

POSH Policy (Prevention of Sexual Harassment Policy)

Introduction:

The POSH Policy enables **to ensure a safe and respectful working environment for women (scope includes women who are students, teaching & non-teaching faculty, contractual & temporary workers, guests, visitors and publics within the premises of the institution)**, free from sexual harassment and is in compliance with the "Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013."

Scope:

The Institution upholds a policy of Zero Tolerance towards sexual harassment in any form. It is committed to providing a safe, secure, and dignified environment for all women within our institution- be it employees, students, research scholars, faculty, contractual staff, and visitors, irrespective of gender, sexual orientation, caste, creed, class, or position. The Institution is unequivocally committed to a **zero tolerance approach** — no act of sexual harassment will be excused, condoned, or overlooked, irrespective of the position, role, or seniority of the individual involved.

Any act of sexual harassment, as defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and further elaborated under the UGC (Prevention, Prohibition and Redressal of Sexual Harassment of Women Employees and Students in Higher Educational Institutions) Regulations, 2015, will be viewed with utmost seriousness and will invite immediate disciplinary action, including termination, rustication, or other penalties as may be applicable under service or institutional rules.

Sexual harassment in any form is strictly prohibited within the campus and in all settings and activities connected to the Institution, including but not limited to classrooms, laboratories, offices, hostels, libraries, cafeterias, sports facilities, virtual classrooms, study tours, fieldwork, internships, or any other academic, administrative, or social event organized or sponsored by the Institution.

Definition of Sexual Harassment:

Sexual harassment is defined as any unwelcome behavior of a sexual nature against a woman student or employee, including but not limited to:

- Physical contact and advances
- Demand or request for sexual favors
- Sexually colored remarks or comments (jokes, gestures, songs)
- Showing pornography
- Use of electronic media (emails, messages, social media posts etc) to share sexually offensive content including digital harassment

- Sex based discrimination or intimidation that affects a woman's dignity or equality at the workplace or educational setting
- Interference with work or studies or creating an intimidating offensive hostile environment and expressed/implied threats
- Humiliating treatment likely to affect the health or safety of the person.
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

Internal Complaints Committee (ICC)

An Internal Complaints Committee (ICC) as per guidelines has been established to address complaints of sexual harassment. The Committee constitution is as follows:

#	Name	Dept	Role
1	Dr Seema Shrinivas	ECE	Presiding Officer
2	Prof. Suman T D	MBA	Faculty member
3	Dr Ravikumar D V	Mech. Engg	Faculty member
4	Rajesh M S	HR	Non Teaching Staff
5	Sabarimathy K	HR	Non Teaching Staff
6	Abhishek	PED	Non Teaching Staff
7	Dhyan Kumar	CSE	4 th Sem Student Representative
8	Meghana	CSE	4 th Sem Student Representative
9	Sinchana	MBA	2 nd Sem Student Representative
10	Meghana Srinivas	TRUSTIN	External Member

The ICC so constituted meets the POSH Act & UGC Guidelines as below:

- a. Presiding officer is a woman senior member.
- b. At least 2 women employees (preferably with expertise in Law/HR/Psychology)
- c. An External member (preferably from NGO/expert in POSH)
- d. Student Representatives
- e. Non-Teaching Staff members
- f. At least 50% of ICC members are women.
- g. ICC consists of minimum 4 members (presiding officer + members)
- h. Tenure (Other than Student Representatives) shall be for a minimum of 2 years for all ICC members.

ICC Functioning in Cases Involving Authority, Conflict of Interest or Institutional Leadership

Where the respondent is in a position of authority, influence, or decision-making power over the aggrieved person, or where the respondent is a member of the Internal

Complaints Committee (ICC), or holds a leadership position within the Institution including but not limited to the Head of the Institution, senior management, or governing authority, the ICC shall ensure that the inquiry is conducted in a fair, impartial, and conflict-free manner.

Any ICC member against whom a complaint is made, or who has a direct or indirect conflict of interest in the matter, shall recuse themselves from all stages of the inquiry and shall not participate in deliberations, decision-making, or recommendations relating to the complaint.

