Prevention of Sexual Harassment (POSH) Policy 2025

Farmers Organisation for Research Welfare Agriculture and Rural Development (FORWARD)

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Foreword

At **Farmers Organisation for Research Welfare Agriculture and Rural Development (FORWARD)**, we believe that a safe, inclusive, and respectful workplace is fundamental to achieving our mission of empowering communities and fostering sustainable development. Every individual working with us—whether an employee, intern, volunteer, or partner—has the right to dignity, equality, and protection from any form of harassment.

Sexual harassment is a serious violation of human rights and professional ethics. In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, this policy has been framed to ensure zero tolerance toward any act of sexual harassment and to promote a culture of safety, trust, and accountability within the organization.

This document outlines the definitions, procedures, responsibilities, and redressal mechanisms to address and prevent sexual harassment at all levels of our functioning. The Internal Complaints Committee (ICC) constituted under this policy is empowered and committed to handling complaints sensitively, confidentially, and in a time-bound manner.

We urge all team members to read this policy carefully and act responsibly to create a work environment where everyone feels secure, valued, and respected.

Let us work together to make FORWARD a model of gender-sensitive, safe, and ethical professional practice.

Date: 25/05/2025
Place: Limaliguda

Triptirani Pramanik
(Signature)
Ms. Triptirani Pramanik
Chief Executive Officer (CEO)
FORWARD

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Part A: Introduction

1. Purpose of the Policy

This policy has been developed to provide a safe and secure working environment, free from sexual harassment, for every woman associated with the organization—whether employed directly or indirectly. It aims to promote a workplace where dignity, respect, and equal opportunity are upheld for all, especially women, by:

- Preventing and addressing incidents of sexual harassment at the workplace.
- Establishing an effective complaint redressal mechanism.
- Ensuring compliance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and related rules.

2. Scope and Applicability

This policy applies to all women, regardless of their nature of employment or association with the organization, who may be subjected to sexual harassment at any of FORWARD's workplaces.

2.1 Who is covered?

This policy applies to all women who are:

- Regular, temporary, part-time, or full-time employees
- Interns and apprentices (paid or unpaid)
- Volunteers and consultants
- Contractual workers, outsourced personnel, or those working through third-party arrangements
- Visitors, clients, or partners present at the workplace

2.2 What is covered?

This policy is applicable to:

- All locations where FORWARD operates: including head offices, branch offices, project locations, and partner locations.
- All activities and interactions that arise out of or during the course of employment or organizational association, including:
    - ✓ Work-related travel (by public, private, or office-arranged transport)

- ✓ Training programs, workshops, field visits, surveys, outreach events
- ✓ Conferences, review meetings, and networking events
- ✓ Work-related gatherings and social functions (official or semi-official)
- ✓ Online and digital platforms used for work (email, messaging apps, video calls, virtual meetings)

2.3 Extra-Territorial Applicability

The policy also applies if:

- The incident of harassment occurs outside the office premises but is connected to the workplace or arises during the course of employment or work assignments.
- The respondent is an employee of FORWARD and the aggrieved woman is a visitor, partner, or stakeholder engaging in official activities.

3. Definitions

3.1 Sexual Harassment

Sexual harassment constitutes any unwelcome act or behaviour (whether directly or by implication) that is sexual in nature and occurs at the workplace. As per **Section 2(n)** of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, it includes but is not limited to:

Physical, verbal, or non-verbal conduct such as:

- Unwelcome physical contact and advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography or sexually explicit content
- Unwelcome sexual gestures, staring, or leering
- Uninvited comments on a person's appearance, body, or clothing
- Repeated and unwelcome social invitations or flirting
- Sending inappropriate or offensive messages, emails, or images

Other acts considered as sexual harassment:

- Implied or explicit promise of preferential treatment in exchange for sexual favours
- Implied or explicit threat of detrimental treatment in the workplace
- Implied or explicit threat about the present or future employment status
- Interference with work or creation of an intimidating or hostile work environment

- Humiliating treatment likely to affect health or safety

3.2 "Workplace" includes:

1. Any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the government or local authority or a government company or corporation.
2. Any private sector organization or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organization, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service.
3. Hospitals or nursing homes.
4. Sports institutes, stadiums, sports complexes or competition or games venues, whether residential or not used for training, sports or other activities.
5. Any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking such journey.
6. A dwelling place or a house, if the employee is working there as a domestic worker.
7. Virtual workplaces, including emails, chats, Zoom/Teams meetings, official WhatsApp groups, and other digital/online spaces used for professional interactions.

3.3 "Employee" means:

Any person (irrespective of gender) employed at a workplace for any work on:

- a regular, temporary, ad hoc, or daily wage basis, either directly or through an agent (including a contractor),
- with or without the knowledge of the principal employer,
- whether for remuneration or not,
- working full time, part-time, or on a voluntary basis.

It includes, but is not limited to:

- Contract workers
- Apprentices
- Trainees or interns (paid or unpaid)
- Consultants or freelance workers
- Probationers
- Temporary staff
- Domestic workers (in applicable contexts)
- Any person rendering services at the workplace

This inclusive definition ensures all individuals engaged in any capacity with the organization are protected under the POSH policy and are also bound by its provisions.

3.4 "Aggrieved Woman" means:

— Any woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent at a workplace.

This includes:

- Women employed at the workplace (in any capacity: permanent, temporary, part-time, contract, intern, etc.)
- Women visiting the workplace (clients, customers, vendors, consultants, etc.)
- Domestic workers working in a household (where applicable)
- Third parties present at the workplace for business or professional reasons

Key Points:

- The Act recognizes that employment status is not a requirement to be considered an aggrieved woman.
- The protection applies regardless of the woman's hierarchy, designation, or contractual relationship with the organization.
- In line with the POSH Act, the term specifically applies to women, though many organizations extend protections to all genders in their internal policies for inclusivity.

3.5 "Respondent" means:

— The person against whom the aggrieved woman has made a complaint of sexual harassment under the provisions of the POSH Act.

This includes:

- Any employee, regardless of position, designation, or employment status (regular, temporary, contractual, intern, volunteer, etc.)
- A supervisor, colleague, or subordinate
- In some cases, even a third party (such as a vendor, service provider, visitor, or customer), if the act occurred in connection with the workplace

Key Points:

- The respondent can be any individual (typically male or of any gender depending on policy scope) alleged to have committed sexual harassment.
- The identity of the respondent must be kept confidential throughout the inquiry process, as per the confidentiality provisions under the Act.
- The organization must ensure a fair and unbiased inquiry process for both the aggrieved woman and the respondent.

3.6 "Employer" means:

— In relation to any workplace:

1. **In the government sector**:
   The head of the department, organization, institution, or undertaking (or any person responsible for management, supervision, and control of the workplace).
2. **In the private sector or non-governmental organizations (NGOs)**:

   - Any person responsible for the management, supervision, and control of the workplace.
   - This includes the person discharging contractual obligations with respect to employees or workers.
   - It may also include a partner in a firm, a board member, managing trustee, managing director, chief executive officer, office bearer, or any person responsible to the employer for management and supervision of the workplace.

Key Responsibilities of the Employer under POSH:

- Constitution of the Internal Committee (IC) at each workplace with 10 or more employees.
- Display of POSH policy, consequences of sexual harassment, and contact details of the IC.
- Sensitization and training of employees and IC members.
- Providing safe working environment for all employees.
- Ensuring confidentiality, fair inquiry, and timely redressal of complaints.
- Filing annual reports with the appropriate District Officer on the number of cases reported and disposed.

3.7 The Internal Committee (IC): It is a body constituted by the employer in every workplace having **10 or more employees**, to receive and redress complaints of sexual harassment as per the provisions of the POSH Act.

