



THE WAY FOR A BETTER TOMORROW

GAMANA

ANTI - SEXUAL HARASSMENT POLICY

(ASH POLICY)

(1st November 2015)

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1. OBJECTIVE OF THIS POLICY

GAMANA commits to providing a safe, healthy and congenial organizational environment to its entire staff. As a key organizational principle, GAMANA also commits to ensuring gender equality and gender justice through all its policies, practices and interventions. In order to uphold this principle, it is important that the work environment that GAMANA provides to its people is free from discrimination and harassment, particularly sexual harassment.

Sexual Harassment results in violation of Fundamental Rights to Equality under Article 14 & 15 and Right to Life and to live with human dignity under Article 21 of the Constitution of India. This policy provision termed as the Anti-Sexual Harassment Policy (ASH) of GAMANA has been formulated with a particular focus on sexual harassment at work place. The Policy is designed to take effective measures to prevent and prohibit sexual harassment and also have the mechanism to redress cases of sexual harassment and impose punishment for those responsible for it.

The conduct that is described as “Sexual Harassment” in this policy will not be tolerated and provided herein under is a procedure by which inappropriate conduct will be dealt with, if encountered among staff. While this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit the authority of GAMANA to discipline or take remedial action for workplace conduct which is deemed unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

Sexual harassment of employees occurring in the workplace or in other settings in which staff may find themselves in connection with their employment is unlawful and there will be zero tolerance in the organization¹ for this. All allegations of sexual harassment will be taken seriously and responded promptly and where it is determined that such inappropriate conduct has occurred, prompt and appropriate corrective action as is necessary, including disciplinary action, will be taken. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint will similarly be unacceptable and will not be tolerated in the organization.

2. SCOPE OF THE POLICY

This policy shall extend to all Staff of GAMANA. The Anti-Sexual Harassment Policy (ASH Policy) of GAMANA is a gender-neutral policy. It extends to all women, men and transgender staff of GAMANA. The effective implementation of this policy will not be affected by the sexual orientation and or the socio-cultural background of all staff.

This policy shall be in line with the provisions under the legal enactment on the subject that is the ‘The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013’, that have come into effect from 1st November 2015.

3. DEFINITIONS

For the purposes of this Policy;

1. “Staff” shall mean any person employed by GAMANA including GAMANA associates whether full-time, part-time, temporary, voluntary, seconded, contracted or casual and also researchers, trainees, consultants and employees of project partner.
2. “NGOs” for the purposes of this policy means any non-governmental organisation operating on a secular non-profit basis and involved in work concerning gender justice.



3. "Sexual harassment" includes any unwelcome sexually determined behaviour (whether direct or by implication) such as;
- physical contact and advances either physical or non-physical.
 - a demand or request for sexual favours.
 - sexually coloured remarks or conduct of a sexual nature.
 - showing pornography/graphic descriptions of sexual act.
 - creating a hostile work environment.
 - any other unwelcome "sexually determined behavior" be it physical, verbal or nonverbal.
 - Verbal abuse or comments that put down people because of their sex.
 - Comments about people's body.
 - Tales of sexual exploits.
 - Pressure for dates.
 - Sexually explicit gestures.
 - The difference between a friendly behavior and sexual harassment is that sexual harassment is an unwelcome act.

Explanation 1:

- "Unwelcome" is the key in defining sexual harassment. It is the impact and effect the behavior has on the recipient. Unwelcome "sexually determined behavior" shall include but not be limited to the following instances:
- where submission to or rejection of sexual advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment
- decisions; or,
- such advances, requests or conduct (whether direct or implied) have the purpose or effect of interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Explanation 2:

Creating a "hostile work environment" means

- Creating a workplace where Sexual Harassment may go unheeded, where despite complaints no action is taken, where there is nexus between accused/aggressor & higher management and where complainant is placed under fear, disadvantage or threat of victimization.
- It will also mean retaliation which includes:
 - ✚ marginalizing someone in the workplace with regard to his/her roles and responsibilities
 - ✚ socially ostracizing
 - ✚ intimidating someone physically, psychologically, emotionally or someone close to or related to the victim spreading canard
- And any other behavior that may commonly be construed as retaliatory

Note: All staff should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unacceptable and will be actionable.

Explanation 3:

"Sexual Harassment" in GAMANA and its associates shall also mean:

- Direct or implied requests by any staff for sexual favours in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

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- b. Other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to staff may also constitute sexual harassment.
- c. Adequate safeguard for the Children present in GAMANA office premises or associated with partner organisations or staff members of GAMANA is also being provisioned under this policy. However, specific cases of sexual harassment of such children that may arise would be dealt with by means of due statutory mechanisms as provisioned under the 'Protection of children from sexual offences (POSCO) Act, 2012'.

