



POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE (POSH POLICY)

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1. INTRODUCTION

Khaitan Public School is committed to providing a safe, respectful, inclusive and dignified workplace for every employee. The school believes that every individual has the right to work in an environment free from sexual harassment, intimidation, discrimination and victimisation.

The school promotes a culture based on mutual respect, professionalism, equality and integrity. Every employee is expected to contribute towards creating a positive work environment where people are treated with dignity regardless of gender, age, religion, disability, caste, race or marital status.

Sexual harassment violates the fundamental rights of an individual and adversely affects personal dignity, professional growth and workplace well-being. The school therefore adopts a zero-tolerance approach towards any form of sexual harassment.

This Policy has been framed in accordance with:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;
- Sexual Harassment of Women at Workplace Rules, 2013;

While this Policy has been framed under the provisions of the POSH Act for the protection of women employees, Khaitan Public School is committed to maintaining a workplace free from harassment for every employee. Complaints by employees not covered under the POSH Act shall be dealt with under the applicable service rules, code of conduct and disciplinary procedures of the school.

Where any provision of this Policy differs from the provisions of the POSH Act or any subsequent amendment, the provisions of the law shall prevail.

2. PURPOSE

The objectives of this Policy are to:

- Prevent sexual harassment at the workplace.
- Create a safe, respectful and inclusive work environment.
- Encourage employees to report incidents without fear.
- Ensure fair, timely and confidential redressal of complaints.
- Protect complainants, witnesses and members of the Internal Complaints Committee from retaliation.
- Promote awareness regarding acceptable workplace behaviour.
- Ensure compliance with all statutory obligations under the POSH Act.

3. SCOPE OF THE POLICY

This Policy applies to every person associated with Khaitan Public School irrespective of employment status.

It covers:

- Permanent employees
- Probationers
- Temporary employees
- Contractual employees
- Consultants
- Interns
- Visiting faculty
- Coaches
- Administrative staff
- Transport staff
- Housekeeping staff
- Security personnel
- Vendors and service providers working within the school premises
- Any woman visiting the school in connection with official work

The Policy applies to conduct occurring:

- within the school campus;
- during school events;
- educational tours;

- excursions;
- competitions;
- sports meet;
- training programs;
- workshops;
- conferences;
- meetings;
- school transport;
- official accommodation;
- employer-provided transportation;
- off-site programs organized by the school;
- online meetings;
- virtual classrooms involving employees;
- official WhatsApp groups;
- emails;
- social media interactions connected with work; and

4. DEFINITIONS

4.1 Aggrieved Woman

An Aggrieved Woman means a woman of any age, whether employed by the school or not, who alleges that she has been subjected to sexual harassment at the workplace.

This includes permanent employees, contractual employees, consultants, interns and visitors.

4.2 Employee

Employee means any person employed by the school on a regular, temporary, contractual, probationary, daily wage, voluntary or honorary basis, directly or through an agency.

4.3 Employer

Employer refers to the Management of Khaitan Public School or any person authorised to discharge employer responsibilities under the POSH Act.

4.4 Respondent

Respondent means the person against whom a complaint of sexual harassment has been made.

4.5 Internal Complaints Committee (ICC)

Internal Complaints Committee means the Committee constituted by the School under Section 4 of the POSH Act for receiving, investigating and recommending action on complaints of sexual harassment.

4.6 Workplace

For the purpose of this Policy, workplace includes:

- School campus
- Administrative offices
- Classrooms
- Laboratories
- Libraries
- Sports facilities
- School buses and transport
- Off-site programs
- Educational trips
- Conferences
- Training programmes
- Virtual workplace
- Online meetings
- Emails
- Official messaging groups

4.7 Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour of a sexual nature, whether directly or indirectly.

This includes but is not limited to:

- Physical contact or advances.
- Unwelcome touching.
- Requests or demands for sexual favours.
- Sexually coloured remarks.
- Lewd jokes.
- Sexually suggestive comments.
- Displaying sexually explicit material.
- Showing pornography.

