**POSH Policy Template**

Prevention of Sexual Harassment at Workplace | Compliant with the POSH Act, 2013

# **1. Purpose**

The purpose of this policy is to ensure a safe and secure working environment for all employees, particularly women, by preventing, prohibiting, and redressing incidents of sexual harassment at the workplace in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**.

# **2. Scope**

This policy applies to all employees (permanent, temporary, contractual, interns), clients, vendors, and visitors at all locations of the organization, including remote and hybrid work setups.

# **3. Definition of Sexual Harassment**

Sexual harassment includes any one or more of the following unwelcome acts or behavior:

* Physical contact and advances
* Demand or request for sexual favors
* Making sexually colored remarks
* Showing pornography
* Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

# **4. Internal Committee (IC)**

The organization shall constitute an Internal Committee (IC) at each office or branch where there are **10 or more employees**.

The IC shall comprise:

* A Presiding Officer (senior woman employee)
* At least two employees committed to women’s cause or with legal knowledge
* One external member from an NGO or legal background
* The term of IC members shall be **3 years**.

# **5. Complaint Filing Procedure**

* An aggrieved woman can file a **written complaint** with the IC within **3 months** from the date of the incident.
* In the case of multiple incidents or valid reasons, the timeline may be extended by another **3 months**.

# **6. Inquiry Process**

* The IC shall initiate an inquiry **within 7 days** of receiving the complaint.
* Both parties will be given a **fair opportunity to be heard**.
* The inquiry must be completed within **90 days**.
* A final report must be submitted to the employer **within 10 days** of completion.
* The employer must act on the recommendation **within 60 days**.

# **7. Interim Relief**

During the inquiry, the IC may recommend interim measures such as:

* Transfer of the complainant or respondent
* Grant of up to **3 months leave** to the complainant
* Other appropriate relief measures

# **8. False or Malicious Complaints**

If the IC concludes that a complaint was made with malicious intent or supported by false evidence, disciplinary action may be taken against the complainant. However, inability to prove the complaint will not attract action unless it is shown to be deliberately false.

# **9. Confidentiality**

The identity of the complainant, respondent, witnesses, and all details of the complaint and inquiry will be kept **strictly confidential**.
Breach of confidentiality by any party involved may attract disciplinary action.

# **10. Awareness & Training**

The organization shall:

* Conduct **POSH awareness sessions** regularly
* Display policy posters at workplace premises
* Train Internal Committee members
* Include POSH orientation during onboarding

# **11. Legal Compliance**

This policy is aligned with the **POSH Act, 2013**.
The employer is responsible for:

* Annual filing of compliance reports with the District Officer
* Ensuring timely constitution of IC
* Supporting awareness initiatives

# **12. Policy Review**

This policy shall be reviewed **annually** and updated as needed to reflect changes in legislation or organizational practices.