Explanation 4:

In addition, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- a. Unwelcome sexual advances.
- b. whether they involve physical touching or not;
- c. Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- d. Passing on pornographic material in print or electronic form or passing written offensive messages of sexual in nature (including through emails, MMS and text messages).
- e. Displaying sexually suggestive objects, pictures, cartoons, displaying body parts;
- f. Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- g. Inquiries into one's sexual experiences; discussion of one's sexual activities.
- h. Abuse of authority (Quid Pro Quo)
- i. demand by a person in authority, for sexual favours in exchange for work related benefits (e.g. a wage increase, a promotion, training opportunity, a transfer or the job itself).
- j. The behaviour that creates an environment that is intimidating, hostile, or offensive for members of one sex, and thus interferes with a person's ability to work.

4. PREVENTIVE ACTION

Consistent with the existing national law (The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013), GAMANA shall take all reasonable steps to ensure prevention of sexual harassment at work place. Such steps shall include:

- a. Circulation of GAMANA policy in Telugu/English/Hindi/vernacular in field offices on sexual harassment to all persons employed by or in any way acting in connection with the work and/or functioning of GAMANA; once it is translated properly in consultation with the Director.
- b. Ensuring that sexual harassment as an issue is raised and discussed at GAMANA meetings from time to time.
- c. Conduct or cause to carry out in-house gender & feminist related training on sexual harassment and addressing complaints to First Instance Persons (FIPs) as well as members of the ASH Cell.
- d. Widely publicize that the Sexual Harassment is a crime & will not be tolerated. [In case when they get appointed by other employer(s)].
- e. Director will ensure that the policy is presented to new staff during the time of induction and that the same has been read and understood.
- f. Each staff member during induction will be encouraged to act as an ambassador to spread the message that "sexual harassment has zero tolerance in GAMANA." Also, to help staff who are



not outspoken to speak freely about any such experience if faced by them or any other staff in their knowledge.

GAMANA will also take all the appropriate steps necessary to protect the concerned staff from retaliation in any form, in the following ways:

- ✚ The Accused shall be informed that any further unwelcome behavior towards the Complainant will be construed as major misconduct by the Accused and necessary action will be taken as per rules.
- ✚ Providing required security measures to the Complainant in consultation with the person such that the Complainant does not feel intimidated or threatened in the work situation.
- ✚ Counselling help to Complainant and Accused within a given time frame.

5. ANTI-SEXUAL HARASSMENT CELL

An Anti-Sexual Harassment Cell will be constituted by GAMANA for prevention and effective resolution of sexual harassment of any form in the organization.

1. The Director of GAMANA shall assume primary responsibility for effective constitution and functioning of the ASH Cell. It shall be the primary responsibility of the Director to constitute the ASH Cell in consultation with the Executive Body of GAMANA and renew its composition on the expiry of its term and to fill up vacancies as and when they may occur.
2. The ASH Cell shall comprise the following members:
 - a. Five persons of whom three shall be women including a Chairperson who shall also be a woman; Chairperson should be at least at the level of Senior Manager of GAMANA staff.
 - b. One person selected from GAMANA staff grades 2 or 3;
 - c. One person selected from GAMANA staff grades 4 or 5;
 - d. One member shall be a clinical psychologist; it is advisable that the clinical psychologist is external to GAMANA.
 - e. One, third party/NGO representative/lawyer familiar with the issue of sexual harassment;
 - f. In addition to the five persons, ASH Cell may also include an advisor or invitee who should preferably be female.
3. ASH Cell will play a strong preventive and redressal role in maintaining a workplace free from sexual harassment.
4. It will be the responsibility of the ASH Cell to groom senior woman leadership in GAMANA on ASH Policy matters. For this purpose, an understudy may be nominated by Director in consultation with the Executive Body of GAMANA and the Chair of the ASH Cell. The understudy shall be a woman and at least at the level of Senior Manager from GAMANA staff. The understudy will not be a Member of the ASH Cell.
5. Membership to the ASH cell shall generally be for a period of two years and not exceeding three years. Thereafter, new appointments shall be made. At least 2 members and not more than 3 should be retained for continuity. Tenure of a particular member may exceed two years to the extent necessary in order to ensure continuity as mentioned above.
6. A member of the ASH Cell shall cease to hold membership should any one of the following conditions arise:
 - a. Upon s/he ceasing to be a staff of GAMANA, in case the member is an GAMANA employee.
 - b. Any member of the ASH Cell without any valid reason remains absent without permission of the ASH Cell from three consecutive meetings



