



PREVENTION OF SEXUAL HARASSMENT - POLICY

	Name	Designation & Function	
Approved By	Anushree Singh	Associate Director - HR	
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1	IC Members Updated	1-Apr-23	1.1
2	IC Members Updated	1-Jun-24	1.2

FOUNDATION TO EDUCATE GIRLS GLOBALLY

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1. Objective:

This policy is based on the 'THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013'.

Foundation to Educate Girls Globally (FEGG) is committed to providing a safe work environment and a culture that is devoid of any harassment.

This policy document provides guidelines for reporting sexual harassment against women at the workplace and the details of the internal procedures.

2. Applicability:

This policy is applicable to all part time, full time employees of FEGG and any other person who as per their contractual agreement with Foundation to Educate Girls Globally is in a role that requires them to report sexual harassment.

The policy is applicable to all the associates of FEGG irrespective of position/grade, including Payroll employees, temporary employees, trainees and associates on contract at its workplace or at client/assignment sites or working on a voluntary basis.

It also applies to all the visitors & vendors/suppliers/contractors and their representatives associated with FEGG & visiting any premises of FEGG, or whose premises our associates visit for work related activities.

The workplace includes :

- All offices, schools, camps, centers or other premises where FEGG's programs are conducted
- All FEGG related activities/events/meetings performed at any other site away from FEGG's premises
- Any place visited by the employees arising out of or during the course of employment including any transportation provided by FEGG for undertaking the journey.

3. Definition :

According to THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013, sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually coloured remarks, lewd or sexually suggestive comments, jokes, innuendoes, or gestures; or
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

While it is not easy to provide a complete list of the types of improper behaviour, to prevent sexual harassment at the workplace, the following circumstances, among other; if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- Quid pro quo sexual harassment
- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implied or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect her mental, physiological, emotional or physical health and safety.
- Observing, photographing, videotaping, or making other visual or auditory records of sexual activity or nudity, where there is a reasonable expectation of privacy, without the knowledge and consent of all parties; or
- Sharing visual or auditory records of sexual activity or nudity without the knowledge and consent of all recorded parties and recipient(s)
- Stalking

4. Responsibilities regarding Prevention of Sexual Harassment:

All employees of Foundation to Educate Girls Globally have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. Complaint mechanism and complaint committee

Constitution of Internal Complaints Committee will be as mentioned below:

- One Presiding Officer, 2-3 Members of the Committee and one Member from amongst NGO or association committed to the cause of women or a person familiar with the issues of sexual harassment or women cause.
- The quorum of three members are required for the proceedings to take place including the Presiding Officer.
- At least one-half of the total members of the IC will be women

An appropriate complaint mechanism in the form of **Internal Committee (IC)** has been formulated at Foundation to Educate Girls Globally for time-bound redressal of the complaint made.

Below are the details of IC committee/s:

Internal Committee Members	Email ID
Common ID (includes 04 IC presiding officers & CEO)	icc@educategirls.ngo

IC - Bihar		
Geetika Higgins - Presiding Officer	geetika.higgins@educategirls.ngo	+91 80083 77442
Sutapa Bhattacharya	sutapa.bhattacharya@educategirls.ngo	+91 98366 80197
Bhupendra Choudhary	bhupendra.choudhary@educategirls.ngo	+91 97995 54253
Gopal Kumar Singh	gopalkumar.singh@educategirls.ngo	+91 76178 36180

IC - Madhya Pradesh		
Vaijayanti Bagwe – Presiding Officer	vaijayanti.bagwe@educategirls.ngo	+91 99206 96230
Alka Singh	alka.singh@educategirls.ngo	+91 70328 19138
Mohit Pathak	mohit.pathak@educategirls.ngo	+91 75100 01165
Ranjeet Nath	ranjeet.nath@educategirls.ngo	+91 98181 07912

IC - Maharashtra (+Any other State where IC is not defined)		
Krati Tolani – Presiding Officer	krati.tolani@educategirls.ngo	+91 98280 32884
Shwetha Kamath	shwetha.kamath@educategirls.ngo	+91 99721 70654
Vikram Singh Solanki	vikram.solanki@educategirls.ngo	+91 99294 42299
Bineesh M	bineesh.mathai@educategirls.ngo	+91 81305 65770

IC - Rajasthan		
Naina Joshi - Presiding Officer	naina.joshi@educategirls.ngo	+91 87698 69608
Shivla Saxena	shivla.saxena@educategirls.ngo	+91 98801 35869
Abdur Rahman	abdur.rahman@educategirls.ngo	+91 96652 71857
Brajesh Kumar Sinha	brajeshkumar.sinha@educategirls.ngo	+91 80033 96997

IC - Uttar Pradesh		
Anushree Singh – Presiding Officer	anushree.singh@educategirls.ngo	+91 98197 81986
Christine Roberts	christine.roberts@educategirls.ngo	+91 97696 91707
Akhil Agarwal	akhil.agarwal@educategirls.ngo	+91 78209 50995
Nitin Kumar Jha	nitinkumar.jha@educategirls.ngo	+91 79743 33462

Tenure:

The term of the members of the IC will be for 3 years. On the expiry of the term of the members, a new committee will be formulated. In case of any vacancy arising out due to any reason, management will immediately fill the vacancy by nominating another person in place.

Any change in the composition of the team within the 3 years period will be communicated separately.

If any members are unavailable for an investigation, they may be replaced by any other IC-trained member with the approval of Head HR or CEO

The ICC is responsible for:

- Providing an internal mechanism for redressal in cases of sexual harassment
- Investigating every verbal or written complaint of sexual harassment
- Taking prompt and appropriate action against anyone violating the Educate Girls policy for sexual harassment

In accordance with Rules and Procedures laid down herein.

- Create awareness and discouraging and preventing employment-related sexual harassment
- Prepare and widely circulate in all its offices, the Educate Girls policy for sexual harassment

6. Procedures for resolution, settlement or prosecution of acts of sexual harassment:

FEGG is committed to providing a supportive environment to resolve concerns of sexual harassment. The complainant can bring their concern to the attention of the ICC for redressal of their grievances ***both verbally or giving a written complaint***. The IC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter. The immediate action taken by the IC against the harasser will depend and vary from case to case depending on the severity of the case.

A complaint of sexual harassment shall be reported or filed by the complainant ***within 90 days from the date of the incident***. This period may be extended in case of circumstances which prevented the complainant from filing the complaint within the stipulated time.

The Complaints Committee shall conduct such investigations in a timely manner and shall ***complete the inquiry within a period of 90 days*** from the date on which the inquiry is commenced.

Disciplinary Action

After completing the inquiry, the Internal Committee will submit its report with recommendations of the punishment or penalty to be imposed on the respondent if the charges are proved.

The punishment may include issuance of warning, transfer, withholding promotion/increments, suspension or termination of the respondent and/or payment of compensation.



All such actions will be taken within 30 days of receipt of report from the Internal Complaint Committee.

All such actions will be taken within **60 days** of receipt of report from the Internal Complaint Committee.

Complaints made with a false or malicious intent

The complaint of sexual harassment made by any complainant shall be taken up with utmost seriousness by FEGG. However, there shall be zero tolerance for any false accusation.

In case, the Internal Committee arrives at conclusion that the complaint of the complainant is unjustified, false, malicious or had raised the concern with ulterior motives or complainant knowing it to be false, produced forged or misleading documents, the Internal Committee may recommend the management to act against the complainant which may be subject to disciplinary action, up to and including termination.