

Prevention of Sexual Harassment at the Workplace Guidelines for Conservation Initiatives Personnel

Conservation Initiatives (CI) is committed to providing a healthy, safe and harassment-free workplace for its employees and personnel. We strongly adhere to legal guidelines including those laid out in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as , ‘POSH Act, 2013’). Further, we strive for best practices that extend above and beyond legal guidelines where possible and appropriate. Our policy is gender-neutral and aims to safeguard personnel against sexual harassment at the workplace irrespective of gender.

CI advocates zero-tolerance towards sexual harassment and will not take kindly to any acts or conduct of sexual harassment by or against any of its personnel irrespective of place or person; decisions on acts or conduct will be assessed with this perspective in mind.

1. CI personnel

This policy is applicable to all CI personnel. For the purposes of this policy, all consultants, employees, members, affiliates, and field guides, whether engaged part-time or full-time, will be considered as CI personnel. This includes those who fall under the ambit of the definition of ‘employee’ under Section 2(f) of the POSH Act, 2013.

2. CI workplace

For this policy, workplace includes “any place visited by CI personnel arising out of or during the course of employment,” as provided by Section 2(o) of the POSH, Act, 2013. CI understands the nature of its work is such that the workplace may not always be restricted to a typical office space, and the scope of our anti-sexual harassment policy is accordingly broadened to include all places that personnel find themselves in due to CI work. The ultimate authority to decide if an act or conduct of sexual harassment is within the scope of the working environment of CI rests with members of the CI POSH Internal Committee (POSH IC; details of which are provided below).

3. Defining Sexual Harassment

Sexual harassment has been defined as any unwelcome act or behaviour (whether direct or by implication) such as any physical contact or advances, verbal or non-verbal conduct or behaviour, any demand for sexual favours, or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature, as detailed further below.

The following list is an indicative, but non-exhaustive, list of acts and conduct that can be termed sexual harassment.

- 3.1. Unwelcome and/or unwanted physical contact or advances of sexual nature including touching, assault, impeding or blocking movements, forcible touching and molestation;
- 3.2. Unwelcome and/or unwanted verbal communication of a sexual nature, including pestering for dates or invitations, unwanted sexual suggestion, leering, sexually-coloured remarks, unwelcome sexual gestures or jokes including unwelcome or derogatory remarks or comments about a person's body or dress, or displaying sexual objects or pictures;
- 3.3. Unwanted and/or unwelcome written communication of a sexual nature through letters, notes or invitations, in hard or soft copy, or on any social media including publicizing pornography;
- 3.4. Demands or requests for sexual favours or implying preferential treatment in exchange for sexual favours; and
- 3.5. Making or threatening retaliation after a negative response to sexual advances and reporting of unwelcome advances or conduct, and suggesting or implying that failure to accept sexual advances can have adverse effects on the recipient's career or life.

It will be within the power of members of the POSH IC to judge whether any act or conduct amounts to "sexual harassment". This will be decided based on the nature of the act or conduct, and the circumstances under which the act or conduct took place.

4. POSH Internal Complaints Committee (POSH IC)

CI has set up and will regularly reconstitute its POSH IC, in accordance with the POSH Act 2013. The IC comprises a Presiding Officer, internal members and one impartial external expert member who is supportive of women's rights and causes, is knowledgeable about the POSH Act 2013 and related laws and guidelines and has expertise in the same. Membership and Terms of Reference of the POSH IC is annexed to these guidelines and will be reviewed at least once every three years. The quorum of the POSH IC is 3 members, including the external member.

The POSH IC is responsible for investigating complaints submitted to them; making recommendations for appropriate measures to be taken upon completion of their investigation; making recommendations to discourage and prevent sexual harassment at the workplace, including conducting regular trainings for CI personnel.

The POSH IC has the power to decide if a complaint lodged by a victim amounts to sexual harassment and has been sufficiently severe to have created a hostile working environment for the victim; and it has the right to decide if an act can be termed as sexual harassment at the workplace. The POSH IC, while investigating a complaint, has the same powers as vested in a civil court under the Code of Civil Procedure, 1908, as stipulated by the POSH Act, 2013. Complaints to the POSH IC will be made as per the process provided below.

5. Registering complaints

It is imperative that an act of sexual harassment be reported promptly. The more prompt the reporting of the complaint, the more authentically it can be investigated and acted upon. CI is committed to taking swift action upon receiving a complaint and to, subsequently, re-establishing a healthy and safe work environment.

