

**Safe Workplaces by Design:
A Leadership Imperative in Risk
Governance**

MID-YEAR POSH REVIEW CONSULTATION & TRAINING

Strengthening Workplace Governance Together

P/ PRABHAVEE
Partner for Social Impact



**Building stronger workplace governance by fostering
consultation, transparency, and shared accountability.
Workplaces grounded in dignity & respect.**

P/ PRABHAVEE

Partner for Social Impact

SAFE WORKPLACES BY DESIGN:

A LEADERSHIP IMPERATIVE IN RISK GOVERNANCE

Mid-Year PoSH Review Consultation & Training

Building Better Governance: Consultation Outcomes

KEY REFLECTIONS AND THE WAY FORWARD

AUGUST 2026

BY P/ PRABHAVEE



AUTHORS

Rohaam Thyagaraju V, a final-year law student, Symbiosis International University, Hyderabad, Research Assistant, P/ PRABHAVEE, with editorial inputs from **Anumita Sarkar**, Founder, P/ PRABHAVEE and **Advocate Suruchi Kumar**, Founder, SKLC, Labor and Employment Law Expert.

PUBLISHER P/ PRABHAVEE

PUBLICATION DATE 3 August 2026

DISCLAIMER

The views, observations, and recommendations contained in this report are based on the consultation proceedings and the professional judgment of the authors at the time of publication. They are intended to support discussion, learning, and informed decision-making and should not be construed as legal advice or as a substitute for independent professional advice. Readers are encouraged to consider the specific facts, applicable legal requirements, and organisational context before implementing any recommendation. The authors and P/ PRABHAVEE accept no liability for any loss or consequences arising from reliance on this report.

COPYRIGHT

All images, content, and reproduction or use in any form, print or digital, is strictly prohibited without prior written permission. All Rights Reserved.

ACKNOWLEDGMENTS

P/ PRABHAVEE collaborated with Advocate Suruchi Kumar in the design, facilitation, and execution of the consultation, as well as the development of this report. We extend our sincere appreciation for her valuable expertise and contributions throughout the process.

We also express our sincere gratitude to Rohaan Thyagaraju V for his continued engagement with P/ PRABHAVEE and for his thoughtful research support, which contributed meaningfully to the preparation of this report.

We thank all contributors, experts and professionals for their time and valuable insights shared during the consultation.

HOW TO CITE THIS REPORT

Thyagaraju, R, Kumar, S & Sarkar, A (2026). Building Better Governance: Consultation Outcomes, Safe Workplaces by Design: A Leadership Imperative in Risk Governance – Mid-Year PoSH Review Consultation & Training. P/ PRABHAVEE (India).

BACKGROUND

Responsible Business is a shared risk. It demands clarity on how stakeholders in an organisation understand their roles, responsibilities, influence, and impact on people across value chains.

P/ PRABHA means impact and **PRABHAVEE** influences.

P/ PRABHAVEE supports this shift by helping organisations interpret and navigate risk, strengthen governance and accountability, and embed ethical systems, processes, and practices with clarity and intent across operations and supply chains.

P/ PRABHAVEE, founded and led by lawyer Anumita Sarkar (independent policy and strategic advisor), is a Delhi-based strategy consulting practice working at the intersection of policy, law, and business strategy. P/ PRABHAVEE focuses on Human Rights and Responsible Business, and achieves this through strategic advisory and guidance, multi-stakeholder initiatives, facilitation, consultations, training & capacity building, and strategic programmes. Since 2022, P/ PRABHAVEE has engaged in strategic consultation with close to 20 CSOs, NGOs, social impact start-ups, including mid-to-established organisations, and has engaged with over 40 organisations, including 5 Higher academic institutions and universities, collaborating with more than 120 experts across the social sector, academia, and public policy. It has trained over 1100 individuals and certified close to 100 individuals in the prevention of sexual harassment of women at the workplace.

P/ PRABHAVEE contributes to global standard-setting and policy processes, including regular participation in GRI standards development consultations, submissions to the UN Working Group on Business and Human Rights, and pre-consultations with UNDP for Annual UNRBHR Forums. Its recent engagements include input on the EU Forced Labour Regulations, alongside contributions to a range of national and international policy and stakeholder consultations.

P/ PRABHAVEE undertakes a range of knowledge, training and facilitation activities. It designs and facilitates capacity-building workshops and multi-stakeholder convenings, and delivers compliance training for corporates. Its mission is to serve as a trusted strategic partner, enabling businesses to embed responsible practices and human rights commitments at the core of decision-making. It seeks to equip companies, businesses, including MSMEs and SMEs, Brands, Suppliers, and other relevant stakeholders with insights, recommendations, leadership strategies, capacity-building, and training they need to build lasting impact—helping them strengthen institutional capacity, governance, and partnerships.

P/ PRABHAVEE works with diverse stakeholders, including companies of all sizes, academic institutions, civil society organisations, research and advocacy centres, multi-stakeholder platforms, UN Agencies, working groups, and coalitions, to translate the complexity of the nexus of business and human rights into an actionable strategy.

To strengthen corporate accountability, we continue to build a multi-disciplinary network of professionals, consultants and experts committed to embedding responsible practices that uphold and protect the voices of rights-holders.

CONTENTS

Annual Roundtable	2
Authors and Acknowledgments	3
Background	4
Contents	5
About the Consultation	6
Purpose of the Consultation	6
Why does a mid-year review matter?	6
Objectives	6
I. Participant Profile	7
II. Methodology	7
III. Key Themes discussed	8-9
1. Transitioning from compliance to institutional capability	
2. Closing the gap between policy and practice	
3. Strengthening the effectiveness of the Internal Committee	
4. Anonymous Complaints, Retaliation, and Trust in the Organisation	
5. A new perspective on the term: "workplace"	
6. PoSH policies with governance and corporate risk	
IV. Emerging Insights	9-10
1. Mere compliance is not enough to ensure workplace safety	
2. Leadership accountability is important for PoSH governance	
3. Organisation trust defines the reporting behavior	
4. Changing Nature of a Workplace	
5. Data-Driven Governance Reinforces Preparation of Institutions	
6. Internal committee needs constant Investment	
V. Priority Actions for Organisations: The Roadmap	11-12
1. Immediate Priorities: Next 90 Days, 3 Months	
2. Mid To Long Term Priorities: 6-12 Months	
VI. Strategic Reflection: Questions for Leadership	13
VII. Looking Ahead	14
VIII. Appendix	14-24
Annexure 1: Workshop Agenda	
Annexure 2: Landmark Judicial Developments Discussed	
Annexure 3: Suggested Readings	
Annexure 4: Results from Self-assessment Questionnaire	
Annexure 5: Anonymous Participant Reflections	
Annexure 6: Glimpse from the Workshop	
IX. Concluding Note	24
X. About Guest Speaker	24
XI. About the Organiser	25
XII. Speakers	26

