



Going to School Anti-Sexual Harassment Policy

PREAMBLE

Going to School is committed to ensuring that it continues to be a safe and inclusive space for all its employees. In furtherance of the rules set down by the [Sexual Harassment of Women at Workplace \(Prevention, Prohibition and Redressal\) Act, 2013](#) (hereinafter referred to as the 'Act'), and the [Sexual Harassment of Women at Workplace \(Prevention, Prohibition and Redressal\) Rules, 2013](#) (hereinafter referred to as the 'Rules'), and our personal commitment towards ensuring a work environment free from sexual harassment of any nature, **Going to School** is bringing into force this Anti-Sexual Harassment Policy, referred to as "Policy" hereinafter.

A) PRELIMINARY

Going to School has a Permanent Account Number: AAATG5061F, 12A Provisional Reg. No.: AAATG5061FE20214, 80G Provisional Reg. No.: AAATG5061FF20214, FCRA Reg. No.: 231660874 valid till 30th June 2027, DARPAN Id: DL/2017/0166410, CSR Reg. No.: CSR00000592 operates. **Going to School** has its registered office at 4/23, 4th floor, F block, Birbal Road, Jangpura Extension, New Delhi 110014.

This policy applies to all employees of **Going to School**, both full time and part-time, and includes within it independent contractors, volunteers, interns, partners and collaborators.

This policy also applies to all persons that visit any physical workplace of **Going to School**, including but not limited to:

1. People attending **Going to School** events at different venues;
2. Visitors and persons that come to the **Going to School** space for meetings.

B) DEFINITIONS

For the purpose of this policy, the following terms are defined as follows:

1. **Employee:** any person engaged in work directly or indirectly for **Going to School**, irrespective of whether they are employed in a permanent, temporary, contractual or voluntary capacity; and irrespective of whether they are remunerated for their work or not. It also includes those engaged to work for **Going to School** via a contractor or service provider, with or without the knowledge of the employer.
2. **Employer:** the person(s) responsible for management, supervision, and control of **Going to School** i.e. the Board of Directors – complaints will be made to the Local Complaints Committee.
3. **Aggrieved woman:** any woman, employee or not, who alleges that she has been subjected to sexual harassment by the respondent.
4. **Respondent:** any person accused of perpetrating, abetting, aiding, and/or facilitating sexual harassment. The respondent can be of any gender.
5. **Workplace:** including but not limited to the physical working space of employees and members, but extending to any physical or virtual space that the employees may occupy or engage in, arising out of or during the course of their work at **Going to School**, including the transit to and from that place – if such mode of transport is paid for by **Going to School**.



6. **Sexual Harassment** includes the following, implied or direct, unwelcome acts and/or behaviours, directed against a woman:
- Direct physical contact and advances;
 - Asking for or demanding sex and/or other sexual acts;
 - Making remarks that are sexual in nature;
 - Showing pornography in any form – text, video, etc;
 - Any other unwelcome act or behaviour of a sexual nature, which could be physical, verbal or non-verbal.

7. Additionally, if the person is in a situation where one or many of the following circumstances exist, among other circumstances or in relation to any act or behaviour given under (9) above, they may be facing **sexual harassment**:

1. There is a direct or indirect promise of preferential treatment in their employment;
2. There is a direct or indirect threat of detrimental treatment in their employment;
3. There is a direct or indirect threat about their present or future employment;
4. There is an interference with their work which is creating an intimidating, offensive or hostile work environment for them;
5. Humiliating treatment that is likely to affect their health or safety.

8. In case an employee of **Going to School** is sexually harassed by someone outside of **Going to School** in the course of their work for **Going to School**, the complaint will be heard by the Internal Committee (IC) of the organisation where the aggrieved woman prefers to make the complaint. If the respondent does not belong to any other organisation or if their organisation doesn't have an IC, it will be heard by the IC at **Going to School** by default.

