

Prabhat Education Foundation

Policy Handbook



Updated as on: 18 July 2026

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1. Volume I: Organization Handbook

1.1. About the organization

Prabhat Education Foundation reflects a journey that began in 2003 with the identification and support of children with learning difficulties who were struggling to cope within mainstream schools. Over time, Prabhat became increasingly aware of the challenges faced by children with physical, intellectual, and developmental disabilities and their families in and around Ahmedabad. Many of these families were affected by stigma, lack of awareness, social exclusion, and denial, often preventing children from accessing the support and opportunities they deserved.

Recognizing the need to build capacities, confidence, and opportunities for children with special needs and their families, Prabhat envisioned a localized institutional model that could provide systematic education, rehabilitation, and support services. The organization sought to make these services accessible to individuals facing barriers of poverty, mobility, and limited access to specialized resources. Working closely with and through local communities soon became a defining characteristic of Prabhat's approach.

As its work evolved, Prabhat observed that the need for disability-related services was particularly acute in the eastern part of Ahmedabad, the city's industrial belt, where a significant proportion of residents are migrant families. What began with support to a single child in 2003 has today grown into a comprehensive initiative reaching more than 3,000 children and youth with diverse disabilities and over 300,000 indirect beneficiaries, including family members, caregivers, and community members.

Prabhat currently delivers its interventions through three interrelated programme pillars:

- **Centre-based services**, including special education, therapy, vocational training, and livelihood support;
- **Community-Based Rehabilitation (CBR)**, enabling children and adults with disabilities to access opportunities within their own communities; and
- **Advocacy through networking**, aimed at strengthening inclusive systems, promoting rights, and influencing policy and practice.

Approach

Prabhat's approach is firmly rooted in a rights-based framework rather than a charitable one. The organization believes that every child and adult with a disability has the right to education, healthcare, participation, protection, livelihood, and dignity, as guaranteed by the Constitution of India and international human rights frameworks. Through its programmes, Prabhat seeks to create enabling environments where persons with disabilities can realize their full potential and participate meaningfully in society.

Vision

A society where every child and adult with disabilities is accepted, included, and empowered to realize their full potential, participate meaningfully in all aspects of life, and live with dignity, independence, and equal opportunity.

Mission

To empower children and adults with disabilities through holistic interventions that promote education, skill development, independence, livelihood, well-being, and social inclusion, while

strengthening families, communities, institutions, and systems to embrace diversity and uphold the rights and dignity of all.

Core Values

Dignity and respect

We believe that every individual has inherent worth and deserves to be treated with dignity, respect, and compassion.

Inclusion and equity

We strive to create environments where all individuals, regardless of ability, gender, socio-economic status, religion, or background, have equal opportunities to participate and thrive.

Rights and empowerment

We uphold the rights of People with Disabilities (PwD) and work to empower them to make informed choices and lead self-determined lives.

Child-centred practice

The best interests, safety, development, and participation of children remain central to all our interventions.

Community participation

Sustainable change is possible only when families, communities, and institutions actively participate in creating inclusive societies.

Integrity and accountability

We conduct our work with honesty, transparency, professionalism, and accountability towards all stakeholders.

Excellence and innovation

We continuously seek to improve our programmes and adopt innovative approaches that enhance impact and inclusion.

Collaboration and partnership

We believe lasting change is achieved through partnerships with families, communities, government institutions, civil society organizations, and the private sector.

1.2.Human resource policies

Equal opportunity workplace

Prabhat Education Foundation is committed to creating a workplace where every individual feels respected, valued, and included. We believe that diversity strengthens our organization and enriches our work.

We welcome and encourage applications from individuals of different backgrounds, experiences, identities, and abilities. As an organization working towards inclusion, we actively encourage women and persons with disabilities to be part of our team.

At Prabhat, we strive to create a work environment where everyone has equal opportunities to learn, contribute, grow, and thrive.

1.2.1. Recruitment and selection

Our recruitment process aims to bring together individuals who share our commitment to inclusion, dignity, and social change.

Depending on organizational needs, opportunities may be available as:

- Full-time team members
- Part-time team members
- Consultants
- Project staff
- Fellows
- Trainees
- Interns
- Volunteers

Vacancies may be advertised through professional networks, social media platforms, development sector job portals, educational institutions, or other suitable channels.

While qualifications and experience are important, we also value empathy, integrity, willingness to learn, and the ability to work respectfully with children, adults with disabilities, families, and communities.

Recruitment of consultants and contractual team members

Consultants and contractual team members may be engaged on a project-specific, assignment-based, or fixed-term basis, depending on the requirements of the organization and the availability of funding. The duration, scope of work, deliverables, and terms of engagement shall be clearly outlined in the contract or agreement.

Continuation, renewal, or extension of the engagement shall be based on organizational requirements, project needs, availability of resources, and the individual's performance during the contract period. Prabhat Education Foundation reserves the right to renew or discontinue such engagements at the end of the agreed term.

When welcoming a new team member, we look for individuals who:

- Believe in and uphold the values of inclusion and respect.
- Demonstrate sensitivity towards persons with disabilities.
- Are willing to learn and work collaboratively.
- Understand and commit to safeguarding children and vulnerable adults.

- Are ready to contribute positively to a supportive team culture.

1.2.2. Joining and orientation

We want every new team member to feel welcomed, informed, and confident in their role. All new team members will receive an offer letter outlining the terms of their engagement, including their designation, roles and responsibilities, reporting structure, compensation, and other relevant conditions of employment. The offer letter is intended to provide clarity on expectations and ensure a transparent and mutually understood working relationship from the outset. All employees, consultants, interns, fellows, and volunteers will participate in an orientation process to help them understand:

- Prabhat's vision, mission, and values
- Our programmes and approach
- Organizational policies and systems
- Safeguarding practices and ethical standards
- Roles and responsibilities

At the time of joining, team members will be requested to complete the necessary documentation and acknowledge that they have read and understood the organization's policies.

We encourage new team members to ask questions, seek support, and take time to understand the culture and work of the organization.

1.2.3. Compensation

Prabhat is committed to ensuring fair and transparent compensation practices.

Remuneration is determined based on factors such as:

- Qualifications
- Relevant experience
- Nature and scope of responsibilities
- Skills and competencies
- Performance and contribution

While operating within available resources, the organization strives to recognize and value the contributions of all team members.

1.2.4. Working Hours

The standard working hours at Prabhat are:

Administrative Office Team

- 10:00 a.m. to 6:00 p.m.
- 30-minute lunch break
- Six working days per week

Field Team

- 10:00 a.m. to 6:00 p.m.
- 30-minute lunch break
- Six working days per week

We understand that programme requirements may occasionally require flexibility. Team members are encouraged to discuss any such requirements with their supervisors to ensure a healthy balance between work responsibilities and personal well-being.

For planned leave of more than two consecutive days, prior approval from the reporting supervisor is required to ensure smooth functioning of programmes and services.

1.2.5. Holidays

All full-time team members are entitled to annual public and festive holidays as notified by the organization.

The three National Holidays - Republic Day, Independence Day, and Gandhi Jayanti are observed by all team members.

In addition, employees may choose up to 20 holidays from the annual list of festive holidays announced by the organization each year.

As dates for certain festivals vary, the holiday calendar will be shared at the beginning of each year.

1.2.6. Leave policy

Prabhat recognizes that rest, family commitments, personal needs, cultural celebrations, and health are important aspects of overall well-being.

The leave policy is designed to support team members in maintaining a healthy balance between professional responsibilities and personal life.

Leave Entitlement

All full-time team members are entitled to:

- One weekly day off (Sunday)
- Public and festive holidays as per the annual holiday calendar
- Twelve (12) days of annual leave

Consultants and part-time members

Consultants are expected to plan their leave in consultation with their reporting supervisor and obtain prior approval for any absence that may affect agreed deliverables, timelines, meetings, or organizational commitments. National holidays shall be observed as applicable.

Part-time team members shall work according to the schedule, number of days, and hours mutually agreed upon at the time of engagement and approved by the Director. Any changes to the agreed schedule should be discussed and approved in advance.

While consultants and part-time team members may not be covered under the organization's regular leave entitlements, they are expected to communicate planned absences in a timely manner to ensure continuity of work and programme activities.

Consultants are responsible for adhering to agreed timelines and delivering assignments in accordance with the terms of their engagement.

Leave Guidelines

1. Team members are encouraged to take their weekly day off regularly to ensure adequate rest and well-being.

2. If programme requirements require work on a weekly off or public holiday, a compensatory off may be availed within two weeks in consultation with the supervisor.
3. In cases of illness or unforeseen personal circumstances, team members are encouraged to communicate with their supervisor at the earliest opportunity. The organization will make every effort to respond with understanding and flexibility.
4. Extended leave requests may be considered on compassionate grounds based on individual circumstances.
5. Unused annual leave may be encashed at the end of the year in accordance with organizational norms and available provisions.

1.2.7. Interns and volunteers

Prabhat values the contribution of interns and volunteers and sees them as important partners in learning and social change.

We are committed to providing a meaningful learning experience while ensuring the safety, dignity, and well-being of the children and adults with disabilities we serve.

