

## PoSH and POCSO: Understanding the Boundary and the Intersection in Educational Institutions

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### Abstract

Schools, colleges, and universities have a unique status under the laws of India dealing with sexual safety. A school, college, or university is an institution which acts as an educational institute, a workplace, and also an institution which has a relationship of authority, trust, dependency, and vulnerability among its members. Thus, a sexual misconduct accusation in an educational institution can trigger various legal regimes on the basis of the age, gender, status, nature of the alleged misconduct, and the relationship of the parties involved. The two important pieces of legislation in this regard are PoSH Act, 2013 and POCSO Act, 2012. Although both acts deal with sexual misconduct, the scope, objectives, process, reporting obligations, and ramifications under the two Acts are inherently distinct. PoSH is a preventive and redressal legislation for the workplace which seeks to protect women from sexual harassment at their places of work, while POCSO is a gender-neutral criminal legislation that protects every child below the age of eighteen from certain sexual crimes. The difference becomes important when a child student makes allegations of sexual misconduct by the teacher or any other staff member, or sexual harassment of a female student. Analysis of the two statutes through doctrinal research of relevant regulations and judicial rulings from India will be carried out to explore the demarcation line as well as the point of convergence between the two. This study aims to prove that the formation of the Internal Committee or an institutional disciplinary body cannot replace statutory reporting under POCSO. Equally, child-protection mechanisms cannot displace independent workplace obligations under PoSH. The paper proposes an Integrated Institutional Safeguarding Model based on legal triage, mandatory reporting, competent statutory mechanisms, immediate protective measures, confidentiality, natural justice, professional-boundary regulation, capacity building, and periodic safeguarding audits.

**Keywords:** PoSH Act, POCSO Act, Educational Institutions, Sexual Harassment, Child Sexual Abuse, Internal Committee, Mandatory Reporting, Child Safeguarding, Institutional Accountability, Schools.

### Introduction

Educational institutions are not merely centres of academic instruction. They are complex institutional environments where children, adult students, teachers, administrators, contractual personnel, transport workers, coaches, counsellors, visiting faculty, interns, volunteers, and management interact within relationships involving varying degrees of authority and dependency.

For this reason, sexual misconduct in an educational institution cannot always be addressed through a single legal mechanism.

Two major statutes assume particular significance: the Protection of Children from Sexual Offences Act, 2012 (POCSO) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (PoSH).

The distinction between these statutes is sometimes blurred at the institutional level because both may involve behaviour described generally as "sexual harassment." Legally, however, their foundations are different.

POCSO defines a child as any person below eighteen years of age and creates gender-neutral criminal offences involving penetrative sexual assault, sexual assault, sexual harassment, and child sexual exploitation material, together with child-sensitive procedures and mandatory reporting obligations (Protection of Children from Sexual Offences Act, 2012, §§ 2(d), 3–12, 19–21).

The PoSH Act, conversely, addresses sexual harassment of an "aggrieved woman" in relation to a workplace. Importantly, the statutory definition of an aggrieved woman includes a woman of any age, whether employed or not, who alleges that she has been subjected to sexual harassment at a workplace (Sexual Harassment of Women at Workplace [Prevention, Prohibition and Redressal] Act, 2013, § 2(a)).

Educational institutions are explicitly covered by the statutory definition of workplace in Section 2(o).

This presents a particularly significant area of possible overlap: the girl-child within the educational institution is at once a child under POCSO and an aggrieved woman under PoSH. But it does not mean that the two statutory processes can be used interchangeably.

The research problem, therefore, is:

How do educational institutions delineate the PoSH-POCSO boundary while responding appropriately to the situation where the two meet?

The core research hypothesis posited in this paper is that the key question educational institutions should ask is not:

Is it a PoSH or POCSO issue? but,

What obligations are created by the particular facts of the case, and what processes need to run without either substituting for the other?"

### **Research Objectives and Methodology**

This paper adopts a doctrinal and analytical methodology based upon statutory interpretation, judicial decisions, subordinate legislation, regulatory materials, and relevant academic scholarship.

The objectives are:

- to distinguish the statutory scope of PoSH and POCSO;
- to identify circumstances in educational institutions where the two frameworks may intersect;
- to analyse important Indian judicial decisions concerning workplace sexual harassment, child sexual abuse, reporting, confidentiality, and procedural fairness;
- to identify implementation risks created by institutional misunderstanding; and
- to propose an integrated safeguarding framework for educational institutions.

