

POSH DOCUMENTATION HANDBOOK



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INTRODUCTION



Why Proper Documentation Matters?

Proper documentation under the POSH Act, 2013 is not just a compliance requirement—it is a pillar of fairness, transparency, and trust within every organisation.

- When documentation is well-maintained, it provides evidence that the organisation has taken proactive steps to prevent and redress sexual harassment.
- Accurate records help Internal Committees (ICs) conduct inquiries smoothly, protect the rights of both complainants and respondents, and ensure that decisions are well-supported.
- Poor or missing documentation can make even the best-intentioned inquiry appear biased or incomplete.
- The true strength of the POSH mechanism lies not just in policies, but in how systematically they are recorded, communicated, and implemented.



WHO IS RESPONSIBLE FOR MAINTAINING THESE RECORDS?

The Internal Committee (IC), chaired by a senior female employee and comprising trained members, is primarily responsible for maintaining PoSH documentation

Additionally, the HR department or legal team may assist in maintaining and securely storing these records to ensure accessibility during audits or investigations.

The IC must also collaborate with external consultants, if engaged, to document training, awareness, and compliance initiatives effectively.

Legal Basis of POSH Documentation

Under **Section 23**, every employer must maintain records of:

- IC constitution and training.
- Complaints received and actions taken.
- Annual reports submitted to the District Officer.

Section 16 mandates confidentiality, ensuring no publication of names, details, or case content to protect the dignity of all parties involved.



STORING POSH DOCUMENTATION: BALANCING SECURITY AND ACCESSIBILITY

Storing PoSH Documents Physically

Recommended Approach:

- Maintain a separate file or folder for each case, labelled with a reference number rather than names.
- Store files in a locked cabinet located in a secure HR or legal office.
- Restrict access to authorised IC members only, with a clear record of who accesses the files.
- Use durable, tamper-proof folders, and ensure the storage space is fireproof and humidity-controlled.

Why It Helps:

- Simplifies physical verification during audits or statutory inspections.
- Provides immediate availability of records during internal reviews or IC meetings.

Limitations:

- Prone to damage, loss, or unauthorised handling if not monitored regularly.
- Difficult to manage when multiple offices or branches are involved.

Storing PoSH Documents Digitally

Recommended Approach:

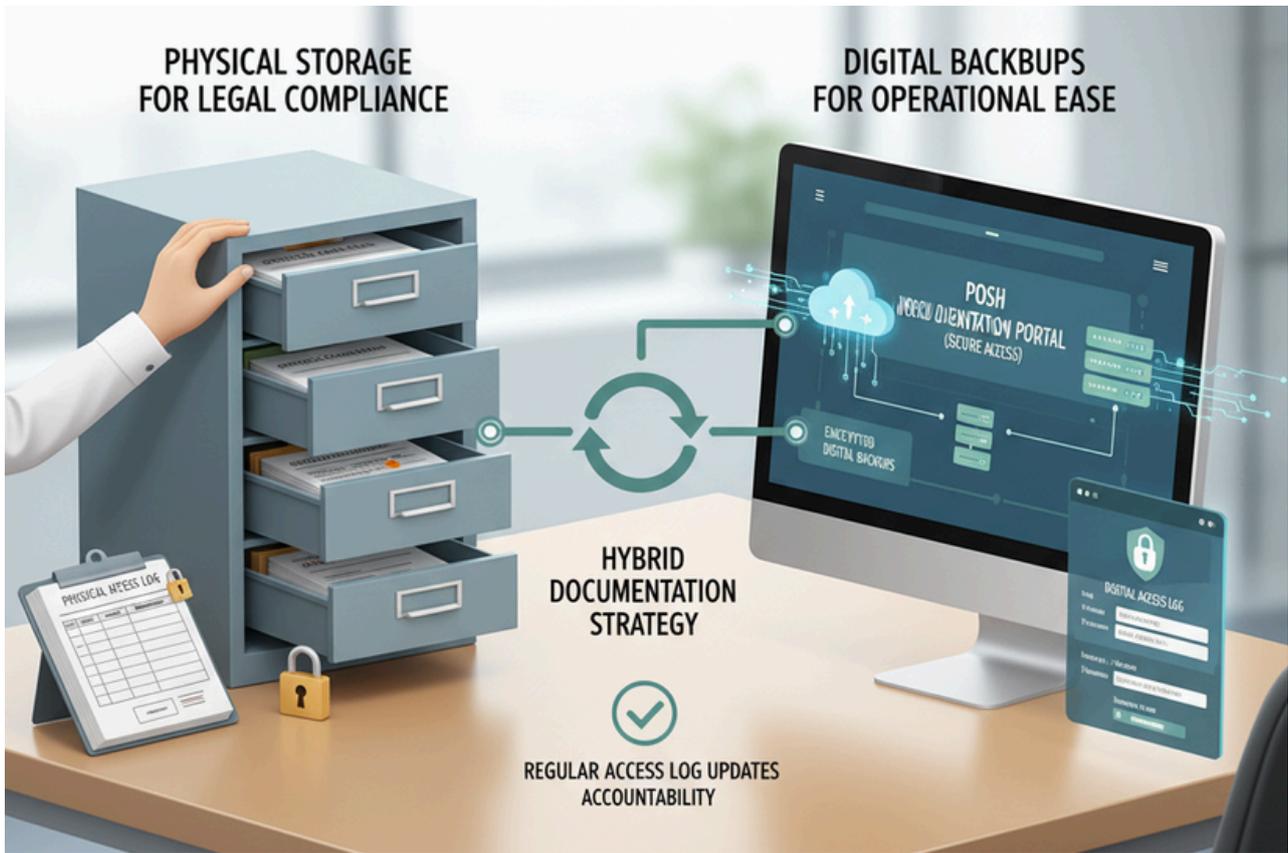
- Create encrypted digital folders for each complaint, case, or preventive activity (e.g., training sessions).
- Store these on a secure cloud service or internal server with limited access rights.
- Enable multi-factor authentication (MFA) and role-based access controls to ensure only authorised users can view sensitive data.
- Back up data regularly to prevent loss from system crashes or ransomware attacks.