In such cases, the Institution shall reconstitute the ICC for the limited purpose of the inquiry by appointing an alternate eligible internal member and/or an external member with appropriate legal or social work expertise, in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Where the respondent is the Head of the Institution or where internal reconstitution is not feasible or may compromise impartiality, the complaint shall be referred to an appropriately constituted Local Complaints Committee (LCC) or such other competent authority as prescribed under law, without prejudice to any other legal remedies available to the aggrieved person.

At all times, the inquiry shall be conducted with due regard to confidentiality, principles of natural justice, protection against retaliation, and statutory timelines.

COMPLAINT PROCEDURE

Filing of Complaint:

If subject to harassment as defined, the aggrieved person shall submit the complaint to the ICC via its official email ID (posh@gat.ac.in). Complaint **may also be filed individually and in confidence** to any ICC member by electronic mail to the member or via the Drop Box provided for the purpose at the premises of the institution. If the aggrieved person is physically or mentally incapacitated, deceased, or otherwise unable to file the complaint, then her relative or friend, her co-worker, or any person having knowledge of the incident can file the complaint on her behalf.

Timeline to file complaint:

Complaints should be filed within 90 days of the incident or from when the incident came to the notice of the aggrieved individual. The ICC may extend this period by another **3 months** if it is satisfied that circumstances prevented the complainant from filing earlier.

Disposal process of Complaint:

1. Upon receipt, the ICC shall acknowledge the complaint in writing, issue notice to the respondent within 7 days from the receipt of complaint, assign a case number, and maintain it in strict confidentiality.
2. The Head of the Institution (CSS/Principal/Director/CEO) is informed formally that a complaint has been received.
3. The ICC and all authorities including peers and important collaterals of the complainant shall ensure strict confidentiality regarding the complainant's identity, the content of the complaint, and the proceedings.
4. Breach of confidentiality shall constitute an offence and shall be subject to disciplinary action as per policy.
5. The complainant's dignity, privacy and academic / workplace standing shall be protected at all times.
6. If the aggrieved woman seeks a conciliation, the ICC may proceed with it .
7. If conciliation is not requested, or fails, the ICC shall initiate a formal inquiry.
8. The ICC has powers similar to Civil Court under the provisions of the Act to:
 - a. Summon and enforce attendance of persons;
 - b. Require production of documents;
 - c. Examine witnesses under oath.
9. Both parties must be given copies of the written complaint and response.
10. No legal practitioner is allowed to represent either side before the ICC.
11. The ICC will ensure natural justice: (a) equal opportunity to be heard, (b) Opportunity to produce evidence, and (c) cross-examine witnesses.

Interim Relief for aggrieved person:

During the pendency of the inquiry, the ICC may recommend interim actions to the Principal/Management including:

- a. Transfer of the aggrieved woman or the respondent;
- b. Grant of leave to the aggrieved woman (up to 3 months, in addition to regular leave);
- c. Restriction of contact between complainant and respondent;
- d. Any other relief deemed appropriate.

Completion of Inquiry:

The ICC shall complete the inquiry within 90 days from the receipt of the complaint.

A confidential written report is then prepared, signed by all members, and submitted to the Principal/Management within 10 days of completion, with Copies provided to both parties.

Inquiry Recommendations:

If allegation is proven, the ICC shall recommend to the Management for:

- a. Disciplinary action as per institution policy / student conduct regulations;

- b. Deduction from salary or stipend of the respondent as compensation to the aggrieved woman
- c. Other corrective measures — counseling, warning, community service, or removal from position/responsibilities.
- d. The aforesaid measures do not prevent or restrict the aggrieved party to seek any other remedial measures available under the provisions of Indian law.

If allegation is disproven:

- a. ICC shall recommend that no action is required against the respondent.
- b. ICC may suggest measures to restore the dignity of both parties and prevent victimization.

Appeal Process:

Right to Appeal:

The right of appeal is available to:

- a. The aggrieved woman (complainant), or
- b. The respondent (accused), or
- c. Any person affected by the ICC's recommendations for action.