Composition of the Internal Committee:

The IC must consist of the following members:

1. **Presiding Officer** – A woman employee at a senior level in the organization.
2. **Two or more members** – From among the employees, preferably:
    - ✓ Committed to the cause of women, or
    - ✓ Having experience in social work, or
    - ✓ Having legal knowledge.
3. **External Member** – From an NGO or association committed to the cause of women, or a person familiar with issues relating to sexual harassment.

At least 50% of the members must be women.

Key Responsibilities of the IC:

- Receive complaints of sexual harassment.
- Conduct inquiries in a fair, unbiased, and timely manner.
- Recommend actions to the employer based on inquiry findings.
- Maintain confidentiality throughout the process.
- Prepare and submit an annual report to the employer and District Officer with details of:
    - ✓ Number of complaints received,
    - ✓ Number of complaints resolved,
    - ✓ Action taken, and
    - ✓ IC awareness and training activities.

Part B: Policy Framework – Prohibition of Sexual Harassment

4. Prohibition of Sexual Harassment

The organization adopts a **zero-tolerance approach** to sexual harassment and is committed to creating and maintaining a **safe, inclusive, and respectful work environment** for all employees, regardless of gender, designation, or employment status.

Sexual harassment at the workplace is **strictly prohibited** and shall constitute a serious misconduct, punishable under the **POSH Act, 2013**, the organization's disciplinary rules, and applicable service or employment laws.

5. Principles Governing the Policy

This policy is guided by the following core principles that ensure a safe, dignified, and equitable work environment for all individuals associated with the organization:

a. Zero Tolerance

The organization maintains **zero tolerance** toward any form of sexual harassment. All complaints will be treated with utmost seriousness, and appropriate disciplinary action will be taken against proven misconduct.

b. Dignity and Respect

Every individual has the right to work in an environment free from harassment, intimidation, and offensive behavior. The policy upholds the **dignity, privacy, and respect** of all persons involved.

c. Gender Sensitivity and Inclusivity

While the POSH Act is centered on the protection of women, the organization strives to foster a **gender-sensitive and inclusive** environment, extending protection and redressal to all employees irrespective of gender, wherever applicable.

d. Confidentiality

Strict **confidentiality** shall be maintained throughout the complaint handling and inquiry process, in accordance with the provisions of the POSH Act. The identity of the complainant, respondent, and witnesses will not be disclosed except as required by law.

e. Fairness and Natural Justice

All proceedings under this policy will adhere to the principles of **natural justice**, ensuring that:

- The aggrieved person is heard,
- The respondent is given an opportunity to respond,
- The Internal Committee acts in an unbiased, impartial manner.

f. Timely Redressal

All complaints will be addressed in a **prompt and time-bound** manner, as prescribed under the POSH Act and rules.

g. Awareness and Sensitization

The organization shall take continuous efforts to create awareness and build capacity through **training programs**, orientation sessions, and public display of the policy to prevent sexual harassment and promote workplace sensitivity.

6. Rights of Employees under the Policy

This policy ensures that all employees of the organization are aware of their rights and are empowered to work in a safe, equitable, and respectful environment. The following rights are guaranteed under this policy:

a. Right to a Safe Workplace

Every employee has the right to a **safe, harassment-free work environment**, whether at the office, in the field, during travel, or in any virtual/digital space associated with work.

b. Right to Protection from Sexual Harassment

All employees, regardless of gender, position, or nature of employment, have the **right to be protected** from any act of sexual harassment at the workplace, as defined by this policy and the POSH Act, 2013.

c. Right to File a Complaint

Any aggrieved woman (as per the Act) has the right to **file a complaint of sexual harassment** with the Internal Committee (IC) within the specified time frame (usually within **3 months** from the date of the incident or the last incident, extendable by another 3 months for valid reasons).

d. Right to a Fair and Timely Inquiry

Employees have the right to a **fair, impartial, and time-bound inquiry** process that upholds the principles of natural justice, ensuring that both the complainant and the respondent are heard and treated with dignity.

e. Right to Confidentiality

All employees involved in a POSH matter – including the complainant, respondent, witnesses, and IC members – have the right to confidentiality of identity and proceedings, as mandated under the Act.

f. Right to Protection Against Retaliation

The policy ensures that no employee shall face **victimization, retaliation, or discrimination** for:

- Filing a complaint,
- Participating in an inquiry as a witness, or
- Supporting the aggrieved person.

Any such action will be treated as a separate offence and dealt with strictly.

g. Right to Support and Assistance

Complainants have the right to seek:

- Transfer or leave during the pendency of the complaint,
- Counselling or medical assistance, where needed,
- Legal aid or protection, depending on the situation.

7. Employer's Responsibilities

The organization, through its employer and designated authorities, bears the primary responsibility to create, maintain, and enforce a work environment that is safe, respectful, and free from sexual harassment. In accordance with Section 19 of the POSH Act, 2013, the following responsibilities shall be fulfilled by the Employer:

a. Constitution of the Internal Committee (IC)

- Constitute an Internal Committee at every office or workplace with 10 or more employees, as per legal requirements.
- Ensure timely appointment and training of IC members.
- Replace or reconstitute IC members when necessary.

b. Policy Implementation and Display

- Formally adopt and implement this POSH Policy across all offices and project locations.
- Prominently display at conspicuous places:
    - ✓ The penal consequences of sexual harassment,
    - ✓ The contact details of the IC, and
    - ✓ The organization's commitment to a harassment-free workplace.

c. Awareness and Capacity Building

- Conduct regular training and awareness programs for all employees, including new hires.

- Organize orientation and capacity-building sessions for IC members to ensure fair and sensitive handling of complaints.

d. Redressal of Complaints

- Provide all necessary assistance to the Internal Committee during inquiry.
- Act upon the recommendations of the IC in a time-bound manner.
- Ensure that no person is victimized or harassed for initiating or participating in any complaint or inquiry under the POSH framework.

e. Confidentiality

- Ensure confidentiality is maintained throughout the process, including identity of the complainant, respondent, witnesses, and details of the proceedings and recommendations.

f. Annual Reporting

- Facilitate the IC in preparing and submitting the Annual Report to the District Officer and organizational management, detailing:

  ✓ Number of complaints received and resolved,
  ✓ Types of actions taken,
  ✓ Awareness activities conducted.

g. Safe Work Environment

- Take proactive steps to provide a safe and inclusive work culture, including:

  ✓ Functional grievance redressal mechanisms,
  ✓ Gender-sensitive infrastructure,
  ✓ Support systems like counselling or legal aid when required.

Part C: Constitution of the Internal Committee (IC)

8. Composition of the Internal Committee

In compliance with Section 4 of the POSH Act, 2013, the organization shall constitute an Internal Committee (IC) at each office or operational unit with 10 or more employees, to redress complaints related to sexual harassment at the workplace.

a. Structure of the Internal Committee

The IC shall comprise the following members:

1. **Presiding Officer**
   – A **senior-level woman employee** from the organization, preferably committed to the cause of women or with experience in social work/legal knowledge.
2. **Two or more Employee Members**
   – Employees from the organization having:
   - ✓ Experience in social work, or
   - ✓ Commitment to the cause of women, or
   - ✓ Knowledge of law, gender, or human rights.
3. **One External Member**
   – From an NGO, women's rights organization, or someone familiar with issues relating to sexual harassment, gender justice, or legal matters.
   - ✓ This member must not be currently employed by the organization, ensuring impartiality and independence.

b. Guidelines for Composition

- At least 50% of the total members must be women.
- The IC must reflect diversity and sensitivity to gender and social equity.
- The IC must be formally notified and its members designated in writing by the employer.

c. Term of Office

- The IC members shall hold office for a period of three years from the date of their nomination.
- The employer reserves the right to remove or replace any member before the term ends due to:

  - ✓ Misconduct,
  - ✓ Breach of confidentiality,
  - ✓ Conflict of interest,
  - ✓ Or unavailability to serve effectively.

d. Replacement and Reconstitution

- If any IC member is unable to continue, the employer shall nominate a replacement member following the same criteria.
- The IC shall be reconstituted in case of changes in organizational structure, workforce size, or if required by law.