ABOUT THE CONSULTATION

More than a decade after the adoption of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act 2013, organisations continue their struggles with challenges beyond statutory compliance. Although most organisations have introduced PoSH policies and formed internal committees, they still face obstacles such as gaps in service delivery, inconsistent inquiry procedures, shifts in workplace practices, and low confidence in reporting. In this context, **"Safe Workplaces by Design: A Leadership Imperative in Risk Governance – Mid-Year PoSH Review Consultation & Training"** took place on **July 17, 2026**, a 3-hour consultation-style online workshop intending to convene legal experts, internal committee members, HR leaders, leadership and management officials, and practitioners in the field of workplace governance for a closed-door discussion on organisation's approach and response to workplace sexual harassment. The consultation was followed by intensive training on PoSH.

PURPOSE OF THE CONSULTATION

This consultation was a mid-year governance review focused on evaluating organisations' approach to PoSH compliance, risk management initiatives, leadership accountability, and workplace culture. With the help of interactive discussions, case studies, judicial developments, and practical cases, participants analysed implementation difficulties, assessed new legal developments, and found ways to make improvements in their organisations. The consultation has proved that the prevention of workplace sexual harassment is possible with a sustained leadership commitment, institutional accountability, and continuous organisational learning.

WHY MID-YEAR REVIEW MATTER?

A mid-year review enables organisations to assess implementation progress, identify recurring risks and compliance gaps, evaluate the effectiveness of Internal Committee processes, and recalibrate workplace policies and practices before year-end, ensuring that PoSH remains an ongoing governance priority rather than a periodic compliance exercise.

OBJECTIVES

- Review organisational PoSH implementation and compliance practices.
- Strengthen internal committee capacity and inquiry processes.
- Examine emerging legal developments and workplace governance trends.
- Identify implementation gaps, organisational risks, and recurring patterns.
- Analyse priorities for strengthening workplace safety and accountability.

I. PARTICIPANT PROFILE

The consultation brought together a diverse group of stakeholders: PoSH Internal Committee Members, Legal Professionals, Human Resources, Ethics and Compliance Professionals, Senior Leadership, representatives from NGOs, and other practitioners working in the field of workplace governance and employee well-being. A total of **15 professionals** joined the closed-door consultation and Mid-year training.

II. METHODOLOGY

An anonymous self-assessment questionnaire: **"Beyond Compliance Reporting: Whether organisations are effectively identifying, preventing, mitigating, and governing workplace sexual harassment risks"**, was circulated to the participants to support reflection, assessment, and future planning.

This mid-year review questionnaire was designed as a strategic self-assessment and risk governance tool to help organisations evaluate the effectiveness of their PoSH implementation beyond statutory compliance. This exercise was strategised to encourage leadership, Internal Committee members, HR teams, and key stakeholders to reflect on emerging workplace risks, organisational culture, reporting mechanisms, inquiry processes, and preventive measures. The broader objective was to identify strengths, gaps, and areas where course correction is required, enabling organisations to develop their own roadmap for the next 6-12 months and support them in strengthening commitment to creating safe, respectful, and inclusive workplaces.

Advocate Suruchi Kumar, Labor and Employment Law Expert, Guest Speaker, conducted a Masterclass, **"Safe Workplace by Design - PoSH — From Compliance Mandate to Boardroom Priority"**.

The facilitated dialogue and interaction with the participants revolved around one key question: **"How should leadership reframe PoSH from compliance to risk governance?"**

She presented a roadmap during the consultation, which was shared in three Parts:



III. KEY THEMES DISCUSSED

1. Transitioning from compliance to institutional capability

A key point of the consultation discussions was the recognition of the importance of changing PoSH implementation from a mere compliance measure into a governance function. It became evident that while a vast majority of organisations have developed policies and formed internal committees as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal), Act, 2013 (PoSH 2013), implementation remained procedural rather than strategic. The discussions revealed that the process of creating a safe workplace goes beyond just paperwork and involves ensuring leadership buy-in, accountability at the institutional level, and establishing systems that can prevent, detect, and react to any wrongdoings in the organisation. The consultation called for shifting from a compliance-driven approach to a capability-based approach centred on developing organisational capabilities.

2. Closing the gap between policy and practice

Participants also noted the increasing gap between well-written PoSH policies and their implementation in organisations. The issue here is whether the continuously emerging automated and standardised policies are truly relevant for organisations or whether they are merely a symbol of compliance. Among the main reasons for failure of implementation, participants mentioned lack of awareness, inconsistent approach, insufficient training for Internal Committees, and weak leadership.

3. Strengthening the effectiveness of the Internal Committee

The consultation underscored the crucial role of the Internal Committee in the PoSH architecture and pointed out the issues associated with uniformity, neutrality, and legal readiness. Discussions revolved around challenging inquiries, documentation requirements, workplace relations, and the tension between confidentiality and fairness. Overall, the consultation made it clear that capacity development, practical exercises, and process reviews must be ongoing.

4. Anonymous complaints, retaliation, and trust in the Organisation

The discussion focused on anonymous complaints and the circumstances that create them. Participants asked whether anonymous complaints could be lodged within existing legislation and how to balance the need for natural justice with organisational accountability. Another point made was concerns about retaliatory measures; hierarchy in the organisation, performance evaluation, and power imbalance. These constitute an obstacle to reporting cases and therefore need to be addressed through the introduction of stronger whistleblower rights and mechanisms not allowing for retaliation.

5. A new perspective on the term "workplace"

In relation to the advancement of the term "workplace" according to the PoSH Act amidst changing work environments and judicial interpretation, the consultation reviewed cases of cafés, hotels, travel-related work, virtual meetings, social interaction aimed at securing business success and other situations when working relationships rise beyond conventional office premises. Here, the evolving judicial directions on the interpretation of the term 'workplace' were analysed together with the practical aspects of work-related interactions taking place outside traditional office settings. The key point that emerged from this discussion was the need for organisations to implement policies that reflect modern ways of working while ensuring legal clarity. It was also established during the consultation that each complaint would need to be analysed thoroughly to derive its nexus with the 'workplace' of the employer.

