

iGrow Success Masters Academy

Code of Conduct & Professional Ethics Manual

PUBLIC EDITION

Career Guidance | Career Coaching | Psychometric Assessments | Student & Graduate Career Development

"Every individual deserves ethical, respectful, inclusive, evidence-informed, and empowering career guidance that recognises their unique aspirations, strengths, circumstances, and potential."

VERSION	EFFECTIVE DATE	NEXT REVIEW
2.0 Public Edition	19 November 2026	November 2027

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Document Control

Item	Detail
Title	iGrow Success Masters Academy — Code of Conduct & Professional Ethics Manual
Version	2.0 (supersedes the Code of Conduct for Career Guidance and Coaching, version 1.0)
Effective date	19 November 2026
Owner and approver	Dinesh Kumar J, Founder & Chief Growth Mentor
Applies to	Everyone listed in Section 1.2
Review cycle	Annually each November, and whenever a relevant law, rule, court direction or professional code changes
Next scheduled review	November 2027
Status	Public edition. Adopted as the Academy's operating standard.
Classification	Public. May be shared with learners, parents, partners and the public.
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Revision history

Version	Date	Summary of changes
1.0	Before November 2026	Code of Conduct for Career Guidance and Coaching: introduction and Sections A–I.
2.0	19 November 2026	Expanded into a full Manual. All nine original sections retained and strengthened; added purpose and scope, core values, legal and standards framework, service-specific standards, child protection, wellbeing and crisis response, inclusion and accessibility, partnerships, roles, compliance and sanctions, safeguarding the Academy, and appendices.

Contents

A Message from Our Founder 4

Our Ten Commitments at a Glance 5

Part I — Foundations 6

1. Purpose, Scope and Application 6
2. Guiding Philosophy and Core Values 8
3. Legal and Professional Standards Framework 8
4. Service-Specific Standards 10

Part II — The Code of Conduct 12

Section A: The Professional Relationship 12
Section B: Confidentiality, Privileged Communication, Privacy and Data Protection 15
Section C: Professional Responsibility 18
Section D: Relationships with Other Professionals 19
Section E: Evaluation, Assessment and Interpretation 20
Section F: Online Services, Technology, Social Media and Artificial Intelligence 22
Section G: Supervision, Training and Teaching 23
Section H: Research and Publication 24
Section I: Resolving Ethical Issues 25

Part III — Safeguarding, Wellbeing and Inclusion 27

Section J: Child Protection and Student Safeguarding 27
Section K: Student Wellbeing, Mental Health and Crisis Response 29
Section L: Diversity, Equity, Inclusion and Accessibility 29
Section M: Institutional Partnerships, Workshops and Group Programmes 30

Part IV — Implementation and Governance 32

Section N: Roles and Responsibilities 32
Section O: Compliance, Monitoring, Breaches and Review 32
Section P: Safeguarding the Academy, Its People and Its Work 33

Appendices 37

Appendix 1: Informed Consent Checklist 37
Appendix 2: Safeguarding Concern — Step-by-Step 37
Appendix 3: Ethical Decision-Making Worksheet 38
Appendix 4: Glossary 38
Appendix 5: Sources and References 39
Appendix 6: Acknowledgement and Undertaking 40

A Message from Our Founder

Before I became a career coach, I spent eighteen years in the IT industry. In that time I met many capable people who were doing work that never quite fit them. When we talked, the story was often the same: at sixteen or seventeen, someone they trusted had told them which path was "safe", and they had followed it. Nobody had asked what they were good at, what they cared about, or what kind of life they wanted.

iGrow Success Masters Academy exists so that young people and working professionals get a better conversation than that. A good career conversation is honest about evidence and uncertainty. It respects the role of family without silencing the learner. It treats an assessment report as the start of a discussion, not a verdict. And it never forgets that the person in front of us is often a child, trusting us with their hopes, their worries and their data.

This Manual is how we keep that promise. It builds on our original Code of Conduct, keeping all nine of its sections and their commitments, and adds what a modern career guidance practice in India needs: clear data protection duties, child safeguarding, responsible use of technology and AI, fair psychometric practice, and a grievance process that learners and parents can trust.

I ask everyone who represents iGrow to read it, question it, and live it. If you ever find that a rule here does not serve a learner's real interests, tell me, and we will improve it together.

Dinesh Kumar J

Founder & Chief Growth Mentor, iGrow Success Masters Academy, Chennai

Our Ten Commitments at a Glance

Every person who represents iGrow Success Masters Academy makes these ten commitments. The rest of this Manual explains what each one requires in practice.

#	We commit to…	Where to read more
1	Put the learner's welfare and dignity above personal, financial or institutional interests.	Section A
2	Never guarantee admissions, ranks, jobs or salaries, and never use pressure or false urgency to sell a service.	Sections A, C
3	Obtain informed consent (and, for anyone under 18, a parent's or guardian's consent plus the learner's own agreement) before any service or assessment.	Sections A, B, E
4	Protect personal data as the Digital Personal Data Protection Act, 2023 requires, collecting only what we need and keeping it only as long as we need it.	Section B
5	Report any suspicion of sexual abuse of a child, as the POCSO Act, 2012 requires, and follow our safe-conduct rules with every minor.	Section J
6	Use assessments to open conversations, not to label people, and explain every report in a counsellor-led session.	Section E
7	Tell learners when AI is used, keep a human counsellor responsible for every recommendation, and verify every fact we give.	Section F
8	Work only within our competence and refer promptly, especially for mental-health concerns.	Sections C, D, K
9	Serve every learner fairly, whatever their region, language, religion, caste, gender, disability or income.	Section L
10	Raise concerns openly, resolve complaints quickly and fairly, and never retaliate against anyone who speaks up.	Section I

Part I — Foundations

1. Purpose, Scope and Application

1.1 Purpose

This Manual sets out the ethical and professional standards that govern career guidance, career counselling, career coaching and psychometric assessment at iGrow Success Masters Academy ("the Academy"), Chennai. It is the Academy's ethical foundation: it protects learners and families, guides practitioners when situations are unclear, and shows partners and the public how the Academy works.

1.2 Who this Manual applies to

The Manual applies, according to each person's responsibilities, to:

- the Founder and all employees;
- career coaches, career counsellors and trainers, whether full-time, part-time or engaged per session;
- interns, trainees and volunteers;
- supervisors and senior trainers;
- contractors and freelancers, including content writers, designers and assessment developers;
- technology administrators who manage the website, assessment platforms, learner accounts, data stores and AI tools;
- institutional partners and their staff when they deliver or co-deliver Academy programmes; and
- any authorised representative who speaks for or promotes the Academy.

In this Manual, "practitioner" means anyone who delivers guidance, counselling, coaching, training or assessment. "Learner" means any student, graduate or professional who receives a service, and includes the learner's parent or guardian where the context requires. "Minor" or "child" means a person under 18 years of age.

1.3 Services covered

The Manual covers every career-related service the Academy offers, in person in Chennai or online:

- **Class 8–9:** stream and subject selection, aptitude exploration, interests, personality, learning preferences and parental guidance, including the Stream Assessment.

- **Class 10–12:** career exploration, psychometric assessment (the Career Assessment), educational pathways, entrance examinations, course and college selection, and personalised career roadmaps.
- **College students and graduates:** career direction, skill-gap identification, higher education, job readiness, professional development and career transition, including the Graduate Career Assessment.
- **Working professionals:** career advancement, career change, leadership, professional skills and lifelong learning.
- **Delivery formats:** one-to-one sessions, parent–student sessions, group coaching, workshops, school and college partnerships, online counselling, digital assessments, the Career Library and Career Roadmap Planner, and AI-supported services such as the Academy's website assistant.

1.4 How to read this Manual

Each clause carries one or more labels so that readers can see where an obligation comes from. This matters: a legal duty cannot be waived by the Academy, while a good practice can be adapted with a recorded reason.

Label	Meaning
LAW	A binding requirement of Indian law, a rule made under it, or a binding court direction.
STANDARD	A voluntary professional or governance standard, such as the NCDA, ICF or IAEVG codes, testing standards or national AI guidance. The Academy adopts it voluntarily.
GOOD PRACTICE	A recommended practice in the field that is not legally required.
ACADEMY	A specific commitment the Academy has chosen to make. It binds everyone covered by this Manual.

Where a clause is based on Indian law, the Manual summarises the obligation in plain language. The summary is not legal advice and does not replace the text of the law.

