



POSH POLICY

MANASADHARA TRUST

8th July 2026 Approved By the Board

Address: - Manasadhara Trust
No. 77-45, 100 feet Road,
A-Block, 1st Parallel Road,
Gopala Gowda Extn, Sagara Road,
Shimoga - 577204

Contact No :-6362367063

Email ID :-posh.manasa@gmail.com

PREVENTION OF SEXUAL HARASSMENT POLICY of MANASA GROUP OF INSTITUTIONS

The Manasa group of institutions include Manasa Hospital, Manasadhara Trust (R) (Manasadhara, Mukunda, Manaspoorthi).

This document is of **Manasadhara Trust(R) Rehabilitation Centre for the Mentally Challenged**

Manasadhara Trust, a non-governmental organization registered under the Indian Trusts Act, 1882 Registration Act, was established in the year 1996.

INTRODUCTION TO THE TRUST:

Manasadhara trust ® was established in the year 2006 by the Late Dr K A Ashok Pai, a psychiatrist, writer, film maker and thinker. Mental health in India is largely a neglected and stigmatised area. The population in need is very large as compared to the resources available for treatment. It is also true that the care for mental ill health varies from physical ailments in the treatment protocols, the long duration of treatment (in many cases) and rehabilitation which requires expertise and a sense of long-term commitment. The WHO recommends 3 psychiatrists per 100000 populations. Currently the Indian ratio is 0.85 to 100000. Due to this gap, we end up treating mainly acute ailments. Long term care, psychosocial rehabilitation and integration of people with special needs into the mainstream society usually take a backseat. It is this gap that Manasadhara Trust aims to fill. The aims of the trust were to work in tandem with professionals in acute care to design individual specialised programs for different mental health concerns and to personalise care.

The first institute which was started by the trust was a psychosocial rehabilitation centre called Manasadhara. When clients recover from chronic psychiatric illnesses, they would have lost their jobs, their cognitive faculties and their socialising ability. At Manasadhara, we care for such clients and work towards improving their social, cognitive and vocational abilities so that they can return as a productive, functional and confident member of the society. We have a group of psychiatrists, clinical psychologists, psychiatric social workers, counsellors and special educators who cater to the needs of the patients.

1.Our vocational training programs are unique because they keep in mind the socioeconomic milieu of the community that the patients live in. We train patients in weaving, farming, mushroom cultivation, cooking and digital skills which they can use to make a living for themselves once they are out of the centre.

2. We help rehabilitate individuals with drug abuse with a special 21-day program designed by the team of experts. In an effort to sustain abstinence from the drug habit, we hold alumni meets every year of former patients who have successfully quit their habit and have now become respectable members of the society. This in turn motivates the current patients who are struggling with the same.

3. We work in collaboration with NGOs like Craftizen and Amba computers to help Clients learn occupations like making Holi colours from left over flowers in the temples, crafts for gifting and digital skills which can then translate into an occupation once they are ready to go back home. Keeping in mind the financial difficulties of our Clients families (which happens commonly when the earning member of the family falls mentally ill for a long time), we have 15 % of the beds reserved for Clients who will be taken care of at the expense of the trust (apart from their food costs).

4. After the covid pandemic, we realised the need for special rehabilitation services for the geriatric mentally ill. With the burgeoning geriatric population in India and the advent of nuclear and double income working families, older adults with mental illness are often side-lined and difficult to care for. Patients with dementia, stroke and chronic mental illnesses need extra care and support which is time consuming. Expensive and causes burn out in the care takers. Hence, we started Mukunda, a 50-bed centre for geriatric patients with special needs with a team of dedicated, trained and caring staff.

A typical day at this centre is more laid back with sessions in light yoga, play therapy, physiotherapy, cognitive retraining, spiritual sessions and community interactions by way of holding concerts and plays within the centre. The centre is surrounded by a well curated garden which gives the space a warm cozy feeling, something which we feel our older patients thrive in. We have collaborations with multiple centres in Shivamogga which perform dance, music, plays for the patients which helps bring them closer to the community as well.

5. Another area of the mental health spectrum that we have ventured into is children with special needs. Started in 2016, **Manaspoorthi**, which started off as a resource center, is now a special school. The center was started as provision for a safe space to children coming from economically vulnerable and dysfunctional family backgrounds. The center was equipped with a library, computers and counsellors who had the skills to help out in areas of career, behavioural problems and emotional distress. India is among the few nations which has a huge population of young adults. But in today's world, children, teenagers and young adults are faced with myriad problems such as academic difficulties, drug abuse, addiction to technology and many others. Children who come from dysfunctional families where parental drug addiction fights and financial difficulties cause

distress are largely left to fend for themselves. At Manaspoorthi, we have two wings. One, to help children with intellectual difficulties and learning disability and the second, a centre where children can come and spend time with counsellors and learn to use technology and have access to a well curated library which can help shape their future. We cater mainly to the children who come from difficult circumstances and hence most services are given at nominal costs and sometimes for free.