Existing scholarship has recognised both the importance and implementation difficulties of POCSO. Belur and Singh (2015), for example, identify POCSO as a significant specialised legislative response to child sexual abuse while also examining practical complexities associated with its operation. More recent scholarship similarly emphasises the Act's gender-neutral protection, child-centred orientation, and continuing implementation challenges (Handa & Goswami, 2024).

### **Constitutional Foundation of Workplace Sexual-Harassment Protection**

The legal development of workplace sexual-harassment protection in India cannot be understood without *Vishaka v. State of Rajasthan* (1997).

In *Vishaka*, the Supreme Court connected workplace sexual harassment with women's constitutional rights under Articles 14, 15, 19(1)(g), and 21. In the absence of any special law passed by the parliament, it formulated guidelines which made it obligatory for institutions to put in place mechanisms for preventing and resolving issues related to sexual harassment.

What is even more important about *Vishaka* is not only the guidelines per se but also its transformation of the issue of workplace sexual harassment from that of an individual labor dispute to one of constitutional equality, dignity, and occupational freedom.

The above-mentioned jurisprudence was fortified further in *Apparel Export Promotion Council v. A.K. Chopra* (1999). The Supreme Court rejected an unduly restrictive view of sexual harassment and held that unwelcome conduct having sexual overtones need not necessarily involve physical assault. The importance of the above-mentioned case lies in the fact that workplace sexual harassment cannot be understood only in terms of physical assaults.

In *Medha Kotwal Lele v. Union of India* (2012), the Supreme Court had to face problems in implementation of Vishaka guidelines and stressed that there should be effective institutional mechanisms and not token ones.

### **PoSH in Educational Institutions**

The concept of "sexual harassment" is given in Section 2(n) of the PoSH Act by identifying specified forms of unwelcome sexually determined behavior.

The Prohibition of Sexual Harassment at Workplace is prohibited under the substantive provision given in Section 3.

Particularly significant for the education sector is the provision given in Section 2(o) as it defines workplace as including educational institutions.

Consequently, the workplace environment need not necessarily be limited to classroom or office premises. Depending upon the factual connection with work or institutional activity, the places can be:

- Classroom and laboratory;
- Faculty room and administrative office;
- Hostel and residential premises;
- Institutional transport;
- Sports facilities;
- Field trips and educational tours; and
- Conferences and training programs.

Section 4 lays down the establishment of an Internal Committee (IC) in the workplaces that satisfy the statutory criteria. The composition of the Internal Committee itself is a substantive safeguard.

It has been reaffirmed in *Punjab & Sind Bank v. Durgesh Kuwar* (2020). It stated the need for having an independent external member as per Section 4(2)(c). This is because independence would help in ensuring impartiality and objectivity in matters.

This aspect holds significant importance for the educational institutions. Just having an order regarding the constitution of the IC will not suffice. The committee should be properly constituted, independent, trained, approachable, and procedurally sound.

### **Aureliano Fernandes and Procedural Fairness in Universities**

The educational setting has been specifically taken into account in *Aureliano Fernandes v. State of Goa* (2023).

It has been held in this case with regard to the sexual harassment of a university employee wherein there were serious concerns about the procedure followed in the inquiry. There has been emphasis on the requirements of natural justice and procedural fairness in the Supreme Court and several directions have been laid down in relation to the implementation of the PoSH framework.

This particular judgment is especially important since it illustrates the fact that there are two distinct principles which must go hand in hand:

- Firstly, there must be a serious and effective handling of any allegations of sexual harassment.
- Secondly, seriousness of the allegation does not detract from procedural fairness.

An Internal Committee thus performs a delicate statutory duty. Its function is neither to mindlessly endorse every complaint nor to treat the complainant with suspicion. It needs to conduct an impartial process, not pre-judge the issue, ensure confidentiality, provide sufficient opportunity to the parties and arrive at reasoned conclusions.

Subsequently, Initiatives for Inclusion Foundation v.

### **POCSO: A Distinct Child-Protection Framework**

The POCSO Act has a different statutory basis.

Section 2(d) states that "child" means any person below eighteen years of age. In contrast to PoSH, there is no gender bias here.