6. PoSH policies with governance and corporate risk

A major point during the consultation was understanding the importance of PoSH in terms of enterprise risk governance. Participants examined the effect of workplace sexual harassment on the organisational culture, employee trust, risk of litigation, compliance with regulations, corporate reputation, and investors' visibility of governance data. The discussions also revolved around issues of the growing importance of Board supervision, Business Responsibility and Sustainability Reporting (BRSR), leadership accountability, and regular risk evaluation in organisations. The consultation established that workplace safety is a governance issue.

IV. EMERGING INSIGHTS

The consultation witnessed several strategic insights that reflect the evolving landscape of workplace governance under the PoSH framework. Rather than identifying isolated compliance concerns, the discussions revealed broader institutional challenges requiring sustained leadership attention and systemic reform.

1. Mere compliance is not enough to ensure workplace safety

Participants agreed that compliance is just a necessary base for any organisation to fulfil its legal responsibility. Policies, internal committees, and obligatory training are not enough for the proper implementation of their responsibilities. The real safety at the workplace relies on the organisational culture, leadership undertakings, correct procedures, and constant organisational learning.

2. Leadership accountability is important for PoSH governance

One important idea that emerged from the discussion was that responsibility for workplace safety does not rest solely with the Internal Committee or the HR department. The top managers and leaders of the organisation play key roles in shaping the workplace culture, providing the resources, and making the decisions. PoSH should be dealt with at the level of governance. It requires organisation-wide ownership, with leadership, managers, and employees all playing an active role in fostering a safe and respectful workplace.

3. Organisational trust defines the reporting behaviour

The increase in complaints is considered proof of awareness and readiness to use the reporting mechanisms. However, at the same time, it was indicated by the participants that employees in many organisations do not feel encouraged to report because of the fear of punishment, the existing hierarchy, as well as the issue of confidentiality. This indicates a systemic cultural issue in the organisation rather than a compliance issue and needs to be dealt with seriously.

4. Changing nature of a workplace

Stakeholders believe that today's workplaces are more than just offices. Hybrid work, online communication, business trips, remote meetings, informal conversations, and social media use put more stress on the uncertainty around where the responsibility lies with the employer. As a result, companies have to devise flexible policies to meet the new challenges and to ensure that they comply with the law at the same time.

5. Data-driven governance reinforces preparation of institutions

Consultation highlights the significance of the fact that an organisation's data has to be used not only for compliance reporting but also as a tool for governance. Understanding the ways the complaints unfold, the complaint patterns, and the trends in timelines (such as around appraisal period/ performance review / bonus / promotion) allows organisations to detect the risks and to intervene before the situation becomes irreparable / damaging.

6. Internal Committee needs constant investment

Good investigations require much more than just legal knowledge. Stakeholders argued that internal committee members have to be trained in how to conduct sensitive talks, evaluate evidence fairly, keep the equity in the process, receive sufficient findings, and understand complicated interpersonal matters. Therefore, there should be regular investments in the above areas to maintain credibility and confidence in the institution.

V. PRIORITY ACTIONS FOR ORGANISATIONS: THE ROADMAP

A. IMMEDIATE PRIORITIES (NEXT 90 DAYS, 3 MONTHS)

PRIORITY AREA	RECOMMENDED ACTION
Policy Review	Review existing PoSH policies to ensure alignment with current legal developments, organisational practices, and emerging workplace risks.
Internal Committee Readiness	Assess composition, independence, training status, and procedural preparedness of the Internal Committee.
Risk Assessment	Conduct a mid-year review of complaints, reporting patterns, inquiry timelines, and recurring organisational concerns.
Reporting Mechanisms	Strengthen confidential reporting channels and reinforce organisational commitments against retaliation.
Employee Awareness	Deliver refresher awareness programmes for employees, managers, and leadership focusing on practical workplace scenarios rather than statutory provisions alone.
Documentation Practices	Standardise inquiry documentation, record management, confidentiality protocols, and procedural timelines.

B. MEDIUM TO LONG TERM PRIORITIES (6–12 MONTHS)

PRIORITY AREA	RECOMMENDED ACTION
Periodic PoSH Audits	Institutionalise annual or biannual PoSH audits to assess policy effectiveness and implementation quality.
Data Analytics	Develop mechanisms to analyse complaint trends, demographic patterns, recurring risks, and organisational vulnerabilities.
Leadership Oversight	Integrate PoSH implementation into organisational governance, risk management, and Board-level oversight processes.
Independent Review Mechanisms	An independent expert can be engaged to conduct an audit of POSH processes/ conduct anonymous surveys on employee satisfaction and handling of grievances. An ombudsperson in an organisation can be a point of contact for confidential discussions without going into the complete facts of the case, and instilling confidence and faith in employees before referring the matter to IC, apart from mediating and handling other HR grievances.
Continuous Capacity Building	Establish recurring training programmes, scenario-based simulations, and peer-learning initiatives for Internal Committee members and management.
Culture and Prevention	Embed workplace dignity, respectful conduct, and accountability within broader organisational culture, performance management, and leadership development initiatives.

VI. STRATEGIC REFLECTION: QUESTIONS FOR LEADERSHIP

As organisations continue to strengthen their workplace governance frameworks, the consultation encouraged leadership teams to move beyond compliance checklists and engage with broader questions of institutional accountability. The following questions are intended to support reflection, guide strategic discussions, and inform future organisational action.

- Does the PoSH framework of our organization act as a mechanism of governance or simply act as a compliance necessity?
- Are the employees assured (repeatedly, if necessary) of the proper, confidential, and retaliation-free handling of grievances?
- Is there enough degree of independence and competence of the Internal Committee to conduct legally correct inquiries?
- Have you examined complaints to identify trends and risks for departments or particular systemic challenges for the organization?
- Are our policies flexible enough to consider hybrid workplaces, digital communications, travelling for work, and other contexts?
- Is management regularly conducting reviews of PoSH implementation to consider it as a part of the organization's risk management approach?
- Are the awareness initiatives aimed at making managers and employees able to detect and deal with workplace misbehavior?
- Are the issues of accountability defined in all the management areas, including the HR department, internal committee, and senior management?
- To what degree does the organisation manage to combine confidentiality, procedural fairness, and transparency throughout the inquiry process?
- What concrete steps are going to be undertaken during the next six months to enhance workplace safety, institutional trust, and organisational resilience?