1.5 Relationship to law and to other policies

1.5.1 LAW ACADEMY Where Indian law sets a higher or different standard than this Manual, the law prevails. Where this Manual sets a higher standard than the law, practitioners follow the Manual.

1.5.2 ACADEMY When a practitioner works inside a partner school, college or company, they also follow that institution's child protection, safety and conduct policies. If the two conflict, the practitioner follows the stricter rule and informs the Founder.

1.5.3 ACADEMY Nothing in this Manual claims or implies any government approval, accreditation, licence or affiliation that the Academy does not hold. The Academy's

MSME (Udyam) registration, UDYAM-TN-02-0505477, is a business registration and is never described as an accreditation of counselling quality.

2. Guiding Philosophy and Core Values

"Every individual deserves ethical, respectful, inclusive, evidence-informed, and empowering career guidance that recognises their unique aspirations, strengths, circumstances, and potential."

Our values draw on the professional principles shared by the National Career Development Association (NCDA), the International Coaching Federation (ICF) and the International Association for Educational and Vocational Guidance (IAEVG): autonomy, non-maleficence (do no harm), beneficence (do good), justice, fidelity and veracity. We express them in ten values that fit our context in India.

Value	What it means at iGrow
Dignity and respect	Every learner is treated as a whole person with their own story, never as a score, a lead or a sales target.
Learner autonomy	We inform and guide; the learner, with their family, decides. We never decide for them.
Integrity and honesty	We tell the truth about what we know, what we do not know, what our tools can and cannot do, and what our services cost.
Competence	We work within our training and verified expertise, keep learning, and refer when a need is beyond us.
Evidence-informed practice	Our advice rests on verified information about courses, exams and labour markets, and on assessments used within their known limits.
Confidentiality and privacy	Learner information is held in trust and protected as Indian law requires.
Safety and wellbeing	The safety of children and the wellbeing of every learner come before any other consideration.
Inclusion and social justice	We work actively to remove barriers related to region, language, religion, caste, gender, disability, income and first-generation status.
Family partnership	We respect the central role of families in Indian career decisions while protecting the learner's own voice.
Responsible technology	Technology and AI widen access and improve quality, under human oversight and with transparency.

3. Legal and Professional Standards Framework

The following instruments informed this Manual. Their status was checked against official or authoritative sources in November 2026. Laws and standards change; Section O explains how the Academy keeps this table current.

Instrument	Type	Relevance to the Academy
Digital Personal Data Protection Act, 2023 and DPDP Rules, 2025 (Rules notified 13 November 2025)	Binding law (phased)	Notice, consent, children's data, security, breach notification, retention and learner rights. Core obligations under Rules 3, 5–16, 22 and 23 apply from 13 May 2027. The Academy adopts them now.
Protection of Children from Sexual Offences Act, 2012 (POCSO)	Binding law	Section 19 duty on any person to report knowledge or apprehension of an offence; Section 21 penalties for failure to report.
Consumer Protection Act, 2019 and CCPA Guidelines for Prevention of Misleading Advertisements and Endorsements, 2022	Binding law	Fair fees, refunds, honest advertising, testimonials and endorsements.
CCPA Guidelines for Prevention of Misleading Advertisement in Coaching Sector, 2024 (in force 13 November 2024)	Binding on the coaching sector	Prohibits false claims such as guaranteed selection or jobs. The Academy follows it voluntarily.
Ministry of Education Guidelines for Registration and Regulation of Coaching Centres, 2024	Advisory to States; State rules may bind	Model standards on misleading promises, counselling support and student welfare. The Ministry's definition of coaching excludes counselling.
Supreme Court of India, Sukdeb Saha v. State of Andhra Pradesh, 2025 INSC 893 (25 July 2025)	Binding judicial guidelines	15 guidelines on student mental health and suicide prevention for educational institutions, including coaching institutes and training centres.
Rehabilitation Council of India Act, 1992	Binding law	Practising as a clinical psychologist or other rehabilitation professional requires RCI registration.
Rights of Persons with Disabilities Act, 2016	Binding law	Non-discrimination, reasonable accommodation and accessibility.
Transgender Persons (Protection of Rights) Act, 2019	Binding law	Non-discrimination in education and services.
Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Binding law	Workplace conduct, Internal Committee where 10 or more employees.
Information Technology Act, 2000 and CERT-In Directions of 28 April 2022	Binding law	Cybersecurity practices and reporting of specified cyber incidents.
NCDA Code of Ethics (2024, with AI additions)	Voluntary standard	Career development ethics; the structure of Sections A–I follows the NCDA Code.
ICF Code of Ethics (in force 1 April 2025)	Voluntary standard	Coaching ethics, agreements, role clarity and AI disclosure.
IAEVG Ethical Guidelines (approved 14 October 2025)	Voluntary standard	International guidance ethics, social justice, digital technology and AI.

Instrument	Type	Relevance to the Academy
Standards for Educational and Psychological Testing (AERA, APA, NCME, 2014); ITC Guidelines on Test Use; ISO 10667	Voluntary standards	Validity, reliability, fairness, test use and assessment service delivery.
India AI Governance Guidelines (MeitY, 5 November 2025)	Voluntary national guidance	Seven guiding principles ("sutras") for safe and trusted AI.
National Education Policy, 2020	Policy (not binding on private providers)	Emphasis on flexible pathways, vocational exposure and career counselling.

> **A note on titles**
>
> In India, "career counsellor" and "career coach" are not regulated titles, and the Academy is not a mental-health service. Practitioners describe their qualifications accurately, name the body that issued any credential, and never use the protected title "Clinical Psychologist" unless registered with the Rehabilitation Council of India.

4. Service-Specific Standards

The same ethics apply to every learner, but their practical meaning changes with age and life stage. The table below summarises the extra care each group needs. Detailed rules appear in Part II.

Learner group	Main ethical risks	Required safeguards
Class 8–9 (typically 13–15 years)	Parental pressure; early labelling; children's data; online safety.	Parent or guardian consent plus the learner's own agreement; counsellor-led report; parents encouraged to attend the feedback session; streams presented as choices with reversible options; full safeguarding rules (Section J).
Class 10–12 (typically 15–18 years)	Exam stress; misinformation about entrance exams and cut-offs; single-path thinking.	All eligibility, exam and fee information verified against official sources and dated; every roadmap includes target and back-up options; wellbeing check and referral pathway (Section K).
College students and graduates	Job-market anxiety; unrealistic placement expectations; financial pressure.	No job or salary guarantees; transparent fees; skill-gap advice based on current evidence; respect for adult autonomy and confidentiality from family unless the learner consents.

Learner group	Main ethical risks	Required safeguards
Working professionals	Conflicts with employers; confidentiality; career-change risk.	Clear agreement on who the client is when an employer pays; no sharing with the employer without the professional's written consent; balanced discussion of risks.
Workshops, schools and colleges	Sales pressure on minors; group confidentiality; institutional data sharing.	Written agreement with the institution; no selling to minors in sessions; only aggregated reports to institutions (Section M).
Online and AI-supported services	Data security; identity; reduced visibility of distress; AI errors.	Secure platforms; disclosure of AI use; human review of every recommendation; crisis escalation (Sections F and K).

Part II — The Code of Conduct

Part II preserves the nine sections (A–I) of the Academy's original Code of Conduct. Each section keeps its original commitments and adds the detail needed to apply them consistently.

Section A: The Professional Relationship

> *The foundation of effective career guidance is trust. Every practitioner places the learner's welfare above personal, financial or institutional interests.*

A.1 Learner welfare and dignity

A.1.1 STANDARD ACADEMY The primary duty is to promote the welfare and dignity of every learner. Practitioners practise cultural competence and serve people of every region, language, religion, caste, gender, ability and socioeconomic background with equal care.

A.1.2 STANDARD ACADEMY Practitioners respect the learner's autonomy. They provide information, evidence and options; the final decision belongs to the learner, and for a minor, to the learner together with their parent or guardian.

A.1.3 ACADEMY No practitioner promises or implies a guaranteed admission, rank, score, job, placement or salary.

A.2 Scope of service

A.2.1 STANDARD ACADEMY Practitioners distinguish clearly between career information (facts about courses, exams and occupations), career guidance and counselling (structured exploration and decision support) and career coaching (goal-focused, learner-led development). The service agreement states which is being provided.

A.2.2 ACADEMY Services are provided only within the practitioner's verified competence. When a learner's needs exceed that competence, the practitioner refers them (Section D).

