

# **GENDER POLICY OF SIPA**

For Prevention of Sexual Harassment (POSH) and Gender Development

## **1. CONTEXT**

1.1 SIPA is committed to creating a gender-sensitive workplace that ensures the rights and safety of all individuals. This policy aligns with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (POSH Act) and supports gender development in all SIPA projects and programs.

## **2. OBJECTIVES**

This policy aims to:

- 2.1 Ensure equal opportunities and a safe working environment for all genders.
- 2.2 Promote gender equity and equality across all strategies, projects, and programs.
- 2.3 Prevent and address gender discrimination and sexual harassment at all workplaces and field locations.

## **3. SCOPE**

3.1 This policy applies to all employees, consultants, interns, volunteers, and stakeholders engaged with SIPA, including in offices, training centers, guesthouses, and fieldwork locations.

## **4. KEY DEFINITIONS**

- 4.1 Sexual Harassment: Unwelcome physical, verbal, or non-verbal conduct of a sexual nature, including quid pro quo harassment and hostile work environment.
- 4.2 Gender Equality: Equal opportunities and treatment for all genders.
- 4.3 Gender Equity: Recognition of different needs to ensure fair outcomes for all.

## **5. FRAMEWORK TO PREVENT SEXUAL HARASSMENT**

- 5.1 All individuals, regardless of gender identity or sexual orientation, have the right to a harassment-free workplace.
- 5.2 Employees and associates must treat all colleagues respectfully and without discrimination.
- 5.3 Sexual harassment is a serious disciplinary offence.
- 5.4 Harassment may impact morale, mental health, and work performance and will not be tolerated.
- 5.5 Harassment can occur across all gender identities and orientations.

5.6 All allegations will be handled in accordance with SIPA's employment terms and disciplinary procedures.

5.7 SIPA promotes awareness and acceptance of gender and sexual diversity in the workplace.

5.8 An inclusive and respectful environment will be maintained for individuals of all identities.

5.9 The CEO shall ensure workplace safety from internal and external threats.

## **6. DEFINING SEXUAL HARASSMENT**

6.1 It is each individual's responsibility to challenge stigma, discrimination, and harassment.

6.2 Sexual harassment includes overt or covert actions that degrade a person's dignity or self-respect.

6.3 Unintentional acts that cause discomfort can still constitute harassment.

6.4 Examples include unwanted physical contact, suggestive comments, offensive invitations, or displays of sexual content.

6.5 Other examples include jokes or views that stigmatize sexual orientations or identities, and gender-phobic behavior.

6.6 No one should tolerate harassment and should report incidents promptly.

6.7 Concerns must be reported to the Internal Complaints Committee (ICC) immediately.

## **7. CONSEQUENCES**

7.1 Any individual found violating this policy will face disciplinary action as per the investigation and recommendations of the ICC.

## **8. INTERNAL COMPLAINTS COMMITTEE (ICC)**

8.1 The CEO will constitute an ICC with at least 4 members, including one external member.

8.2 The external member must have expertise in sexual harassment issues and relevant legal knowledge.

8.3 The Presiding Officer must be a senior female employee.

8.4 At least half of ICC members must be women.

8.5 Members will serve a term of up to 3 years.

8.6 Regional offices with 10+ staff must form separate ICCs.

8.7 The names and contacts of ICC members will be shared with all staff.

8.8 Orientation and training will be provided to ICC members.

8.9 ICC must respond immediately upon receipt of a complaint.

8.10 Complaints against the CEO will be handled by a BoT-constituted committee.

## **9. SEXUAL HARASSMENT COMPLAINT HANDLING PROCEDURE**

9.1 SIPA has established a transparent process for reporting and investigating sexual harassment complaints, aligned with the POSH Act.

## **10. REPORTING PROCESS**

10.1 The complaint must be submitted in writing to the ICC within 3 months of the last incident.

10.2 The ICC acknowledges the complaint and meets with the complainant to explain formal and informal resolution options.

10.3 If the complainant opts for conciliation, the respondent is informed, and the matter may be resolved without monetary settlement.

10.4 If the complainant is not satisfied, a formal inquiry will be initiated with hearings for both parties.

## **11. TIMELINES**

11.1 Complaints must be filed within 3 months; the ICC may allow a delay up to 2 years under valid reasons.

11.2 Complaint copies should be sent to the respondent within 7 days.

11.3 Respondents must reply within 10 days.

## **12. CONCILIATION**

12.1 ICC may initiate conciliation only with consent of the complainant. Settlements involving monetary compensation are not allowed.

## **13. CONFIDENTIALITY**

13.1 All complaint content and proceedings must remain confidential. No public or media disclosure is allowed.

## **14. FORMAL INQUIRY**

14.1 The ICC will follow natural justice principles while conducting the inquiry.

14.2 Investigation must be conducted with sensitivity to ensure objective fact-finding.

14.3 Statements of witnesses and parties will be impartially reviewed.

14.4 The ICC will complete its inquiry within 90 days and submit a report with recommendations.

## **15. INCONCLUSIVE ENQUIRY**

15.1 If the inquiry finds no conclusive proof, the ICC will recommend closure of the case to the CEO.

## **16. FRAMING OF CHARGES**

16.1 If the inquiry finds sufficient evidence, the ICC will recommend appropriate disciplinary actions. The CEO will take final action.

## **17. REFERRAL PATHWAY**

17.1 SIPA must ensure access to professional services such as medical care and counseling.

17.2 Support must be offered with full respect for the survivor's consent and privacy.

## **18. REPORTING TO POLICE**

18.1 Support will be provided to any employee who chooses to file a police complaint under the law.

## **19. COMPREHENSIVE SERVICES**

19.1 SIPA will provide continued access to medical, legal, and psychological support services.

## **20. DOCUMENTATION**

20.1 All complaints, proceedings, and support actions will be documented confidentially in compliance with legal and ethical standards.

## **21. ROLE & JURISDICTION OF ICC**

21.1 The ICC handles complaints, conducts inquiries, maintains confidentiality, and recommends actions.

21.2 It also facilitates awareness sessions and preventive strategies.

21.3 It operates in all SIPA locations with over 10 staff.

21.4 Training and capacity-building will be provided for all ICC members.

## **22. REPORTING & REDRESSAL MECHANISM**

22.1 The process includes complaint submission, optional conciliation, formal inquiry, confidentiality, disciplinary action, and appeal rights within 90 days.

## **23. PREVENTIVE MEASURES**

23.1 Regular POSH training for all staff.

23.2 Gender-sensitive hiring and promotion policies.

23.3 Clear display of POSH policy at all SIPA locations.

23.4 Provision of safe and flexible working conditions.

#### **24. REFERRAL & SUPPORT SYSTEMS**

24.1 SIPA will offer immediate and follow-up assistance including access to legal, psychological, and medical support.

#### **25. DECLARATION**

25.1 This policy affirms SIPA's commitment to a safe, inclusive, and respectful workplace, in compliance with the POSH Act, 2013.