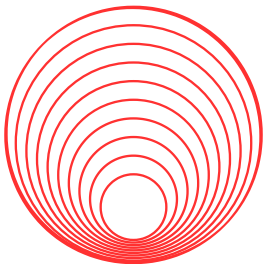
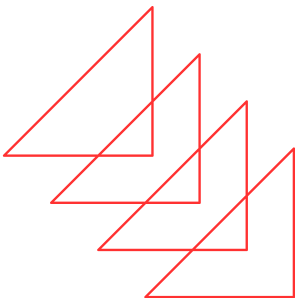
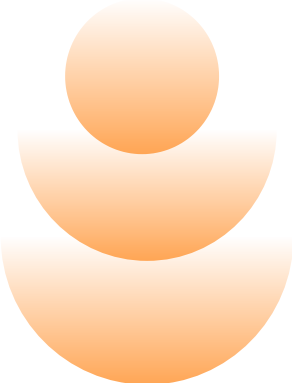
VII. LOOKING AHEAD

At the close of the consultation, it was acknowledged that the establishment of safe workplaces is an ongoing effort that calls for the willingness of the institutions to make a commitment. As workplaces, regulatory requirements, and organisational risks continue to evolve, organisations that embrace continuous learning and reflective practice will be better positioned to strengthen governance, resilience, and organisational effectiveness.

As companies enter the second phase of the year, the consultation notes the need for organisational leaders to consider this current period of time as an opportunity to reassess and simplify existing systems in their organisation. Continuous engagement, regular assessments, and collaborative learning will help organisations become legally compliant, ethically sound, and able to withstand the changing challenges of today's world.

VIII. APPENDIX

Annexure 1: Workshop Agenda

	02:00 PM	OPENING & SETTING THE CONTEXT	
	02:10 PM	EXPERT SESSION: Facilitated Dialogue with Advocate Suruchi Kumar	
	02:45 PM	MODULE 1 Refresher through scenario: Foundations of PoSH Law red presentation or main discussion.	
	03:15 PM	MODULE 2 PoSH in Grey Zone	
	04:00 PM	MODULE 3 Internal Committee in action: Compliance & Process	
	04:20 PM	MODULE 4 Role Play: Inquiry in Practice	
	04:40 PM	LIVE ASSESSMENT	
	05:00 PM	MID-YEAR COMPLIANCE RESET & CLOSE	

Annexure 2: Landmark Judicial Developments Discussed

**AURELIANO FERNANDES V. STATE OF GOA (2023)**

Nationwide compliance-verification directions reissued as recently as August 2025.

**SAURABH KUMAR MALICK V. COMPTROLLER & AUDITOR GENERAL OF INDIA (2025)**

Discussion on expanding interpretation of the term "workplace," including circumstances extending beyond conventional office premises. 'Workplace' is not limited to physical premises — any place directly connected to employment.

**DR. AMIT KUMAR VS. UNIVERSITY OF DELHI (2025)**

WhatsApp/ Facebook exchanges tied to a professional relationship fall within S.2(o) 'workplace.'

**SIDDHESH PRADEEP SATPUTE V. STATE BANK OF INDIA (2026)**

A shared autorickshaw not provided by the employer falls outside 'workplace' — jurisdiction is a threshold issue, not unlimited.

**NASHIK BPO CASE (2026)**

Multiple employees at a major IT/BPO campus alleged sustained sexual harassment by team leaders, reportedly spanning 2022–2026; nine FIRs registered, several arrests including an HR head.

**DR. SOHAIL MALIK V. UNION OF INDIA (2025)**

The complainant's own workplace IC has jurisdiction to inquire even where the respondent is a third party — Section 11's employee language is procedural, not jurisdictional. Enforcing the outcome outside your employment relationship still runs through contract.

**DR. MOHINDER KUMAR V. NABARD (2026)**

The complainant's own workplace IC has jurisdiction to inquire even where the respondent is a third party — Section 11's employee language is procedural, not jurisdictional. Enforcing the outcome outside your employment relationship still runs through contract.

Annexure 3: Suggested Readings

**Sexual Harassment of Women at the Workplace
(Prevention, Prohibition and Redressal) Act, 2013.**

**Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Rules, 2013.**

**Ministry of Women and Child Development
Handbooks on the PoSH Act.**

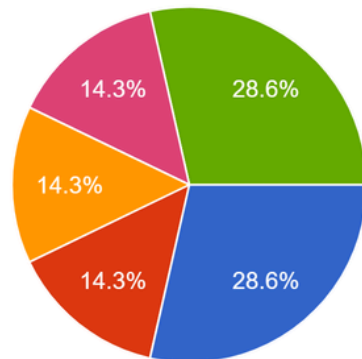
**Principle 5 of Business Responsibility and
Sustainability Reporting (BRSR) Framework issued
by the Securities and Exchange Board of India
(SEBI).**



Annexure 4: Results from Self-assessment Questionnaire

Which sector does your organisation primarily belong to?

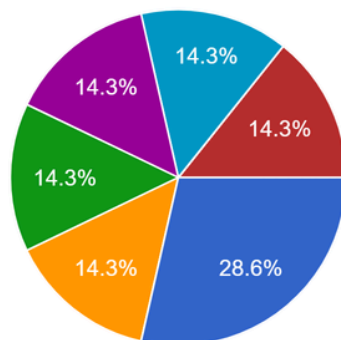
7 responses



- Corporate / Private Sector
- NGO / Non-Profit
- Educational Institution
- Government / Public Sector
- Development Sector / International Organisation
- Manufacturing
- Services
- Others

Which category best describes you?