All interns and volunteers are expected to:

- Participate in orientation and safeguarding sessions.
- Maintain confidentiality.
- Demonstrate professionalism and respect.
- Follow organizational policies and procedures.
- Seek guidance whenever required.

We encourage interns and volunteers to actively engage, ask questions, share ideas, and make the most of their learning experience at Prabhat.

Stipend for interns and volunteers

Prabhat Education Foundation may, at its discretion, provide a stipend to interns or volunteers based on factors such as the nature of the assignment, duration of engagement, funding availability, and organizational requirements. The provision of a stipend shall be determined on a case-by-case basis and should not be considered an entitlement or a standard practice applicable to all internships or volunteer engagements.

1.2.8. Employee well-being and team engagement

Prabhat Education Foundation recognizes that the well-being of its team members is essential to creating a positive and productive work environment. The organization is committed to supporting the physical, emotional, and mental well-being of its employees.

To promote overall wellness, Prabhat organizes periodic well-being and capacity-building workshops in collaboration with qualified professionals and experts from relevant fields. These sessions aim to support personal growth, stress management, work-life balance, and team development.

In addition, the organization endeavours to organize an annual out-of-town team retreat to provide opportunities for reflection, learning, team bonding, and rejuvenation. The costs associated with the retreat is borne by the organization, subject to budgetary provisions and organizational priorities.

1.2.9. Separation from employment

Prabhat recognizes that career aspirations, personal circumstances, and professional opportunities may lead team members to transition from the organization. The organization is committed to ensuring that such transitions are managed with professionalism, respect, and transparency.

Resignation

Employees wishing to resign are requested to provide a minimum of one month's written notice, unless otherwise specified in their contract or appointment letter.

During the notice period, team members are expected to:

- Complete ongoing responsibilities to the extent possible.
- Prepare and submit necessary documentation and reports.
- Handover organizational assets, records, and information.
- Support a smooth transition of responsibilities.

The organization will make every effort to ensure a respectful and professional separation process.

Performance concerns

Prabhat believes that employees perform best when they are provided with guidance, support, and opportunities for growth.

Where performance concerns arise, supervisors will first seek to address them through:

- Constructive feedback.
- Coaching and mentoring.
- Additional guidance and support.
- Reasonable opportunities for improvement.

If performance does not improve despite these efforts and within a reasonable timeframe, the organization may initiate separation procedures in accordance with applicable policies and contractual obligations.

Termination due to organizational requirements

In exceptional circumstances, changes in programme priorities, funding availability, restructuring, or other organizational considerations may necessitate the discontinuation of a position. In such cases, Prabhat will endeavour to provide reasonable notice and support in accordance with contractual commitments and organizational policies.

Serious Misconduct

Prabhat maintains a zero-tolerance approach towards serious misconduct.

Acts that may constitute serious misconduct include, but are not limited to:

- Child safeguarding violations.
- Abuse, neglect, or exploitation of beneficiaries.
- Sexual harassment or gender-based misconduct.
- Fraud, theft, corruption, or financial irregularities.
- Violence, threats, or serious acts of intimidation.
- Breach of confidentiality causing harm to beneficiaries or the organization.
- Deliberate damage to organizational property.

- Repeated and willful violation of organizational policies.

Where allegations of serious misconduct arise, the organization will undertake a fair and confidential inquiry. Depending on the findings, disciplinary action may include suspension, termination of employment, or legal action where applicable.

The organization reserves the right to terminate employment without notice in cases of proven gross misconduct, subject to applicable laws and due process.

1.3.Code of conduct and professional behaviour

At Prabhat Education Foundation, every team member plays an important role in creating a safe, inclusive, respectful, and supportive environment for colleagues, beneficiaries, families, volunteers, partners, and visitors.

All employees, consultants, interns, fellows, volunteers, Board members, and any individual representing the organization are expected to uphold the highest standards of professional and ethical conduct.

1.3.1. Expected standards of conduct

All team members shall:

- Treat all individuals with dignity, respect, courtesy, and empathy.
- Promote an inclusive environment free from discrimination based on disability, gender, caste, religion, ethnicity, age, sexual orientation, socio-economic background, or any other personal characteristic.
- Conduct themselves in a professional and ethical manner at all times.
- Uphold the rights, safety, and well-being of children and adults with disabilities.
- Comply with the organization's Child Protection Policy, Disability Safeguarding Policy, and Prevention of Sexual Harassment (POSH) Policy.
- Maintain confidentiality of organizational, beneficiary, and employee information unless disclosure is authorized or legally required.
- Use organizational resources responsibly and solely for legitimate organizational purposes.
- Be honest, transparent, and accountable in their actions and decision-making.
- Maintain professional boundaries with beneficiaries, families, and community members.
- Foster teamwork, collaboration, and mutual support within the workplace.
- Report any concerns related to abuse, neglect, exploitation, harassment, discrimination, fraud, or unethical conduct through the appropriate channels.
- Respect cultural diversity and demonstrate sensitivity while working with different communities.

1.3.2. Behaviour not tolerated

The following behaviours are inconsistent with Prabhat's values and may result in disciplinary action:

- Harassment, bullying, intimidation, or threatening behaviour.
- Physical, emotional, verbal, sexual, or psychological abuse.
- Discrimination or derogatory remarks based on disability, gender, religion, caste, ethnicity, age, or sexual orientation.
- Any form of child abuse, neglect, exploitation, or safeguarding violation.
- Sexual harassment as defined under the organization's POSH Policy.
- Fraud, theft, corruption, misappropriation of funds, or misuse of organizational resources.

- Breach of confidentiality.
- Substance abuse that adversely affects workplace conduct or performance.
- Misrepresentation of the organization or misuse of one's position for personal gain.
- Any behaviour that compromises the safety, dignity, or reputation of beneficiaries, colleagues, or the organization.

Prabhat is committed to maintaining a workplace where every individual feels safe, valued, respected, and empowered to contribute meaningfully.

2. Volume 2: Comprehensive safeguarding framework

2.1. Employee rights, welfare and organizational commitments

Prabhat Education Foundation is committed to creating a workplace that is fair, inclusive, respectful, and compliant with applicable laws and regulations. The organization recognizes that its team members are its greatest asset and is committed to ensuring their well-being, professional growth, and protection of their rights.

2.1.1. Fair Compensation and minimum wages

Prabhat is committed to providing fair and equitable compensation to all employees.

- Compensation shall be determined based on qualifications, experience, role requirements, responsibilities, performance, and available organizational resources.
- Under no circumstances shall compensation fall below the minimum wages prescribed under applicable Central and State Government laws.
- Salaries shall be paid in a timely manner and in accordance with the terms specified in the appointment letter or contract.
- The organization shall strive to maintain internal equity and transparency in compensation practices.

2.1.2. Employee benefits and welfare

Prabhat values the well-being of its employees and endeavours to provide a supportive work environment.

Employee welfare provisions may include:

- Annual leave and public holidays as per organizational policy.
- Maternity leave and other statutory benefits as required under applicable laws.
- Reasonable accommodations for employees with disabilities.
- Opportunities for professional development and capacity building.
- Wellness initiatives, including workshops, counselling referrals, and team well-being activities.
- Annual team retreats and team-building activities, subject to organizational resources.
- Safe and healthy working conditions.
- Access to grievance and complaint redressal mechanisms.

The organization may periodically introduce additional welfare measures based on employee needs and available resources.

2.1.3. Workplace grievance and complaint redressal mechanism

Prabhat is committed to maintaining a workplace where employees feel heard, respected, and supported.

Any employee who experiences or witnesses' concerns relating to workplace conduct, unfair treatment, discrimination, harassment, conflict, or policy violations may raise a grievance without fear of retaliation.

Grievance process

1. The employee should first attempt to resolve the concern through discussion with the immediate supervisor where appropriate.
2. If the matter remains unresolved or involves the supervisor, the concern may be escalated to the Director or designated authority.
3. Complaints relating to sexual harassment shall be addressed through the Internal Committee constituted under the Prevention of Sexual Harassment (POSH) Act, 2013.
4. All grievances shall be handled confidentially and impartially.
5. No employee shall face retaliation for raising a genuine concern in good faith.

The organization shall make reasonable efforts to address grievances promptly and fairly.

2.1.4. Performance review and professional development

Prabhat believes that regular feedback and professional development contribute to both individual and organizational growth.

Performance reviews may be conducted periodically to:

- Assess achievements and challenges.
- Review progress against agreed responsibilities and objectives.
- Identify learning and development needs.
- Provide constructive feedback and support.
- Recognize contributions and accomplishments.
- Facilitate career growth and professional advancement.

The performance review process shall be conducted in a fair, transparent, and respectful manner.

2.1.5. Confidentiality and non-disclosure

In the course of their engagement with Prabhat, team members may have access to confidential information relating to beneficiaries, families, employees, donors, partners, financial records, medical information, assessments, and organizational operations.

All employees, consultants, interns, volunteers, and fellows are required to:

- Maintain confidentiality of information obtained through their work.
- Use information only for authorized organizational purposes.
- Protect personal data and sensitive records from unauthorized access or disclosure.
- Refrain from sharing beneficiary information, photographs, case details, or organizational documents without prior authorization.

