



Tulsi Eye Hospital

A Quality Eye Care Provider
Member - "Vision 2020" The Right to Sight - India



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TULSI EYE HOSPITAL

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE (PoSH)

1. INTRODUCTION AND OBJECTIVE

Tulsi Eye Hospital (the "Organisation/Hospital/Employer") is deeply committed to creating and maintaining a respectful, healthy, safe, and productive work environment free from any form of discrimination and harassment. In alignment with our core values and statutory obligations, the Organisation/Hospital/Employer strives to provide equal opportunities and a harassment-free workplace to all individuals, enabling them to work with dignity and without fear of prejudice, gender bias, or sexual harassment.

This Policy is framed to prevent, prohibit, and effectively redress complaints of sexual harassment at the workplace. All personnel associated with the Organisation/Hospital/Employer are expected to uphold the highest standards of ethical conduct, treat everyone with respect, and strictly refrain from any unwelcome behaviour of a sexual nature or creating a hostile work environment.

Accordingly, this Policy has been framed with the intention of preventing Sexual Harassment at workplace, that includes prohibition and redressal of sexual harassment should it occur.

At Tulsi Eye Hospital (TEH), all employees are expected to uphold the highest standards of ethical conduct at the workplace and associated sites, and in all their interactions with all professional stakeholders. This means that employees have a responsibility to:

- Treat each other with dignity and respect
- Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.

2. SCOPE AND COVERAGE

This policy takes complete cognizance of the latest legislation by the Government of India "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013 and its rules notification published on December 9, 2013.

This policy applies to all Employees of Tulsi Eye Hospital, including those at the Vision Centre/s, project locations and meetings and events.

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Given the nature of our work in the prevention of visual impairment and blindness, protection under this policy extends fully to our personnel during field visits, community outreach initiatives, vision centres, and interactions at partner hospital premises.

This policy aims to provide a formal and robust redressal mechanism of appropriate support and remedial action, for victims of sexual harassment and ensure they receive the necessary support and assistance.

This Policy is subject to the provisions of the PoSH Act, 2013. In case of any contradiction or gap between this Policy and the statutory law, the PoSH Act shall override this Policy, and the minimum statutory standards shall apply automatically.

While TEH is bound to provide medical care to all, sexual harassment of staff by patients or their attendants will not be tolerated. The IC will investigate such matters, and management will take appropriate administrative or legal action, including security intervention or filing a police report, while ensuring patient transfer protocols are followed if medical emergencies exist.

3. DEFINITIONS

- a. **Sexual Harassment:** Includes any one or more of the following unwelcome acts or behaviours (whether directly or by implication):
- o Physical contact and advances.
 - o A demand or request for sexual favours.
 - o Making sexually coloured remarks, vulgar jokes, or inappropriate communications via gesture, text, email, or social media.
 - o Showing pornography or sexually explicit material.
 - o Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.
 - o Implied or explicit promises of preferential treatment, threats of detrimental treatment, or creation of an intimidating or hostile work environment.

It is the **impact** and irrespective of the intent that matters.

- b. **Aggrieved woman:** Any woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent. This includes female staff, community beneficiaries, volunteers, and visitors.
- c. **Employee:** Anyone employed with TEH for any work on a permanent, temporary, part-time, ad-hoc, daily-wage or voluntary basis. This explicitly encompasses full-time staff, Nurses , Ayya Mavshi , Ward boy2121 optometrists, Vision Centre technicians, ophthalmic assistants, community health workers, outreach coordinators, laboratory technicians, administrative and security staff, field volunteers, contractual housekeeping personnel, contract workers, probationers, trainees, interns, consultants, and individuals working on a voluntary basis.
- d. **Employer:** Any person who is responsible for the management, supervision and control of the workplace. Management includes the person or board or committee responsible for formulation and administration of policies for TEH.



