Reining in sexual harassment at the workplace in India

A survey by Fraud Investigation & Dispute Services
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Foreword

Corporate India has a diverse workforce. Over the years, companies have been focusing on driving gender diversity and inclusivity at the workplace. Their aim is to create a comfortable environment that encourages growth and development. Indian companies have now laid the foundation by taking the first steps in moving toward a harassment-free workplace.

Working in an environment that is hazard free is not a choice – it is the right of all employees. Today, with more and more women joining the workforce, companies need to ensure that their establishments are safe so that their women employees feel secure and can work at ease. One of the greatest threats to impair this feeling of security is sexual harassment at the workplace. The challenges associated with this practice are immense and can have adverse ramifications if they are not handled carefully.

The movement against sexual harassment in general and protection of women has been growing. In many cases, unfortunate incidents, media reports and people’s heightened awareness have brought to the fore the dark side of the corporate coin. This led to the enactment of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act 2013. The Government’s intent is to put a brake on such cases. However, recent data generated by the Government indicates that there has been a rise in sexual harassment and the number of complaints relating to it at the workplace has seen an upsurge.

Ignorance is no longer bliss, and with time, companies need to understand that they cannot turn a blind eye to harassment at the workplace. Such issues are widespread across different levels, sectors and industries, and need to be dealt with skill, maturity and compassion.

These factors steered EY to conduct a survey and understand corporate India’s readiness to manage sexual harassment at the workplace. The report will also help you understand the level of compliance required with the law, actual management of complaints and measures undertaken to ensure women’s safety in organizations.

Arpinder Singh
Partner and National Leader
Fraud Investigation & Dispute Services
Executive summary

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (hereafter referred to as the Act) was notified by the Indian Parliament in December 2013. It is modeled on the Vishakha guidelines which have served as the case law to curb instances of sexual harassment at the workplace since 1997. The main objective of the Act is to ensure that women feel safe at the workplace and to nurture the growth of a holistic work ecosystem.

In this report, EY’s Fraud Investigation & Dispute Services team throws light on the current state of implementation of the Act to prevent sexual harassment at the workplace. The objective is to understand corporate India’s compliance with the Act, steps undertaken to constitute Internal Complaints Committees (ICCs) mandated in the Act and to ascertain whether employers and employees have grasped its essence.

Growing consciousness of issues relating to women’s safety has compelled leading organizations to take cognizance of the Act and is motivating them to take the requisite steps mandated by it. Many of these do seem to recognize the need for it in spirit. But most companies have taken the initial steps to comply with the law by forming ICCs and are conducting relevant training for their members. There are certain requirements mandated under the Act that require stringent compliance, e.g., highlighting the penal consequences of sexual harassment. According to the survey, almost half of the respondents’ organizations had not displayed this clearly at prominent places within their premises. The survey also revealed that around 31% of the respondents were not compliant with the Act (after its enactment), which mandates ICCs being constituted to address complaints relating to sexual harassment. However, enforcement is still low due to organizations’ nonchalant approach toward the issue.

A detailed skill-building program is required to equip ICC members to understand organizations and the responsibilities of the ICC to handle such issues more effectively. In addition, the Act mandates awareness programs to sensitize employees.

According to our survey, 40% of the respondents are yet to train their ICC members, although the Act specifically mandates this.

Dealing cautiously with malicious complaints

Recent statistics released by the National Commission of Women (NCW) suggest that complaints regarding sexual harassment at the workplace are rising every year. This may however also indicate a rise in malicious complaints. One of the key challenges in such cases is ascertaining whether complaints made are malicious or frivolous. This is primarily because a complaint can only be considered malicious if the intent is proven. This involves a host of complexities, and is therefore difficult to substantiate without thorough investigation and assessment.

12% of the respondents stated that malicious complaints increase after appraisals and half of the respondents were unclear about malicious complaints received after assessment of the performance of employees.

Low awareness among employees

The efficacy of an anti-sexual harassment program depends greatly on awareness levels among a company’s employees. It is important for organizations to educate their employees on proper conduct at the workplace, list the do’s and don’ts with respect to the behaviour expected of them, conduct regular training and delineate the severe repercussions of violating the norms laid down. Women employees should know their rights and have the confidence to raise red flags, if required. At the end, it is the employer’s responsibility to ensure that women feel safe to report any complaints without fear of victimization.