7 responses

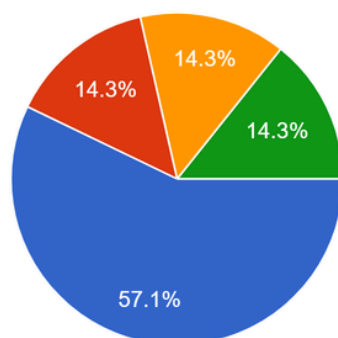


- Internal Committee (IC) Member
- Presiding Officer
- HR Professional
- Compliance / Legal Professional
- PoSH Trainer / Consultant
- External Member of PoSH Internal Co...
- Senior Management / Leadership
- ESG / Sustainability Professional

▲ 1/2 ▼

Approximate size of your organisation/workforce

7 responses

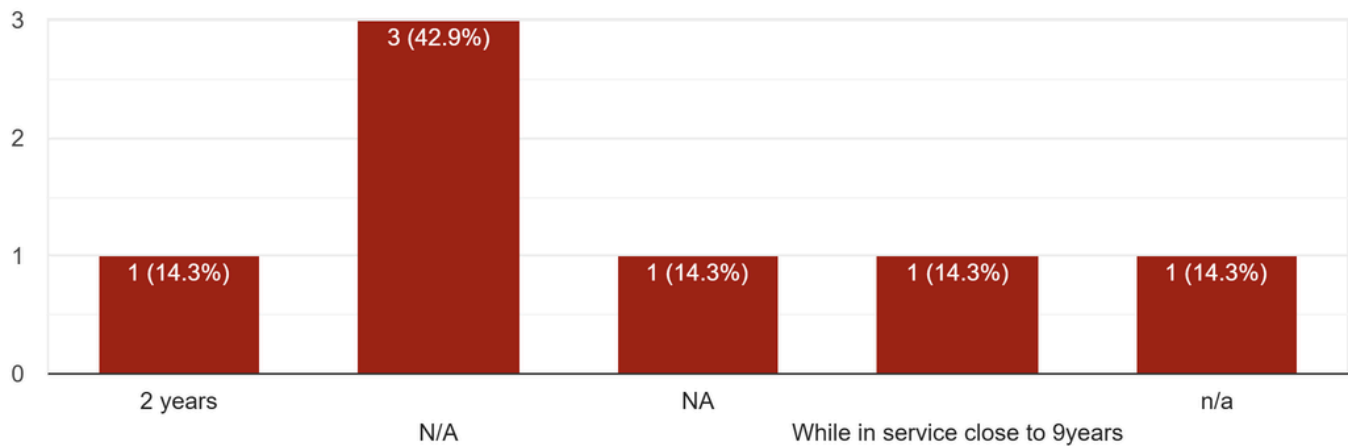


- Less than 50 employees
- 51–100 employees
- 101–500 employees
- 501–1,000 employees
- More than 1,000 employees

Annexure 4: Results from Self-assessment Questionnaire

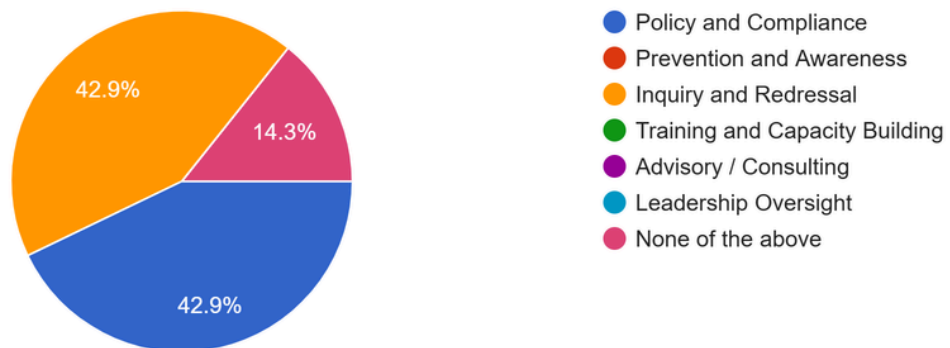
If you are an advisor, how long have you been involved in PoSH implementation? For those not applicable, write N/A.

7 responses



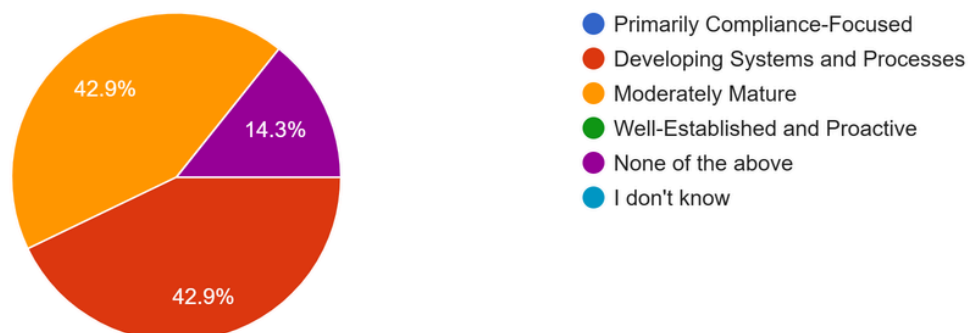
What best describes your current role in PoSH implementation?

7 responses



How would you rate your organisation's current PoSH implementation maturity?

7 responses



Annexure 4: Results from Self-assessment Questionnaire

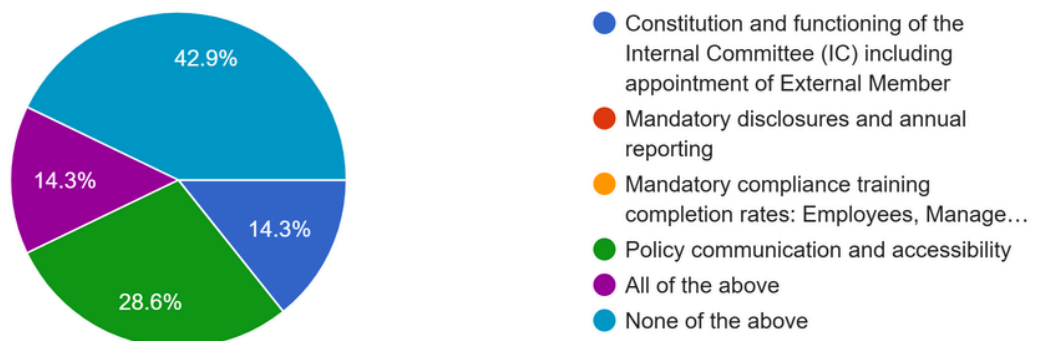
What is the single biggest PoSH-related challenge your organisation is facing in 2026?