9. Tenure and Removal of Internal Committee (IC) Members

a. Tenure of IC Members

- All members of the Internal Committee (IC), including the Presiding Officer and external member, shall serve a term of three (3) years from the date of their nomination.
- Members may be re-nominated at the end of their term, subject to performance, organizational needs, and compliance with statutory norms.
- During the term, IC members are expected to:

  - ✓ Remain active and available for proceedings,
  - ✓ Undergo orientation or capacity-building sessions, and
  - ✓ Uphold the confidentiality and integrity of the committee's work.

b. Grounds for Removal or Disqualification

An IC member may be removed or disqualified before the completion of the term by the employer on the following grounds:

1. Disclosure of confidential information in violation of Section 16 of the POSH Act.
2. Misuse of power or position as a committee member.
3. Proven conflict of interest in any case being handled by the IC.
4. Criminal conviction, particularly for an offence involving moral turpitude.
5. Abuse of authority, intimidation, or unfair treatment of parties involved in a POSH inquiry.
6. Absence from IC duties or continued non-participation in proceedings without valid reason.
7. Breach of the organization's code of conduct or ethical standards.

c. Procedure for Removal

- A written complaint or observation regarding misconduct or incapacity of an IC member may be submitted to the employer.
- The employer shall initiate a preliminary inquiry.
- If grounds are established, the member may be formally removed and a replacement nominated as per the POSH Act.

10. Roles and Responsibilities of the Internal Committee (IC)

The Internal Committee (IC) is the statutory body responsible for ensuring effective prevention, prohibition, and redressal of sexual harassment at the workplace in accordance with the POSH Act, 2013. The IC must carry out its duties with neutrality, confidentiality, and sensitivity.

a. Key Roles of the Internal Committee

1. **Receiving Complaints:**
   - ✓ Accept complaints of sexual harassment from aggrieved women at the workplace.
   - ✓ Guide the complainant on the complaint filing process.
2. **Preliminary Assessment:**
   - ✓ Assess whether the complaint is within the scope of the POSH Act.
   - ✓ If outside jurisdiction, inform the complainant accordingly and recommend alternate redressal mechanisms, if any.
3. **Inquiry Process:**
   - ✓ Conduct a fair, neutral, and time-bound inquiry into the complaint.

- ✓ Provide both parties (complainant and respondent) an equal opportunity to be heard.
- ✓ Maintain complete confidentiality throughout the proceedings.

4. **Submission of Findings:**

   - ✓ Submit a reasoned report of findings to the employer within 10 days of completion of the inquiry.
   - ✓ Recommend appropriate disciplinary action or other measures based on the findings.

5. **Interim Relief:**

   - ✓ Recommend interim measures during the inquiry, such as:
     - Transfer of either party,
     - Leave for the aggrieved woman (up to 3 months),
     - Restraining the respondent from contacting the complainant.

6. **Conciliation (if requested):**

   - ✓ Facilitate conciliation before initiating inquiry, if the aggrieved woman so requests in writing.
   - ✓ Ensure that monetary settlement is not made as a basis for conciliation.

7. **Annual Reporting:**

   - ✓ Compile and submit an annual report to the employer and the District Officer detailing:
     - Number of complaints received and disposed,
     - Types of action taken,
     - Awareness and training activities conducted.

b. Additional Responsibilities:

- Create awareness among employees about their rights under the POSH Act.
- Ensure safe and supportive redressal environment for all parties.
- Maintain a record of all complaints, inquiries, and outcomes, subject to confidentiality provisions.
- Participate in capacity-building and sensitization programs to enhance understanding of gender justice and workplace safety.

Part D: Complaint Mechanism – 11. Filing a Complaint

11. Filing a Complaint

The organization encourages all individuals to report incidents of sexual harassment without fear of retaliation or discrimination. Complaints must be filed with the **Internal Committee (IC)** in writing, in accordance with the procedure laid down by the **POSH Act, 2013**.

a. Who Can File a Complaint

A complaint of sexual harassment can be filed by:

1. **Aggrieved Woman**
   - Any woman (employee or not), who alleges to have been subjected to sexual harassment at the workplace.
2. **Legal Heir or Representative**

   ✓ In case the aggrieved woman is physically or mentally incapable, or is deceased, her legal heir, guardian, or any person authorized can file the complaint on her behalf.

3. **Others on Behalf of the Victim** (with consent)

   ✓ In case of severe trauma or incapacity, any person may file the complaint on behalf of the aggrieved woman, with her written consent.

b. Timeframe for Filing a Complaint

- The complaint must be filed within 3 months from the date of the incident, or in the case of a series of incidents, within 3 months from the date of the last incident.
- The Internal Committee may extend this time limit by another 3 months if it is satisfied that:

  ✓ There were sufficient grounds for the delay, and
  ✓ The delay was justified due to exceptional circumstances (e.g., trauma, illness, travel).

12. Receipt and Acknowledgement of Complaint

Once a complaint of sexual harassment is submitted by the aggrieved woman or her representative, the Internal Committee (IC) shall formally receive and acknowledge it in a timely and confidential manner.

a. Mode of Submission

The complaint must be submitted in writing, and may be:

- Hand-delivered to any member of the Internal Committee,
- Submitted through post/courier to the designated office,
- Sent via official email to the IC (if such an email ID is provided by the organization).

If the complaint is made orally, the IC shall assist the complainant in reducing it to writing and getting it signed.

b. Acknowledgement of Complaint

- Upon receipt, the IC shall issue a written acknowledgement to the complainant within 2 working days, confirming that the complaint has been received and is being reviewed.
- The acknowledgement shall include:

  - ✓ Date of receipt,
  - ✓ Complaint reference number,
  - ✓ Names of IC members who received it,
  - ✓ A brief outline of the next steps in the process.

c. Registration and Documentation

- The complaint shall be recorded in the IC's complaint register (physical or digital) with proper serial numbering for reference and tracking.
- The IC shall maintain all documentation securely and confidentially, accessible only to authorized IC members.

d. Confidentiality Assurance

The IC shall ensure strict confidentiality of:

- The identity of the complainant and respondent,
- Witnesses and proceedings,
- Any related documentation or communication.

Breach of confidentiality by any party involved may attract disciplinary action as per Section 16 of the POSH Act.

13. Assistance to Aggrieved Woman

The organization is committed to ensuring that the aggrieved woman feels safe, supported, and empowered to file and pursue a complaint of sexual harassment. The Internal Committee (IC) and the employer shall extend necessary assistance as per the provisions of the POSH Act, 2013.

a. Assistance in Filing the Complaint

- If the aggrieved woman is unable to write the complaint, the IC shall:
    - ✓ Provide assistance in documenting it in writing,
    - ✓ Help articulate the details in a clear and respectful manner,
    - ✓ Ensure that the complaint is signed or acknowledged by the complainant.

b. Assistance in Case of Physical or Mental Incapacity

If the aggrieved woman is physically or mentally incapable, or is legally incapacitated, the complaint may be filed by:

- Her legal heir or guardian,
- A relative or friend,
- A co-worker,
- Any person who has knowledge of the incident, with appropriate authorization.