CI recognises the sensitivity of matters attached to sexual harassment and will ensure that all details pertaining to the complaint be kept under strict confidence. Accordingly, the CI POSH IC will act within guidelines of strict confidentiality, to the extent practicable and appropriate.

Complaints must be submitted according to the following provisions:

- 5.1. Complaints can be submitted in writing to the POSH IC via its email id (provided in the Annexure), or via contacting any of its members (contact details provided in the Annexure). Complaints are to be lodged directly (in writing) by the aggrieved party.
- 5.2. If the aggrieved is unable to make a complaint in writing for some reason, their Supervisor, the Presiding Officer of the POSH IC, or any POSH IC member will render all reasonable assistance to the individual for making the complaint in writing.
- 5.3. A friend or colleague can also submit a complaint on behalf of the Complainant if the Complainant so requests and wishes for the same, or if the Complainant is unable to complain on their own and needs assistance.
- 5.4. Complaints should be lodged within a time period of **3 months** from the date of the last incident. However, exceptions can be made to this timeline at the discretion of the POSH IC, and the IC has the power to entertain complaints beyond the said three months period after convening a meeting and discussing the complaint on a case-by-case basis. A ceiling period to extensions will be applied and complaints shall not be considered beyond a period of six months from the date of the last incident.

Upon receiving the complaint, the POSH IC will conduct an investigation. The investigation should be completed within a period of **ninety days** of receipt of complaint, unless circumstances call for an extension of this period. During the investigation process, the POSH IC can recommend action such as paid leave or change in work responsibilities or workplace, to provide for a harassment-free workplace. All matters related to the investigation and processing of complaints will be kept strictly confidential.

On completion of the investigation, the POSH IC will provide a report and recommendations on disciplinary actions to be taken in response to the incident. These actions can range from the requirement of an apology, warnings, change in work responsibilities, workplace, or team, mandatory counselling, paid or unpaid leave, or termination of contract.

The POSH IC can also recommend disciplinary action against any person giving a false or untrue complaint should a degree of malicious intent be established such as providing intentionally forged or misleading testimony or deliberately withholding pertinent information.

CI Managing Committee and/or Trustees and/or Supervisors will take disciplinary action as listed above, based on the recommendation of the POSH IC.

6. Conclusion

All CI personnel must abide by CI's POSH policy and understand and accept that any transgressions or violation can lead to disciplinary action.

Conservation Initiatives reiterates that it strives to create a safe work environment and protect its personnel against any unwelcome conduct or behaviour, and has zero-tolerance for any form of sexual harassment.

ANNEXURE 1: Membership of the POSH-C

The POSH IC email address is: posh.ic@conservationinitiatives.org

The membership of the POSH IC from the period 1st Jan 2026 to 31st Dec 2029 is as follows.

1. Dr. Divya Vasudev (Presiding Officer)
email: vasudev.divya@gmail.com / divya.vasudev@conservationinitiatives.org
2. Mr. Ezra Rynjah (Internal Member & Convenor)
email: ezrynjah@gmail.com
3. Ms. Parvathi K. Prasad (Internal Member)
email: kprasad.parvathi@gmail.com
4. Mr. Rohan Sharma (Internal Member)
email: rohan.july2000@gmail.com
5. Mx. Badapbiang T. Dkhar (External Member)
Legal Consultant and Research Fellow, NLU-Meghalaya
email: badapbiangdkhar@gmail.com

The **Terms of Reference** for the POSH IC are as follows:

1. The POSH IC will meet virtually or physically at least once a year to review the work environment at CI.
2. The POSH IC will meet or confer as often as possible to deal with any complaints registered with it.
3. The POSH IC will deal with any complaints registered in a timely, just and fair manner, and provide recommendations for actions based on a thorough investigation.
4. The POSH IC will provide recommendations on improving the work environment at CI in line with the POSH Act 2013 and the spirit of ensuring a safe harassment-free workplace.
5. The POSH IC will maintain all complaints, investigations, and matters of CI affairs in strict confidence.
6. The POSH IC Presiding Officer will lead proceedings and take responsibility for ensuring the POSH IC is active and working.
7. The POSH IC Convenor will schedule meetings, set agendas in discussion with the Presiding Officer and maintain meeting minutes.
8. The POSH IC will maintain reports on an annual basis on meetings, trainings and complaints.