These obligations shall continue even after separation from the organization. Any breach of confidentiality may result in disciplinary action and, where applicable, legal consequences.

2.1.6. Transparent separation and termination procedures

Prabhat is committed to ensuring that all separation and termination processes are conducted fairly, respectfully, and transparently.

Before any termination related to performance concerns, reasonable efforts shall be made to:

- Provide feedback and clarification of expectations.

- Offer support, mentoring, or training where appropriate.
- Allow sufficient opportunity for improvement.

2.1.7. Termination may occur due to:

- Voluntary resignation.
- Completion of contract or project.
- Non-performance despite reasonable support.
- Organizational restructuring or funding constraints.
- Proven misconduct or safeguarding violations.

Employees shall be informed of the reasons for termination and applicable notice periods as per their contract and relevant laws, except in cases of gross misconduct where immediate termination may be warranted.

2.1.8. Compliance with employment and labour laws

Prabhat Education Foundation shall comply with all applicable labour, employment, and workplace-related laws of India and the State of Gujarat, as amended from time to time.

These include, but are not limited to:

- The Code on Wages, 2019.
- The Occupational Safety, Health and Working Conditions Code, 2020.
- The Code on Social Security, 2020.
- The Industrial Relations Code, 2020 (where applicable).
- The Rights of Persons with Disabilities Act, 2016.
- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Maternity Benefit Act, 1961 (as amended).
- The Payment of Gratuity Act, 1972 (where applicable).
- The Equal Remuneration principles incorporated under current labour laws.
- Child safeguarding and protection laws, including the Protection of Children from Sexual Offences (POCSO) Act, 2012.

The organization shall ensure that its policies, procedures, and practices remain aligned with applicable legal requirements and shall revise them periodically as required.

2.2. Child protection and safeguarding policy

Prabhat Education Foundation is committed to creating and maintaining a safe, nurturing, and inclusive environment where every child is respected, protected, and empowered to realize their full potential.

The organization recognizes that every child has the right to protection from all forms of violence, abuse, neglect, exploitation, discrimination, and harmful practices, irrespective of age, gender, disability, religion, caste, ethnicity, socio-economic status, sexual orientation, or any other characteristic.

Prabhat adopts a zero-tolerance approach towards child abuse, exploitation, neglect, and any behaviour that compromises the safety, dignity, or well-being of a child.

This policy applies to all employees, consultants, interns, fellows, volunteers, Board members,

visitors, contractors, donors, and any individual representing or associated with Prabhat Education Foundation.

Prabhat believes that:

- Every child has the right to be safe and protected.
- The best interests of the child shall be the primary consideration in all decisions affecting children.
- All children should be treated with dignity, respect, and fairness.
- Children with special needs may face increased vulnerability and require additional safeguards.
- Safeguarding is everyone's responsibility.
- Concerns raised in good faith must be taken seriously and acted upon promptly.
- Confidentiality must be maintained while ensuring the safety of the child.

2.2.1. Legal framework

This policy is guided by:

- The Constitution of India.
- The United Nations Convention on the Rights of the Child (UNCRC).
- The Protection of Children from Sexual Offences (POCSO) Act, 2012.
- The Juvenile Justice (Care and Protection of Children) Act, 2015.
- The Rights of Persons with Disabilities Act, 2016.
- The Right of Children to Free and Compulsory Education Act, 2009.
- Any other applicable child protection laws and regulations.

All staff and representatives of Prabhat are expected to comply with these laws and with the standards established under this policy.

2.2.2. Purpose

The purpose of this policy is to:

- Protect children from abuse, neglect, exploitation, and harm.
- Promote a culture of safeguarding and accountability.
- Ensure all team member understand their responsibilities towards children.
- Establish clear procedures for preventing, reporting, and responding to child protection concerns.
- Promote children's rights, participation, dignity, and well-being.

2.2.3. Roles and responsibilities for:

Governance and administration

The Governing Board, Director, and designated safeguarding team member shall:

- Act as custodians of this policy.
- Ensure adequate systems, procedures, and resources are available for implementation.
- Ensure that all team member receive orientation and periodic safeguarding training.
- Promote a culture of child safety and accountability.
- Ensure concerns are addressed promptly, fairly, and confidentially.
- Review and update this policy periodically (once every year).

All employees, consultants, interns, fellows and volunteers

Every individual associated with Prabhat has a duty of care towards children and shall:

- Read, understand, and comply with this policy.
- Maintain professional and appropriate behaviour around children.

- Immediately report any concern, suspicion, allegation, disclosure, or incident relating to child abuse or harm.
- Participate in mandatory safeguarding training.
- Promote children's rights and well-being in all interactions.

Failure to report a safeguarding concern may constitute serious misconduct and may result in disciplinary action.

Volunteers and visitors

All volunteers and visitors shall:

- Undergo orientation on safeguarding requirements.
- Sign relevant declarations and code of conduct forms.
- Remain under supervision when interacting with children.
- Comply with all child protection requirements during their engagement.

2.2.4. Preventive measures

Prabhat shall:

- Conduct reference and background checks for employees and volunteers wherever feasible.
- Include safeguarding responsibilities in job descriptions and contracts.
- Provide regular child protection training and awareness programmes.
- Ensure safe physical and emotional environments in all centres and programmes.
- Promote awareness of child rights among children, families, staff, and communities.
- Encourage open communication and reporting without fear of retaliation.
- Ensure accessible reporting mechanisms for children, including children with special needs.

2.2.5. Child protection code of conduct

All team member must always act in the best interests of the child.

Team member shall never:

- Physically, emotionally, verbally, or sexually abuse a child.
- Use humiliating, degrading, threatening, or discriminatory language.
- Develop exploitative or inappropriate relationships with children.
- Engage in any behaviour that may be perceived as abusive, coercive, or manipulative.
- Spend unnecessary time alone with a child in a closed or isolated setting.
- Invite children to their home or private accommodation without organizational approval and parental consent.
- Engage in any sexual activity, contact, or communication with a child.
- Exchange gifts, money, or personal favours that may create dependency or inappropriate influence.
- Promise secrecy when a child's safety may be at risk.
- Share personal contact information or communicate privately with children through personal social media platforms unless explicitly authorized for programme purposes.

Team member shall always:

- Treat children with dignity and respect.
- Maintain professional boundaries.
- Ensure activities take place in visible and accountable environments.
- Listen to children respectfully and take their concerns seriously.
- Promote participation and inclusion, especially for children with special needs .

- Immediately report concerns regarding child safety.

2.2.6. Photography, media and digital safety

Photographs, videos, case studies, and digital content involving children shall only be used in a manner that preserves the child's dignity, privacy, and safety.

Team member/visitors/interns/volunteers shall:

- Obtain informed consent from parents or legal guardians before capturing or using images.
- Avoid using images that may expose a child to risk or embarrassment.
- Refrain from sharing children's personal information online.
- Use organizational devices and platforms for official documentation wherever possible.
- Visitors/interns/volunteers may only click photographs of a child with prior permission from a senior staff member.

2.2.7. Reporting and responding to concerns

Any individual who:

- Witnesses abuse,
- Suspects abuse,
- Receives a disclosure from a child,
- Observes inappropriate behaviour,
- Becomes aware of a safeguarding risk,

must immediately report the concern to their Supervisor, Team Leader, or Director.

The safety of the child shall always take precedence over concerns about reputation, relationships, or organizational image.

If You Witness or Suspect Abuse

Do:

- Stay calm and listen carefully.
- Reassure the child that they have done the right thing by speaking up.
- Record factual information.
- Report the concern immediately.

Do not:

- Promise confidentiality that cannot be maintained.
- Conduct your own investigation.
- Confront the alleged perpetrator.
- Share information with unauthorized individuals.

2.2.8. Investigation and response

Upon receiving a concern:

- The designated safeguarding lead shall conduct a preliminary assessment.
- Immediate protective measures shall be taken where necessary.
- Reporting obligations under applicable laws, including POCSO, shall be followed.
- Appropriate authorities shall be informed where legally required.
- The privacy and dignity of all parties shall be respected.

Protection from retaliation

No employee, volunteer, child, parent, or stakeholder shall be penalized, victimized, or retaliated against for reporting a safeguarding concern in good faith.

2.2.9. Breach of policy

Any violation of this policy may result in:

- Corrective action.
- Disciplinary proceedings.
- Suspension.
- Termination of employment or engagement.
- Reporting to statutory authorities.
- Legal action where required.

Prabhat Education Foundation maintains a zero-tolerance approach towards child abuse and safeguarding violations and will act decisively to protect the rights, safety, and dignity of every child.

2.3.Safeguard for children with special needs

Prabhat Education Foundation recognizes that children with special needs may face heightened risks of abuse, neglect, exploitation, bullying, discrimination, and social exclusion.

Communication barriers, dependency on caregivers, limited awareness of their rights, and challenges in reporting concerns may further increase their vulnerability.

In accordance with the Rights of Persons with Disabilities Act, 2016, and Prabhat's commitment to inclusion and dignity, the organization shall take additional measures to ensure the safety and well-being of children with special needs.