- e. **Respondent:** The person against whom a complaint of sexual harassment has been filed by the aggrieved woman.
- f. **Workplace:** All offices, hospitals, vision centres, and premises used or rented or managed or controlled by Tulsi Eye Hospital.
 - a. Any partner hospital premises, community screening camps, or field locations visited by personnel during the course of employment.
 - b. Any vehicle or mode of transportation provided or utilized for undertaking work-related travel.
 - c. Any events organised by TEH or represented by TEH employees.
 - d. Overnight field accommodations, transit vehicles, and make shift camp site offices.
- g. **Extended Workplace:** In alignment with the statutory "extended workplace" doctrine, the workplace explicitly extends to any remote location from which an employee operates, including, but not limited to, their home during Work from Home (WFH) arrangements, co-working spaces, donor meetings, social and official events organised by TEH, any temporary remote setup or any other place which is visited by employees as part of their scope of work.
- h. **Digital and Virtual Spaces:** The workplace encompasses all digital platforms, virtual environments, and communication channels utilized for organizational operations. This includes, but is not limited to, virtual meeting platforms (e.g., Zoom, Microsoft Teams, Google Meet), official messaging applications (e.g., WhatsApp, SMS), organizational emails, and any other collaborative online space. This would be applicable to working and non-working hours.
- i. **Special Educator:** A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

4. GUIDELINES FOR VIRTUAL MEETINGS AND REMOTE WORK

In hybrid working, virtual screenings tracking, and remote administrative coordination, all personnel must maintain professional boundaries online. Sexual harassment in a virtual environment carries the exact same disciplinary weight and penalties as physical misconduct.

A. Prohibited Virtual Conduct

Sexual harassment in virtual meetings and Work from Home setups includes, but is not limited to:

- i. **Inappropriate Visual Conduct:** Displaying, sharing, or accidentally broadcasting sexually explicit or suggestive wallpapers, pictures, or backgrounds during a video call or screen-share.
 - a. Presenting oneself on a video call in an inappropriate state of dress or attire that violates professional decorum.
 - b. Insisting without operational justification that a colleague turn on their video camera when they have expressed discomfort or are outside of standard working hours.



- ii. Inappropriate Verbal and Written Digital Conduct:
 - a. Making sexually coloured remarks, double-entendres, vulgar jokes, or comments regarding a colleague's physical appearance, attire, or domestic setting visible on camera.
 - b. Sending unwelcome, flirtatious, or sexually suggestive text messages, private chat messages, emojis, or media during or after official virtual meetings.
- iii. Intrusive Behaviour and Stalking:
 - a. Repeatedly contacting a colleague via video or voice call outside of professional hours without an operational emergency, resulting in an intimidating or hostile digital work environment.
 - b. Taking unauthorized screenshots, recording video snippets, or saving photos of colleagues during virtual sessions for personal use or non-professional circulation.

B. Protocols for Virtual redressing

- i. Digital Evidence Collection: Complainants and the Internal Committee (IC) are empowered to utilize digital evidence, such as meeting recordings, system logs, screenshots of chats, and email trails, as admissible evidence during the inquiry process.
- ii. Interim Relief Online: During the pendency of a virtual harassment inquiry, interim relief may include blocking the Respondent's access to specific shared digital workspaces, altering project-reporting channels online, or mandating that the Respondent refrain from entering virtual meetings where the Complainant is present.

5. INTERNAL COMMITTEE (IC)

In compliance with the law, TEH has constituted an Internal Committee (IC) to handle all matters related to POSH.

A. Composition

The Committee comprises a Presiding Officer (a woman employed at a senior level), minimum two members from among employees committed to the cause of women or social work, and one External Member from an NGO/association or individual familiar with issues relating to sexual harassment.

The names and contact details of the respective IC members, along with the penal consequences of sexual harassment, are physically displayed in prominent locations in the Hospital and Vision Centres run by TEH. These are also available in Annexure 1 of this document.

B. Tenure and Vacancies

- i. The Presiding Officer and every member shall hold office for a period not exceeding three years from the date of their nomination.
- ii. A member may be removed for any violations of this policy as provided in Section 4(5) of the POSH Act, 2013.
- iii. Any vacancy arising due to resignation, cessation of employment, or removal shall be filled via fresh nomination within statutory timelines.