Why It Helps:

- Records are searchable and easy to retrieve during audits or IC reporting.
- Reduces paper clutter and improves operational efficiency.
- Simplifies multi-location access for large or remote organisations.

Limitations:

- Requires ongoing IT security and compliance monitoring.
- Vulnerable to cyber threats if systems are outdated or unmonitored.



The Ideal Approach: A Hybrid Model

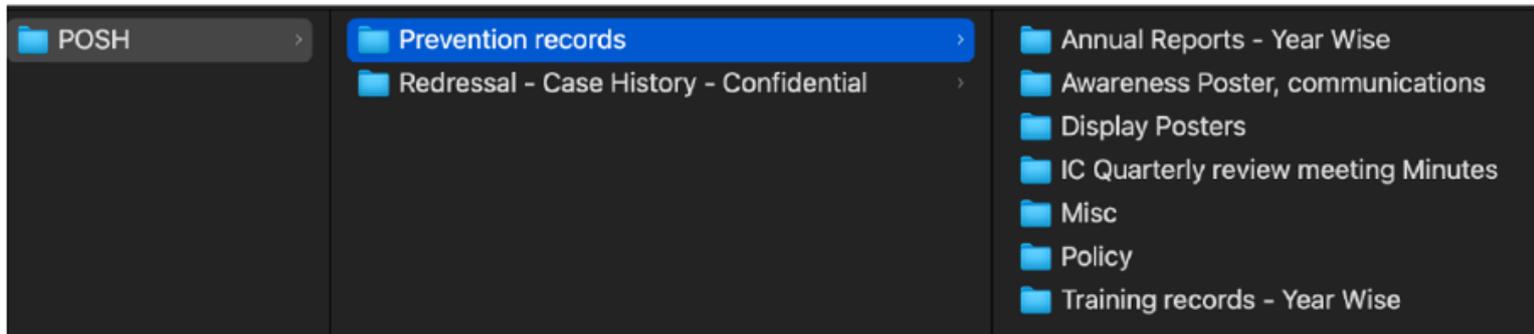
The most secure and efficient method is a hybrid documentation strategy, where:

- Critical case files and signed documents are stored physically for legal compliance.
- Digital backups (encrypted and password-protected) are maintained for operational ease.
- Access logs – both physical and digital – are updated regularly to ensure accountability.

Tip: Annual internal audits should verify both physical and digital recordkeeping practices to ensure PoSH documentation is secure, complete, and compliant with the Act's confidentiality clause (Section 16).

ESSENTIAL DOCUMENTATION CATEGORIES

1. Documentation for Audits: Focus on Prevention



1. Policy Documentation

- Approved POSH Policy signed by Employer with version control.
- Employee acknowledgment records confirming they've read the policy.
- Translations of the policy into local languages, if applicable.

3. Prohibition Records

- Posters displayed in common areas with details of the PoSH policy, IC members, and complaint submission process.
- Emails or memos sent to employees highlighting the organization's zero-tolerance stance on harassment.
- Records of town halls, Q&A sessions, or other awareness initiatives.

5. Quarterly Review Meeting Minutes

- Pictures of meeting in progress
- Agendas of quarterly review meetings.
- Attendance records of IC members.
- Minutes summarising: Number of complaints handled and resolved, trends or recurring issues identified, preventive measures implemented or proposed, training needs for employees or IC members, and reports submitted to management with observations and recommendations.

2. Prevention Records

- Attendance sheets and feedback forms from PoSH awareness sessions.
- Certificates of completion for IC members' training. (e modules)
- Pictures of training materials, such as slides, short videos, or handouts.
- Refresher training schedules and attendance logs.