Prabhat shall:

- Ensure that all safeguarding practices are disability-inclusive and responsive to the diverse needs of children with physical, intellectual, developmental, sensory, psychosocial, and multiple disabilities.
- Promote an environment where children with special needs are treated with dignity, respect, patience, and understanding.
- Ensure that information relating to rights, safety, complaints, and reporting mechanisms is communicated in accessible and age-appropriate formats.
- Encourage the active participation of children with special needs in decisions affecting their education, care, and well-being, in accordance with their evolving capacities.
- Provide reasonable accommodations to enable children with special needs to participate safely and meaningfully in all programmes and activities.
- Take steps to prevent bullying, discrimination, social isolation, and exclusion within centres, schools, communities, and programme settings.
- Ensure that children with special needs have access to trusted adults with whom they can share concerns or seek support.
- Work closely with families, caregivers, educators, therapists, and community members to strengthen protective environments around children.
- Regularly assess programme spaces, transportation arrangements, and activities to identify and mitigate potential risks for children with special needs.

Staff and team members shall:

- Be sensitive to the specific communication and support needs of each child.

- Recognize that changes in behaviour, emotional responses, withdrawal, aggression, fear, or regression may sometimes indicate distress, abuse, or neglect.
- Use appropriate communication methods and support systems to enable children to express their views and concerns.
- Never assume that a child with a disability is unable to understand, communicate, or report abuse.
- Respect the privacy, personal space, and bodily autonomy of every child.
- Seek informed assent from the child, wherever possible, before providing assistance, while ensuring their safety and well-being.
- Report any concerns relating to abuse, neglect, exploitation, inappropriate restraint, discrimination, or denial of rights immediately through the safeguarding reporting mechanism.

Additional prohibited conduct

In addition to the Child Protection Code of Conduct, no employee, volunteer, consultant, intern, or visitor shall:

- Use a child's disability as a reason to ignore, dismiss, or minimize allegations of abuse or neglect.
- Restrict, isolate, intimidate, ridicule, or punish a child because of their disability or support needs.
- Use inappropriate physical restraint, coercion, force, or threats except in situations involving immediate risk to the child or others and only in accordance with approved procedures.
- Deny a child access to assistive devices, communication aids, mobility equipment, therapy, education, or support services as a form of punishment or control.
- Make derogatory, stigmatizing, or discriminatory remarks about a child's disability, abilities, or support needs.

Prabhat is committed to ensuring that every child, including every child with a disability, grows up in an environment that is safe, inclusive, empowering, and free from abuse, neglect, discrimination, and exploitation.

The organization is committed to ensuring that all team members are aware of their responsibilities under the Protection of Children from Sexual Offences (POCSO) Act, 2012, and related child safeguarding laws. To strengthen understanding and compliance, Prabhat shall conduct regular orientation and annual refresher sessions for all employees, consultants, interns, volunteers, and fellows. Wherever possible, these sessions will be facilitated by qualified external experts, legal professionals, child protection practitioners, or safeguarding specialists to enhance awareness of child rights, recognizing signs of abuse, mandatory reporting obligations, and appropriate response mechanisms.

2.4.Prevention of Sexual Harassment (POSH) Policy

Prabhat Education Foundation is committed to providing a safe, inclusive, equitable, and respectful work environment where every individual is treated with dignity and respect.

The organization has a zero-tolerance approach towards sexual harassment and is committed to preventing, prohibiting, and addressing any form of sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act).

Sexual harassment violates an individual's fundamental rights to equality, dignity, and a safe working environment. Such behaviour is inconsistent with Prabhat's values and will not be tolerated under any circumstances.

This policy applies to all those associated with Prabhat, including: Employees, consultants, interns, fellows, volunteers, Board Members, visitors, vendors and service providers, parents and caregivers, donors and partners, or any other person interacting with Prabhat staff or beneficiaries in the course of organizational activities.

The policy is applicable at: Prabhat centres and office, field locations and community settings, meetings, workshops, conferences, and trainings, organizational travel, social events organized by Prabhat, digital and virtual workspaces, including email, messaging platforms, video meetings, and social media interactions related to work

2.4.1. Definition of sexual harassment

Sexual harassment includes any unwelcome act or behaviour of a sexual nature, whether direct or implied, that interferes with an individual's work, creates an intimidating, hostile, degrading, humiliating, or offensive environment, or affects a person's dignity.

Sexual harassment may occur regardless of gender, age, position, disability, sexual orientation, or employment status.

Type of Conduct	Examples of Sexual Harassment
Physical Conduct	<ul style="list-style-type: none"> • Unwelcome touching, patting, hugging, kissing, stroking, or other forms of physical contact • Sexual assault or attempted sexual assault • Blocking a person's movement or deliberately invading personal space • Demanding or requesting sexual favours in exchange for employment benefits, opportunities, promotions, or favourable treatment.
Verbal Conduct	<ul style="list-style-type: none"> • Sexually suggestive comments, remarks, or conversations • Unwelcome compliments of a sexual nature • Sexual jokes, stories, innuendos, or remarks • Repeated requests for dates or personal meetings after refusal • Comments about a person's body, appearance, clothing, or private life • Offensive remarks related to gender, sexuality, marital status, or reproductive status.
Non-Verbal and Digital Conduct	<ul style="list-style-type: none"> • Staring, leering, or making sexually suggestive gestures. • Displaying sexually explicit or suggestive images, messages, screensavers, posters, or materials. • Sending inappropriate emails, text messages, social media messages, memes, photographs, videos, or other digital content of a sexual nature. • Sharing pornography or sexually explicit content in any form. • Repeatedly viewing, displaying, or circulating offensive material that creates an intimidating, hostile, or uncomfortable environment.

2.4.2. Special considerations for Persons with Disabilities

Prabhat recognizes that persons with disabilities may face increased vulnerability to harassment and abuse due to communication barriers, dependency relationships, or unequal power dynamics.

The organization shall:

- Ensure that complaint mechanisms are accessible to persons with disabilities.
- Provide reasonable accommodations during reporting and investigation processes.
- Ensure that complainants are able to communicate concerns using appropriate support systems where required.
- Maintain dignity, privacy, and accessibility throughout the process.

2.4.3. Internal Committee (IC)

In accordance with the POSH Act, 2013, Prabhat shall constitute an Internal Committee (IC) to receive and address complaints of sexual harassment.

The current IC includes:

- Divya Wesley - 9601827666
- Parul Patel - 9879475569
- Prof. Vrundani Patel – 7567910507
- Pranav Shah - 9327345229

(The committee consists of one presiding officer, 2 team members and one external member associated with another NGO)

2.4.4. Reporting a complaint

Any person who believes they have experienced sexual harassment may submit a complaint to the Internal Committee.

Complaints may be submitted:

- In writing
- By email
- Through a designated Committee member
- Through an authorized representative where the complainant is unable to file independently

Under the POSH Act, complaints should ordinarily be filed within three months of the incident, although extensions may be considered where justified.

2.4.5. Complaint resolution process

Informal resolution

Where appropriate and only if requested by the complainant, the Internal Committee may facilitate an informal resolution process.

Informal resolution shall never involve monetary settlement.

The complainant may choose to discontinue informal proceedings and pursue a formal complaint at any stage.

Formal inquiry

Where a formal complaint is filed:

- The Internal Committee shall acknowledge receipt of the complaint.
- A fair, impartial, and confidential inquiry shall be conducted.
- Both parties shall be given an opportunity to present their version of events.
- Relevant witnesses and evidence may be considered.
- The principles of natural justice shall be followed throughout the process.

As prescribed under the POSH Act, the inquiry should ordinarily be completed within 90 days.

Following completion of the inquiry, recommendations shall be submitted to the management for implementation.

Interim relief

During the inquiry process, the Internal Committee may recommend measures such as:

- Temporary changes in reporting relationships.
- Transfer of either party.
- Leave for the complainant as permitted by law.
- Restrictions on direct contact between parties.
- Other measures necessary to protect the complainant.

2.4.6. Confidentiality

Prabhat shall maintain strict confidentiality throughout the complaint process.

Information relating to:

- The identity of the complainant.
- The identity of the respondent.
- Witness statements.
- Inquiry proceedings.
- Recommendations and outcomes.

shall not be disclosed except as required by law.

Any breach of confidentiality may attract disciplinary action.

2.4.7. Protection against retaliation

No employee, volunteer, intern, consultant, parent, beneficiary, or stakeholder shall be subjected to retaliation, victimization, intimidation, discrimination, or adverse treatment for:

- Reporting sexual harassment in good faith.
- Participating in an inquiry.
- Supporting a complainant or witness.

Retaliation shall itself constitute misconduct and may result in disciplinary action.

2.4.8. Consequences of sexual harassment

Where allegations are substantiated, disciplinary action may include:

- Written warning.
- Mandatory counselling or training.
- Suspension.
- Termination of employment or engagement.
- Removal from volunteer or consultant roles.
- Reporting to relevant authorities where required by law.

The nature of the action shall be proportionate to the severity of the misconduct.

2.4.9. Awareness and prevention

Prabhat is committed to fostering a workplace culture based on respect, dignity, equality, and inclusion.