6. GUIDELINES AND PRINCIPLES

- i. **Strict Confidentiality:** The identity and addresses of the Complainant, Respondent, and witnesses, including the complaint, supporting documents submitted or any information regarding conciliation / inquiry proceedings and recommendations, must be kept strictly confidential. It shall not be published or disclosed publicly. A violation of confidentiality will attract disciplinary action as per organisational rules. Stringent confidentiality will be maintained. There shall be no breach of confidentiality in maintenance of all records and documentation with regard to complaint/s, conciliation / inquiry proceedings, etc.
- ii. **Principles of Natural Justice:** The IC will strictly adhere to the principles of natural justice. Both parties will be given a fair opportunity to submit their statements.
- iii. **Non-Retaliation:** Tulsi Eye Hospital maintains a zero-tolerance policy for retaliation. Any attempt to penalize, intimidate, or discriminate against anyone for reporting sexual harassment or cooperating with an investigation will be treated as a major disciplinary misconduct.

7. REDRESSAL PROCESS

Step 1: Submission of Complaint

- i. A written complaint must be submitted to the IC within three months from the date of the incident (or the last incident in case of series of incidents).
- ii. The IC may extend this timeline by another three months, for reasons recorded in writing, if satisfied that extraordinary circumstances prevented the individual from filing earlier.
- iii. Complaints can be emailed to (Email id to be inserted) or submitted physically in a sealed envelope to any IC member which shall be duly acknowledged by the said IC member.
- iv. Complaints can be lodged directly on the SHE Box Portal, the link of which is available on the TEH website.
- v. If the Aggrieved Woman cannot file a complaint due to physical/mental incapacity or death or otherwise, her legal heir or such other person as prescribed by the PoSH Act may file a complaint.
(The formats are provided in Annexure 2 of this document).
- vi. **Aggrieved woman / Employee with disability:** The Employer recognizes that certain intellectual, developmental, or communication disabilities require specialized expertise. To ensure fair access to justice, the IC is empowered to:
 - a. Accept a certified Special Educator or a registered Rehabilitation Practitioner (recognized under the Rehabilitation Council of India) who is currently working with or supporting the employee may file the formal POSH complaint on the employee's behalf.
 - b. The Special Educator shall serve as an official intermediary to:
 1. Translate the IC's questions into accessible language, visual aids, or signs.
 2. Interpret the aggrieved woman's responses, gestures, or behavioural cues accurately for the record.



- c. If the employee does not have an independent Special Educator, the Employer shall onboard and bear the expenses of a certified external Special Educator within 48 hours of receiving the grievance.

Step 2: Conciliation

- i. Before initiating an inquiry, at the explicit request of the Complainant, the IC may take steps to resolve the matter through conciliation.
- ii. No monetary settlement can be made the basis of conciliation.
- iii. If a settlement is reached, the IC will record it, forward it to Employer for implementation, and close the matter without further inquiry.
- iv. The IC, shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.

Step 3: Inquiry

- i. If conciliation is not requested, or any of its terms are violated, the IC will initiate a formal inquiry.
- ii. The Respondent will be served a copy of the complaint along with the supporting documents submitted within 7 days of receipt.
- iii. The Respondent must submit a formal reply along with supporting documents and list of witnesses along with their names and contact details within 10 working days.
- iv. A minimum of three IC members, including the Presiding Officer, must be present for hearings.
- v. Neither party is permitted to bring a legal practitioner at any stage of the proceedings to represent them.
- vi. The inquiry must be completed within 90 days from the receipt of the complaint.

vii. Interim Relief (During Pendency of Inquiry)

On a written request from the Complainant, the IC may recommend interim relief to the Employer, including:

- a. Transferring the Complainant or Respondent to a different team, project, or office location.
- b. Granting paid leave to the Aggrieved Individual for up to three months (in addition to their regular leave entitlement).
- c. Restraining the Respondent from supervising or reporting on the work performance of the Complainant.
- d. Granting such other relief to the aggrieved woman as may be prescribed in the service rules.