The IC shall ensure such representatives are provided respectful guidance on the process.

c. Interim Relief during Inquiry

Upon written request by the aggrieved woman, the IC may recommend to the employer the following interim measures during the pendency of the inquiry:

- Transfer of the aggrieved woman or the respondent to another department or location,
- Grant of leave up to 3 months (in addition to any entitled leave),
- Restriction of the respondent from communicating with the aggrieved woman directly or indirectly,
- Any other measure deemed appropriate for the safety and comfort of the complainant.

The employer shall act on such recommendations promptly and in good faith.

d. Counseling and Support

- The organization may provide **access to counselling**, mental health support, or legal guidance where necessary.
- The IC shall inform the aggrieved woman of **her rights** and **available remedies**, including filing a criminal complaint if the incident constitutes an offence under the Indian Penal Code.

14. Conciliation Process (Optional)

The **POSH Act, 2013** allows the option of **conciliation** as a means of resolving a complaint, but only **at the request of the aggrieved woman**. The Internal Committee (IC) shall facilitate this process with utmost care and neutrality, while safeguarding the dignity and interests of the complainant.

a. Voluntary Request

- Conciliation shall be initiated only if the aggrieved woman makes a written request for it before the commencement of the formal inquiry.
- The IC cannot suggest or force conciliation on its own.

b. Conditions for Conciliation

- Monetary settlement shall not be made the basis of conciliation, as explicitly prohibited under the Act.
- The purpose of conciliation is to reach a mutually acceptable resolution that ensures dignity, safety, and closure for the aggrieved woman.

c. Procedure

1. The IC shall receive the written request and convene a **conciliation meeting** between both parties at a mutually agreed time.
2. The IC shall ensure the process is:

   - ✓ Voluntary, non-coercive, and confidential,
   - ✓ Handled sensitively and fairly, with equal opportunity for both parties to be heard.

d. Outcome and Closure

- If conciliation is successful, the IC shall record the settlement agreement in writing, signed by both parties.
- A copy of the settlement shall be provided to the aggrieved woman and the respondent.
- Upon execution of the settlement, no further inquiry shall be conducted on the complaint by the IC.
- If the respondent fails to comply with any term of the settlement, the IC shall initiate a formal inquiry into the original complaint.

e. Confidentiality

All details of the conciliation proceedings—including discussions, identities, and outcomes—shall be kept strictly confidential by all parties involved.

Part D: Complaint Mechanism

15. Inquiry Process

If no conciliation is opted for or if conciliation fails, the Internal Committee (IC) shall initiate a formal inquiry into the complaint of sexual harassment in accordance with the principles of natural justice and the procedures laid out under the POSH Act, 2013.

a. Notice to Parties

- Upon initiation of the inquiry, the IC shall serve a written notice to both the complainant and the respondent within 7 working days of receipt of the complaint (or conclusion of conciliation, if applicable).
- The notice shall:
  - ✓ Clearly state the allegations made,
  - ✓ Include a copy of the written complaint and related documents,
  - ✓ Specify the date, time, and venue for the first hearing,
  - ✓ Ask for a written response from the respondent within 10 working days from receipt of notice.

b. Right to Representation

- The POSH Act does not permit legal representation for either party during the internal inquiry.
- However, both parties are entitled to:
  - ✓ Present their case and evidence,
  - ✓ Call witnesses,
  - ✓ Respond to each other's submissions,
  - ✓ Be accompanied by a colleague or support person from the workplace (as a moral support, not for representation).

The IC will conduct the inquiry in a manner that is non-adversarial, employee-friendly, and respectful to both parties.

c. Confidentiality

- All proceedings, documentation, identities, and outcomes shall be kept strictly confidential, as mandated under Section 16 of the POSH Act.
- Disclosure by any party (complainant, respondent, witnesses, IC member) may invite disciplinary or legal action.
- The IC may remind all parties of their duty to maintain confidentiality before and during hearings.

d. Timeline

- The IC must complete the entire inquiry process within 90 days from the date of receipt of the complaint.

- The inquiry report, including findings and recommendations, must be submitted to the employer within 10 days of completion of the inquiry.
- The employer must act on the IC's recommendations within 60 days of receiving the report.

Part E: Outcome and Action

16. Inquiry Report

Upon completion of the inquiry, the Internal Committee (IC) shall prepare a detailed, reasoned report documenting the process followed, evidence examined, and findings reached in relation to the complaint of sexual harassment.

a. Timeline for Submission

- The IC must submit the inquiry report to the employer and to both the complainant and the respondent within 10 days from the date of completion of the inquiry proceedings.

b. Contents of the Report

The report shall include:

1. Details of the complaint and allegations raised.
2. Summary of proceedings (dates of hearings, witnesses examined, and materials reviewed).
3. Statements and evidence presented by both parties.
4. Findings of the IC, based on a fair evaluation of the evidence.
5. Conclusion on whether the alleged incident(s) constitute sexual harassment as defined under the POSH Act.
6. Recommendations for action, as applicable.

c. Possible Findings

1. **Complaint is proven**:

   ✓ If the IC concludes that sexual harassment has occurred, it shall recommend appropriate action to the employer (see Section 17).

2. **Complaint is not proven**:

   - ✓ If the IC finds no merit in the allegations, it shall close the case with due justification and recommend no action against the respondent.

3. **Malicious or false complaint**:

   - ✓ If the IC believes the complaint was filed maliciously or with false intent, it may recommend action against the complainant only after due inquiry and if malicious intent is clearly established (see Section 18).

Note: A mere inability to prove a complaint does not amount to malicious intent.

d. Confidentiality

- The contents of the report and its recommendations shall be kept **confidential** and shared only with:
  - ✓ The complainant,
  - ✓ The respondent,
  - ✓ The employer/authorized management,
  - ✓ Relevant legal authorities, if required.

Any unauthorized disclosure may lead to disciplinary or legal consequences.

17. Action Based on Findings

Based on the findings and recommendations of the Internal Committee (IC), the employer is responsible for taking appropriate and timely action to ensure justice, deterrence, and a safe working environment. All actions must be in accordance with the organization's service rules, standing orders, and applicable labour laws.

a. If the Complaint is Proven (Sexual Harassment is Established)

If the IC concludes that the respondent has committed an act of sexual harassment, it may recommend one or more of the following disciplinary actions, which the employer must act upon within 60 days of receiving the report:

- Written apology from the respondent
- Warning or reprimand in the personnel file
- Counseling or mandatory sensitization training

- Withholding of promotion, pay increment, or bonus
- Transfer or reassignment of the respondent
- Suspension for a defined period
- Termination or dismissal from service
- Deduction from salary or wages to be paid as compensation to the aggrieved woman (if directed under Section 15 of the POSH Act)

Note: In case of contractual or third-party employees, the employer may recommend termination of contract or blacklisting of the individual/vendor.

b. If the Complaint is Not Proven

If the IC concludes that the allegations do not amount to sexual harassment, or are not substantiated, the complaint shall be dismissed with no action against the respondent.

However, the IC may still recommend steps to restore professional harmony, such as:

- Transfer of either party (upon request),
- Sensitization or workplace behaviour training,
- Follow-up monitoring for a period after closure.

c. If the Complaint is Found to be Malicious or False

In rare cases where it is established (after due inquiry) that the complaint was made with malicious intent or knowingly false evidence was presented, the IC may recommend action against the complainant, such as:

- Warning or written reprimand
- Disciplinary action as per service rules
- Any other corrective measures deemed appropriate

Important: The inability to prove a complaint does not imply malice. Action against the complainant can only be recommended if intentional falsehood or malice is conclusively proven.

d. Employer's Responsibility

- Ensure the timely execution of IC's recommendations.
- Inform both parties in writing of the action taken or reasons for non-action within 60 days.
- Maintain confidential records of all actions taken under this provision.