- We hold a 15-day free summer camp once a year in which integrate normal children with special children which helps in cultivating a sense of inclusivity. We partner with organizations like Namma halli theatre, Agasthya foundation, Ishanya foundation, FM radio, Samanvaya and IMA Shivamogga to provide the children with varied, interesting and useful experiences during the time. We run programs of Jan Shikshana Samsthe (JSS) which trains our children in tailoring, mobile repair and Amba computers which trains them in digital skills so that they can be employed.
- We help train out of school children in appearing for their NIOS and KOS (open schooling programs) exams. We also conduct outreach programs for Government school teachers, students and CREs educating them about topics like identifying intellectual disability and learning difficulties, handling exam stress and good parenting practices. The centre has so far conducted about 300 plus programs for the same.

6. As of today, statistics state that Shivamogga stands second in the number of child marriages and third in registration of POCSO cases in the state. We see that girl children after class 10 or 12 drop out of school and start working due to economic difficulties, lack of facilities and cultural norms. Many a times, these children are victims of child marriage and early pregnancies. As a part of Manasadhara trust's initiative, we have started a diploma program for girl children from rural and lower socio-economic backgrounds. "Diploma in patient care assistance" is a course recognised by the National council of vocational research and training (NCVRT). It is a two-year program which involves both theory and practical training as nursing and geriatric care assistants. The beneficiaries of this program are given free board, lodge and teaching programs for a span of two years followed by an internship of one year. A monthly stipend is paid to them since their first month into the course. Manasadhara has trained about 150 girl students so far, who now work in various hospitals across the state and in peripheral clinics.

The trust is committed to scaling its services by transitioning from just clinical intervention to a holistic community integrated model. Future initiatives prioritise technological integration and providing tele counselling services to the remote peripheries. The trust also remains dedicated to dismantling the systemic stigma and

trying to ensure that every individual with an intellectual disability or mental illness is treated with respect and dignity.

Manasadhara has a multi-disciplinary team consisting of psychiatrists, neurologists, clinical psychologists, physiotherapists, counsellors, general physician, consultant diabetologist, nurses, special educators and skill imparting specialists. They help in identifying the abilities of patients, so that adequate and appropriate support is provided to maximize their functioning capabilities. After assessment, individualized support plans are designed, considering social, emotional behavioural and cognitive needs of the patient's family. The communication difficulties experienced by many of these people compounds the distress. Hence, special emphasis is paid to managing inter personal relationships, communication and behaviour management skills.

As a part of best practices, Manasadhara trust has formulated a posh policy which the trust is committed to abiding by.

1. Introduction and Objective

Manasadhara Trust aspires to create a workplace free from harassment in any form, based on factors such as gender, caste, colour, religion, age, national origin, ancestry, disability, veteran status, marital status, sexual orientation or any other employment status protected by applicable law. To maintain a safe and inclusive work culture, Manasadhara Trust takes a zero tolerance stance on this behaviour.

- To ensure that all staff, interns, volunteers, consultants and members of the Governing Board work together, own the responsibility and share accountability to encourage the development of an ethos which respects the dignity and human rights of all persons in all its dealings and in all settings in which they work
- To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees.
- The establish guidelines as per the guidelines of “The prevention Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013. The same has been added as an appendix for this document.
- Though the law does not include sexual harassment for male employees, Manasa adopts a gender-neutral policy for prevention of sexual harassment.

2. Scope and applicability

Manasadhara Trust/ Manasa Hospital aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure

at Manasadhara Trust/ Manasa Hospital towards any other person being an employee of Manasadhara Trust/ Manasa Hospital, patients, their relatives, student interns or contract employees in the hospital premises or elsewhere when they are working on behalf of the organization or in social circumstances. The policy applies to all employees of Manasadhara Trust.

3. Definitions.

- a) Employee– Includes person male/female/ Transgender carrying out any work on behalf of Manasa and may have been hired as Permanent, Temporary, Contracted or on Retainer Ship Basis, part-time basis etc., either directly or indirectly or through vendor organization.
- b) Sexual Harassment – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behaviour, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in a manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behaviour which is generally considered to be derogatory . This would include physical harassment (touching inappropriately, smacking, brushing, holding hands unnecessarily, staring inappropriately, staring at odd body parts), verbal (using sexually loaded words to address the other person, whistling, catcalling, phone sex, sexting, talking with innuendos- double meaning, sending pornographic images and videos, forcing to watch pornographic videos, asking for sexual favours, forcing into a romantic relationship) and emotional (spreading rumours, character assassination, emotional blackmail for sexual favours, taking photos or videos without consent)
- c) Aggrieved person - In relation to workplace, a woman/man/ transgender person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- d) Respondent: Employees against whom the complaint has been filed.
- e) The act covers all working places of Manasa, including residential campuses.