Step 4: Inquiry Report and Action

- i. The IC will issue its final written report within 10 days of completing the inquiry to the Employer, the Complainant and the Respondent.
- ii. If allegations are not proved: The IC will recommend that no action is required.
- iii. If allegations are proved: The IC will recommend disciplinary action to the Employer, which can include:
 - a. Written apology, formal warning, or reprimand.
 - b. Suspension without pay, withholding of increments/promotions, or termination of services.
 - c. Undergoing a counselling session or carrying out community service.



- d. Deduction from the Respondent's salary to compensate the Complainant as per provisions under Section 15 of the PoSH Act.
- iv. The Employer must fully implement the IC's recommendations within 60 days and submit a report of the implementation to the IC.

8. MALICIOUS COMPLAINTS

If the inquiry establishes that a complaint was filed with malicious intent or knowing it to be false, the IC may recommend suitable disciplinary action against the Complainant. However, a mere inability to substantiate a claim or lack of adequate proof does not equate to a malicious complaint.

The malicious intent on part of the Complainant shall be established only after an inquiry in accordance with the procedure prescribed, before any action is recommended.

9. APPEAL

In the event that either the complainant or respondent is aggrieved from the recommendations made by the IC or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by the law, within a period of ninety days of the recommendations of IC submitting the report to Employer.

10. RIGHTS AND DUTIES

A. Rights of the Complainant

- i. An empathetic attitude from the IC so that she can state her grievance in a fearless environment.
- ii. A copy of the statement along with all the evidence and a list of witnesses submitted by the respondent.
- iii. Keeping her identity confidential throughout the process.
- iv. Support, in lodging FIR in case she chooses to lodge criminal proceedings.
- v. In case of fear of intimidation from the respondent, her statement can be recorded in absence of the respondent.
- vi. Right to appeal, in case, not satisfied with the recommendations/findings of the Internal Committee.

B. Rights of the respondent

- i. A patient hearing to present his/her case in a non-biased manner.
- ii. A copy of the statement along with all the evidence and a list of witnesses submitted by the complainant.
- iii. Keeping his/her identity confidential throughout the process.
- iv. Right to appeal in case not satisfied with the recommendations/findings of the Internal Committee.

9. ROLES AND RESPONSIBILITIES

A. Employees and Volunteers

- i. Uphold a respectful workplace culture aligned with the values of Tulsi Eye Hospital.



- ii. Cooperate fully and truthfully with the IC if called upon as a witness or party to an inquiry.
- iii. Maintain strict confidentiality regarding any sensitive matters witnessed or discussed.

B. Managers and Project Leads

- i. Ensure that field staff, vision centre personnel, and community coordinators are aware of this policy.
- ii. If an employee or field worker verbally reports harassment, encourage them to put it in writing and immediately escalate it to the IC.
- iii. Ensure zero tolerance for harassment and aggressively prevent any form of retaliation within their teams.

C. Human Resource

Human Resource team members should:

- i. Make information, policies and procedures available to employees via the Web, Human Resources and the management.
- ii. Take cognizance of the written complaint and bring the complaint immediately to the IC and provide all kinds of support for the further investigations as a part of inquiry process.
- iii. Ensure that employees and stakeholders are communicated properly about TEH's POSH policy.
- iv. Carry out all corrective measures and remediation established in the final decision.
- v. Set an example of proper and appropriate workplace behaviour and ethical standards in line with appropriate code of conduct.

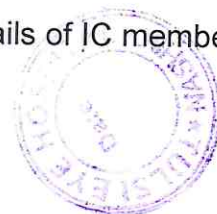
D. Internal Committee

IC members have the following responsibilities:

- i. To be fair while making the assessment of the situation, investigation and giving the verdict.
- ii. Conduct the inquiry process and recommend appropriate actions as per the process outlined in this document in line with the statutory requirements applicable.
- iii. Inform the parties involved in the inquiry proceedings well in time and in writing.
- iv. Follow the principles of natural justice and treat the complainant, respondent, witnesses and related persons to the inquiry with dignity and respect.
- v. Submit to the Employer and District Officer an annual report comprising details of all cases and actions taken as per the provisions of the PoSH Act.
- vi. Keep disclosed information as confidential. Handle information in a discreet manner.
- vii. If an employee faces sexual harassment outside of the company work and work premises, provide them with the appropriate assistance.
- viii. Set an example of proper and appropriate workplace behaviour and ethical standards.

