



Internal Complaints Committee: IC Policy

1. Introduction

The Internal Complaints Committee (IC) is established under the mandate of Section 4 All India Council for Technical Education (Gender Sensitization, Prevention and Prohibition of Sexual Harassment of Women Employees and Students and Redressal of Grievances in Technical Institutions) Regulations, 2016 vide No. F.AICTE/ WH/2016/01 dated 10th June, 2016 *

2. Detailed Objectives

Prevention of Sexual Harassment

- To create and maintain a safe, secure, and respectful workplace and campus environment by taking proactive measures to prevent incidents of sexual harassment.
- To frame and disseminate policies, codes of conduct, and preventive guidelines in line with the provisions of the POSH Act, 2013.

Promotion of Gender Sensitivity and Awareness

- To foster a culture of mutual respect, inclusivity, and equality among students, faculty, staff, and other stakeholders.
- To integrate gender sensitization into institutional practices through workshops, campaigns, and interactive sessions.

Receiving and Redressing Complaints

- To provide a safe, confidential, and accessible mechanism for women employees, students, and stakeholders to lodge complaints of sexual harassment.
- To ensure that all complaints are acknowledged, documented, and addressed with sensitivity and fairness.

Conducting Fair and Timely Inquiries

- To investigate complaints in a prompt, unbiased, and transparent manner, strictly adhering to the procedures laid down in the POSH Act, 2013 and related institutional policies.
- To ensure that both complainant and respondent are given equal opportunity to present their case.

- To recommend appropriate action to the management based on findings of the inquiry.

Awareness and Sensitization Programs

- To organize regular orientation sessions, workshops, and training programs for students, faculty, and staff on prevention of sexual harassment and gender sensitivity.
- To promote awareness about the rights and responsibilities of stakeholders under the POSH Act, 2013.

Submission of Annual Reports

- To prepare and submit an annual report detailing the number of complaints received, resolved, and pending, along with preventive and corrective actions taken.
- To present the report to the institutional management and relevant statutory bodies as mandated.

3. Definition of Sexual Harassment

As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (commonly known as the POSH Act, 2013), sexual harassment is defined broadly to ensure protection of women at the workplace. The Act outlines both specific acts and circumstantial behavior that can be considered sexual harassment.

As per Section 2(n) of the Act, *sexual harassment* includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

1. Physical contact and advances
2. A demand or request for sexual favors
3. Making sexually colored remarks
4. Showing pornography
5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Section 3(2) further includes situations that may not be overtly sexual but are still considered harassment if:

- It has the purpose or effect of creating an intimidating, hostile, or offensive work environment.
- It interferes with a woman's work performance.
- It affects her employment opportunities.

Circumstances Considered Harassment (Section 3(2)):

Sexual harassment also includes any act that occurs under circumstances where:

- There is a promise of preferential treatment in employment.
- There is a threat of detrimental treatment or dismissal.
- It affects the employee's health or safety.
- It results in a humiliating work environment.

4. Scope of IC Policy

- Includes students, faculty, staff, and visitors.
- Applicable to both campus and institutional-linked off-site events.

5. Composition of IC:

- i. A Presiding Officer who shall be a woman Faculty member employed at a senior Level (not below a Professor in case of a University, and not below an Associate Professor in case of an Institution) at the Educational Institution, nominated by the Executive Authority.
- ii. Two Faculty members and two non-teaching employees, preferably committed to the cause of women or who have had experience in social work or have legal knowledge, nominated by the Executive Authority.
- iii. Three students (comprising of at least one girl student) of Pre-Final/Final year at Undergraduate/ Diploma Level Institution, as the case may be One member from amongst Non-government Organisation or Associations committed to the cause of women or a person familiar with the issues relating to sexual harassment, nominated by the Executive Authority
- iv. At least one-half of the total members of the IC shall be women.
- v. Persons in senior positions such as Chairperson/ Secretary of the Society, Principal/ Director of the Institution, etc. shall not be the members of the ICs in order to ensure autonomy of their functioning.
- vi. The term of office of the members of the IC shall be for a period of three years. Institutions may also employ a system whereby one-third of the members of the IC may change every year

6. Procedure for Complaints and Inquiry

Filing of Complaint

- Any aggrieved woman (student, faculty, staff, or research scholar) who experiences sexual harassment at the workplace/campus may file a written complaint to the Internal Committee (IC).
- The complaint should be submitted **within three months** of the date of the incident, or in case of a series of incidents, within three months of the last incident.
- The complaint may be written and signed by the complainant. If the complainant is unable to make a written complaint, the IC shall provide assistance in drafting the same.
- In special circumstances (such as physical or psychological incapacity), a complaint can be filed by a legal heir, relative, colleague, friend, or any other person having knowledge of the incident, with due authorization.

Acknowledgement and Registration of Complaint

- Upon receipt of the complaint, the IC shall provide an **acknowledgment** to the complainant.
- The complaint will be entered in the IC's confidential register with a unique case number to ensure systematic tracking.
- The IC shall maintain strict confidentiality of the identity of the complainant, respondent, and witnesses.