- Sharing obscene photographs or videos.
- Repeated unwelcome invitations.
- Sending inappropriate gifts.
- Making comments about appearance in a sexual manner.
- Persistent unwelcome communication.
- Any verbal, non-verbal or physical conduct of a sexual nature.

4.8 Online or Digital Sexual Harassment

Sexual harassment may also occur through electronic or digital platforms.

Examples include:

- Sending sexually explicit emails.
- Inappropriate WhatsApp messages.
- Sharing obscene images or videos.
- Posting offensive content on social media.
- Cyber stalking.
- Unwanted video calls.
- Recording meetings without consent.
- Sharing edited photographs.
- Online bullying of a sexual nature.
- Repeated unwanted digital communication.
- Misuse of school communication platforms.

Digital misconduct connected with employment shall be treated at par with physical workplace harassment.

4.9 Circumstances that may amount to Sexual Harassment

The following circumstances, among others, may constitute sexual harassment:

- Promise of favourable treatment in employment.
- Threat of adverse employment consequences.
- Threat regarding promotion or appraisal.
- Humiliating treatment.
- Creating an intimidating or hostile work environment.
- Interference with work performance.
- Conduct affecting physical or mental well-being.
- Conduct affecting dignity and safety.

5. EMPLOYER RESPONSIBILITIES

Khaitan Public School recognises that prevention of sexual harassment is a shared responsibility led by the Employer.

The school shall:

- Provide a workplace free from sexual harassment.
- Constitute and maintain an Internal Complaints Committee in accordance with the POSH Act.
- Display details of the POSH Policy and ICC at prominent locations.
- Conduct mandatory POSH awareness programs every year.
- Conduct orientation programs for all new employees.
- Arrange specialised training for ICC members.
- Provide necessary facilities for conducting inquiries.
- Ensure timely implementation of ICC recommendations.
- Maintain confidentiality of all proceedings.
- Extend necessary support during investigations.
- Ensure that no employee is subjected to retaliation for reporting concerns.
- Review this Policy periodically.
- Maintain records as prescribed under law.
- Submit statutory reports wherever required.
- The latest approved and signed POSH Policy together with the names, designations and contact details of ICC members shall be published on the school website and updated immediately after any change in committee composition.

6. ROLES AND RESPONSIBILITIES

6.1 Responsibilities of Every Employee

Every employee shall:

- Treat colleagues with dignity and respect.
- Maintain professional behaviour at all times.
- Avoid any conduct that may amount to sexual harassment.
- Respect personal boundaries.
- Participate in mandatory POSH awareness programs.
- Cooperate with inquiries whenever required.
- Maintain confidentiality during complaint proceedings.
- Report incidents of harassment promptly.
- Support colleagues experiencing harassment.

Employees are encouraged to communicate respectfully if any behaviour makes them uncomfortable.

6.2 Responsibilities of Heads of School /Department / Reporting Managers

Heads of Department, Coordinators, Supervisors and Managers shall:

- Promote a respectful workplace culture.
- Ensure that employees understand the Policy.
- Take all complaints seriously.
- Immediately report complaints to the ICC.
- Prevent victimisation or retaliation.
- Cooperate fully during inquiries.
- Maintain confidentiality.
- Encourage participation in awareness programmes.
- Ensure appropriate workplace behaviour within their teams.

6.3 Responsibilities of the People & Culture / HR Department

The HR Department shall:

- Coordinate implementation of this Policy.
- Organise annual awareness programmes.
- Maintain policy records.
- Coordinate with the ICC.
- Ensure induction training for new employees.
- Facilitate counselling and support services where required.
- Assist the Employer in statutory compliance.

7. PREVENTION AND AWARENESS

The school believes that prevention is the most effective way to eliminate workplace harassment.

Accordingly, the School shall:

- Conduct mandatory annual POSH awareness training for all employees.
- Provide POSH orientation during employee induction.
- Organise periodic refresher programs.
- Conduct specialised training for ICC members.
- Display awareness material at prominent locations.
- Include behavioural expectations in staff handbooks.
- Promote respectful digital communication.
- Encourage employees to report concerns without fear.