44% of the respondents’ organizations did not display the penal consequences of sexual harassments at conspicuous places.
Consequences of non-compliance — penalties

Under the provisions of the Act, establishments face a penalty of INR 50,000 for their first violation and double the sum for subsequent ones. Repeated violations can lead to cancellation of their business license. Therefore, they need to tighten their internal processes to respond to complaints and take the requisite steps (as laid down by the Act) to appropriately respond to such cases. In addition to the financial loss suffered by an organization on being levied a penalty, a mishandled case can also lead to loss of reputation.

35% of the respondents were unaware of the penal clause for non-compliance with laws relating to how ICCs should be constituted

A relevant case

An Indian Court gave a verdict on a case relating to sexual harassment at the workplace recently where the employee was working at a leading company. The Court observed in its judgement that the company had failed to constitute an appropriate committee to deal with complaints relating to sexual harassment. The victim claimed damages to the tune of millions against the the company for failing to constitute an ICC.

Source: Factiva
Taking a serious approach to tackle sexual harassment at the workplace

The concept of sexual harassment at the workplace seems to be emerging from the dark shadows of corporate confines. Global news headlines have been highlighting a number of cases, spotlighting senior executives and leading corporations. The question is, what are companies doing to manage this evil? EY’s survey paints a rather sombre picture of the state of affairs when it comes to organizations curbing and managing sexual harassment at the workplace.

Accordingly to the survey, many organizations have seemingly put the basics of anti-sexual harassment mechanisms and campaigns in place in their operations. The survey revealed that round 69% of the respondents had constituted ICCs in their organizations after the enactment of the Act. However, 18% had not done so, despite their being a lapse of over a year from notification of the Act; 13% were still in the process of setting them up. Non-compliance among Indian companies was higher compared to the average - 36% had not constituted ICCs or were in the process. MNCs were marginally better, standing at 25%.

The results of the survey indicated that over a quarter (27%) of the large companies and half the small and medium companies that were surveyed were not compliant with the Act. This clearly shows their indifferent attitude to addressing this issue.

The formation of an ICC is fundamental to the Act and is mandatory for any establishment with more than 10 employees. This means that it applies to a large number of organizations in India, and there is very little they can do to escape their responsibility.

On the positive side, an overwhelming majority (98%) of the respondents indicated that their organizations would provide assistance to women if they choose to file complaints. However, there is a Catch-22 situation here. While companies may be willing to support the aggrieved women employees, how will they ensure that these women will feel confident enough to approach them if they do not have mechanisms to address these issues in the first place?
Case study 1

The HR department of a company hired a manager for its existing team. He was put in charge of a three-member team. Soon after, he began behaving inappropriately with one of his women reportees. He would repeatedly give her work late in the day and ask her to stay back after office hours to complete it. During this time, his conversation would relate to personal matters and would be laced with innuendos.

She reported this to the Director, but he dismissed her complaint. Moreover, the company did not have an ICC. Finally she decided to put in her papers and reported the matter to the local police station. This had an adverse effect on the company’s reputation.

According to the data compiled by the National Commission for Women (NCW), there is a noticeable rise in sexual harassment at the workplace.

Source: Factiva

- 2014: 336
- 2013: 249
- 2012: 167
- 2011: 170

**What does sexual harassment mean?**

“Sexual harassment” includes unwelcome acts or behavior (whether directly or by implication) such as physical contact and advance, a demand or request for sexual favors, making sexually colored remarks, showing pornography etc.

**50%**

automobile companies

**40%**

Information Technology (IT) companies

did not have an ICC constituted after the enactment of the Act
Unravelling the implications of the Act

The need and intent behind the Act is fairly simple — creating a working environment that is favorable for women employed in India. However, many companies struggle to interpret the Act and are unsure about the provisions that should be implemented in “spirit.” They need to realize their responsibilities as employers and the extent to which the Act applies to them.

According to our survey, 60% of the companies agreed to hold the mandatory training required for ICC members. This implies that almost 40% did not do so earlier or are probably in the stage of giving the training now. This issue is more pronounced among small and medium companies. According to 63% of the respondents, their companies had not conducted the ICC training mandated under the Act.

