



# **SANRAKSHAN**

## **(Society for Protection of Children)**

### **POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)**

#### **ABOUT SANRAKSHAN:**

SANRAKSHAN is a registered national-level non-governmental organization committed to the care and protection of underprivileged children from vulnerable backgrounds—including those living on the streets, in unsafe environments, or under traumatic conditions. Our primary mission is to rescue and protect children, ensuring they receive safety, shelter, education, and holistic development through our dedicated programs: Child Care Institution (CCI) – Providing a secure and nurturing home environment. Community-Based Care (CBC) – Strengthening families and communities to support children in need. Rainbow Community Care Learning Centre (RCCLC) – Offering academic support and life-skills training for children. Future Program for Young Adults (FPYA) – Guiding youth towards education, employment, and independent living. Special Juvenile Police Unit (SJPU) – Working in collaboration with law enforcement for child protection.

We are a committed child protection organization dedicated to creating safe, empowering spaces for vulnerable children and young adults. At Sanrakshan, every child is given the opportunity to heal, grow, and thrive.

Five years, we have remained steadfast in our mission to protect, rehabilitate, and support the holistic development of marginalized children and youth. Through our network of Child Care Institutions and community programs, we not only provide safety and care but also lay the foundation for emotional healing, education, life skills, and long-term well-being.

#### **Objectives:**

The Sexual Harassment of Women at Workplace (Prevention of Sexual Harassment) Act, 2013 was enacted to ensure safe working spaces for women and to build enabling work environments that respect women's right to equality of status and opportunity. The objective of this policy is to ensure that employees of SANRAKSHAN are treated with respect and equitably in an environment we believe to be free from sexual harassment, bullying and work-place harassment. SANRAKSHAN will not tolerate any form of harassment be it sexual, physical or verbal in nature and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment. It aims to provide a safe working environment and prohibits any form of sexual harassment {As per the Prevention of Sexual Harassment (POSH) Act 2013.

This policy applies to all the employees working at Head Office (HO) and at the respective project locations. SANRAKSHAN will not tolerate any type of harassment, if engaged in by



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staff, clients or by vendors or any other business associates. SANRAKSHAN is committed to ensuring that no employee who brings forward a sexual harassment concern is subject to any form of reprisal if found, person involved in reprisal will be subjected to disciplinary action. SANRAKSHAN will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

### **Definition:**

As per the act the sexual harassment at workplace is defined as any unwelcome, sexually determined physical, verbal, or non-verbal conduct, that includes sexually suggestive remarks about women, demands for sexual favours, and sexually offensive visuals in the workplace.

It also includes anyone or more of the following unwelcome acts or behaviour (whether directly or by implication), namely:

- Physical contact or advances
- A 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

### **Responsibilities Regarding Sexual Harassment/Workplace Harassment:**

All interested parties at SANRAKSHAN have a personal responsibility to ensure that their behaviour is not contrary to this policy. All interested parties are ensured to work environment free from Workplace Harassment and Sexual Harassment.

### **Structure of Internal Complaints Committee (ICC):**

SANRAKSHAN has constituted the Internal Committee (IC) for redressal of Sexual Harassment/Workplace Harassment made by victims and ensuring time bound action of such complaints. The Internal Committee (IC) consist of the following members provided at least one-half of the total members are woman.

1. Presiding Officer: A woman employed at a senior level amongst employees. In absence of such employee, the founders shall be the Presiding Officer



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2. Member: A woman employee from the middle management
3. Member: A senior employee from the division where the Harassment is originated
4. Member: A member (preferably woman) of an NGO or Lawyer who works towards the upliftment of women in the society
5. Member: A representative from the Leadership team

### **Conditions to be applied on the Internal Committee (IC):**

1. The presiding officer and the member of the IC shall not hold the position for not more than three years from the date of appointment
2. The members appointed from the NGO shall be paid a fee for holding the proceedings of the IC by the employer as per agreed terms by the parties
3. If the presiding officer or any member of the IC
  - a) Discloses any information of the inquiry
  - b) Has been convicted for an offense or an inquiry into an offense under any law for the time of being unforce pending against them
  - c) Has been found guilty in any disciplinary proceedings
  - d) Has so abused their position as to render his/her services on the position they hold

Such Presiding Officer and Members of the committee, shall be removed from the committee and the vacancy shall be filled with fresh nomination

The Presiding Officer has the right to nominate more members of appropriate seniority into the Internal Committee. The Presiding Officer will also ensure equal representation of gender as that of the complainant

### **Responsibility of Internal Committee:**

- Receiving every complaint of sexual harassment without bias which may be formally written, verbally communicated or emailed
- Initiating and conducting an enquiry as per the SoP
- Submit the findings of enquiries and their recommendations
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment



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- Coordinating with the Management in ensuring right action is taken against the accused
- Maintaining confidentiality throughout the investigation
- Discouraging and preventing employment-related sexual harassment
- Involve enforcement authorities in case of requirements

**The POSH Committee will constitute of below members:**

Sl No.	Name of the Member	Designation	Contact Number	Position in POSH
01	Mrs. B S Bharathi Devi	Board Member	9108377782	Presiding Officer
02	Mr. Shamboling Khot	Vice- President	7406104206	Committee Member
03	Mrs. Ravikumari C	Person In charge	7019480137	Committee Member
04	Ms. Chandana Deepthi	Counselor	9353446473	Committee Member
05	Mr. Abbutalha	Lead Accounts & HR	7892949402	Committee Member