All employees are expected to actively participate in these programmes and comply with the standards of professional conduct laid down by the school.

The school shall display POSH awareness posters at prominent locations and make printed brochures available explaining sexual harassment, complaint procedures and ICC contact details.

8. INTERNAL COMPLAINTS COMMITTEE (ICC)

In accordance with Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Khaitan Public School shall constitute an Internal Complaints Committee (ICC) to receive and redress complaints of sexual harassment.

8.1 Composition of the ICC

The Internal Complaints Committee consists of:

- **Presiding Officer:** Ms. Mamta Kapoor (Executive Director Education)
- **Employee Members:** Ms. Charu Sakhuja (Director HR),
Ms. Aparajita Roy (Vice Principal)
Ms. Karishma Sharma (Behavioural Counsellor)
Mr. Anand Kumar (Principal)
- **External Member:** *Ms. Gagandeep Kaur* (Clinical Psychologist)
- At least **50% of the members shall be women.**
- The Committee shall consist of a **minimum of four members.**

The names and contact details of the ICC members shall be displayed the school official communication platforms.

8.2 Tenure of the Committee

The members of the Internal Complaints Committee shall hold office for a period not exceeding **three years**, as prescribed under the Act.

The School Management reserves the right to reconstitute the Committee whenever required due to resignation, transfer, retirement or any other administrative reason.

8.3 Functions of the ICC

The Internal Complaints Committee shall:

- Receive complaints of sexual harassment.
- Acknowledge receipt of complaints promptly.
- Assist the complainant in filing a written complaint, wherever required.

- Conduct inquiries fairly and impartially.
- Recommend interim relief, wherever necessary.
- Submit inquiry reports with recommendations.
- Maintain complete confidentiality.
- Maintain records of complaints and inquiries.
- Submit annual reports as prescribed under law.

9. REPORTING A COMPLAINT

Khaitan Public School encourages employees to report incidents of sexual harassment without fear of retaliation.

Complaints may be made through any of the following channels:

- Directly to any member of the Internal Complaints Committee.
- Through the Presiding Officer of the ICC.
- Through the People & Culture / Human Resources Department.
- Through the official POSH email address of the school.
- Through a written complaint submitted in a sealed envelope addressed to the Presiding Officer.
- Through any other reporting mechanism notified by the school from time to time.

10. ACKNOWLEDGEMENT OF COMPLAINT

Upon receiving a complaint, the Internal Complaints Committee shall:

- Acknowledge receipt of the complaint within **three working days**.
- Explain the inquiry process to the complainant.
- Inform the complainant of available support services.
- Inform the complainant about the option of conciliation, where applicable.
- Maintain complete confidentiality throughout the process.

11. LODGING A COMPLAINT

The complainant should submit a written complaint containing:

- Name of the respondent (against whom the complaint is made).
- Date(s) and place(s) of the incident.
- Description of the incident(s).
- Supporting documents, if available.
- Names of witnesses, if any.

The complaint should ordinarily be submitted within **three months** from the date of the incident or the last incident.

Where sufficient reasons exist, the ICC may extend the time limit by another **three months**, after recording reasons in writing.

12. SUPPORT SERVICES

The school recognizes that reporting sexual harassment may be emotionally challenging.

Where required, the school may facilitate:

- Professional counselling.
- Emotional support.
- Medical assistance.
- Reasonable workplace adjustments during the inquiry.
- Referral to external support agencies where appropriate.

Providing such support shall not affect the impartiality of the inquiry.

13. RESOLUTION THROUGH CONCILIATION

Before initiating a formal inquiry, the complainant may request the Internal Complaints Committee to attempt resolution through conciliation.

The Committee shall ensure that:

- Conciliation is entirely voluntary.
- No monetary settlement forms the basis of conciliation.
- Both parties understand the agreed terms.
- The settlement is recorded in writing.
- Copies of the settlement are provided to both parties.