A.2.3 LAW ACADEMY Career guidance is not mental-health treatment. Practitioners do not diagnose or treat mental-health conditions or learning disabilities. Only a person registered with the Rehabilitation Council of India may present themselves as a clinical psychologist, and no practitioner uses the titles "psychologist" or "therapist" unless they hold the relevant qualification and registration.

A.3 Informed consent

A.3.1 STANDARD ACADEMY Informed consent is obtained at the start of every engagement and reviewed whenever the service, its cost or its methods change. It covers the goals, methods and assessments to be used, the limits of confidentiality, fees and refunds,

how personal data will be used and kept, any recording, any use of AI, and the learner's right to refuse or withdraw. The full checklist is in Appendix 1.

A.3.2 LAW ACADEMY For any learner under 18, the Academy obtains the consent of a parent or lawful guardian and also seeks the young person's own agreement (assent) in age-appropriate language. Under the DPDP Rules, 2025 this consent must be verifiable before a child's personal data is processed; the Academy applies this standard now, ahead of its commencement on 13 May 2027.

A.3.3 ACADEMY Consent is explained in plain language that the learner and family understand. If the practitioner cannot communicate in that language, the Academy arranges bilingual material or, with consent, an interpreter.

A.3.4 STANDARD ACADEMY Learners may refuse or withdraw from any service at any time. Withdrawal never leads to any penalty other than those already stated in the published refund policy.

A.4 Fees, payments and financial transparency

A.4.1 LAW ACADEMY Fees, what they include, payment terms and the refund policy are given in writing before any payment is taken. Hidden charges, pressure selling and false urgency (for example, "only two seats left" when that is not true) are unfair trade practices and are prohibited.

A.4.2 STANDARD ACADEMY In alignment with NCDA ethical standards, learners are informed in the initial informed consent documentation if the Academy reserves the right to use legal action or collection agencies for unresolved balances, and are given a timely opportunity to pay. The Academy first resolves any unpaid balance through a conversation and a written reminder, and takes no further step until at least 30 days after that reminder.

A.4.3 ACADEMY Fees are fair, transparent and considerate of learners' financial circumstances. Requests for a concession on grounds of hardship are considered by the Founder and decided on consistent criteria.

A.4.4 STANDARD ACADEMY Bartering (accepting goods or services instead of fees) is used only when it is non-exploitative, requested by the learner, and documented in writing.

A.5 Professional boundaries

A.5.1 STANDARD ACADEMY Romantic or sexual relationships with current or former learners, their partners or their family members are prohibited. With any learner who is a minor, any sexual or romantic conduct is absolutely prohibited and may be a criminal offence under the POCSO Act, 2012.

A.5.2 ACADEMY Practitioners avoid dual relationships (for example, counselling a relative, a close friend's child or a business associate). Where one cannot be avoided, it is

disclosed to the Founder, recorded, and managed, or the learner is referred to another practitioner.

A.5.3 ACADEMY Practitioners have no personal financial dealings with learners or their families: no loans, investments, or selling of products or services unrelated to the Academy.

A.5.4 ACADEMY Token gifts of small value may be accepted openly at the end of an engagement and are reported to the Founder. Cash, gift vouchers and gifts from minors are declined politely.

A.5.5 ACADEMY Communication with learners and families takes place through the Academy's official channels: the Academy email (igrow@successmastersacademy.in), the Academy WhatsApp and phone number (+91 99949 42763), and approved session platforms. Practitioners do not share personal phone numbers or social media accounts with minors.

A.6 Family and support networks

A.6.1 STANDARD ACADEMY Support networks such as parents, guardians, siblings and mentors may be involved with the learner's consent, recognising the important role of family in Indian career decisions. Parents are encouraged to attend the feedback session that follows an assessment.

A.6.2 ACADEMY When a learner and their family disagree, the practitioner presents evidence fairly, helps each side hear the other, and protects the learner's voice. The practitioner does not take sides on grounds of prestige, tradition or personal opinion.

A.6.3 ACADEMY For learners aged 18 and over, family members are involved only with the learner's express consent.

A.7 Advocacy and non-imposition of values

A.7.1 STANDARD ACADEMY Advocacy is undertaken, when appropriate, to remove barriers that limit learners' access to opportunities. Practitioners tell learners about scholarships, fee waivers, reservation and quota provisions they may be eligible for, and free public resources such as the National Career Service portal.

A.7.2 STANDARD ACADEMY Practitioners do not impose their personal values, beliefs or preferences, including assumptions about "prestigious" careers or about which subjects suit a particular gender.

A.8 Ending and transferring services

A.8.1 STANDARD Services end when the learner's goals are met, when the learner no longer benefits, or when the learner chooses to stop. Practitioners do not abandon a learner mid-engagement; they arrange a proper close or referral.

A.8.2 ACADEMY If a practitioner leaves the Academy or becomes unavailable, the Academy arranges continuity of service with the learner's consent and hands over records securely.

Section B: Confidentiality, Privileged Communication, Privacy and Data Protection

> *Trust is the cornerstone of our mentorship model. Practitioners maintain a safe environment by rigorously safeguarding all information gathered during professional interactions.*

B.1 The legal framework

B.1.1 LAW When the Academy decides why and how learners' personal data is processed, it is a "Data Fiduciary" under the Digital Personal Data Protection Act, 2023. The DPDP Rules, 2025 were notified on 13 November 2025 and come into force in phases; the obligations on notice, consent, security, breach notification, children's data and retention apply from 13 May 2027.

B.1.2 ACADEMY The Academy applies these obligations now, because they reflect good practice and because learners are entitled to them. The Academy monitors official notifications for any change to the commencement dates.

B.2 Notice and consent

B.2.1 LAW ACADEMY Before collecting personal data, the Academy gives a clear, stand-alone notice listing the data collected, the specific purposes, how consent can be withdrawn, how to exercise rights, and how to complain to the Data Protection Board of India. The notice is written in plain language.

B.2.2 LAW ACADEMY Consent is free, specific, informed, unconditional and unambiguous, and withdrawing it is as easy as giving it. Marketing communications require separate consent.

B.3 Children's data

B.3.1 LAW The Academy obtains verifiable consent from a parent or lawful guardian before processing the personal data of anyone under 18, and from a lawful guardian for a person with a disability who has one.

B.3.2 LAW The Academy does not track or behaviourally monitor children, does not direct targeted advertising at them, and does not process their data in any way likely to harm their wellbeing.

B.3.3 ACADEMY A minor creates an account or takes an assessment only after the parent or guardian has booked the service and given consent. Assessment results for minors are released only through a counsellor-led session.

B.4 Purpose limitation, minimisation and accuracy

B.4.1 LAW ACADEMY Only data needed for the stated purpose is collected. Assessment responses are used for guidance and, in de-identified form, to improve the assessments. They are never used for marketing, sold or shared for any commercial purpose.

B.4.2 LAW ACADEMY The Academy keeps personal data accurate and corrects it promptly when a learner points out an error.

B.5 Security safeguards

B.5.1 LAW ACADEMY Reasonable security safeguards protect personal data: role-based access, multi-factor authentication on the website, email and cloud accounts, encryption in transit, secure passwords, up-to-date software, regular backups and access logs. Access to learner records is limited to staff who need it for their role.

B.5.2 LAW ACADEMY Third parties that process data for the Academy (for example, website hosting, cloud storage and video-conferencing providers) are bound by contract or terms of service to protect it.

B.6 Retention and secure deletion

B.6.1 LAW ACADEMY Records are retained only as long as necessary and then securely destroyed. The Academy's retention periods are:

Record	Retention period
Assessment results, reports and assessment coupon records	12 months from the date the report is delivered
Session notes and career roadmaps	For the duration of the engagement and 12 months after the last session
Consent forms	For as long as the related data is held, and 12 months after
Safeguarding records	As advised by legal counsel, stored separately with restricted access
Invoices and payment records	For the period required by tax and accounting laws
De-identified research and validation data	As long as needed for the stated research purpose

B.6.2 LAW ACADEMY A learner may ask for earlier deletion at any time, unless a law requires the Academy to keep the record.

B.7 Learners' rights

B.7.1 LAW ACADEMY Learners (and parents of minors) may ask for a summary of their personal data and how it is used, its correction or erasure, and the redress of any grievance, and may nominate another person to exercise these rights on their behalf. Requests go to igrow@successmastersacademy.in. The Academy acknowledges each request within 2 working days and resolves it within 15 working days.

B.8 Personal data breaches

B.8.1 LAW ACADEMY If a personal data breach occurs, the Academy contains it, informs each affected learner without delay in plain language, and informs the Data Protection Board of India, providing a detailed report within 72 hours of becoming aware of it.

