

# Policy on Prevention of Sexual Harassment

## PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE POLICY

### AT SARANAM INDIA (an initiative of The Sheltr Foundation)

**Objective:** saranam is committed to providing a safe and healthy work environment and does not permit any form of sexual harassment in the workplace. saranam and everyone working with the Foundation have a shared responsibility in contributing to a respectful work environment. In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act), saranam has provided a framework to specifically deal with acts of sexual harassment at the workplace. While the POSH Act is only intended to protect women; but this policy is intended to be gender neutral and will apply to in case of sexual harassment of any person, irrespective of the gender.

**Scope and Applicability:** This policy is applicable to all 'Resources' of saranam, which for the purpose of this policy shall include all Partners, Professionals, Staff and other permanent, contractual, temporary employees, trainees, volunteers, consultants or interns working at saranam. The Foundation will not tolerate any form of sexual harassment, if engaged in by its Resources. This policy is applicable not only on saranam premises, but also in instances where the Resources have occasion to interact on work (e.g. in vehicles, third party premises, off site meetings, schools and public venues).

**What Constitutes Sexual Harassment:** Sexual harassment includes any one or more of the following acts or behaviour (whether directly or by implication):

- (a) Physical contact or advances;
- (b) A demand or request for sexual favours;
- (c) Sexually coloured remarks;
- (d) Showing pornography; or
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Examples of sexual harassment include but are not limited to:

- **Verbal:** Repeated requests for dates, sexual innuendos, sexual epithets, derogatory slurs, foul or obscene language, inappropriate jokes/propositions, questions about another's sexual experiences, or sexually suggestive or insulting remarks or sounds;  
Visual/Non-verbal: Inappropriate written materials (including email and online content), derogatory posters, cartoons or drawings, suggestive objects or pictures, graphic commentaries, leering, or obscene gestures; and
- **Physical:** Assault of a sexual nature, such as rape, molestation or attempts to commit these assaults. Any other physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another's body.  
If any of the following circumstances exist in relation to or connected with any act or behaviour of sexual harassment (as set out above), such conduct would amount to sexual harassment at the workplace:
  - (a) Implied or explicit promise of preferential treatment at work;
  - (b) Implied or explicit threat of detrimental treatment at work;
  - (c) Implied or explicit threat about present or future employment/engagement status;
  - (d) Interference with work or creating intimidating or offensive or hostile working environment; or
  - (e) Humiliating treatment likely to affect a Resource's health or safety.

**The Internal Committee:** An Internal Committee has been constituted. The names and contact details of the members of the Internal Committee are set out in the Annexure. The Management shall have the right and absolute discretion to remove or replace any member of the Internal Committee, if it believes this is necessary or appropriate.

**Reporting a Complaint:** Any person who has been subject to sexual harassment (Complainant) must make a written complaint to the Management or to any member of the Internal Committee within 90 days of the incident of sexual harassment, or, if in a series of incidents, at the earliest (and in any case within 90 days) after the last incident of sexual harassment.

Once a complaint is received, the Internal Committee will initiate an inquiry in accordance with applicable law. During the pendency of the inquiry, the Internal Committee may, at its discretion, recommend any interim measures as it deems necessary (including a recommendation that the accused be placed on suspension, with or without pay).

The Internal Committee will submit its report and recommendations to the CEO within a reasonable time frame.

**Disciplinary Action:** In the event a Resource is found to be guilty of sexual harassment, or of filing a false and malicious complaint, or giving false evidence during the inquiry, he/she will be subject to disciplinary action as recommended by the Internal Committee. Such disciplinary action may include, training/counselling, written or verbal warning, withholding bonus, suspension of services without pay, termination of the services with saranam or such other action as the Internal Committee may deem appropriate.

**Third Party Harassment:** If any Resource has been subject to sexual harassment during the course of work for the Foundation by any third party, including visitors, clients, etc., the Foundation will take appropriate remedial measures, including, assisting the Resource to raise a complaint with the accused's employer and/or to file a police complaint against the accused, as per applicable laws.

### Resources' Responsibilities

(a) All Resources must read and abide by the Policy, attend training and speak to the Management or the Internal Committee, when they have questions.

(b) Everyone is responsible for reporting concerns about sexual harassment in a timely fashion. Any Resource who becomes aware of possible sexual harassment of another person must encourage the harassed party to inform the Internal Committee. Please note that a formal complaint and the related process will commence only when the complaint is filed with the Internal Committee by the aggrieved person or the aggrieved person has provided his/her consent to initiate a formal investigation.

(c) saranam respects the privacy of all Resources. Accordingly, complaints of sexual harassment and any resolution of the same will be kept confidential, to the extent possible. Violations of confidentiality can result in disciplinary action, up to and including termination.

(d) saranam also prohibits retaliation against anyone for making a good faith report regarding sexual harassment, assisting in making a sexual harassment complaint, or cooperating in a sexual harassment inquiry. Anyone found guilty of retaliatory behaviour will be subject to disciplinary action, up to and including termination.

### Members of the Internal Committee

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