To support prevention, the organization shall:

- Conduct regular awareness and sensitization programmes.
- Provide POSH orientation to all new employees, interns, volunteers, and consultants.
- Promote gender-sensitive and disability-inclusive workplace practices.
- Ensure that all personnel understand their rights and responsibilities under this policy.

Every individual associated with Prabhat shares responsibility for creating a workplace free from harassment, discrimination, intimidation, and abuse.

2.5. Anti-bullying and anti-discrimination policy

Prabhat Education Foundation believes that every individual has the right to be treated with dignity, fairness, and respect, irrespective of their age, gender, disability, caste, religion, ethnicity, socio-economic status, language, marital status, sexual orientation, educational background, or any other personal characteristic.

Prabhat maintains a zero-tolerance approach towards bullying, discrimination, harassment, victimization, exclusion, and any behaviour that undermines an individual's dignity, well-being, participation, or sense of belonging.

This policy applies to all organizational settings, including the Head office, centres, community programmes, field visits, meetings, training programmes, online interactions, and organizational events.

Prabhat believes that:

- Every individual deserves to be treated with dignity and respect.
- Diversity strengthens organizations and communities.
- Inclusion is not only about access but also about meaningful participation and belonging.
- Bullying and discrimination can have serious emotional, psychological, social, and professional consequences.
- Children and persons with disabilities may be particularly vulnerable to exclusion and mistreatment and require additional safeguards.
- Everyone has a responsibility to contribute to a respectful and inclusive environment.

2.5.1. Bullying

Bullying refers to repeated or serious behaviour that intentionally or unintentionally causes physical, emotional, psychological, social, or professional harm to another person. Bullying may be verbal, physical, emotional, social, written, or digital.

Zero tolerance towards bullying through:

- Shouting, insulting, humiliating, or ridiculing a person.
- Repeated criticism intended to demean rather than support improvement.
- Threatening or intimidating behaviour.
- Deliberately excluding someone from activities, meetings, or opportunities.
- Spreading rumours or gossip.
- Mocking a person's disability, appearance, speech, background, or identity.
- Deliberately withholding information necessary for a person to perform their role.
- Cyberbullying through messages, emails, social media, or digital platforms.
- Encouraging others to isolate or mistreat an individual.

A single serious incident that causes significant harm may also be treated as bullying.

2.5.2. Discrimination

Discrimination occurs when an individual is treated unfairly, excluded, disadvantaged, denied opportunities, or subjected to prejudicial treatment because of a personal characteristic.

Discrimination may be direct, indirect, systemic, intentional, or unintentional.

Prabhat prohibits discrimination based on, but not limited to: Disability, gender, age, religion or belief, caste, tribe, ethnicity, language, nationality, marital status, socio-economic background, sexual orientation, gender identity, health condition, educational background, family status.

2.5.3. Special commitment to disability inclusion

As an organization working with children and adults with disabilities, Prabhat is committed to actively challenging stigma, prejudice, and discrimination related to disability.

No individual shall be:

- Excluded from participation because of a disability.
- Subjected to ridicule, stereotyping, or derogatory language.
- Denied reasonable accommodation where feasible.
- Treated unfairly because of their support needs or abilities.

Prabhat shall make reasonable efforts to ensure accessibility, participation, and equal opportunity for persons with disabilities across its programmes and workplace.

2.5.4. Expected standards of behaviour

All individuals (team members, visitors, interns, volunteers, donors, caregivers) associated with Prabhat are expected to:

- Treat others with dignity, courtesy, and respect.
- Value diversity and different perspectives.
- Use inclusive and respectful language.
- Promote participation and belonging.
- Respect personal boundaries.
- Demonstrate patience and empathy, particularly when working with children and persons with disabilities.
- Challenge discriminatory attitudes and behaviours constructively.
- Report incidents of bullying, discrimination, harassment, or exclusion.

2.5.5. Management responsibilities

Stakeholder group	Responsibilities
Prabhat Leadership (Board, Director, and Management Team)	<ul style="list-style-type: none"> • Promote and model an inclusive, safe, and respectful organizational culture. • Ensure awareness and implementation of this policy across the organization. • Respond promptly, fairly, and confidentially to complaints and concerns. • Take appropriate corrective and disciplinary action where required. • Protect complainants, witnesses, and other involved persons from retaliation or victimization. • Ensure that reporting and complaint mechanisms are accessible, including for persons with

Stakeholder group	Responsibilities
Employees, Consultants, Interns, Fellows, and Volunteers	<p>disabilities. • Facilitate regular awareness, training, and sensitization programmes.</p> <p>• Read, understand, and comply with this policy at all times. • Treat colleagues, beneficiaries, families, and community members with dignity and respect. • Refrain from engaging in any form of harassment, discrimination, or inappropriate conduct. • Report concerns, incidents, or violations promptly through the designated channels. • Cooperate fully and honestly with investigations and inquiries. • Contribute to a positive, inclusive, and professional work environment.</p>
Parents, Caregivers, Visitors, and External Stakeholders	<p>• Respect the dignity, rights, and privacy of all staff, beneficiaries, and community members. • Conduct themselves appropriately while participating in or visiting Prabhat programmes and facilities. • Refrain from any form of harassment, discrimination, intimidation, or inappropriate behaviour. • Report concerns relating to safety, harassment, or misconduct through the appropriate channels. • Support Prabhat's commitment to creating safe and inclusive environments for all.</p>

2.5.6. Reporting concerns

Any person who experiences, witnesses, or becomes aware of bullying, discrimination, or exclusion is encouraged to report the concern.

Concerns may be reported to: Immediate supervisor, Director

Reports may be made verbally or in writing. The organization shall take all concerns seriously and respond appropriately.

2.5.7. Investigation and resolution

Upon receiving a complaint:

- The concern shall be reviewed promptly.
- All parties shall be treated fairly and respectfully.
- Confidentiality shall be maintained to the greatest extent possible.
- Appropriate inquiries shall be conducted.
- Corrective or disciplinary action shall be taken where necessary.

Where appropriate, informal resolution, mediation, counselling, or facilitated dialogue may be considered, provided the complainant agrees and the matter is suitable for such an approach.

Protection against retaliation

No person shall be subjected to retaliation, intimidation, victimization, or adverse treatment for:

- Reporting a concern in good faith.
- Participating in an investigation.

- Supporting another person making a complaint.

Retaliation shall be treated as a serious breach of this policy.

2.5.8. Consequences of violations

Depending on the severity and nature of the conduct, actions may include: Verbal counselling, written warning, mandatory training or sensitization, mediation or corrective action, suspension, termination of employment or engagement, restriction from participation in organizational programmes, referral to legal authorities where required.

2.5.9. Awareness and capacity building

Prabhat shall periodically conduct awareness and sensitization programmes on:

- Diversity, equity, and inclusion.
- Disability rights and inclusion.
- Respectful communication.
- Bullying prevention.
- Anti-discrimination practices.
- Safeguarding and protection.

The organization is committed to creating an environment where every individual feels safe, valued, heard, respected, and empowered to participate fully without fear of discrimination, exclusion, or bullying.

3. Volume 3: Intellectual Property (IP), Copyright and Trademark Policy

Prabhat Education Foundation invests significant time, knowledge, expertise, resources, and collective effort in developing programmes, training materials, research studies, publications, methodologies, educational content, communication materials, digital resources, and other intellectual assets.

The purpose of this policy is to protect the intellectual property rights of the organization while ensuring that appropriate recognition is provided to individuals who contribute to the creation of such work.

This policy establishes ownership, usage, authorship, copyright, trademark protection, and licensing arrangements relating to intellectual property created during the course of engagement with Prabhat.

This policy applies to all: Employees, consultants, interns, fellows, volunteers, Board Members, researchers, trainers, external collaborators, partner organizations engaged in joint projects

3.1.Scope of Intellectual Property

For the purposes of this policy, Intellectual Property (IP) includes, but is not limited to:

Written materials including: Research reports, publications, position papers, policy briefs, training manuals, toolkits, curriculum materials, case studies, assessment tools, monitoring and evaluation frameworks, grant proposals, concept notes, articles and papers.

Educational and programme materials including: Teaching-learning materials (TLMs), therapy resources, vocational training modules, learning aids, assessment formats, community mobilization tools, awareness materials.

Creative and communication assets including: Photographs, videos, podcasts, graphics, designs, infographics, presentations, social media content, website content.

Organizational assets including: Logos, taglines, brand identifiers, proprietary methodologies, databases, digital content, software applications developed for the organization

Ownership of intellectual property

3.1.1. Intellectual property created by employees:

Any intellectual property created by an employee during the course of employment, using organizational resources, organizational data, beneficiary information, programme experience, or within the scope of their assigned responsibilities shall be the exclusive property of Prabhat Education Foundation.

This includes work created:

- During working hours.
- As part of assigned responsibilities.
- Using organizational resources or funding.
- On behalf of the organization.

The employee shall not claim exclusive ownership or independent commercial rights over such work.

3.1.2. Intellectual property created by consultants

Unless otherwise specified through a written agreement, all intellectual property created by consultants as part of an assignment commissioned and paid for by Prabhat shall become the property of Prabhat Education Foundation upon completion and payment of the assignment.

Consultants may not reproduce, publish, distribute, or commercially exploit such materials without prior written permission from the organization.