B.8.2 LAW Where a cyber incident falls within the CERT-In Directions of 28 April 2022, it is also reported to CERT-In within the prescribed time (six hours of noticing it).

B.9 Limits of confidentiality

B.9.1 STANDARD ACADEMY The limits of confidentiality are explained at the outset. Confidentiality may be broken only where there is a serious and imminent risk of harm to the learner or others, a suspicion of abuse of a child or vulnerable adult, a legal duty to report (such as under the POCSO Act), or a court order or other legal mandate.

B.9.2 STANDARD ACADEMY Information is shared only with the learner's informed consent or when legally required, and then only the minimum necessary details are disclosed. The disclosure, its reason and its recipient are recorded.

B.10 Group, family and minor sessions

B.10.1 STANDARD ACADEMY In group or family sessions, roles and confidentiality boundaries are clarified in writing at the beginning, including the fact that the Academy cannot guarantee that other participants will keep information confidential.

B.10.2 STANDARD ACADEMY For minors or learners unable to give full consent, parents or guardians are engaged appropriately while the young person's voice and privacy are safeguarded to the greatest extent possible. Before a session, the young person is told what will be shared with their parents and what will not.

B.11 Sharing with institutions and recording

B.11.1 ACADEMY Partner schools, colleges and employers receive only aggregated, de-identified information unless the individual learner (and, for a minor, their parent or guardian) has given written consent to share an individual report.

B.11.2 ACADEMY Sessions are recorded only with the explicit, prior consent of the learner and, for a minor, the parent or guardian. Recordings are stored securely and deleted on the same schedule as session notes.

> **Privacy and grievance contact**
>
> Dinesh Kumar J, Founder & Chief Growth Mentor. Email: igrow@successmastersacademy.in. Phone and WhatsApp: +91 99949 42763. This contact is displayed on the Academy website and in every privacy notice.

Section C: Professional Responsibility

> *Practitioners practise only within the boundaries of their validated education, training and certified expertise, and maintain high standards of competence, integrity and accountability.*

C.1 Competence and continuing development

C.1.1 STANDARD ACADEMY Continuous professional development is pursued through training, supervision and study, including Indian labour markets, emerging careers, entrance examinations, technology and ethics. Each practitioner completes at least 20 hours of professional development a year, of which at least 3 hours cover ethics, safeguarding or data protection.

C.1.2 ACADEMY Practitioners take on new types of service (for example, overseas admissions or a new assessment) only after appropriate training and supervised practice.

C.2 Accuracy of career information

C.2.1 ACADEMY Information about eligibility, entrance examinations, cut-offs, fees, scholarships and admission dates is verified against official sources (such as the examining body, university or regulator) for the current cycle before it is given to a learner. Written material shows the date it was checked and its source.

C.2.2 ACADEMY When a practitioner discovers an error in information already given, they correct it promptly in writing and tell the learner what has changed.

C.3 Honest representation of qualifications and the Academy

C.3.1 LAW STANDARD ACADEMY Services are advertised honestly. Qualifications, success rates and limitations are represented accurately, without exaggeration. Every credential is stated with the name of the body that issued it.

C.3.2 ACADEMY No one claims or implies an accreditation, government approval, university affiliation or partnership that the Academy does not hold.

C.4 Advertising, testimonials and endorsements

C.4.1 LAW Advertisements, social media posts, brochures and website content must not be misleading. This applies under the Consumer Protection Act, 2019 and the CCPA Guidelines for Prevention of Misleading Advertisements and Endorsements, 2022.

C.4.2 GOOD PRACTICE ACADEMY The Academy voluntarily follows the CCPA Guidelines for Prevention of Misleading Advertisement in Coaching Sector, 2024: no claims of guaranteed selection, rank or job; no success figures without evidence; and no use of a learner's name, photograph or result without written consent given after the result is known (from the parent or guardian for a minor).

C.4.3 LAW ACADEMY Paid or incentivised endorsements are clearly disclosed. Testimonials are genuine, unedited in meaning, and published only with written consent.

C.5 Conflicts of interest

C.5.1 STANDARD ACADEMY Conflicts of interest are avoided or disclosed immediately. Any financial, referral or promotional arrangement with a college, university, training provider or employer is disclosed in writing to the learner before a recommendation involving that institution is made. Recommendations never depend on such arrangements.

C.5.2 STANDARD ACADEMY Self-referrals to a practitioner's private practice are not made unless Academy policy explicitly permits it and the learner is offered alternatives.

C.6 Wellbeing and fitness to practise

C.6.1 STANDARD ACADEMY Self-care is practised to prevent burnout and ensure consistent quality of service. A practitioner whose health, stress or personal circumstances may affect their judgement steps back from client work and informs the Founder, who arranges cover.

C.7 Workplace conduct

C.7.1 LAW ACADEMY The Academy provides a workplace free from harassment and discrimination. Sexual harassment complaints are handled under the POSH Act, 2013: through an Internal Committee once the Academy has 10 or more employees, and through the Local Committee constituted by the District Officer until then.

C.7.2 ACADEMY The Academy's reputation is protected by acting with honesty in all professional dealings. Practitioners do not make disparaging remarks about colleagues, other practitioners or other organisations.

Section D: Relationships with Other Professionals

> *We recognise that career development often intersects with other disciplines, and that learners are best served when professionals work together with respect.*

D.1 STANDARD ACADEMY Referrals to other coaches, counsellors or specialists are made when a learner's needs exceed the Academy's scope, with the learner's consent and a proper handover. The Academy maintains a referral list of verified professionals, including RCI-registered clinical psychologists, psychiatrists, special educators and educational consultants, and reviews it every year.

D.2 ACADEMY Signs of significant emotional distress, a possible learning difficulty or a mental-health concern lead to a referral, not to career advice alone. Section K sets out the crisis procedure.

D.3 STANDARD ACADEMY Practitioners approach colleagues, other professional groups and external educators with respect and professional courtesy.

D.4 STANDARD ACADEMY When a learner is already working with another professional, the practitioner seeks the learner's written permission before sharing information, so that support is coordinated.

D.5 ACADEMY The Academy does not pay or accept referral fees for referring a learner to another professional unless the arrangement is disclosed to the learner in writing beforehand.

D.6 STANDARD ACADEMY Joint programmes or partnerships with schools, colleges or organisations are conducted transparently and ethically, as set out in Section M.

Section E: Evaluation, Assessment and Interpretation

> *Psychometric inventories, skill checklists and qualitative assessment instruments are supportive tools for building self-awareness. They are not definitive labels and never replace human judgement.*

E.1 Responsibility

E.1.1 STANDARD ACADEMY Practitioners take direct responsibility for the accurate administration, scoring and careful interpretation of all assessment data, whether the tool is delivered on paper, online or through a third-party platform.

E.1.2 ACADEMY Only practitioners trained in a particular instrument interpret its results. Trainees interpret results only under supervision.

E.2 Selecting instruments

E.2.1 STANDARD ACADEMY Only tools with documented evidence of validity and reliability for the learner's age group and context, and with norms relevant to Indian learners, are selected for decisions of consequence. Their purpose, limitations and possible biases are explained to learners in clear language.

E.2.2 STANDARD Selection, use and reporting follow the principles of the Standards for Educational and Psychological Testing (2014), the International Test Commission Guidelines on Test Use and ISO 10667 on assessment service delivery.

E.2.3 LAW ACADEMY Proprietary tests are used only under a valid licence. Test items, scoring keys and manuals are kept secure and are not copied or shared.

E.3 Academy-developed assessments

E.3.1 ACADEMY The Academy's own instruments (the Stream Assessment for Class 8–9, the Career Assessment for Class 10–12 and the Graduate Career Assessment) are documented in a technical file covering their purpose, constructs, item development, scoring, norm groups and known limitations.

E.3.2 ACADEMY Until a formal validation study for a particular instrument has been completed and documented, the Academy describes it as a structured self-discovery and guidance tool and does not call it "scientifically validated" or "standardised".

E.3.3 ACADEMY Items are reviewed for cultural, linguistic, gender and socioeconomic bias before release and after each pilot. Pilot participants are told that the tool is being piloted and that their results are provisional.

E.3.4 ACADEMY Validation data (reliability, item analysis and outcome tracking) is reviewed at least once a year, and the instruments are revised when the evidence calls for it.

