

Letter No: ARKS/PMU/24-25/16

Date: 18.11.2025

To,
The Authority Engineer,
Provincial Division
PWD, Pauri Uttarakhand

LOA No.- LOA NO: 417/15/BR/RFB-EPC/UGRIDP/2023

Reference: (Construction of 150M Span Intermediate Lane Motor Bridge & its approach over Nayar River for Badkholu village in District Pauri, Uttarakhand State)

Subject: Submission of Social & Environmental Plans.

Dear sir,

With reference to the above-mentioned work, we hereby submit the Environmental and Social Plans in compliance with the contractual requirements, for your kind review and approval. The details of the reports are as follows:

S. No.	File No.	Description
1	File no.1	Social Management Plan (C-SMP)
2	File no.2	Environmental Management Plan (C-EMP)
3	File no.3	Emergency Response Preparedness Plan (ERPP).
4	File no.4	Labour Management Plan (LMP)
5	File no.5	Occupational Health and Safety (OHS) Plan
6	File no.6	Sexual Harassment Prevention & Redressal Plan
7	File no.7	Stakeholder Management Plan
8	File no.8	Waste Management Plan (WMP)

This is submitted for your kind information and necessary action.

Best Regards

M/s ARKS Universal Pvt. Ltd.



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ARKS UNIVERSAL PVT.LTD.
 (Authorised Signatory)

Encl: Senior Environment and Social expert, PIU (PWD) U-PREPARE Uttarakhand.

SEXUAL HARASSMENT PREVENTION & REDRESSAL PLAN

Project Title: Construction of 150 m Span Intermediate Lane Motor Bridge & Its Approach over Nayar River for Badkholu Village, District Pauri, Uttarakhand.

Prepared by: Priyanka Rawat (Social Expert / Labour Specialist)

Project Location: Badkholu, District Pauri Garhwal, Uttarakhand

1. INTRODUCTION

The proposed project — *Construction of 150 m Span Intermediate Lane Motor Bridge & its approach over the Nayar River* — involves a multi-disciplinary workforce engaged in design, construction, and supervision activities in a rural and geotechnically sensitive area of Uttarakhand. The construction workforce consists of engineers, consultants, contractors, skilled and unskilled labourers, drivers, and administrative staff, including both male and female personnel.

Given the mixed-gender work environment and remote project location, it is essential to establish a **robust institutional framework** to ensure a safe, respectful, and inclusive workplace that is **free from sexual harassment, gender discrimination, and workplace violence**.

This plan forms an integral component of the **Health, Safety, Environment, and Social (HSES) Management System** of the project, ensuring compliance with national legislation, MoRTH guidelines, and the Environmental and Social Management Framework (ESMF) under which this project operates.

Purpose of the Plan

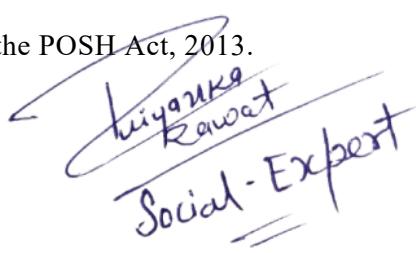
- To define and implement preventive, control, and redressal measures against any act of sexual harassment at workplace.
- To institutionalize mechanisms for timely, fair, and confidential handling of complaints.
- To promote gender equity, dignity, and respect in all project-related environments — worksites, offices, and labour camps.

2. OBJECTIVES

The primary objectives of this plan are as follows:

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1. To establish an Internal Complaints Committee (ICC) as per the POSH Act, 2013.

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Social-Expert

2. To ensure that all **workers and staff are aware** of what constitutes sexual harassment and the mechanisms available to address it.
 3. To integrate **gender-based risk management** into the project's HSES framework.
 4. To provide **gender-sensitive facilities** such as safe toilets, rest areas, and accommodation for women.
 5. To ensure **transparency, confidentiality, and non-retaliation** in all grievance handling processes.
 6. To generate **periodic compliance reports** for monitoring by the Project Implementation Unit (PIU), Social Development Specialist, and Labour Department.
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3. APPLICABLE LEGAL & REGULATORY FRAMEWORK.