- c. Any member of the ASH Cell against whom a complaint of sexual harassment, violation of GAMANA code of conduct or violating confidentiality or criminal charges are made and prima facie established.
7. In the event of any vacancy on the ASH Cell due to resignation, termination, death or for any other reason whatsoever the same shall (within a period of two months of such vacancy) is filled in accordance with the procedures prescribed by this policy.
8. Each formal complaint that is received by the ASH Cell will merit the formation of an Enquiry Committee (EC). In other words, ECs may be constituted on a case to case basis.
9. The Chairperson of the ASH Cell will be required to present a quarterly report on the activities of the ASH Cell to the Director [and the FIPs]. Care must be taken not to breach confidentiality in these reports.
10. All regular meetings of the ASH Cell shall be fixed by the chairperson through mutual consultation among the members.
11. The ASH Cell shall be required to present a yearly Plan & Budget for preventive activities. This will form part of the budget. The travel expenses and boarding and lodging of external members/advisors will be borne by GAMANA/ASH Cell. In addition such members/advisors may be paid an appropriate honorarium.

6. The FIRST INSTANCE PERSONS (FIPs)

Though not mandated as per provisions of relevant National Law, designated colleagues will be nominated as First Instance Persons who will act as the first point of contact in the occurrence of any event of sexual harassment in the organization. This will provide colleagues with ease in accessing the policy provisions and also serve as a good practice that may be replicated in other organisations.

- a. FIPs will be nominated by the Field offices after an appropriate process of the Liaison office.
- b. FIPs need to have a strong commitment to women's rights and gender equality. They should also understand that complaints of SH are of a sensitive nature and confidentiality of all parties concerned, especially the complainant and accused has to be respected.
- c. FIPs will need to co-ordinate preventive activities within their offices to create a Sexual Harassment free atmosphere. The responsibility for ensuring that such activities take place lies with the Management of GAMANA.
- d. FIPs will be responsible for taking steps to ensure that cases of Sexual Harassment in GAMANA are brought to the notice of ASH Cell.
- e. FIPs would be sufficiently trained and capacitated to deal with informal complaints of Sexual Harassment with the report to the ASH Cell.
- f. The Director of GAMANA will in coordination with the Chairperson of the ASH Cell, ensure that at least 2 workshops are held every year to enable FIPs to upgrade their knowledge and skills.
- g. FIP & the Director have to inform all new staff of ASH Policy.
- h. The names and contact details of all members of the ASH Cell as well as First Instance Persons (FIPs) shall be prominently displayed on the main notice board of all GAMANA offices.
- i. First Instance Persons (FIPs) at the various levels of GAMANA may provide first instance/ first stage intervention in case of any complaint of sexual harassment. The ASH Cell shall undertake to impart training to such FIPs to equip them to respond effectively to first instance reports of sexual harassment.

7. PROCEDURE OF DEALING WITH COMPLAINTS OF SEXUAL HARASSMENT

1. If any staff at GAMANA believes that he or she has been subjected to sexual harassment, such person (or FIP who may have assisted the complainant or those who have otherwise observed sexual harassment at GAMANA) shall have the option to file a complaint with ASH Cell. This may be done in writing or orally. Even if it is done verbally initially, it is always preferable to have the complaint in writing.



2. A complaint may be filed by contacting any one of the members of the ASH Cell. The ASH Cell as well as FIPs will also be available to discuss any concerns staff may have and to provide information about GAMANA's policy on sexual harassment and the complaint process.
3. Informal complaints of SH may be made to the FIP or directly to the ASH Cell or any of its members as stated above.

INFORMAL WAY OF DEALING WITH COMPLAINTS

- a. An informal approach to resolve a complaint of sexual harassment can be through mediation between the parties involved and by providing advice and counselling on a strictly confidential basis. The procedures though less stringent than formal procedures will be conducted in the full spirit of this policy document.
- b. The case will be taken up for investigation at an informal level by the FIP or a member of the Enquiry Committee in a confidential manner. The matter will be reviewed and the alleged offender will be approached with the intention of resolving the matter in a confidential manner.
- c. If the incident or the case reported does constitute sexual harassment of a higher degree the member will suggest taking it up for disciplinary action or with the agreement of the complainant, the case can be taken as a formal complaint.
- d. Once such complaints are dealt with, the FIP must inform the ASH Cell.
- e. The choice whether to deal with the complaint in the informal way or through the formal mechanism (whether the case constitutes sexual harassment of a higher or lower degree) should depend entirely on the complainant.