18. Punishment for False or Malicious Complaints

The POSH Act, 2013 recognizes that while it is essential to provide protection to aggrieved women, safeguards must also be in place to prevent the misuse of the law. Therefore, the organization takes false, malicious, or intentionally misleading complaints seriously, but only when such intent is clearly established through an inquiry.

a. Conditions for Action

- Action for false or malicious complaints shall only be initiated if:
    - ✓ The Internal Committee (IC), after conducting a thorough inquiry, concludes that:
        - The complaint was filed with malicious intent, or
        - The complainant knowingly made false allegations, or
        - Forged, misleading, or manipulated evidence was presented.
- Mere inability to substantiate a complaint or lack of sufficient evidence shall not be construed as a false or malicious complaint.

b. Possible Disciplinary Actions

If malicious intent is proven, the IC may recommend the following disciplinary actions against the complainant or any person who made a false claim or presented false evidence:

- Written warning or reprimand
- Counseling or awareness training
- Adverse remark in personnel record
- Withholding of promotion/increment
- Suspension or termination, in severe cases
- Any other corrective measure in accordance with the organization's service rules

c. Safeguards and Fairness

- No action shall be taken against the complainant without due inquiry and an opportunity to be heard.
- The IC shall ensure that genuine complaints are not discouraged due to fear of punitive action.
- The IC shall act with caution and only recommend punishment where malafide intent is clearly proven.

d. Protection Against False Accusations for All Parties

- The same principles apply if a witness or respondent submits false or fabricated information during the proceedings.

The organization's goal is to balance the right to redressal with the need to prevent misuse, thereby preserving the credibility of the complaint process and ensuring fairness for all.

19. Appeal Process

Both the complainant and the respondent have the right to appeal against the findings and/or recommendations of the Internal Committee (IC) or the action taken (or not taken) by the employer, as per the provisions of the POSH Act, 2013.

a. Right to Appeal

An appeal may be filed by:

- The aggrieved woman (complainant),
- The respondent, or
- Any person aggrieved by the recommendations of the IC or by the employer's decision on the inquiry report.

b. Grounds for Appeal

Appeals may be filed in cases of:

- Disagreement with the findings of the IC,
- Disproportionate or unjust disciplinary action,
- Non-implementation of IC recommendations by the employer,
- Procedural lapses or denial of natural justice.

c. Timeline for Filing an Appeal

- The appeal must be filed within 90 days from the date:
  - ✓ The IC's recommendations were communicated, or
  - ✓ The employer conveyed the decision based on the inquiry report.

d. Appellate Authority

The appeal must be filed before the appropriate appellate authority, depending on the employment context:

- For government employees – with the prescribed authority under applicable service rules.
- For private sector employees or NGOs – with the Appellate Authority under Section 2(a) of the Industrial Employment (Standing Orders) Act, 1946, or as applicable.
- Alternatively, an appeal may also be filed before the District Officer, Labour Court, or appropriate tribunal, as per the legal provisions and employment category.

e. Support During Appeal

- The organization may provide the concerned party with access to case documentation (as per confidentiality norms) to support the appeal process.
- Both parties are entitled to legal support outside the IC proceedings during the appeal stage.

f. No Retaliation

- No adverse action shall be taken against any employee solely for exercising their right to appeal.
- The organization shall ensure a fair, non-discriminatory approach while the appeal is pending.

Part F: Support, Awareness & Prevention

20. Awareness, Training, and Sensitization

The organization is committed to preventing sexual harassment at the workplace by fostering a culture of respect, dignity, and gender sensitivity. To ensure this, continuous efforts shall be made to educate, empower, and sensitize all stakeholders through awareness and training initiatives.

a. Awareness among Employees

- Conduct regular awareness sessions for all employees (including interns, volunteers, and contract staff) on:

- ✓ The provisions of the POSH Act and this policy,
- ✓ What constitutes sexual harassment,
- ✓ How and where to file a complaint,
- ✓ The redressal process and safeguards.

- Display this policy and IC contact details prominently at all workplaces and field offices, including digital platforms.

b. Capacity Building of the Internal Committee (IC)

- Organize specialized orientation programs and refresher trainings for IC members to:

  - ✓ Understand their powers and responsibilities under the POSH Act,
  - ✓ Conduct fair, unbiased, and trauma-informed inquiries,
  - ✓ Maintain neutrality and confidentiality throughout proceedings.

- Encourage IC members to attend external legal and gender justice workshops to enhance their capability.

c. Sensitization of Senior Management and Supervisors

- Ensure that managers and supervisors undergo gender sensitization training to recognize, prevent, and appropriately respond to sexual harassment.
- Train leadership to:

  - ✓ Promote a respectful work culture,
  - ✓ Intervene early in potential harassment situations,
  - ✓ Support complainants and prevent retaliation.

d. Induction Programs

- Include a briefing on POSH policy as part of the onboarding process for all new employees, with a mandatory declaration of understanding and compliance.

e. Community and Partner Engagement (for NGOs and field staff)

- For community-facing roles, include field-level sensitization with:

  - ✓ Partner organizations,
  - ✓ Community volunteers,

- ✓ Field animators and associates,
- ✓ Vendors or third-party service providers.

f. Use of Multiple Channels

- Utilize posters, e-newsletters, emails, team meetings, and digital platforms to regularly disseminate POSH awareness messages.

21. Employee Orientation and Annual Training

The organization recognizes that ongoing education and regular training are critical to preventing sexual harassment and ensuring that all employees are aware of their rights, responsibilities, and redressal mechanisms under the POSH Act, 2013.

a. Orientation at the Time of Induction

- Every new employee (including interns, consultants, volunteers, and contractual staff) shall receive an orientation on the POSH Policy during the onboarding process.
- The induction session shall cover:

  - ✓ What constitutes sexual harassment,
  - ✓ Roles and responsibilities of employees and supervisors,
  - ✓ The Internal Committee (IC) structure and contact information,
  - ✓ The complaint redressal process and timelines,
  - ✓ Rights of the aggrieved person and safeguards in place.

Employees shall be required to sign a declaration stating they have read, understood, and will comply with the POSH Policy.

b. Annual Training and Refresher Programs

- The organization shall conduct annual POSH training sessions for all employees, regardless of designation or location.
- The sessions shall include:

  - ✓ Case studies and scenario-based learning,
  - ✓ Legal updates and real-life examples,
  - ✓ Gender sensitivity and respectful workplace behavior,
  - ✓ Reporting mechanisms and consequences for violations.

These may be conducted in-person or online, depending on team location and availability.

c. Role-Specific POSH Training

- Specialized training shall be organized for:
  - ✓ Supervisors and managers – to identify early signs of misconduct, support employees, and act responsibly,
  - ✓ HR teams – to coordinate with the IC and maintain proper documentation,
  - ✓ Field workers and community-facing staff – to manage sensitive interactions and uphold the organization's code of conduct in remote or informal workspaces.

d. Monitoring Participation

- Attendance in induction and annual training sessions shall be mandatory.
- The organization will maintain a training attendance log and regularly monitor coverage.
- Non-participation without valid reason may lead to follow-up or corrective action.

e. Language and Accessibility

- All orientation and training materials shall be delivered in languages understood by participants (including regional languages where applicable).
- Efforts will be made to ensure materials are inclusive, easy to understand, and culturally sensitive.

22. Safe Workplace Measures

The organization is committed to creating and maintaining a safe, inclusive, and respectful work environment that is free from sexual harassment, discrimination, and intimidation. To this end, a combination of preventive, infrastructural, behavioural, and procedural safeguards shall be implemented across all offices and field locations.

a. Physical and Infrastructural Safety

- Ensure well-lit and secure office premises, especially in common areas such as entrances, restrooms, and corridors.
- Maintain separate and clean sanitation facilities for women employees.
- Install CCTV surveillance (as applicable) in public spaces while respecting individual privacy.

