

## Policy on Sexual Harassment

### The Policy Statement

SGSU is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. SGSU will operate a **Zero Tolerance** policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including immediate dismissal from employment with no Salary / Notice Period payout.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

### Definition of Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

### **Physical Conduct**

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

### **Verbal Conduct**

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

### **Non-Verbal Conduct**

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

### **Communication Conduct**

- Display of any Objectionable material through messages, whatsapp, pictures
- Personal Invitation for a meeting, travelling outside for any purpose

Anyone can be a victim of sexual harassment, regardless of their sex and of the



sex of the harasser. AISECT Group recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

SGSU recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

**Anyone, including employees of SGSU, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.**

**All sexual harassment is prohibited whether it takes place within SGSU premises or outside, including at social events, business trips, training sessions or conferences sponsored by SGSU.**

### **Complaints Procedure**

Anyone who is subject to sexual harassment should, if possible, **inform the alleged harasser immediately that the conduct is unwanted and unwelcome and should be able to produce / submit immediately all types of evidence in front of designated Committee (such as – History of Phone Calls, Call recordings, WhatsApp messages etc.)**. SGSU recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc.

When a designated person receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands the company's procedures for dealing with the complaint
- keep a confidential record of all discussions
- respect the choice of the victim

Throughout the complaints procedure, a victim is entitled to be helped by a counsellor within the company. SGSU will nominate a number of counsellors and provide them



with special training to enable them to assist victims of sexual harassment. SGSU recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. SGSU understands the need to support victims in making complaints.

### **Complaint Mechanism**

The designated person who initially received the complaint will refer the matter to a Human Resources Manager to instigate a formal investigation. The Human Resources Manager within Seven days will parallelly refer the matter to the designated Committee and start collecting for evidence for final action in accordance with this policy.

The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within

**[Seven]** days of the complaint being made

### **Sanctions and Disciplinary Measures**

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

#### **Implementation of this Policy**

SGSU will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook.

#### **Internal Complaints Committee (Henceforth known as 'committee')**

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "**Internal Complaints Committee**" is constituted. The detail of the committee is notified to all Employees at the location (workplace).

#### **The committee comprises of:**

- **Presiding Officer:** A woman employed at a senior level in the organization or workplace i.e. Director – HR / Director – Marketing.
- At least 2 members from amongst employees, committed to the cause of women and/or having legal knowledge
- One external member, familiar with the issues relating to sexual harassment
- At least one half of the total members is women

The **Committee** is responsible for:

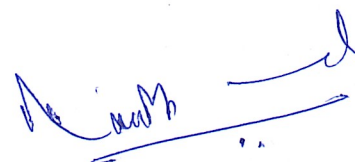


- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the Management in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- **Out of Seven Committee members, if Four members are present then their decision taken will be final**

Current nominated members of the committees are given in **Annexure A**.

**ANNEXURE A**  
**MEMBERS OF THE POSH COMMITTEE**  
**SCOPE GLOBAL SKILLS UNIVERSITY- BHOPAL**

<b>S.NO.</b>	<b>NAME &amp; DESIGNATION OF THE MEMBER</b>	<b>CONTACT DETAILS</b>
1	Dr. Neelam Singh , Dean	9009660427
2	Dr. S Veenadhari , Dean	9993504899
3	Dr. Satyendra Khare, Dean	9826051063
4	Dr. Shashikant Nagpure, HOD	9893391131
5	Dr. Raj Kumar Pandey, Dean	9993176566
6	Dr. Priti Maheshwary, Dean	9424100731
7	Dr. Vimal Kumar Sharma, External Member	9589069178



Vice Chancellor  
Scope Global Skills University  
Bhopal