E.4 Fairness and accessibility

E.4.1 LAW STANDARD ACADEMY Learners with a disability are offered reasonable accommodations, such as extra time, a screen-reader-compatible format, a reader or scribe, or breaks. Any accommodation is noted in the report, and results are interpreted accordingly.

E.4.2 STANDARD ACADEMY Results are interpreted with care for learners whose first language differs from the language of the test, and for learners with limited exposure to the kind of tasks the test uses.

E.5 Consent and administration

E.5.1 STANDARD ACADEMY Informed consent is obtained before any assessment. Learners are told what is being measured, how long it takes, who will see the results, how long they will be kept, and that they may stop at any time.

E.5.2 STANDARD ACADEMY Assessments are administered under consistent conditions. For online assessments, learners receive clear instructions and a quiet-environment checklist. The Academy does not use invasive remote proctoring.

E.6 Interpretation and reporting

E.6.1 STANDARD ACADEMY Results are interpreted in the learner's cultural, linguistic, educational and personal context, alongside interviews, school records and the learner's own goals.

E.6.2 ACADEMY All Academy assessments are counsellor-led: the report comes to the Academy first and is explained to the learner (and, for a minor, the parent or guardian) by a counsellor in a feedback session. Reports are not released without that session, except at the learner's specific request after an explanation of the risks.

E.6.3 STANDARD ACADEMY Reports are accurate, balanced, strengths-based and free from stereotyping. Raw scores and technical jargon are avoided with learners. Each report states that its results are indicative, not predictive, and includes target and back-up options.

E.6.4 STANDARD ACADEMY Assessments are never used to label or limit learners. The Academy does not provide individual results to schools, colleges or employers for admission, selection or rejection decisions.

E.6.5 ACADEMY Results for adolescents that are more than two years old are reviewed with the learner before being relied on, because interests and abilities change during adolescence.

Section F: Online Services, Technology, Social Media and Artificial Intelligence

> *Our services use digital infrastructure and AI tools. Practitioners stay competent in online delivery, and learner information is never handled carelessly on any platform.*

F.1 Online sessions

F.1.1 STANDARD ACADEMY Secure, encrypted platforms approved by the Academy are used for online sessions. Learners are told about technical limitations, data security measures and what happens if the connection drops.

F.1.2 STANDARD ACADEMY At the start of each online engagement the practitioner confirms the learner's identity, the city or town they are in, and an emergency contact, so that help can be arranged if a crisis arises.

F.1.3 ACADEMY Online sessions with minors are scheduled through the parent or guardian, who is informed of the session time and remains reachable during it.

F.1.4 STANDARD ACADEMY Technology is used to widen access for learners in remote or under-served areas. Phone-based or low-bandwidth alternatives are offered so that service quality does not depend on internet quality.

F.2 Social media and digital communication

F.2.1 STANDARD ACADEMY Professional boundaries are maintained in all digital communication. Personal social media accounts are kept separate from professional interactions. Practitioners do not send or accept personal friend or follow requests to or from learners, and never with minors.

F.2.2 STANDARD ACADEMY Learner testimonials or case examples shared publicly require explicit written consent and are anonymised unless the learner (or the parent of a minor) has specifically agreed to be named.

F.2.3 ACADEMY Learner information is never discussed in public posts, comments, community groups or messaging groups, even without names.

F.3 Responsible use of artificial intelligence

The NCDA Code of Ethics (2024), the ICF Code of Ethics (2025) and the IAEVG Ethical Guidelines (2025) now address AI, and the India AI Governance Guidelines (2025) set out voluntary principles for safe and trusted AI. The Academy applies them as follows.

F.3.1 STANDARD ACADEMY **Transparency.** Learners are told when AI is used in a service that affects them, including the website assistant, the drafting of reports or roadmaps, and

the summarising of session notes. AI-powered tools are always labelled as AI and never presented as a human.

F.3.2 STANDARD ACADEMY **Human responsibility.** No career recommendation, assessment interpretation or report is delivered to a learner on the basis of AI alone. A named counsellor reviews AI-assisted content and is accountable for it.

F.3.3 LAW ACADEMY **Data protection.** Identifiable learner information is entered only into AI tools the Academy has approved after checking their data-use terms, and is de-identified wherever possible. Personal data of minors is never entered into public AI tools.

F.3.4 ACADEMY **Accuracy.** AI-generated information about courses, exams, colleges, cut-offs or careers is verified against official sources before it is shared (clause C.2.1).

F.3.5 STANDARD ACADEMY **Fairness.** AI outputs are checked for bias related to gender, caste, region, language, disability or income. Learners can report a concern about an AI output through the grievance channel.

F.3.6 ACADEMY **Website assistant.** The Academy's AI assistant provides general information, offers a hand-over to a human counsellor, collects only the data it needs, and does not attempt crisis counselling. When a user expresses distress or risk, it shows emergency and helpline information and alerts the Academy.

F.3.7 ACADEMY **Register of AI tools.** The Founder keeps an internal register of approved AI tools, their purpose, the data they may receive and the date they were last reviewed.

F.4 Cybersecurity

F.4.1 LAW ACADEMY Everyone with access to Academy systems uses multi-factor authentication where available, a password manager or unique strong passwords, screen locks, and up-to-date devices. Learner data is never stored on personal devices without encryption and the Founder's approval.

F.4.2 ACADEMY Suspected phishing, account compromise, lost devices or accidental disclosures are reported to the Founder immediately, so that the breach procedure in clause B.8 can begin.

Section G: Supervision, Training and Teaching

> *Senior trainers and educators carefully oversee the work of junior coaches and interns. Supervision includes regular performance appraisals, constructive skill evaluations, and making sure that all trainees follow this Manual.*

G.1 STANDARD ACADEMY Supervisors maintain clear, objective boundaries and avoid dual relationships with supervisees.

G.2 STANDARD ACADEMY Feedback is constructive, timely and focused on professional growth. Supervisees' confidentiality is respected.

G.3 STANDARD ACADEMY Training programmes include ethics, cultural sensitivity, child safeguarding and the POCSO Act, data protection, responsible use of AI, mental-health first response, and practical application in Indian career contexts.

G.4 STANDARD ACADEMY Trainees are assessed fairly and supported to develop competence before independent practice. A trainee progresses from observation, to co-facilitation, to supervised independent sessions, and is signed off by a supervisor before working alone.

G.5 GOOD PRACTICE ACADEMY Before working with minors, every practitioner, intern and contractor completes identity and reference checks and signs the Acknowledgement and Undertaking in Appendix 6.

G.6 ACADEMY New team members read this Manual and complete induction training on it within 30 days of joining, and before any unsupervised contact with learners.

G.7 ACADEMY Learners are told when a trainee is involved in their service and may ask for a fully qualified practitioner instead.

Section H: Research and Publication

> *Any data collection, educational research or case study carried out under the Academy's name follows recognised scientific standards and Indian law. The physical, psychological and emotional welfare of participants is protected throughout the research cycle.*

H.1 STANDARD ACADEMY Informed consent is obtained from all participants, and the risks and benefits are explained clearly. For participants under 18, a parent's or guardian's consent and the young person's own assent are both required.

H.2 LAW STANDARD ACADEMY Data is anonymised, stored securely and used only for the stated purposes. Research use is described in the privacy notice.

H.3 ACADEMY Pilot studies of Academy assessments are identified as pilots, and participants receive the support of a counsellor-led session in the same way as other learners.

H.4 STANDARD ACADEMY Accurate reporting is mandatory. Authorship credit is given fairly, sources are cited, and plagiarism is strictly prohibited. Substantial use of AI in drafting a publication is disclosed.

H.5 ACADEMY Case studies used in blogs, workshops or marketing are either composites that cannot identify any person, or are used with written consent. Identifiable case studies of minors are never published.

H.6 STANDARD ACADEMY Findings that could benefit the Indian career guidance community are shared responsibly and with respect for participants' dignity.

Section I: Resolving Ethical Issues

> *Ethical challenges are addressed openly and constructively. Raising a concern in good faith is always the right thing to do.*

I.1 Reflection and consultation

I.1.1 STANDARD ACADEMY Practitioners regularly reflect on their practice and seek supervision or peer consultation when facing a dilemma, using de-identified details.

I.2 Ethical decision-making model

I.2.1 STANDARD ACADEMY When a situation is unclear, practitioners follow this structured process and record their reasoning. Appendix 3 contains a worksheet.