3.1.3. Intellectual property created by interns, fellows and volunteers

All intellectual property created by interns, fellows, and volunteers as part of their engagement with Prabhat shall belong to the organization unless otherwise agreed in writing.

The organization may use, adapt, publish, reproduce, or distribute such materials without further permission, while acknowledging contributors where appropriate.

3.1.4. Authorship and acknowledgement

Prabhat believes in collective ownership of credits and criticism of work. We respect collective processes for knowledge making. Traditionally, the documents produced by Prabhat are never branded by any individual. All submissions are in the name of the organisation. The issue of authorship should never arise. There are some instances where we have to put names in which case all names involved in the process including of people involved in providing administrative support are added to the document.

The need for defining authorship policy is conceived, based on the primary principle that people who work in the field are the ones who inform our writings and hence must be given equal space and acknowledgement.

The following principles are adhered to regarding all publications/documents

- Equal opportunity for participation;
- Every time an invite is received, a call received, a discussion on how do we increase our presence for the event has to be explored.
- When deciding between individual/collective/institutional authorship, parameters have to be context specific.
- Institutional visibility is a priority.

3.1.5. Organizational ownership

Regardless of authorship attribution:

- Copyright shall remain with Prabhat Education Foundation.
- The organization shall retain the right to publish, revise, translate, adapt, reproduce, distribute, or repurpose the material.
- Individual contributors shall not independently publish or commercially exploit the work without written permission.

3.1.6. Citation format

Publications may include the following statement:

"Copyright © Prabhat Education Foundation. All rights reserved. Authorship and contributions have been acknowledged; however, ownership of the publication and associated intellectual property rests with Prabhat Education Foundation."

3.2. Copyright protection

Prabhat shall retain copyright over all original materials created by or for the organization unless expressly agreed otherwise in writing.

Copyright protection shall apply to: Publications, research reports, training manuals, case studies, educational materials, communication materials, photographs and videos, website content, databases, digital resources

The organization may:

- Register copyrights where deemed necessary.
- Include copyright notices in all publications.
- Monitor unauthorized use of organizational content.
- Take appropriate legal action in cases of infringement.

3.3. Research, Case Studies and Data Ownership

All data collected through organizational programmes, surveys, assessments, research studies, monitoring activities, and evaluations shall remain the property of Prabhat Education Foundation.

This includes:

- Beneficiary information
- Survey data
- Interview transcripts
- Assessment findings

- Programme databases
- Monitoring records
- Research outputs

No employee, consultant, volunteer, or researcher may use organizational data for personal publication, academic submission, conference presentations, or external dissemination without prior written approval from the organization.

Where data relates to children or persons with disabilities, all confidentiality and safeguarding requirements shall continue to apply.

3.4.Trademark protection

The name "Prabhat Education Foundation", its logo, tagline(s), programme identities, and other registered or unregistered brand assets constitute valuable intellectual property of the organization.

Prabhat shall:

- Pursue trademark registration of its name, logo, and key brand identifiers wherever appropriate.
- Protect its trademarks from unauthorized use.
- Establish guidelines for the use of organizational branding.

No person may: Modify the logo, use the logo for personal purposes, create derivative logos, use the organization's branding without authorization.

Permission must be obtained before the logo is reproduced on external materials, websites, publications, presentations, merchandise, or promotional items.

3.5.Use of organizational intellectual property

Employees and associated personnel may use organizational materials only for legitimate organizational purposes.

Without written authorization, no individual shall:

- Sell organizational content.
- License organizational content to third parties.
- Publish unpublished organizational materials externally.
- Share proprietary tools or methodologies.
- Use organizational intellectual property for private commercial gain.

3.6.Joint ownership and collaborative projects

Where intellectual property is developed jointly with another organization, academic institution, donor, or partner agency, ownership arrangements shall be clearly documented through:

- Memoranda of Understanding (MoUs)
- Research agreements
- Consultancy contracts
- Collaboration agreements

The agreement shall specify: Ownership rights, publication rights, branding requirements, revenue-sharing arrangements (if applicable), data ownership.

3.7. Confidentiality and intellectual property

All personnel shall maintain confidentiality regarding:

- Unpublished research
- Draft reports
- Proprietary methodologies
- Programme strategies
- Financial information
- Beneficiary data

Confidential information may not be disclosed without authorization even after separation from the organization.

3.8. Intellectual property after separation

Upon separation from Prabhat:

- All intellectual property created during engagement shall remain the property of the organization.
- Former employees, consultants, volunteers, or interns may not remove, reproduce, publish, or distribute organizational intellectual property without written permission.
- Any ongoing obligations relating to confidentiality, copyright, and intellectual property shall continue beyond the period of engagement.

3.9. Policy violations

Unauthorized use, disclosure, reproduction, plagiarism, misappropriation, or commercial exploitation of organizational intellectual property may result in:

- Corrective action
- Disciplinary proceedings
- Termination of engagement
- Recovery of losses or damages
- Legal action under applicable intellectual property laws

3.10. Review and amendment

This policy shall be reviewed periodically to ensure compliance with applicable intellectual property laws, organizational needs, and emerging forms of intellectual property and digital content.

Prabhat Education Foundation remains committed to protecting its intellectual assets while fostering a culture of collaboration, innovation, recognition, and responsible knowledge sharing.

4. Volume 4: Cybersecurity and Information Technology (IT) Policy

Prabhat Education Foundation recognizes the importance of protecting its digital systems, organizational information, beneficiary data, financial records, research materials, and intellectual property from unauthorized access, misuse, loss, theft, cyberattacks, and data breaches.

As an organization working with children, persons with disabilities, families, donors, volunteers, and community stakeholders, Prabhat has a responsibility to ensure that information is collected, stored, used, and shared securely and ethically.

This policy establishes the standards and responsibilities for the safe use of information technology systems, digital devices, communication platforms, and organizational data.

Prabhat is committed to:

- Confidentiality: Information shall only be accessible to authorized individuals.
- Integrity: Information shall be accurate, complete, and protected from unauthorized modification.
- Availability: Information and systems shall be accessible to authorized users when needed.
- Accountability: Users are responsible for protecting organizational information and systems.
- Privacy: Personal information shall be handled with care and respect.

The policy applies to all: Employees, consultants, volunteers, interns, fellows, Board Members, contractors, vendors with access to organizational systems, any individual using organizational IT resources or accessing organizational data.

Information assets covered under this policy

This policy applies to all organizational information, including:

Category	Information Assets Covered
Beneficiary Information	• Child records • Disability assessments • Therapy records • Individual Education Plans (IEPs) • Family information • Medical information • Photographs and videos
Organizational Information	• Financial records • Donor information • Employee records • Programme documentation • Research reports • Monitoring and evaluation data • Strategic plans • Intellectual property
Digital Resources	• Computers and laptops • Mobile phones • Tablets • External storage devices • Email accounts • Cloud storage systems • Databases • Websites • Social media platforms

Roles and responsibilities

Management shall:

- Ensure appropriate cybersecurity measures are in place.
- Provide resources for secure technology systems.

- Conduct periodic reviews of cybersecurity risks.
- Respond appropriately to cybersecurity incidents.

All users shall:

- Protect organizational information.
- Follow cybersecurity procedures.
- Report suspected security incidents immediately.
- Use technology responsibly and ethically.
- Participate in cybersecurity awareness training.

4.1.Password and account security

All users shall:

- Create strong passwords containing a combination of letters, numbers, and special characters.
- Avoid using easily guessable passwords.
- Use different passwords for different systems.
- Change passwords periodically.
- Enable Multi-Factor Authentication (MFA) wherever available.
- Keep passwords confidential.

Users shall never:

- Share passwords with others.
- Write passwords in publicly accessible locations.
- Use another person's account.
- Allow unauthorized access to organizational systems.

4.2.Acceptable use of technology

Organizational technology resources are provided primarily for official purposes.

Users shall

Use organizational devices responsibly.

Protect devices from loss, theft, misuse, or damage.

Use only authorized software, applications, and digital tools.

Follow organizational policies regarding internet, email, and digital communications.

Ensure that organizational resources are used primarily for official purposes.

Report any security concerns, suspicious activity, or device compromise immediately.

Users shall not

Download illegal, offensive, discriminatory, or inappropriate content.

Access websites that may compromise organizational security.

Install unauthorized software, applications, or plugins.

Use organizational systems for unlawful, unethical, or unauthorized activities.

Circumvent, disable, or interfere with security controls, monitoring systems, or access restrictions.

Share passwords, user credentials, or unauthorized access to organizational systems.

Reasonable personal use may be permitted provided it does not interfere with work responsibilities or compromise organizational security.

4.3.Data Protection and confidentiality

All personnel shall:

- Access only information necessary for their work.
- Maintain confidentiality of beneficiary, employee, and organizational information.
- Store sensitive information securely.
- Share information only with authorized individuals.
- Use secure methods when transmitting confidential information.

Particular care shall be exercised when handling information relating to:

- Children
- Persons with disabilities
- Medical records
- Safeguarding concerns
- Financial information
- Research data

Confidential information shall not be stored on personal devices unless specifically authorized.