7 responses



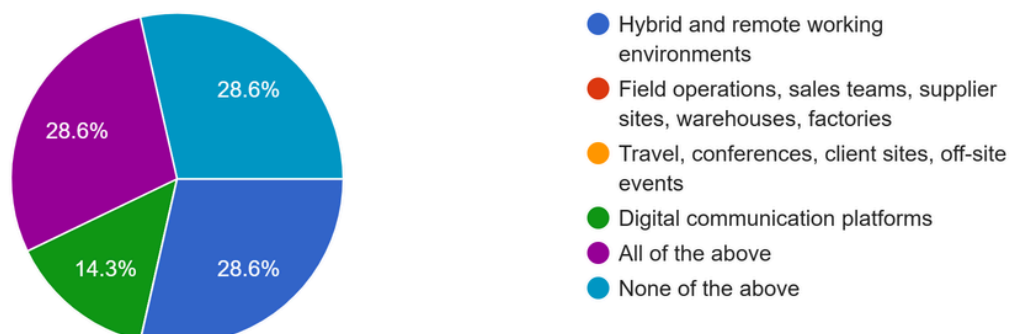
Are you legally compliant, or are you demonstrably effective? Roadmap question: Which compliance gaps identified in Q1–Q2 require immediate remediation before year-end?

7 responses



Have you updated risk register/ SOP/ policy to reflect new workplace realities and emerging risks? Roadmap Question: What are the emerging...lace sexual harassment risks in our organisation?

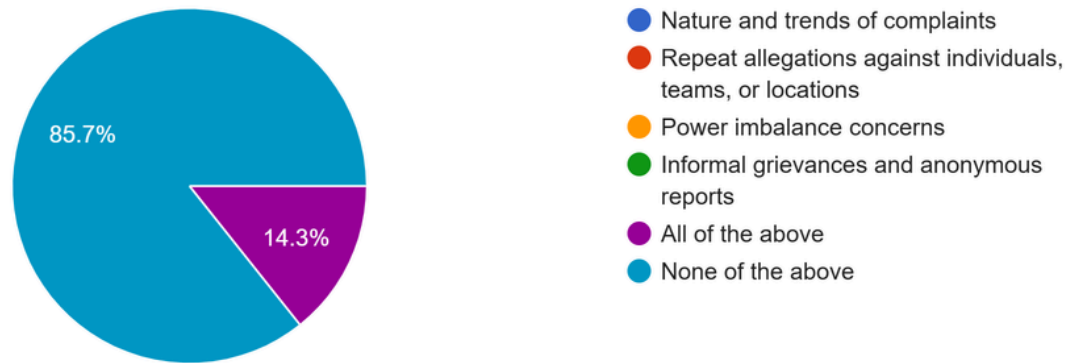
7 responses



Annexure 4: Results from Self-assessment Questionnaire

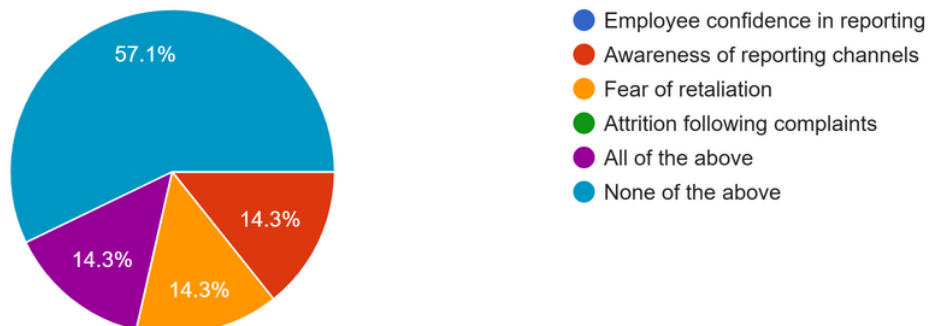
Are complaints, concerns, and informal reports revealing systemic issues? Roadmap Question: What root causes are emerging that require organisational intervention rather than case-by-case responses?

7 responses



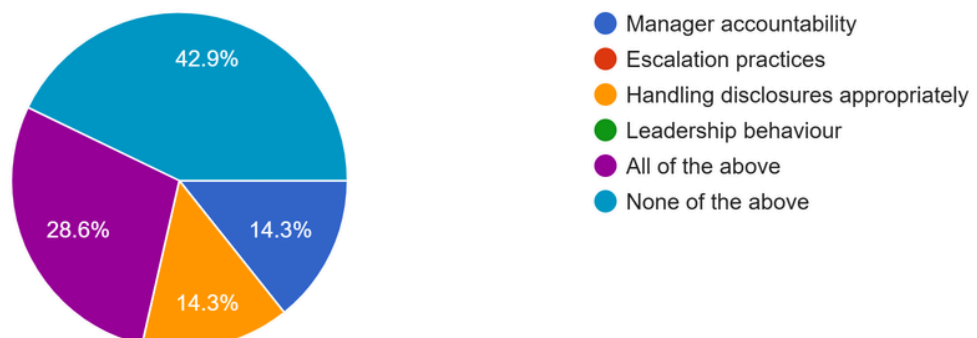
How effective is your reporting and speak-up culture? Roadmap Question: What barriers prevent employees, interns, consultants, contract workers, and gig workers from speaking up?

7 responses



Are managers equipped to act as the first line of prevention? Roadmap Question: Which management levels require targeted capability building in the next six months?