- Provide safe transport options for late-working employees, especially women, where feasible.

b. Digital and Virtual Workplace Safety

- Promote safe usage of email, virtual meeting platforms, and messaging apps used for official communication.
- Implement IT policies that prohibit the use of sexually explicit content, offensive jokes, or inappropriate communication via work devices or channels.
- Enable employees to report harassment or misconduct in virtual settings (e.g., video calls, chats, emails).

c. Behavioral and Cultural Norms

- Promote a culture of mutual respect, inclusion, and accountability.
- Ensure zero tolerance for sexist remarks, verbal abuse, body shaming, or inappropriate conduct — even if not directed at any specific individual.
- Encourage bystander intervention by sensitizing employees on how to report or intervene when witnessing inappropriate behaviour.

d. Policy Visibility and Communication

- Display the POSH Policy, IC contact details, and anti-harassment posters in prominent locations within office premises and field units.
- Ensure accessible digital versions of the policy are available to all employees.
- Reinforce messages on respectful behavior through internal newsletters, bulletin boards, and team briefings.

e. Regular Monitoring and Feedback

- Designate a POSH compliance officer or HR focal person to conduct periodic checks and gather feedback on safety practices.
- Enable employees to share concerns or suggestions anonymously through feedback boxes, forms, or helplines.
- Review incidents, if any, to identify systemic issues and take preventive corrective actions.

f. Emergency Support and Counselling

- Provide access to confidential counseling services or referrals for psychological support, especially for complainants.
- Ensure that IC members or designated staff are available to respond swiftly to urgent safety concerns.

23. Counselling and Support Services

The organization understands that incidents of sexual harassment can cause emotional distress, trauma, and psychological impact on those affected. To uphold the dignity and well-being of all employees, appropriate counselling and support services shall be made available to anyone in need, especially the aggrieved woman.

a. Psychological and Emotional Support

- The organization shall facilitate access to **professional counselling services**, either through:
  - ✓ In-house counsellors,
  - ✓ Partner NGOs/mental health professionals,
  - ✓ Referrals to certified external service providers.
- These services may include:
  - ✓ One-on-one trauma-informed counselling sessions,
  - ✓ Emotional support during or after the inquiry process,
  - ✓ Mental health assessments, where required.

b. Support During Inquiry

- The Internal Committee (IC) shall:
  - ✓ Ensure the complainant and respondent are informed of the availability of support services.
  - ✓ Create a non-threatening, empathetic environment during proceedings.
  - ✓ Allow either party to request a support person (colleague, friend, or IC-approved associate) to accompany them during meetings, provided confidentiality is maintained.

c. Post-Inquiry Follow-up

- After the completion of an inquiry, the IC or HR team may arrange follow-up sessions to:
  - ✓ Check on the emotional well-being of the aggrieved person,
  - ✓ Offer continued support and rehabilitation where needed,
  - ✓ Help with reintegration into the workplace (if the complainant was on leave or transferred).

d. Legal and Informational Support

- The IC shall provide the complainant with:
  - ✓ Information on legal rights and remedies (e.g., filing an FIR in case of a cognizable offence),
  - ✓ Assistance in approaching external legal aid if required.
- Respondents and witnesses may also be referred to counselling services, especially if affected by the process or its outcome.

e. Confidentiality and Voluntary Participation

- All counselling and support services shall be:
  - ✓ Confidential, non-judgmental, and based on the individual's consent.
  - ✓ Voluntary in nature—no one shall be compelled to attend counselling sessions.

Part G: Records and Reporting

24. Documentation and Confidentiality

Proper documentation and strict confidentiality are central to the integrity of the Internal Committee (IC) proceedings and the overall implementation of the POSH Policy. The organization is committed to maintaining accurate records while safeguarding the privacy, dignity, and safety of all parties involved.

a. Documentation and Record-Keeping

The Internal Committee (IC) shall maintain the following records in a secure and confidential manner:

- Complaints received (with serial numbers and dates),
- Minutes of IC meetings and inquiry proceedings,
- Statements, evidence, and witness accounts,
- Inquiry reports and recommendations,
- Action taken by the employer,
- Settlement agreements (if applicable),
- Correspondence with parties involved.

These records shall be kept in physical and/or digital formats, protected with restricted access, and shall be preserved for a minimum of 3 years, or as required by applicable laws.

b. Annual Reporting

The IC shall submit an Annual Report to the employer and the District Officer (as per Section 21 of the POSH Act) that includes:

- Number of sexual harassment complaints received,
- Number of complaints disposed of,
- Number of cases where action was taken,
- Number of pending cases,
- Awareness programs and capacity-building activities conducted.

The organization shall include a summary of POSH compliance in its annual reports or board disclosures, if applicable.

c. Confidentiality Obligations

As per Section 16 of the POSH Act, the following information shall not be published, communicated, or disclosed to the public, press, or media in any manner:

- The identity and address of the complainant, respondent, or witnesses,
- Information relating to the inquiry proceedings,
- Recommendations of the IC, or
- Action taken by the employer.

Any breach of confidentiality by any party (including IC members, complainant, respondent, witnesses, or employer representatives) shall be considered a **serious violation** and may invite disciplinary and/or legal action.

d. Internal Access and Security

- Only authorized personnel (IC members, designated HR/legal staff) shall have access to POSH-related documentation.
- Digital records shall be stored with secure passwords, and physical files in locked cabinets.
- The organization may, from time to time, audit documentation practices to ensure compliance and security.

25. Annual Report by the Internal Committee (IC)

In accordance with Section 21 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Committee (IC) is required to prepare and submit an Annual Report to ensure transparency, accountability, and legal compliance.

a. Purpose of the Annual Report

The annual report serves to:

- Provide a summary of complaints handled during the year,
- Highlight actions taken by the IC and the employer,
- Document preventive measures and awareness initiatives undertaken,
- Facilitate compliance with statutory reporting requirements.

b. Reporting Authority

- The IC Chairperson shall ensure that the annual report is submitted to:
  - ✓ The Employer or Organization Head, and
  - ✓ The District Officer designated under the POSH Act.

c. Contents of the Annual Report

The report shall include the following details for the calendar year or financial year, as specified:

1. Number of complaints of sexual harassment received during the year,
2. Number of complaints disposed of,
3. Number of cases pending for more than 90 days,
4. Nature of action taken by the employer (in proven cases),
5. Number of workshops, orientation, and awareness programs carried out,
6. Observations or recommendations by the IC on POSH implementation or workplace culture (if any),
7. Any challenges or gaps encountered in implementation of the policy.

The format may be customized to meet the reporting guidelines issued by the District Officer or appropriate authority.

d. Timeline and Format

- The annual report shall be compiled at the end of each calendar year and submitted by January 31st of the following year, or as per local district instructions.
- The report must be submitted in writing (hard copy or email) in the format prescribed by local authorities (if applicable).

e. Confidentiality in Reporting

- The report shall include only **aggregate and anonym zed data**.
- **Identities of complainants, respondents, and witnesses shall not be disclosed**, in compliance with Section 16 of the POSH Act.

26. Reporting to the District Officer

As mandated by Section 21 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Committee (IC) must report annually to the District Officer appointed by the appropriate government for monitoring implementation of the Act.

a. Statutory Obligation

- Every employer or organization through its Internal Committee shall submit an annual report to the District Officer in the jurisdiction where the registered office or unit is located.
- The District Officer is the designated authority under the POSH Act responsible for:

  - ✓ Receiving POSH compliance reports,
  - ✓ Overseeing redressal mechanisms in workplaces within the district,
  - ✓ Referring unresolved or non-compliant matters to higher authorities if needed.

b. Contents of the Report

The report submitted to the District Officer shall contain:

1. Number of sexual harassment complaints received during the calendar year,
2. Number of complaints disposed of,
3. Number of complaints pending for more than 90 days,
4. Number of workshops or awareness programs carried out for employees,
5. Nature of action taken by the employer in cases where sexual harassment was established.