Once a settlement has been reached and implemented, no further inquiry shall be conducted unless the respondent fails to comply with the agreed terms.

14. FORMAL INQUIRY

The Internal Complaints Committee shall initiate a formal inquiry when:

- The complainant does not request conciliation.
- Conciliation does not result in a settlement.
- The respondent violates the terms of the conciliation settlement.

The inquiry shall commence within **one week** of receipt of the complaint or closure of conciliation proceedings.

15. INQUIRY PROCEDURE

The Internal Complaints Committee shall follow the procedure below:

Step 1

A copy of the complaint shall be provided to the respondent within **seven working days**.

Step 2

The respondent shall submit a written response together with supporting documents and witness details within **ten working days**.

Step 3

Separate hearings shall be conducted with:

- the complainant;
- the respondent; and
- witnesses, wherever required.

Step 4

Both parties shall be given reasonable opportunity to:

- present evidence;
- submit documents;
- produce witnesses;
- respond to allegations.

Step 5

The Committee may examine:

- emails;
- messages;
- photographs;
- CCTV footage;
- electronic records;
- attendance records; or
- any other relevant evidence.

Step 6

Proceedings shall be recorded in writing.

Copies of signed statements shall form part of the inquiry record.

Step 7

If either party repeatedly fails to appear without sufficient cause despite three written notices, the Committee may proceed **ex parte** and complete the inquiry on the basis of available evidence.

16. INTERIM RELIEF

During the pendency of the inquiry, the complainant may submit a written request seeking interim relief.

Depending upon the circumstances, the Committee may recommend to the Employer:

- transfer of either party;
- temporary change in reporting arrangements;
- grant of leave up to **three months** in addition to entitled leave;
- temporary work-from-home, where feasible;
- restriction on direct interaction between parties;
- withholding performance evaluation by the respondent;
- any other appropriate measure to ensure safety and fairness.

Such recommendations shall not be construed as disciplinary action.

17. COMPLETION OF INQUIRY

The Internal Complaints Committee shall endeavour to complete the inquiry within **90 days** from the date of receipt of the complaint.

The Committee shall maintain detailed records of all proceedings throughout the inquiry.

18. INQUIRY REPORT

Upon completion of the inquiry, the Internal Complaints Committee (ICC) shall prepare a written report based on the evidence presented during the proceedings.

The report shall contain:

- Brief background of the complaint.
- Summary of allegations.
- Response submitted by the respondent.
- Evidence examined.
- Witness statements, wherever applicable.
- Findings of the Committee.

- Reasons supporting the findings.
- Recommendations for action.

The inquiry report shall be completed within **10 days** of conclusion of the inquiry and submitted to the Employer.

Copies of the report shall be made available to both the complainant and the respondent in accordance with the provisions of the POSH Act.

19. ACTION ON THE RECOMMENDATIONS

The Employer shall implement the recommendations of the ICC within **60 days** from the date of receipt of the inquiry report.

Appropriate disciplinary action shall depend upon the nature and seriousness of the misconduct.

Possible actions include:

- Formal counselling.
- Written apology.
- Written warning.
- Censure or reprimand.
- Mandatory behavioural counselling or professional training.
- Withholding promotion.
- Suspension from duty.
- Transfer to another department or location.
- Termination of employment or contract.
- Any other disciplinary action permitted under the applicable Service Rules.

The disciplinary action shall be proportionate to the gravity of the misconduct.

20. FALSE OR MALICIOUS COMPLAINTS

The school recognizes that genuine complaints may sometimes remain unsubstantiated due to lack of evidence.

Therefore:

- Mere inability to prove a complaint shall **not** amount to a false or malicious complaint.
- Mere acquittal of the respondent shall **not** automatically establish malicious intent.

Where the ICC concludes that:

- the complaint was deliberately false; or

- forged or misleading documents were intentionally produced; or
- the complaint was filed with malicious intent,

the Committee may recommend disciplinary action against the person responsible.

Such a recommendation will be made only after a separate review of the case and after recording the reasons in writing.

