

POSH Act Compliance Checklist for Startups and Small Businesses

Compliance Requirement	Status ✓/X/NA
1. Written POSH policy adopted and displayed at the workplace [Section 19]	
2. Penal consequences of sexual harassment are displayed prominently [Section 19(b)]	
3. POSH policy covers remote/WFH workers and digital communications	
4. IC is constituted by a formal written order of the employer [Section 4(1)] (if 10+ employees)	
5. IC composition complies with Section 4(2): Presiding Officer, 2 employee members, 1 external member	
6. At least 50% of IC members are women [Section 4(2) proviso]	
7. External member is genuinely independent — not a retainer counsel or advisor of the organisation	
8. IC member tenures documented and renewal tracked (3-year maximum) [Section 4(3)]	
9. IC members trained in principles of natural justice and inquiry procedure	
10. Conflict-of-interest declaration process in place for IC members	
11. All employees, interns, contractors, and freelancers notified of IC contact details	
12. Annual awareness programme conducted for all employees [Section 19(c)]	
13. Annual IC report prepared and submitted to District Officer by 31 January [Section 21]	
14. Nil Report submitted even when no complaints received	

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15. Board's Report discloses IC constitution (Companies Act / MCA compliance)	
16. Local Committee (LC) jurisdiction identified and displayed (if fewer than 10 employees)	
17. Complaint procedure communicated to gig workers and non-payroll workers	
18. Consensual Relationship Policy (CRP) in place or planned for supervisor-subordinate relationships	
19. POSH policy is reviewed and updated annually	
20. POSH records (annual reports, IC constitution order, training logs) are maintained for a minimum of 3 years	