The IC may also include any **recommendations, suggestions, or observations** to strengthen workplace safety and POSH policy implementation.

c. Timeline for Submission

- The report must be submitted annually, usually by January 31st of the following year or as per the deadline communicated by the District Officer.
- Any **interim reporting** required by the District Officer (during high-profile cases, legal reviews, etc.) shall also be complied with.

d. Mode and Format of Submission

- The IC shall obtain or download the **prescribed format** (if any) from the District Office.
- The report may be submitted:

  - ✓ In hard copy by post or hand-delivery,
  - ✓ Or digitally, via email or online portal (where such a facility exists).

The organization shall **retain an acknowledgment** or proof of submission for internal compliance records.

e. Coordination and Oversight

- The IC Chairperson or a designated Compliance Officer shall be responsible for timely and accurate reporting to the District Officer.
- A copy of the report shall be shared with the employer for organizational records and further action, if needed.

27. Monitoring and Review

To ensure that the POSH Policy remains effective, relevant, and responsive to the evolving needs of the organization and its workforce, the organization shall put in place a structured mechanism for periodic monitoring, evaluation, and review of the policy and its implementation.

a. Periodic Monitoring

- The **Internal Committee (IC)**, in coordination with the **Human Resources (HR)** or **Compliance Officer**, shall regularly monitor:

  - ✓ The number and nature of complaints filed,
  - ✓ Timeliness and fairness of redressal processes,
  - ✓ Effectiveness of awareness and training activities,
  - ✓ Adherence to confidentiality and documentation protocols,
  - ✓ Safety measures at physical and virtual workplaces.

b. Internal Audits and Compliance Checks

- The organization may conduct **internal audits** or **compliance assessments** (annually or bi-annually) to:

  - ✓ Review how well the POSH mechanisms are functioning,
  - ✓ Identify gaps in policy implementation or safety infrastructure,
  - ✓ Recommend improvements to reporting systems, outreach, and redressal procedures.

c. Employee Feedback and Learning

- Feedback from employees and IC members will be periodically collected (e.g., via surveys, interviews, or suggestion boxes) to assess:
    - ✓ Awareness of the POSH Policy,
    - ✓ Confidence in the redressal process,
    - ✓ Perceived safety and inclusiveness of the workplace.
- Insights from **real cases and lessons learned** will be used to enhance training materials and preventive actions.

d. Annual Policy Review

- The POSH Policy shall be **reviewed annually** by the IC in consultation with HR, legal advisors, or external gender experts (if needed).
- The review shall take into account:
    - ✓ Legislative amendments to the POSH Act,
    - ✓ Organizational structural or operational changes,
    - ✓ Emerging risks or trends in the workplace or sector.

Revised policies shall be approved by the management and re-communicated to all employees through orientation sessions and written updates.

e. Amendment and Version Control

- Any modification or update to the policy must be formally recorded with:
    - ✓ Date of revision,
    - ✓ Summary of changes,
    - ✓ Approval by authorized management personnel.
- The latest version of the policy shall be made available to all employees through the organization's notice boards, website, and employee portals.

Annexure 1: Sexual Harassment Complaint Form

(To be submitted to the Internal Committee in a sealed envelope or via designated email/portal)

A. Complainant's Information

1. Full Name:
2. Designation:
3. Department/Unit:
4. Employee ID (if applicable):
5. Contact Number:
6. Email ID:
7. Work Location/Office:

B. Respondent's Information

1. **Full Name:**
2. **Designation (if known):**
3. **Department/Unit (if known):**
4. **Relationship to the Complainant (e.g., supervisor, peer, external vendor):**

C. Incident Details

1. **Date(s) of Incident(s):**
2. **Time(s) (if known):**
3. **Location(s) of Incident(s):**
4. **Was the incident reported earlier to anyone? If yes, provide details:**

D. Description of the Incident

(Please describe the nature of the sexual harassment faced. Include relevant facts, behavior, language used, physical/verbal gestures, etc. Attach extra sheets if necessary.)

E. Witnesses (if any)

1. **Name(s) of Witness(es):**
2. **Contact Details (if available):**

3. **Relationship to Complainant (e.g., colleague, supervisor):**

F. Relief or Action Requested (Optional)

(Please mention any interim relief or action you are seeking such as transfer, leave, counselling, etc.)

G. Supporting Documents

(Attach any relevant emails, messages, photographs, documents, or recordings that may support your complaint.)

Declaration

I, the undersigned, hereby declare that the information provided above is true to the best of my knowledge and belief. I understand that submitting false or malicious complaints may result in disciplinary action under the POSH Policy.

Signature of the Complainant: _____
Date: _____

Annexure 2: Format of IC's Inquiry Report

(To be prepared by the Internal Committee upon completion of the inquiry into a complaint of sexual harassment)

A. General Information

1. **Name of the Organization:**
2. **Name of the Complainant:**
3. **Name of the Respondent:**
4. **IC Case Number:**
5. **Date of Complaint Submission:**
6. **Date of Completion of Inquiry:**
7. **Names of IC Members Involved in the Inquiry:**

- ✓ Chairperson:
- ✓ Member(1):
- ✓ Member (2):

- ✓ External Member:
- ✓ Employee Representative:

B. Summary of Complaint

- Brief description of the nature of the complaint, including:
  - ✓ Date(s) and place(s) of alleged incident(s)
  - ✓ Type(s) of harassment alleged (verbal, physical, visual, etc.)
  - ✓ Whether any previous complaints were made

C. Respondent's Reply

- Summary of the respondent's written and oral response/defense to the allegations.

D. Inquiry Process Details

1. **Dates of IC Meetings/Hearings Held:**
2. **Witnesses Examined:**
   - ✓ Names and designations
3. **Documents Reviewed:**
   - ✓ Emails, messages, CCTV footage, etc.

E. Findings of the Internal Committee

- Evaluation of evidence and testimonies
- Whether the allegations are substantiated (fully, partially, or not substantiated)
- Analysis in the context of Section 2(n) and 2(o) of the POSH Act (definition of sexual harassment and workplace)

F. Conclusion

- Whether the Respondent is found **Guilty** or **Not Guilty** of sexual harassment under the POSH Act.

G. Recommendations of the IC

- Written apology
- Warning or reprimand
- Counselling/Training
- Withholding promotion/increment
- Transfer
- Suspension
- Termination of employment
- Deduction from salary for compensation
- No action (complaint not proven)
- Action against complainant (in case of malicious complaint, if proven)

H. Signature of IC Members

Name	Designation in IC	Signature	Date
Ms. Triptirani Pramanik	Chairperson	Triptirani Pramanik	25.05.2025
Ms. Dumuni Tudu	Member	Dumuni Tudu	25.05.2025
Mr. Pintu Samantaray	Member	Pintu Samantaray	25.05.2025
Ms. Geetanjali Mishra	External Member		25.05.2025
Ms. Sabita Bira	External Member		25.05.2025

I. Date of Submission to Employer: 21/06/2025

Annexure 3: Contact Details of Internal Committee (IC) Members

Sl.No	Name	Designation	Role in ICC	Contact Number	Office Address
1	Ms. Triptirani Pramanik	CEO	Presiding Officer	+91-7978323998	Tiring
2	Ms. Dumuni Tudu	HR-Admin Coordinator	Member (Employee Rep)	+91-8144042095	Tiring
3	Ms. Geetanjali Mishra	External Consultant	External Member	+91-8917248497	Cuttack
4	Ms. Sabita Bira	External Consultant	External Member	+919348494403	Bhubaneswar
5	Mr. Pintu Samantaray	Programme Coordinator	Member (Support Staff)	+91-7735431970	Tiring

Note:

- This list must be updated whenever there is a change in IC composition.
- The contact information should be **displayed at prominent locations** in the office premises and made accessible to all employees while ensuring privacy and respect.

