

**NATIONAL BANK FOR FINANCING INFRASTRUCTURE AND DEVELOPMENT**

**POLICY ON**  
**SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION,**  
**PROHIBITION AND REDRESSAL)**

June 2026



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## 1 Preamble

- 1.1 The Institution is committed to ensure a safe and secure work environment, so that our employees can deliver their best, without inhibition. Bank provides equal opportunity and is committed to create and maintain a work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. Any act of sexual harassment at workplace or other than workplace, if involving employees, is a grave offence and needs to be prohibited & prevented with appropriate measures as a matter of Policy. Sexual harassment is a serious offense that can destroy human dignity and violates the right to gender equality, the right to 'life and liberty', and the fundamental right 'to practice any profession or to carry out any occupation, trade, or business.' It is an act amounting to misconduct in employment.
- 1.2 The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Sexual Harassment Act") has been published in the Gazette of India on 23rd April 2013. The Act makes it mandatory for the employers not only to prevent and prohibit sexual harassment at workplace, but it also provides employees with an impartial grievance redressal mechanism and regulations as per the requirement of the Act.
- 1.3 In pursuant to the above and in compliance with the requirement of the Act, a policy has been formulated along-with the guidelines for prevention, prohibition and redressal of matters & complaints related to sexual harassment of women at workplace in the Institution. Bank through this Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women besides complying with requirements of Anti Sexual Harassment Law intends to translate its ethos of zero tolerance to sexual harassment into action. The policy is known as 'Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy of the Institution.'

## 2 Purpose

The purpose of this policy is:

1. to create an environment free from sexual harassment
2. to prohibit, prevent and deter commission of sexual harassment.
3. to provide protection against sexual harassment to women at workplace
4. to provide a platform for redressal of complaints and grievances against sexual harassment
5. to provide safeguards against false or malicious charges



### **3 Applicability**

This policy extends to all the employees (whether in the office premises or outside while on duty) of the Institution, whether the incident has occurred during or beyond office hours. Where sexual harassment occurs to an employee of the Institution as a result of an act by a third party or outsider while on official duty, the Institution will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

This Policy is applicable to complaints of sexual harassment by women, who are employed in permanent / temporary / on adhoc / daily wage basis, including a contract worker, whether employed by the Bank directly or through a contractor, probationer, trainee, apprentice or co-worker or any other woman who has been sexually harassed by any official of Bank at workplace of the Bank.

### **4 Scope**

This Policy within its scope extends to prohibition, prevention of sexual harassment of women and redressal of complaints of sexual harassment at the workplace.

### **5 Definition of Sexual Harassment**

5.1 The definition of sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely.

1. Physical contact and advances; or
2. Demand or request for sexual favours; or
3. Making sexually coloured remarks; or
4. Showing pornography; or
5. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

5.2 Apart from the above-mentioned acts of Sexual Harassment, the following circumstances, if they occur or are present in relation to or connected with the above act or behaviour of sexual harassment may amount to sexual harassment:

1. Implied or explicit promise of preferential treatment in employment; or
2. Implied or explicit threat of detrimental treatment in employment; or
3. Implied or explicit threat about present or future employment status; or
4. Interference with work or creating an intimidating or offensive or hostile work environment; or
5. Humiliating treatment likely to affect her health or safety.



**6 Abbreviations and definitions**

Below is the list of abbreviations, used in this document:

- (a) "Act" means the National Bank for Financing Infrastructure and Development Act, 2021
- (b) "Aggrieved woman" means a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent at workplace.
- (c) "Board" means the Board of Directors constituted under Section 6 of the Act.
- (d) "CDA" means National Bank for Financing Infrastructure and Development (Conduct, Discipline and Appeal) Procedure, 2024 (hereinafter referred to as "CDA").
- (e) "Disciplinary Authority" means the authority competent under this CDA, as set out in Schedule-I of CDA, to impose any of the penalties specified in this CDA on a Staff Member.
- (f) "EVP" means Executive Vice President of the Institution.
- (g) "Institution" means the National Bank for Financing Infrastructure and Development
- (h) "Employee" means a person employed at a workplace for any work on regular, temporary, on deputation or secondment, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- (i) "HR" means Human Resources Department of the Institution.
- (j) "HRC" means Human Resources Committee, an internal committee of the Institution constituted by the Board to assist in the administration of operational matters in relation to Human Resources.
- (k) "NaBFID" means the National Bank for Financing Infrastructure and Development



