

Policy and Guidelines for the Internal Complaints Committee

Praxis Business School



1. Objective:

1.1 This policy aims to raise awareness among employees about their fundamental right to a safe and respectful work environment. It defines what constitutes sexual harassment, outlines the preventive measures in place, and establishes a fair mechanism for addressing such incidents. Praxis Business School has established an Internal Complaints Committee (ICC) to fulfill this purpose. The ICC will function as a dedicated task force responsible for monitoring existing security measures and recommending additional security enhancements as needed.

2. Scope

2.1 Students, Employees/Consultants: This policy applies to all people associated with Praxis Business School, whether as full-time employees, temporary staff, ad hoc workers, daily wage workers, or students. It covers employees hired directly or through agents or contractors, with or without pay, and includes contract workers, probationers, apprentices, executive trainees, management trainees, and students.

2.2 Workplaces: The policy applies to our office / campus premises and any areas closely related to our workplace. It also includes places that students and employees visit for work-related purposes, even if it is outside regular office hours.

2.3 Visitors and Vendors: This policy extends to all visitors and vendors who come to our premises or whose premises our employees visit during the course of business.

The Internal Complaints Committee (ICC) is responsible for investigating complaints according to this policy and the law, ensuring a just and fair process, and submitting their findings to the relevant employer(s), as needed. The employer / Institute holds the authority to take action against anyone found responsible, while the ICC's role is to provide guidance for justice.

This policy covers any behavior perceived as harmful to a healthy and friendly work environment. It applies when both the alleged harasser (the Respondent) and the person reporting the harassment (the Complainant) are employees or consultants of Praxis Business School.

If any student or employee experiences sexual harassment in a place outside their regular workplace or our extended workplace, the Institute is responsible for assisting, supporting, and helping the employee to address their complaint.



3. Guidelines

It is mandatory on all students, employees / consultants to follow this policy and the guidelines formulated herein. Sexual Harassment at the work place will be deemed to be a violation/breach of terms of employment, and a criminal offence in addition to violation of gender equality guaranteed under the constitution.

4. Definition of Sexual Harassment:

One or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- 4.1 Physical contact or advances; or
- 4.2 A demand or request for sexual favours; or
- 4.3 Making sexually coloured remarks; or
- 4.4 Showing pornography; or
- 4.5 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, among other circumstances if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in their employment; or
- Implied or explicit threat of detrimental treatment in their employment; or
- Implied or explicit threat about their present or future employment status; or
- Interference with their work or creating an intimidating or offensive or hostile work or environment for her; or
- Humiliating treatment is likely to affect their health or safety.

5. Definitions for reference:

Complainant: can be a person who has been subject to Sexual Harassment and / or any person reporting an incident of Sexual Harassment. A third party can also be a Complainant, however, a written Complaint from the person who has been subject to sexual harassment is mandatory to be filed with the ICC as the case may be.

Respondent: The person who is alleged/reported to have committed an act of Sexual Harassment.

6. Preventive Measures

6.1 Workshops and Regular Meetings: Praxis Business School organizes workshops on Sensitization regarding Sexual Harassment at Workplace. These workshops have been held on specific dates, and the committee decides to meet regularly. Meeting minutes (MoM) will be prepared and submitted every year or as decided by the committee. The meeting should have



at least three members present or fifty percent of the total committee members, whichever is higher.

6.2 Sensitization Programs: Praxis Business School conducts sensitization programs and workshops for all students, employees, including special meetings for women. These programs aim to:

- Raise awareness about the right to a safe and healthy work environment.
- Disseminate information through publications, advertisements, or meetings.
- Discuss challenges women may face at work.
- Increase awareness and encourage open discussions about Sexual Harassment.
- Provide assistance to complainants if they need to file a complaint.

6.3 Students and Employee Safety: Implement a system to record the names of students employees staying late (after 8 PM) in the office and their reasons. Security personnel will make regular rounds every half-hour post 8 PM to ensure safety.

6.4 Record Keeping: Maintain records of all cases related to sexual harassment and their outcomes.

6.5 Display Legal Provisions: Display information about the legal provisions related to sexual harassment in prominent locations within the institution.

7. Reporting of Sexual Harassment Complaints

Any aggrieved person who feels / presumes that he / she has been subject to sexual harassment by a person, including a student, supervisor, manager, employee of other organisation or vendor by way of any action or words should immediately report or complain the incident to the ICC as set forth below as the case may be or to any member of ICC within three months from the date of occurrence of the said incident and in case of a series of incidents within a period of three months from the date of the last incident. Delay in reporting makes it more difficult to establish the facts of a case and may contribute to the repetition of offensive behavior. If a Complaint cannot be made in writing, any member of the ICC shall render all reasonable assistance to the aggrieved person for making the Complaint in writing.