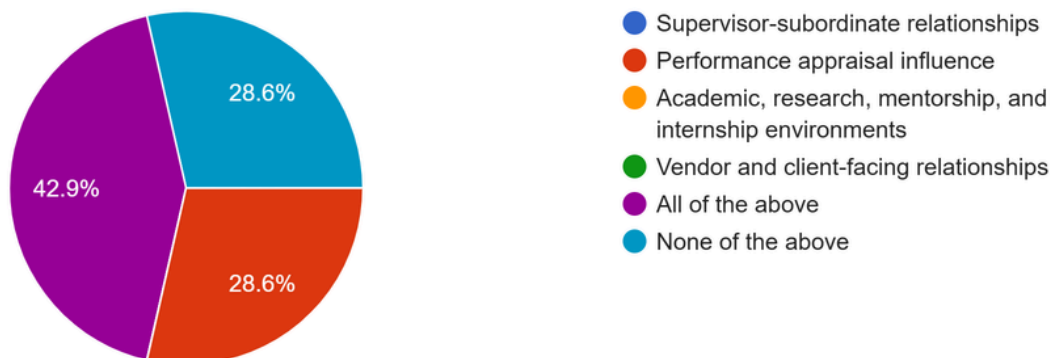
7 responses



Annexure 4: Results from Self-assessment Questionnaire

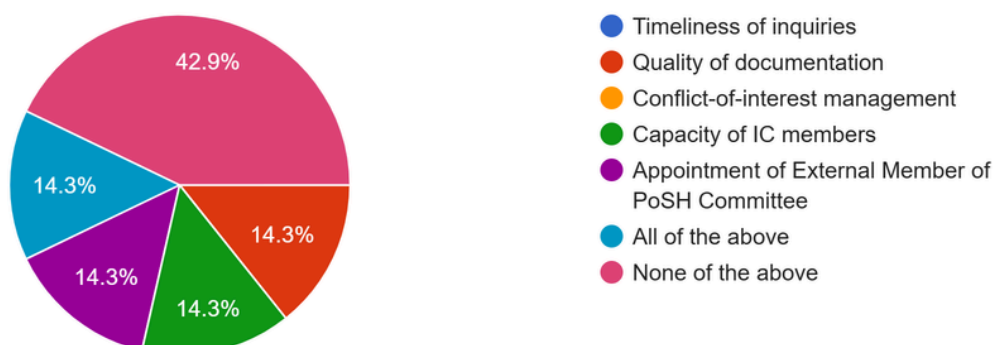
Are you adequately addressing risks arising from power dynamics? Roadmap Question: What safeguards are required to address abuse of authority, coercion, and perceived consent issues?

7 responses



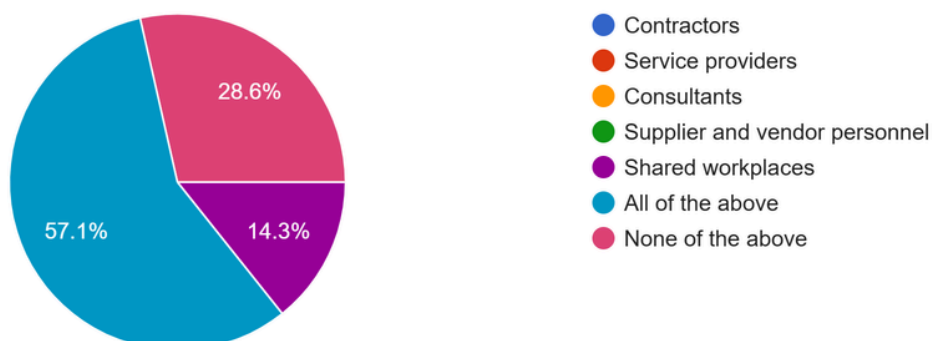
Is the Internal Committee functioning as an independent and trusted governance mechanism? Roadmap Question: Does the IC require...informed, or investigation training? Which areas?

7 responses



Are third-party and supply-chain workplace risks being adequately governed? Who are they? Roadmap Question: How are PoSH obligations...nd audits? Which of the following need a review?

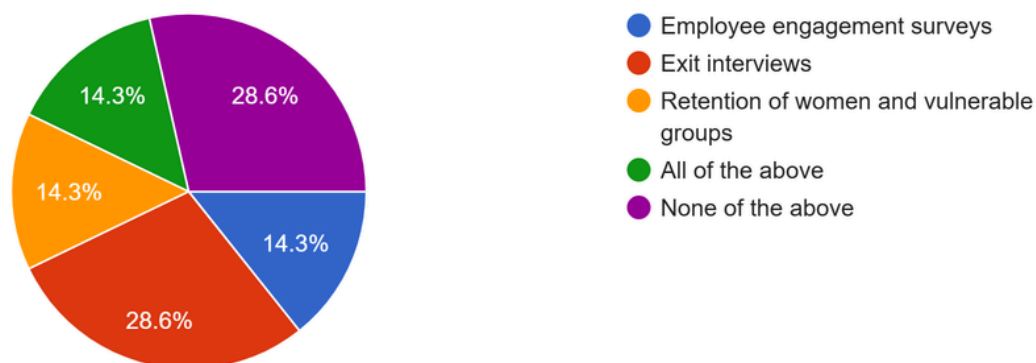
7 responses



Annexure 4: Results from Self-assessment Questionnaire

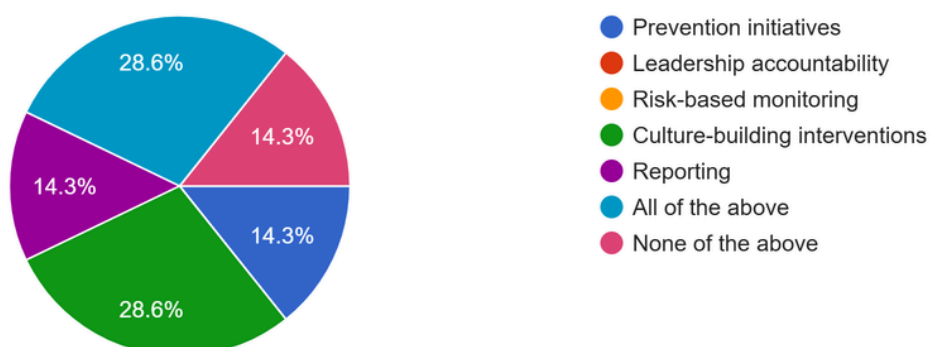
What do our workplace culture indicators tell us? Roadmap Question: Which organisational behaviours, practices, or leadership actions are undermining workplace safety?

7 responses



What should our PoSH Risk Governance Roadmap look like for the next six months? Roadmap Question: What is the top most strategic priority to...en workplace safety and reduce organisational risk?

7 responses



Which area requires the greatest attention in your organisation during the next six months?

7 responses



Annexure 5: Anonymous Participant Reflections

Some of the key reflections emerging during the consultation were as follows:



Employees need to be made fully aware of their rights and obligations under the PoSH Act. Issues such as confidentiality, non-retaliation / victimisation and handling of grievances leave a lasting impact on the employees participating in a process and shape the environment of the organisation.



The involvement of leaders in PoSH implementation is one of the surest indicators of success.



Harassment (including sexual harassment) and bullying are more often than not a trickle-down issue, managers / supervisors need to be equally made aware of their role in maintaining a harassment free environment.