POCSO Act criminalizes offences such as:

- Penetrative sexual assault (§§ 3–4)
- Aggravated penetrative sexual assault (§§ 5–6)
- Sexual assault (§§ 7–8)
- Aggravated sexual assault (§§ 9–10)
- Sexual harassment of a child (§§ 11–12) and

Use of children for pornographic/sexual exploitation offenses under the said sections.

This difference is important from the point of view of schools.

An alleged sexually assaulted 14-year-old boy who would not fall under the ambit of "aggrieved woman" under PoSH and be completely protected under POCSO.

Similarly, a 15-year-old girl sexually harassed would attract POCSO depending on her age and not depending upon the applicability of another institutional or workplace mechanism.

In Eera through Dr. Manjula Krippendorf v. State (NCT of Delhi) (2017), the Supreme Court has looked into Section 2(d) and clarified that "child" in POCSO is defined based on age below eighteen. It clearly indicates how age is an important aspect of POCSO.

### **Mandatory Reporting: The Critical Boundary**

Maybe the most important distinction between PoSH and POCSO is the mandatory reporting requirement.

Under Section 19(1) of POCSO, if a person believes that an offence under POCSO is likely to be committed or has knowledge of any such offence having been committed, he/she is required to disclose that information to the Special Juvenile Police Unit or the local police.

Section 21 provides for consequences if there is a failure on the part of anyone to make such disclosure of information.

It has very significant implications for educational institutions.

Where Section 19 applies, it is incorrect to consider it a matter where reporting can be deferred till a determination by the institution as to whether the information is "true".

The judgment of the Supreme Court in State of Maharashtra v. Dr. Maroti (2022) is particularly relevant in this context. The Court was dealing with allegations of non-reporting of sexual offences against minor girls in a hostel. The Supreme Court viewed POCSO as a statutory obligation and did not allow premature discontinuation of the prosecution.

The principle is important for principals, teachers, doctors, counsellors, hostel authorities and management in general.

### **Judicial Recognition of Institutional Responsibility Towards Children**

In Shankar Kisanrao Khade v. State of Maharashtra (2013), the Supreme Court discussed specifically the duties of those in charge of educational institutions, hostels, children's homes, and other such institutions when sexual abuse against children takes place.

The observations of the Supreme Court make clear that educational institutions that house or teach children cannot stand by if there is a case of sexual abuse against a child.

In Alakh Alok Srivastava v. Union of India (2018), the Supreme Court underlined the importance of the efficient functioning of POCSO law, including Special Courts and sensitization of judges hearing child-protection cases.

The decision further reinforces an important point: that child-friendly justice is not merely an idealistic notion. It is a part of the practical machinery of POCSO.

### Privacy, Confidentiality and Protection of Identity

Both POSH and POCSO ensure confidentiality, but the laws are different in some aspects.

Section 16 of POSH Act states that publication or communication of the contents of complaint and inquiry, names and addresses of the aggrieved woman, the accused and the witnesses, recommendation, and action taken shall be restricted according to the statutory provisions.

Apart from this, POCSO has added provisions regarding the identity of the child and the child-friendly process as per Section 23 dealing with media reporting.

The Supreme Court delivered certain guidelines in *Nipun Saxena v. Union of India* (2018) regarding the protection of identity of victims of sexual crimes, including those covered under POCSO. The Court clarified that identifying information goes beyond merely making public the name of the victim.

Institutions should therefore know the basic difference between the two:

- Confidentiality is not concealment.
- Confidentiality ensures the privacy of the affected individual through controlled disclosures.
- Concealment stops information which the law mandates to be disclosed.

The institution's worry over reputation, publicity, parent's response, staff morale, or litigation cannot outweigh the statutory duty of reporting.

### Sexual Intent and the Scope of POCSO

Another important case is that of *Attorney General for India v. Satish* (2021).

In this case, the Supreme Court did not accept the strict construction of "skin-to-skin" contact put forward by the Bombay High Court while interpreting the crime of sexual assault under POCSO. The court emphasised the relevance of sexual intent and gave a construction to the provision in line with the legislative intent of POCSO.

The importance of the case is also relevant from a practical perspective for educational institutions.

It is important not to give a false impression through staff training that child sexual abuse occurs only in cases where there is a certain form of direct physical contact.