- (l) "Nomination and Remuneration Committee" or "NRC" means the Nomination and Remuneration Committee of the Board constituted under sub-section (1) of Section 15 of the Act
- (m) "Respondent" means a person against whom a complaint of sexual harassment has been made by the aggrieved woman.
- (n) "Workplace," in addition to the place of work, also includes any place visited by the employee in any social, business or other meetings, seminars, workshop or functions arising out of or during the course of employment including transportation provided by the employer for undertaking such journey and
- (o) "WTD" means the wholetime directors on the Board of the Institution.

## 7 Prohibition of sexual harassment of women at Workplace

- a Sexual harassment at any workplace in the Bank is prohibited and any violation or breach of the prohibition of sexual harassment shall invite disciplinary action against the violator. Bank further reserves its right to take such appropriate criminal and civil action as may be required against the violator as per the law of the land.
- b Prohibition of sexual harassment equally applies to relations between superiors and subordinates and vice versa, as well as between peers. Any incident of sexual harassment will be viewed seriously. A complaint or report of sexual harassment will be immediately investigated, and appropriate action will be taken against the erring official.

## 8 Constitution of Internal Committee (IC)

The Internal Committee (IC) will be constituted to take up and inquire into cases of sexual harassment and gender discrimination. The committee is presently constituted treating the Institution as one Administrative Unit based at Mumbai. Subsequent to setting up of the Institution's offices at other geographical areas (i.e., apart from Mumbai), existing committee can be extended to cater to the same, if required or wherever possible, a separate Internal Committees may be constituted.

8.1 IC will comprise a minimum of four members as under:

- i. A Presiding Officer, who shall be a woman at a senior level at workplace amongst the Executive Vice President / Vice President.

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.



- ii. Not less than two members from amongst the employees preferably committed to the cause of women/ having experience in social work/ having a legal background.
- iii. One member from an NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment preferably (a) a woman with at least five years of experience in the field of social work or (b) a person who is familiar with labour, service, civil or criminal law. One member shall preferably be from Scheduled Caste/ Schedule Tribe category/ Other Backward Class/ minority. The member secretary should preferably be a female.
- iv At least one-half of the total members of the constituted IC will be women.

- 8.2 The member of NGO shall be paid fees or allowance for holding proceedings of the IC by the Institution. The fee will be determined by the HRC based on expenses on conveyance, out of pocket expenses and luncheon expenses etc.
- 8.3 Any member of the IC if found convicted or accused of any offence under any law or punished under disciplinary proceedings/disciplinary proceeding pending/contemplated or abused his position in any manner, will be disqualified.
- 8.4 The members of IC will hold office for a period of 3 years from the date of nomination.
- 8.5 In conducting the inquiry, a quorum of minimum three Members of the constituted committee including the Presiding Officer will be present (in-person / video conference / telephonic).
- 8.6 The IC shall maintain complete and accurate documentation of the complaint, its investigation process, and the resolution thereof.

**9 Nomination of members to IC**

HRC will nominate members to IC in terms of the composition laid down under this Policy.

HRC will reconstitute the IC upon retirement, transfer, disqualification, death, prolonged illness, or resignation of the members.

**10 Removal of members from the IC committee:**

Where any presiding officer or any member of the IC;

- i) Fails to maintain confidentiality and publishes, communicates, or makes known to the public, press and media or any other person



- (a) the identity and addresses of the aggrieved woman, respondent, and witnesses
  - (b) any details of the complaint
  - (c) any information relating to conciliation
  - (d) enquiry proceedings
  - (e) recommendations of the committee as the case may be;
- however, where it is necessary for the Bank to place the facts relating to the complaint or proceedings of the IC before any judicial or Constitutional Authority in any investigation so done by such authority, the members of the IC may make such disclosures or
- ii) Has been convicted for an offence or inquiry into an offence under any law or the time being in force is pending against him/her; or
  - iii) Has been found guilty in any disciplinary proceeding or a disciplinary proceeding is pending against him/her; or
  - iv) Has so abused his/her position as to render his/her continuance as member prejudicial to the public interest
  - v) Is found guilty of interfering with the impartial conduct of inquiry or arrival of settlement in case of complaint relating to Sexual Harassment.

