



POLICY OF SEXUAL HARASSMENT

POLICY AND GUIDELINES

INVENTURE ACADEMY

NOTIFIED ON JUNE 2021

OUR POLICY AGAINST SEXUAL HARASSMENT

Inventure Academy is committed to providing a safe and secure educational space for every individual to achieve his or her true potential. Our school environment is built on mutual respect, cultural sensitivity and a zero tolerance for any form of sexual harassment.

Any form of sexual harassment is not tolerated.

Any form of sexual harassment of men and women in the workplace and any harassment of children of any kind is unlawful and will be subject to penalties in accordance with the applicable law.

All Inventure faculty and management personnel, are required to comply with this policy against sexual harassment at the workplace.

All employees are required to read, familiarise themselves with the policy following which they will need to sign their acceptance with the policy.

WHAT CONSTITUTES SEXUAL HARASSMENT?

Sexual harassment is any form of unwelcome physical, verbal or non-verbal conduct of a sexual nature at the workplace. In relation to a minor, any form of physical, verbal or nonverbal conduct of a sexual nature will be considered unlawful sexual harassment, irrespective of whether such conduct is alleged to be welcome or unwelcome.

The harassment may relate to a single incident or may happen over time. The harassment may be expressed, but in many cases, it is implied from the conduct.

Sexual harassment does not only involve cases where one person engages in conduct that requests or implies sexual favours or any form of relationship in return for some benefit or safety from reprisal. Sexual harassment could also arise if the action or conduct creates a hostile work or school environment. (eg. suggestive teasing, making unwelcome or suggestive sexual remarks or comments, improper touching or inappropriate staring)

EXAMPLES OF SEXUAL HARASSMENT

Sexual harassment includes but is not restricted to the following types of conduct:

Sexually coloured language, jokes, comments, messages and songs.

Any form of profanity or obscenity (verbal or written - including through electronic media such as email, text or SMS messages, instant chat and social media posts or use of language that denigrates someone on the basis of their gender or sexual orientation)

Inappropriate physical contact, gestures, body language or signs including inappropriate staring.

Access to and display of pornographic content in any form (including cartoons) and on any media

Stalking (following or repeatedly persisting in an offensive behavior such as unwanted visits, phone calls, texts, emails or letters, leaving presents or watching someone's home)

Requests for sexual favours or any other verbal, visual or physical contact of a sexual nature that prevents an individual from effectively performing the duties of their position due to the emotional and psychological distress it causes.

Any interaction of a sexual nature that creates an intimidating, hostile or offensive environment.

When a sexual favour of any nature is made as a condition of academic advancement, team placements or penalties or consequences for breach of school rules or terms of employment or

as a condition for employment or compensation, either implicitly or explicitly (eg, offering better grades or selection to a team or safety from consequences of breaking a school rule or threatening to fire or punish someone if they don't accept sexual advances).

The above list is only illustrative and not exhaustive. Other forms of conduct could amount to sexual harassment, if it involves any form of unwelcome physical, verbal or non-verbal conduct of a sexual nature, in case of an adult of any sort of physical, verbal or non-verbal conduct of a sexual nature, in case of a minor.

THE INVENTURE POLICY: ZERO TOLERANCE

Inventure has a zero tolerance policy to any form of sexual harassment. Even a single incident of sexual harassment if found to be true, after investigation, as per this policy, will be met with the strictest disciplinary action based on the nature and intensity of the violation. The consequences of the violation may even include termination of employment and payment of compensation to the victim directly by the person found guilty of sexual harassment. If required by law, the school may also report the incident to the police or other authorities for criminal action to be initiated.

WHO IS COVERED?

While sexual harassment is an issue that can affect men and women alike, this policy is primarily, although not exclusively, intended to protect women from sexual harassment in the workplace. However, this is also applicable to men at the workplace.

In addition, the school has an obligation to protect all students. Therefore, this policy will also be applied to protect students, irrespective of gender and age, from any form of sexual harassment. The overall goal of the policy is to facilitate a safe working and educational environment for all individuals.

The policy covers all hierarchical relationships within the school (co-workers, colleagues and manager-subordinate relationships).

WHERE DOES THE POLICY APPLY?

The policy applies to all Inventure premises (including within the classroom, sports field or any part of the educational institution) and beyond. Sexual harassment outside Inventure's premises will also be covered by this policy if there is any link with the educational institute (eg, if a supervisor or teacher harasses a child on a school bus/ field trip). Therefore, sexual harassment is also prohibited in extended environments such as cafeterias, school transport, parking areas, team outings and school events at external venues. A formal complaint may be made to the Committee in writing and the matter will be investigated via a formal investigation.

DURING WHAT TIME PERIOD DOES THE POLICY APPLY?