Compared to the overall numbers, Indian companies fared low with 47% of the respondents saying that their ICC members were not trained. On the other hand, MNCs stood at 34%.

This poses a huge problem, since companies will have to struggle to handle sensitive cases without adequate training and awareness of the issues involved. Since ICCs have the authority to handle such cases internally, organizations would not want to report them to law enforcement agencies to protect their public image.

To mitigate such risks, ICCs may take advantage of the reconciliation provisions in the Act before initiating inquiries at the request of aggrieved women employees and take effective steps to settle the matter between them and their employers.

Companies also need to know that there is a dire need for members to receive practical and realistic training through a hands-on approach so that they can conduct inquiries in a fair and just manner in the spirit the law requires. This can be fairly exhaustive in nature, from understanding how to accept and respond to a complaint to interviewing witnesses and gathering forensic evidence. A key insight derived from the survey was that many of the respondents were unaware of the duration of the training to be conducted for an ICC.

The survey also highlighted the fact that 34% of the respondents were unaware of the need for them to file annual reports for each calendar year, as mandated by the Act. The number was higher among respondents from Indian companies wherein 40% were uninformed. According to recent news reports, the Government has asked private companies to submit monthly status reports on sexual harassment cases, if any, in their organizations. This means that companies will need to comply with these provisions or suffer the consequences of non-compliance.
Impact of the Act on employers

<table>
<thead>
<tr>
<th>Who does the Act apply to?</th>
<th>Applies to an “aggrieved woman,” which is a woman, of any age and whether employed or not, who alleges to have been subjected to any act of sexual harassment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who is responsible for implementing the provisions of the Act?</td>
<td>Employer’s responsibility ▶ Provide a safe working environment ▶ Constitute the ICC ▶ Display the penal consequences of sexual harassment at a conspicuous place in the workplace ▶ Organise skill building programmes for the members of the ICC ▶ Organise awareness programmes for employees</td>
</tr>
<tr>
<td>Where is it applicable?</td>
<td>At the “workplace,” which includes “any place visited by the employee, arising out of or during the course of employment, including transportation provided by the employer”</td>
</tr>
</tbody>
</table>

60% automobile companies had not conducted trainings for ICC members after constitution of the committee

50% advertising and media companies

50% pharmaceutical/ healthcare companies

50% electronics and telecom companies

50% were not aware that the ICC needs to file an Annual Report pertaining to each calendar year
Competency in handling of complaints

While addressing concerns about malicious complaints, ICCs are often challenged when they find out the truth. Keeping different scenarios in mind, it is necessary to maintain a certain level of balance when dealing with the sensitivities of people. The committee members involved in handling complaints need to be well trained to maintain an unbiased stance and ensure that the response to an aggrieved woman employee’s complaint is empathetic. However, they should not commit themselves to any serious action till it is determined whether the complaint is actually malicious.

Preparedness for ICC

Analyzing different points of view and taking into account all forms of evidence available is important before deciding whether a complaint is malicious or genuine. This evidence could include looking at emails, chat transcripts, CCTV footage, SMS messages, access logs and computer records, since some of these may give valuable insights in making a crucial decision. An allegation should only be considered malicious when the complainant has made the complaint knowing it to be false or the complainant or witnesses have produced a forged or misleading document. Therefore, mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

The appointment of a third party investigative agency, working under the directions of the ICC, is effective, since such agencies give a factual and neutral perspective to a case. Most of the respondents indicated that their companies did not deploy the services of third-party investigative agencies for cases relating to complaints of sexual harassment. Given the high risk and sensitivities involved in some of such cases, using third party specialists could be beneficial in uncovering relevant facts under the directions of ICCs.
Questions to be asked or raised by the management/ICC:

- Is it necessary to constitute an ICC at every office?
- Can the presiding officer of an ICC be same across locations?
- What should be done if a woman employee does not report an incident to the ICC?
- You already have a gender-neutral policy. Do you need to specifically draft a new policy for women employees?
- Who is defined as an “employer”? Is it the CEO or the Board of Directors?
- If you already have a whistle-blowing hotline, does an employee still need to approach your ICC?
- What are the considerations for deducting “compensation” in your organization?
- If a contract employee working in your organization alleges sexual harassment, is that your responsibility?
- Is it your responsibility to address the issue of sexual harassment of a woman in the workplace even if she is not an employee?
- Do you need to revise your company’s policy, if it has been already constituted, based on the Vishaka Committee’s guidelines?