FORMAL COMPLAINTS OF SEXUAL HARASSMENT

- a. All formal complaints of Sexual Harassment have to be referred to the ASH Cell in consultation with FIPs or any other staff, are not empowered to penalize GAMANA staff.
- b. Based on the provisions of the 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013', the GAMANA ASH Chair will constitute an Internal Complaints Committee (ICC), whenever a formal complaint of sexual harassment is received in order to conduct an enquiry.
- c. The Chairperson of ASH cell will be the presiding officer of the ICC.

PROCESS OF INQUIRY

- a. The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The ICC/ Enquiry Committee (EQC) will be set up immediately after receiving the formal complaint of sexual harassment. The ASH Cell is responsible for setting up the ICC/EQC with support from the GAMANA Management.
- b. The ICC/EQC has to investigate and submit report to ASH Cell within 6 weeks. The ASH Cell will have to decide on recommendations and forward it to the Director within 2 weeks of receiving report from EQC.
- c. In case of exceptional circumstances, the time limit for investigation may be extended by the ASH Cell. The ASH Cell has to inform the Director, who will then inform both the complainant and accused.
- d. Upon receiving a formal complaint, the Committee shall ask the complainant to prepare a detailed statement of incidents if written complaint is sketchy. A statement of allegations & witnesses (as far as possible to mention names) will be prepared by the Committee in consultation with the complainant.



- e. A copy of the complaint carrying the statement of allegations, supporting documents & names and addresses of the witnesses will be shared with the respondent within a period of seven working days or earlier, by the ICC.
- f. The respondent will be asked by the ICC, to submit to the ICC, a reply to the Complaint along with the respondent's list of documents & names and addresses of witnesses within a maximum period of 10 working days from the date of receipt of the complainant's complaint & documents by the respondent.
- g. The ICC will enquire into the complaint in accordance with the principles of natural justice.
- h. The ICC will have the right to terminate the inquiry proceedings or to take an ex-parte decision on the complaint if the complainant or the respondent fails to be present without sufficient cause for three consecutive hearings convened by the Chairperson of the ICC. However, the aforesaid order to terminate the inquiry proceedings or to take an ex-parte decision will not be passed without giving a notice in writing at least 15 days in advance to party/parties concerned.
- i. The statements and other evidence obtained in the inquiry process will be considered confidential materials.
- j. An officer in the organization could be designated to provide advice and assistance to each party if requested by either of them. Similarly, the complainant and the accused will have the right to be represented or accompanied by a member of staff of GAMANA, a friend or a colleague.
- k. The parties concerned will not be allowed to bring in any legal practitioner to represent them in their case at any stage of the inquiry proceedings before the ICC.
- l. The Committee will organize verbal hearings with the complainant and the accused.
- m. The Committee will take testimonies of other relevant persons and review the evidence whenever necessary. Care should be taken to avoid any retaliation against the witnesses by giving necessary protection.
- n. The Committee will take its decision after carefully reviewing the circumstances, evidence and relevant statements in all fairness.
- o. If the accused, being provided fair opportunity to participate in the inquiry and defend him/her fails to participate in the inquiry, the Committee may conduct the inquiry exparte.
- p. The Committee will ensure confidentiality during the inquiry process.
- q. In the course of investigating any complaint of sexual harassment, the ASH Cell shall ensure that the principles of natural justice are adhered to namely:
 - ✚ Both parties shall be given reasonable opportunity to be heard along with witnesses
 - ✚ and to produce any other relevant documents before the ASH Cell;
 - ✚ Upon completion of the investigation, both parties, will be informed of the results of the investigation.
- r. Documents which form part of the official record shall also be given to the complainant
- s. if need be.
- t. The ICC shall be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimised nor discriminated against while dealing with a complaint of sexual harassment. In this regard the ASH Cell shall also have discretion to make appropriate interim recommendations vis-à-vis an accused person pending the outcome of a complaint including suspension, transfer, leave, change of office etc. The complainants should have the option to seek transfer of the perpetrator or seek his/her own transfer.
- u. In the event, the ICC determines that sexual harassment has occurred, it will make appropriate recommendations as to necessary action to be instituted to remove the offensive conduct and, where appropriate, to institute disciplinary action. The complainant's views may be taken into consideration for this purpose.