4. Date of adoption:

This policy adopted on 9th July 2026 after being presented and deliberated at the meeting of the Governing Board.

5. Applicability:

The following persons come under the purview of the POSH Policy:

- Members of the Governing Board
- Employees
- Volunteers, interns,
- Consultants, and
- Visitors who come to Manasadhara Trust premises for any purpose

6. Dissemination:

- This POSH Policy is a public document and is available on our website, and on request at our Human Resources Department or any of our offices.
- It is officially handed over to all new recruits, volunteers, consultants and interns and is an official part of any agreement with our partners.

7. Assistance and Contact Information:

- For any assistance or clarification regarding this policy please contact the POSH ICC Committee at: [6362367063](tel:6362367063) or at posh.manasa@gmail.com

8. Duties of Employer:

The Act enlists the duties of the employer as follows:

- ▶ Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- ▶ Display at any conspicuous place in the workplace, the penal consequences of sexual harassments ,
- ▶ Organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed.
- ▶ Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- ▶ Assist in securing the attendance of respondent and witnesses before the Internal Committee.
- ▶ Make available such information to the Internal Committee as it may require having regard to the complaint made
- ▶ Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita (BNS) or any other law for the time being in force;

- ▶ Cause to initiate action, under the Bharatiya Nyaya Sanhita (BNS) or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;
- ▶ Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct;
- ▶ Monitor the timely submission of reports by the Internal Committee.

9. Internal Complaints Committee (ICC)

- To effectively address workplace sexual harassment complaints, a Complaints Committee must first be aware of their key responsibilities, some of which are highlighted below:
 1. be thoroughly prepared
 2. Know the Act, Policy and/or relevant Service Rules
 3. Gather and record all relevant information
 4. Determine the main issues in the complaint
 5. Prepare relevant interview questions
 6. Conduct necessary interviews
 7. Ensure parties are made aware of the process and their Rights/responsibilities within it
 8. Analyse information gathered
 9. Prepare the report with findings/recommendations

10. Knowledge, Skills, Training for ICC Members

Dealing with workplace sexual harassment complaints is often complex. Hence Complaints Committee/s must possess critical skills/capacity to effectively carry out their role. That includes a sound grasp of the Act, Vishaka Guidelines, applicable Service Rules, relevant laws and an understanding of workplace sexual harassment and related issues. Complaints Committee skills must include an ability to synthesise information i.e. relevant documents, the law and interviews. They should also be able to communicate effectively, write clearly, listen actively and conduct interviews. They should be competent at showing empathy, being impartial and being thorough. They should be able to identify sexual harassment and its impact. A Complaints Committee/s is required to be trained in both skill and capacity to carry out a fair and informed inquiry into a complaint of workplace sexual harassment. An absence of such training will lead to unequal and unfair results, which can cost employers, employees, complainants as well as respondents.

- Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of:
- Presiding Officer - 1 member
- Internal Member - 2 members
- External Member - 1 member (NGO / Legal expert)

The members need to meet once in 4 months as a regular procedure and have a meeting whenever a complaint arises. The report of one year should be submitted to the district magistrate's office once a year by 31 January.

The committee is responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting enquiry as per established procedure
- Submitting findings and recommendations of enquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines

Complaint filing procedure:

A complainant (an employee of Manasadhara Trust) who believes he/she has been sexually harassed should:

- If comfortable to do so, inform the alleged harasser that his/her behaviour is offensive, unwelcome, against the organisation's policy and should stop.
- He/she should take a note of the date, time and location of the incident/s
- If not comfortable to confront the alleged harasser or if unwelcome behaviour continues, report to the nominated Complaint Redressal Committee

If this is inappropriate, speak to another senior member of the organisation, the head of the organisation or a member of the Governing Board within 3 working days of the complaint being received, the internal committee shall commence Official Internal Enquiry by:

- By informing the said complaint to the respondent.
- By instructing to stop the alleged act of Sexual Harassment immediately
- By informing not to reach out to the complainant directly or indirectly ➤ By asking an immediate explanation from him/her to the same

- Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by Manasa in order to stop the alleged act(s)
- Within 15 days from receipt of the complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counselling sessions with persons involved in alleged act(s) to the management
- A complaint will be closed no later than 90 days from receipt of complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.
- Employees are duty bound to assist in investigative steps; employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.
- Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

11. Redressal

Conciliation

- ▶ The Internal Committee may, at the behest of the aggrieved woman, before beginning its investigation take steps to settle the matter between the aggrieved woman and the accused through conciliation.
- ▶ No monetary settlement may be made through conciliation.