C) REDRESSAL MECHANISM

In accordance with the procedures laid down by the Act, the Rules and the powers vested in **Going to School** to determine certain procedural aspects, the internal redressal mechanism is as follows:

C.1. FILING A COMPLAINT

1. The first step is for the aggrieved woman to draft the complaint, this should include specific details of the incident(s) of sexual harassment: including a description of the incident(s), the date, timing, location of the incident(s), name of the respondent, and the working relationship between them and mail it to poshcommittee@goingtoschool.com. In case the aggrieved woman cannot write, an IC member will help translate their oral complaint into writing;
2. The aggrieved woman has to submit six copies of the complaint to the IC, along with six attached copies of any supporting evidentiary documents, this will include the names and contact details of any witnesses they are presenting on their behalf. Complainants are advised to maintain a digital and physical copy of the complaint and supporting evidence for their personal records.
3. We encourage you to make the complaint by email. You can do so by emailing any of the IC members, their details are in Annexure 'A'



4. The IC will mandatorily provide a written acknowledgement of receipt of the complaint;
5. The aggrieved woman must submit the complaint to the IC within three months of the incident of sexual harassment, in case the sexual harassment was recurring, the three-month period is applicable from the last instance of such harassment;
6. The IC may provide an extension of up to three months for filing the complaint if it finds that the circumstances allow for it;
7. On receiving the complaint in writing, the IC will provide a copy of the complaint to the respondent within 7 days of receiving such a complaint;
8. The respondent is to respond in writing to the complaint made against them, with any supporting documents and names and addresses of witnesses, within 10 days to the IC.

C.2. FILING A COMPLAINT ON BEHALF OF SOMEONE

1. If the aggrieved woman is unable to file a complaint before the IC, their legal heir or any person authorised by them in writing can make the complaint on their behalf;
2. In case of physical inability of the aggrieved woman to file a complaint, a relative, friend, coworker, an officer of the National Commission for Women or State Women's Commission, or anyone who knows about the incident of sexual harassment can file the complaint with the written consent of the aggrieved woman;
3. In case of mental incapacity of the aggrieved woman to file a complaint, a relative, friend, special educator, a qualified psychiatrist or a psychologist, the guardian or authority under whose care she is receiving treatment or care can file a complaint or any person who knows about the incident of sexual harassment can file a complaint jointly with a relative, friend, special educator, a qualified psychiatrist or a psychologist, the guardian or authority under whose care she is receiving treatment or care;
4. In other situations, including the death of the aggrieved woman a person appointed by the aggrieved woman or their legal heirs can make the complaint.

C.3. CONCILIATION/ MUTUAL SETTLEMENT

1. In case the aggrieved woman wants to adopt an informal process for resolving her complaint, she can ask the IC for help with settling the matter through a mutual agreement between her and the respondent;
2. Things to keep in mind with reference to a mutual settlement:
 1. Only the aggrieved woman can initiate the conciliation
 2. The IC will help facilitate the mutual settlement and will appoint a neutral conciliator for the proceedings
 3. The settlement agreed upon cannot be a monetary compensation given by the respondent to the aggrieved woman
 4. The aggrieved woman cannot be pressured to opt for a mutual settlement.
3. If a mutual settlement is reached, the IC will formulate a written record of the settlement and provide it to the employer for further action;



4. Both the aggrieved woman and the respondent have a right to a copy of the written record of the settlement;
5. Where a settlement is reached in keeping with the terms mentioned above, no further inquiry shall be conducted by the IC;
6. In case of breach of any terms of the settlement, the aggrieved woman may approach the IC for further action.