Grounds for appeal:

The appeal may be filed against:

- a. ICC findings that the complaint is proved / not proved;
- b. Disciplinary action or penalty recommended by ICC;
- c. Failure or delay of the institution to implement ICC's recommendations;
- d. Perceived violation of natural justice or procedural irregularity during the inquiry.

Authority & Timeline for Appeal:

The appeal lies before the Management of our Institution, or any other competent authority. The appeal must be filed within 90 days from the date of receipt of ICC recommendations.

False or Malicious Complaints

If the ICC finds that the complaint was malicious or made with false intent, it may recommend action against the complainant, only after due inquiry and proof of mala fide intention.

A mere inability to substantiate the complaint is not grounds for punishment.

Retaliation or victimisation (by faculty, staff, or peers) is strictly prohibited and constitutes a separate offence under the policy.

Assistance for aggrieved complainant (Women Staff/Students):

1. The institution shall facilitate access to counselling services or psychological support through trained counsellors or tie-ups with professional mental health service providers.
2. In sensitive cases, the complainant may also be accompanied by a trusted person or peer counsellor during interactions with the ICC.
3. The ICC may offer Academic Reliefs to the complainant, including but not limiting to Extension of submission deadlines, Permission to attend classes in a different section or dept, Change of guide/supervisor, Permission to withdraw temporarily or defer a semester and/or Alternate evaluation arrangements
4. The ICC may offer Safety measures such as temporary relocation, transfer of hostel room, alternate seating etc to the complainant.
5. The ICC may offer Financial or Administrative assistance in deserving cases.
6. The ICC may offer facilitation for filing complaint if the complainant is indisposed
7. If incidence includes a criminal offence, the ICC shall offer legal and procedural support to the complainant.
8. The ICC through the institution shall guarantee protection to the complainant and witnesses from retaliation, victimisation, or academic disadvantage.

Management's Right to Initiate Criminal Proceedings

Notwithstanding anything contained in this Policy or any procedure prescribed for inquiry by the Internal Complaints Committee (ICC), the Management reserves the right to initiate appropriate criminal proceedings in accordance with applicable law, including lodging of a complaint with the police and engaging such other State or statutory authorities as may be required, where the alleged act constitutes a cognizable offence or where circumstances so warrant.

The initiation of such criminal or legal process shall be independent of, and without prejudice to, the inquiry or recommendations of the ICC under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and shall be undertaken with due regard to confidentiality, principles of natural justice, and the safety and dignity of the aggrieved person.

Reporting:

1. Inquiry Report : Within 10 days of completing each enquiry
2. Implementation Report: Within 60 days after submission of Inquiry report
3. Quarterly / Half Yearly Internal Reports
4. Annual Report : towards end of every financial year

Information & Awareness:

The following information shall be displayed prominently on the Institution's website and noticeboards:

- a. The ICC composition and contact details
- b. The POSH policy and complaint procedure
- c. Awareness material on students' rights, support systems, and available counsellors.

Orientation sessions for new students will include briefing on gender sensitisation and redressal mechanisms.

Training & Capacity building :

In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, applicable Rules thereunder, and in alignment with AICTE and UGC guidelines, the Institution shall ensure :

- a. Structured, periodic and documented training and awareness programmes on Prevention of Sexual Harassment (POSH).
- b. Members of the Internal Complaints Committee (ICC) shall mandatorily undergo capacity-building and refresher training at defined intervals to ensure continued competency in statutory provisions, principles of natural justice, inquiry procedures, evidence evaluation, confidentiality requirements, report writing, and timelines prescribed under law.
- c. General POSH awareness and sensitization programmes shall be conducted for all employees, including faculty, staff, contractual personnel, and students, at the time of induction and periodically thereafter, through appropriate modes such as classroom training, workshops, or digital learning platforms.
- d. The Institution shall maintain records of such trainings, including attendance and content coverage, as part of its statutory and occupational health and safety compliance framework, and shall review the effectiveness of these programmes periodically as part of continual improvement and preventive action.

Sl #	Training intervention	Periodicity/ timeline
1	General Awareness (to cover all stakeholders in batches)	Lean Academic period / commencement of Sem
2	ICC Members training	Annually Once, preferably beginning of Sem or if and when new members are appointed to the ICC