Annexure 4: Do's and Don'ts at the Workplace

(To promote respectful, inclusive, and harassment-free conduct)

✅DO's

1. **Treat everyone with dignity and respect**, regardless of gender, caste, age, background, or designation.
2. **Maintain professional boundaries** in all interactions—physical, verbal, and virtual.
3. **Speak up or report** any unwelcome behavior or discomfort, either as a victim or witness.
4. **Listen respectfully** if someone shares a concern, and guide them to appropriate support or the Internal Committee (IC).
5. **Ask for consent** before physical contact, even for casual gestures like hugs or pats on the back.
6. **Be mindful of language**, jokes, or comments that could be considered offensive or inappropriate.
7. **Attend POSH trainings** and orientation sessions to stay informed about your rights and responsibilities.
8. **Respect confidentiality** of all parties involved in a complaint or inquiry process.
9. **Encourage a safe reporting environment** by supporting colleagues who come forward with complaints.
10. **Follow organizational policy** while using email, social media, or messaging platforms for professional communication.

✖DON'Ts

1. ✖Don't make **sexually coloured remarks, jokes, or innuendos**, even in a casual or humorous context.
2. ✖Don't share **offensive or explicit content**, including memes, photos, or messages, in any form (email, chat, posters, etc.).
3. ✖Don't **stare, comment, or make gestures** that make someone feel uncomfortable or unsafe.
4. ✖Don't engage in **unwelcome touching, invasion of personal space, or physical advances**.
5. ✖Don't **ask personal questions** related to someone's appearance, relationship status, or private life.
6. ✖Don't **abuse power or authority** to solicit favors or make others feel vulnerable.
7. ✖Don't **ignore or suppress** complaints of sexual harassment—silence enables misconduct.
8. ✖Don't **retaliate against anyone** who files a complaint or participates in the inquiry process.
9. ✖Don't **trivialize or gossip** about sensitive matters related to complaints or IC proceedings.
10. ✖Don't believe that harassment only happens in formal office settings—it can occur in **virtual meetings, emails, or during fieldwork and travel.**

Annexure 5: Relevant Legal Provisions (POSH Act, 2013)

This annexure summarizes key provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, which forms the legal foundation of the organization's POSH Policy.

1. Definition of Sexual Harassment [Section 2(n)]

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

- Physical contact and advances,
- A demand or request for sexual favours,
- Making sexually coloured remarks,
- Showing pornography,
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

2. Scope of Workplace [Section 2(o)]

The term "workplace" includes:

- Offices, branches, units, and any place visited by the employee during employment,
- Fieldwork, travel, training sessions, or external events,
- Work from home/virtual or digital spaces related to employment.

3. Aggrieved Woman [Section 2(a)]

Any woman—irrespective of age or employment status—who alleges to have been subjected to sexual harassment at a workplace. This includes:

- Regular, temporary, ad hoc, or daily wage workers,
- Trainees, interns, volunteers, and contractual employees.

4. Constitution of Internal Committee [Section 4]

- FORWARD organization has 5 members and constituted an **Internal Committee (IC)**.
- The IC consists of:

- ✓ A **Presiding Officer** (senior woman employee), Ms Trupti Pramanik, CEO
- ✓ **Two employee members** committed to women's rights or social work,
- ✓ **One external member** from an NGO or association familiar with gender issues.

5. Complaint and Inquiry Process [Sections 9–11]

- **Complaint must be filed within 3 months** of the incident (extendable to 6 months in certain cases).
- **Inquiry must be completed within 90 days** of receiving the complaint.
- Both parties must be given an **equal opportunity** to present their case.
- **Confidentiality** must be strictly maintained throughout.

6. Action on Inquiry Findings [Section 13]

- If allegations are proven, the IC may recommend:
  - ✓ Written apology, warning, or counselling,
  - ✓ Salary deduction or compensation,
  - ✓ Termination or disciplinary action.
- The employer must act on IC's recommendations **within 60 days**.

7. False or Malicious Complaints [Section 14]

- The IC may recommend action against the complainant if it is proved that the complaint was **malicious or knowingly false**.
- Inability to substantiate a complaint **does not attract punishment** by default.

8. Confidentiality [Section 16]

- No person shall publish or disclose:
  - ✓ The identity of the complainant, respondent, or witnesses,
  - ✓ Details of the inquiry,
  - ✓ Recommendations or action taken.

Violation of confidentiality may lead to disciplinary/legal consequences.

9. Duties of the Employer [Section 19]

Employers must:

- Provide a safe working environment,
- Display the consequences of sexual harassment,
- Organize awareness and orientation programs,
- Assist the IC in conducting inquiries,
- Act on IC's recommendations in a time-bound manner,
- Submit annual reports to the District Officer.

10. Reporting to the District Officer [Section 21]

The IC must submit an Annual Report to the District Officer with:

- Number of complaints received, resolved, and pending,
- Actions taken,
- Awareness programs conducted.

Annexure 6: Awareness Materials / Posters

(To be displayed at prominent and accessible locations within the organization)

"SAY NO TO SEXUAL HARASSMENT!"
"Your Workplace Must Be Safe, Dignified & Respectful for All"
"What is Sexual Harassment?"

Any unwelcome act of a sexual nature, including but not limited to:

- Inappropriate touching or gestures
- Sexually coloured remarks or jokes
- Display of obscene content (online or offline)
- Requests for sexual favours
- Unwelcome advances or stalking
- Comments on appearance/body
- Harassment during fieldwork, online meetings, or over phone

You Have the Right to Speak Up

If you feel harassed, discriminated, or unsafe—report it confidentially.
Your complaint will be treated with dignity, fairness, and strict confidentiality.

Prevention of Sexual Harassment (POSH) Policy 2025

Farmers Organisation for Research Welfare Agriculture and Rural Development (FORWARD)
Limaliguda, PO-Jaltar, Via-Gunupur, Dist-Rayagada, Odisha-765022

Contact the Internal Committee (IC)

Sl.No	Name	Designation	Role in ICC	Contact Number
1	Mrs.Triptirani Pramanik	CEO	Presiding Officer	+91-7978323998
2	Ms. Dumuni Tudu	Admin Coordinator	Member (Employee Rep)	+91-8144042095
3	Ms. Geetanjali Mishra	External Consultant	External Member	+91-8917248497
4	Ms. Sabita Bira	External Consultant	External Member	+919348494403
5	Mr. Pintu Samantaray	Programme Coordinator	Member (Support Staff)	+91-7735431970

POSH Awareness is Mandatory

- Read the full POSH Policy
- Attend orientation and training sessions
- Respect everyone—zero tolerance for misconduct
- Retaliation or victim-blaming is a punishable offense

Break the Silence. Report Harassment.
Together, Let's Make Our Workplace Safe for All.

This poster should be printed in **English** and local language(s), and displayed in:

- Office notice boards
- Common areas (reception, pantry, restrooms)
- Field training centers
- Internal digital platforms

Drop your written complaint in the POSH Complaint Box or send it to:
posh.forward95@gmail.com
Contact No: 9692497635

(Approved by the Board of FORWARD Organisation on 25/05/2025)

President
FORWARD

SECRETARY
FORWARD