21. PROTECTION AGAINST RETALIATION

Khaitan Public School strictly prohibits retaliation against any individual who:

- files a complaint;
- participates in an inquiry;
- appears as a witness;
- provides information to the ICC; or
- supports a complainant in good faith.

Retaliation includes but is not limited to:

- intimidation;
- threats;
- victimization;
- unfair transfers;
- denial of promotion;
- unfair performance appraisal;
- reduction of responsibilities;
- exclusion from official activities;
- hostile behaviour;
- spreading rumours;
- online harassment following a complaint.

Any act of retaliation shall itself constitute misconduct and may invite disciplinary action independent of the original complaint.

22. CONFIDENTIALITY

The school shall maintain strict confidentiality throughout the complaint and inquiry process.

The following information shall not be disclosed except as permitted by law:

- Identity of the complainant.
- Identity of the respondent.
- Identity of witnesses.

- Contents of the complaint.
- Evidence produced.
- Inquiry proceedings.
- Recommendations of the ICC.
- Employer's action taken.

Any breach of confidentiality by employees or Committee members may result in disciplinary action under the applicable rules.

23. RECORD RETENTION

The school shall maintain secure records relating to complaints of sexual harassment.

Records shall include:

- Original complaint.
- Correspondence.
- Evidence submitted.
- Minutes of hearings.
- Witness statements.
- Inquiry reports.
- Recommendations.
- Employer's action taken.
- Appeal records, if any.

These records shall:

- be maintained in secure physical or digital form;
- be accessible only to authorized persons;
- be retained for **a minimum period of seven years** or such longer period as required under applicable law or ongoing legal proceedings.

The school shall ensure compliance with applicable data protection and privacy requirements.

24. ANNUAL AWARENESS AND CAPACITY BUILDING

The school shall organize awareness programs at least once every year covering:

- provisions of the POSH Act;
- acceptable workplace behaviour;
- respectful communication;

- prevention of online harassment;
- complaint procedures;
- rights and responsibilities of employees.

Specialized training shall also be organized periodically for:

- Internal Complaints Committee members;
- Heads of Departments;
- Supervisors;
- Human Resources personnel.

Attendance in mandatory POSH training programs shall be recorded through signed attendance sheets or digital attendance records. Copies of training material, presentations, photographs (where appropriate) and attendance records shall be maintained by HR for audit purposes.

25. POLICY REVIEW

This Policy shall be reviewed:

- once every year or;
- whenever there is any amendment in the POSH Act or related rules;
- whenever required due to organizational changes;

Any amendments shall become effective only after approval by the competent authority.

The latest approved version shall be circulated to all employees.

26. ICC MEETING

The ICC shall meet at least once every quarter, even if no complaints are received. Minutes of every meeting shall be recorded, signed by members present and maintained confidentially.

27. QUARTERLY COMPLIANCE REPORT

The ICC shall submit a quarterly compliance note to the School Management covering:

- complaints received (if any)
- awareness programmes conducted
- preventive measures taken
- pending actions

- recommendations for improvement

28. ANNUAL REPORTING

The Internal Complaints Committee shall prepare an Annual Report containing details prescribed under the POSH Act, including:

- Number of complaints received.
- Number of complaints disposed of.
- Number of pending complaints.
- Nature of awareness programs conducted.
- Recommendations made to the Employer.
- Compliance status.

The report shall be submitted to the Employer and the appropriate authority as required under law.

29. CONTACT DETAILS

The school shall notify employees separately regarding:

- Names of ICC Members.
- Contact numbers.
- Official POSH email address.

The contact details shall be updated whenever there is a change in the composition of the Committee.

Khaitan Public School is committed to maintaining a workplace that is safe, respectful, inclusive and free from sexual harassment.

Every employee, irrespective of role or designation, is expected to uphold the values of dignity, equality and mutual respect and contribute towards creating a positive and secure work environment.

Any violation of this Policy shall be dealt with promptly, fairly and in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the applicable Service Rules of the School.