Such presiding officer or Member, as the case may be, shall be removed from the committee by the HRC and the vacancy so created, or any casual vacancy shall be filled by fresh nomination by HRC. -

### **Grievance redressal process**

Following are the key steps:

#### **11 Complaint against Sexual Harassment:**

A complaint of sexual harassment can be made by aggrieved woman against any official of the Bank complaining sexual harassment as defined under para 5 and including for acts of behaviour involving,

- i. Unwelcome physical contact or sexual advances, requests for sexual favours, display of sexual visuals, sexual audios, display of pornographic or obscene material and any other verbal or physical conduct of a sexual nature,
- ii. Transmitting any message by mail, telephone, e-mail etc., which is obscene, lewd, suggestive, or blatantly sexual in nature,
- iii. Any explicit or implicit communication wherein a sexual favour or demand, whether by words or actions, is made a condition for complainant's or her kith and kin's employment, career progress, promotion etc. thereby creating a hostile environment for the victim.



- iv. Sexually charged jokes or remarks and behavior, which have sexually oriented innuendoes,
- v. Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealing:
- vi. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

**12 Procedure and time limit for filing the Complaint of Sexual Harassment:**

- i. Any aggrieved woman may make, in writing, a complaint of Sexual Harassment at Workplace to the Secretary of IC / designated email ID concerned within a period of three months from the date of alleged incident. She may, if she so chooses, submit the complaint to her Head of Department. The Head of Department should acknowledge the complaint promptly and forward the same to the IC concerned without loss of time.
- ii. In case of a series of incidents, the complaint should be made within a period of three months from the date of last incident. The time limit can be extended, by not more than three months, if there are reasonable circumstances, which prevented the aggrieved woman to make the complaint within the said period. Such reasons have to be recorded in writing.
- iii. The complaint should contain all the material and relevant details concerning the alleged harassment including the name of the respondent.
- iv. Where such complaint cannot be made in writing, the Presiding Officer or any Member of the Committee will render assistance to the woman for making the complaint in writing.
- v. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir, relative or friend, co-worker or any other person having knowledge of the incident may make a complaint on her behalf.
- vi. In case aggrieved woman is dead, a complaint may be filed by any person who has the knowledge of the incident, with written consent of her legal heir.
- vii. The allegations raised / a copy of the complaint received from the aggrieved woman shall be sent to the respondent within 7 working days of the complaint being made to the Internal Committee, for response to the allegations within 10 working days.



- viii. If the reply of respondent is not received within the stipulated period, IC will proceed further in the matter.
- ix. If the respondent is not an employee of our Bank, and if prima facie case exists, forward the complaint to the police, immediately for registering the case under section 75 of The Bharatiya Nyaya Sanhita (45 of 2023), and any other relevant provisions of the said Code where applicable, in consultation with Legal Division and necessary assistance may be extended to the aggrieved women if she chooses to file police complaint.

**13 Conciliation:**

At the request of the aggrieved woman, and before the inquiry has been initiated, the Internal Committee (IC) may settle the matter between the Complainant and the respondent through conciliation as under:

- i. Where a settlement has been arrived at, IC will record the settlement and forward the same to the Executive Vice President of Human Resources Department to take action as per the recommendation.
- ii. IC will provide the copies of the settlement to the aggrieved woman and the respondent.
- iii. Where a settlement is arrived at by conciliation, no further inquiry will be conducted by IC. The IC has to ensure that no settlement shall be made on the basis of monetary consideration.

**14 Inquiry into Complaint:**

- i. Where the settlement is not arrived at by Conciliation or the terms and conditions of settlement have not been complied with by the respondent, IC, where the respondent is an employee, will proceed to make inquiry into the complaint in accordance with the principles of natural justice and should give opportunity of being heard to both the parties.
- ii. IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the presiding officer of IC.

Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance to the party concerned.

- iii. The Complainant & Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of proceedings before IC.



- iv. While conducting enquiry, minimum three members of the IC, including Presiding Officer as the case may be, should be present.
- v. The parties shall during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings of IC, if any, before the DA.
- vi. For the purpose of conducting enquiry the “IC” has been given the powers of, summoning, and enforcing the attendance of any person and examining him on oath; requiring the discovery and production of documents. The HR Department shall provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry and shall also assist in securing the attendance of respondent and witnesses before the IC. Further, it shall make available such information to the IC as it may require having regard to the complaint.
- vii. Interim Reliefs: During the pendency of the inquiry, interim relief may be granted to the aggrieved woman.
  - a. The IC may recommend to the appropriate authority to transfer the aggrieved woman or the respondent or both to different workplace(s)/department.
  - b. Grant leave to the aggrieved woman up to a period of 3 months. This will be over and above of applicable service rules in this regard.
  - c. Grant such other relief to the aggrieved woman as may be prescribed.

On the recommendations of the IC, the HR shall implement the above recommendations and send the report of such implementation to the IC.

- viii. The inquiry is to be completed within a period of ninety days. The IC would be entitled to elicit all forms of evidence in this regard and the concerned parties would co-operate.
- ix. Inquiry Report: On completion of the Inquiry, the Internal Committee (IC) will provide its findings to the HR under NaBFID (Conduct, Discipline and Appeal) Procedure, 2024, within 10 days of its completion.
- x. Action taken by the Institution after completion of Inquiry:
  - a. If the allegations made in the complaint are proved, the Committee shall recommend to the HR:



- I. To take action against the respondent for sexual harassment as a misconduct/ penalty proceeding as per NaBFID (Conduct, Discipline and Appeal) Procedure, 2024.
- II. To deduct the sum of monetary compensation, if any, from the Salary of the respondent and arrange to remit the same to the aggrieved woman.
- III. For the purpose of determining the sums to be paid to the aggrieved woman, the Internal Committee, shall have regard to:
  - i. The mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman,
  - ii. The loss in the career opportunity due to the incident of sexual harassment,
  - iii. Medical expenses incurred by the victim for physical or psychiatric treatment:
  - iv. The income and financial status of the respondent,
  - v. Feasibility of such payment in lump sum or in instalments. In case the Bank is unable to make such deductions from the salary of the respondent due to his being absent or cessation of employment, the IC may direct to the respondent to pay such sums to the aggrieved woman.
  - vi. In case the respondent fails to pay the sum, the IC may forward the order for recovery of the sum to the HR.
  - vii. The HR shall take action through DA within 60 days of receipt of the report.
- b. In case, the allegation against the respondent has not been proved then the Committee can write to the HR that no action needs to be taken in the matter.

**15 Punishment for False or Malicious Complaints or False evidence:**

Where the Internal Committee (IC) arrives at a conclusion that

- i. the allegation against the respondent is malicious or
- i the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or
- ii the aggrieved woman or any other person making the complaint has produced any forged or misleading documents,



The IC may recommend to the HR to take action against the woman or the person who has made the complaint in accordance with the provisions of NaBFID (Conduct, Discipline and Appeal) Procedure, 2024. However, an inquiry must be made in order to establish malicious intent. Also, mere inability to substantiate a complaint will not attract action under this provision.

Where the Internal Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the HR to take action in accordance with the provisions of NaBFID (Conduct, Discipline and Appeal) Procedure, 2024.

## **16 Prohibition for publication**

Prohibition for publication of Identity and content of Complaint and inquiry proceedings and penalty thereof:

The contents of the complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee (IC) and the action taken by the HR will not be published, communicated or made known to the public, press or media in any manner. Any person found to contravene the above provisions shall be liable for punishment under NaBFID (Conduct, Discipline and Appeal) Procedure, 2024. However, information regarding the justice secured to any victim of sexual harassment under this Act without disclosing the identity can be disseminated.

## **17 Protection to the Complainant:**

The Institution is committed to ensure that no woman who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Institution will ensure that the aggrieved woman or witnesses are not victimized or discriminated against while dealing with the complaints of sexual harassment.