The policy applies at all times. This includes during school hours and after school hours, to all work related or school related functions including social events. If an incident of sexual harassment is alleged to occur, the following procedure should be followed:

STEP 1: COMPLAINT PROCEDURE

The aggrieved person (either the child, parent or a staff member of Inventure Academy, as the case may be) who says that an incident of sexual harassment has occurred has the option of making a complaint to the anti-harassment committee constituted by the school for this purpose. Details regarding the members of this committee and their contact numbers/email addresses have been provided on page 7 of this document.

In keeping with its zero tolerance policy, complaints against any incident of sexual harassment are encouraged.

If the person chooses to make a complaint, the person must make the complaint in writing (either the child, the parent or a staff member of Inventure Academy as the case may be) and within 3 months of the last incident of sexual harassment. A complaint sent by email to any Committee member will be treated as a complaint made in writing for purposes of this policy. (If there are any difficulties with making the complaint in writing, or within 3 months, the Committee may, for reasons to be recorded in writing, grant an extension of time to make the complaint).

STEP 2: CONCILIATION/ QUERY

The aggrieved person has the option (but not the obligation) to request conciliation instead of an inquiry into the complaint. If the aggrieved person requests conciliation, the Committee will take steps to have the matter settled by conciliation. If the matter is settled, the Committee will record the settlement and provide copies of the recorded settlement to the concerned parties. However, a monetary settlement cannot be made as a basis of conciliation.

If the aggrieved person does not request conciliation or if the aggrieved person notifies the Committee that the terms of the recorded settlement have not been complied with, the Committee will initiate an inquiry into the complaint, provided the party accused of the conduct giving rise to sexual harassment is an Inventure employee.

During the inquiry, (if both parties are at Inventure) both parties will be given an opportunity to be heard and a copy of the findings will be provided to both parties to allow them to make representations against the findings before the Committee. During these Committee hearings, as per the law, the parties are NOT permitted to be represented through legal counsel. They may choose to speak to lawyers separately, but lawyers cannot participate in Committee hearings or meetings.

Under law, the Committee has the powers of a civil court to summon witnesses and request documents. The Committee also has limited powers to provide interim relief to the aggrieved person while the inquiry is underway.

The inquiry will be completed within 90 days from the date it started. The inquiry report will then be provided to Inventure management and concerned parties within 10 days of completion of the inquiry.

STEP 3: COMMITTEE FINDINGS

If the Committee finds the alleged sexual harassment has not been proved, it will recommend that no action is required. However, if it finds the allegation has been proved, it is required by law to recommend that: (a) Inventure take action against the sexual harassment as misconduct under Inventure's service or school rules, as applicable, and (b) require compensation to be paid to the aggrieved person.

The payment is to be made either by deducting the compensation from the other party's salary or if the other party is no longer available by directing the respondent to make the payment directly. If the other party fails to pay the sum, the Committee will forward its report to the concerned government officer and the sum can be collected as if it were an arrear on land revenue.

The compensation to be awarded by the Committee will be determined based on the attendant circumstances (eg, emotional distress, loss in academic performance, career opportunities, medical expenses and financial standing of the respondent). Inventure is required by law to act on the Committee's recommendation within 60 days.

In case of false or malicious allegations or if false evidence is produced, the Committee is authorized (based on an inquiry into such matters) to recommend that Inventure take action against the person making the false or malicious complaint or the person producing false evidence. The mere inability to substantiate a complaint or provide adequate proof will not attract action against the complainant in this regard. Furthermore, before any action can be initiated against a complainant for making a false complaint, the malicious intent of the complainant has to be established by a separate enquiry conducted in this regard.

STEP 4: APPEALS

Certain recommendations made by the Committee are subject to appeal under law. Such appeals must be made within 90 days of the recommendation to a court or tribunal that will be identified in rules notified by the government.

MISCELLANEOUS

CONFIDENTIALITY

The complaint, settlement, inquiry proceedings and findings cannot be published or made known to the public in any manner. However, information on the justice provided to a victim may

be disseminated without disclosing any particulars that would lead to identification of the aggrieved person or any witness.

CHANGES TO THE POLICY

This policy is subject to change in accordance with applicable law. Any change will be notified to all Inventure employees.

INQUIRIES

For any inquiries on this policy, please send an email message with your inquiry to the Principal at meenakshimyer@inventureacademy.com

INVENTURE POSH COMMITTEE

Inventure has constituted a Committee for the Prevention of Sexual Harassment to administer and implement this policy and the provisions of applicable law.

The current members and their contact details are as follows. An employee or student may write or send an email message to any committee member when making a complaint.



**COMMITTEE FOR PREVENTION OF SEXUAL HARASSMENT
2023-2024**

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Mrs. Meenakshi Myer
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