### PoSH, POCSO and Their Intersection: Comparative Matrix

| Sr. No. | Parameter                    | PoSH Act, 2013                                                       | POCSO Act, 2012                                                                            | Area of Intersection in Educational Institutions                                   |
|---------|------------------------------|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| 1       | Primary objective            | Prevention, prohibition and redressal of workplace sexual harassment | Protection of children from specified sexual offences and child-sensitive criminal process | Both contribute to institutional sexual safety but through different mechanisms    |
| 2       | Protected person             | Aggrieved woman as defined in § 2(a)                                 | Any child below 18, irrespective of gender, § 2(d)                                         | A female child may potentially engage both statutory frameworks depending on facts |
| 3       | Core jurisdictional factor   | Sexual harassment connected with workplace                           | Age below 18 plus conduct constituting a POCSO offence                                     | Age must be established immediately when a student is involved                     |
| 4       | Nature of framework          | Workplace prevention and redressal                                   | Substantive criminal law and child-protection procedure                                    | Institutional and criminal processes may coexist                                   |
| 5       | Sexual harassment provisions | §§ 2(n), 3                                                           | §§ 11–12                                                                                   | Similar terminology does not create identical jurisdiction                         |
| 6       | Institutional mechanism      | Internal Committee under § 4 / Local Committee where applicable      | Police/SJPU, Special Court and statutory child-protection process                          | IC cannot substitute for POCSO authorities                                         |
| 7       | Reporting/co complaint       | Complaint mechanism primarily under § 9                              | Mandatory reporting under § 19                                                             | A POCSO disclosure must not be held back pending an IC inquiry                     |

|    |                         |                                                                                                                                         |                                                             |                                                                                  |
|----|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------------------------------|
| 8  | Failure to comply       | Employer may face consequences under § 26 and other applicable provisions                                                               | Failure to report/record may attract § 21                   | Management must understand which statutory obligation has been activated         |
| 9  | Confidentiality/privacy | § 16                                                                                                                                    | §§ 23, 24, 33, 37 and related safeguards                    | Information should be shared only where legally/operationally necessary          |
| 10 | Gender                  | Statutory complainant protection is woman-specific                                                                                      | Child protection is gender-neutral                          | Male child: POCSO may apply although PoSH protection as aggrieved woman does not |
| 11 | Age                     | Definition of aggrieved woman expressly uses "of any age"                                                                               | Strictly below 18                                           | Minor female complainants require particularly careful legal triage              |
| 12 | Outcome                 | Workplace findings, recommendations and employment/institutional consequences                                                           | Criminal investigation, prosecution and adjudication        | One proceeding should not be confused with or unlawfully replace another         |
| 13 | Educational application | Employees and, depending on statutory/regulatory context, women connected to workplace: UGC Regulations are especially relevant to HEIs | All children below 18 where statutory offence is implicated | Schools require both workplace-compliance and child-safeguarding architecture    |

#### Four Scenarios Demonstrating the Boundary

- **Scenario I: A 15-Year-Old Girl and a Teacher**

Consider the case in which a 15-year-old student alleges that a teacher repeatedly sends sexually explicit text messages to her and asks for her sexual photographs.

Age alone calls for POCSO considerations. The institution will have to consider the POCSO Act provisions and adhere to section 19 if necessary.

The institution should not start off with a lengthy disciplinary investigation and then take a call whether or not to alert the police.

Employment consequences of the teacher, if any, will have to be dealt with according to the service conditions and other requirements of law.

- **Scenario II: 21 Year Old University Student**

A 21 year old female university student claims sexually colored remarks, unwelcome advances, and threats to her academics.

POCSO is not applicable here since she is not a child.

However, PoSH and UGC (Prevention, Prohibition and Redressal of Sexual Harassment of Women Employees and Students in Higher Educational Institutions) Regulations, 2015 will be particularly relevant here.

- **Scenario III: 14 Year Old Male and Sports Coach**

A male student alleges sexually inappropriate touching at the hands of his sports coach.

The fact that the complainant is a male is immaterial when it comes to POCSO since the Act is gender neutral for the child.

This scenario illustrates why the sexual safety policy of a school cannot comprise only an Internal Committee setup under PoSH.

- **Scenario IV: Female Teacher and Principal**

A female teacher complains of persistent sexual harassment by the principal.

Provided that the statutory elements are satisfied, this will primarily fall under PoSH and hence the Internal Committee approach will be relevant here.

