

PREVENTION OF SEXUAL HARASSMENT POLICY

PADALA CHARITABLE TRUST



PASSED BY THE BOARD VIDE MINUTES
DATED – 08 – 09 – 2024

2024

Approved by the Board on 08th September 2024 as documented in the minutes dated 08th September 2024.

Issued by: Managing trustee

Effective from 15th September 2024.

Effective to: This document remains valid for three years from the date of issuance, unless amended earlier by a resolution of the Board. It may be revalidated by the Board through a resolution after three years.

Modification procedure: Any alterations to this document must undergo approval by the Board of Trustees before incorporation. All modifications will be integrated into a new document and subsequently reissued.

NGO Address:

Registered Address: 1-344, RAJIV NAGAR 2, RAYUDUPALEM, KAKINADA – 533005, AP

Administrative Office: 7-249, AVANTHI NAGAR NEAR APSP, THIMMAPURAM, KAKINADA, AP

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- Dasari Suresh - Vice President
- Vagu Viswanadh - Secretary
- Sidagam Sanjeev - Treasurer
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ABOUT PCT (PADALA CHARITABLE TRUST)

Padala Charitable Trust (PCT) is a non-governmental organization established in 2002, with a mission to transform the lives of students in government schools across rural and remote villages in Andhra Pradesh and Telangana. Founded by Surya Prasad Padala, an alumnus of IIT Kharagpur and former US-based software consultant, PCT started with a vision to give back to society, inspired by the financial support he received from friends, teachers, and non-profits for his education. Initially focusing on providing scholarships to bright yet underprivileged students, PCT expanded its initiatives over time, recognizing deeper issues within the education system. This led to the inception of various programs aimed at empowering students both academically and personally.

Our primary focus lies in partnering with government schools. We have carefully designed two types of programs to address the diverse needs of the students coming from underprivileged backgrounds. The first category includes Individual Empowerment Programs, which provide financial assistance, material support, personalized guidance, and mentoring to underprivileged students, ensuring access to school education and higher education. The second category comprises Large Scale, classroom-based Awareness Programs. These initiatives aim to address broader student audiences, especially from government schools, by identifying and raising awareness about key issues such as reproductive health, menstruation, child marriages, life skills education, career counselling, and child sexual abuse. In our Classroom-based Awareness Workshops, we employ carefully crafted presentations, informative videos, impactful storytelling, and interactive hands-on activities. By utilizing these diverse methods, we create an environment conducive to empathetic teaching and open dialogue, allowing us to address critical issues and ignite essential conversations among students.

In line with these initiatives, PCT has been recognized as a "Great Place to Work" for two consecutive years 2023-24 & 2024-25, attesting to our exemplary workplace culture. Additionally, we have received the prestigious Guide Star Transparency Key International PCT,

underscoring our transparency and accountability. For the past many years, PCT has the government approvals to receive foreign funds (FCRA) and corporate social responsibility (CSR) contributions.

We express sincere gratitude to our generous donors and sponsors whose financial support is the backbone of all our programs, enabling us to make a significant impact in the lives of students in government schools. We also extend heartfelt thanks to our programs' donors and the government for their unwavering encouragement and collaboration. Together, we are making a difference. Our impact is our legacy.

ABOUT THE POLICY

The Prevention of Sexual Harassment (POSH) Policy is established to ensure a safe and respectful work environment for all the current and future employees of Padala Charitable Trust (PCT). The policy focuses on three main areas which are Prevention, Prohibition, and Redressal. Every person has fundamental rights and serious action will be taken against sexual harassment in the workplace. This policy is a tool that protects employees of PCT regardless of gender by clearly defining sexual harassment and procedures to follow in case there is a complaint. This policy outlines our commitment to preventing and addressing sexual harassment within the organization.