- v. Given that GAMANA views any finding of sexual harassment a serious violation of human rights, if it is determined that inappropriate conduct has been committed by a staff, appropriate action will follow under the circumstances. Such action may range from counselling to termination from employment, and may include such other forms of disciplinary action the ICC deems appropriate under the circumstances. The ICC will be guided by HROD procedures for disciplinary action within GAMANA.
- w. If the aggressor is guilty of serious sexual harassment or has repeatedly (second time) committed acts of SH then s/he will be dismissed. In appropriate cases s/he may also be required to pay monetary compensation. If the offence is of the serious nature (which involves challenging modesty of the complainant or any kind of molestation), then the complaint shall be lodged under Section 354 of the IPC with the consent of the complainant.
- x. Sexual harassment by line managers or by colleague senior to the victim, then such acts will be considered to be very serious and will attract higher penalties.
- y. Interim relief to the woman will be assured under all circumstances.
- z. However, if the ASH Cell finds the allegations made by the complainant are false and malicious, the complainant will be subjected to disciplinary action which may include; transfer, reprimand, suspension or dismissal as per GAMANA HR Policy."

8. SEXUAL HARASSMENT AND GAMANA

GAMANA is responsible for ensuring that its partners have a commitment to a Sexual Harassment free working atmosphere within their organizations i.e. the partner organizations. While respecting the autonomy of the partner organization, GAMANA will play a facilitating role within the partner organization, by:

- a. Creating an Sexual Harassment free climate
- b. Helping in the formation of ASH Cell
- c. Ensuring that complaints of SH are heard and investigated.

In the case where staff of GAMANA has made an allegation of sexual harassment against a member of a Partner, the GAMANA ASH Cell will constitute the ICC/EQC on which the Partner will be given the option to be represented.

In the case where staff of the Partner has an allegation of sexual harassment against a member of the Partner, the ASH Cell will support the Partner itself to set-up the necessary EC and resolve the matter.

9. THIRD PARTY HARASSMENT

Where SH occurs as a result of an act or omission by any third party or outsider, GAMANA will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action as prescribed by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013'.

10. STATUTORY COMPLIANCE / MANAGEMENT OBLIGATIONS

- 1. Management of GAMANA shall provide all necessary assistance for the purpose of ensuring full, effective and prompt implementation of this policy. It shall further be bound by the decisions of the ASH Cell and shall implement the same expeditiously.
- 2. The support to be provided to ASH Cell includes:
 - a. Secretarial and administrative support for training and other preventive actions.
 - b. Helping to set up EQCs
 - c. Secretarial support during SH enquiries
 - d. Adequate financial resources for all activities
 - e. Time planning for members of ASH Cell, especially GAMANA staff
 - f. Prompt / timely action based on the recommendations of the ASH Cell

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- g. Proper fund allocation to support (related to) the Enquiry Committee.
3. The responsibility for preventive activities (regarding SH) rests with the Management of GAMANA.
4. The responsibility of taking prompt action on ASH Cell recommendations lies with the Director of GAMANA. Recommendations of the ASH Cell shall be binding on the Director. However, if the Director has a difference of opinion he/she may ask the ASH Cell to review its decision. The final decision will, however, be that of the ASH Cell. Action on ASH Cell recommendations should be taken within 2 weeks of the recommendation being made and reported back in four weeks to the ASH Cell.
5. GAMANA is expected to provide adequate protection to ASH Cell and Enquiry Committee members in case of threats and any retaliation. Support and protection must also be provided (by Management) if matters go to Court. Management should in all cases defend the ASH cell & the complainant.
6. In the event the conduct complained of amounts to a specific offence under the Indian Penal Code or under any other law in existence, the ASH Cell, subject to the wishes of the complainant, shall take appropriate action in making a complaint with the appropriate authority. The GAMANA management will have to provide all manner of support required in such instances.
7. The GAMANA Management will actively assist and do all that is necessary to ensure the safety of a complainant in the office premises or otherwise in respect to any duties/activities performed in connection with her work, which take place outside office premises.
8. The GAMANA Management has to ensure that the ASH Cell and Enquiry Committee retain their autonomy and may work unhindered.
9. The proceedings under this policy shall not be stalled or postponed merely because the Complainant is proceeding against the accused under any other provision of law.
10. The provisions of this policy shall not restrict the powers of the Management or the complainant to proceed against the alleged offender for any other misconduct or other legal remedies.

11. ANNUAL REPORTS

- a. The ASH Cell will have to prepare an annual report every year containing the following details:
- b. No. of complaints of sexual harassment received in a particular year.
- c. No. of complaints of sexual harassment disposed-off during a particular year.
- d. No. of cases pending for more than 90 days.
- e. No. of workshops/ awareness programmes conducted for prevention of sexual harassment at workplace.
- f. Nature of action(s) taken by the employer.

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