Since the complainant is an adult, POCSO has no applicability here.

### **The Danger of "Internal Inquiry First"**

Internal determination of the credibility of the child's allegation prior to any reporting is one of the gravest institutional mistakes.

The institution can think that way:

"Let us conduct our own inquiry. If we find the allegation to be true, we shall make a report."

This approach is legally risky when Section 19 POCSO becomes applicable.

The obligation to report and the criminal inquiry are totally different from the internal disciplinary process.

Moreover, a badly organized institutional inquiry may result in repetitive narration for the child who will have to retell his/her story to a class teacher, counsellor, coordinator, principal, management representative, disciplinary committee, parents, police, doctors and, finally, to the court.

So, an institution should try not to repeat unnecessarily and not involve safeguarding staff in amateur investigation of crime.

The goal of the first institutional reaction should be:

receive → protect → document properly → classify legally → report if necessary → maintain confidentiality → facilitate statutory procedure.

### **Natural Justice and Child-Centred Protection**

A sophisticated safeguarding framework must avoid two opposite errors.

The first is institutional disbelief, where the complainant or child is treated with suspicion, blamed, intimidated, or discouraged from reporting.

The second is procedural prejudgment, where the allegation itself is treated as a final determination of guilt.

Aureliano Fernandes demonstrates the importance of natural justice in workplace inquiries. POCSO simultaneously requires child-sensitive procedures and protection against secondary victimisation.

These principles are complementary rather than contradictory.

A child-sensitive or trauma-informed approach concerns how the affected person is treated.

Natural justice concerns how legal or institutional responsibility is determined.

An educational institution should be capable of doing both.

### **Integrated Institutional Safeguarding Model**

This paper proposes a seven-stage model.

- **Stage 1: Immediate Safety**

Determine whether the affected person requires urgent medical, psychological, physical, academic, or workplace protection.

- **Stage 2: Age-Based Legal Triage**

Where a student is involved, establish age immediately.

If the individual is below eighteen, assess POCSO implications.

- **Stage 3: Status and Conduct Mapping**

Identify:

age;

gender where relevant to the applicable statute;

student/employee/visitor status;

respondent's institutional relationship;

nature of alleged conduct;

location and digital/physical context; and

potential statutory provisions.

- **Stage 4: Mandatory Reporting**  
Where Section 19 POCSO is attracted, follow the statutory reporting mechanism.  
Do not postpone reporting merely to complete an internal investigation.
- **Stage 5: Parallel Institutional Obligations**  
Determine whether PoSH, UGC Regulations, service rules, disciplinary regulations, child-protection policy, or other legal duties independently apply.
- **Stage 6: Confidentiality and Anti-Retaliation**  
Protect the affected person and witnesses against:  
retaliation;  
academic disadvantage;  
intimidation;  
victimisation;  
unnecessary disclosure;  
social-media exposure; and  
repeated questioning.
- **Stage 7: Follow-up and Institutional Learning**  
After the immediate matter is addressed, review whether systemic failures contributed to the incident.  
The purpose should not be merely to close a case file but to prevent recurrence.

#### **Prevention: From Committee-Based Compliance to Whole-Institution Safeguarding**

A school cannot become child-safe simply by constituting a PoSH Internal Committee.

Similarly, a POCSO awareness poster cannot substitute for a functioning safeguarding architecture.

An effective educational institution requires differentiated training.

Teachers and faculty require training on professional boundaries, sexual harassment, child safeguarding, reporting responsibilities, digital communication, and retaliation.

Internal Committee members require specialised capacity building in complaint handling, evidence appreciation, natural justice, confidentiality, conflict of interest, reasoned findings, and jurisdiction.

School leadership must understand mandatory POCSO reporting and the limits of internal investigations.

Non-teaching and contractual personnel, including drivers, guards, housekeeping workers, coaches, and canteen personnel, require role-specific sensitisation.

Students need age-appropriate education concerning bodily autonomy, boundaries, unsafe behaviour, digital safety, trusted adults, and reporting mechanisms.

Parents should understand the institution's safeguarding system and reporting channels.

Such a model recognises that sexual safety is an institutional governance issue rather than the responsibility of a single committee.

#### **Digital Spaces: The Emerging Intersection**

Contemporary educational relationships extend well beyond campus boundaries.