PURPOSE OF THE POLICY

The POSH Act was established in 2013 by the Ministry of Women and Child Development. PCT built its own POSH policy as it is required by the Indian Government that every organisation with more than 10 employees have a POSH policy. The purpose of this policy is to give assurance to all the employees of PCT that they will be provided with a safe and respectful work environment regardless of their gender. The policy also addresses the actions to take against harassment and requires every employee to be familiarised with the POSH Act. This policy ensures that all the procedures such as training, reporting, investigating, etc are executed effectively. We believe that by adhering to this POSH policy, we can ensure a safe and respectful workplace for all.

INTERNAL COMPLAINTS COMMITTEE

An Internal Complaints Committee (ICC) will be established and maintained at PCT, as a mechanism for redressal of complaints related to Sexual Harassment. ICC will be chaired by a PADALA CHARITABLE TRUST employee holding at least the position of Presiding Officer. The committee will have Two other members comprising of Two women, one PADALA CHARITABLE TRUST staff (from the middle management level) and one member of the Governing Board and one external member. The purpose of the committee is to assist in decision-making while considering all aspects of the situation and without bias.

The committee is responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting enquiry as per established procedure
- Submitting findings and recommendations of enquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines

A complainant (an employee of PADALA CHARITABLE TRUST) who believes he/she has been sexually harassed should:

- If comfortable to do so, inform the alleged harasser that his/her behaviour is offensive, unwelcome, against the organisation's policy and should stop.
- He/she should take a note of the date, time and location of the incident/s
- If not comfortable to confront the alleged harasser or if unwelcome behaviour continues, report to the nominated Complaint Redressal Committee

If this is inappropriate, speak to another senior member of the organisation, the head of the organisation or a member of the Governing Board

Timeline of complaint and committee's action

- The complaint must be lodged within 3 months from the date of incident/last incident by the aggrieved person or his/her friend, relative, Co-worker or any person having the knowledge of the incident
- After receiving the complaint, the informal resolution (if possible) between the complainant and the respondent is completed within 2 weeks
- The respondent replies with all supporting documents within 10 days of receiving the complaint, if a formal investigation is initiated
- The Complaint Redressal Committee's final report is completed and submitted to PADALA CHARITABLE TRUST's HR director within 90 days of initiating the formal investigation.

Conciliation

- The Internal Committee may, at the behest of the aggrieved woman, before beginning its investigation take steps to settle the matter between the aggrieved woman and the accused through conciliation.
- No monetary settlement may be made through conciliation.
- The Act and the Central Rules spell out implementation procedures with regard to conciliation

APPLICABILITY OF THE POLICY

The following persons come under the purview of the POSH Policy:

- Members of the Governing Board
- Employees
- Volunteers, interns
- Consultants, and Visitors who come to PADALA CHARITABLE TRUST for any purpose

Date of adoption

This policy adopted on August 31st, 2024 after being presented and deliberated at the meeting of the Governing Board.

Dissemination

- This POSH Policy is a public document and is available on our website, and on request at our Human Resources Department or any of our offices.
- It is officially handed over to all new recruits, volunteers, consultants and interns and is an official part of any agreement with our partners

LIMITATIONS OF THE POLICY

Although the policy was prepared with much care and effort to include every aspect to ensure the safety and protection of employees, it is crucial to understand that some situations might require further guidelines or strategies. The policy will be updated as needed to include further aspects as we encounter them.

STANDARD OPERATING PROCEDURE FOR REPORTING

Any individual who experiences or witnesses sexual harassment should follow the below procedures –

- Report the incident immediately to their manager, or an internal POSH committee member
- Provide details of the incident, including date, time, location, and individuals involved
- Keep records of any evidence, such as messages, emails, or witness statements
- Report to local authority in writing

INVESTIGATION AND RESOLUTION PROCEDURE

PCT is committed to conducting fair and timely investigations. The POSH Internal Complaint Committee (ICC) should follow the below investigative and resolution procedures –

- Maintain confidentiality to the extent possible
- Interview all relevant parties and witnesses
- Collect evidence that proves the statements of the witnesses
- Make a determination based on the evidence
- Involve local authorities based on the severity of the case
- Implement appropriate corrective actions, which may include counselling, warnings, suspension, or termination
- Retaliation against the individual who reports a legal complaint is prohibited and is considered a serious offense
- The Internal Complaint Committee must review the policy with all the employees once the incident is resolved.

