



Prevention of Sexual Harassment at Workplace (POSH) Policy

Preamble

Shifting Orbits Foundation (SOF) is committed to providing a safe, respectful, and inclusive work environment for all individuals associated with it. SOF has therefore adopted this POSH Policy in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

This policy requires all SOF Associates to maintain the highest standards of dignity, respect, and ethical conduct at the workplace and in all work-related interactions. SOF has a ZERO TOLERANCE approach towards sexual harassment in any form. By adopting this policy, SOF aims to create and nurture a workplace that is free from harassment, intimidation, and exploitation.

Scope

This policy applies to all individuals/organisations associated with SOF in any way, hereinafter referred to as **SOF Associates**, including:

1. **SOF Staff and Consultants** – All those engaged under an employment or consultancy contract with SOF.
2. **SOF Volunteers** – Individuals offering time and services on a voluntary basis without financial benefit.
3. **SOF Partner Staff** – Paid or unpaid individuals working with or supporting SOF under partnership agreements, including interns, donors, sponsors, visitors, or staff of partner organisations.

This policy is binding across all SOF workplaces, offices, learning centres, partner locations, and virtual/online spaces where official SOF activities are conducted.

What Constitutes Sexual Harassment?

As defined under the *POSH Act, 2013*, sexual harassment includes any unwelcome acts or behaviour (whether directly or by implication), such as:

- Physical contact and advances
- 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

This also includes circumstances where:

- Such conduct creates a hostile, intimidating, or offensive work environment.
- Employment, training, promotion, or other professional opportunities are conditioned upon acceptance of sexual advances.

Expected Conduct

Expected Behaviour and Actions	Prohibited Behaviour and Actions
Treat every individual with dignity and respect, irrespective of gender, identity, caste, religion, age, disability, or background.	Any form of sexual harassment as defined in this policy.
Use professional, inclusive, and respectful language and behaviour in all interactions.	Inappropriate jokes, remarks, gestures, or display of offensive material.
Maintain professional boundaries with colleagues, volunteers, students, and partners..	Unwelcome advances, physical contact, or invasion of personal space.
Be mindful of behaviour in both physical and virtual interactions (meetings, emails, messages, social media).	Sharing or showing sexually explicit, offensive, or inappropriate content.
Report incidents of sexual harassment promptly through defined channels.	Retaliation against individuals who raise complaints or participate in inquiries.

Our Guiding principle

SOF's POSH policy is guided by the following principles:

- Safety and dignity of the complainant is paramount.**
- Confidentiality** will be maintained during the entire process.
- Non-retaliation** – No adverse action will be taken against a complainant or witness.
- Fairness** – Both complainant and respondent will have an equal opportunity to be heard.
- Duty of care** – All SOF Associates are responsible for upholding a harassment-free environment.

Internal Complaints Committee (ICC)

SOF shall constitute an **Internal Complaints Committee (ICC)** as per the POSH Act. The ICC will:

- Receive and address complaints of sexual harassment.
- Conduct inquiries in a time-bound, impartial, and confidential manner.
- Recommend appropriate action based on findings.
- Submit annual reports as mandated under the law.

The ICC details will be displayed at all SOF offices and shared with all Associates.

Reporting Violations

- Any SOF Associate may lodge a complaint of sexual harassment by writing to the ICC at posh@shiftingorbits.org.
- Complaints should ideally be raised within 3 months of the incident (as per law), though the ICC may extend this in exceptional circumstances.
- Anonymous complaints will also be reviewed seriously, though the ICC may require further information to proceed.

Responding to violation

- All complaints will be handled sensitively and promptly, with no bias.
- The ICC will ensure a fair inquiry process in line with natural justice.
- Disciplinary action may range from warning, suspension, termination, or legal recourse depending on severity.
- SOF will cooperate fully with external legal authorities if required.

As prescribed by law, the institutions, programs or other initiatives of the SOF will fully cooperate with legal authorities in case of any allegation of violation of the POSH policy.

Awareness and Training

SOF is committed to building awareness about POSH by:

- Conducting regular training and orientation programs for staff, volunteers, and partners.
- Displaying this policy prominently at all work locations and sharing it with all Associates.
- Promoting a culture of respect, inclusivity, and open communication.

Online Conduct Guidelines

With increased use of digital platforms for communication, collaboration, and learning, SOF recognizes the need for professional standards of conduct in online spaces. These guidelines are an extension of the POSH Policy to ensure safety and respect in virtual interactions.

Guidelines for SOF associated

1. Continue to follow the Code of Conduct and POSH Policy in all online communications (emails, WhatsApp, Zoom, Teams, etc.).
2. Maintain professionalism in language, tone, dress, and background during video calls.
3. Avoid using personal social media platforms (Instagram, Snapchat, TikTok, etc.) for official SOF communication with colleagues, volunteers, or students.
4. Do not share or forward inappropriate content (sexually explicit, offensive, or discriminatory) in any SOF group or forum.
5. Respect personal boundaries – avoid late-night or non-essential messages unless pre-agreed.
6. Keep all personal information of colleagues, students, or associates confidential.
7. Obtain consent before sharing images, recordings, or messages involving others.
8. Immediately report any form of online harassment or inappropriate behaviour through the reporting channel.

If you suspect or have noticed signs of any of the above risks, or have seen/heard about violation(s) of the guidelines, please inform immediately via email to posh@shiftingorbits.org

Self Declaration

I have read and understood the POSH Policy of Shifting Orbits Foundation and undertake to abide by it under all circumstances.

Name	
Signature	
Signing Date	