E. The Employer

- i. Provide a safe working environment at workplace, extended workplace, digital and virtual workplaces.
- ii. Prominently display the names and contact details of IC members at all offices.



- iii. Conduct regular POSH sensitization workshops and awareness programmes for all staff and orientation sessions for IC members.
- iv. Monitor compliances of the PoSH policy and Act at regular intervals Fulfill all its duties as enlisted under Section 19 of the Posh Act.

10. TIMELINES AND PENALTIES AS PER THE ACT AND RULES AT A GLANCE

Sr. No.	Particulars	Timelines / penalties
1	Submission of Complaint	Within 3 months of the last incident
2	Notice to the Respondent	Within 7 days of receiving copy of the complaint
3	Completion of Inquiry	Within 90 days
4	Submission of Report by IC to employer	Within 10 days of completion of the inquiry
5	Implementation of Recommendations	Within 60 days
6	Appeal	Within 90 days of the recommendations
7	Breach of confidentiality	Penalty as per service rules and in the absence of service rules, Rs. 5000/- shall be recovered from the person.
8	Failure to constitute Internal Committee, act upon the recommendations of the Internal Committee, file annual report to the District Officer, contravening/attempting to contravene/abetting contravention of Act or Rules	Employer will be liable to pay penalty up to Rs. 50,000/-
9	Repeating breach of Act or Rules	Employer will be liable to twice the punishment or higher punishment if prescribed under any other law for the same offence. Cancellation / withdrawal / non-renewal of registration / license required for carrying on the organisation/employer or activities.
10	Submission of annual report (calendar year) to employer and District Officer	31 st January of every year for the preceding year

11. AMENDMENTS

Tulsi Eye Hospital reserves the right to amend this policy to stay aligned with updates to statutory laws, national rules, or judicial directives regarding workplace safety and women's protection.



ANNEXURE 1: LIST OF IC MEMBERS

Sr.	Names	Position	Contact Details
1	Dr.Vaishali Phadke	Presiding Officer	Email id: drvaishaliphadke1@gmail.com Mob. No.: 9423964465
2	Ms. Jyoti Kadam	Member	Email id : jyotinkam1987@gmail.com Mob No: 8623936200
3	Adv. Usha Yeole	External Member	Email id: adv.ushayeole@gmail.com Mob. No.: 9810685676
4	Ms. Hema Palande	Member	Email id : hemam.palande@gmail.com Mob NO : 9890743245
5	Ms.Meena Janjire	Member	Email id : meenajanjire1234@gmail.com Mob No : 8999716208
6	Mr. Philip Awwale	Noddle officer	Email id: philip1_id@yahoo.com Mob. No.: 9420366956
7	Mr.Dyaneshwar Kadam.	Member	Email id:dkk_outreach@tulsieyehospital.org Mob: 9860373693

Vision Centre/s

Sr.	Names	Position	Contact Details
1			
2			
3			
4			



1. Details of Aggrieved Woman

Name	Designation	Division and Department	Contact Numbers (Landline and Mobile)	Office Address

2. Details of Complainant (in case the Complainant is not the Aggrieved Individual)

Name	Relationship with Aggrieved Woman	Contact Numbers (Landline and Mobile)	Address

3. Details of respondent alleged to have engaged in sexual harassment

Name	Designation	Division and Department	Contact Numbers (Landline and Mobile)	Office Address

4. Details of the incident(s)

Sr. No.	Nature/Description of incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses if any

5. Has a report regarding these incidents been filed with any other agency? Yes () No ()
If yes, with whom?

6. Additional information and comments if any

Signature of aggrieved woman	Date
Signature of Complainant (in cases where it is not the aggrieved woman)	Date