Step	Action
1. Identify	Describe the issue and who is affected. Is anyone at risk right now? If so, act on safety first (Sections J and K).
2. Apply	Check this Manual, the law and relevant professional codes. Is there a legal duty that decides the matter?
3. Consider	Weigh the core values: autonomy, doing no harm, doing good, justice, fidelity and honesty.
4. Consult	Speak to a supervisor or the Founder. Seek legal advice where a legal question is involved.
5. Generate	List the realistic options and the likely consequences of each for the learner and others.
6. Decide and act	Choose the option that best serves the learner within the law, and act on it.
7. Review	Record what happened and what was learned. Would you be comfortable explaining this decision to the learner, their family and a colleague?

I.3 Reporting concerns about colleagues

I.3.1 STANDARD ACADEMY Serious violations by colleagues are reported through internal channels or, where the law requires, to the relevant authority, while protecting the people involved. Where a minor may be at risk, Section J applies immediately.

I.3.2 ACADEMY No one who raises a concern in good faith suffers retaliation. Retaliation is itself a serious breach of this Manual.

I.4 Complaints and grievance procedure for learners and families

I.4.1 ACADEMY The Academy maintains an open-door policy for ethical concerns and commits to fair and timely resolution. Learners and families may raise a complaint by email to igrow@successmastersacademy.in, by phone or WhatsApp to +91 99949 42763, or in person.

Stage	What happens	Timeframe
Acknowledgement	The complaint is logged and acknowledged in writing, with the name of the person handling it.	Within 2 working days
Review	The facts are gathered from all parties, records are reviewed, and the complainant may provide more information.	Within 10 working days
Resolution	A written response explains the findings and any remedy (such as an apology, correction, re-session, refund under the refund policy, or disciplinary action).	Within 15 working days of receipt
Escalation	If the complaint is about a practitioner's conduct and the complainant is not satisfied, the Founder reviews it personally. If the complaint concerns the Founder, the complainant may ask for review by an independent professional chosen jointly.	Within 10 working days of the request

I.4.2 LAW The Academy's procedure does not affect a learner's legal rights, including the right to approach a Consumer Disputes Redressal Commission under the Consumer Protection Act, 2019, or, once the relevant provisions are in force, the Data Protection Board of India after first using the Academy's grievance procedure.

I.5 Fair investigation and consequences

I.5.1 ACADEMY Investigations are fair, confidential and timely. The person concerned is told of the allegation and has the opportunity to respond before any decision is made.

I.5.2 ACADEMY Consequences are proportionate, as set out in Section O.

Part III — Safeguarding, Wellbeing and Inclusion

Part III adds four sections that the original Code did not contain. Many of the Academy's learners are children, and many make career decisions under pressure. These sections set the minimum standards for keeping them safe.

Section J: Child Protection and Student Safeguarding

> *The safety and best interests of the child come first, above any other consideration, including the wishes of the Academy, a partner institution or a parent. Safeguarding is everyone's responsibility.*

J.1 Designated Safeguarding Lead

J.1.1 ACADEMY The Academy's Designated Safeguarding Lead (DSL) is Dinesh Kumar J, Founder & Chief Growth Mentor, reachable at igrow@successmastersacademy.in and +91 99949 42763. The DSL receives all safeguarding concerns, advises practitioners, keeps safeguarding records and liaises with authorities.

J.2 Legal duty to report

J.2.1 LAW Under Section 19 of the POCSO Act, 2012, any person who has reason to believe that a sexual offence against a child has been committed, or is likely to be committed, must report it to the Special Juvenile Police Unit or the local police.

J.2.2 LAW Failure to report is an offence under Section 21, punishable with imprisonment of up to six months, a fine, or both. A person in charge of an institution who fails to report an offence committed by a subordinate faces a heavier penalty.

J.2.3 LAW ACADEMY The legal duty belongs to the individual who has the information. Informing the DSL does not replace the personal duty to report; the practitioner and the DSL make the report together, without delay. No one in the Academy may discourage, delay or prevent a report.

J.3 Safe conduct with minors

Everyone working with learners under 18 follows these rules:

- Meet minors in open or visible settings. In person, use a room with a door open or a glass panel, or have another adult nearby.
- Communicate with minors only through official Academy channels, and copy or inform the parent or guardian on arrangements.
- Never give a minor a personal phone number, social media contact or private messaging account, and never contact a minor privately.
- Never transport a minor alone or meet a minor outside the agreed service setting.

- Avoid physical contact beyond what is customary and appropriate in a professional setting.
- Never photograph or record a minor without written consent from the parent or guardian and the minor's agreement.
- Never ask a minor to keep a secret, and never single out a minor for gifts, favours or special attention.
- Use respectful, age-appropriate language at all times, including in jokes and examples.
- In online sessions, the parent or guardian knows about the session and remains reachable; the practitioner works from a professional setting.

J.4 Responding to a disclosure or concern

Do	Do not
Stay calm, listen and let the young person speak freely.	Do not interrogate, ask leading questions or investigate yourself.
Reassure them that telling you was the right thing to do.	Do not promise to keep it secret; explain kindly that you must tell people who can help.
Write down what was said, in their words, with the date and time, as soon as possible.	Do not confront the alleged abuser or tell anyone who does not need to know.
Inform the DSL immediately and make the legal report with them.	Do not delay because you are unsure; reasonable belief is enough to report.
If the child is in immediate danger, call 112 first.	Do not inform a parent first if the parent may be involved in the harm.

J.5 Helplines

Service	Number
Emergency Response Support System (police, ambulance, fire)	112
CHILDLINE (children in need of care and protection)	1098
Tele-MANAS, national tele-mental-health helpline	14416 or 1-800-891-4416

J.6 Vulnerable adults and records

J.6.1 ACADEMY The same care applies to adults who may be at risk because of disability, illness or circumstances. Concerns are referred to the DSL.

J.6.2 ACADEMY Safeguarding records are kept separately from career records, with access limited to the DSL.

Section K: Student Wellbeing, Mental Health and Crisis Response

> *Choosing a stream, preparing for an entrance examination or changing careers can be very stressful. The Academy aims to reduce that pressure, never to add to it.*

K.1 LAW ACADEMY In Sukdeb Saha v. State of Andhra Pradesh (2025 INSC 893), the Supreme Court issued guidelines on student mental health and suicide prevention that apply to educational institutions, including coaching institutes and training centres. The Academy aligns its practice with these guidelines. In particular, it maintains referral links with qualified mental-health professionals, trains its staff in recognising distress, displays helpline information, and never segregates, ranks publicly or shames learners on the basis of performance.

K.2 ACADEMY Practitioners avoid "only one path" messages. Every roadmap presents realistic alternatives so that a single examination result is never framed as the end of a learner's future.

K.3 ACADEMY Practitioners complete mental-health first-response training at least once a year.

K.4 Crisis procedure

If a learner expresses thoughts of suicide or self-harm, or the practitioner believes the learner is at immediate risk:

1. Stay with the learner (or on the call) and speak calmly. Take what they say seriously and do not argue with or dismiss their feelings.
2. If there is immediate danger, call 112. For an online session, use the location and emergency contact recorded under clause F.1.2.
3. Connect the learner with Tele-MANAS (14416) or another qualified professional, and inform the parent, guardian or emergency contact.
4. Inform the DSL as soon as the learner is safe.
5. Record what happened, what was said and the actions taken.
6. Follow up with the learner and family within two working days, and pause career work until the learner is ready.

Confidentiality does not prevent these steps (clause B.9.1).

Section L: Diversity, Equity, Inclusion and Accessibility

> *India's diversity of language, region, faith, community, ability and circumstance is a strength. Every learner deserves guidance that sees their whole situation and widens, rather than narrows, their options.*

L.1 LAW STANDARD ACADEMY The Academy does not discriminate on the basis of religion, caste, tribe, sex, gender identity, sexual orientation, disability, age, language, region, marital

status, socioeconomic status or any other characteristic that is not relevant to the service.

L.2 LAW ACADEMY The Academy makes reasonable accommodations for learners with disabilities, consistent with the Rights of Persons with Disabilities Act, 2016. These include accessible digital materials, captions, readable fonts and contrast, flexible scheduling and support in assessments.

L.3 ACADEMY Practitioners ask about caste, community or income only when it is needed to advise on reservation, scholarship or fee-concession eligibility, explain why they are asking, and record it only with consent.

L.4 LAW ACADEMY Transgender and gender-diverse learners are addressed by the name and pronouns they use, and are given guidance free from stereotyping.

L.5 ACADEMY Practitioners pay particular attention to first-generation learners, rural learners and learners from low-income families, explaining options that are not widely known (for example, government scholarships, diploma-to-degree routes and public universities).