- Teachers and students interact through:
- WhatsApp and other messaging services;
- learning-management systems;
- video-conferencing platforms;
- email;
- institutional applications; and
- social-media platforms.

This creates new safeguarding challenges.

Institutions should establish professional-boundary rules regarding private messaging, late-night communication, requests for photographs, disappearing-message platforms, personal social-media interaction, one-to-one online sessions, and transmission of inappropriate content.

The relevant question should not simply be "Did this happen inside school premises?"

It should be whether the conduct falls within the relevant statutory framework and whether the institutional relationship created or facilitated the interaction.

### Key Judicial Principles for Educational Institutions

The judicial authorities discussed in this paper may be synthesised as follows:

- **Vishaka v. State of Rajasthan (1997):** Workplace sexual harassment implicates constitutional equality and dignity.
- **Apparel Export Promotion Council v. A.K. Chopra (1999):** Sexual harassment should not be artificially confined to completed physical contact.
- **Medha Kotwal Lele v. Union of India (2012):** Institutional mechanisms must be effectively implemented rather than existing merely on paper.
- **Shankar Kisanrao Khade v. State of Maharashtra (2013):** Educational and child-care institutions bear serious responsibilities when sexual abuse of children comes to their knowledge.
- **Eera v. State (NCT of Delhi) (2017):** POCSO's definition of child turns on age below eighteen.
- **Alakh Alok Srivastava v. Union of India (2018):** Effective POCSO implementation and child-sensitive justice require institutional and judicial capacity.
- **Nipun Saxena v. Union of India (2018):** Identity and privacy of sexual-offence victims, particularly children, require stringent protection.
- **Punjab and Sind Bank v. Durgesh Kuwar (2020):** Independence and lawful composition of the Internal Committee are substantive safeguards against institutional bias.
- **Attorney General for India v. Satish (2021):** POCSO's safeguards are not to be arbitrarily restricted with the "skin-to-skin" concept since sexual intention is important in the context of this statute.
- **State of Maharashtra v. Dr. Maroti (2022):** Failing to provide information about POCSO offences is a grave statutory matter that cannot be easily nullified.
- **Aureliano Fernandes v. State of Goa (2023):** Cases related to sexual harassment require actual compliance with the procedure.
- **Initiatives for Inclusion Foundation v. Union of India (2023):** Application of PoSH requires actual statutory authorities and monitoring rather than the mere existence of the legislation.

### Recommendations

Following changes are recommended for educational institutions:

- Separate but coordinated PoSH and POCSO/ child safeguarding protocols should be maintained.
- One page legal triage matrix with respect to age, status, nature of act, reporting duty, and competent authority needs to be made.
- Training for everybody who would have to handle child's disclosure of any abuse according to Section 19 of POCSO Act needs to be conducted.
- IC capacity building needs to be done periodically and not just sensitization.
- Development of professional boundaries policy that would regulate digital communication between staff members and students.
- Development of child-friendly reporting mechanism which would not entirely depend upon approaching the principal.
- Anti retaliation measures for complainant, reporter, and witness needs to be developed.

- Information to be restricted on a need to know basis and confidentially to be ensured without being an excuse for statutory non-reporting.
- Annual safeguarding audit to be conducted, including dark zones, transport, hostels, digital technology, committee structure, complaint handling, and training.

### Conclusion

PoSH and POCSO are complementary aspects of the sexual safety regime in India but can not be considered the same or substitutes of each other.

PoSH is a workplace safety and redressal mechanism aimed at protecting women from sexual harassment. POCSO on the other hand, is a gender neutral law relating to child protection in which children under the age of eighteen years fall.

In the context of education institutions, the relationship between the two becomes very complicated in that schools and universities are places of work, learning, authority, and safety at once.

The appropriate course of action here would not be to try and force every situation under a particular institution alone.

POCSO should be followed when applicable, as well as the formation of an independent Internal Committee in case of PoSH.

Compliance should not ultimately be judged based on the number of policy documents that have been created, posters put up, committees formed, or training workshops held each year.

Rather, it should be judged on:

- "If a woman or a child tells us, 'I feel unsafe,' does this individual know where to go—and does the organization know, in law and in sensitivity, what to do next?"
- It is at this point that compliance becomes culture.
- For educational institutions, this culture cannot simply be a legal obligation. Rather, it must be an integral part of integrity, dignity, and trust.

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