This plan is prepared in accordance with the following national and international frameworks:

Sr. No.	Regulation / Framework	Key Relevance
1	<i>The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013</i>	Primary legislation defining employer's duties, complaint mechanism, and ICC structure.
2	<i>Rules, 2013 (Notified under POSH Act)</i>	Specifies inquiry procedures and confidentiality norms.
3	<i>Indian Penal Code (Sections 354, 354A, 509)</i>	Defines and penalizes acts of harassment, assault, or insult to modesty.
4	<i>Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996</i>	Mandates welfare, safety, and dignity of construction workers.
5	<i>ILO Convention No. 190 (2019)</i>	Global standard for elimination of violence and harassment at work.
6	<i>MoRTH Guidelines & ESMF Provisions</i>	Requires integration of gender and social safeguards in all road and bridge projects.



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4. DEFINITION OF SEXUAL HARASSMENT.

As per **Section 2(n)** of the POSH Act, 2013, sexual harassment includes any unwelcome act or behaviour (direct or implied) such as:

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

Additionally, harassment may manifest in multiple forms, including:

- **Verbal:** Lewd jokes, comments, or remarks with sexual undertones.
- **Non-verbal:** Staring, gestures, or display of offensive material.
- **Digital:** Circulating indecent or suggestive content through social media or phones.
- **Quid-pro-quo:** Demanding sexual favors in exchange for professional advancement.
- **Hostile Work Environment:** Creating an intimidating, offensive, or oppressive atmosphere.

5. SCOPE OF APPLICATION.

This plan applies to **all individuals associated with the project**, including:

- Employer, consultants, engineers, supervisors, and administrative staff.
- Contractors, subcontractors, vendors, and suppliers.
- Skilled, semi-skilled, and unskilled laborers, including migrant workers.
- Any person visiting or engaged in project-related activities, either directly or indirectly.

The policy is applicable across:

1. **Construction Sites** – Bridge and approach work.
2. **Project Offices** – Design, administrative, and management locations.
3. **Labor Camps & Facilities** – Including accommodation, kitchens, toilets, and recreation areas.



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4. **Transport & Logistics Operations** – During material movement or site visits.
 5. **Community Interactions** – When engaging with local communities or service providers.
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6. PREVENTIVE AND CONTROL MEASURES

6.1 Policy Communication

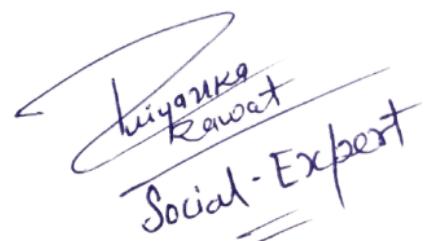
- A **Zero Tolerance POSH Policy** shall be displayed at all entry points, work areas, and camp premises in Hindi and English.
- A copy of this policy shall be included in **employment contracts, contractor agreements, and tender documents**.
- The Social Expert shall conduct **periodic orientation sessions** to communicate these policies to all workers.

6.2 Infrastructure and Safety Provisions

- Separate and lockable toilet facilities for male and female workers.
- Adequate lighting in work zones, walkways, and camps to prevent unsafe conditions.
- Secure boundary fencing and controlled entry/exit to female accommodation zones.
- Designated complaint boxes installed at accessible and discreet locations.

6.3 Training, Awareness & Capacity Building

- **Induction Training:** Every new worker and staff shall undergo POSH orientation within 48 hours of joining.
 - **Toolbox Talks:** Weekly 10-minute discussions on workplace respect and behavioural expectations.
 - **Quarterly Workshops:** Organized for ICC members, supervisors, and managers in association with NGOs or legal experts.
 - **Information, Education & Communication (IEC):** Posters, leaflets, and signage displayed prominently.
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7. INSTITUTIONAL FRAMEWORK.

7.1 Internal Complaints Committee (ICC)

As per Section 4 of the POSH Act, the project will establish a functional ICC with gender-balanced representation.

Position	Designation	Key Responsibility
Presiding Officer	Senior Female Officer	Lead all inquiries and hearings
Member 1	Site Engineer / Staff	Investigation & record maintenance
Member 2	Labour Welfare Officer	Representation of worker interests
External Member	NGO / Legal Expert	Neutral oversight and legal compliance

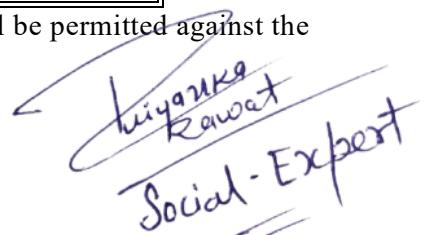
Functions of ICC:

- Receive and record complaints in writing.
- Conduct impartial investigation and maintain confidentiality.
- Recommend disciplinary or corrective action within prescribed timelines.
- Submit quarterly and annual summary reports to the Project Manager.