## **18 Appeal**

- a. Any person including the Respondent, complainant, the witness who is person aggrieved by the decision of the Internal Committee (IC) may prefer an appeal within ninety days of the recommendations appeal before the HR under NaBFID (Conduct, Discipline and Appeal) Procedure, 2024.
- b. An appeal may also be preferred for non-implementation of the decision of IC before the HR within the above-mentioned stipulated time.



- c. Any representation made before the HR against the recommendation of the IC, shall be deemed to be an appeal under section 18(i) of the Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. (As per the Office Memorandum issued by Ministry of Personnel, Public Grievances and Pensions Department of Personnel & Training Establishment Division dated 02.08.2016.)
- d. The HR shall refer the matter before the Disciplinary Authority through the Screening Committee constituted under CDA.
- e. The appeal so made shall be disposed of by the Disciplinary Authority as early as possible but not later than 90 days of such filing.
- f. Any person further aggrieved by the decision of the Disciplinary Authority to implement or otherwise of the recommendations of IC may pursue appeal process as per the CDA or such further legal remedies as are available under applicable law including Anti Sexual Harassment Law.

## **19 Annual Report**

IC shall, in each calendar year, prepare an Annual Report and submit the same to HR Department with the following details, namely:

- a) Number of complaints of sexual harassment received in the year;
- b) Number of complaints disposed of during the year;
- c) Number of complaints pending at the end of the year;
- d) Number of complaints pending for more than ninety days;
- e) Number of workshops or awareness programmes against sexual harassment carried out by the Bank;
- f) Nature of action taken by Bank against the accused/ guilty official

## **20 Disclosure in Bank's Annual Report:**

The Bank shall furnish the information pertaining to the number of cases filed and disposed of in its Annual Report.

## **21 Other action points**

- 1. All the Departmental Heads of Head Office Establishment and Administrative Unit functionaries will arrange to provide necessary assistance/ facilities to the Internal Committee (IC) and also strive, besides ensuring the compliance of the above policy, to ensure the following:



- i. Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at workplace;
- ii. Display at any conspicuous place in the workplace, the penal consequences of sexual harassment; and the order constituting the Internal Committee at each /office/ establishment of the Bank;
- iii. Organize workshops and awareness programs ( mail communication for awareness is mentioned in Annexure I ) at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment and organizing orientation programs for members of the Internal Committee to equip them with skills necessary for enquiries, procedures of investigation, initiation of disciplinary proceedings and documentation procedures while dealing with such cases;
- iv. Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting the enquiry;
- v. Assist in enforcing the attendance of respondent and witnesses before the Internal Committee;
- vi. Make such information available to the Internal Committee pertaining to the complaint.
- vii. Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita (45 of 2023) or any other law in force;
- viii. Cause to initiate action, under the Bharatiya Nyaya Sanhita (45 of 2023) or any other law in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, at the workplace at which the incident of sexual harassment took place;
- ix. Monitor the timely submission of reports/decisions of the Internal Committee.
- x. Encourage all the employees to come forward and report any instance of sexual harassment, either endured or observed. Besides acting as a strong deterrent, it helps in building a workplace culture that demonstrates care and responsibility towards the women employees.
- xi. If a case of unreported sexual harassment incident comes to the notice of the Department Head, it is his/her responsibility to make the aggrieved woman aware of her rights and encourage her to report the incident to get justice for her sufferings.



xii. In the case of sexual harassment incident coming to the notice of the Department Head, where the aggrieved woman chooses not to file a complaint, due scrutiny should be made to find positive, non-confrontational ways to convey the message to the offender that the behavior is undesirable and against the tenets of the service rules

A detailed FAQ is provided in **Annexure II**.