Preliminary Assessment

- The IC will conduct a preliminary review to verify if the complaint falls under the purview of sexual harassment as defined by the POSH Act, 2013.

- If the complaint does not qualify under the Act, the IC shall inform the complainant and may guide her to other grievance redressal mechanisms, as applicable.

Notice to the Respondent

- A copy of the written complaint, along with supporting documents, shall be sent to the respondent within **seven working days** of receipt of the complaint.
- The respondent shall be required to submit a written response, along with any supporting evidence and list of witnesses, within **ten working days** of receiving the notice.

Inquiry Proceedings

- The IC shall conduct the inquiry in accordance with the principles of natural justice, ensuring fairness and impartiality to both parties.
- Both complainant and respondent will be given opportunities to present their statements, evidence, and witnesses.
- Cross-examination of parties will not be permitted; however, both parties may submit questions to be posed by the IC.
- The inquiry shall ordinarily be completed within **90 days** from the receipt of the complaint.

Interim Relief (if required)

- During the pendency of the inquiry, upon written request by the complainant, the IC may recommend interim measures such as:
 - Transfer of either party to another department or branch.
 - Grant of leave up to three months to the complainant.
 - Restriction of contact between complainant and respondent.
 - Any other measure deemed necessary for the safety and well-being of the complainant.

Findings and Recommendations

- On completion of the inquiry, the IC shall prepare a **detailed report** of its findings with clear reasoning.
- If allegations are proven, the IC will recommend appropriate disciplinary action against the respondent, which may include written apology, warning, withholding promotion/increment, termination, or other actions as per service rules.
- If allegations are not proven, the complaint shall be dismissed, and both parties will be informed.

Submission of Report

- The IC shall submit its inquiry report, along with recommendations, to the employer/management within **10 days** of completion of the inquiry.
- The management is required to act on the IC's recommendations within **60 days** of receiving the report.

Confidentiality

- The identity of the complainant, respondent, witnesses, and the details of the inquiry shall be kept strictly confidential and disclosed only to persons authorized under the Act.

Appeal

- Either party, if aggrieved by the recommendations of the IC or the non-implementation of such recommendations by the employer/management, may prefer

an appeal to the appropriate authority within **90 days** from the date of communication of the decision.

7. Redressal Actions

- **Disciplinary Actions Against the Respondent:** Depending on the gravity of the misconduct, the following actions may be recommended:
 - Warning or Reprimand
 - Written Apology
 - Adverse Remarks in Records
 - Withholding Benefits
 - Suspension from Duties/Classes
 - Denial of Promotion/Placement Opportunities
 - Termination/Expulsion
 - Legal Action

- **Institutional Support Measures for the Complainant:** To ensure the complainant's dignity, safety, and emotional well-being, the IC may recommend supportive and protective measures such as:
 - Counselling and Psychological Support
 - Grant of Leave (Up to three months' special leave as per Section 12 of the POSH Act, 2013, to enable recovery and reduce distress)
 - Transfer or Relocation or Flexi Arrangements
 - Academic/Workplace Support
 - Non-Retaliation Guarantee

8. Preventive Measures: Awareness and Sensitization

- Regular workshops, seminars, and orientation sessions.
- Display of IC details on notice boards and institutional website.
- Make complaint forms accessible, and guidance notes for ease of reporting.
- Place Awareness Posters and Signages
- Use simple, multilingual communication for better outreach and inclusivity.
- Provide institutional helpline contacts and grievance submission channels Ensure

9. Coordinator Name & Mail Id:

Dr. Neha Verma

nehaverma@shantibschool.edu.in

IC Committee

SBS/IC Committee/2025-26/01

July 10th, 2025

CIRCULAR

The staff and students are herewith informed that an Internal Complaint Committee (ICC) for the academic year 2025-26 has been constituted in our institution with the following members.

| Serial No | Name | Designation | Committee |
|-----------|-------------------------|-----------------------------------|---|
| 1. | Dr. Neha Verma | Associate Professor | Coordinator |
| 2. | Dr. Sandeep Makwana | Associate Professor | Member |
| 3. | Dr. Shreya Biswas | Associate Professor | Member |
| 4. | Dr. Sejal Trivedi | Assistant Professor | Member |
| 5. | Ms. Mili Kalaria | Head, HR & Academic Services | Member |
| 6. | Mr. Gaurang Bhatt | Assistant Manager, Program Office | Member |
| 7. | Ms. Nikisha Kapashi | Founder – Director, Prayatna | Member – NGO (Prayatna Counselling and Intervention Services) |
| 8. | Ms. Sheetal V | Student (2024-26)-PG | Student Representative |
| 9. | Ms. Anukriti | Student (2025-27)-PG | Student Representative |
| 10. | Mr. Vivekbharti Goswami | Student (2024-27)-UG | Student Representative |

The tenure of the nominated members will be renewed/reviewed annually.

We wish you all the best.

Shanti Business School, Ahmedabad