Anonymous complaints point to some deeper issues in relation to the trust in the organisation or its psychological safety.



Internal committees hold a powerful position, i.e., quasi-judicial authority in the organisation, and need continuous practical training and exposure to various workplace situations in order to ensure appropriate handling of cases as per principles of natural justice. Most importantly, definitions of 'sexual harassment' and 'workplace' are ever-evolving concepts and the IC needs to be kept abreast of such developments in order to not dismiss an issue which falls under their jurisdiction.



Frequent organisational reviews coupled with data-based assessments allow for discovering systemic issues before they become more serious and lead to any formal disagreements.

Annexure 6: Glimpse from the Workshop



IX. CONCLUDING NOTE

Q2 and Q3 of the financial year are important times for organisations to evaluate initiatives, assess progress, and course-correct where necessary. Mid-year review offered an opportunity not only to check compliance status but also to reflect on organisational practices, strengthen institutional mechanisms, and align workplace conduct with evolving expectations of responsible governance.

This Mid-Year PoSH Review is a Strategic Annual initiative by P/ PRABHAVEE. The objective is to encourage organisations to move beyond compliance and strategise in building safer, more accountable, and resilient workplaces.

We thank everyone who has participated in the survey, joined the consultation, and contributed to the discussions. We look forward to hosting this consultation again next year.

X. ABOUT THE GUEST SPEAKER

Advocate Suruchi Kumar is an Independent Practitioner and the Principal Attorney of Law Chambers of Suruchi Kumar (SKLC). She was formerly designated as Partner – Employment, Labour and Benefits Laws practice at the top-tier law firm, Shardul Amarchand Mangaldas & Co.

She is an Advocate enrolled with the Bar Council of Maharashtra & Goa and has over 15 years of experience specialising in Indian employment and labour laws with a focus on employee relations, internal investigations, disciplinary actions, compliance with the Prevention of sexual harassment and inclusion & diversity laws (such as laws dealing with rights of persons with disabilities and transgenders) at the workplace.

XI. ABOUT THE ORGANISER

Anumita Sarkar is an Independent Policy and Strategic Advisor and **Founder of P/ PRABHAVEE**, a Delhi-based strategy consulting practice working at the intersection of policy, law, and business strategy. She specialises in social sustainability, labour rights, governance, ethics and compliance, business integrity, corporate accountability, human rights, and responsible business. Through strategic advisory, multi-stakeholder consultations, training and capacity-building, and other strategic engagements and programmes, she advises organisations on embedding responsible business practices and strengthening governance frameworks.

A strategic leader with an interdisciplinary academic background in Sociology, Law, Communications, and Strategic Management, Anumita brings close to 20 years of cross-sectoral, cross-functional, and multi-stakeholder experience. Her work spans regulatory risk consulting, legal and compliance, public policy, social impact, academia, and responsible business, with expertise in translating complex regulatory and governance challenges into practical organisational strategies. She has worked across diverse sectors, including legal technology (GRC), publishing and information services, consulting, higher education, public policy, social enterprise, nonprofit accelerator, and advisory boards. Throughout her career, she has collaborated extensively with government institutions, the private sector, nonprofits, industry associations, business chambers, academia, think tanks, and C-suite leaders. Prior to her work in Consulting, Anumita spent over 11 years in tax practice, legal technology, publishing, and information services, building a strong foundation in governance, risk management, and business operations.

Anumita started her career as a litigator specialising in tax matters and spent 5 years in litigation. She appeared before quasi-judicial authorities, Tax Tribunals in Delhi and Kolkata, represented before government authorities and various forums, and has independently handled matters, achieving several favourable judgments. She later moved on to work for a legal technology company. Anumita has spent approximately 7 years in the legal technology and information services sector, with expertise spanning regulatory compliance, governance, risk, and compliance solutions, and product management, working on digital software and knowledge-based products.

Anumita is recognised for building strategic partnerships and designing high-impact capacity-building programmes. She delivers lectures and professional training on sustainability and the social dimensions of ESG and responsible business. She advises organisations on multi-stakeholder initiatives, facilitates strategic consultations, develops knowledge partnerships, and designs learning programmes that strengthen governance and organisational capability. Anumita is a Prevention of Sexual Harassment of Women at the Workplace (PoSH) advisor registered with the Ministry of Women & Child Development, Government of India. She serves as an External Member of PoSH Internal Committees and is an Advisory Board Member of a grassroots non-governmental organisation.

She is a strategic partner to Higher Educational Institutions, Universities, Academic Research Centres, Think Tanks, Policy Research and Advocacy Organisations. She currently collaborates with the Centre for Business and Human Rights (CBHR) at Tamil Nadu National Law University.

Anumita is an alumna of Miranda House College and Campus Law Centre, Faculty of Law, University of Delhi, Cohort 5 alumna of the Women on Boards Programme at the Indian School of Development Management (ISDM), and an alumni member of the International Training Centre of the ILO (ITCILO).

XII. SPEAKERS

The Speakers

Safe Workplaces by Design: A Leadership
Imperative in Risk Governance:

A Mid-Year PoSH Review Consultation & Training

P/ PRABHAVEE

Partner for Social Impact

Strategic Review &
Capability Building
Intervention



ADVOCATE SURUCHI KUMAR

Law Chambers of Suruchi Kumar
Employment & Labour Laws
PoSH | D&I

GUEST SPEAKER



ANUMITA SARKAR

Founder, P/ PRABHAVEE
Human Rights & Responsible
Business

FACILITATOR & TRAINER

REGISTER

17 JULY 2026 | 2:00 PM TO 5:00 PM (IST) | ONLINE



Strategic Review & Capability-building Intervention

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

LEARNING OBJECTIVES

- 01** Mid-Year compliance review
- 02** Legal understanding
- 03** IC capability strengthening
- 04** Handle cases with confidence
- 05** Risk and Governance Lens

"Because safe workplaces are not created by policy alone, they are designed through leadership, systems, and accountability"

ABOUT THE WORKSHOP

A high-impact consultation-style workshop - mid-year PoSH review - designed to move beyond awareness-led training toward capability building, risk identification, and decision-making excellence.

KEY OUTCOMES

- Assess organisational readiness for a mid-year PoSH implementation
- Conduct fair and legally compliant inquiries
- Devise a clear action roadmap for the next 90 days

Safe Workplaces by Design: A Leadership Imperative in Risk Governance