## **22 Guidelines to the individual**

1. The primary focus of this policy is to ensure a congenial work environment that is free from threat or fear. There are a few things you can do to help translate the policy into day-to-day practices.
2. Discrimination can take many forms: spoken, unspoken, or physical. Recognize that you may be conditioned to accept behaviors that infringe on your rights and constitute harassment, as normal workplace conduct.
3. Firmly say NO. It is possible that the offender does not know that his/ her behavior is unacceptable to you. Promptly make direct statements and communicate that the offender's conduct is not acceptable to you.
4. Participating in jokes and sexually tinged conversations is often taken as tacit permission to continue. Communicate early on that this conduct is unacceptable to you.
5. Warn the offender to immediately desist, first orally, and then, if necessary, follow it up with a warning in writing.
6. Assess the situation and appropriately time your complaint.
7. If you are unsure of the course of action to take in a given situation, we encourage you to approach any of the committee members informally and take their counsel.
8. We also encourage you to discuss any issues you may have in this area with your Human Resource Manager.

## **23 Guidelines to Supervisors**

1. Constant reinforcement is needed to build a culture of openness and trust which is congenial to performance. As people managers, you carry an additional responsibility of providing an enabling climate to those working under you. In this context, there are simple things that you can do to ensure this.
2. If an employee approaches you with a complaint, please guide him/ her as to the proper procedure for registering the complaint. You should immediately report the matter to the Secretary.



3. Often, the employee may not want to make a formal complaint but may seek your advice on how to deal with a situation. Please give the person a patient hearing. The matter should not be resolved informally, and you should guide the individual to escalate the matter to the appropriate authority.
4. There are different ways in which an employee can deal with such situations e.g. directly confront the employee who is harassing him / her or formally complain to the Committee.
5. Do not initiate an enquiry on your own. All such matters should be referred to the Secretary of the Internal Committee
6. When approached by an employee for your counsel, avoid making a quick judgment as to right and wrong and hold back advice/ opinions.
7. It is often difficult for victims of discrimination/ harassment to come forward with their complaints. Do not cross-question the individual or give the impression of doubting the authenticity of her/his report.
8. Ensure privacy for the meeting and help the employee feel that confidentiality will be maintained.
9. Protect the privacy of the employee and treat her/him in a manner that communicates respect for feelings and dignity.
10. Be conscious of your position and your power to impact the well-being of the subordinate and the decisions she/he may make.
11. Gender discrimination is not an individual issue between persons involved. This reinforces the tendency of women to try to cope with it on their own instead of complaining and seeking redressal. It must be treated as an organizational climate issue.
12. If any such incident is brought to notice, Supervisors are required to immediately report it to the Secretary of the Internal Committee (email id)
13. There should be no local investigation initiated in any circumstance.
14. All investigations will be done only by the designated committee.
15. All supervisors are required to report these cases immediately and any lapse in reporting will invite employee action.



Dear Colleagues,

NaBFID is a professional organisation, encouraging growth of individuals irrespective of gender, religion, caste or community and ensures that workplace is free of any kind of harassment or inappropriate behaviour.

NaBFID has in place policies and processes to safeguard employees against sexual harassment and discrimination.

Sexual harassment is a serious offense that can destroy human dignity and violate the right to gender equality. NaBFID ensures that all complaints are handled promptly and effectively with utmost sensitivity and confidentiality. Any employee, who wishes to report any offensive conduct at work premises, can do so without feeling threatened. The committee will take necessary and immediate course of action against the offender, upon reviewing complete evidence.

I would like to reiterate to all supervisors that if any such incident is brought to their notice, they are required to immediately report it to the committee. There should be no local investigation initiated in any circumstance. All investigations will be done only by the designated committee. All supervisors are required to report these cases immediately and any lapse in reporting will invite employee action.

Regards,  
Human Resources



### Frequently asked Questions (FAQ)

#### 1. Which complaints can be raised under the policy against Sexual Harassment at Workplace Policy?

If there is any innuendo / infringement of sexuality that vilifies the employee's working atmosphere; physically, verbally or otherwise; the employee should complain to the Internal Committee (IC),

#### 2. How should a complaint be raised?

To report a complaint, employee can write to the Secretary of the committee, who will constitute the IC to take the investigation forward.

Alternatively, an employee may submit a complaint through the Government of India's centralized Sexual Harassment electronic Box (SHe-Box) portal by visiting [shebox.wcd.gov.in](http://shebox.wcd.gov.in).