Case study 2

A young IT professional was often teased by her fellow colleagues because of her conservative way of thinking. She felt uncomfortable when her male colleagues would try to be friendly with her and exchange inappropriate jokes and remarks in person or through emails and SMS.

She was distressed since this began affecting her work. Finally, she approached her company’s ICC and filed a complaint of sexual harassment. On investigation, it was discovered that there was no malicious intent and her colleagues were only being friendly with her.

In such cases, it is crucial that the ICC provides feedback to the aggrieved woman employee that there is no malicious intent in her colleagues’ actions. The committee members should also communicate to her the details of the company’s internal policy on these matters, and if needed, provide the option for settlement.

50% electronics and telecom companies

said that malicious complaints related to sexual harassment increase post appraisals or performance assessments
Dealing with the human element and sensitivities: Complainants are not in a state of mind to narrate incidents coherently in many cases. This may be due to their feeling of insecurity in general, shock or lack of confidence in an ICC. The real challenge is to earn employees’ trust and handle such situations tactfully. This will help elicit desired information that can facilitate the inquiry and lead to a logical conclusion. This also applies to drawing out relevant information from the respondent.

Maintaining confidentiality: Stakeholders such as the complainant, respondent, witnesses and the management play a critical role during the inquiry process. Any leaks in the chain of confidentiality could tarnish the reputation of individuals as well as the company. This requires intelligent handling, since the provisions in the Act prescribe penalties if the details of a complainant, respondent or witness are disclosed publically.

Verification of facts: The challenge encountered here is to authenticate facts if the harassment has occurred in isolated areas or without any witnesses.

Uncovering tangible evidence: The Act vests the powers of a civil court to an ICC, under which, the latter can summon and enforce the attendance of individuals and examine them under oath. They can also demand discovery and production of documents. However, this may be difficult to execute because ICCs may lack expertise in this area and may not be equipped to conduct methodological investigation to arrive at a logical conclusion.

Presenting unbiased results: A four-member ICC will have three members who are members of the organization. Since they may know the complainant, there could be allegations of bias by either party.

Maintaining chain of custody: Every piece of evidence discovered or collected in general and forensic evidence found during the investigation need to be kept under the ambit of the proper chain of custody since it needs to be scrutinized by the ICC, law enforcement agency or court of law. There is a possibility that the aggrieved party may challenge an inappropriate chain of custody.

EY’s viewpoint

Challenges in a sexual harassment investigation
There are dire consequences in store for companies that do not comply with the Act or contravene any of its provisions. In addition, non-compliance with its rules can put a company’s reputation at stake and may cause significant loss in its productivity as well.

Among the respondents, 35% were unaware of the penal consequences for non-compliance, when constituting ICCs. The issue was more pronounced among MNCs with almost 38% stating their ignorance. This indicates that they do not comprehend the losses possible through their obliviousness.

Apathy was rampant among small and medium-sized companies, with 38% of the respondents being unaware of the repercussions of their non-compliance.

The Government is ramping up action against non-compliant companies and they need to understand the severe consequences they could be presented with.
Case study 3

A junior team member approached her senior and indicated that another senior employee from a different division had tried to hold her hand and invited her for dinner. She was uncomfortable, but since this incident happened outside office, she did not have any witnesses or proof. While she was still unsure, she went ahead and flagged the issue. The matter was taken up by the company’s ICC.

After a thorough investigation, it was ascertained that the junior team member had raised a malicious complaint. This was because she wanted to change her profile and had approached the senior employee from the other division to help her out. However, he had refused and told her to take it up through the right channels. Upset by his response, she had filed the complaint. She was later dismissed from the company.