7.2 Grievance Redressal Process

Step	Action	Time Frame
1	Submission of complaint (written or oral) to ICC	Within 3 months of incident
2	Acknowledgment of receipt by ICC	Within 7 days
3	Formal inquiry and hearing	Within 90 days
4	Submission of recommendations	Within 10 days after inquiry
5	Implementation by Employer	Within 60 days of receipt

Confidentiality shall be maintained at all stages, and no retaliation shall be permitted against the complainant.



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8. ROLES & RESPONSIBILITIES.

Entity	Responsibilities
Employer / Project Manager	Ensure implementation of POSH framework, provide resources, enforce disciplinary measures.
Social / Labour Expert	Conduct monitoring, training, documentation, and liaison with ICC.
Contractors	Disseminate policy to workers, ensure safe camps, display posters.
Supervisors	Maintain daily supervision, identify risks, report incidents.
All Workers & Employees	Follow behavioral code and report violations without fear.

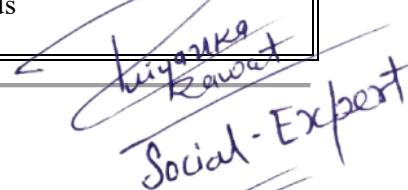
9. DISCIPLINARY MEASURES.

Depending on severity and ICC recommendation, disciplinary actions may include:

- Verbal or written warning.
 - Counselling or behavioural training.
 - Deduction of wages or suspension.
 - Termination of employment or contract.
 - Reporting to police or district magistrate in criminal cases.
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10. TRAINING & AWARENESS SCHEDULE.

Module	Target Audience	Frequency	Mode of Delivery
POSH Induction	All new employees/workers	At joining	Presentation / Visual module
Toolbox Talks	Labourers and site supervisors	Weekly	On-site demonstration
POSH Workshop	Engineers, ICC members, Managers	Quarterly	NGO/Legal expert session
IEC Awareness Drive	All personnel	Continuous	Posters, pamphlets, safety boards



11. MONITORING, REPORTING & EVALUATION.

- Monthly **implementation monitoring** by Social Expert.
 - Quarterly ICC review chaired by the Project Manager.
 - Annual **Compliance Report** submitted to the State Labour Department, including:
 - Number of complaints received/resolved.
 - Training and awareness sessions conducted.
 - Corrective actions and preventive initiatives.
 - Random field verification by Environmental & Social Specialist (PIU level).
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12. EMERGENCY RESPONSE & ESCALATION PROTOCOL.

- Immediate safety of the complainant is the top priority.
 - Incident to be escalated to Project Manager and ICC within 24 hours.
 - In case of criminal nature, ICC shall refer the matter to **Local Police or District Officer** under Section 509 of IPC.
 - **Emergency contact numbers** to be displayed prominently:
 - Police: 100
 - Women's Helpline: 1091
 - Ambulance: 108
 - Local District Control Room: [Insert Number]
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13. RECORD KEEPING & DOCUMENTATION

All POSH-related records including complaints, inquiry reports, meeting minutes, and training registers shall be securely maintained by the Social Expert for a **minimum period of 3 years** for audit and legal compliance purposes.



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14. REVIEW & CONTINUOUS IMPROVEMENT

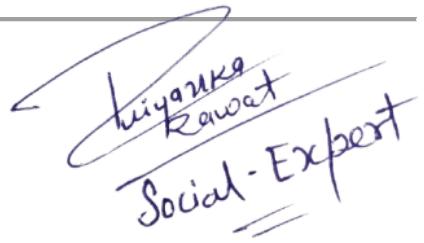
The Sexual Harassment Prevention & Redressal Plan shall be **reviewed annually** or whenever there are changes in legislation, project staffing, or operational conditions. Recommendations from ICC and Labour Department audits shall be incorporated into subsequent revisions.

Conclusion:

This plan reinforces the project's commitment to creating a safe, equitable, and respectful workplace by integrating gender-based risk management into daily operations. The framework ensures full compliance with statutory and contractual obligations under MoRTH and the POSH Act, 2013.

M/s ARKS Universal Pvt. Ltd.

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