4.4.Email and Communication Security

Users shall:

- Use official email accounts for organizational communication.
- Verify recipients before sending sensitive information.
- Exercise caution when opening links or attachments.
- Report suspicious emails immediately.

Users shall not:

- Forward confidential information without authorization.
- Use organizational email accounts for inappropriate purposes.
- Share sensitive information through unsecured channels.

4.5.Protection against phishing and cyber threats

All personnel should remain alert to cyber threats including:

- Phishing emails
- Fraudulent messages
- Malware
- Ransomware
- Identity theft attempts
- Social engineering attacks

Signs of phishing may include:

- Requests for passwords.
- Requests for financial information.
- Unexpected attachments.
- Urgent or threatening messages.

Suspected phishing attempts must be reported immediately.

4.6. Device security

All organizational devices shall:

- Be protected with passwords or biometric authentication.
- Be updated regularly with security patches.
- Have antivirus and security software installed where applicable.
- Be locked when unattended.

Loss or theft of organizational devices must be reported immediately.

4.7. Remote work and mobile device security

Personnel working remotely shall:

- Use secure internet connections.
- Avoid public Wi-Fi when handling sensitive information.
- Secure devices when travelling.
- Prevent unauthorized individuals from accessing organizational information.

Where possible, VPNs and secure cloud platforms should be used.

4.8. Data backup and recovery

Prabhat shall:

- Maintain regular backups of critical organizational data.
- Store backups securely.
- Periodically test recovery procedures.
- Establish business continuity measures to minimize disruption.

4.9. Social media and online conduct

Personnel using social media shall:

- Respect confidentiality obligations.
- Avoid sharing beneficiary information without authorization.
- Refrain from making statements on behalf of the organization unless authorized.
- Uphold the reputation and values of Prabhat.

Photos, videos, and stories involving beneficiaries may only be shared in accordance with consent and safeguarding policies.

4.10. Use of Artificial Intelligence (AI) tools

The organization recognizes the increasing use of AI-based tools such as ChatGPT, Google Gemini and similar technologies.

Personnel may use approved AI tools for administrative and content development purposes, provided that:

- Confidential information is not uploaded.
- Beneficiary data is never entered into public AI platforms.
- Financial, safeguarding, medical, legal, or personal information is not disclosed.

- AI-generated content is reviewed for accuracy before use.

AI tools shall not replace professional judgment, safeguarding responsibilities, or decision-making processes.

4.11. Cybersecurity incident reporting

Any person who becomes aware of:

- Unauthorized access
- Data loss
- Data breach
- Malware infection
- Device theft
- Phishing attacks
- Suspected cyber incidents

must immediately report the matter to their supervisor and the designated IT or administrative focal person.

Prompt reporting enables the organization to minimize harm and take corrective action.

4.12. Data retention and disposal

The organization shall retain records only for as long as necessary for operational, legal, donor, or regulatory requirements.

When information is no longer required:

- Digital files shall be securely deleted.
- Physical documents shall be shredded or securely destroyed.
- Storage devices shall be wiped before disposal.

4.13. Breach of policy

Failure to comply with this policy may result in:

- Corrective action.
- Additional training.
- Restriction of system access.
- Disciplinary action.
- Termination of employment or engagement.
- Legal action where appropriate.

4.14. Review and awareness

Prabhat shall:

- Conduct periodic cybersecurity awareness sessions.
- Provide guidance on emerging cyber risks.
- Review this policy regularly.
- Update procedures as technology and risks evolve.

All personnel share responsibility for protecting the information, reputation, beneficiaries, and digital assets of Prabhat Education Foundation. Effective cybersecurity is essential to maintaining the trust placed in the organization by children, families, employees, donors, and communities.

5. Volume 5: Procurement and purchase policy

Prabhat Education Foundation is committed to ensuring that all purchases and procurement activities are conducted in a transparent, ethical, cost-effective, and accountable manner. The organization recognizes that all resources entrusted to it by donors, partners, supporters, and communities must be utilized responsibly and in the best interests of its mission and beneficiaries.

This policy establishes the principles, procedures, approval mechanisms, and responsibilities governing the procurement of goods, services, equipment, supplies, and works required for organizational operations and programme implementation.

The policy applies to all employees, consultants, project staff, and any person authorized to make purchases on behalf of Prabhat Education Foundation.

All procurement activities shall be guided by the following principles:

- **Transparency:** Procurement decisions shall be made openly and documented appropriately.
- **Value for money:** Purchases shall seek the best combination of quality, suitability, service, and cost.
- **Fair competition:** Qualified vendors shall be provided equal opportunity to participate wherever feasible.
- **Accountability:** Approvals and procurement decisions shall be made by authorized personnel.

Integrity

Team member (s) involved in procurement shall avoid conflicts of interest and maintain the highest ethical standards.

Sustainability and inclusion

Where feasible, preference may be given to local suppliers, social enterprises, cooperatives, women-led enterprises, and businesses owned by persons with disabilities, provided quality and cost considerations are met.

Procurement planning

Programme teams and departments shall plan procurement requirements in advance wherever possible.

Annual and project budgets should include estimated procurement requirements to facilitate timely purchasing and financial planning.

Unplanned or emergency purchases should be minimized and appropriately justified.

5.1. Approval authority matrix

The following approval levels may be adopted and revised periodically by management:

Procurement Value	Approval Authority
Up to ₹20,000	Coordinator
₹20,001 – ₹200,000	Director

Above ₹2,00,000	Director + Board member (s)
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The organization may revise thresholds based on operational requirements.

5.2. Procurement procedures

A. Small value purchases (Up to ₹20,000)

- A single quotation, market comparison, or reasonable price verification may be sufficient.
- Purchase approval must be obtained from the designated authority.
- Bills and supporting documentation must be retained.

Examples: Stationery, classroom supplies, minor repairs, routine consumables

B. Medium Value Purchases (₹20,000 – ₹200,000)

- At least three quotations should be obtained wherever feasible.
- Quotations may be collected through email, written proposals, or online platforms.
- Selection should consider quality, price, service, warranty, and delivery timelines.
- Reasons for vendor selection should be documented.

Note: - In case two/three quotations are not possible due to any reason, a strong justification note has to be added and documented for the same - **to be approved by the Director.**

- With availability of quotes, the justification for final selection needs to be provided, by way of submitting a note **to be approved by the Director.**

C. High Value Purchases (Above ₹200,000)

- A minimum of three competitive quotations shall normally be obtained.
- Comparative analysis shall be documented.
- Approval shall be obtained from the appropriate authority before finalizing the purchase.
- Additional due diligence may be conducted where necessary.

Note: - A detailed Note on why a specific vendor has been selected needs to be provided by way of submitting a note **to be approved by the Director.**

Examples: IT infrastructure, therapy equipment, furniture, vehicle purchases, large-scale printing contracts, infrastructure improvements.

5.3. Vendor Selection Criteria

Vendor selection shall be based on:

- Quality of goods or services.
- Cost competitiveness.
- Reliability and reputation.
- Delivery capability.
- Warranty and after-sales service.
- Compliance with legal requirements.
- Previous performance with the organization.

The lowest quotation need not automatically be selected if another vendor offers superior quality, service, or overall value.

5.4.Sole source procurement

In exceptional circumstances, procurement from a single vendor may be permitted where:

- Only one qualified supplier exists.
- Standardization or compatibility requirements exist.
- Emergency situations require immediate action.
- Donor requirements specify a particular vendor.
- Specialized expertise is required.

Such procurements must be documented and approved by the Director.

5.5.Emergency procurement

Emergency purchases may be undertaken when:

- Delays may compromise programme implementation.
- Health, safety, or safeguarding concerns exist.
- Equipment failure disrupts essential operations.

Emergency procurement should be reported and documented as soon as practicable, with a clear justification for the spend, especially for high value purchases.

5.6.Conflict of interest

- Personnel involved in procurement shall disclose any actual, perceived, or potential conflict of interest.
- No team member, Board member, consultant, or family member shall improperly benefit from procurement decisions.
- Individuals with a conflict of interest shall recuse themselves from the procurement process.

Examples include:

- Procurement from a family member's business.
- Awarding contracts to organizations in which the employee has a financial interest.
- Accepting personal benefits from vendors.

5.7.Gifts, hospitality and undue influence

Team members shall not:

- Accept gifts, commissions, kickbacks, or personal incentives from vendors.
- Allow procurement decisions to be influenced by personal relationships.
- Engage in practices that compromise fairness or integrity.

Modest promotional items of nominal value may be accepted where appropriate and lawful.

5.8.Purchase orders and documentation

All purchases should be supported by:

- Approved purchase requests.
- Quotations (where applicable).
- Comparative statements.
- Purchase orders or written confirmations.
- Delivery receipts.

- Invoices and payment records.

Proper documentation shall be maintained for audit and compliance purposes.

5.9. Receipt and verification of goods

The receiving team member (s) shall:

- Verify quantity and quality.
- Check for damage or defects.
- Confirm compliance with specifications.
- Record receipt of goods or services.

Any discrepancies should be reported immediately.

5.10. Payment procedures

Payments shall only be processed after:

- Receipt and verification of goods or services.
- Submission of valid invoices.
- Confirmation of approval requirements.
- Compliance with financial procedures.