40% IT companies
40% advertising and media companies
67% electronics and telecom companies
59% banking and financial services companies

did not display at conspicuous places, the penal consequences of sexual harassment

were not aware of the penal clause for non-compliance of constituting an ICC
Corporate workplaces have become increasingly informal over time and it is not uncommon for employees to socialize beyond work hours. Teams may gather for various recreational activities after work or sometimes even on weekends; offsites are routine. Global points of presence also lead to have employees traveling for meetings, events and conferences. In such scenarios, how can employers ensure that individuals maintain proper decorum around their co-workers? A stray remark here, a colourful comment there – and the aftermath could result in a volatile situation.

The importance of training and awareness is crucial. Our survey revealed that 21% of the respondents’ organizations did not have general awareness campaigns aimed at their employees. According to 44%, their organizations did not display the penal consequences of sexual harassments at prominent locations. Indian companies ranked low, standing at 50% as compared to MNCs which stood at 40%.

Small and medium companies too fared low with 71% of the respondents indicating that their organizations did not display such warnings clearly.

One of the issues in such scenarios is inadequate training for employees, especially new joiners. With new recruitments, it is important to drive a company’s stance on such matters so that they can understand early its core values. Not surprisingly, 46% of companies do not have online modules for training new employees. The situation is worse in small and medium companies where 71% do not have such modules.

Low awareness among employees – a cause for concern
Further analysis revealed the nature and reasons for complaints received. These included:

<table>
<thead>
<tr>
<th>Reason</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical contact and advances</td>
<td>47%</td>
</tr>
<tr>
<td>Demand or request for sexual favors</td>
<td>13%</td>
</tr>
<tr>
<td>Sexually colored remarks</td>
<td>37%</td>
</tr>
<tr>
<td>Display of pornographic content</td>
<td>4%</td>
</tr>
</tbody>
</table>

Close scrutiny indicates that physical contact and advances were the primary reason, followed by sexually colored remarks. This makes it clear that comparatively easy-going work environments could result in employees behaving casually, with the possibility that this could be perceived as provocative.

40% of advertising and media companies did not have general awareness campaigns in their organizations, targeted at senior management to all employees.
The global viewpoint

### Snapshot of global laws around sexual harassment at the workplace

<table>
<thead>
<tr>
<th>S. No.</th>
<th>Key Criteria</th>
<th>US</th>
<th>UK</th>
<th>Australia</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Genesis and definition of sexual harassment</td>
<td>In 1980, the Equal Employment Opportunity Commission produced a set of guidelines for defining and enforcing Title VII (in 1984 it was expanded to include educational institutions). The EEOC defines sexual harassment as: Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when: 1. Submission to such conduct was made either explicitly or implicitly a term or condition of an individual's employment 2. Submission to or rejection of such conduct by an individual was used as the basis for employment decisions affecting such individual, or 3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. If an employer treats someone less favourably because they have rejected, or submitted to, either form of harassment described above, this is also harassment.</td>
<td>It states that harassment occurs where there is unwanted conduct on the ground of a person's sex or unwanted conduct of a sexual nature and that conduct has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them. If an employer treats someone less favourably because they have rejected, or submitted to, either form of harassment described above, this is also harassment.</td>
<td>The Sex Discrimination Act 1984 defines sexual harassment as “… unwanted conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated.”</td>
</tr>
<tr>
<td>3</td>
<td>Is the employer responsible?</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>4</td>
<td>Liability for employers</td>
<td>Monetary</td>
<td>Monetary</td>
<td>The person who sexually harasses someone else is primarily responsible. But the company may be held vicariously liable for sexual harassment by the employees, agents and contractors, unless it can show the steps that it took to prevent it from occurring.</td>
</tr>
<tr>
<td>5</td>
<td>Penalties</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Most countries have promulgated legislations that hold employers vicariously liable for acts of harassment by their employees, vendors, clients, sub-contractors etc. or within their workplace</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Employers’ liability stems from the premise that it is up to them to prevent sexual harassment and they become liable in the event of no action being taken when a case of sexual harassment is brought to notice</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sources:
<table>
<thead>
<tr>
<th>Brazil</th>
<th>Singapore</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law No 10.224</td>
<td>Protection from Harassment Act 2014</td>
</tr>
<tr>
<td>In 2001, the Brazilian Government enacted a criminal law (Law No 10.224) defining sexual harassment as an embarrassing conduct performed by a worker in a superior hierarchical position against someone hierarchically inferior at work, in order to obtain advantages or sexual favours. The law made sexual harassment a crime with imprisonment from one up to two years. This legislation has set Brazil apart from most countries where harassment is dealt with under civil law.</td>
<td>Section 4</td>
</tr>
<tr>
<td></td>
<td>1. No person shall by any means –</td>
</tr>
<tr>
<td></td>
<td>a) use any threatening, abusive or insulting words or behaviour; or</td>
</tr>
<tr>
<td></td>
<td>b) make any threatening, abusive or insulting communication, which is heard, seen or otherwise perceived by any person (referred to for the purposes of this section as the victim) likely to be caused harassment, alarm or distress.</td>
</tr>
<tr>
<td></td>
<td>2. Any person who contravenes subsection (1) shall be guilty of an offence and, subject to section 8, shall be liable on conviction to a fine not exceeding $5,000</td>
</tr>
<tr>
<td></td>
<td>3. In any proceedings for an offence under subsection (2), it is a defence for the accused person to prove –</td>
</tr>
<tr>
<td></td>
<td>a) that he had no reason to believe that the words or behaviour used, or the communication made, by him would be heard, seen or otherwise perceived by the victim; or</td>
</tr>
<tr>
<td></td>
<td>b) that his conduct was reasonable</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Unclear</td>
<td>Monetary</td>
</tr>
</tbody>
</table>