8. What are the possible actions that can be taken against the respondent?

- Warning
- Written apology
- Written assurance of good behaviour
- Stopping of increments/promotion
- Suspension
- Dismissal



9. Complaint Mechanism

9.1 A person who has been subject to Sexual Harassment may make in writing a Complaint email icc_chairperson@praxis.ac.in of sexual harassment at the workplace to the Committee within a period of three months from the date of incidence and in case of series of incidences within a period of three months from the date of the last incidence. Provided that where such Complaint cannot be made in writing, the presiding Chairperson or any member of the ICC shall render all reasonable assistance to the Complainant for making the Complaint in writing.

9.2 If the Committee is satisfied that the circumstances were such that prevented the Complainant from filing the Complaint within the said period they can extend the time limit not exceeding three months.

10. Confidentiality

The Institute will do everything consistent with the enforcement of this policy and with the law to protect the privacy of the individuals involved and to ensure that the Complainant and the Respondent are treated fairly. Information about individual Complaints and their disposition is considered confidential and will be shared only on a “need to know” basis. However, the ICC members and / or Institute shall not be held responsible under the present confidentiality clause in the event the Complaint is filed by a third party and / or material facts with regard to Complaint are already known to other persons / individuals.

11. Conciliation and Settlement

Before initiating an inquiry, the ICC may, at the request of the aggrieved person, take steps to arrive at a settlement between the parties. However, no monetary settlement can be made as the basis of such conciliation.

12. Inquiry Process

12.1 When a complaint is received:

- ICC initiates the inquiry as advised by the Chairperson shortly after receiving the written or emailed complaint. Detailed information and explanations are sought from both the Complainant and the Respondent separately by the ICC.
- The inquiry proceedings are documented through minutes and/or video recordings, which are kept for records.
- The ICC reviews the report and may order a full inquiry into the complaint if necessary.
- The ICC should discuss the Complainant's expectations and offer the option of conciliation before initiating the inquiry.



- Once the inquiry starts, conciliation is no longer an option. The ICC reviews the findings and addresses the complaint as per the policy and the law, aiming to resolve it within 90 days from receiving the complaint.
- Detailed findings and recommendations are submitted to the Institute.

12.2: If the Complainant repeatedly fails to appear before the ICC or respond to inquiries for three consecutive events, the ICC may close the inquiry and must document the reasons. If the Respondent deliberately avoids appearing before the ICC, the Institute or their appointed representative should instruct the Respondent to attend. The ICC makes a decision based on the evidence, witness statements, and material objects, if any. If no eyewitnesses are present, the ICC needs a minimum of nine committee members to resolve the claim based on credibility and circumstantial evidence. The Institute may seek clarification on the ICC's recommendation and must implement it. The final decision is communicated to both the Complainant and the Respondent. An inquiry can continue even if legal proceedings are initiated regarding the complaint.

12.3. No Monetary Settlement: Conciliation cannot be used as a basis for monetary settlements.

13. Procedure of Submission

The enquiry Committee / Member/s of the Committee should be prepared to deal with the Complainant's embarrassment and anger by patiently, but firmly, explaining the detail and documentation that are needed for an accurate enquiry.

13.1 The Complainant should be interviewed first, to ensure that all-important details and witnesses are identified promptly and if any material object is provided the same should be received, numbered and preserved.

13.2 It is important for the ICC to be objective and non-judgmental and allow the Respondent to respond to each allegation. The ICC should inform the Respondent of the type of disciplinary action that may be taken if the Complaints are found to be true.

13.3 Both parties should be told to avoid contact with one another, and ways to minimize contact should be implemented.

13.4 In the event that the Complaint has been filed against the reporting manager or any person placed higher in the hierarchy, then during the course of enquiry the Complainant may:
a) Either seek a transfer; OR b) Take leave from employment for a maximum period of 3 months.

13.5 The Complainant should report any further incidents of harassment or retaliation during the continuance of enquiry.

13.6 Witnesses should be told as little as possible about the details of the Complaint in order to maintain confidentiality under the Policy.



14. Professional Consequences of Violation of the Policy

14.1 Any student or employee, supervisor or manager who is found to have violated the harassment policy shall be subject to appropriate disciplinary action.

14.2 The Institute shall not tolerate any form of retaliation against any student or employees for bringing bonafide Complaints or providing information about harassment.

14.3 However, as per the findings of the enquiry of a Complaint, if it is found that the Complaint was false or was made with a mala fide intent, the Complainant may be subject to disciplinary actions, up to and including termination.

14.4 If any act of sexual harassment occurs as a result of an act or omission by any third party or outsider, the respective Institute will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

Committee composition:

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