### **Standard Operating Procedure to File a Complaint:**

1. Any victim may make in writing of sexual harassment to the Internal Committee within a period of three (3) months from the date of incident and in case of series of incidents, within a period of three (3) months from the date of last incident
2. Where such complaints cannot be made in writing, the presiding officer or the member of the IC shall render all reasonable assistance to the woman for making the complaint in writing
3. Where the victim is unable to make a complaint on account of her/his physical or mental incapacity or death otherwise, their legal heir or such other person as may prescribed may make the complaint

### **Conciliation:**

The Internal Committee (IC) before initiating an inquiry and on request of the victim can take steps to settle the matter between the victim and respondent through conciliation, provided no monetary settlement shall be made as a basis of conciliation.

If both the parties have arrived at a settlement after interference of the IC, the settlement shall be documented and submitted to the Management. The IC shall provide the copies of the settlement to the victim and the respondent.



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Once the settlement is arrived, no further inquiry shall be conducted by the Internal Committee.

### **Standard Operating Procedure in cases where conciliation is not undertaken or failed:**

#### Expectations from the Employees

1. An employee who has tried to express their disapproval of certain behaviour or who is not comfortable to confront the harasser can make a formal written complaint to any member of the IC (preferably the presiding officer). If the complaint is against any member of the IC, then a formal letter can be sent to the founders within 3 months of such incident
2. If the victim is not in a state of mind to make written complaint, they can take support of any member of the IC and file a written complaint within 3 months of such incident
3. Employee is expected to disclose their name and location that they are working in to enable the presiding officer to contact them and take the case forward
4. Employees can also write directly to [abbutalhasanrakshan@gmail.com](mailto:abbutalhasanrakshan@gmail.com)
5. Complaints against any member of the IC or any above position can be sent to [sanrakshanindia1@gmail.com](mailto:sanrakshanindia1@gmail.com)
6. The presiding officer will proceed to determine whether the allegations made by the victim fall under Sexual Harassment within a period of 30 days from the date of receipt of the compliant. If the case doesn't fall under the preview of sexual harassment the presiding officer will record the finding with reasons and communicate the same to the complainant
7. If the presiding officer determines that the allegations constitute an act of Sexual Harassment. She will proceed to investigate the allegations with the support of the IC
8. If the conduct accounts to any specific offence of the law, SANRAKSHAN will initiate appropriate action by making a complaint with the appropriate authority
9. The IC shall conduct such investigations in a timely manner and shall submit a written report containing the finding and recommendations on actions to be taken the Top Management not later than 90 days from the date of receipt of complaint. The Board Members and the Top Management will jointly take decisions on corrective actions based on the recommendations of the IC and keep the Complainant informed of the same.



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### **Corrective actions may include the following:-**

- a. Formal apology
  - b. Counselling
  - c. Written warning to the Respondent and a copy of it to be maintained in the employee record
  - d. Change of work assignment/Transfer either the victim or respondent
  - E. Suspension or termination of services of the employee found guilty
- In case the complaint is found to be false, the complainant shall, if deemed fit be liable for appropriate disciplinary action by the management.

### **Confidentiality:**

We understand that it is difficult for the victim to come forward with a complaint of sexual harassment. We recognize the victim's interest in keeping the matter confidential. To protect the interest of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigation process to the extent practicable and appropriate in the circumstances.

### **Reports and Documents:**

All records and documents including contents of meeting, results of investigation and other relevant materials will be kept confidential by the company except where disclosure is required under disciplinary or other remedial process or instruction by the enforcement authority.

### **Conclusion:**

SANRAKSHAN reiterates its commitment to providing its employees, a workplace free from harassment discrimination and where every employee is treated with dignity and respect.

### **ANNEXURE 1**

#### **List of Do's & Don'ts in relation to virtual meetings & calls**

1. Please indicate if the call or any other interaction is likely to be audio or video well in advance.
- 2 Dress appropriately during all virtual meetings and calls.
3. In case employees are working from home, please be sensitive to their privacy. especially if the interaction is scheduled after working hours.



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4. The organiser must make best efforts to ensure that virtual meetings and calls are conducted during reasonable working hours. If work exigencies require meetings after office hours, please provide reasonable advance notice.
- 5 In case video option is not required please do not insist upon the same.
6. Ensure that background images, if any are not offensive.
7. Refrain from making any sexually inappropriate gestures or comments.
8. Please behave professionally at all times if you're part of tech enabled or digital group if connected to the extended workplace. These could include informal whatsapp groups, linkedin or social media groups.
9. Please refrain from any digital interaction which affects the productivity of the persons at the workplace.

### **ANNEXURE 2**

#### **Draft Complaint Form**

Date :

The Presiding Officer

(Address of SANRAKSHAN Office Where Individual is working)

Name of the Complainant -

Employee Code -

Department -

Brief description of the complaint :

I Hereby state that whatever has been mentioned herein above is true to the best of my knowledge Iam making this complaint without any malice / bias.

(Signature of the Complainant)