4. IC Constitution

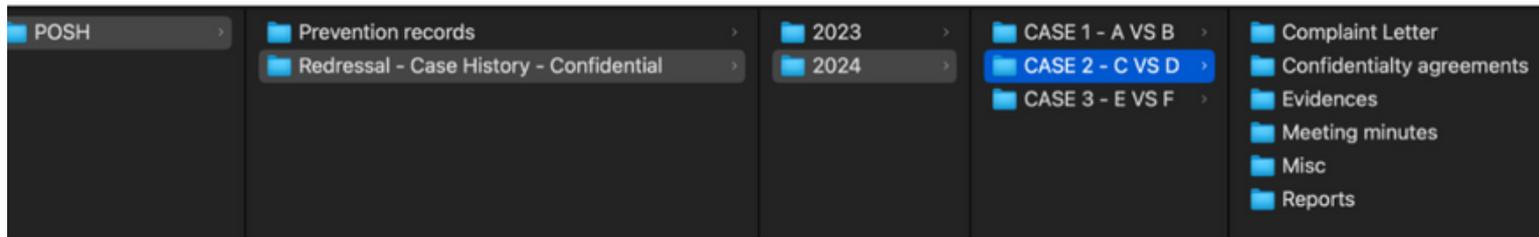
- Appointment letters for IC members, including the external member.
- Signed Non-Disclosure Agreements (NDAs) from IC members to ensure confidentiality.
- Proof of IC training like pictures, short videos, snapshots if online
- Tenure details and conflict-of-interest declarations.

6. Annual Reporting

- Summary of cases and preventive actions.
- Annual report submission to District Officer.
- Record of training sessions and awareness drives.

ESSENTIAL DOCUMENTATION CATEGORIES

2. Redressal and Inquiry Records



1. Complaint Records

- Complaint forms submitted by employees, with timestamps.
- Acknowledgment receipts issued to the complainant.
- Any supporting documents or evidence provided by the complainant.

2. Meeting Minutes

- Detailed minutes from IC meetings discussing the case.
- Attendance records of IC members during these meetings.

3. Inquiry Reports

- Notices issued to the respondent and other involved parties.
- Respondent's response
- Statements recorded during the inquiry process.
- Comprehensive inquiry reports with findings and recommendations.

4. Confidentiality Agreements

- NDAs signed by complainants, respondents, witnesses, and IC members.
- Logs of any confidentiality breaches and the actions taken to address them.

5. Resolution Records

- Final resolution reports shared with complainants and respondents.
- Documentation of disciplinary actions implemented (if applicable).
- Proof of compliance with IC recommendations, such as written apologies etc.

6. Post-Redressal Follow-Ups

- Logs of follow-ups with the complainant to ensure no retaliation occurred.

EXAMPLE: POSH AWARENESS POSTER

ABC Company

POSH



If you experience or witness any unwelcome behaviour—physical, verbal, or non-verbal—report it confidentially to your Internal Committee (IC).

Internal Committee Contacts:

- Presiding Officer
- IC Member 1
- IC Member 2
- External Member – POSH Safe Workplaces

Confidentiality is assured under Section 16 of the POSH Act, 2013.

POSH

OUR NOTE



Our Flagship Programmes

PoSH Pro

End-to-end PoSH Act, 2013 compliance support – from policy drafting to IC training and audits – ensuring safety, dignity, and accountability in every workplace,

Diversity Pro

An immersive DEI capability-building journey – addressing unconscious bias, microaggressions, inclusive recruitment, and intersectional leadership

Aarohi – Women Leadership Program

Empowering women to rise beyond glass ceilings, gender roles, and self-doubt through experiential learning, mentoring, and storytelling

AT POSH SAFE WORKPLACES, WE BELIEVE COMPLIANCE IS MORE THAN DOCUMENTATION—IT REFLECTS AN ORGANISATION'S INTEGRITY, EMPATHY, AND COMMITMENT TO RESPECT. PROPER RECORDKEEPING STRENGTHENS TRUST AND REINFORCES THE CULTURE OF ACCOUNTABILITY THAT EVERY SAFE WORKPLACE DESERVES.

 WWW.POSHSAFEWORKPLACES.IN

 INFO@POSHSAFEWORKPLACES.IN

 +91 88980 61280

CREATING SAFE, INCLUSIVE, AND EMPOWERED WORKPLACES — ONE ORGANISATION AT A TIME

Connect with us

At POSH Safe Workplaces, we're dedicated to helping organisations build cultures of dignity, trust, and accountability.

We are a specialised division of Curious Catalyst, an ISO 9001:2015 certified corporate training and consulting house that partners with leading organisations across India to deliver impactful programmes in POSH, DEI, and Women Leadership Capability Building.

Whether you need expert guidance on policy implementation, IC capacity building, or organisation-wide sensitisation, our team is here to support you every step of the way.