- In the event the harassment charges are proved against a person (who was involved in the dealing of the company), employer as well as the employee (who committed the crime) can be criminally held liable by the Criminal Courts, on the basis of the complaint filed by the victim.
- The employer may also become liable under the penal code on the grounds of complicity in the offence of sexual harassment.

Sources:
Conclusion

It is not impossible for corporate India to provide a safe place of work for their women employees. With the Government supporting this agenda, they need to implement the following as a start:

- **Constitute ICCs:** "Every employer of a workplace shall, by order in writing, establish an ICC. The employer shall nominate members of ICC, which shall consist of – (a) Presiding Officer who shall be a woman employed at a senior level, (b) not less than two members from amongst employees preferably committed to the cause of women and (c) one member from amongst non-governmental organisations."

- **Formulate and widely disseminate an internal policy/charter/resolution/declaration for prohibition, prevention and redressal of sexual harassment at the workplace:** It is imperative to declare the names and contact details of members of an ICC.

- **Drive awareness through online and offline training:** Organizations need to do more than have a tick in the box approach to effectively implement anti-sexual harassment policies at the workplace. This can be done through training – online and offline – for existing employees and new joiners.

- **Organize and hold orientation programs and seminars, and conduct capacity- and skill building programs for ICC members.**

- **Investigate complaints and take strict action against the perpetrators in the prescribed timelines.**

- **Monitor timely submission of reports by ICC to the Government.**

- **Treat sexual harassment as a “misconduct” under service rules/processes.**

- **Initiate action for such misconduct.**
About the survey

The survey was conducted during the period January 2015 to April 2015 through an online questionnaire, which was hosted on EY’s website in India. Hard copies of the questionnaire were given to participants at various events organised by the firm. We received more than 120 responses from the survey.

The principal respondents were senior executives from business functions including internal audit, human resources, finance and the legal and compliance domains. They represented a mix of Indian enterprises with domestic operations as well as the Indian subsidiaries of MNCs. They operated in a wide range of industries including banking and finance, manufacturing, media and entertainment, IT/ITeS, pharmaceuticals, automotive etc.

In addition to the survey results, the report includes our viewpoint based on experience over a period of time.

Note: Some of the percentages in the charts total to more than 100%, since the respondents were allowed to make multiple selections. Not all the questions in the survey were answered by all the respondents. Therefore, all the percentage figures are derived from the total number of respondents who answered a particular question and not on the total number of overall respondents.
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- Third-party Due Diligence
- Whistle-blowing Services
- Supply Chain Compliance
- Forensic technology and discovery services
  - Computer forensics
  - Forensic Data Analytics
  - e-Discovery
  - Software License and Forensic Disputes Services
  - Cybercrime Investigation and Intelligence Services
Reining in sexual harassment at the workplace in India
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