#### 3. How can complaint be raised if the aggrieved woman is not able to submit the complaint herself?

- i. If the "aggrieved woman" is unable to make a complaint on account of her physical incapacity, then complaint can be filed by – her relative, friend, coworker, an officer of National Commission for Women (NCW) or State Commission for Women (SCW), or any person having the knowledge of the incident- with written consent of 'aggrieved women'
- ii. If the "aggrieved woman" is unable to make a complaint on account of her mental incapacity, then complaint can be filed by- her relative, friend, special educator (means a person trained in communication with people with special needs), a qualified psychiatrist psychologist, guardian or authority under whose care she is receiving treatment or by someone who has knowledge of the incident jointly with any of the persons mentioned above.
- iii. If the "aggrieved women" is dead then by any person having knowledge of the incident with consent of her legal heir
- iv. For any other reason, if the aggrieved woman is unable to make a complaint, it may be filed by any person who has knowledge of incident, with her written consent.

#### 4. How will the inquiry be conducted?

- i. On receipt of the complaint, the IC will send one copy of the complaint with list of documents to the Respondent within seven working days.
- ii. The Respondent needs to file reply along with his list of documents names and addresses of witnesses within ten working days from the date of receipt.



- iii. The IC shall conduct the inquiry as per the principle of natural justice
- iv. Before such inquiry, the IC may at the request of the Complainant, take steps to settle the issue through Conciliation.

**5. Can any party be represented by an advocate?**

Advocates are not allowed.

**6. What happens if any party does not appear for the investigation?**

The IC shall have the right to terminate the inquiry or proceed with ex-parte inquiry, in case Complainant or Respondent fails to be present for three consecutive hearings without sufficient cause.

**7. Is there any interim relief provided to the aggrieved woman during investigation?**

During pendency of inquiry, if requested by aggrieved woman in writing, IC may recommend: -

- i. Transfer the aggrieved woman or the respondent to any other department of workplace, if any on her written request
- ii. Grant leave to the aggrieved woman up to a period of three months (in addition to the leave she would be otherwise entitled)
- iii. Restrain the respondent from reporting on her work performance or writing her confidential report and assign the same to others

**8. What are the powers bestowed to IC?**

IC while conducting inquiry will have the power of a Civil Court like summoning, making attendance a must and production of document/records a must.

**9. If an employee (subordinate or otherwise) has come to me with a complaint, what should I do?**

The complaint should be directed to the Secretary of the IC. Local hierarchy should not independently investigate into sexual harassment complaints.

**10. If an employee has raised a sexual harassment complaint, and I do not think it is critical or valid, what should I do?**

The employee should be directed to send his / her complaint to the Secretary of the IC. Only the IC can decide on criticality and validity of complaints.

**11. How do I know if my complaint is a sexual harassment complaint?**

Please refer to the Policy for definition of sexual harassment.



**12. If I come to know of a sexual harassment complaint, but the employee is not willing to make a formal complaint, what should I do?**

The Employee should be requested in writing to make a formal complaint. Please assure the Employee that she should not be afraid and that the process works and action is taken as required. However, investigation would not be possible without a formal complaint.

**13. How confidential is the investigation process?**

The Internal Committee (IC) will maintain confidentiality of the process to the extent possible for a fair and just investigation. The complaint will be shared with the person it is made against; the highlights of the complaint may be shared with other witnesses in the investigation

**14. How long does the process take?**

The Internal Committee (IC) would contact the complainant generally within 7 working days post receipt of the complaint and an investigation will be held into the complaint. The entire process will be completed within 90 days from date of receipt of the complaint.

**15. What happens if an employee is found guilty of sexual harassment?**

If, on conclusion of the investigation by the IC, an employee is found guilty then the IC shall decide on the appropriate punishment and submit its finding to the Institution for implementation. If the action amounts to offence under Indian Penal Code, then the Institution may facilitate initiation of criminal proceedings.

**16. What happens if it was a false complaint?**

The IC will recommend strict disciplinary action against false, malicious and motivated complaints.

**17. How do I know what behaviour is acceptable and what is unacceptable?**

Please refer to the Policy on Guidelines to the Individual and supervisors.

**18. Where can any party unhappy with the decision of IC appeal?**

Yes. Such an appeal can be made before the Appellate Committee.