L.6 ACADEMY Practitioners challenge stereotypes in career choices, such as the idea that certain fields are only for boys or only for girls, while respecting each learner's own choices.

Section M: Institutional Partnerships, Workshops and Group Programmes

M.1 ACADEMY Every partnership with a school, college, company or NGO is set out in a written agreement covering scope, roles, fees, branding, data sharing, safeguarding responsibilities and the application of this Manual.

M.2 LAW ACADEMY When assessments are conducted for minors through a school, the Academy obtains verifiable consent from each student's parent or guardian. A school's general permission does not replace parental consent for processing a child's personal data.

M.3 ACADEMY Workshops and talks in schools are educational, evidence-based and age-appropriate. They are not sales events: practitioners do not sell services to minors during a session, and any information about paid services is addressed to parents.

M.4 STANDARD ACADEMY In group coaching, ground rules on confidentiality and respect are agreed at the start, and no individual's results are revealed to the group without their consent.

M.5 ACADEMY Reports to partner institutions contain aggregated, de-identified information only, unless clause B.11.1 applies.

M.6 ACADEMY Partner staff who co-deliver Academy programmes are briefed on this Manual and agree to follow it for those programmes.

Part IV — Implementation and Governance

Section N: Roles and Responsibilities

Role	Key responsibilities under this Manual
Founder & Chief Growth Mentor (Dinesh Kumar J)	Owns and approves the Manual; acts as Designated Safeguarding Lead and privacy and grievance contact; maintains the AI tools register and referral list; decides on breaches and sanctions; leads the annual review.
Career coaches and counsellors	Apply the Manual in every engagement; obtain consent; verify information; conduct counsellor-led feedback; report safeguarding and data concerns immediately; complete professional development.
Trainers and workshop facilitators	Deliver age-appropriate, evidence-based content; follow safe-conduct and no-selling-to-minors rules; protect group confidentiality.
Supervisors and senior trainers	Oversee trainees and interns; sign off competence; provide feedback; model ethical practice; escalate concerns.
Interns, trainees and volunteers	Work only under supervision; disclose trainee status to learners; follow all rules on minors and data.
Contractors and freelancers	Follow the Manual for all Academy work; access only the data they need; return or delete data at the end of the engagement.
Technology administrators	Manage access rights, multi-factor authentication, backups and updates; apply retention and deletion schedules; detect and report incidents; check AI tools before approval.
Institutional partners and representatives	Follow the partnership agreement and this Manual for joint programmes; share data only as agreed; report safeguarding concerns.

Section O: Compliance, Monitoring, Breaches and Review

O.1 Acknowledgement and training

O.1.1 ACADEMY Everyone covered by this Manual signs the Acknowledgement and Undertaking (Appendix 6) before starting work and again after each major revision.

O.1.2 ACADEMY Refresher training on the Manual, safeguarding and data protection is held at least once a year.

O.2 Monitoring

O.2.1 ACADEMY Each quarter, the Founder reviews a sample of learner files for consent, accuracy of information, report quality and retention. Each year, the Academy reviews

complaints, incidents, assessment validation data and learner feedback, and records the actions taken.

O.3 Breaches of this Manual

Level	Examples	Possible consequences
Minor	Late case notes; an undated information sheet; occasional use of jargon in reports.	Guidance and correction; supervision.
Moderate	Missing consent form; unverified exam information given to a learner; use of a personal channel with an adult learner.	Written warning; retraining; closer supervision.
Serious	Guaranteeing outcomes; sharing data without consent; entering identifiable learner data into an unapproved AI tool; private contact with a minor.	Final warning, suspension from client work, or ending the engagement or contract.
Gross	Failure to report suspected child sexual abuse; any sexual or exploitative conduct; deliberate deception; retaliation against a person who raised a concern.	Immediate termination and, where required, reporting to the police or other authorities.

O.4 Review and version control

O.4.1 ACADEMY This Manual is reviewed every year in November, and also whenever a relevant law, rule, court direction or professional code changes, or a serious incident shows a gap. The next scheduled review is November 2027.

O.4.2 ACADEMY Learners, families, partners and staff are invited to suggest improvements at any time by writing to igrow@successmastersacademy.in.

Section P: Safeguarding the Academy, Its People and Its Work

> *Ethical practice protects learners first, and it also protects the Academy and the people who serve learners. This section sets out the responsibilities that keep the Academy's work, reputation, people and intellectual property safe.*

P.1 The nature of career guidance

P.1.1 ACADEMY Career guidance, counselling, coaching and assessment reports are advisory. They support informed decisions but do not determine them. Decisions about streams, subjects, courses, colleges, examinations, jobs and careers, and their outcomes, remain the responsibility of the learner and, for a minor, the parent or guardian.

P.1.2 ACADEMY Admission, examination, scholarship and recruitment outcomes depend on independent bodies, competition and individual effort, which the Academy does not control. Service agreements and reports state this clearly.

P.1.3 ACADEMY Information from third parties (such as examining bodies, universities, colleges and employers) can change without notice. The Academy verifies such information when it gives it (clause C.2.1) and advises learners to confirm dates, fees and eligibility on the official source before acting.

P.1.4 ACADEMY General information from the Academy's website, Career Library, workshops, social media and AI assistant is educational and is not personalised advice. Personalised advice is given only within a counselling or coaching engagement.

P.1.5 LAW ACADEMY To the extent permitted by Indian law, the Academy's service agreements limit its liability for decisions and outcomes outside its control. Nothing in this Manual or in any agreement excludes a learner's statutory rights or the Academy's responsibility for its own negligence.

P.2 Responsibilities of learners and families

Learners and their families help make guidance effective and safe. The service agreement asks them to:

- give accurate and complete information, including academic records, health or learning needs relevant to the service, and previous assessments;
- complete assessments honestly and personally, without help from others unless an accommodation has been agreed;
- attend sessions on time, or reschedule in line with the published policy;
- pay fees as agreed, in line with the published fee and refund policy;
- treat Academy staff with courtesy and respect;
- not record sessions without the agreement of the practitioner and the Academy;
- use reports, roadmaps and materials only for their own personal, non-commercial purposes.

P.2.1 ACADEMY Where guidance is based on inaccurate or incomplete information supplied by the learner or family, the Academy is not responsible for the resulting advice, and will revise it once correct information is provided.

P.3 Respectful conduct towards Academy staff

P.3.1 ACADEMY The Academy does not tolerate abusive, threatening, discriminatory or harassing behaviour towards its staff, in person, by phone, by message or online. A practitioner may pause or end a session if such behaviour occurs, and must report it to the Founder.

P.3.2 ACADEMY After a warning, the Academy may end a service because of serious or repeated misconduct by a learner or family member. Any refund then follows the published refund policy. Where the learner is a minor, the Academy first considers whether the behaviour reflects a safeguarding concern (Section J).

P.4 Protecting practitioners from false allegations

P.4.1 ACADEMY The safe-conduct rules in Section J protect practitioners as well as children. Open settings, official communication channels and parental awareness of sessions reduce the risk of misunderstanding or false allegation.

P.4.2 ACADEMY Practitioners keep accurate, dated records of sessions, consent, key advice, and any concern or complaint, written at the time. These records are the Academy's evidence of proper practice.

P.4.3 ACADEMY When an allegation is made against a practitioner, the Academy follows a fair process (clause I.5.1): it acts first to keep any child safe, reports where the law requires, and treats the practitioner fairly and confidentially until the facts are established. A report or investigation is not a finding of wrongdoing.

P.5 Intellectual property

P.5.1 LAW ACADEMY The Academy's assessments (including the Stream Assessment, Career Assessment and Graduate Career Assessment), their items, scoring methods and report formats, the Career Library, the Career Roadmap Planner, programme curricula, training materials, workbooks, slide decks, website content, brand names and logo are the Academy's intellectual property.

P.5.2 ACADEMY Learners receive a personal licence to use their own reports and materials. They may not copy, sell, publish or share assessment items, or reproduce Academy materials for commercial use, without written permission.

P.5.3 LAW ACADEMY Material created for the Academy by employees in the course of their work belongs to the Academy. Material created by contractors and freelancers belongs to the Academy where their written agreement assigns it. Every contractor agreement includes such an assignment.

P.5.4 ACADEMY When an engagement ends, staff and contractors return or delete Academy materials and learner data in their possession, and do not reuse Academy assessments, curricula or templates elsewhere.

