance		

Prepared by: _____

Reviewed by SC on: _____

Submitted to Board on: _____