C.4. INQUIRY

1. Either after breach of the mutual settlement or in case a mutual settlement is not opted for, the IC will cross-examine the aggrieved woman and the respondent. Alongside, it will examine documents and hear evidence from witnesses on both sides;
2. The aggrieved woman can choose to not be present at the same time as the respondent and proceedings can be held separately for both;
3. The cross-examination may be done virtually, if required, with the consent of the parties involved;
4. In case the persons involved would prefer in-person cross-examination and testifying, **Going to School** will bear the expenses of their travel and stay, if any, which the respondent may be asked to pay for, if found guilty;
5. The parties to the complaint are not allowed to bring in any lawyer to represent them in their case at any stage of the proceedings;
6. If the aggrieved woman or the respondent is not present for three consequent hearings, without sufficient cause, the IC is empowered to end the inquiry or give a decision. Any such notice of termination or of an ex parte decision may not be passed without giving a written notice to the party concerned, 15 days in advance;
7. It is mandatory for 75% of the IC members or 3 persons, whichever is lower to be present at all hearings. The Presiding Officer must be present at all hearings;
8. The IC will record all its proceedings in writing in as detailed a manner as possible;
9. The IC may record portions of or all of its proceedings in an audio-visual format, only with the explicit consent of all parties involved. It is the duty of the IC to ensure that such audio-visual material remains confidential;
10. The IC will finish its inquiry within 90 days from the date of receipt of the complaint and will provide its final findings and recommendations to both parties and to **Going to School** in writing within 10 days after completion of the inquiry;
11. Once **Going to School** receives the recommendations of the IC, it will implement them within 60 days of such receipt in writing and send a report of such implementation to the IC;
12. The IC may find the respondent guilty or not guilty or find the evidence inconclusive and will recommend action accordingly;
13. Provided, where both the parties are employees, before finalising its report, the IC shall share its findings with both the parties and provide them an opportunity to make a representation against it before the IC.



14. If a prima facie penal case exists, the IC will forward the complaint to the police for registering it as a case under S.509 of the Indian Penal Code and other relevant sections within a week of receipt of such a case, and will provide further assistance as required.

In case the employer is accused of sexual harassment, the aggrieved woman is to prefer a complaint before the Local Complaints Committee. The IC cannot hear such a case.

D.4. SUPPORT TO AGGRIEVED WOMEN

Going to School will provide all reasonable support to the aggrieved women to ensure justice:

1. On receipt of any such complaint, the aggrieved woman can immediately stop reporting to or working with the respondent, until the complaint is resolved;
2. If the IC receives a written request from the aggrieved woman, they can recommend to the employer that:
 1. The aggrieved woman or the respondent be transferred to another workplace
 2. The aggrieved woman be given paid leave, of upto three months, in addition to any existing leave they may have.
 3. The aggrieved woman cannot be given a leave or be transferred against their will;
3. During or after such a complaint and/or inquiry, **Going to School** will take all steps to ensure that the work environment is not hostile for the aggrieved woman.
4. **Going to School** undertakes that the employee reporting the case of sexual harassment will not be terminated merely on grounds of reporting said case.

D.5. PUNISHMENT

1. The punishment will be decided in accordance with each case by the IC. Some actions that may be taken against a guilty respondent are:
 - Written apology;
 - Disciplinary action;
 - Community service;
 - Warning;
 - Counselling;
 - Reprimand or censure;
 - Withholding of promotions;
 - Withholding of pay or increments;
 - Termination of their service;
- b. The IC can recommend monetary compensation be paid by the offender, which will be deducted from their salary if the offender does not pay directly.



c. If the offender is not working for **Going to School** anymore or doesn't directly work for **Going to School**, they can be ordered to pay the compensation to the aggrieved woman directly. In case they don't pay, the IC can ask the District Officer to recover the money from the offender.

D.6. COMPENSATION

1. The amount of money that victims can receive as compensation is based on the following:
 1. Mental trauma and distress caused to the aggrieved woman;
 2. Any lost job opportunities because of the sexual harassment;
 3. Medical treatment (physical or psychiatric) that the aggrieved woman may require;
 4. The respondent's income and general financial status;
2. The Committee can decide whether this money should be paid over time in instalments or all at once.

D.7. REPORT

1. The final report prepared by the IC will contain the following details:
 - A description of the different aspects of the complaint;
 - A description of the process followed;
 - A description of the background information and documents that support or refute each aspect of the complaint;
 - An analysis of the information obtained;
 - Findings; and
 - Recommendations.

D.8. APPEAL

1. Any person not satisfied with the findings or recommendations of the IC or non-implementation of the recommendations may appeal in an appropriate court or tribunal in Delhi within 90 days of the recommendations being made by the IC;
2. An appeal can be made by the respondent or by the aggrieved woman.