CONFIDENTIALITY PRINCIPLE

It is necessary to follow the below confidentiality principles to maintain the safety of the employees and the organisation.

- Personal information of the complainant and the individuals involved must be saved in a file which is password-protected
- ICC must not share the personal information of the individuals involved in the incident with anyone inside or outside the organisation except to relevant authorities
- Gather only relevant details of the incident and nothing more

TRAINING

According to the guidelines laid by the POSH Act 2013, every organisation must provide training on POSH to all employees. The training must include the following –

- Definition of SexualHarassment and otherrelated terms
- All the employees and volunteers must know the members of ICC
- Must address the importance of reporting sexual harassment
- Encouraging a culture of respect and zero tolerance for harassment

- Promoting open communication and reporting mechanisms
- Implementing appropriate disciplinary measures for offenders
- Clarify any doubts that employees have regarding the law against Sexual Harassment in the workplace
- Raising awareness through ongoing training and education programs

The purpose of the training is to prevent sexual harassment and to ensure that all employees and volunteers understand their rights and responsibilities.

CONTACT INFORMATION

Padala Charitable Trust

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Kakinada – 533005, Kakinada District, AP

Email: [**posh@pct-india.org**](mailto:posh@pct-india.org)

Contact: **7331126044**

Assistance

For any assistance or clarification regarding this policy please contact the POSH IC Committee at: 7331126044 or at [**posh@pct-india.org**](mailto:posh@pct-india.org)

SUBMISSION OF ANNUAL REPORTS

The Internal Committee is required to prepare and submit an annual report to the employer. The employer is required to include in its report the number of cases filed, and their disposal under this Act in the annual report of the organisation.

REVIEW AND RECERTIFICATION

The committee will be dissolved every five years and a new Chairman and members will be nominated. All nominations, including for vacancies caused by attrition or other reasons, will be made by a team consisting of all trustees of **PADALA CHARITABLE TRUST**

CONCLUSION

There is an official obligation and an individual obligation to fulfil the intent of this Policy. The Policy will be prominently displayed in all **PADALA CHARITABLE TRUST** office premises and it is expected that every employee will have a working knowledge of permissible activities in the work place and will seek guidance from HR department.

This Policy is scheduled for recertification on or before **15/08/2025** unless there is a need for change before the scheduled time.

Details of PADALA CHARITABLE TRUST Internal Committee members are mentioned below:

- “Presiding Officer” – V Varalakshmi.
- Chairperson: S Rajyalakshmi
- Min. 2 members from employees who have had experience in social work or have legal knowledge or are committed to the cause of women.
 - K Srinivas (Director)
 - TVRK Raju (Director)
- PADALA CHARITABLE TRUST Middle Management
 - M Maha Lakshmi (Director)
- One member from Governing Board
 - S. Prabha (Trustee)
- One External Member
 - Dr. K. Sailaja

For PADALA CHARITABLE TRUST



MAJJI SATYAPRAKASH
Managing Trustee

GLOSSARY

Sexual Harassment – Sexual harassment includes sexual advances, requests for sexual favours, verbal or written comments of a sexual nature, display of sexually explicit materials, offensive jokes or comments, and any other unwelcome conduct of a sexual nature that creates a hostile or intimidating environment.

Complainant – Any individual who makes a legal complaint.

PCT employees or members – This includes the following people, board of trustees, full-time employees, part-time employees, interns, and volunteers.

Workplace – A workplace is a location where someone works for their employer, a place of employment. Such a place can range from a home office to a large office building or factory.

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