Guidelines for receiving a complaint

- ▶ Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and therefore it requires tact and discretion while receiving the complaint.
- ▶ A Committee member listens to the complaint and the complainant is assured that Manasadhara Trust takes the concerns seriously. Written notes are taken while

listening to the person and mostly words used by the complainant are recorded. Clear description of the incident in simple and direct terms is prepared and details are confirmed by the complainant. All notes are kept strictly confidential. Complainant's agreement is taken to proceed with the formal investigation.

The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.

When a complaint is received, the Complaint Redressal Committee will:

- Obtain and record a full, step-by-step account of the incident/s
- Ensure the organisation's process for handling the complaint is understood
- Ascertain the complainant's preferred outcome, e.g. an apology, the behaviour to cease, a change in working arrangements
- Agree on the next step: informal resolution or formal investigation
- Keep a confidential record of all details of this discussion and subsequent steps in the process.

Prohibition of Publication

- ▶ As per Sec. 16 the contents of the complaint, the identity and personal details of the parties involved, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the actions taken shall not be published, communicated or made known to the public, press and media.

Any person, who is entrusted with the above documents, shall be liable for penalty, in accordance with the provisions of the service rules, if he/she contravenes regulations.

Termination of inquiry

- a. An amicable resolution of the complaint is possible only with the written consent of the complainant.
- b. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
- c. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the organisation as a whole.

- d. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.

Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by chairperson of the ICC. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

12. Confidentiality and protection

The meetings shall be held in strict confidentiality and preferably in another wing of the organization. The organization will try to protect the victim from further threats and shame as much as possible. If the harassment continues, then a formal complaint will be registered with the police and the perpetrator/s will be terminated from duty immediately. For the same reasons, the organization follows a policy of avoiding romantic relationships between members of the same organization. If there are any such consensual relationships, it would be advised to inform the HR asap by the involved persons. The decision of the future of the employees in such cases will be done by the management. This would avoid the risk of harassment in the future if the relationship is not successful.

13. Disciplinary action

The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but is not limited to, ➤ Warning ➤ Written apology from offender, ➤ Bond of good behaviour ➤ Transfer ➤ Debarring from supervisory duties ➤ Denial of employee benefits like increments/promotion/salary correction etc. ➤ Cancellation of specific work Assignment ➤ Suspension ➤ Dismissal

14. Monitoring and review

This Policy and Procedure will be reviewed whenever required from the date of implementation. Reviews will be initiated by the HR Department. Where changes in employment legislation occur that directly affect this Policy, these will be reflected with immediate effect and communicated through HR.

About SHe-Box :- (Sexual Harassment electronic Box) is a centralized online platform

Launched by the Government of India's Ministry of Women and Child Development. It allows women across public, private, organized, and unorganized sectors to confidentially report and track complaints of workplace sexual harassment.

Key Features & Information:

- Access Open to all working women, including domestic workers.
- Complaints are directly routed to the relevant Internal Committees (IC) or Local Committees (LC).
- Registration: All organizations with more than 10 employees must legally register their Internal Committees on the platform.
- Tracking: Users receive a unique complaint ID to track the real-time status of their grievances online.
- Mobile Multilingual: Available on Android and iOS via the Mission Shakti app and supports up to 23 languages.
- To file a complaint, track an existing case, or register your organization committee,
- Visit the official SHe-Box Portal. For more details on the initiative background and legal mandate, read the official SHe-Box Guidelines.

15. Conclusion

There is an official obligation and an individual obligation to fulfil the intent of this Policy. The Policy will be prominently displayed in all Manasadhara Trust office premises and it is expected that every employee will have a working knowledge of permissible activities in the work place and will seek guidance from HR department.

Details of Manasadhara Trust Internal Complaints Committee members are mentioned below:

- ▶ “Presiding Officer” – Senior Woman employee.
 - ▶ **Chairperson:** Mrs. Veena Kumari
- ▶ Min. 2 members from employees who have had experience in social work or have legal knowledge or are committed to the cause of women.
 - ▶ Mrs. Nagarathana
 - ▶ Mrs. Deepika M
- ▶ Manasadhara Trust Middle Management
 - ▶ Mr. Shivu Kumar

- ▶ One member from Governing Board
 - ▶ Dr. Rajani A Pai
- ▶ One External Member
 - ▶ Mrs. Veena Swamy

16. Appendix

The following supporting documents are attached as part of this report:

- Appendix A: POSH (Prevention of Sexual Harassment) Policy Document
- Appendix B: Vishaka Guidelines for the Prevention of Sexual Harassment at the Workplace.