P.6 Confidential business information

P.6.1 ACADEMY Staff, contractors and partners keep the Academy's confidential business information confidential during and after their engagement. This includes learner lists and contact details, pricing and partnership terms, assessment scoring keys, unpublished programmes, and internal reports.

P.6.2 ACADEMY While engaged with the Academy, practitioners and contractors do not solicit the Academy's learners, families or partner institutions for private or competing services, and do not use Academy learner data to contact anyone for another business.

P.7 Brand, representation and public statements

P.7.1 ACADEMY Only the Founder, or a person the Founder authorises in writing, speaks to the media, issues public statements, or signs agreements on behalf of the Academy.

P.7.2 ACADEMY The iGrow name, logo and brand assets are used only in approved materials. Staff and contractors do not create social media pages, groups, websites or advertisements in the Academy's name without approval.

P.7.3 ACADEMY In personal social media, staff do not post confidential information, criticise learners or partners, or present personal opinions as the Academy's position.

P.8 Contracts, records and risk management

P.8.1 ACADEMY Every engagement with a learner, partner institution, contractor or vendor is documented in writing: a service agreement, partnership agreement or contract that references this Manual where relevant.

P.8.2 ACADEMY Consent forms, invoices, receipts, refund decisions, complaint records and incident records are kept for the periods in clause B.6.1, so that the Academy can show what was agreed and done.

P.8.3 GOOD PRACTICE The Academy reviews each year whether its insurance, including professional indemnity and cyber cover, is adequate for its services.

P.8.4 ACADEMY Any threat of legal action, consumer complaint, regulatory notice, data breach or media enquiry is passed to the Founder on the same day, and no one responds on the Academy's behalf without the Founder's approval.

Appendices

Appendix 1: Informed Consent Checklist

The Academy's consent form or digital consent flow covers each of these points. The practitioner explains them in conversation as well.

- ☐ The service being provided (career information, guidance and counselling, or coaching), its goals and the number of sessions.
- ☐ The names of the assessments to be used, what they measure, their limitations, and that results are indicative rather than predictive.
- ☐ Who will see the results, and that reports are explained in a counsellor-led session.
- ☐ The fees, what they include, payment terms and the refund policy.
- ☐ Whether the Academy may use legal action or a collection agency for unpaid balances, and the opportunity to pay first (clause A.4.2).
- ☐ The personal data collected, its purposes, how long it is kept, and how to ask for access, correction or erasure.
- ☐ The limits of confidentiality, including the legal duty to report child abuse and serious risk of harm.
- ☐ Whether sessions will be recorded (only with separate consent).
- ☐ Whether and how AI is used in the service.
- ☐ Involvement of a trainee, if any, and the right to request a qualified practitioner.
- ☐ For learners under 18: verifiable consent of the parent or guardian, and the learner's own agreement.
- ☐ The right to refuse or withdraw at any time.
- ☐ How to raise a concern or complaint: igrow@successmastersacademy.in, +91 99949 42763.

Appendix 2: Safeguarding Concern — Step-by-Step

Step	Who	Action
1	Any staff member	If a child is in immediate danger, call 112.
2	Person receiving the concern	Listen, reassure, do not investigate, and do not promise secrecy (Section J.4).
3	Person receiving the concern	Write down the facts and the child's words, with the date and time, and sign the note.
4	Person receiving the concern	Inform the DSL immediately (+91 99949 42763).

Step	Who	Action
5	Person receiving the concern with the DSL	Report to the Special Juvenile Police Unit or local police without delay, as required by Section 19 of the POCSO Act. Contact CHILDLINE 1098 for support where needed.
6	DSL	Inform the partner institution's designated person if the concern arose in a school or college programme, unless doing so could put the child at risk.
7	DSL	Store records securely and separately; arrange support and follow-up for the child and for the staff member involved.

Appendix 3: Ethical Decision-Making Worksheet

Use these questions, with the seven-step model in Section I.2, when a situation is unclear. Keep a short record of the answers.

1. What exactly is the issue, and who is affected by it?
2. Is anyone at risk of harm right now? If so, what must I do first?
3. Which clauses of this Manual apply? Is there a legal duty involved?
4. Which values are in tension (for example, autonomy versus protection)?
5. What do the learner and their family want, and why?
6. Who should I consult before acting?
7. What are my realistic options, and what are the likely consequences of each?
8. Which option best serves the learner within the law?
9. Could I comfortably explain my decision to the learner, their family and a colleague?
10. What will I record, and when will I review the outcome?

Appendix 4: Glossary

Term	Meaning in this Manual
Assent	The agreement of a young person under 18 to take part, given in addition to the parent's or guardian's consent.
Career coaching	A goal-focused, learner-led process that helps a person act on career decisions and develop professionally.
Career guidance and counselling	Structured exploration of interests, abilities, values and options to support educational and career decisions.
Counsellor-led report	An assessment report that is explained to the learner by a counsellor before or when it is released.
Data Fiduciary	Under the DPDP Act, the person or organisation that decides the purpose and means of processing personal data.

Term	Meaning in this Manual
Data Protection Board of India	The statutory body set up under the DPDP Act to handle breaches and complaints.
Designated Safeguarding Lead (DSL)	The person responsible for receiving and acting on safeguarding concerns at the Academy.
Learner	Any student, graduate or professional receiving an Academy service, including parents and guardians where relevant.
Minor or child	A person under 18 years of age.
Practitioner	Anyone who delivers guidance, counselling, coaching, training or assessment for the Academy.
Reliability	The consistency of an assessment's results.
Validity	The degree to which evidence supports the intended interpretation and use of assessment results.
Verifiable consent	Consent of a parent or lawful guardian whose identity and relationship can be confirmed, as described in the DPDP Rules, 2025.

Appendix 5: Sources and References

These sources were consulted in preparing this Manual. Official texts should always be checked for the latest version.

- Digital Personal Data Protection Act, 2023 and Digital Personal Data Protection Rules, 2025 — Ministry of Electronics and Information Technology, meity.gov.in
- Protection of Children from Sexual Offences Act, 2012 — indiacode.nic.in
- Consumer Protection Act, 2019; Guidelines for Prevention of Misleading Advertisements and Endorsements, 2022; Guidelines for Prevention of Misleading Advertisement in Coaching Sector, 2024 — Central Consumer Protection Authority, doca.gov.in
- Guidelines for Registration and Regulation of Coaching Center, 2024 — Ministry of Education, Department of Higher Education, education.gov.in
- Sukdeb Saha v. State of Andhra Pradesh & Ors., 2025 INSC 893 (Supreme Court of India, 25 July 2025) — sci.gov.in
- Rehabilitation Council of India Act, 1992 — rehabcouncil.nic.in
- Rights of Persons with Disabilities Act, 2016; Transgender Persons (Protection of Rights) Act, 2019; Sexual Harassment of Women at Workplace Act, 2013; Information Technology Act, 2000 — indiacode.nic.in
- CERT-In Directions under Section 70B(6) of the IT Act, 28 April 2022 — cert-in.org.in
- India AI Governance Guidelines, November 2025 — Ministry of Electronics and Information Technology, indiaai.gov.in
- National Career Development Association, 2024 NCDA Code of Ethics — ncda.org

- International Coaching Federation, ICF Code of Ethics (in force 1 April 2025) — coachingfederation.org
- International Association for Educational and Vocational Guidance, IAEVG Ethical Guidelines (2025) — iaevg.com
- AERA, APA and NCME, Standards for Educational and Psychological Testing (2014); International Test Commission, Guidelines on Test Use; ISO 10667-1 and -2, Assessment service delivery
- National Education Policy, 2020 — Ministry of Education, education.gov.in
- iGrow Success Masters Academy, Career Counselling Programs — successmastersacademy.in/career-counselling-programs/

Appendix 6: Acknowledgement and Undertaking

I have received, read and understood the iGrow Success Masters Academy Code of Conduct & Professional Ethics Manual (Version 2.0, November 2026). I have had the opportunity to ask questions about it.

I agree to follow this Manual in all my work for or on behalf of the Academy. I understand in particular my personal legal duty to report suspected sexual abuse of a child under the POCSO Act, 2012, my duties to protect personal data, and the safe-conduct rules for working with minors. I understand that a breach of this Manual may lead to the consequences described in Section O.

Full name_____

Role (employee, coach, trainer, intern, contractor, partner)_____

Signature_____

Date_____

Received on behalf of iGrow Success Masters Academy by Dinesh Kumar J, Founder & Chief Growth Mentor.

Signature_____

Date_____