Sonu Bhatt, IAS

Addl. Deputy Commissioner,
Gurugram

D.O No : 50
Dated : 23-12-25

To

All Non-Govt. organisation (Schools Banks companies etc) Gurugram

Subject: **PoSH ACT COMPLIANCE CHECKLIST (COMPREHENSIVE).**

This is to bring to your urgent attention about the formation of an Internal Committee is legally mandated by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (**"PoSH Act, 2013"**). As per the PoSH Act, it is mandatory for the Internal Committee to provide an Annual Report in the prescribed format to the District Officer.

You are hereby directed to submit the Annual Report of your organisation pertaining to compliance under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and redressal) Act, 2013 for the year 1st January, 2025 to 31st December, 2025.

1. **Policies:**

a. Have you prepared and implemented an internal PoSH policy for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women in your organization?
If yes, please state the reference number of the policy: .....

b. Is sexual harassment specified as a form of misconduct under your employment contract or service rules, or the Standing Orders (if Standing Orders are applicable to your business)?

If yes, please state the reference number: .....

c. Have you created an Internal Committee (IC) at your office (or offices) as required under the PoSH Act, 2013?

2. **Notices:**

a. Have you displayed at conspicuous places in the workplace sufficient notices informing employees about your organization's stance on sexual harassment and the consequences of indulging in such acts?

If yes, please attach a sample of the notice and also mention where this notice is displayed (e.g. at the notice board at the entrance of the workplace etc.) .....

b. Have you provided sufficient information about the members of the IC at prominent places in the workplace in Hindi as well as English and regional language (applicable if you have employees/vendors/sub-vendors/contract labours/visitors etc. from a particular region who cannot read English or Hindi), so that employees and staff can reach out to them.

If yes, please attach a sample of display and also mention where this notice is displayed (e.g. at the notice board at the entrance of the workplace etc.).....

Vikas Sadan, Opposite Mini Secretariat, Gurugram (Haryana) 122001
Tel. : 0124-2322211, 2332363, E-Mail ID- posh-grg.rev@hry.gov.in, adcgrg@hry.nic.in

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3. **Employee awareness and assistance:**

a. Do you organise workshops, awareness programmes or seminars at regular intervals to sensitize employees about the stance of your organization on sexual harassment and about the consequences of engaging in any conduct that amounts to sexual harassment?

If yes, please provide the date and number of workshops conducted in the calendar year 2025 (1st January, 2025 to 31st December, 2025).

- No. of Physical (in-person) orientation programme with date- .....
- No. of Virtual orientation programme with date- .....
- Instructor-led virtual orientation programme.....
- E-learning modules (educational materials and instructions), also mentioning the language(s) in which the E-learning module is disseminated.....

b. Have you covered all your employees (including contractual staff like security guards, washroom attendants, labourers, drivers, loaders etc.) in these awareness programmes?

c. Have you made efforts to make employees aware about their rights under the act?
If yes, **please mention briefly about such communication:** .....

d. Is there any system or process to provide assistance to an employee who has been sexually harassed, in approaching the complaints committee and in dealing with psychological and other effects of sexual harassment?
If yes, **please mention briefly about the system:** .....

e. Does your organization provide assistance to the harassed individual to make criminal complaint in the police station under the Indian Penal Code (45 of 1860) or any other law for the time being in force?

4. **Internal Committee:**

a. (Section 4 (i) of the act states that every employer of a workplace shall, by an order in writing, constitute a Committee to be known as "Internal Committee" **(Please attach order copy showing constitution of the Internal Committee).**

b. Please note that where the offices or the administrative units of the workplace are located at different places or divisional or sub-divisional level, the Internal Committee shall be constituted at all administrative units or offices.

c. Do you have required number of members in the IC as per the conditions laid down in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013?

If yes, details of the Internal Committee formed in your office are to be provided in below mentioned format

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Sr. no	Details of member of IC	Name	Official Designation	Contact detail & email-id	Remarks
1	Presiding officer (Should be a senior level woman)				
2	Member				
3	Member				
4	External Member (External Member should be qualified to act under PoSH Act, 2013				
5					

d. Have you conducted an orientation program for the IC members?

If yes, please provide dates of such programmes: .....

e. Do you conduct capacity and skill building workshops for the IC members?

If yes, please provide the year wise the number of workshop (with date) conducted in year 2024 & 2025.

f. Do you provide necessary facilities to the IC for dealing with sexual harassment proceedings?
.....

5. Compliance with complaints committee recommendations

a. Have you followed the recommendations of the IC/LC (as applicable) regarding the interim measures?
b. Have you implemented the IC/LC's (as applicable) recommendations as per the final award in the prescribed time period?
c. Do you monitor functioning and performance of the IC at a broad level?

For example: whether the complaints follow the prescribed time limits and procedures? Whether conciliation and the interim measures were considered?

6. Reports:

a) Does the IC forward an annual report containing necessary details of sexual harassment case proceedings to the prescribed authorities?

b) Do you include information about pending and resolved sexual harassment cases in the annual report of your company, as required under Section 22 of the PoSH Act?
If yes, please share an extract of this reporting.....

c) As mentioned in Companies (Accounts) Rules, 2014 under Rule 8, have you included a statement that your company has complied with provisions relating to the constitution of Internal Committee under the PoSH Act, 2013?

If yes, please share an extract of this reporting.....

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7. **Annual Report:**

Attached your annual report which the Complaints Committee is required to prepare u/s 21of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, mentioning the following details:-

No. of Complaints of sexual harassment received in the year	
No. of complaints disposed off during the year	
No. of complaints pending for more than ninety days (along with reasons for delay)	
No. of workshop or awareness programme against sexual harassment carried out	
Nature of action taken by employer or District Officer	

Please note that formation of an Internal Committee and submission of required details and annual report as specified in Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, is legally mandatory; failure to comply with provisions of the Act will be subject to penalty as prescribed in the said Act.

Addl. Deputy Commissioner,
Gurugram-cum-District Officer
Under PoSH Act, 2013

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