E. CONFIDENTIALITY

1. The aggrieved woman and the accused have the right to privacy with regard to their complaint and the follow-up action. commits to adhering to these privacy requirements and will keep the following information private and confidential:
 1. The identity and address of the aggrieved woman, the respondent, and the witnesses;
 2. Any information about the mutual settlement/conciliation or the inquiry being conducted by the IC;
 3. Recommendations made by the IC;
 4. Follow up action taken by the employer.



2. However, **Going to School** can share details of cases in a strictly anonymised format as learning tools or for public documentation purposes.

G. FALSE COMPLAINTS

1. The process for determining a false complaint will be the same as for determining a case of sexual harassment and will be heard by the IC. The possible punishments will remain the same as those for a case of sexual harassment.
2. A mere inability to provide adequate proof to substantiate a complaint will not attract any penalty and will not be considered a false complaint unless proven otherwise.
3. The person making the claim regarding the said complaint being a false complaint has to provide the proof to the IC, who will then investigate and provide recommendations to the employer.

H. ALTERNATE REMEDIES

1. The aggrieved woman also has the right to file a criminal complaint against the accused, instead of filing a complaint with the IC. The aggrieved woman can also file a complaint with the IC and register an FIR.
2. In case the aggrieved woman chooses to file a criminal complaint, **Going to School** will extend all reasonable support towards filing the FIR.
3. The aggrieved woman can also complain on the website of the Ministry of Women and Child Development.

I. IC COMPOSITION

1. The **Going to School** IC composition is provided for in Annexure A to this policy, with contact details of all IC members.

J. PERSONAL RESPONSIBILITY MEASURES

These are some other measures that we will be taking to ensure that **Going to School** is a safe environment for all people that work here and that interact with it in any manner:

1. The legal consequences of sexual harassment will be prominently displayed at each location of **Going to School**, along with details of the constitution and contact details of the relevant IC; in a location where it will be clearly visible to employees, members and visitors.
2. There will be mandatory legal awareness, gender sensitisation and anti-sexual harassment training for all employees of **Going to School**.
3. In case of any complaints of sexual harassment at **Going to School**, **Going to School** will make every effort to provide support to the aggrieved woman, ensure attendance of requisite persons at IC hearings, and share related information with the IC.
4. **Going to School** will submit an annual report to the appropriate government, detailing cases of sexual harassment reported to its IC and action taken, in compliance with the Act.
5. **Going to School** will strive to ensure that such protection is afforded to people of all genders, provisions for the same are made in Annexure 'B' to this policy.



K. NON-INTERFERENCE IN THE WORKINGS OF THE IC

1. No employee of **Going to School** will interfere with the working of the IC, if any employee is found guilty of doing so, disciplinary action can be taken against them;
2. The **Going to School** Board of Directors will not interfere with the working of the IC, any such interference can result in legal liability for them and **Going to School**.

Going to School is bringing this policy into effect with the intent of creating safer and more inclusive workplaces, in case of a situation arising that is not covered by this policy, we shall make all attempts to provide support to the aggrieved woman and undertake a just course of action.

ANNEXURE A

Composition of the Going to School IC as re-constituted in November 2025

Sr. No	Name	Designation	Email id
1.	Lisa Heydlauff - Presiding officer	CEO	lisa@goingtoschool.com
2.	Pearl Barretto	HR Manager	pearl.barretto@goingtoschool.com
3.	Rashmi Gurav	Program Manager	rashmi.gurav@goingtoschool.com
4.	Gagan Jena	Chief Finance Officer	gagan@goingtoschool.com
5	Annie Jacob	Monitoring, Evaluation & Learning Lead	annie.jacob@goingtoschool.com
6.	Anupama Kapoor	External Member	anupama@goingtoschool.com

ANNEXURE B

The law is extended primarily to women, but at **Going to School** we will extend redressal to all grievances of all team members irrespective of their sexual or gender identity in the best way possible.

To afford such protection to persons of all genders, **Going to School** will extend this policy to those not covered by the Act and this policy as well, in the following manner:

Sexual harassment of persons other than those identifying as female will be considered as misconduct under <name of relevant policy which governs with disciplinary concerns pertaining to employees> with all other procedural details and timelines followed will be in accordance with this policy.

This mechanism exists separately from the Anti-Sexual Harassment Policy, even though the same processes apply.