The Finance Department shall maintain records of all procurement-related transactions.

5.11. Asset registration

Capital Assets to be Recorded in the Asset Register	Information to be Maintained in the Asset Register
Computers	Asset Description
Laptops	Date of Purchase
Projectors	Cost
Furniture	Location
Therapy Equipment	Custodian/Person Responsible
Vehicles	Asset Identification Number
Vocational Equipment	Warranty Details (where applicable)
Other Organizational Assets as designated by the organization	Status/Condition of Asset (where applicable)

Capital purchases such as computers, laptops, projectors, furniture, therapy equipment, vehicles, vocational equipment, and other significant organizational assets shall be recorded in the Asset Register maintained by the organization. The Asset Register shall contain, at a minimum, the asset description, date of purchase, cost, location, custodian, and asset identification number. Additional details such as warranty information, condition, and disposal records may also be maintained where relevant.

5.12. Procurement of consultancy services

Selection of consultants shall consider: Relevant qualifications, experience, technical expertise, references, cost effectiveness.

Terms of Reference (ToR), deliverables, timelines, and payment schedules should be documented through written agreements.

5.13. Donor-funded procurement

Where donor-funded projects prescribe specific procurement requirements, those requirements shall be followed in addition to this policy.

In case of conflict, the stricter requirement shall apply.

5.14. Monitoring and audit

Procurement records shall be subject to periodic review, internal checks, first by internal audit by the specific department and then subject to external audits annually.

The organization reserves the right to investigate any procurement activity that appears irregular or inconsistent with this policy.

5.15. Policy violations

Violations of this policy may result in:

- Corrective action
- Disciplinary proceedings
- Recovery of financial losses
- Termination of employment or engagement
- Reporting to relevant authorities where necessary

Fraudulent procurement practices shall be treated as serious misconduct.

Review of policy

This policy shall be reviewed periodically to ensure continued effectiveness, compliance with applicable regulations, and alignment with organizational growth and donor expectations.

Prabhat Education Foundation is committed to ensuring that all procurement decisions are guided by transparency, integrity, accountability, and prudent stewardship of resources in service of its mission and beneficiaries.

6. Volume: Administrative, governance and organizational Policies

6.1.Travel and local conveyance policy

Applicability

Applicable to all Prabhat members - employees, consultants, interns, fellows, volunteers, and Board members undertaking authorized travel on behalf of Prabhat.

Travel Authorization

- All official travel must be approved by the reporting supervisor or Director prior to travel.
- Travel should be planned in advance wherever possible.
- Programme-related travel should align with approved project activities and budgets.

Mode of travel

Prabhat encourages the use of safe, economical, and environmentally responsible modes of transportation.

Depending on the nature and distance of travel, approved modes may include:

- Public transport
- Auto-rickshaw
- Taxi or app-based cab services
- Bus travel
- Train travel
- Air travel (with prior approval)
- Personal vehicle (where approved)

Travel reimbursement

Reimbursement shall be made against:

- Original bills and receipts wherever available.
- Approved travel claims.
- Travel undertaken for official purposes only.

Accommodation

Where overnight travel is necessary:

- Accommodation shall be safe, reasonably priced, and appropriate.
- Special consideration shall be provided where accessibility requirements exist for employees or beneficiaries with disabilities.

Travel with beneficiaries

When travelling with children or persons with disabilities:

- Child Protection and Disability Safeguarding Policies shall apply.
- Appropriate supervision and permissions must be ensured.

- Emergency contact information should be available.

6.2. Administrative management policy

Office administration

The Administration team shall be responsible for:

- Office maintenance and upkeep.
- Inventory management.
- Asset tracking.
- Utilities and facility management.
- Vendor coordination.
- Administrative records.

Use of organizational facilities

Employees shall:

- Maintain cleanliness and care of organizational premises.
- Use resources responsibly.
- Report damage or maintenance concerns promptly.
- Respect shared workspaces and common facilities.

6.3. Asset management policy

Section	Policy Requirements
6.3.1 Asset Register	All organizational assets shall be recorded in an Asset Register maintained by the organization. Assets include, but are not limited to: • Computers and laptops • Projectors • Furniture • Therapy equipment • Assistive devices • Vehicles • Mobile phones • Machinery and specialized equipment
6.3.2 Asset Custody	Employees entrusted with organizational assets shall: • Use organizational assets responsibly and only for authorized purposes. • Protect assets from loss, theft, misuse, or damage. • Promptly report any loss, damage, malfunction, or theft. • Return all assigned assets upon transfer, resignation, termination, or completion of engagement with the organization.
6.3.3 Disposal of Assets	Organizational assets may be disposed of only after: • Approval by the authorized management representative. • Proper documentation and recording of the reasons for disposal. • Compliance with applicable financial, procurement, and audit procedures. • Updating the Asset Register to reflect the disposal of the asset.

Note: The Administration and Finance Team shall be responsible for maintaining and periodically verifying the Asset Register to ensure that all organizational assets are properly accounted for and safeguarded.

6.4. Governance policy

6.4.1. Governing Board

The Governing Board shall:

- Provide strategic direction.
- Ensure legal and statutory compliance.
- Approve major organizational policies.
- Review financial performance.
- Oversee organizational accountability.

6.4.2. Responsibilities of the Board

The Board shall:

- Act in the best interests of the organization.
- Avoid conflicts of interest.
- Maintain confidentiality.
- Promote transparency and ethical governance.
- Support sustainability and organizational growth.

6.4.3. Board meetings

- Meetings shall be held periodically as required by law and organizational needs.
- Minutes shall be documented and retained.
- Important decisions shall be formally recorded.

6.5. Delegation of authority policy

Prabhat shall maintain a clear delegation of authority structure to ensure accountability and operational efficiency.

The authority matrix shall define approval responsibilities for:

- Recruitment
- Procurement
- Financial expenditures
- Contracts and agreements
- Travel approvals
- Asset disposal
- Project approvals

No person shall approve transactions that directly benefit themselves.

6.6. Risk management policy

Prabhat recognizes that effective risk management is essential for protecting beneficiaries, staff, assets, reputation, and organizational sustainability.

Risk category	Types of risks that may occur, but not limited to
Safeguarding Risks	• Child protection concerns • Abuse, neglect, or exploitation • Disability safeguarding issues • Breaches of safeguarding policies

Risk category	Types of risks that may occur, but not limited to
Financial Risks	• Fraud • Misappropriation of funds • Funding shortfalls • Budget overruns • Donor compliance issues
Operational Risks	• Staff turnover • Programme disruptions • Infrastructure failures • Equipment breakdowns • Delays in project implementation
Reputational Risks	• Negative publicity • Policy violations • Ethical misconduct • Safeguarding incidents • Stakeholder complaints
Cybersecurity Risks	• Data breaches • System failures • Cyberattacks • Unauthorized access to information • Loss of digital data
Legal and Compliance Risks	• Regulatory non-compliance • Contractual disputes • Labour law violations • non-compliance with safeguarding laws • Tax and statutory compliance issues

6.7.Fraud, corruption and anti-bribery policy

Prabhat adopts a zero-tolerance approach towards fraud, corruption, bribery, embezzlement, and financial misconduct.

Team members shall not:

- Offer or accept bribes.
- Falsify records.
- Misuse organizational funds.
- Engage in fraudulent practices.

Suspected fraud must be reported immediately. Violations may result in disciplinary and legal action.

6.8.Whistleblower protection policy

Prabhat encourages employees and stakeholders to report concerns regarding:

- Fraud
- Corruption
- Abuse
- Safeguarding violations
- Policy breaches
- Unethical conduct

Reports made in good faith shall be treated confidentially. No individual shall face retaliation for reporting concerns honestly and responsibly.

6.9.Data and record retention policy

Prabhat shall maintain records in accordance with legal, donor, financial, safeguarding, and operational requirements.

Records shall be: Accurate, secure, accessible to authorized personnel only, retained for prescribed periods, properly disposed of when no longer required, special care shall be taken with: Child records, therapy records, disability assessments, financial records, personnel files

6.10. Environmental responsibility policy

Prabhat is committed to environmentally responsible practices.

The organization shall encourage:

- Reduction of paper usage.
- Responsible waste disposal.
- Energy conservation.
- Reuse and recycling of materials.
- Environmentally conscious procurement where feasible.

6.11. Partnership and collaboration policy

Partnerships shall be guided by:

- Shared values.
- Ethical standards.
- Mutual respect.
- Transparency.
- Compliance with safeguarding requirements.

All formal partnerships should be supported by written agreements outlining roles, responsibilities, and expectations.

6.12. Media and public representation policy

Only authorized individuals may issue official statements on behalf of Prabhat.

Personnel shall:

- Protect the reputation of the organization.
- Respect confidentiality.
- Follow media and communication guidelines.
- Ensure that all public communications uphold the dignity of beneficiaries.

6.13. Policy review and continuous improvement

All organizational policies shall be reviewed periodically to ensure:

- Legal compliance.
- Alignment with organizational growth.
- Incorporation of best practices.
- Continued relevance and effectiveness.

Suggestions from employees, beneficiaries, families, and stakeholders may be considered during policy reviews.

6.14. Prabhat Organogram

